CITY OF LOS ANGELES DEPARTMENT OF WATER AND POWER

Tujunga Spreading Grounds Enhancement Project

Final Environmental Impact Report

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CEQA Final Environmental Impact Report

Tujunga Spreading Grounds Enhancement Project

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Section 1
Introduction and Summary

1.1 INTRODUCTION TO THE FINAL ENVIRONMENTAL IMPACT REPORT

This document, together with the separately bound Draft Environmental Impact Report (DEIR), constitute the Final EIR for the Tujunga Spreading Grounds (TSG) Enhancement Project.

Section 1 includes a revised Summary to reflect revisions to the Draft EIR including additional mitigation to reduce environmental impacts.

Section 2 provides additions and corrections to the Draft EIR. Additions include revised and new mitigation measures to reduce environmental impacts. Corrections to minor errors, updates, or amplifications of statements in the Draft EIR are shown as underlined and deletions are shown in ~~strikethrough~~ format. Draft EIR section numbers are noted in [brackets].

Section 3 includes a summary of comments received on the Draft EIR at the public meeting for the project, copies of written comments received on the Draft EIR, and responses to comments.

Appendix A is a revised summary of the air quality evaluation.

Appendix B is the sign-in sheet from the public meeting and a list of commenters providing written comments on the Draft EIR.

Appendix C is a copy of a petition received regarding the proposed project. The petition is entitled, "Petition to Oppose Diesel Emissions Process of the LADWP Tujunga Spreading Grounds Enhancement Project".

1.1.1 CEQA Process

1.1.1.1 Notice of Preparation

In February 2012, a CEQA Initial Study was prepared by LADWP based on State CEQA Guidelines Appendix G, to determine whether construction and operation of the proposed project would result in significant effects on the environment. Since potentially significant effects were identified, LADWP determined that an EIR was needed to analyze those effects. A Notice of Preparation (NOP) of the EIR, along with the Initial Study, was prepared and filed with the State Clearinghouse on February 13, 2012. The NOP/Initial Study was distributed to 17 entities, and an additional 15 copies were provided to the State Clearinghouse for distribution. An additional 24 potentially interested parties received a notice of availability of the NOP/Initial Study. Reference copies of the document were available at LADWP offices in Los Angeles, at three libraries in the project area in Los Angeles County, and via a link on the LADWP website.

Additionally, Native American notification was conducted in February 2009 via letter to seven Native American contacts provided by the Native American Heritage Commission (NAHC). No

responses were received. Comments received from the NAHC on the NOP were addressed in the Initial Study for the project.

1.1.1.2 Draft Environmental Impact Report

A Draft EIR was prepared and distributed for public review on August 16, 2012. Fifteen copies of the document were distributed through the State Clearinghouse. The document was also directly distributed to 14 agencies, three neighborhood councils (Sun Valley, North Hollywood, and Arleta), and City Council District 6. At the beginning of the public review period, the document was made available for review at LADWP offices in Los Angeles and at three public libraries in the project area (Panorama City, Valley Plaza, and Pacoima). Three copies of the document were later made available for review at the Sun Valley Library. A Notice of Availability (NOA) of the Draft EIR was distributed to 31 organizations and institutions. The NOA was also distributed to 328 residents located adjacent to the Tujunga Spreading Grounds facility. The original close of the public review period was October 1, 2012; the public review period was extended to October 31, 2012.

1.1.1.3 Public Meeting on the Draft Environmental Impact Report

Notice of a public meeting for the Tujunga Spreading Grounds Enhancement Project was published in the Los Angeles Times on August 16, 2012. The meeting was also noticed by distribution of the NOA. The public meeting was held at 6:00 p.m. on September 12, 2012 at the LADWP Truesdale Facility: 11781 Truesdale Street, Room 205/211, Sun Valley, California 91352.

Based on requests received at the public meeting for the project:

- The Summary of the Draft EIR was translated to Spanish and posted on the LADWP website (ladwp.com/envnotices).
- Three copies of the Draft EIR were made available for public review at the Sun Valley Library on September 13, 2012.
- The close of the comment period was extended from October 1, 2012 to October 31, 2012.
- An alternative method for soil disposal was reexamined. Section 2 of the Final EIR describes changes to mitigation measures for the project to further reduce environmental impacts. A soil disposal conveyor system to Boulevard Pit has been included as Mitigation Measure AIR-1.

1.2 SUMMARY OF THE TUJUNGA SPREADING GROUNDS ENHANCEMENT PROJECT FINAL ENVIRONMENTAL IMPACT REPORT

The TSG are owned by the City of Los Angeles Department of Water and Power (LADWP, Department) and have been operated by the Los Angeles County Flood Control District (Flood Control District) since 1990. LADWP is the lead agency under the California Environmental Quality Act (CEQA) for the TSG Enhancement Project (proposed project). The Flood Control District is a responsible agency for the project, and will design and supervise construction of the

proposed improvements. The proposed project will increase the facility's storage and recharge capacity by altering intake facilities and by deepening and/or combining spreading basins.

1.3 PROJECT BACKGROUND AND OBJECTIVE

The Flood Control District operates the TSG by diverting stormwater from the Tujunga Wash Channel using a rubber dam and distributing it through the facility using a canal system and flashboard structures. TSG is located adjacent to the unlined Sheldon-Arleta Landfill. In the past, when TSG recharged large amounts of water, methane gas migrated from the landfill to local residential properties. This issue caused temporary restrictions to be placed on the stormwater facility to prevent methane gas migration into nearby schools and communities during stormwater spreading operations. Two of the existing basins, covering approximately 15 acres, were taken out of service due to methane gas migration. Phase I of the Cesar Chavez Project (completed in 2010) upgraded the landfill's methane gas extraction system and mitigated this issue, allowing for full operation of the spreading facilities.

The San Fernando Groundwater Basin is the City's primary local water source, providing approximately 11 percent of the total water supply. However, the Basin is experiencing a decline in groundwater levels that threatens its long-term sustainability. Therefore, the objective of the TSG Enhancement Project is to increase stormwater recharge into the San Fernando Groundwater Basin through enhancement and operation of the TSG facility.

1.4 PROJECT LOCATION AND SETTING

The project site is located south of the San Gabriel Mountains in an urbanized area of the City of Los Angeles. Stormwater from the largely undeveloped mountain areas flows first to Hansen Dam, where it is temporarily held, and then released to Tujunga Wash, from which it can be diverted to the project site. The TSG is located approximately 17 miles northwest of downtown Los Angeles in the northeastern portion of the San Fernando Valley.

The proposed project enhancements will be within the boundary of the existing 160-acre facility roughly bounded by Roscoe Boulevard, SR-170 freeway, Laurel Canyon Boulevard, and the Tujunga Wash. On-site facilities include 20 spreading basins, a small office building, water storage tank, water pumping station, ammoniation station, and various intake and water conveyance structures, in addition to power line rights-of-way for Southern California Edison and LADWP. Adjacent to the site along the flood control channel are the 12 wells that form the Tujunga Wellfield. Adjacent land uses to TSG are residential, commercial operations, and schools. Figure 1-1 is the existing site plan for the Tujunga Spreading Basins (revision of Draft EIR Figure 2-2).

Key to Features

- Existing Spreading Basins
- Project Site
- Existing Stormwater Conveyance (above ground open channel)
- Existing Stormwater Conveyance (below ground pipe)
- Tujunga Wellfield

N

0 550 1,100 Feet

Document: TujungaConveyance.mxd

Date: April 12, 2013

Existing Site Plan
Tujunga Spreading Grounds

MWH

Figure 1-1

1.5 PROJECT DESCRIPTION

The TSG will be enhanced to enable an average of an additional 8,000 acre-feet (2.6 billion gallons) of stormwater per year to be captured and recharged. The proposed site plan is included as Figure 3-1 of the Draft EIR. The proposed project will:

- Alter the current intake facility to capture low flows from Tujunga Wash and install a trash rack to improve water quality. Low flows will pass under I-5 using existing conveyance pipe and will be released into the reactivated basins located southeast of the freeway interchange. These basins will be improved to provide attenuation to allow for settling of larger solids prior to recharging groundwater.
- Install two new intake facilities to capture high flows from the Tujunga and Pacoima Diversion Washes. Intake No. 1 will be located immediately southwest of the freeway interchange and will divert 250 cubic feet per second (cfs) into the upper portion of the TSG. Intake No. 2 will be located immediately downstream of the confluence of the Tujunga Wash and Pacoima Wash Channels and will divert a maximum of 200 cfs into the lower portion of the TSG. Two inflatable rubber dams (60-foot-wide and 104-foot-wide) will be used to direct Tujunga Wash and Pacoima Wash flows to the spreading basins.
- Install devices to prevent widespread distribution of trash within the TSG.
- Reactivate, deepen and/or combine basins to increase the facility's storage and recharge capacity. The existing TSG Basins A through N and Q through T will be graded to accept water from either intake system. The existing overflow from Basin B will continue to act as an overflow to Tujunga Wash. Basins O and P, which are the dormant, uppermost basins, located between I-5 and SR-170, will be reactivated, deepened, and able to accept low flows throughout the dry season, and may be able to accept flows during the wet season, depending on operational limitations and available flows. All basins west of SR-170 (Basins A through N and Q through T) will be deepened, and some combined, increasing storage and recharge capacity.
- Replace existing canal and flashboard structures (which connect and allow water to flow between basins) with modernized inter-basin weir structures and by-pass gates. All new diversion facilities will be automated; operation will be managed remotely from LADWP's on-site facility.
- Fence the TSG facility. Adjacent to freeways, private property, and the Tujunga Wash Channel, chain link fence will be installed. The fence fronting the public right-of-way at Basins 3, 6, 7, 8, and 9 will be 8-ft tall tubular steel fence. The fence fronting the public right-of-way at Basins O, 1, 2, 4, and 5 will be split rail fence.
- Additionally, depending on the availability of space on site, compatibility with the project, and funding opportunities, recreational enhancements may be added to the facility. Potential compatible uses for the property are walking trails, outdoor classrooms and associated educational activities, and native habitat enhancement.

1.6 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Table 1-1 summarizes the impacts of the proposed project and the mitigation measures identified to reduce potentially significant effects.

1.7 RELATED PROJECTS AND CUMULATIVE IMPACTS

Related projects are projects that may have impacts that are cumulative with the proposed project. Seven potential construction projects have been identified for the project area and may be constructed in a similar time frame (2012 to 2015) as the proposed project. The related projects include housing, schools, and a commercial development (**Table 1-2**) and are all located within 1.5 miles of the TSG.

The traffic analysis considered traffic potentially generated by the related projects; impacts were found to be less than significant. One or more of the related projects may be constructed at the same time as the proposed project. Therefore, air pollutant emissions would have a cumulatively considerable, but temporary, impact on ambient air quality during construction activities. Six of the related projects are too distant to have cumulative impacts on noise. The housing project proposed for 12501 Sheldon Street would be immediately adjacent to the TSG; however, a skate park is now proposed. As mitigated, impacts on noise would be temporary, and less than cumulatively considerable.

Table 1-1
Summary of Proposed Project Impacts and Mitigation Measures

Environmental Topic	Impact Discussion	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
Aesthetics	• No significant visual resources will be disturbed or obstructed. • Lighting, if any, will be shielded away from adjacent residences.	Less than Significant	No mitigation required.	Less than Significant
Agriculture and Forest Resources	• No agricultural or forest lands will be disturbed.	No Impact	No mitigation required.	No Impact
Air Quality - Construction	• Construction equipment and soil hauling trucks will temporarily emit air pollutants in excess of established regional standards for ROG, CO, NO_x, and $PM_{2.5}$. Maximum daily emissions would also be above local significance thresholds for NO_x, PM_{10}, and $PM_{2.5}$.	Significant	**AIR-1 Soil Conveyor System to Boulevard Pit –** The majority of soils excavated as part of project construction shall be transported off-site via an electric-powered conveyor system to Boulevard Pit near the intersection of Laurel Canyon Boulevard and Tujunga Wash Channel. The conveyor shall be installed aboveground across the Tujunga Spreading Grounds and underground in existing culverts and pipes across Arleta Avenue, State Route 170, and Interstate 5, and across the top of Tujunga Wash Channel. The conveyor shall be installed in a new underground pipe under Laurel Canyon Boulevard from Tujunga Spreading Grounds to Vulcan Materials Company Boulevard Pit.	Significant with implementation of feasible mitigation

Environmental Topic	Impact Discussion	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
			AIR-2 Equipment Maintenance – All equipment shall be properly tuned and maintained in accordance with manufacturer's specifications. **AIR-3 On-Road Truck Efficiency –**Material delivery trucks and soil haul trucks shall meet EPA 2007 model year NOx emissions requirements. **AIR-4 Off-Road Equipment Efficiency** - All on-site construction equipment shall meet EPA Tier 3 or higher emissions standards according to the following: Project start, to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by CARB. Any emissions control device used by the Construction Contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.	

Environmental Topic	Impact Discussion	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
			Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. The Construction Contractor shall supply a copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit at the time of mobilization of each applicable unit of equipment. LADWP and/or Los Angeles County shall encourage the Construction Contractor to apply for SCAQMD "SOON" funds. **AIR-5 Equipment Operation** – The contractor shall maintain and operate construction equipment to minimize exhaust emissions. **AIR-6 Truck Idling** – During construction, truck idling shall be limited to 5 minutes, on- and off-site, as feasible.	

Environmental Topic	Impact Discussion	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
			AIR-7 Street Sweepers – During construction, street sweepers that comply with SCAQMD Rules 1186 and 1186.1 shall be used. Streets shall be swept at the end of the day if visible soil is carried onto adjacent public paved roads. **AIR-8 Generator Use –** To the extent possible, power will be obtained from power poles (the electrical grid) rather than the use of temporary diesel or gasoline power generators. **AIR-9 Traffic Speed Control** – During construction, traffic speeds on unpaved roads shall be reduced to 15 mph or less. **AIR-10 Catalytic Converters –** Catalytic converters shall be installed on all heavy construction equipment, where feasible. **AIR-11 Soil Stabilizers** – Non-toxic soil stabilizers shall be applied according to manufacturers' specifications to inactive construction areas. Inactive construction areas are defined as previously graded areas inactive for 10 days or more. **AIR-12 Construction during High Winds** – A High Wind Fugitive Dust Control Plan shall be prepared and implemented when wind speeds exceed 25 mph. The	

Environmental Topic	Impact Discussion	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
			Plan shall detail measures to limit excavating and grading operations when wind speeds exceed 25 mph. **AIR-13 Dust Control** – Non-toxic soil stabilizers shall be applied according to manufacturers' specifications, or water shall be applied, to all unpaved parking or staging areas or unpaved road surfaces as needed and as directed by the Construction Manager to prevent visible dust to comply with Rule 403 for large operations. **AIR-14 Vehicle Dirt Tracking** – Wheel washers or other approved stabilized construction ingress and egress devices shall be installed where trucks exit the construction site onto paved roads or equipment shall be washed-off leaving the site each trip. **AIR-15 Ground Cover** – Ground cover shall be replaced in disturbed areas suitable for vegetation as quickly as possible. **AIR-16 Truck Covers** – All trucks hauling dirt, sand, soil, or other loose materials shall be covered.	
Air Quality - Operation	• Project operation will result in air pollutant emissions related	Less than Significant	No mitigation required.	Less than Significant

Environmental Topic	Impact Discussion	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
	to equipment used for periodic maintenance activities, similar to existing conditions.			
Biological Resources	• Special status species do not occur on site and no habitat for special status species will be disturbed. • Minor areas with limited patches of native vegetation will be temporarily disturbed during construction.	Less than Significant	No mitigation required.	Less than Significant
Cultural Resources	• No historic, archeological, or paleontological resources are known for the project site. • Limited potential for disturbance of unknown cultural resources during basin excavation.	Significant	**CR-1 Cultural Resources Awareness Training –** Construction personnel and staff shall be given training by a qualified archaeologist on the identification of possible archaeological and paleontological resources that may be present in the area. In the event potential archaeological or paleontological resources are encountered during excavation, work in the vicinity of the discovery shall halt until appropriate treatment of the resource is determined by a qualified archaeologist/ paleontologist in accordance with the provisions of CEQA Section 15064.5.	Less than Significant

Environmental Topic	Impact Discussion	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
			CR-2 Reporting for Discovery of Human Remains – If human remains are encountered during project activities, work within 25 feet of the discovery shall be redirected and the County Coroner notified immediately. At the same time, an archaeologist shall be contacted to assess the situation and consult with agencies as appropriate. Project personnel shall not collect or move any human remains and associated materials. If the human remains are of Native American origin, the Coroner must notify the Native American Heritage Commission within 24 hours of this identification. The Native American Heritage Commission will identify a Most Likely Descendant to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods.	
Geology and Soils	• The site is located in a seismically active area but is not in an area considered susceptible to liquefaction landslides, or expansive soils. • No habitable or other above ground structures are proposed.	Less than Significant	No mitigation required.	Less than Significant

Environmental Topic	Impact Discussion	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
	• Soil erosion during construction will be controlled with standard best management practices.			
Greenhouse Gas Emissions	• Construction equipment and soil hauling trucks will emit greenhouse gases including CO_2, CH_4, and N_2O. Amortized construction emissions will not exceed established thresholds. • No substantial increase in greenhouse gas emissions for project operation.	Less than Significant	No mitigation required, however, mitigation measures to reduce air emissions will also reduce greenhouse gases from project construction.	Less than Significant
Hazards and Hazardous Materials	• Hazardous materials use limited to fuels, oils and lubricants for construction equipment and vehicles. • Project site is not a known hazardous materials site.	Less than Significant	No mitigation required. [Emergency service providers notification included under Traffic mitigation, below.]	Less than Significant
Hydrology and Water Quality	• Project will increase diversion of storm water and groundwater recharge to the San Fernando Groundwater Basin. • Treatment of Tujunga Wash low flows will improve	Beneficial for groundwater volume, water quality and flooding Less than Significant for stormwater quality impacts during	No mitigation required.	Beneficial impact for groundwater volume, water quality and flooding Less than Significant for stormwater

Environmental Topic	Impact Discussion	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
	water quality. • Stormwater quality during construction will be controlled with standard best management practices.	construction		quality impacts during construction
Land Use and Planning	• Site will continue to operate as a stormwater recharge facility. No habitable structures are proposed.	No Impact	No mitigation required.	No Impact
Mineral Resources	• No known mineral resources are present on the project site.	No Impact	No mitigation required.	No Impact
Noise	• Project construction equipment will (temporarily) substantially increase noise on adjacent residential properties above ambient conditions. • Project operation will result in noise generation from periodic maintenance activities, similar to existing conditions.	Significant for Project Construction Less than Significant for Project Operation	**N-1 Construction Hours** - Construction shall be limited to: • Weekdays: 7:00 AM to 9:00 PM • Saturdays: 8:00 AM to 6:00 PM • No construction shall occur on Sundays or national holidays. **N-2 Mufflers** - Construction equipment, fixed and mobile, shall be equipped with properly operating and maintained noise mufflers and intake silencers, consistent with manufacturers' standards. Each piece of equipment will be individually inspected to ensure proper operation of the muffler and silencer equipment.	Less than Significant for Project Construction and Operation

Environmental Topic	Impact Discussion	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
			N-3 Noise Control Plan - A Noise Control Plan shall be prepared prior to the start of construction, and implemented during the entire construction period. The Plan shall: • Predict noise levels during construction activity based on the specific construction equipment to be used at the site. If equipment noise levels are not available, these shall be measured in the field. • Identify areas of the construction site where noise control is required to meet noise ordinance standards. For these areas, identify the additional measures, which may include: specialized mufflers or silencers, directional exhaust pipes, damping and sound absorptive material, and/or acoustical barriers. Where relevant, the size, number and location of portable acoustical barriers and/or noise control curtains to be used during construction will be detailed. The height and length of the barriers shall be determined based on the location of the construction activity, specific construction equipment to be used (type and number) and distance to the receptors. • Predict noise levels during construction activity with	

Environmental Topic	Impact Discussion	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
			use of specialized mufflers or silencers, directional exhaust pipes, damping and sound absorptive material, and/or acoustical barriers, as relevant. • Document the reduction in construction noise via monitoring. Noise monitoring shall be conducted a minimum of 1 day per week when construction is within 400 feet of a residence.	
Population and Housing	• No habitable structures or expansion of the potable water system are proposed.	No Impact	No mitigation required.	No Impact
Public Services	• Project does not include habitable structures or other elements that would substantially increase the need for public services.	Less than Significant	No mitigation required.	Less than Significant
Recreation	• Project will not affect population; therefore it will not increase the need for recreational facilities. • Project may include construction of trails or other amenities as enhancements to the site.	No impact on existing recreational facilities Potential beneficial impact of additional recreational amenities	No mitigation required.	Less than Significant

Environmental Topic	Impact Discussion	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
Transportation and Traffic	• Construction workers commuting to the site and haul trucks for soil disposal will temporarily increase traffic on area roadways. No intersections will experience a level of service (LOS) worse than D. • Project operation will result in traffic generation from periodic maintenance, similar to existing conditions.	Less than Significant	Mitigation included to further reduce less than significant effects: **TR-1 Construction Traffic Management Plan** – A construction traffic management plan shall be prepared and submitted to LADOT for review and approval prior to the start of construction activity. This plan may designate haul routes for construction-related trucks, the location of access to the construction site, and temporary traffic control devices or flagmen, as relevant. Where construction activities would occur within a public street right-of-way around the project site, the following mitigation measures shall also be implemented: **TR-2 Traffic Control Plan** – A site-specific construction traffic control plan shall be prepared and submitted to LADOT for review and approval prior to the start of any construction work. This plan may include the location of lane closures (if any), restricted hours during which lane closures (if any) would not be allowed, local traffic detours (if any), protective devices and traffic controls (such as barricades, cones, flagmen, lights, warning beacons, temporary traffic	Less than Significant

Environmental Topic	Impact Discussion	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
			signals, warning signs) (as relevant), access limitations for abutting properties (if any), and provisions to maintain emergency access through construction work areas (as relevant). **TR-3 Signage** – Signage shall be provided indicating alternative pedestrian and bicycle access routes, if necessary where existing facilities would be affected. This would include the sidewalks and pedestrian pathways around the perimeter of the project site. **TR-4 Advanced Notice** – Advance notice shall be provided of planned construction activities to residents, businesses and property owners immediately adjacent to the construction site. **TR-5 Emergency Access Coordination** – Coordination shall be conducted with emergency service providers (police, fire, ambulance and paramedic services) to provide advance notice of ongoing construction activity and construction hours.	
Utilities and Service Systems	• No new utility systems will be required, except for the proposed stormwater capture and recharge facilities.	No impact on wastewater, water, and solid waste regulations. Less than	No mitigation required.	Less than Significant

Environmental Topic	Impact Discussion	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
	• Project will generate approximately 1.3 million cubic yards of soil requiring off-site disposal. Material proposed to be re-used at an adjacent aggregate mining facility.	Significant on landfills.		

Table 1-2
Related Projects

Project Number	Location	Type of Development	Size of Development
1	12501 Sheldon Street	Multi-Family Residential (skate park now proposed)	63 dwelling units
2	8401 Arleta Avenue	Middle School (construction complete)	1,053 students
3	9171 Telfair Avenue	High School	1,620 students
4	13000 Montague Street	Elementary School	400 students
5	9582 Haddon Avenue	Condominiums	125 dwelling units
6	8755 Woodman Avenue	Middle School	480 students
7	7934 Lankershim Boulevard	Shopping Center	60,000 square feet

Source: City of Los Angeles, 2011.

1.8 ALTERNATIVES TO THE PROPOSED PROJECT

1.8.1 No Project

Under No Project, the spreading grounds would not be improved and there would be no disposal requirement for approximately 1.3 million cubic yards of soil. Additional stormwater could be diverted from the Tujunga Wash under No Project, since the methane gas migration concern at the adjacent Arleta Landfill has been resolved. However, high flows from the Pacoima and Tujunga Washes could not be diverted to the spreading basins. Since the trash racks and low flow treatment area would not be constructed under No Project, water quality would not be improved. Without the project, fine soils that reduce percolation would not be removed from the bottom of the basins and additional conveyance features would not be installed to transport stormwater among basins. The maximum volume of stormwater that could be recharged to the groundwater table under No Project is limited by the existing intake (250 cfs maximum) and the existing percolation rate (140 cfs), substantially less than the volume anticipated under the project.

Under No Project, temporary construction-related air pollutants would not be emitted, noise impacts on adjacent residences would not occur, and traffic for project soil disposal (loads not suitable for transport by conveyor) would not be added to streets in the project vicinity. However, No Project does not meet the project objective of increasing stormwater recharge into the San Fernando Groundwater Basin through enhancement and operation of the TSG facility.

1.8.2 Soil Disposal Alternatives

Alternatives to the proposed project focused on the off-site portion of the project with the greatest potential environmental impacts – disposal of approximately 1.3 million cubic yards of excess soil. However, with implementation of Mitigation Measure AIR-1, the majority of soils will be transported by conveyor to Boulevard Pit. Soil disposal by truck will be limited to soils that are not suitable for transport via conveyor belt (e.g., large cobbles). Alternative soil disposal locations for these loads are:

- Alternative 1 – Boulevard Pit Disposal Site
- Alternative 2 – Sheldon Pit Disposal Site
- Alternative 3 – Cal Mat Disposal Site
- Alternative 4 – Bradley Landfill and Recycling Center Disposal Site
- Alternative 5 – Combination of Soil Disposal Alternative Locations

Environmental impacts of the various disposal locations are:

Air Quality - All of the disposal sites are near the project. The Boulevard Pit disposal site is closest to the TSG, directly northeast of the site. This alternative would require the least amount of truck travel. Alternatives 2, 3 and 4 are along Sheldon Street northeast of the project site. Travel to these alternative sites would require the longest truck travel distance. Air pollutant emissions would be slightly higher for Alternatives 2, 3, and 4 than for Alternative 1, which involves the shortest travel distance. Under any of the alternatives, including using more than one of the disposal options, air pollutant emissions would be temporarily significant as mitigated.

Noise – Significant noise impacts from project construction would occur during normal working hours at residential receptors adjacent to the TSG. The soil disposal location selected for soils that are not suitable for transport via conveyor belt would not impact the noise levels from the on-site construction equipment. Mobile noise generated during soil hauling activities will be less than significant under all alternatives. However, Alternative 1, Boulevard Pit, would require the least amount of truck travel and therefore it would generate the least amount of mobile noise.

Traffic – Under the worst-case assessment with all soil disposal via truck, all four soil disposal location alternatives would have similar impacts on existing traffic and future (2015) traffic conditions. Under scenario 1 (trucks using driveway off Sheldon Street), Alternative 1 (Boulevard Pit) would not only adversely impact Sheldon Street and Roscoe Boulevard (as would the other three alternatives) but it would also impact the intersection of Arleta Avenue and Sheldon Street. However, none of the predicted impacts (existing or future conditions) to intersections in the project vicinity under any of the alternatives would result in LOS E or F (normally unacceptable) and all impacts would be temporary, limited to project construction. Additionally, with implementation of Mitigation Measure AIR-1, the majority of the truck trips analyzed in the traffic analysis would not occur and soil hauling by truck would be limited to soils that are not suitable for transport via conveyor belt.

1.8.3 Environmentally Superior Alternative

As compared with No Project, the proposed project with any of the identified soil disposal options is considered the environmentally superior alternative. No Project would not result in noise impacts on adjacent residences during construction, add traffic to area streets, or result in significant air pollutant emissions. However, all of the adverse impacts identified for the project are temporary and will be mitigated as feasible. No Project would not allow the capture of additional stormwater from the Tujunga and Pacoima Washes, would not recharge additional water to the San Fernando Groundwater Basin, and would not increase local water supplies.

Under No Project, environmental impacts (e.g., energy use, and related air pollutant emissions) could result from well pumping, and transport and treatment of additional imported water supplies. In the context of existing water shortages in the Los Angeles area, the long-term benefit of operation of the proposed project outweighs the short-term adverse impacts related to project construction. Therefore, the proposed project is the environmentally superior alternative.

The Boulevard Pit soil disposal location is closest to the TSG and therefore will require the least truck travel during project construction. With implementation of Mitigation Measure AIR-1, the majority of the truck trips analyzed in the traffic analysis would not occur and soil hauling by truck would be limited to soils that are not suitable for transport via conveyor belt. All of the soil disposal alternatives would have the same level of impact on noise on residences adjacent to the project site. The Boulevard Pit alternative would have slightly less mobile noise impacts. Overall, since the differences in the impacts associated with the alternative soil disposal locations are minimal, all of the alternatives are considered comparable in their level of environmental impact. Therefore, the proposed project with any of the soil disposal alternatives (or a combination of locations) is the environmentally superior alternative.

1.9 GROWTH-INDUCING IMPACTS

The proposed project does not involve construction of new homes or businesses and does not include construction of new, potentially growth-inducing, infrastructure such as roads or potable water or wastewater systems. The project will facilitate the capture of additional stormwater for recharge of the San Fernando Groundwater Basin, which will increase available water supplies in the region. However, no new groundwater extraction systems, potable water treatment or water distribution systems will be constructed as part of this project. Therefore, the project will not be directly or indirectly growth-inducing related to expansion of infrastructure systems.

Construction of the project will require up to 40 workers for an estimated 2.6 years. It is anticipated that workers would frequent businesses in the project area during this period. Due to the limited number of workers required and the temporary nature of construction, the impact on economic growth is less than significant. Operation of the project will not require additional workers over existing operations and maintenance staff. Therefore, the project will have a less than significant impact on population and economic growth.

1.10 SIGNIFICANT ENVIRONMENTAL IMPACTS FOR WHICH NO FEASIBLE MITIGATION IS AVAILABLE

Implementation of dust control measures in compliance with SCAQMD Rule 403, including Mitigation Measures AIR-7, AIR-9 and AIR-11 through AIR-16, will substantially reduce particulate matter emissions during project construction. As mitigated, particulate emissions are predicted to be below regional significant thresholds but potentially (depending on the actual reduction efficiencies achieved for the project) above local significant thresholds. Since a wide-range of dust control measures will be incorporated into the project, additional feasible mitigation measures to further reduce particulate matter have not been identified.

Implementation of mitigation measures AIR-1 through AIR-16 would reduce air pollutant emissions during project construction. All or most of the air pollutant emissions related to soil hauling will be avoided by use of a conveyor for soil disposal. However, emissions reductions that can be achieved with implementation of the other measures are not quantifiable and are not anticipated to reduce emissions of ROG, CO, and NOx below levels of significance. Use of heavy construction equipment and vehicles is required in order to implement the project. Mitigation to reduce emissions (although not necessarily below levels of significance) will include EPA Tier 3 or higher emissions standards.

Therefore, with implementation of feasible mitigation measures, maximum daily emissions associated with construction for the TSG Enhancement Project would remain significant. However, construction emissions would not have a long-term air quality impact because these emissions would cease at the completion of construction.

1.11 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Adverse environmental effects of the project related to construction – noise, traffic and air pollutant emissions – will all cease once project construction is complete and will not result in irreversible environmental changes. However, construction of the project will require the use of heavy equipment, workers' vehicles, and a limited number of soil disposal haul trucks. The equipment and vehicles will consume nonrenewable fossil fuels for the length of construction, estimated at approximately 2.6 years. Since the objective of the project is to increase stormwater recharge into the San Fernando Groundwater Basin, thus increasing local water supplies, the fuel use may be offset by corresponding reductions in energy use associated with well pumping, and transport and treatment of imported water supplies. The benefit of the project therefore justifies the use of irreplaceable resources (fossil fuels).

Operation of the project will require similar operations and maintenance activities as under existing conditions; there may be some minor increase in equipment use related to maintenance of landscaped areas, if implemented. However, no new workers will be required for facility operation, and overall, there will be no substantial additional consumption of nonrenewable resources for project operation. There are no significant adverse environmental changes associated with project operation.

1.12 AREAS OF KNOWN CONTROVERSY AND ISSUES TO BE RESOLVED

CEQA Guidelines Section 15123 requires that EIRs contain a discussion of areas of known controversy and issues to be resolved. The method to be used for disposal of excess soils from the site is an area of known controversy related to the proposed project. Based on comments received on the Draft EIR, a mitigation measure to convey excess soils via conveyor from TSG to Boulevard Pit has been defined. With incorporation of this Mitigation Measure (AIR-1), the majority of the soil hauling truck trips estimated in the Draft EIR will not be required.

Section 2 – Additions and Corrections

Section 2
Additions and Corrections

The following section summarizes additions and corrections to the Draft EIR including additional Mitigation Measures proposed for the project to further reduce environmental effects.

2.1 SOIL DISPOSAL CONVEYOR SYSTEM

2.1.1 Background

During early project planning, installation of a conveyor system from TSG to the adjacent Boulevard Pit (11401 W. Tuxford Street) was considered. Originally, an alignment in Tujunga Wash Channel was evaluated. Since this alignment could interfere with the normal operation of the stormwater channel, and since disposal of project soils at Boulevard Pit was not confirmed, this alternative was rejected and not studied further.

However, based on numerous comments received on the Draft EIR, alternative methods of soil disposal from project construction instead of trucking were reconsidered. Specifically, a conveyor alignment aboveground across the TSG with crossings under the Freeways within existing box culverts and concrete pipes was evaluated. Additionally, further discussions with Vulcan Materials Company have determined that soil disposal at Boulevard Pit will be possible. The majority of excavated soils are anticipated to be acceptable for reuse at Boulevard Pit. Some soil loads (e.g., large cobbles unfit for the conveyor belt) may require disposal via haul truck at Boulevard Pit or at an alternative disposal site.

2.1.2 Conveyor Description

A soil disposal conveyor system Mitigation Measure (AIR-1) will therefore be added to the proposed project. The Construction Contractor will determine the specific conveyor to be used and the precise alignment. However, it is anticipated that the conveyor will be approximately 4.5 feet wide overall with an approximately 3-foot-wide belt and elevated 3 to 4 feet above the ground surface (for the aboveground segments). Based on recent conveyor use at the Santa Anita Dam, with a travel rate of approximately 550 feet per minute, disposal of 1,200 tons of sediment per hour can be accomplished. Based on 6 to 7 hours of operation per day, and an approximate soil weight of 1.5 tons per cubic yard, sediment disposal would require approximately 240 work days (1 calendar year). This is considered a rough estimate only, since the specific weight of excavated soils, operating hours of the conveyor, and soil handling capacity at Boulevard Pit will all affect the actual number of days needed for soil disposal.

Conveyor Alignment – The anticipated alignment is depicted in (**Figure 2-1**). A photograph of the conveyor system at Santa Anita Dam is included as **Figure 2-2** (it is assumed that the conveyor at TSG will be similar). The anticipated alignment is:

- The conveyor will begin in proposed Basin 2A south of Arleta Avenue, with a trap loader that loads material onto the conveyor belt.
- Underneath Arleta Avenue through an existing box culvert.
- Overland across proposed Basin 3.
- Underneath State Route 170 through an existing box culvert.
- Overland across proposed Basin 8.
- Underneath Interstate 5 through an existing concrete pipe.
- Overland along the spreading grounds intake canal located between the Interstate 5 and Laurel Canyon Road. The pipe inlet structure located near I-5 will be modified and some temporary re-grading will be required to accommodate the conveyor belt.
- Across the top of Tujunga Wash from proposed Basin 9, then along the northwest side of Tujunga Wash.
- Underneath Laurel Canyon Boulevard immediately northwest of Tujunga Wash in a new pipe (approximately 6 feet in diameter) to be constructed as part of this project.
- Overland along the access road on the northwest side of Tujunga Wash, then into Boulevard Pit.

The portion of the alignment along Tujunga Wash is fenced and within County of Los Angeles right-of-way.

2.1.3 Conveyor Operation

It is anticipated that once project constructions begins, soils will be excavated and stockpiled on-site until installation of the conveyor system is completed. Soils in Basins 4 and 5 will be trucked across Sheldon Street and then taken to the conveyor loading point. Once installed, operation of the conveyor will be continual during construction hours or as limited by soil management capacity at Boulevard Pit. The Construction Contractor will coordinate directly with Vulcan Materials Company during soil disposal operations.

Dust Control - A spray bar will be installed at the trap loader and junction points of conveyor segments to apply water as needed.

Containment System - Belt scrapers will remove material from the return section of the belt in areas that are outside of the project area (i.e., the channel crossings). As material is removed from the return belt it will fall onto the preceding conveyor and will not collect on the ground.

Conveyor Noise – The conveyor system will generate noise from the motors located at the junction of each conveyor segment. Based on previous installations, noise levels are anticipated to be steady during conveyor operation and to range up to 80 dBA at 50 feet based on design. The drive units of the conveyor belts have been measured at 77 dBA Leq at 35 feet, with the conveyor belt rollers much lower at 53 dBA Leq. The closest residential properties are located approximately 50 feet from the anticipated conveyor alignment, across Tujunga Wash Channel. Based on this distance, the conveyor system could generate up to 80 dBA; however, the specific drive units and their locations will determine noise levels at adjacent properties. To more precisely determine the noise impact on adjacent residents, the conveyor system will be

considered as part of the Noise Control Plan (mitigation measure N-3). If conveyor noise would exceed Los Angeles Municipal Code construction standards (Draft EIR Section 4.2.3), relocating drive units, enclosing conveyor motors and/or installation of acoustical barriers shall be implemented as described in the Noise Control Plan.

Key to Features

- Above Ground
- Within Existing Box Culvert/Concrete Pipe
- Within New Pipe

N

0 175 350 Feet

Document: \\Uspas1s01\MUNI\Clients\Los Angeles Water&Power\47063-2 - Environmental On-Call 2011\TO 007 Tujunga Ponds EIR\14 Electronic Files - Modeling\GIS_MXDs\SoilConveyorAlignment.mxd

Date: March 15, 2013

Soil Conveyor Alignment (Approximate)

MWH.

Figure 2-1

Figure 2-2
Photograph of Soil Conveyor System (Santa Anita Dam)

Electrical Demand – Based on a length of approximately 3,500 feet, the electric demand of the conveyor system is estimated at 500 kW. Existing electric supply at the TSG site will be used to power the conveyor system.

2.1.4 Addition to the Draft EIR

Therefore, the following mitigation measure is added to the proposed project to further reduce air pollutant emissions:

AIR-1 Soil Conveyor System to Boulevard Pit – The majority of soils excavated as part of project construction shall be transported off-site via an electric-powered conveyor system to Boulevard Pit near the intersection of Laurel Canyon Boulevard and Tujunga Wash Channel. The conveyor shall be installed aboveground across the Tujunga Spreading Grounds and underground in existing culverts and pipes across Arleta Avenue, State Route 170, and Interstate 5, and across the top of Tujunga Wash Channel. The conveyor shall be installed in a new underground pipe under Laurel Canyon Boulevard from Tujunga Spreading Grounds to Vulcan Materials Company Boulevard Pit.

2.2 REVISION OF AIR QUALITY MITIGATION MEASURES

Based on comments received from the SCAQMD and other agencies, organizations and individuals, air quality Mitigation Measures have been revised to further reduce air pollutant emissions during project construction. Mitigation Measures are revised as noted below. Text inserts are shown as underlined and deletions are shown in ~~strikethrough~~ format. These revisions are applicable to Draft EIR Sections 1.4, 4.1 and 5.3.

AIR-2 Equipment Maintenance – All equipment shall be properly tuned and maintained in accordance with manufacturer's specifications.

AIR-3 On-Road Truck Efficiency – ~~As feasible, construction equipment will be selected that has low pollutant emissions and high energy efficiency. Factors to consider include model year, alternative fuels (e.g., compressed natural gas, biodiesel, emulsified diesel, methanol, propane, butane, and low sulfur diesel) and lean NOx catalyst.~~ Material delivery trucks and soil haul trucks shall meet EPA 2007 model year NOx emissions requirements.

AIR-4 Off-Road Equipment Efficiency - All on-site construction equipment shall meet EPA Tier 3 or higher emissions standards according to the following:

> Project start, to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by CARB. Any emissions control device used by the Construction Contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

The Construction Contractor shall supply a copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit at the time of mobilization of each applicable unit of equipment.

LADWP and/or Los Angeles County shall encourage the Construction Contractor to apply for SCAQMD "SOON" funds.

AIR-5 Equipment Operation – The contractor shall maintain and operate construction equipment to minimize exhaust emissions. ~~During construction, trucks and vehicles will minimize idling when not in use to the extent feasible.~~

AIR-6 Truck Idling – During construction, truck idling shall be limited to 5 minutes, on- and off-site, as feasible.

AIR-7 Street Sweepers – During construction, street sweepers that comply with SCAQMD Rules 1186 and 1186.1 shall be used. Streets shall be swept at the end of the day if visible soil is carried onto adjacent public paved roads.

AIR-8 Generator Use – To the extent possible, power will be obtained from power poles (the electrical grid) rather than the use of ~~large~~ temporary diesel or gasoline power generators ~~on site~~.

AIR-9 Traffic Speed Control – During construction, traffic speeds on unpaved roads shall be reduced to 15 mph or less.

AIR-10 Catalytic Converters – Catalytic converters shall be installed on all heavy construction equipment, where feasible.

AIR-11 Soil Stabilizers – Non-toxic soil stabilizers shall be applied according to manufacturers' specifications to inactive construction areas. Inactive construction areas are defined as previously graded areas inactive for 10 days or more.

AIR-12 Construction during High Winds – A High Wind Fugitive Dust Control Plan shall be prepared and implemented when wind speeds exceed 25 mph. The Plan shall detail measures to limit excavating and grading operations when wind speeds exceed 25 mph.

AIR-13 Dust Control – Non-toxic soil stabilizers shall be applied according to manufacturers' specifications, or water shall be applied, to all unpaved parking or staging areas or unpaved road

surfaces as needed and as directed by the Construction Manager to prevent visible dust to comply with Rule 403 for large operations.

AIR-14 Vehicle Dirt Tracking – Wheel washers or other approved stabilized construction ingress and egress devices shall be installed where trucks exit the construction site onto paved roads or equipment shall be washed-off leaving the site each trip.

AIR-15 Ground Cover – Ground cover shall be replaced in disturbed areas suitable for vegetation as quickly as possible.

AIR-16 Truck Covers – All trucks hauling dirt, sand, soil, or other loose materials shall be covered.

2.3 REVISIONS TO AIR QUALITY CALCULATIONS

Based on comments received from the SCAQMD (see comment letter 4 in Section 3 of the Final EIR), re-calculation of air pollutant emissions from project construction before mitigation was conducted (see FEIR Appendix A). Based on these revisions, Draft EIR Tables 4.1-8 and 4.1-9 were revised.

Table 4.1-8
Estimated Maximum Daily Construction Emissions

Source	ROG (lbs/day)	CO (lbs/day)	NO_X (lbs/day)	SO_X (lbs/day)	PM_{10} (lbs/day)	$PM_{2.5}$ (lbs/day)
Spreading Basins						
Heavy Construction Equipment	142.06	520.84	1293.79	1.58	45.93	40.88
Worker Vehicles	0.20	6.22	0.59	0.01	0.11	0.05
Construction Trucks	0.76	3.02	12.63	0.01	25.310.62	2.950.44
Haul Truck Idling	0.52	2.94	2.71	0.00	0.01	0.01
Fugitive Dust					67.79	23.18
Total Daily	**143.5143.02**	**533.02530.07**	**1309.731307.02**	**1.60**	**139.15114.46**	**67.0764.56**
Significance Threshold	*75*	*550*	*100*	*150*	*150*	*55*
Above Threshold?	Yes	No	Yes	No	No	Yes
Intakes and Overflow						
Heavy Construction Equipment	4.45	16.16	41.14	0.06	1.57	1.40
Worker Vehicles	0.20	6.22	0.59	0.01	0.11	0.05
Construction Trucks	0.260.23	1.030.90	4.103.88	0.00	0.310.18	0.180.13
Haul Truck Idling	0.02	0.09	0.08	0.00	0.00	0.00
Total Daily	**4.934.88**	**23.51123.28**	**45.9245.62**	**0.07**	**1.991.86**	**1.631.57**
Significance Threshold	*75*	*550*	*100*	*150*	*150*	*55*
Above Threshold?	No	No	No	No	No	No
RCP Interbasin Conduits						
Heavy Construction Equipment	6.95	25.94	59.74	0.09	2.44	2.17
Worker Vehicles	0.20	6.22	0.59	0.01	0.11	0.05
Construction Trucks	0.45	1.80	7.76	0.01	0.36	0.26
Total Daily	**7.61**	**33.96**	**68.09**	**0.10**	**2.91**	**2.48**
Significance Threshold	*75*	*550*	*100*	*150*	*150*	*55*
Above Threshold?	No	No	No	No	No	No
Maximum Simultaneous Emissions						
Total Daily	**156.08155.51**	**590.48587.32**	**1423.71420.73**	**1.771.76**	**144.21119.22**	**71.2268.60**
Significance Threshold	75	550	100	150	150	55
Above Threshold?	Yes	Yes	Yes	No	No	Yes
Localized Significance Threshold	N/A	1282	262	N/A	13	8
Above Threshold?	N/A	No	Yes	N/A	Yes	Yes

Table 4.1-9
Estimated Annual GHG Emissions from Construction

Source	**CO_2 metric tons** (total)	**CH_4 metric tons** (total)	**N_2O metric tons** (total)
Spreading Basins	18,051~~17,773~~	1.45	14.02~~13.95~~
Intakes and Overflow	99~~105~~	0.01	0.06
RCP Interbasin Conduits	84~~92~~	0.01	0.05
Total	**18,233~~17,962~~**	**1.46**	**14.13~~14.06~~**
Total CO_2-Equivalent Construction-related Emissions (metric tons)	**22,481~~22,189~~**		
Amortized Construction-related Emissions (metric tons per year)	**749~~740~~**		

The recalculations summarized above are estimates of project emissions before mitigation. With implementation of Mitigation Measures AIR-1 through AIR-16, emissions will be reduced.

2.4 LANDSCAPING

Upgrade of the landscaping of the TSG facility is included in the proposed project. Conceptual renderings of the proposed improvements are included below as Figures 2-3 and 2-4. The specific facilities to be installed have not been finalized but may include trails and jogging paths, trees and other plantings, and benches. Native species with low water requirements will be used as plantings to the extent feasible.

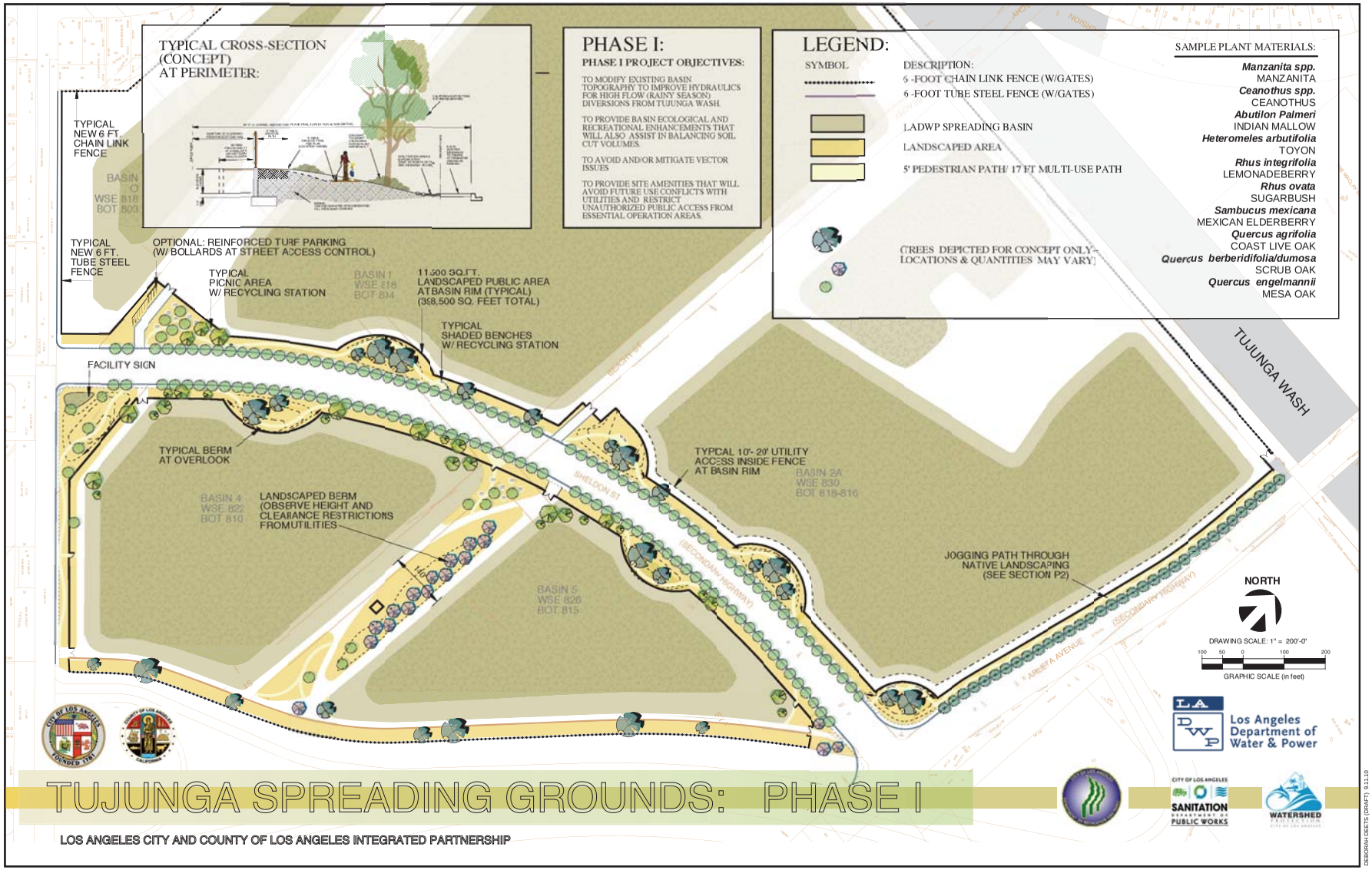
TYPICAL CROSS-SECTION (CONCEPT) AT PERIMETER:
TYPICAL NEW 6 FT. CHAIN LINK FENCE
BASIN C WSE 818 BOT 803
PHASE I:
PHASE I PROJECT OBJECTIVES:
TO MODIFY EXISTING BASIN TOPOGRAPHY TO IMPROVE HYDRAULICS FOR HIGH FLOW (RAINY SEASON) DIVERSIONS FROM TUJUNGA WASH.
TO PROVIDE BASIN ECOLOGICAL AND RECREATIONAL ENHANCEMENTS THAT WILL ALSO ASSIST IN BALANCING SOIL CUT VOLUMES.
TO AVOID AND/OR MITIGATE VECTOR ISSUES
TO PROVIDE SITE AMENITIES THAT WILL AVOID FUTURE USE CONFLICTS WITH UTILITIES AND RESTRICT UNAUTHORIZED PUBLIC ACCESS FROM ESSENTIAL OPERATION AREAS.
LEGEND:
SYMBOL
DESCRIPTION:
6 -FOOT CHAIN LINK FENCE (W/GATES)
6 -FOOT TUBE STEEL FENCE (W/GATES)
LADWP SPREADING BASIN
LANDSCAPED AREA
5' PEDESTRIAN PATH/ 17 FT MULTI-USE PATH
(TREES DEPICTED FOR CONCEPT ONLY - LOCATIONS & QUANTITIES MAY VARY)
SAMPLE PLANT MATERIALS:
Manzanita spp. MANZANITA
Ceanothus spp. CEANOTHUS
Abutilon Palmeri INDIAN MALLOW
Heteromeles arbutifolia TOYON
Rhus integrifolia LEMONADEBERRY
Rhus ovata SUGARBUSH
Sambucus mexicana MEXICAN ELDERBERRY
Quercus agrifolia COAST LIVE OAK
Quercus berberidifolia/dumosa SCRUB OAK
Quercus engelmannii MESA OAK
TYPICAL NEW 6 FT. TUBE STEEL FENCE
OPTIONAL: REINFORCED TURF PARKING (W/ BOLLARDS AT STREET ACCESS CONTROL)
TYPICAL PICNIC AREA W/ RECYCLING STATION
BASIN 1 WSE 818 BOT 804
11,500 SQ.FT. LANDSCAPED PUBLIC AREA AT BASIN RIM (TYPICAL) (358,500 SQ. FEET TOTAL)
TYPICAL SHADED BENCHES W/ RECYCLING STATION
FACILITY SIGN
TYPICAL BERM AT OVERLOOK
BASIN 4 WSE 822 BOT 810
LANDSCAPED BERM (OBSERVE HEIGHT AND CLEARANCE RESTRICTIONS FROMUTILITIES
140'
BASIN 5 WSE 826 BOT 815
TYPCAL 10'- 20' UTILITY ACCESS INSIDE FENCE AT BASIN RIM
BASIN 2A WSE 830 BOT 816-816
JOGGING PATH THROUGH NATIVE LANDSCAPING (SEE SECTION P2)
TUJUNGA WASH
SHELDON ST
(SECONDARY HIGHWAY)
ARLETA AVENUE
NORTH
DRAWING SCALE: 1" = 200'-0"
100 50 0 100 200
GRAPHIC SCALE (in feet)
Los Angeles Department of Water & Power
SANITATION
PUBLIC WORKS
WATERSHED PROTECTION
TUJUNGA SPREADING GROUNDS: PHASE I
LOS ANGELES CITY AND COUNTY OF LOS ANGELES INTEGRATED PARTNERSHIP
DEBORAH ISEETS (DRAFT) 9.11.10

Figure 2-3


PHASE II:
PHASE II PROJECT OBJECTIVES:
TO PROVIDE ENHANCED RECHARGE BASINS FOR LOW FLOW (DRY SEASON) DIVERSIONS FROM TUJUNGA WASH.
TO MODIFY EXISTING BASIN TOPOGRAPHY TO IMPROVE HYDRAULICS AND TO ASSIST IN BALANCING EXPORT FILL.
TO AVOID AND/OR MITIGATE VECTOR ISSUES
TO PROVIDE NECESSARY SITE AMENITIES THAT WILL:
DIRECT PEDESTRIAN AND VEHICULAR CIRCULATION AND MINIMIZE FUTURE USE CONFLICTS WITH MAINTENANCE
PROVIDE PERIMETER ECOLOGICAL ENHANCEMENTS PROMOTING HEALTHY SOILS BIOLOGY AND VEGETATION.
TO PROVIDE SIGNAGE OR OTHER MATERIALS THAT EDUCATE THE PUBLIC ON CRITICAL RECHARGE, STORMWATER AND COMMUNITY ISSUES (KIOSK).
PROVIDE NEW PUBLIC RECREATIONAL SPACE AND USE OPPORTUNITIES.
RTE 170
ON RAMP
SHELDON ST
OVERFLOW LINE TO BASIN 3
OPTIONAL: BERM TRAIL
BASIN 9 INFLOWS (TO 20 CFS)
STORAGE LINE TO BASIN 7
BYPASS
CAL TRANS EASEMENT
ROAD BARRIER
DUMPSTERS (& RECYCLING) ENCLOSURE
24' WIDE EXIT GATE
ONE-WAY PARKING: TREE SHADED PERMEABLE PAVING SURFACE
3'-6" RETAINING WALL AT FRONTAGE (5 FEET BEHIND PROPERTY LINE & UNDER FENCE)
BANK
BANK
STEPS (2) LOCATIONS
OVERFLOW STRUCTURES (2) LOCATIONS
5'-0" WIDE PED PATH, TYP.
OUTDOOR CLASSROOM
PICNIC AREA
KIOSK
FACILITY SIGN
24' WIDE ENTRY GATE
17' WIDE UTILITY ROAD W/ END BARRIER(S)
(5)QUALITY RECYCLING RECEPTACLES
MAINTENANCE AREA
NORTH
SCALE: 1" = 0'-0"
GRAPHIC SCALE (in feet)
LEGEND:
SYMBOL
DESCRIPTION:
6 -FOOT CHAIN LINK FENCE (W/GATES)
6 -FOOT TUBE STEEL FENCE (W/GATES)
LADWP SPREADING BASIN
LOWER TERRACE: SPARSE PLNATINGS OF CA NATIVE DROUGHT AND/OR INUNDATION TOLERANT SPP.
WATER-WISE TURF/PICNIC AREA: -UNIFORM SOD w/ SMART IRRIGATION -CALIFORNIA NATIVE DECIDUOUS AND EVERGREEN SHADE TREES
UPPER TERRACE: SCREENING TREES AND SHRUBS VINES ON FENCES AND WALLS GRAVEL
INFLOWS: -BASIN/ PRIMARY FLOW
-INFILTRATION AREAS (HATCHED)
5' WIDE PEDESTRIAN PATH
17 FT. WIDE MULTI-USE PATH
(TREES & SHRUBS DEPICTED FOR CONCEPT ONLY)
--LANDSCAPE CONCEPT-- SEE HYDRAULICS AND GRADING PLAN FOR RETAINING WALLS, CONTOURS & ELEVATIONS
Los Angeles Department of Water & Power
SANITATION
WATERSHED
TUJUNGA SPREADING GROUNDS: PHASE II
LOS ANGELES CITY AND COUNTY OF LOS ANGELES INTEGRATED PARTNERSHIP
DEBORAH GEETS (DRAFT) 9.11.10

Figure 2-4

2.5 CORRECTIONS TO THE DRAFT EIR

The following text edits are corrections to minor errors, updates, or amplifications of statements in the Draft EIR. Text inserts are shown as underlined and deletions are shown in ~~strikethrough~~ format. Draft EIR section numbers are noted in [brackets].

[Draft EIR Figure 2-2]

Draft EIR Figure 2-2 has been revised to note the approximate location of the Tujunga Wellfield. See Section 1 of this Final EIR for the revised figure.

[2.3.2 Existing On-Site Land Uses]

Adjacent to the site along the flood control channel are the 12 wells that form the Tujunga Wellfield. These wells were initially installed to increase production from the San Fernando Groundwater Basin, but were later taken off-line due to water quality issues.

[2.4.3 Integrated Regional Water Management Plan]

Managed by the Flood Control District, the purposes of the Greater Los Angeles County Integrated Regional Water Management Plan (IRWMP) are to improve water supplies, enhance water supply reliability, improve surface water quality, preserve flood protection, conserve habitat, and expand recreational access in the Region.

[2.8 Areas Of Known Controversy And Issues To Be Resolved]

CEQA Guidelines Section 15123 requires that EIRs contain a discussion of areas of known controversy and issues to be resolved. ~~There are no known areas of controversy related to the proposed project. A remaining issue to be resolved is the disposal location for excavated soils resulting from project construction.~~ The method to be used for disposal of excess soils from the site is an area of known controversy related to the proposed project. Based on comments received on the Draft EIR, a mitigation measure to convey excess soils via conveyor from TSG to Boulevard Pit has been defined. With incorporation of this Mitigation Measure (AIR-1), the majority of the soil hauling truck trips estimated in the Draft EIR will not be required.

[3.1 Project Description]

The proposed enhancement project for TSG will alter the current intake facility to capture low flows; create a treatment area for the low flows; install two new intake facilities to capture high flows from the Tujunga Wash and Pacoima Wash Channels; install devices to prevent widespread distribution of trash within the TSG; reactivate, deepen and/or combine basins to increase the facility's storage and recharge capacity; install new inter-basin flow controls; and install telemetry on new diversion facilities (**Figure 3-1)**. Modeling conducted by LADWP indicates that an average of an additional 8,000 acre-feet of stormwater per year will be captured and recharged with the enhanced facility.

[3.1.1 Existing Intake Structure]
The operation of the existing intake structure, northeast of the I-5 / SR-170 interchange, will be altered to allow only low flow through the intake and a trash rack will be installed. Low flows will pass under I-5 using the existing conveyance pipe. Under the proposed project, the abandoned basins located southeast of the freeway interchange will be improved to provide ~~treatment prior to recharging the groundwater. Water treatment will include~~ attenuation to allow for settling of larger solids prior to recharging groundwater.

[3.2.1.2 Conveyor to Boulevard Pit]
~~Installation of a conveyor system from the TSG to the adjacent Boulevard Pit (11401 W. Tuxford Street) was considered. Vulcan Materials Company owns and operates Boulevard Pit; soils would be used for on-site improvements. The conveyor would be electric-powered, and to avoid crossing the I-5, would need to be installed in the Tujunga Wash Channel. Review by project engineers determined that this alternative was logistically problematic, and could interfere with normal operation of the stormwater channel. Therefore, the alternative was rejected as infeasible and was not considered further.~~

[3.4.2 Methane Gas Monitoring]

LABOS manages the City-owned closed Sheldon-Arleta Landfill, located directly east of the TSG. Phase I of the Cesar Chavez Recreation Complex Project (completed in 2010) upgraded the landfill's methane gas extraction system to prevent methane gas migration from the landfill to adjacent properties. The system consists of vertical gas extraction wells feeding a flare station.

[3.5 RELATED PROJECTS]

~~The San Fernando Valley Groundwater Basin was adjudicated in 1979 and includes the water-bearing sediments beneath the San Fernando Valley, Tujunga Valley, Browns Canyon, and the alluvial areas surrounding the Verdugo Mountains near La Crescenta and Eagle Rock. The basin is bounded on the north and northwest by the Santa Susana Mountains, on the north and northeast by the San Gabriel Mountains, on the east by the San Rafael Hills, on the south by the Santa Monica Mountains and Chalk Hills, and on the west by the Simi Hills. The valley is drained by the Los Angeles River and its tributaries.~~ The San Fernando Basin consists of 112,000 acres and is bounded on the east and northeast by the San Rafael Hills, Verdugo Mountains, and San Gabriel Mountains; on the north by the San Gabriel Mountains and the eroded south limb of the Little Tujunga Syncline which separates it from the Sylmar Basin; on the northwest and west by the Santa Susana Mountains and Simi Hills; and on the south by the Santa Monica Mountains (ULARA Watermaster, Available: http://www.ularawatermaster.com/). Los Angeles County operates other spreading grounds to recharge the San Fernando Basin. Hansen Spreading Grounds are located just north of the project site and receive flows from Tujunga Wash. Pacoima Spreading Grounds are northwest of the TSG and recharge storm flows from the Pacoima Wash. The small Branford Basin is located immediately adjacent to the TSG upstream of the confluence of the Tujunga and Pacoima Washes. Along with TSG, these facilities percolate stormwater into the San Fernando Basin; a beneficial cumulative impact for

groundwater supplies. Operation of the other spreading basins in the area with construction of the TSG Enhancement Project would not have other, adverse cumulative impacts.

[4.1.8 Impact Significance After Mitigation] and
[5.3 Significant Environmental Impacts for Which No Feasible Mitigation is Available]

Implementation of dust control measures in compliance with SCAQMD Rule 403, including Mitigation Measures AIR-7, AIR-9 and AIR-11 through AIR-16, will substantially reduce particulate matter emissions during project construction. As mitigated, particulate emissions are predicted to be below regional significant thresholds but potentially (depending on the actual reduction efficiencies achieved for the project) above local significant thresholds. Since a wide-range of dust control measures will be incorporated into the project, additional feasible mitigation measures to further reduce particulate matter have not been identified. [Appendix C includes dust BACM Tables 1, 2, and 3 of Rule 403.]

Implementation of mitigation measures AIR-1 through AIR-~~5~~16 would reduce air pollutant emissions during project construction. All or most of the air pollutant emissions related to soil hauling will be avoided by use of a conveyor for soil disposal. However, emissions reductions that can be achieved with implementation of the other ~~these~~ measures are not quantifiable and are not anticipated to reduce emissions of ROG, CO, and NOx below levels of significance. Use of heavy construction equipment and vehicles is required in order to implement the project. ~~Additional~~ Mitigation to ~~that could~~ reduce emissions (although not necessarily below levels of significance) will include EPA Tier 3 or higher emissions standards. ~~would be to mandate specific equipment and vehicles (based on air pollutant emission levels) to be used during construction. For example, restricting the contractor from using older equipment by mandating that, from the start of construction, include all off-road diesel-powered construction equipment greater than 50 hp meet USEPA Tier 3 off-road emission standards, and that post January 1, 2015, all off-road diesel-powered construction equipment greater than 50 hp meet USEPA Tier 4 emission standards, was considered. Similarly, mandating the use of alternative fuel vehicles for soil hauling trucks was considered.~~

~~However, in order to maintain an open construction contract bidding process, specification of equipment types is considered infeasible. To ensure that contracts can be bid by a range of contractors (large and small), the County does not specify the number or types of vehicles and/or equipment to be used for construction projects.~~ Therefore, ~~there are no~~ with implementation of feasible mitigation measures, ~~that would reduce air quality impacts to below a level of significance.~~ maximum daily emissions associated with construction for the TSG Enhancement project would remain significant ~~with implementation of feasible mitigation measures~~. However, construction emissions would not have a long-term air quality impact because these emissions would cease at the completion of construction.

[5.4 Significant Irreversible Environmental Changes]

Adverse environmental effects of the project related to construction – noise, traffic and air pollutant emissions – will all cease once project construction is complete and will not result in irreversible environmental changes. However, construction of the project will require the use of heavy equipment, workers' vehicles, and a limited number of soil disposal haul trucks.

[5.6 Alternatives to the Proposed Project]

No Project

Under No Project, the spreading grounds would not be improved and there would be no disposal requirement for approximately 1.3 million cubic yards of soil. Stormwater could continue to be diverted from the Tujunga Wash under No Project, since the methane gas migration concern at the adjacent Arleta Landfill has been resolved. However, high flows from the Pacoima and Tujunga Washes could not be diverted to the spreading basins. Since the trash racks and low flow treatment area would not be constructed under No Project, water quality would not be improved. Without the project, fine soils that reduce percolation would not be removed from the bottom of the basins and additional conveyance features would not be installed to transport stormwater among basins. The maximum volume of stormwater that could be recharged to the groundwater table under No Project is limited by the existing intake (250 cfs maximum) and the existing percolation rate (140 cfs), substantially less than the volume anticipated under the project.

Under No Project, temporary construction-related air pollutants would not be emitted, noise impacts on adjacent residences would not occur, and traffic for project soil disposal (loads not suitable for transport by conveyor) would not be added to streets in the project vicinity. However, No Project does not meet the project objective of increasing stormwater recharge into the San Fernando Groundwater Basin through enhancement and operation of the TSG facility.

Soil Disposal Location Alternatives

~~Since the objective of the proposed project is to increase recharge of the San Fernando Groundwater Basin at the TSG,~~Alternatives to the proposed project focused on the off-site portion of the project with the greatest potential environmental impacts – disposal of approximately 1.3 million cubic yards of excess soil. ~~During project planning, on-site balancing of the soils, off-site disposal by conveyor, and off-site disposal via trucks traveling in the Tujunga Wash Channel were evaluated and found to be infeasible (Section 3). After elimination of these infeasible options, alternatives definition focused on several off-site disposal locations for excess soils:~~ However, with implementation of Mitigation Measure AIR-1, the majority of soils will be transported by conveyor to Boulevard Pit. Soil disposal by truck will be limited to soils that are not suitable for transport via conveyor belt (e.g., large cobbles). Alternative soil disposal locations for these loads are:

- Alternative 1 – Boulevard Pit Disposal Site
- Alternative 2 – Sheldon Pit Disposal Site
- Alternative 3 – Cal Mat Disposal Site
- Alternative 4 – Bradley Landfill and Recycling Center Disposal Site
- Alternative 5 – Combination of Soil Disposal Alternative Locations

~~LADWP has been in communication with Vulcan Materials Company regarding use of TSG soils at Boulevard Pit. This location is closest to the TSG and the excess soils may be able to be used for a construction project at the Boulevard Pit. Therefore, it is the preferred alternative~~. Environmental impacts of the various disposal locations are:

Air Quality – All of the disposal sites are near the project. The Boulevard Pit disposal site is closest to the TSG, directly northeast of the site. This alternative would require the least amount of truck travel. Alternatives 2, 3 and 4 are along Sheldon Street northeast of the project site. Travel to these alternative sites would require the longest truck travel distance. Air pollutant emissions would be slightly higher for Alternatives 2, 3, and 4 than for Alternative 1, which involves the shortest travel distance. Under any of the alternatives, including using more than one of the disposal options, air pollutant emissions would be temporarily significant as mitigated.

Noise – Significant noise impacts from project construction would occur during normal working hours at residential receptors adjacent to the TSG. The soil disposal location selected for soils that are not suitable for transport via conveyor belt would not impact the noise levels from the on-site construction equipment. Mobile noise generated during soil hauling activities will be less than significant under all alternatives. However, Alternative 1, Boulevard Pit, would require the least amount of truck travel and therefore it would generate the least amount of mobile noise.

Traffic – Under the worst-case assessment with all soil disposal via truck, all four soil disposal location alternatives would have similar impacts on existing traffic and future (2015) traffic conditions. Under scenario 1 (trucks using driveway off Sheldon Street), Alternative 1 (Boulevard Pit) would not only adversely impact Sheldon Street and Roscoe Boulevard (as would the other three alternatives) but it would also impact the intersection of Arelta Avenue and Sheldon Street. However, none of the predicted impacts (existing or future conditions) to intersections in the project vicinity under any of the alternatives would result in LOS E or F (normally unacceptable) and all impacts would be temporary, limited to project construction. Additionally, with implementation of Mitigation Measure AIR-1, the majority of the truck trips analyzed in the traffic analysis would not occur and soil hauling by truck would be limited to soils that are not suitable for transport via conveyor belt.

Environmentally Superior Alternative

As compared with No Project, the proposed project with any of the identified soil disposal options is considered the environmentally superior alternative. No Project would not result in noise impacts on adjacent residences during construction, add traffic to area streets, or result in significant air pollutant emissions. However, all of the adverse impacts identified for the project are temporary and will be mitigated as feasible. No Project would not allow the capture of

additional stormwater from the Tujunga and Pacoima Washes, would not recharge additional water to the San Fernando Groundwater Basin, and would not increase local water supplies. Under No Project, environmental impacts (e.g., energy use, and related air pollutant emissions) could result from well pumping, and transport and treatment of additional imported water supplies. In the context of existing water shortages in the Los Angeles area, the long-term benefit of operation of the proposed project outweighs the short-term adverse impacts related to project construction. Therefore, the proposed project is the environmentally superior alternative.

The Boulevard Pit soil disposal location is closest to the TSG and therefore will require the least truck travel during project construction. With implementation of Mitigation Measure AIR-1, the majority of the truck trips analyzed in the traffic analysis would not occur and soil hauling by truck would be limited to soils that are not suitable for transport via conveyor belt. ~~While this will decrease air pollutants emitted, this alternative has a slightly greater impact on traffic at one intersection (Arleta Avenue and Sheldon Street).~~ All of the soil disposal alternatives would have the same level of impact on noise on residences adjacent to the project site. The Boulevard Pit alternative would have slightly less mobile noise impacts. Overall, since the differences in the impacts associated with the alternative soil disposal locations are minimal, all of the alternatives are considered comparable in their level of environmental impact. Therefore, the proposed project with any of the soil disposal alternatives (or a combination of locations) is the environmentally superior alternative.

[6.1 REFERENCES AND BIBLIOGRAPHY]

City of Los Angeles v. City of San Fernando, et al. 1979. Superior Court of the State of California for the County of Los Angeles Judgment No. 650079. January 26, 1979.

City of Los Angeles. 2012. Sheldon-Arleta Landfill (File No. 60-100): Report of Waste Discharge (ROWD). Submitted to: Los Angeles Regional Water Quality Control Board. October 30, 2012.

Section 3 – Responses to Comments on the Draft EIR

Section 3
Responses to Comments on the Draft EIR

3.1 ORAL COMMENTS RECEIVED AT THE PUBLIC MEETING AND RESPONSES TO COMMENTS

A public meeting for the Tujunga Spreading Grounds Enhancement Project (proposed project) was held at 6:00 p.m. on September 12, 2012 at the LADWP Truesdale Facility: 11781 Truesdale Street, Room 205/211, Sun Valley, California 91352. In addition to staff from LADWP, Los Angeles County, MWH and Fehr & Peers, 10 individuals attended, including representatives of local neighborhood councils and City of Los Angeles Council District 6; the sign-in sheet is attached as FEIR Appendix B. The meeting included a presentation to review project history, project elements, and environmental impacts. Several graphics were on display during the meeting to illustrate the proposed changes to the spreading grounds, including conceptual plans for project landscaping.

Comments made during the meeting and responses to comments are summarized in **Table 3-1**.

Table 3-1
Response to Comments Received at the Public Meeting

Oral Comments	Responses to Comments
• Notification of the public meeting was not sufficient.	The Draft EIR and the Notice of Availability (NOA) (including notice of the public meeting) were provided to the State Clearinghouse (15 copies), 14 agencies, 3 neighborhood councils (Sun Valley, North Hollywood, and Arleta), and City Council District 6. The NOA was provided to 31 organizations and 328 adjacent property owners. Notice of the public meeting was published in the Los Angeles Times on August 16, 2012. CEQA requirements regarding notice of public environmental documents were exceeded.
• The Draft EIR should have been sent to the Sun Valley Library reference section.	Draft EIR was originally submitted to three libraries in the project area (Panorama City, Valley Plaza, and Pacoima) on August 16, 2012. Three copies of the Draft EIR were submitted to the Sun Valley Library on September 13, 2012.
• An extension of the public review period for 30 days was requested.	The public review period was extended 30 days – the comment period closed on October 31, 2012.
• Notice of the public meeting should have been translated to Spanish; translation of the EIR, or at least the Executive Summary, should also be done.	The Executive Summary was translated to Spanish and posted to the LADWP website.

Oral Comments	Responses to Comments
• Neighborhood Councils would like to provide additional input on the landscaping design. An inquiry was made concerning who is going to install the landscape elements.	A private contractor will install the landscape elements in the final weeks of the construction period. Due to TSG being an operating facility, landscape elements are limited to passive recreation such as walking paths, etc.
• Traffic analysis should consider the Bradley and Athens transfer station projects – total of 1,800 truck trips to be added from these projects.	Implementation of Mitigation Measure AIR-1 will require soil disposal via conveyor for the majority of soil generated from project construction. However, response to the comment as related to project impacts before mitigation is presented below. The traffic impact analysis for the Draft EIR included traffic associated with known related projects, based on information provided by LADOT, and an ambient growth factor of 2%/year (8% total) to account for traffic growth unrelated to the proposed project. The trip generation estimate cited in the comment cannot be verified. Neither of the projects mentioned in the comment at the public meeting were among the related projects identified by LADOT, which are listed in Table 5 in Appendix E to the Draft EIR. The draft EIR for the Bradley Landfill project anticipated that in 2012 the recycling center and transfer station on the site following closure of the landfill would generate approximately 2,440 daily trips, including approximately 220 in both the AM and PM peak hours. The draft EIR for the Athens Sun Valley Material Recovery Facility (north of Pendleton Street & Glenoaks Boulevard) estimated that in 2008 the project would generate approximately 376 daily trips, including approximately 110 in both the AM and PM peak hours. The current implementation status of these projects is not known, but for the purpose of responding to this comment it is conservatively assumed that none of their traffic was included in the June 2011 baseline traffic counts used in the TSG Draft EIR. The project trip assignments from these EIRs were reviewed as they relate to analyzed locations in the DEIR for the proposed Tujunga Spreading Grounds project (Study intersections 6, 7, 8 and 12). The forecast levels of service "with project" at these intersections in the TSG Draft EIR ranges from LOS A to LOS C and the project increment is 0.012 or less. A review of the total volume of traffic added from the Bradley and Athens projects at the intersections analyzed in the TSG Draft EIR is approximately 180 or fewer trips. Not all of these trips would be "critical" movements that contribute to the calculated V/C, and if those trips were added to the TSG Draft EIR calculations, the level of service would not decline beyond LOS D. Given the magnitude of project-related trips at these locations, and the relatively good LOS forecast there, the addition of traffic related to the Bradley and Athens projects would not alter the

Oral Comments	Responses to Comments
	conclusions of the TSG Draft EIR regarding the significance of temporary traffic impacts or required mitigation measures.
• Traffic analysis should consider an adjacent skate park – planned for construction in 9 months. The condominium project at 12501 Sheldon Street (Draft EIR Section 3.5, Table 3-2) is not going forward.	The traffic analysis considered increased traffic of 2% per year from 2011 to 2015 (8% total) and additional traffic from the list of related projects provided by LADOT. Since a skate park would not generate as many vehicle trips as the condominium project, the impact analysis is considered conservative.
• Traffic backups are noted for the intersection of Arleta Avenue & Sheldon Street.	The traffic analysis considered existing conditions at 17 intersections (Draft EIR Section 4.3.2.1). It is noted that the southbound approach on Arleta Avenue is currently narrowed due to improvements to SR 170.
• Overlap of the project with on-going freeway improvement work by Caltrans should be described.	Caltrans is building an HOV lane in each direction of I-5 between SR-170 and north of Buena Vista Street in Burbank, which has resulted in the temporary lane narrowing and freeway ramps in this area. Work began in early 2011 and is expected to be completed in late 2014. The traffic counts collected for the proposed project were conducted when all of the freeway ramps close to the TSG site were open. Construction of the proposed TSG project is planned to begin as early as late 2013 and could potentially overlap with the Caltrans project by up to 1 year. Because none of the potential haul routes analyzed in the TSG Draft EIR use the freeway, these construction projects would not affect each other. Additionally, with implementation of Mitigation Measure AIR-1, few, if any, soil haul truck trips will be required.
• PM_1 emissions during construction of the project should be analyzed.	As noted in Draft EIR Section 4.1.4, SCAQMD Air Quality Regional Significance Thresholds and Local Significance Thresholds have been established for PM_{10} and $PM_{2.5}$. Therefore, these are the two dust size categories considered for the air quality analysis.
• Construction equipment should be required to be CNG / LNG.	Since the majority of soil transport will be via conveyor, alternative fuel vehicles for minor soil hauling may be used, but will not be mandated.
• Should consider hauling dirt at night.	Night work would be outside allowable hours per the City's noise ordinance.
• Roadway surfaces will be degraded by soil hauling. Streets along the haul route should be resurfaced before the project starts, and then again at the end of the project.	As noted in Draft EIR Section 4.3.4.1, the City of Los Angeles Department of Public Works Bureau of Street Services will monitor road conditions during construction of the project, and implement repairs as necessary. However, since the majority of soil disposal will be via conveyor, significant deterioration of area roadways is not anticipated.

Oral Comments	Responses to Comments
• Several schools are located in close proximity to the project. There is a new school building for 9th graders; a methane monitor is needed at this location. Students will be sensitive receptors for air pollutants emitted during project construction.	As noted in Draft EIR Section 2.3.1, the Richard E. Byrd Middle School and the J.H. Francis Polytechnic High School are located less than 0.2 miles east of the TSG. The health risk assessment for diesel particulates (Draft EIR Section 4.1.5.3 and Appendix A of the Final EIR) considered the proximity of sensitive receptors. Impacts will not exceed SCAQMD thresholds. Draft EIR Section 3.5, Table 3-2, notes a proposed school on Arleta Avenue as a related project. The JHF Polytechnic High School Freshman Center is now open and lies adjacent to the Richard E. Byrd Middle School. Also in the vicinity is Sun Valley High School at the corner of Sheldon Street and Telfair Avenue. Please note that new construction at the school sites has been built in conformance with applicable California Building Code requirements for the construction of buildings near former landfill sites.
• Mesh screening should be installed on the perimeter fence during construction as a visual shield and dust control measure.	The Construction specifications will include a requirement for fabric mesh to be installed on the fences near active work areas to shield views of the construction activity.
• Increased groundwater volume may impair groundwater quality if water reaches landfilled wastes. This was an issue for increased recharge at the Hansen Spreading Grounds.	The Sheldon-Arleta Landfill encompasses about 41 acres and was operated from February 1962 to July 1974 as a Class III sanitary landfill. The landfill received approximately 3 million tons of residential and commercial refuse. Since July 1974, the City of Los Angeles Bureau of Sanitation has been performing the necessary post-closure maintenance work. The City of Los Angeles completed a Solid Waste Assessment Test (SWAT) report in 1987 for the Sheldon-Arleta Landfill and submitted the SWAT to the RWQCB. The SWAT concluded that the landfill does not contaminate the groundwater, however continued monitoring of the groundwater wells, the leachate wells and the effects of the spreading by the adjacent TSG was recommended. The current monitoring and control systems at the Sheldon-Arleta Landfill consist of a groundwater monitoring system; a stormwater drainage control system; and a gas collection, monitoring and control system. Prior to placement of waste, the City placed an 8-foot thick layer of permeable clay on three sides of the landfill pit to 760 feet amsl. From this elevation it is lined with 6 feet of clay to 830 feet amsl, the final elevation of refuse. The sides are tied in to the bottom of the landfill which is lined with over 15 feet of clay. Based on monitoring results, the subsurface clay barrier and final cover have adequately isolated the refuse cell from significant amounts of water from both TSG and stormwater infiltration. Water is prevented from entering the refuse cell by (1) maintaining the water levels below 700 MSL in both DWP wells 4897A and 4897B during TSG operation so no water can enter through the sides of the landfill and (2) maintaining the cover to facilitate run-off

Oral Comments	Responses to Comments
	from the site and evapotranspiration to minimize stormwater infiltration. Therefore, based on the existing clay barrier, management practices at the landfill and groundwater monitoring program, groundwater contamination from the closed Sheldon-Arleta Landfill from increased recharge at TSG is not anticipated.
• The landscaped area should be maintained. The aesthetics of the site are currently poor.	Upgrade of the landscaping of the TSG facility is included in the proposed project. Conceptual renderings of the proposed improvements are included in Section 2 of the Final EIR. The specific facilities to be installed have not been finalized, but may include trails and jogging paths, trees and other plantings, and benches. Native species with low water requirements will be used as plantings to the extent feasible. Landscape maintenance is noted in the Draft EIR (Section 3.4). In the future, maintenance of the landscaping around the TSG will be completed by the operators of the site, Los Angeles County.

3.2 WRITTEN COMMENTS RECEIVED ON THE DRAFT EIR AND RESPONSES TO COMMENTS

Thirty-one comment letters were received on the Draft EIR. Copies of the letters follow with responses to comments included after each letter. A list of persons, organizations, and public agencies commenting on the draft EIR is included in FEIR Appendix B. Additionally, a petition concerning the proposed project was received entitled, "Petition to Oppose Diesel Emissions Process of the LADWP Tujunga Spreading Grounds Enhancement Project". A copy of the petition is included in FEIR Appendix C. In response to comments received on the Draft EIR, including the petition, mitigation measures have been revised. LADWP and Los Angeles County have re-evaluated the feasibility of soil transport via conveyor for the TSG project. Mitigation Measure AIR-1 has been defined and will be adopted for the proposed project. Under this Mitigation Measure, the majority of soils excavated as part of project construction will be transported off-site via an electric-powered conveyor system to Boulevard Pit near the intersection of Laurel Canyon Boulevard and Tujunga Wash Channel (please see Final EIR Section 2).

NATIVE AMERICAN HERITAGE COMMISSION
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ds_nahc@pacbell.net

Letter #1

August 20, 2012

Mr. Hal Messinger, Environmental Planner
Los Angeles Department of Water & Power
111 North Hope street, Room 1044
Los Angeles, CA 90012

Re: SCH#2012021028; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the **"Tujunga Spreading Grounds Enhancement Project;"** located adjacent to the Sheldon-Arieta Landfill in the northeast portion of the San Fernando Valley; City of Los Angeles; Los Angeles County, California.

Dear Mr. Messinger:

The Native American Heritage Commission (NAHC) is the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3rd 604).

This letter includes state and federal statutes relating to Native American historic properties or resources of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9.

1-1 The California Environmental Quality Act (CEQA – CA Public Resources Code 21000-21177, amendments effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including …objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. The NAHC recommends that the lead agency request that the NAHC do a Sacred Lands File search as part of the careful planning for the proposed project.

1-2 The NAHC "Sacred Sites,' as defined by the Native American Heritage Commission and the California Legislature in California Public Resources Code §§5097.94(a) and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254 (r).

1-3 Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway. Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you make contact with the list of Native American Contacts on the attached list of Native American contacts, to see if your proposed project might impact Native American cultural resources and to obtain their recommendations concerning the proposed project. Pursuant to CA Public Resources Code § 5097.95, the NAHC requests cooperation from other public agencies in order that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties, including archaeological studies. The NAHC recommends *avoidance* as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native

1-4 American cultural resources and Section 2183.2 that requires documentation, data recovery of cultural resources.

Furthermore, the NAHC if the proposed project is under the jurisdiction of the statutes and regulations of the National Environmental Policy Act (e.g. NEPA; 42 U.S.C. 4321-43351). Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 *et seq*), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 *et seq.* and NAGPRA (25 U.S.C. 3001-

1-5 3013) as appropriate. The 1992 *Secretary of the Interiors Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior's *Standards* include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to "research" the cultural landscape that might include the 'area of potential effect.'

Confidentiality of "historic properties of religious and cultural significance" should also be considered as protected by California Government Code §6254(r) and may also be protected under Section 304 of he NHPA or at the Secretary of the Interior discretion if not eligible for

1-6 listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APEs and possibility threatened by proposed project activity.

Furthermore, Public Resources Code Section 5097.98, California Government Code

1-7 §27491 and Health & Safety Code Section 7050.5 provide for provisions for inadvertent discovery of human remains mandate the processes to be followed in the event of a discovery of human remains in a project location other than a 'dedicated cemetery'.

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their

1-8 contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

1-9 Finally, when Native American cultural sites and/or Native American burial sites are prevalent within the project site, the NAHC recommends 'avoidance' of the site as referenced by CEQA Guidelines Section 15370(a).

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

Sincerely,

Dave Singleton
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List

Native American Contacts
Los Angeles County
August 20, 2012

Beverly Salazar Folkes
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Thousand Oaks, CA 91362
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805 492-7255
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Fernandeno Tataviam Band of Mission Indians
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Fernandeno
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(805) 905-1675 - cell

Chumash
Fernandeño
Tataviam
Shoshone Paiute
Yaqui

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2012021028; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Tujunga Spreading Grounds Enhancement Project; located in the northeast sector of the San Fernando Valley; Los Angeles County, California.

Letter #1

Dave Singleton, Program Analyst
Native American Heritage Commission
915 Capitol Mall, Room 364
Sacramento, CA 95814

1-1 The potential for cultural resources to be present on the TSG project site was assessed in 2009 by BonTerra Consulting. The Tujunga Spreading Grounds Enhancement Project Cultural Constraints Assessment is included as Appendix B of the Initial Study (contained in Appendix A of the Draft EIR).

1-2 A Sacred Lands File Search was requested of the NAHC. The search failed to indicate the presence of Native American cultural resources with the project area; however, sacred sites were identified in close proximity to the project.

1-3 A list of Native American individuals/organizations that may have knowledge of cultural resources in the project area was provided by the NAHC on February 21, 2012 (comment letter on the Notice of Preparation for the TSG project). All individuals and tribes on the list were mailed a letter affording them an opportunity to comment on the project and share any knowledge they have of cultural resources in the project vicinity. No responses were received.

1-4 No cultural resources are known for project site, therefore avoidance of known resources is not relevant for the proposed project. However, Mitigation Measure CR-1 will be adopted as part of the project to train construction personnel on the identification of possible archaeological and paleontological resources.

1-5 Federal permitting for the proposed project may include Clean Water Act Section 404 and 33 USC Section 408 review. The need for NEPA documentation has not yet been determined. However, no cultural resources are known for the project site.

1-6 No cultural resources are known for the project site.

1-7 Mitigation Measure CR-2 will be adopted as part of the project to protect cultural resources in the event of inadvertent discovery of human remains.

1-8 All individuals and tribes on the NAHC list were mailed a letter affording them an opportunity to comment on the project and share any knowledge they have of cultural resources in the project vicinity. No responses were received.

1-9 Please see response to comment 1-4.

CALIFORNIA
Water Boards

EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIQUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

Letter #2

SEP 2 0 2012

In Reply Refer to:
KDM:266.0

Mr. Hal Messinger
Los Angeles Department of Water and Power
111 North Hope Street, Room 1044
Los Angeles, CA 90012

Dear Mr. Messinger:

DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR THE TUJUNGA SPREADING GROUNDS ENHANCEMENT PROJECT (SCH #2012021028) IN LOS ANGELES COUNTY

State Water Resources Control Board (State Water Board), Division of Water Rights (Division) staff has reviewed the DEIR for the subject project. The project involves diverting stormwater from the Tujunga Wash Channel using a rubber dam and distributing it through the Tujunga Spreading Ground facility using a canal system. An average of 8,000 acre-feet per year will be captured and recharged.

2-1 Based on the information provided in the DEIR, it appears the project may require a water right approval. The Applicant should contact the Division to determine whether a water right permit or other water right approval is needed. Information on water rights and the permitting process can be found on the Division's website at: http://www.waterboards.ca.gov/waterrights/

2-2 If a water right approval is needed, the State Water Board will act as a Responsible Agency for this project. Accordingly, the State Water Board may need to rely on the Lead Agency's California Environmental Quality Act (CEQA) document to support the Division's evaluation of the requested approval. The Lead Agency should therefore ensure that any CEQA document prepared for the project considers all potential direct and indirect environmental impacts associated with the diversion and use of water. Division staff was unable to identify any evaluation of potential impacts to Tujunga Wash Channel resources. Potential impacts to instream resources should be evaluated and mitigated.

If you have any questions, please contact Katherine Mrowka at (916) 341-5363 or by email at kmrowka@waterboards.ca.gov. Written correspondence or inquiries should be addressed as follows: State Water Resources Control Board, Division of Water Rights, Attn: Katherine Mrowka, P.O. Box 2000, Sacramento, CA, 95812-2000.

PHILLIP CRADER, MANAGER
PERMITTING AND LICENSING SECTION
DIVISION OF WATER RIGHTS

Letter #2

Phillip Crader, Manager
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

2-1 The City of Los Angeles possesses an existing right to the waters of the Pacoima Wash and Tujunga Wash, as they are tributary to the Los Angeles River and within the Upper Los Angeles River Area (ULARA) and therefore subject to the City's Pueblo water right. Once implemented, LADWP will file a statement of diversion with the State Board.

The Pueblo right is a usufructuary water right. "The Pueblo right is the highest priority right to the use of the native water supply lying within the boundaries of the historic pueblo for the reasonable and beneficial needs of the municipal successor to the Spanish/Mexican pueblo.", Scott C. Slater, California Water Law and Policy. "Under the treaty of Guadalupe Hidalgo, executed by Mexico and the United States, the municipal successors to Spanish/Mexican pueblos were entitled to exercise preexisting rights following the cession of California.", Weil, Water Rights in the Western States. The courts have continually upheld the pueblo rights of the City of Los Angeles. Ruling in favor of the City the court in the case City of Los Angeles v. Los Angeles Farming & Mining Co, (1908) 152 Cal. 645, 648-651 stated, "The pueblo right is deemed the highest priority right to a surface water supply." Similarly in a ruling in favor of the City the court in City of Los Angeles v. City of Glendale, (1943) 23 Cal. 2d 68, the court stated," The right has a higher priority use than any other right arising under California law. The courts have ruled that the treaty of Guadalupe, and the land patents, confirm rights previously accrued under a former sovereignty." The Glendale court also states, "The Water Code is not applicable to the acquisition of pueblo rights authorized and confirmed by procedures in existence prior to the adoption of the Water Code in 1914." Id at 75-76.

"The ULARA is the entire water shed of the Los River and its tributaries above Gauging Station No.F57, which is located just above the junction of the river and the Arroyo Seco, near the intersection of North Figueroa Street and San Fernando Road and the intersection of the Pasadena and Golden State Freeways. The ULARA is bounded by the crests of mountain ranges: the Santa Susana Mountains and San Gabriel Mountains on the north; the San Gabriel Mountains, San Rafael Hills, and Repetto Hills on the east; the Elysian Hills and Santa Monica Mountains on the south; and the Simi Hills on the west." *City of Los Angeles vs. City of San Fernando (1975) 14 Ca. 3rd 199, 208*. The California Supreme Court has determined that the City of Los Angeles has a pueblo right to all of the waters tributary to the Los Angeles River.

2-2 As noted above, LADWP already possesses the water rights necessary for project operation. Please note that the Tujunga and Pacoima Washes at this location are concrete-lined channels.

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, REGIONAL PLANNING
IGR/CEQA BRANCH
100 MAIN STREET, MS # 16
LOS ANGELES, CA 90012-3606
PHONE: (213) 897-9140
FAX: (213) 897-1337

Flex your power!
Be energy efficient!

Letter #3

September 26, 2012

Mr. Hal Messinger
Los Angeles Department of Water and Power
111 North Hope Street, Room 1044
Los Angeles, CA 90012

IGR/CEQA No. 120824AL-DEIR
Tujunga Spreading Grounds Enhancement Project
Vic. LA-05/PM 36.34, LA-170/PM R19.72
SCH #: 2012021028

Dear Mr. Messinger:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project is an enhancement project for Tujunga Spreading Grounds (TSG). The objective of the Tujunga Spreading Grounds Enhancement Project is to increase stormwater recharge into the San Fernando Groundwater Basin through enhancement and operation of the TSG facility.

3-1 Please be reminded that any work performed within the State Right-of-way will require an Encroachment Permit from the Department. Any modifications to State facilities must meet all mandatory design standard and specifications.

3-2 Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State highway facilities without any storm water management plan.

3-3 Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from the Department. It is recommended that large size truck trips be limited to off-peak commute
3-4 periods. In addition, a truck/traffic construction management plan is needed for this project.

If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 120824AL.

Sincerely,

DIANNA WATSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

Letter #3

Dianna Watson, IRG/CEQA Branch Chief
California Department of Transportation
100 Main Street
Los Angeles, CA 90012-3606

3-1 An Encroachment Permit application will be submitted to Caltrans for installation of conveyance facilities under State Highways (DEIR Table 2-2).

3-2 Construction of the project will be completed in compliance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, NPDES NO. CAS000002) (DEIR Table 2-2). Per the General Permit, a Storm Water Pollution Prevention Plan (SWPPP) incorporating best management practices (BMPs) for erosion control will be developed and implemented during project construction.

3-3 A permit application will be submitted to Caltrans for use of heavy equipment on State Highways, as applicable during mobilization of equipment (DEIR Table 2-2). With the addition of Mitigation Measure AIR-1, the majority of soils excavated as part of project construction will be transported off-site via an electric-powered conveyor system to Boulevard Pit near the intersection of Laurel Canyon Boulevard and Tujunga Wash Channel. Therefore, the majority of large size trucks needed for the project will travel to the site at the start of the construction period and remain on-site during construction. The Construction specifications will include the requirement to transport large equipment to the site during off-peak commute periods.

3-4 Mitigation Measure TR-1 requires the preparation of a construction traffic management plan. With use of the conveyor for the majority of soil disposal from the site, Mitigation Measure TR-1 will apply to haul trips necessary for material loads not suitable for disposal at Boulevard Pit. Mitigation Measure TR-2 requires the preparation and implementation of a site-specific construction traffic control plan for construction activities within public street right-of-way around the project site.

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

Letter #4

E-MAILED: OCTOBER 5, 2012 October 5, 2012

Los Angeles Department of Water and Power
Attn: Mr. Hal Messinger, Hal.Messinger@ladwp.com
111 North Hope Street, Room 1044
Los Angeles, CA 90012

Draft Environmental Impact Report (Draft EIR) for the Proposed Tujunga Spreading Grounds Enhancement Project (SCH #2012021028)

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document and would also like to thank the lead agency for the additional time to submit comments. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final CEQA document.

In the project description, the lead agency proposes construction improvements within the existing 160-acre Tujunga Spreading Grounds (TSG) in order to increase the facility's storage and recharge capacity. This will be accomplished by altering intake facilities and by deepening and/or combining spreading basins. In addition, two new intake facilities will be built. Soil disturbance will include activities to reactivate, deepen, and/or combine basins to increase the facility's storage and recharge capacity. Construction would also involve the disposal of approximately 1.3 million cubic yards of excess soil to disposal sites located near the project.

In the Air Quality Section, the lead agency quantified the project's construction air quality impacts and has compared those impacts with the AQMD's recommended daily significance thresholds. In its analysis, the lead agency concluded that short-term impacts significantly exceed regional and localized thresholds for ROG, NOx and PM2.5, primarily from combustion equipment emissions. On page 4.1-21 of the Draft EIR, the lead agency proposes mitigation measures to reduce these impacts but considered some measures infeasible: specifically, the measures that required project equipment types to meet higher tiered emission standards based on engine size and a compliance schedule.

4-1 The AQMD staff is concerned that although the lead agency considered the tiered equipment mitigation requirements for their feasibility, the Draft EIR does not present substantial evidence that these measures are, in fact, infeasible. The AQMD staff therefore recommends that the Final EIR include a discussion of the availability of this equipment by potential contractors since other lead agencies with similar projects have included these measures to reduce equipment emissions from these sources as project

4-1 requirements. If this equipment is determined to be available, these tier schedule conditions can be included as project requirements as mitigation in the Final EIR. Finally, several portions of the air quality analysis should be reviewed and revised to include all relevant sources, and to identify additional opportunities for project mitigation.

4-2 Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The AQMD staff encourage the lead agency and/or its air quality consultant to confer with us prior to publishing the Final EIR to ensure that air quality concerns are appropriately addressed. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Ian MacMillan
Program Supervisor, Inter-Governmental Review
Planning, Rule Development & Area Sources

IM:GM
Attachment

LAC120816-02
Control Number

4-3 **Construction Air Quality Mitigation Measures**

1. In the air quality analysis, project construction impacts exceed the recommended daily regional and localized significance thresholds for emissions including ROG, NOx and PM2.5. The lead agency has cited compliance with AQMD Rule 403 – Fugitive Dust on page 4.1-18 stating that the project would be considered a large operation under Rule 403. Compliance would emphasize dust control and a person would be identified to supervise implementation of dust control measures from Rule 403. Beyond listing Rule 403 as the focus, the lead agency did not detail which measures from Rule 403 it would implement. Therefore, the lead agency is reminded that complying with a rule, regulations, law, etc., should not be considered mitigation if it is required. The lead agency should instead, include the specific measures from Rule 403 that will be implemented into the proposed project and incorporate those measures into the project-specific impact calculations.

   The AQMD staff further recommends the following measures to further reduce air quality impacts from the project, if feasible:

   Recommended Additions:

   ROG, NOx and PM2.5

   - Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NOx emissions requirements;
   - Prohibit truck idling in excess of five minutes, on- and off-site;
   - Use street sweepers that comply with SCAQMD Rules 1186 and 1186.1;
   - Use electricity from power poles rather than temporary diesel or gasoline power generators;
   - Traffic speeds on all unpaved roads to be reduced to 15 mph or less; and
   - Reroute construction haul trucks away from congested streets or sensitive receptor areas.

   PM2.5 (Fugitive Dust)

   - Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more);
   - Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph;
   - Apply water three times daily, or non-toxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces;

4-3

- Sweep streets at the end of the day if visible soil is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water);
- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip.
- Replace ground cover in disturbed areas as quickly as possible;
- Water active sites at least twice daily; and
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered.

2. Further, other lead agencies in the region including LA County Metro[1], the Port of Los Angeles, and the Port of Long Beach have also enacted the following mitigation measures discussed and considered by the lead agency in the Draft EIR. Based on other agency's implementation of these measures, the AQMD staff recommends reconsideration of these measures after the lead agency has researched the equipment's availability with contractors likely to bid on the proposed project. Given the significance of impacts both regionally and locally, the lead agency should also investigate incentives that may allow all potential contractors to use higher tiered equipment.

Construction Equipment Mitigation Measures

3. Should the lead agency determine that area contractors have equipment available that meets the EPA tier standards according to the following schedules (see cover letter starting in paragraph three), the AQMD staff reiterates the following additional mitigation measures to further reduce ROG, NOx and PM2.5 emissions, if feasible:

   - Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NOx emissions requirements,

   - Consistent with measures that other lead agencies in the region (including Port of Los Angeles, Port of Long Beach, Metro and City of Los Angeles)[2] have enacted, require all on-site construction equipment to meet EPA Tier 3 or higher emissions standards according to the following:

     ✓ Project start, to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

[1] For examples see the Metro Green Construction Policy at: http://www.metro.net/projects_studies/sustainability/images/Green_Construction_Policy.pdf

[2]

4-3

- ✓ Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy ~~fo~~r a similarly sized engine as defined by CARB regulations.
- ✓ A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

- ✓ Encourage construction contractors to apply for AQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for AQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website: http://www.aqmd.gov/tao/Implementation/SOONProgram.htm

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

Air Quality Calculations

4-4

4. AQMD staff identified a number of deficiencies in the Draft EIR air quality analysis. These emissions sources must be quantified, and given the significance of impacts, all feasible mitigation measures must be implemented to reduce these impacts to the maximum extent. Each of the items below has specific, quantifiable, and enforceable mitigation measures that can reduce this source of emissions.

- Idling emissions – With 128 average truck trips per day, there will undoubtedly be substantial idling as these trucks queue when they wait to pick up and drop off their loads, and potentially at site entrances and exits. These idling emissions must be included in regional and localized emissions estimates, as well as in the HRA. AQMD staff recommends an idling time of at least 15 minutes per trip to account for multiple idling points per trip (e.g., entrance, wheel washing at exit, waiting for a load, etc.).

    - Mitigation measures could include enforcing stringent anti-idling policies for both trucks and construction equipment onsite.

- Truck speeds – The air quality analysis assumes that trucks would travel 30 mph for the regional emissions analysis, and 45 mph for the HRA. Both of these speeds seem overestimated given that truck travel onsite should be considerably lower and it is not clear that trucks will be able to travel this speed on the arterial streets. Emissions factors are typically higher at slower speeds, so the emission

4-4

estimates would be expected to increase with this correction. The air quality analysis should include emissions estimates for truck travel onsite, at the disposal site, and speeds on the arterials.

- Mitigation measures could include implementing traffic controls on the arterials to smooth traffic flow. These could include providing dedicated turn lanes, flagmen, synchronized traffic lights, signage, etc.

- Unpaved road dust – The air quality analysis did not include any estimates of fugitive dust generated by trucks traveling over unpaved roads onsite or at the disposal site. Emissions from this activity may be substantial and should be quantified in the revised air quality analysis.

  - Mitigation measures could include applying soil stabilizers to unpaved roads, reducing vehicle speeds onsite, and reducing the length of unpaved roads onsite.

- Paved road dust – The paved road dust calculation relies on an old version of EPA's AP-42 guidance. The updated equation from the 2011 guidance should be used in the revised air quality analysis. The silt loading factor should be carefully considered given that this project may contribute substantially to silt loading on the local roads.

  - Mitigation measures could include requiring wheel washers, rumble grates, and multiple street sweeper passes per day. Alternatively, there may be opportunities to use a conveyance system to reduce the amount of truck travel.

- Fugitive dust from construction equipment – Fugitive dust calculations in the air quality analysis were only performed for material handling and dozing activities. Given the amount of earth movement onsite, it is not clear if these calculations capture all potential fugitive dust that might be generated from this project. For example, scraper activities may have significantly higher emissions that aren't captured by the included calculations. AQMD staff requests that the lead agency's air quality consultant confer with AQMD staff to discuss appropriate calculation methodologies for the proposed project activity.

  - Mitigation measures could include limiting the amount of activity that occurs on a daily basis, especially in specific areas that are located closer to sensitive receptors.

- HRA sources – The HRA only included emission sources associated with diesel emissions from offsite truck travel. As the bulk of emissions from this project will occur from onsite activities, these sources must be added to the dispersion model to estimate potential health risk impacts.

- By including these sources in the HRA, additional mitigation measures may become apparent with the more refined analysis. 4-4

- HRA emission rate calculations – AQMD staff is unclear about all of the variables used to estimate diesel emissions for the HRA. In particular, a factor of 0.031is included in the 'Average Diesel Particulate, total lbs' calculation that is unexplained. It is also unclear how the calculated emission rates were put into the dispersion modeling sources.

Letter #4

Ian MacMillan, Program Supervisor, Inter-Governmental Review
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765-4182

4-1 Mitigation Measures to reduce air pollutant emissions have been revised to include tier schedule conditions. Please see Section 2 of the Final EIR. Air quality analysis was revised in consultation with the SCAQMD. Additionally, Mitigation Measure AIR-1 was defined. Under this measure, a conveyor system will be required for soil disposal at Boulevard Pit. Therefore, the majority of the emissions from the soil hauling trips assumed in the air quality analysis will not occur. A small number of soil haul truck trips may be required for the disposal of larger size material not suitable for reuse at Boulevard Pit, if any. Additionally, soils from Basins 4 and 5 will be trucked across Sheldon Street and taken to the conveyor loading point.

4-2 Air quality analysis for the project was revised in consultation with Mr. Gordon Mize, Air Quality Specialist with the SCAQMD. Results of these revisions are summarized in Appendix A to the Final EIR. The Final EIR, including response to comments received on the Draft EIR, will be submitted to all commenters, including the SCAQMD.

4-3 Mitigation measures to reduce air pollutant emissions during project construction have been revised. Please see Mitigation Measures AIR-1 through AIR-16 in Section 2 of the Final EIR. Mitigation Measures AIR-7, AIR-9, and AIR-11 through AIR-16 are specific measures to be implemented for the reduction of dust from project construction.

4-4 To estimate project emissions before mitigation, revision of air quality calculations was conducted based on recommendations from SCAQMD. Please see Appendix A and Section 2 of the Final EIR for revisions to air quality emissions tables.

Idling Emissions. To estimate project emissions before mitigation, idling emissions were calculated for haul trucks. Additionally, even with implementation of Mitigation Measure AIR-1 (soil conveyor), there may be some truck disposal of soil loads not suitable for reuse at Boulevard Pit. Also, soils from Basins 4 and 5 will be trucked across Sheldon Street and taken to the conveyor loading point. Therefore, Mitigation Measure AIR-6 has been defined to reduce air pollutants from truck idling.

Truck Speeds. To estimate project emissions before mitigation, truck travel from the site to the disposal location was considered; travel speeds for surface streets was assumed to average 30 miles per hour. On-site truck speeds would be lower. Emissions from on-site trucks were revised.

Mitigation Measure TR-1 requires the preparation of a construction traffic management plan. With use of the conveyor for the majority of soil disposal from the site, Mitigation Measure TR-1 will apply to haul trips necessary for material loads not suitable for disposal at Boulevard Pit. Mitigation Measure TR-2 requires the preparation and implementation of a site-specific construction traffic control plan for construction activities within public street right-of-way around the project site.

Unpaved Road Dust. To estimate project emissions before mitigation, fugitive dust emissions associated with travel on paved and unpaved surfaces were considered. It was assumed that trucks would travel 500 feet on unpaved surfaces at the TSG and 500 feet on unpaved surfaces at the disposal location, for a total travel distance of 1,000 feet per truck trip.

Paved Road Dust. To estimate project emissions before mitigation, dust emissions from travel on paved roads were updated using EPA factors from 2011. Mitigation Measure AIR-1 will require the use of a conveyor system for the majority of soil disposal. Mitigation Measure AIR-7 will require the use of street sweepers (if visible soil is carried onto adjacent public paved roads) and Mitigation Measure AIR-14 will limit vehicle tracking of dirt off-site.

Fugitive Dust from Construction Equipment. To estimate project emissions before mitigation, emissions of fugitive dust from material handling and bulldozing were calculated based on the equations in the SCAQMD's CEQA Air Quality Handbook. Bulldozers will be used to excavate material and load trucks. For the calculations, trucks were then assumed to travel to the disposal site, where the material would be deposited. Scrapers would not be used to load trucks. The material would be moist.

With mitigation, few trucks will be used to transport material off-site. Bulldozers will excavate material and load the conveyor. Soils from Basins 4 and 5 will be trucked across Sheldon Street and taken to the conveyor loading point. Water applied to the conveyed soil will maintain the moisture content. A spray bar will be installed at the trap loader, which will apply water as needed. Mitigation Measures AIR-7, AIR-9, and AIR-11 through AIR-16 are specific measures to be implemented for the reduction of dust from project construction.

HRA Sources. To estimate project impacts before mitigation, the Health Risk Assessment was re-calculated based on recommendations from SCAQMD. To calculate diesel particulate from individual volume sources, the EMFAC2011 emission factors for PM_{10} were used. The emission factors are provided in units of grams per vehicle mile traveled. Each volume source represents 50 meters of travel, or 0.031 miles of travel, along the roadway. Other assumptions are detailed in Appendix A of the Final EIR. Based on the HRA, impacts will be below the SCAQMD's significance threshold of 10 in a million.

October 21 2012

Letter #5

Mr. Hal Messinger
Dept of Water & Power
111 N. Hope St Room 1044
Los Angeles Ca. 90012

Re: LAUSD EIR for
Tujunga Spreading Grounds (TSG)

Sir;

5-1 My name is Mike O'Gara. I have lived on Cayuga Ave off Sheldon St for over 37 years. I am very concerned about the way you are planning to move 1.3 million cubic yards of dirt, in order, to increase the capacity of the spreading grounds.
I am very much in favor of the end results of the project and the ability of the City to retain more Storm Water to increase our drinking water supply. Your choice of transportation mode for the dirt is deeply disturbing.

5-2 One of the alternate methods you say you explored and rejected is to construct a conveyor belt from the TSG to the Boulevard Pit. This seems like an innovative and environmentally friendly way to move the dirt. It is also an eminently doable way to move dirt. Vulcan Materials has used this method for many years to move aggregate materials all over their properties in Sun Valley. This Conveyor belt system can be powered by Electricity which your power company can provide.
Before this alternate is discarded I would like to see it fully explored in front of the public. Cost should not be a major concern as the benefit of this project is something that will save untold millions over the next 50 -100 years. It can in all likelihood be financed as a long term capitol improvement, much the same as the LADWP power company is planning to finance the new infrastructure for renewable power over the next 20 years.

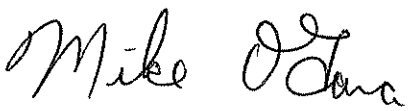
5-3 Another alternate, barely mentioned in the Summary section on page 1-16 in the first paragraph, is to mandate off road diesel powered construction equipment greater than 50 HP meet specific equipment and vehicles to be used during construction.
Such as mandating the contractor from using older equipment from the start of construction, all off-road diesel powered construction equipment greater than 50 hp meet USEPA tier 3 off-road emission standards, and post January 1, 2015 all equipment greater than 50 hp USEPA tier 4 emission standards. You have backed off this position because you state in order to ensure contractors big and small can bid. NONSENSE!!
If a company is not considered large enough to be able to do the job their bid should not be acceptable.
Your sentence "Therefore there are no feasible mitigation measures that would reduce air quality impacts to below a level of significance" is complete HOGWASH
We are discussing your moving 1.3 million cubic yards of dirt using 172, 000 diesel truck trips on a haul route that is about 800 feet from about 1350 sensitive receptors at Byrd Middle School and another 1350 minimum at Poly High School. These trucks will be passing Sun Valley High School within 100 feet of the recreational fields and the

5-3 classrooms. This facility has close to 1000 sensitive receptors attending classes and have just started a Charter School on that property which will add additional students.
How much is their health worth to the LADWP??
If you are going to use trucks to haul this dirt with, then the only acceptable trucks to use must be fueled with CNG/LNG fuel. If the company that gets the bid has to purchase new trucks, the trucks will be very close to being paid off after three steady years of construction work. There is also a very considerable savings in fuel costs of Natural Gas over diesel fuel.

5-4 In paragraph 1.9 on this same page 1-16 Your statement "Adverse environmental effects of the project related to construction –noise, traffic and air pollutant emissions—will all cease once project construction is completed and will not result in irreversible environmental changes" Followed by the statement that construction will take 2.6 years, is hard to swallow. WHAT ABOUT THE IRREVERSIBLE DAMAGE TO SOME OF THESE SENSITIVE RECEPTORS WHO WILL SUFFER FROM RESPIRATORY AILMENTS THAT YOUR PROJECT AS DESIGNED COULD CAUSE.
This is not a risk that most residents of Sun Valley wish to see under taken by LAWDP.

5-5 I wish to be informed of any and all meetings or decisions made on this LADWP EIR.
My contact information is:

Mike O'Gara
9301 Cayuga Ave
Sun Valley Ca 91352
E-mail: MIKEOGARASVANC@ aol.com
Phone: 818-767-6766



Letter #5

Mike O'Gara
9301 Cayuga Avenue
Sun Valley, CA 91352

5-1 Based on comments received on the Draft EIR, LADWP and Los Angeles County have re-evaluated the feasibility of soil transport via conveyor for the TSG project. Mitigation Measure AIR-1 has been defined and will be adopted for the proposed project. Under this Mitigation Measure, the majority of soils excavated as part of project construction will be transported off-site via an electric-powered conveyor system to Boulevard Pit near the intersection of Laurel Canyon Boulevard and Tujunga Wash Channel (please see Final EIR Section 2). Therefore, the 256 truck trips per day for disposal of approximately 1.3 million cubic yards of soil estimated in the Draft EIR will not occur. The majority of soils will be transported via conveyor; a small number of truck trips may be necessary for transport of soil loads not suitable for use at Boulevard Pit (e.g., larger size material). The specific number of these trips is not known. However, based on the existing information, most of the soil is anticipated to be acceptable to Vulcan Materials Company for re-use at Boulevard Pit, and therefore the majority of soils will be transported via conveyor. Additionally, soils from Basins 4 and 5 will be trucked across Sheldon Street and taken to the conveyor loading point.

5-2 As noted above and Final EIR Section 2, Mitigation Measure AIR-1 (Soil Conveyor System to Boulevard Pit) has been defined and will be adopted for the proposed project.

5-3 Mitigation Measures AIR-1 to AIR-16 have been revised; tier schedule conditions for heavy equipment are required by Mitigation Measures AIR-4. Since the majority of soil transport will be via conveyor, alternative fuel vehicles for minor soil hauling may be used, but will not be mandated. Please note that a Health Risk Assessment (HRA) for the construction period was conducted which included the soil hauling trips that are no longer anticipated. Even with the inclusion of the soil hauling truck trips, the health risks did not exceed SCAQMD thresholds at any residential or sensitive receptors (including schools).

5-4 LADWP acknowledges that the construction period required for this project will be lengthy. However, irreversible environmental changes to noise, traffic, and air quality related to the proposed project have not been identified.

5-5 Comment noted. You are included on the mailing list for the TSG Final EIR.

October 22, 2012

Letter #6

Mr. Hal Messinger
Dept of Water & Power
111 N. Hope St Room 1044
Los Angeles Ca. 90012

Re: LAUSD EIR for
Tujunga Spreading Grounds (TSG)

Sir;
My name is Mike O'Gara. I have lived on Cayuga Ave off Sheldon St in Sun Valley for over 37 years.
I would like to make some comments about the LADWP EIR for the Tujunga Spreading Grounds

I am very much in favor of the end results of the project and the ability of the City to retain more Storm Water to increase our drinking water supply. However your EIR falls short in many areas.

AESTHETICS

6-1 This area between Sheldon St and The Tujunga Wash and Arleta Ave and Roscoe Blvd has been an eyesore to the residents of this area for longer than I have lived here.
We do not have proper sidewalks around the Spreading Grounds. The weeds are allowed to grow all around both sides of the fence and it always looks awful. About every year some civic organization comes in and picks up the trash and takes out the weeds and LADWP contributes nothing to keeping the place clean.
I believe the Rotary organization of Sun Valley is responsible for the only attempt to landscape this area with Jacaranda trees. The LADWP has done nothing to clean up this area which is a prime example of urban blight.
There is no excuse for the LADWP to continue treating Sun Valley like a third world nation. We want proper sidewalks through out this entire area. We also want some greenery planted in what is known as the parkway where the Jacaranda trees are planted and we want the spaces filled with new trees where some of the Jacaranda trees were planted and died.

When the Spreading grounds have been dug out to the projected depth, I would ask that LADWP place 8 Foot hedges **behind** ALL the fences that enclose the perimeter of the Spreading Grounds. I would suggest Texas Privet as the proper plant for this job. Privet needs water to establish itself and after two years it is very drought resistant I grow it as a hedge at my house and it does not require watering. There are several kinds of privet and I think a good landscape architect will be able to tell you which one is best suited for this use. We will NOT accept the terrible look of the vines someone has planted on the fence at Arleta Ave. We want a solid green hedge.

6-1 Additionally, on Roscoe Blvd there is a "Berm" between the Sidewalk and the fence. It is about six foot high. This "Berm" should be planted with an attractive ground cover with whatever irrigation necessary to keep it looking well looked after.
All of the above will take a proper landscaping maintenance Program and that should be included in the Final EIR

HOURS OF OPERATION

6-2 The hours of operation you have proposed, Monday to Friday hours of 7AM to 9PM, are not acceptable.
The spreading grounds are extremely close to a lot of sensitive receptors attending school at Poly High School and Byrd Middle School. These sensitive receptors will be arriving and departing from school during your hours of operation.
The EIR, in the summary on Page 1-13 paragraph 1.6.1 refers to the "Fine Soils that reduce percolation" being removed from the location. These are the soils that are most prone to causing "fugitive dust" which would be most harmful to the "sensitive receptors" arriving and departing from School. Your start time needs to be pushed later into the morning so that you don't start work until after the children are in class.
Perhaps you can schedule a meal break during the time period that the children will be departing from the schools. Also you can and must schedule operations that are going to least affect the Air Quality at that time.(Like meal breaks)
Please remember that many of these children walk to and from school from home or from Bus stops including the ones on Laurel Canyon Blvd and San Fernando Road.

RECREATION

6-3 In the Summary section Page 1-10 it mentions a Potential beneficial impact of additional recreational amenities. Please spell out exactly what you have in mind.

TRANSPORTATION and TRAFFIC

6-4 Page1-11 Summary section under TR-1 Construction traffic Management Plan says: "This Plan **MAY** designate haul Routes…..as relevant" The word May needs to be changed to SHALL
Same section page 1-12 TR-4 under advanced notice shall include--- notification to the Sun Valley Area Neighborhood Council, The North Hollywood West Neighborhood Council,The Arleta Neighborhood Council, The Pacoima Neighborhood Council and the Foothill Trails Neighborhood Council. Stakeholders within the boundaries of all these Neighborhood Councils will be affected by this project.

SUMMARY Sect 1 PAGE 1-13 Table 1-2
RELATED PROJECTS

6-5 You have neglected to list the expansion plans of the three Waste companies in close proximity to TSG
Waste Management had their EIR finalized a few years ago. When will that project begin and what effects will that have. Athens Waste has just had their EIR approved Both of these projects are on the Suggested "Haul Route"
We also have a FEIR from Crown Disposal for a major expansion of that facility and that too may cause conflicts

6-5 You have neglected to list the on-going construction at Byrd Middle school for multiple projects. You need to co-ordinate with LAUSD regarding these projects

AIR QUALITY

6-6 I keep seeing the words Air Pollutant emissions would be temporarily significant as mitigated. YOUR TEMPORARY PERIOD IS CLOSE TO THREE YEARS. That is significantly MORE THAN TEMPORARY.

Summary page 1-16 You state that in the Summary section on page 1-16 in the first paragraph, "Another Mitigation that could reduce emmisions is to mandate off road diesel powered construction equipment greater than 50 HP meet specific equipment and vehicles to be used during construction.
Such as mandating the contractor from using older equipment from the start of construction, all off-road diesel powered construction equipment greater than 50 hp meet USEPA tier 3 off-road emission standards, and post January 1, 2015 all equipment greater than 50 hp USEPA tier 4 emission standards. You have backed off this position because you state in order to ensure contractors big and small can bid. NONSENSE!!
If a company is not considered large enough to be able to do the job their bid should not be acceptable.
Your sentence "Therefore there are no feasible mitigation measures that would reduce air quality impacts to below a level of significance" is complete HOGWASH
YOU MUST MANDATE THE CONTRACTOR TO Apply these measures on their off-road equipment.

We are discussing your moving 1.3 million cubic yards of dirt using 174,080 diesel truck trips on a haul route that is about 800 feet from about 1350 sensitive receptors at Byrd Middle School and another 1350 minimum at Poly High School. These trucks will be passing Sun Valley High School within 100 feet of the recreational fields and the classrooms. This facility has close to 1000 sensitive receptors attending classes and have just started a Charter School on that property which will add additional students.
How much is their health worth to the LADWP??
If you are going to use trucks to haul this dirt with, then the only acceptable trucks to use must be fueled with CNG/LNG fuel. If the company that gets the bid has to purchase new trucks, the trucks will be very close to being paid off after three steady years of construction work. There is also a very considerable savings in fuel costs of Natural Gas over diesel fuel.
In paragraph 1.9 on this same page 1-16 Your statement "Adverse environmental effects of the project related to construction –noise, traffic and air pollutant emissions—will all cease once project construction is completed and will not result in irreversible environmental changes" Followed by the statement that construction will take 2.6 years,

6-6 is hard to swallow. WHAT ABOUT THE IRREVERSIBLE DAMAGE TO SOME OF THESE SENSITIVE RECEPTORS WHO WILL SUFFER FROM RESPIRATORY AILMENTS THAT YOUR PROJECT AS DESIGNED COULD CAUSE.

6-7 Section 1 Summary PAGE 1-17
Paragraph 1-10 Areas of Known Controversy and issues to be resolved
THE STATEMENT:
There are no known areas of controversy related to the proposed project.
This would be laughable if I didn't think you are serious in making this statement. This entire document is full of controversial issues and concerns for the Sun Valley Neighborhood.

6-8 SECTION 4.1 Air Quality
Page 4.1-1 First paragraph
The Statement "LADWP determined that the project ***could*** have the potential to significantly impact air quality…" is horribly insincere. This project WILL DEFUINITELY IMPACT the Air Quality in Sun Valley

6-9 The fact that you do not address the measurements of PM.1 which is a known carcinogenic is disgraceful. This is the most harmful of the three measurable Harmful Particulate Matters.

6-10 Page 4.1-8 Local regulations
At the public Meeting held at LADWP facility at the steam generating plant we were told that for the beginning of this project the LADWP will hire a worker to insure that the equipment is operating in bounds of the emission regulations. This worker should be designated as the Community Liason and carry a "hotline Cell phone that will be on every hour that construction is conducted on the site. This hot-line phone number shall be posted at several sites around the construction sites and the disposal site and this employee shall be on the job for the duration of the project.

6-11 Page 4.1-10 Table 4.1-3
No mention of PM-1 A GROSS INADEQUACY

Page4.1-11 Table 4.1-4
SOUTH COAST Air Basin Attainment Classification for Criteria pollutants
6-12 PM-10 and PM-2.5 are in Nonattainment
PM-1 would also be in Nonattainment
This project violates air quality standards and seriously contributes substantially to the existing poor quality of air in Sun Valley

6-13 It will seriously expose sensitive receptors at the three schools in close proximity to the construction site and most particularly the Sun Valley High School where all these diesel trucks will pass projected presently to be EIGHTY-SEVEN THOUSAND and FORTY trips returning from the disposal site. (page 4.1-18)

6-14 The most compelling argument that the residents in Sun Valley can make against this project is the air pollutants that this project will inflict on our residents and sensitive receptors with these diesel trucks and there is a solution which is to build the conveyor belt system up the Tujunga Wash to the Boulevard pit or the Cal-mat Pit. This system shall use electricity provided by the power company

6-15 The alternate to that solution is to hire hauling companies that exclusively use LNG/CNG fueled vehicles.

Either of these alternatives would not endanger the health of our residents.

6-16 The EIR proves to be dated because of the material in its lists of Related Projects and its lack of knowledge about the construction projects scheduled in our area particularly the school construction and the scheduled construction at our three waste facilities, or are these deliberate oversights.

$.1.5 IMPACTS

6-17 4.1.5.1 Consistency with Air Quality Plan

Page 4.1-15

Statement that "AQMP assumes projects would comply with requirements for construction equipment and control of fugitive dust emissions, thereby reducing emissions of PM 2.5 and ozone precursors to the extent feasible.

By virtue of its compliance with applicable rules and regulations, the prposed project would not conflict with or obstruct implementation of The AQMP and impacts would be less than significant.

This EIR already states that the non-mobile construction equipment will produce emissions that will not be in compliance with measurements recommended for PM-10 and Pm-2.5 and they don't think that they should mandate that the contractor should be forced to supply equipment that complies. (Summary page 1-16)

6-18 You must mandate this and force the construction company to use electricity for every machine that can be powered by electricity

All forklifts should be powered by clean fuel

6-19 If it helps to reduce the amount of pollution we should cut from four simultaneous construction areas to three simultaneously construction areas.

There should be no rush to complete this project or to start it We have lived without it for many years we can live without it for the next ten years.

6-20 If by delaying the start of this project we will allow a contractor to provide us with ALL CNG/LNG fueled trucks than by all means we should wait.

Remember that the cost of 20 or 16 by your count CNG/LNG trucks will be close to paid for after almost three years of consecutive work and the savings in fuel costs'

Page 4.1-17 Table 4.1-8

States that "The maximum simultaneous emission estimates are considered truly worst case since it is unlikely that earthwork would occur in four construction zones

6-21 simultaneously with intake and conduit construction. "

I do not think it is at all unlikely. I think it is very likely that all four sites will be producing maximum emissions all the time

IN THIS TABLE IT SHOWS

NOx PM2.5 and PM10 above threshold

6-22 Page 4.1-19
First paragraph discusses health risk calculations. These diesel trucks will be traveling in close proximity with three present schools and a charter school that is coming on Telfair Ave the present site of Sun Valley High School. They will pass by approximately Four thousand sensitive receptors 5 days a week for almost three years. If even one of these students comes down with cancer or multiple sensitive receptors develop respiratory ailments it is not a less that significant impact to their families

6-23 Page 4.1.6 Cumunlative Impacts
You neglected to list Poly High School and the three waste companies with expansion permits
The emissions from the projects listed would result in CUMULATIVE CONSIDERABLE impact on ambient air quality
THIS EIR keeps saying it is temporary during construction. I don't feel that a three year construction period is temporary

Section 4.1.7 Mitigation Measures
This has a lot of objectionable words and language

6-24 AIR-1 Equipment Maintenance
The words ….."AND checked every three months" need to be added to the end of the paragraph
AIR-2 Equipment Efficiency
The words "as feasible…" need to be removed.
AIR-3 Equipment Operation
at the end of the paragraph "…..to the extent feasible" have to be removed
AIR-4 Generator Use
"To the extent possible…" Needs to be removed.
This one is most objectionable there is no reason that electric power cannot be produced by the LADWP in all places of this TSG construction sites.
AIR-5 Catalytic convertors
The words "… where feasible. " at the end of the sentence has to be removed.
ALL OF THESE WORDS AND PHRASES ARE BLANTANT ATTEMPTS TO NEGATE ALL OF THESE SO-CALLED MITIGATION MEASURES. LADWP could say it is not feasible and the community would have no protection or mitigation on any measures. Any and all of these have the possibility of bringing lawsuits.

4.1.8 Impact Significance after mitigation
6-25 Pages 4.1-21-22
Statement: "As mitigated,……but potentionally… above local significant thresholds"
We need to make sure that if additional mitigation measures to reduce particulate matter come to light (during the life of this project) that have not been identified at this time Will be implemented.
6-26 Again we come to statements where the LADWP will not mandate that the companies that bid on this project will reduce harmful air emissions by insisting that

Additional mitigations that could reduce emissions is to be used on all off road diesel powered construction equipment greater than 50 HP meet specific equipment and vehicles be used during construction.

6-26 Such as mandating the contractor from using older equipment from the start of construction, all off-road diesel powered construction equipment greater than 50 hp meet USEPA tier 3 off-road emission standards, and post January 1, 2015 all equipment greater than 50 hp USEPA tier 4 emission standards.

Contractors should bid this job using all clean fuel vehicles to haul dirt

You have backed off this position because you state in order to ensure contractors big and small can bid. NONSENSE!!

If a company is not considered large enough to be able to do the job their bid should not be acceptable.

Again with this ridiculous statement that the air will get better in three years when you finish construction BUT at what costs to our sensitive receptors during those three construction years.

NOISE

Page 2.2-2

Paragraph 4.2.2.1

6-27 TSG Project Vicinity

This is severely dated as the LAUSD has built another structure on the Byrd Middle School Campus that is not mentioned and that is the new Building that houses the Poly High School ninth grade students. These windows and doors have to be checked to see if LAUSD construction parameters took into consideration the noise that is to be generated by a project such as this. Also we need to make sure that the windows and doors on the side of the building closest to the construction site are constructed so they seal out the air from this construction.

6-28 Noise barriers shall be constructed anytime there is construction work on those basins on the west side of Sheldon Avenue.

6-29 Parents who have children attending any of the schools in close proximity shall be notified that their children will be exposed to additional noise levels and possible odor complaints as well as poor air quality during the proposed time of construction.

Paragraph 4.2.4.1 Noise impacts during construction

6-30 Page 4.2-6 Physical noise barriers must be constructed between the Spreading basins and all the residences listed in this paragraph and all the homes listed in this area identified as having a significant noise impact. Maximum effort must be made to start and finish these basins in the least amount of time possible.

6-31 Residents in the homes identified in this paragraph and an additional 200 feet shall be notified one month before The construction crew will be operating in these areas and when that construction will be completed.

6-32 Page 4.2-7

Paragraph 4.2.5 Mitigation Measures

6-32 I am having a tough time reconciling the hours of operation with the charts regarding Air Quality wherein the charts tell me the heavy equipment denigrating the air quality is working 8 hours a day and your actual stated work hours of 7:00AM to 9:00PM Monday to Friday. Which 8 hours is the equipment working and what is happening the other 6 hours when the machinery is not operating. Is it possible that the air quality charts are incorrect and don't reflect the actual hours they will be operating?
These hours of operation definitely have to be adjusted because we cannot have the construction equipment operating during the time the students will be arriving at or departing from school. The Air Pollution would be too risky. I am of the opinion that one

6-33 cannot operate nosy construction equipment before 8AM
Paragraph N-3

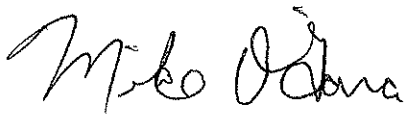
6-34 Noise control plan shall be mailed to everyone in the vicinity where we know there will heavy noise pollution
Also shall be mailed to: The Neighborhood Councils from Arleta, Pacoima, North Hollywood West, Foothill Trails and The Sun Valley Area.

6-35 I would like to see you pay attention to this letter of my concerns. I am very serious about the danger of Diesel trucks on our "Sensitive Receptors" both old and young. Sun Valley already has too many diesel trucks on our roads from Waste Companies and Gravel and mining operations and Cement companies. Some day someone is going to write the definitive book about the horrible health problems that toxic diesel fumes are causing to the health of people. It will be much that same as, and equally frightening as the book "Silent Spring" by Rachel Carson about DDT.

6-36 When this project is over LADWP shall be responsible to resurface the streets along the haul routes that have been torn up with damage from their trucks 'Also when the project

6-37 Is completed we want to see a green area where today we have weeds and desert sand. LADWP has to come forward to design a proper professional landscaping maintenance plan.

6-38 I wish to be informed of any and all meetings planned or decisions made on this LADWP EIR.
My contact information is:
Mike O'Gara
9301 Cayuga Ave
Sun Valley Ca 91352
E-mail: MIKEOGARASVANC@ aol.com
Phone: 818-767-6766



Letter #6

Mike O'Gara
9301 Cayuga Avenue
Sun Valley, CA 91352

6-1 Upgrade of the landscaping of the TSG facility is included in the proposed project. Conceptual renderings of the proposed improvements are included in Section 2 of the Final EIR. The specific facilities to be installed have not been finalized but may include trails and jogging paths, trees and other plantings, and benches. Native species with low water requirements will be used as plantings to the extent feasible. Landscape maintenance is noted in the Draft EIR (Section 3.4). As compared with the existing condition of the site, the project-related impact on aesthetics will be beneficial.

The Construction specifications will include a requirement for fabric mesh to be installed on the fences near active work areas to shield views of the construction activity.

6-2 The maximum hours for construction activity are described in the Draft EIR as 7 a.m. to 9 p.m. Actual hours (within these limits) will be determined by the Construction Contractor and are anticipated to be less than 14 hours per day, for most construction days.

6-3 Please see the conceptual renderings of the proposed recreational amenities included in Section 2 of the Final EIR. Final design of these elements (trails and jogging paths, trees and other plantings, and benches) is on-going.

6-4 With implementation of soil disposal via conveyor, off-site soil hauling will only be required for transport of soil loads not suitable for use at Boulevard Pit (e.g., larger size material). If a Construction Traffic Management Plan is necessary for these (assumed to be relatively infrequent) haul trips, the plan will contain all elements deemed necessary by LADOT. Information regarding the schedule of project construction will be made available to the neighborhood councils you have listed.

6-5 With implementation of soil disposal via conveyor, off-site soil hauling will only be required for transport of soil loads not suitable for use at Boulevard Pit. It is assumed that these truck trips will be infrequent, if necessary at all. However, response to the comment as related to project impacts before mitigation is presented below.

The traffic impact analysis for the Draft EIR included traffic associated with known related projects, based on information provided by LADOT, and an ambient growth factor of 2 percent/year (8 percent total) to account for traffic growth unrelated to the proposed project. The trip generation estimate cited in the comment cannot be verified.

The referenced waste management projects were not among the related projects identified by LADOT, which are listed in Table 5 in Appendix E to the Draft EIR. The draft EIR for the Bradley Landfill project anticipated that in 2012 the recycling center and transfer station on the site following closure of the landfill would generate approximately 2,440 daily trips, including approximately 220 in both the AM and PM peak hours. The draft EIR for the Athens Sun Valley Material Recovery Facility (north of Pendleton Street & Glenoaks Boulevard) estimated that in 2008 the project would generate approximately 376 daily trips, including approximately 110 in both the AM and PM peak hours.

The current implementation status of these projects is not known, but for the purpose of responding to this comment it is conservatively assumed that none of their traffic was included in the June 2011 baseline traffic counts used in the TSG Draft EIR. The project trip assignments from these EIRs were reviewed as they relate to analyzed locations in the DEIR for the proposed Tujunga Spreading Grounds project (Study intersections 6, 7, 8 and 12). The forecast levels of service "with project" at these intersections in the TSG Draft EIR ranges from LOS A to LOS C and the project increment is 0.012 or less. A review of the total volume of traffic added from the Bradley and Athens projects at the intersections analyzed in the TSG Draft EIR is approximately 180 or fewer trips. Not all of these trips would be "critical" movements that contribute to the calculated V/C, and if those trips were added to the TSG Draft EIR calculations, the level of service would not decline beyond LOS D. Given the magnitude of project-related trips at these locations, and the relatively good LOS forecast there, the addition of traffic related to the Bradley and Athens projects would not alter the conclusions of the TSG Draft EIR regarding the significance of temporary traffic impacts or required mitigation measures.

Draft EIR Section 3.5, Table 3-2, notes a proposed school on Arleta Avenue as a related project. The JHF Polytechnic High School Freshman Center is now open and lies adjacent to the Richard E. Byrd Middle School. LAUSD will be notified of the construction schedule of the proposed project.

6-6 Mitigation Measure AIR-4 has been added requiring tier standards be met for construction equipment.

With implementation of soil disposal via conveyor, off-site soil hauling on routes adjacent to schools will be mostly eliminated. Infrequent off-site hauling may be required for soil loads not acceptable at Boulevard Pit. Please see revisions and additions to the Mitigation Measures to reduce air pollutant emissions (AIR-1 through AIR-16).

LADWP acknowledges that the construction period required for this project will be lengthy. However, irreversible environmental changes to noise, traffic, and air quality related to the proposed project have not been identified.

6-7 Please see Section 2.5 of the Final EIR and acknowledgement of soil hauling methods as an area of known controversy.

6-8 Air pollutant emissions from project construction activity are estimates only; these estimates are then compared to SCAQMD thresholds of significance. It is acknowledged that the project will impact air quality in Sun Valley for the duration of the construction period.

6-9 Air quality standards have not been established for PM_1, therefore calculation of the estimated levels of this particulate matter fraction from project construction was not conducted.

6-10 Contact information for the Construction Manager will be posted on-site at the TSG during construction activity.

6-11 Please see response to comment 6-9.

6-12 Emission of air pollutants in excess of CEQA thresholds of significance for construction is acknowledged. Please see revisions to air quality calculations and Mitigation Measures described in Section 2 of the Final EIR and Appendix A.

6-13 A Health Risk Assessment (HRA) for the construction period was conducted which included the soil hauling trips that are no longer anticipated with soil disposal via conveyor. Even with the inclusion of the soil hauling truck trips, the health risks did not exceed SCAQMD thresholds at any residential or sensitive receptors (including schools).

6-14 A soil conveyor system will be included as part of the project (please see Mitigation Measure AIR-1, Section 2 of the Final EIR). The conveyor will be electric-powered.

6-15 A soil conveyor system will be included as part of the project (please see Mitigation Measure AIR-1, Section 2 of the Final EIR).

6-16 The list of related projects was developed based on information provided by LADOT. Draft EIR Section 3.5, Table 3-2, notes a proposed school on Arleta Avenue as a related project. The JHF Polytechnic High School Freshman Center is now open and lies adjacent to the Richard E. Byrd Middle School. Please see the responses to oral comments from the public meeting regarding the referenced waste management projects.

6-17 Please see revised Mitigation Measures AIR-1 through AIR-16 (Section 2 of the Final EIR). Mitigation Measures AIR-7, AIR-9, and AIR-11 through AIR-16 are specific measures to be implemented for the reduction of dust from project construction.

6-18 Mitigation Measure AIR-8 requires electric to be used during construction as feasible. The conveyor for soil disposal to Boulevard Pit will be electric-powered.

6-19 The number of active construction areas and the specific equipment to be used for various construction activities will be determined by the Construction Contractor. Four active work areas were assumed for the purposes of predicting impacts on air quality. This is considered a worst-case assumption based on other similar construction projects (e.g., Hansen Spreading Grounds Basin Improvements Project). Delaying the schedule of construction by restricting contractor work areas would not reduce the overall poundage of pollutants emitted. Additionally, not all work necessary for the project will generate substantial dust emissions (e.g., concrete work for intakes and conduits).

6-20 Since the majority of soil transport will be via conveyor, alternative fuel vehicles for minor soil hauling may be used, but will not be mandated.

6-21 Please see response to comment 6-19.

6-22 Please see response to comment 6-13.

6-23 Please see response to comment 6-16 and responses to oral comments received at the public meeting. LADWP acknowledges that the construction period required for this project will be lengthy.

6-24 Please see revised Mitigation Measures AIR-1 through AIR-16 (Section 2 of the Final EIR). Mitigation Measures AIR-6, AIR-8, and AIR-10 are qualified as “to the extent possible” and “as/where feasible”. This is in recognition of constraints to implementation in some cases. With soil disposal via conveyor, haul trucks will be minimal. Soils from Basins 4 and 5 will be trucked across Sheldon Street and taken to the conveyor loading point. Temporary power generation is not anticipated to be necessary, but may be

required for sites too distant from available power. Catalytic converters are anticipated to be installed on heavy construction equipment used at the site. However, it is possible that some equipment may not be able to be equipped. Please note that the Construction Manager will have the responsibility to enforce compliance with the Mitigation Measures implemented by the Construction Contractor.

6-25 Mitigation Measures AIR-7, AIR-9, and AIR-11 through AIR-16 are specific measures to be implemented for the reduction of dust from project construction. The Construction Contractor may also implement additional dust mitigation measures as necessary to ensure compliance with SCAQMD Rule 403.

6-26 Mitigation Measures to reduce air pollutant emissions have been revised to include soil disposal via conveyor, tier schedule conditions and other measures. Please see Section 2 of the Final EIR.

6-27 The Draft EIR notes the location of both the Byrd Middle School and Poly High School (DEIR Section 2.3.1). The proximity of the school buildings was considered for impact assessment. Please see response to comment 6-13.

6-28 Per Mitigation Measure N-3, a Noise Control Plan will be prepared to identify the areas of the construction site where noise control is required to meet noise ordinance standards. Physical noise barriers are one method of noise control that may be implemented, in addition to other measures.

6-29 LAUSD will be notified of the construction schedule of the proposed project. Relay of information concerning the project to parents of children attending school in the area would be at the discretion of LAUSD. With implementation of the conveyor system for soil disposal, substantial odor generation from the construction activities is not anticipated.

6-30 Per Mitigation Measure N-3, a Noise Control Plan will be prepared to identify the areas of the construction site where noise control is required to meet noise ordinance standards. Physical noise barriers are one method of noise control that may be implemented, in addition to other measures. The Construction Contractor will determine the phasing of construction activities at the site. For work in close proximity to residents, the noise generated by specific pieces of equipment and the efficacy of the noise reduction methods will be considered as part of the Noise Control Plan.

6-31 Prior to construction of the project, homes adjacent to the TSG and the relevant neighborhood councils will be notified of the anticipated construction schedule.

6-32 The maximum hours for construction activity are described in the Draft EIR as 7 a.m. to 9 p.m. Actual hours (within these limits) will be determined by the Construction Contractor and are anticipated to be less than 14 hours per day, for most construction days. For individual pieces of construction equipment, continual operation is not predicted. Therefore air pollutant emissions are calculated based on previous experience with construction projects and estimated daily total hours of equipment runtime.

Regarding construction activity being concurrent with student arrival and departure from adjacent schools, please note that the schools are located east of future Basins 4 and 5, separated by SR-170, the Hollywood Freeway. The Sheldon Arleta Landfill property separates future Basins 7 and 8 from the schools. Please see response to comment 6-13 regarding assessment of health risks from project-related air pollutant emissions.

6-33 The maximum hours for construction are based on the City of Los Angeles Noise Ordinance (LAMC Section 41.40). Actual hours of operation, within these limits, will be determined by the Construction Contractor and are anticipated to be less than 14 hours per day.

6-34 Information regarding the schedule of project construction will be made available to the neighborhood councils you have listed. Contact information for LADWP staff responsible for the project will be available (on the construction sign at the project entrance). The contact person will be available for public questions regarding noise control measures. Once the Noise Control Plan has been prepared, a community meeting will be held, to be coordinated through the local Council District Offices.

6-35 As noted above and Final EIR Section 2, Mitigation Measure AIR-1 (Soil Conveyor System to Boulevard Pit) has been defined and will be adopted for the proposed project.

6-36 Perimeter streets and streets through the project site will be inspected prior to project construction. However, since the majority of soil disposal will be via conveyor, significant deterioration of area roadways is not anticipated.

6-37 Please see response to comment 6-1.

6-38 Comment noted. You are included on the mailing list for the TSG Final EIR.

October 22, 2012

Letter #7

Mr. Hal Messinger
Dept of Water & Power
1111 N. Hope St Room 1044
Los Angeles Ca. 90012

Re: LAUSD EIR for
Tujunga Spreading Grounds (TSG)

Sir;
My name is Gary Aggas. I have lived at 11211 Cohasset St. Sun Valley for over 60 years.
I would like to make some comments about the LADWP EIR for the Tujunga Spreading Grounds

I am very much in favor of the end results of the project and the ability of the City to retain more Storm Water to increase our drinking water supply. However your EIR falls short in many areas.

AESTHETICS
This area between Sheldon St and The Tujunga Wash and Arleta Ave and Roscoe Blvd has been an eyesore to the residents of this area.
We do not have proper sidewalks around the Spreading Grounds. The weeds are allowed to grow all around both sides of the fence and it always looks awful.
There is no excuse for the LADWP to continue treating Sun Valley like a third world nation. We want proper sidewalks through out this entire area. We also want some greenery planted in what is known as the parkway where the Jacaranda trees are planted and we want the spaces filled with new trees where some of the Jacaranda trees were planted and died.

7-1

When the Spreading grounds have been dug out to the projected depth, I would ask that LADWP place 8 Foot hedges **behind** ALL the fences that enclose the perimeter of the Spreading Grounds. I would suggest Texas Privet as the proper plant for this job. Privet needs water to establish itself and after two years it is very drought resistant I grow it as a hedge at my house and it does not require watering. There are several kinds of privet and I think a good landscape architect will be able to tell you which one is best suited for this use. We will NOT accept the terrible look of the vines someone has planted on the fence at Arleta Ave. We want a solid green hedge.
Additionally, on Roscoe Blvd there is a "Berm" between the Sidewalk and the fence. It is about six foot high. This "Berm" should be planted with an attractive ground cover with whatever irrigation necessary to keep it looking well looked after.
All of the above will take a proper landscaping maintenance Program and that should be included in the Final EIR

HOURS OF OPERATION

7-2 The hours of operation you have proposed, Monday to Friday hours of 7AM to 9PM, are not acceptable.
The spreading grounds are extremely close to a lot of sensitive receptors attending school at Poly High School and Byrd Middle School. These sensitive receptors will be arriving and departing from school during your hours of operation.
The EIR, in the summary on Page 1-13 paragraph 1.6.1 refers to the "Fine Soils that reduce percolation" being removed from the location. These are the soils that are most prone to causing "fugitive dust" which would be most harmful to the "sensitive receptors" arriving and departing from School. Your start time needs to be pushed later into the morning so that you don't start work until after the children are in class.
Perhaps you can schedule a meal break during the time period that the children will be departing from the schools. Also you can and must schedule operations that are going to least affect the Air Quality at that time.(Like meal breaks)
Please remember that many of these children walk to and from school from home or from Bus stops including the ones on Laurel Canyon Blvd and San Fernando Road.

RECREATION

7-3 In the Summary section Page 1-10 it mentions a Potential beneficial impact of additional recreational amenities. Please spell out exactly what you have in mind.

TRANSPORTATION and TRAFFIC

Page1-11 Summary section under TR-1 Construction traffic Management Plan says:
7-4 "This Plan **MAY** designate haul Routes…..as relevant" The word May needs to be changed to SHALL
Same section page 1-12 TR-4 under advanced notice shall include--- notification to the Sun Valley Area Neighborhood Council, The North Hollywood West Neighborhood Council,The Arleta Neighborhood Council, The Pacoima Neighborhood Council and the Foothill Trails Neighborhood Council. Stakeholders within the boundaries of all these Neighborhood Councils will be affected by this project.

SUMMARY Sect 1 PAGE 1-13 Table 1-2
RELATED PROJECTS
You have neglected to list the expansion plans of the three Waste companies in close proximity to TSG
7-5 Waste Management had their EIR finalized a few years ago. When will that project begin and what effects will that have. Athens Waste has just had their EIR approved Both of these projects are on the Suggested "Haul Route"
We also have a FEIR from Crown Disposal for a major expansion of that facility and that too may cause conflicts

You have neglected to list the on-going construction at Byrd Middle school for multiple projects. You need to co-ordinate with LAUSD regarding these projects

AIR QUALITY

7-6

I keep seeing the words Air Pollutant emissions would be temporarily significant as mitigated. YOUR TEMPORARY PERIOD IS CLOSE TO THREE YEARS. That is significantly MORE THAN TEMPORARY.

Summary page 1-16 You state that in the Summary section on page 1-16 in the first paragraph, "Another Mitigation that could reduce emmisions is to mandate off road diesel powered construction equipment greater than 50 HP meet specific equipment and vehicles to be used during construction.

Such as mandating the contractor from using older equipment from the start of construction, all off-road diesel powered construction equipment greater than 50 hp meet USEPA tier 3 off-road emission standards, and post January 1, 2015 all equipment greater than 50 hp USEPA tier 4 emission standards.

YOU MUST MANDATE THE CONTRACTOR TO Apply these measures on their off-road equipment.

We are discussing your moving 1.3 million cubic yards of dirt using 174,080 diesel truck trips on a haul route that is about 800 feet from about 1350 sensitive receptors at Byrd Middle School and another 1350 minimum at Poly High School. These trucks will be passing Sun Valley High School within 100 feet of the recreational fields and the classrooms. This facility has close to 1000 sensitive receptors attending classes and have just started a Charter School on that property which will add additional students.

How much is their health worth to the LADWP??

If you are going to use trucks to haul this dirt with, then the only acceptable trucks to use must be fueled with CNG/LNG fuel. If the company that gets the bid has to purchase new trucks, the trucks will be very close to being paid off after three steady years of construction work. There is also a very considerable savings in fuel costs of Natural Gas over diesel fuel.

In paragraph 1.9 on this same page 1-16 Your statement "Adverse environmental effects of the project related to construction –noise, traffic and air pollutant emissions—will all cease once project construction is completed and will not result in irreversible environmental changes" Followed by the statement that construction will take 2.6 years, is hard to swallow. What about the irreversible damage to some of these sensitive receptors who will suffer from respiratory ailments that your project as designed could cause?

7-7

Section 1 Summary PAGE 1-17

Paragraph 1-10 Areas of Known Controversy and issues to be resolved

THE STATEMENT:

There are no known areas of controversy related to the proposed project.

7-7 This would be laughable if I didn't think you are serious in making this statement. This entire document is full of controversial issues and concerns for the Sun Valley Neighborhood.

7-8 SECTION 4.1 Air Quality
Page 4.1-1 First paragraph
The Statement "LADWP determined that the project ***could*** have the potential to significantly impact air quality…" is horribly insincere. This project WILL DEFUINITELY IMPACT the Air Quality in Sun Valley

7-9 The fact that you do not address the measurements of PM.1 which is a known carcinogenic is disgraceful. This is the most harmful of the three measurable Harmful Particulate Matters.

Page 4.1-8 Local regulations
7-10 At the public Meeting held at LADWP facility at the steam generating plant we were told that for the beginning of this project the LADWP will hire a worker to insure that the equipment is operating in bounds of the emission regulations. This worker should be designated as the Community Liason and carry a "hotline Cell phone that will be on every hour that construction is conducted on the site. This hot-line phone number shall be posted at several sites around the construction sites and the disposal site and this employee shall be on the job for the duration of the project.

7-11 Page 4.1-10 Table 4.1-3
No mention of PM-1 A GROSS INADEQUACY

Page4.1-11 Table 4.1-4
SOUTH COAST Air Basin Attainment Classification for Criteria pollutants
7-12 PM-10 and PM-2.5 are in Nonattainment
PM-1 would also be in Nonattainment
This project violates air quality standards and seriously contributes substantially to the existing poor quality of air in Sun Valley
7-13 It will seriously expose sensitive receptors at the three schools in close proximity to the construction site and most particularly the Sun Valley High School where all these diesel trucks will pass projected presently to be EIGHTY-SEVEN THOUSAND and FORTY trips returning from the disposal site. (page 4.1-18)
7-14 The most compelling argument that the residents in Sun Valley can make against this project is the air pollutants that this project will inflict on our residents and sensitive receptors with these diesel trucks and there is a solution which is to build the conveyor belt system up the Tujunga Wash to the Boulevard pit or the Cal-mat Pit. This system shall use electricity provided by the power company
7-15 The alternate to that solution is to hire hauling companies that exclusively use LNG/CNG fueled vehicles.
7-16 Either of these alternatives would not endanger the health of our residents.
The EIR proves to be dated because of the material in its lists of Related Projects and its lack of knowledge about the construction projects scheduled in our area particularly the

7-16 school construction and the scheduled construction at our three waste facilities, or are these deliberate oversights.

$.1.5 IMPACTS
4.1.5.1 Consistency with Air Quality Plan
Page 4.1-15

7-17 ***Statement that "AQMP assumes projects would comply with requirements for construction equipment and control of fugitive dust emissions, thereby reducing emissions of PM 2.5 and ozone precursors to the extent feasible.***
By virtue of its compliance with applicable rules and regulations, the prposed project would not conflict with or obstruct implementation of The AQMP and impacts would be less than significant.

This EIR already states that the non-mobile construction equipment will produce emissions that will not be in compliance with measurements recommended for PM-10 and Pm-2.5 and they don't think that they should mandate that the contractor should be forced to supply equipment that complies. (Summary page 1-16)

7-18 You must mandate this and force the construction company to use electricity for every machine that can be powered by electricity
All forklifts should be powered by clean fuel

7-19 If it helps to reduce the amount of pollution we should cut from four simultaneous construction areas to three simultaneously construction areas.

7-20 There should be no rush to complete this project or to start it We have lived without it for many years we can live without it for the next ten years.
If by delaying the start of this project we will allow a contractor to provide us with ALL CNG/LNG fueled trucks than by all means we should wait.
Remember that the cost of 20 or 16 by your count CNG/LNG trucks will be close to paid for after almost three years of consecutive work and the savings in fuel costs'

Page 4.1-17 Table 4.1-8

7-21 States that "The maximum simultaneous emission estimates are considered truly worst case since it is unlikely that earthwork would occur in four construction zones simultaneously with intake and conduit construction. "
I do not think it is at all unlikely. I think it is very likely that all four sites will be producing maximum emissions all the time
IN THIS TABLE IT SHOWS
NOx PM2.5 and PM10 above threshold

Page 4.1-19

7-22 First paragraph discusses health risk calculations. These diesel trucks will be traveling in close proximity with three present schools and a charter school that is coming on Telfair Ave the present site of Sun Valley High School. They will pass by approximately Four thousand sensitive receptors 5 days a week for almost three years. If even one of these students comes down with cancer or multiple sensitive receptors develop respiratory ailments it is not a less that significant impact to their families

7-23 Page 4.1.6 Cumunlative Impacts

7-23 You neglected to list Poly High School and the three waste companies with expansion permits
The emissions from the projects listed would result in CUMULATIVE CONSIDERABLE impact on ambient air quality

7-24 AIR-1 Equipment Maintenance
The words …..”AND checked every three months” need to be added to the end of the paragraph
AIR-2 Equipment Efficiency
The words “as feasible…” need to be removed.
AIR-3 Equipment Operation
at the end of the paragraph “…..to the extent feasible” have to be removed
AIR-4 Generator Use
“To the extent possible…” Needs to be removed.
This one is most objectionable there is no reason that electric power cannot be produced by the LADWP in all places of this TSG construction sites.
AIR-5 Catalytic convertors

7-25 4.1.8 Impact Significance after mitigation
Pages 4.1-21-22
Statement: “As mitigated,……but potentionally… above local significant thresholds”
We need to make sure that if additional mitigation measures to reduce particulate matter come to light (during the life of this project) that have not been identified at this time Will be implemented.

7-26 Again we come to statements where the LADWP will not mandate that the companies that bid on this project will reduce harmful air emissions by insisting that
Additional mitigations that could reduce emissions is to be used on all off road diesel powered construction equipment greater than 50 HP meet specific equipment and vehicles be used during construction.
Such as mandating the contractor from using older equipment from the start of construction, all off-road diesel powered construction equipment greater than 50 hp meet USEPA tier 3 off-road emission standards, and post January 1, 2015 all equipment greater than 50 hp USEPA tier 4 emission standards.
Contractors should bid this job using all clean fuel vehicles to haul dirt
Again with this ridiculous statement that the air will get better in three years when you finish construction BUT at what costs to our sensitive receptors during those three construction years.

7-27 NOISE

Page 2.2-2
Paragraph 4.2.2.1
TSG Project Vicinity

7-27 This is severely dated as the LAUSD has built another structure on the Byrd Middle School Campus that is not mentioned and that is the new Building that houses the Poly High School ninth grade students. These windows and doors have to be checked to see if LAUSD construction parameters took into consideration the noise that is to be generated by a project such as this. Also we need to make sure that the windows and doors on the side of the building closest to the construction site are constructed so they seal out the air from this construction.

7-28 Noise barriers shall be constructed anytime there is construction work on those basins on the west side of Sheldon Avenue.

7-29 Parents who have children attending any of the schools in close proximity shall be notified that their children will be exposed to additional noise levels and possible odor complaints as well as poor air quality during the proposed time of construction.

7-30 Paragraph 4.2.4.1 Noise impacts during construction
Page 4.2-6 Physical noise barriers must be constructed between the Spreading basins and all the residences listed in this paragraph and all the homes listed in this area identified as having a significant noise impact. Maximum effort must be made to start and finish these basins in the least amount of time possible.

7-31 Residents in the homes identified in this paragraph and an additional 200 feet shall be notified one month before The construction crew will be operating in these areas and when that construction will be completed.

7-32 Page 4.2-7
Paragraph 4.2.5 Mitigation Measures
I am having a tough time reconciling the hours of operation with the charts regarding Air Quality wherein the charts tell me the heavy equipment denigrating the air quality is working 8 hours a day and your actual stated work hours of 7:00AM to 9:00PM Monday to Friday. Which 8 hours is the equipment working and what is happening the other 6 hours when the machinery is not operating. Is it possible that the air quality charts are incorrect and don't reflect the actual hours they will be operating?
These hours of operation definitely have to be adjusted because we cannot have the construction equipment operating during the time the students will be arriving at or departing from school. The Air Pollution would be too risky. I am of the opinion that one

7-33 cannot operate nosy construction equipment before 8AM

7-34 Paragraph N-3
Noise control plan shall be mailed to everyone in the vicinity where we know there will heavy noise pollution
Also shall be mailed to: The Neighborhood Councils from Arleta, Pacoima, North Hollywood West, Foothill Trails and The Sun Valley Area.

7-35 I would like to see you pay attention to this letter of my concerns. I am very serious about the danger of Diesel trucks on our "Sensitive Receptors" both old and young. Sun Valley already has too many diesel trucks on our roads from Waste Companies and Gravel and mining operations and Cement companies. Some day someone is going to write the definitive book about the horrible health problems that toxic diesel fumes are causing to

7-35 the health of people. It will be much that same as, and equally frightening as the book "Silent Spring" by Rachel Carson about DDT.

7-36 When this project is over LADWP shall be responsible to resurface the streets along the haul routes that have been torn up with damage from their trucks 'Also when the project

7-37 Is completed we want to see a green area where today we have weeds and desert sand. LADWP has to come forward to design a proper professional landscaping maintenance plan.

7-38 I wish to be informed of any and all meetings planned or decisions made on this LADWP EIR.
My contact information is:
Gary Aggas
E-mail: GaryAggas@SBCGlobal.net
Phone: 818-731-1945

Letter #7

Gary Aggas
11211 Cohasset Street
Sun Valley, CA 91352

7-1 Upgrade of the landscaping of the TSG facility is included in the proposed project. Conceptual renderings of the proposed improvements are included in Section 2 of the Final EIR. The specific facilities to be installed have not been finalized but may include trails and jogging paths, trees and other plantings, and benches. Native species with low water requirements will be used as plantings to the extent feasible. Landscape maintenance is noted in the Draft EIR (Section 3.4). As compared with the existing condition of the site, the project-related impact on aesthetics will be beneficial.

The Construction specifications will include a requirement for fabric mesh to be installed on the fences near active work areas to shield views of the construction activity.

7-2 The maximum hours for construction activity are described in the Draft EIR as 7 a.m. to 9 p.m. Actual hours (within these limits) will be determined by the Construction Contractor and are anticipated to be less than 14 hours per day, for most construction days.

7-3 Please see the conceptual renderings of the proposed recreational amenities included in Section 2 of the Final EIR. Final design of these elements (trails and jogging paths, trees and other plantings, and benches) is on-going.

7-4 With implementation of soil disposal via conveyor, off-site soil hauling will only be required for transport of soil loads not suitable for use at Boulevard Pit (e.g., larger size material). If a Construction Traffic Management Plan is necessary for these (assumed to be relatively infrequent) haul trips, the plan will contain all elements deemed necessary by LADOT. Information regarding the schedule of project construction will be made available to the neighborhood councils you have listed.

7-5 With implementation of soil disposal via conveyor, off-site soil hauling will only be required for transport of soil loads not suitable for use at Boulevard Pit. It is assumed that these truck trips will be infrequent, if necessary at all. However, response to the comment as related to project impacts before mitigation is presented below.

The traffic impact analysis for the Draft EIR included traffic associated with known related projects, based on information provided by LADOT, and an ambient growth factor of 2 percent/year (8 percent total) to account for traffic growth unrelated to the proposed project. The trip generation estimate cited in the comment cannot be verified.

The referenced waste management projects were not among the related projects identified by LADOT, which are listed in Table 5 in Appendix E to the Draft EIR. The draft EIR for the Bradley Landfill project anticipated that in 2012 the recycling center and transfer station on the site following closure of the landfill would generate approximately 2,440 daily trips, including approximately 220 in both the AM and PM peak hours. The draft EIR for the Athens Sun Valley Material Recovery Facility (north of Pendleton Street & Glenoaks Boulevard) estimated that in 2008 the project would generate approximately 376 daily trips, including approximately 110 in both the AM and PM peak hours.

The current implementation status of these projects is not known, but for the purpose of responding to this comment it is conservatively assumed that none of their traffic was included in the June 2011 baseline traffic counts used in the TSG Draft EIR. The project trip assignments from these EIRs were reviewed as they relate to analyzed locations in the DEIR for the proposed Tujunga Spreading Grounds project (Study intersections 6, 7, 8 and 12). The forecast levels of service "with project" at these intersections in the TSG Draft EIR ranges from LOS A to LOS C and the project increment is 0.012 or less. A review of the total volume of traffic added from the Bradley and Athens projects at the intersections analyzed in the TSG Draft EIR is approximately 180 or fewer trips. Not all of these trips would be "critical" movements that contribute to the calculated V/C, and if those trips were added to the TSG Draft EIR calculations, the level of service would not decline beyond LOS D. Given the magnitude of project-related trips at these locations, and the relatively good LOS forecast there, the addition of traffic related to the Bradley and Athens projects would not alter the conclusions of the TSG Draft EIR regarding the significance of temporary traffic impacts or required mitigation measures.

Draft EIR Section 3.5, Table 3-2, notes a proposed school on Arleta Avenue as a related project. The JHF Polytechnic High School Freshman Center is now open and lies adjacent to the Richard E. Byrd Middle School. LAUSD will be notified of the construction schedule of the proposed project.

7-6 Mitigation Measure AIR-4 has been added requiring tier standards be met for construction equipment.

With implementation of soil disposal via conveyor, off-site soil hauling on routes adjacent to schools will be mostly eliminated. Infrequent off-site hauling may be required for soil loads not acceptable at Boulevard Pit. Please see revisions and additions to the Mitigation Measures to reduce air pollutant emissions (AIR-1 through AIR-16).

LADWP acknowledges that the construction period required for this project will be lengthy. However, irreversible environmental changes to noise, traffic, and air quality related to the proposed project have not been identified.

7-7 Please see Section 2.5 of the Final EIR and acknowledgement of soil hauling methods as an area of known controversy.

7-8 Air pollutant emissions from project construction activity are estimates only; these estimates are then compared to SCAQMD thresholds of significance. It is acknowledged that the project will impact air quality in Sun Valley for the duration of the construction period.

7-9 Air quality standards have not been established for PM_1, therefore calculation of the estimated levels of this particulate matter fraction from project construction was not conducted.

7-10 Contact information for the Construction Manager will be posted on-site at the TSG during construction activity.

7-11 Please see response to comment 6-9.

7-12 Emission of air pollutants in excess of CEQA thresholds of significance for construction is acknowledged. Please see revisions to air quality calculations and Mitigation Measures described in Section 2 of the Final EIR and Appendix A.

7-13 A Health Risk Assessment (HRA) for the construction period was conducted which included the soil hauling trips that are no longer anticipated with soil disposal via conveyor. Even with the inclusion of the soil hauling truck trips, the health risks did not exceed SCAQMD thresholds at any residential or sensitive receptors (including schools).

7-14 A soil conveyor system will be included as part of the project (please see Mitigation Measure AIR-1, Section 2 of the Final EIR). The conveyor will be electric-powered.

7-15 A soil conveyor system will be included as part of the project (please see Mitigation Measure AIR-1, Section 2 of the Final EIR).

7-16 The list of related projects was developed based on information provided by LADOT. Draft EIR Section 3.5, Table 3-2, notes a proposed school on Arleta Avenue as a related project. The JHF Polytechnic High School Freshman Center is now open and lies adjacent to the Richard E. Byrd Middle School. Please see the responses to oral comments from the public meeting regarding the referenced waste management projects.

7-17 Please see revised Mitigation Measures AIR-1 through AIR-16 (Section 2 of the Final EIR). Mitigation Measures AIR-7, AIR-9, and AIR-11 through AIR-16 are specific measures to be implemented for the reduction of dust from project construction.

7-18 Mitigation Measure AIR-8 requires electric to be used during construction as feasible. The conveyor for soil disposal to Boulevard Pit will be electric-powered.

7-19 The number of active construction areas and the specific equipment to be used for various construction activities will be determined by the Construction Contractor. Four active work areas were assumed for the purposes of predicting impacts on air quality. This is considered a worst-case assumption based on other similar construction projects (e.g., Hansen Spreading Grounds Basin Improvements Project). Delaying the schedule of construction by restricting contractor work areas would not reduce the overall poundage of pollutants emitted. Additionally, not all work necessary for the project will generate substantial dust emissions (e.g., concrete work for intakes and conduits).

7-20 Since the majority of soil transport will be via conveyor, alternative fuel vehicles for minor soil hauling may be used, but will not be mandated.

7-21 Please see response to comment 6-19.

7-22 Please see response to comment 6-13.

7-23 Please see response to comment 6-16 and responses to oral comments received at the public meeting. LADWP acknowledges that the construction period required for this project will be lengthy.

7-24 Please see revised Mitigation Measures AIR-1 through AIR-16 (Section 2 of the Final EIR). Mitigation Measures AIR-6, AIR-8, and AIR-10 are qualified as “to the extent possible” and “as/where feasible”. This is in recognition of constraints to implementation in some cases. With soil disposal via conveyor, haul trucks will be minimal. Soils from Basins 4 and 5 will be trucked across Sheldon Street and taken to the conveyor loading point. Temporary power generation is not anticipated to be necessary, but may be

required for sites too distant from available power. Catalytic converters are anticipated to be installed on heavy construction equipment used at the site. However, it is possible that some equipment may not be able to be equipped. Please note that the Construction Manager will have the responsibility to enforce compliance with the Mitigation Measures implemented by the Construction Contractor.

7-25 Mitigation Measures AIR-7, AIR-9, and AIR-11 through AIR-16 are specific measures to be implemented for the reduction of dust from project construction. The Construction Contractor may also implement additional dust mitigation measures as necessary to ensure compliance with SCAQMD Rule 403.

7-26 Mitigation Measures to reduce air pollutant emissions have been revised to include soil disposal via conveyor, tier schedule conditions and other measures. Please see Section 2 of the Final EIR.

7-27 The Draft EIR notes the location of both the Byrd Middle School and Poly High School (DEIR Section 2.3.1). The proximity of the school buildings was considered for impact assessment. Please see response to comment 6-13.

7-28 Per Mitigation Measure N-3, a Noise Control Plan will be prepared to identify the areas of the construction site where noise control is required to meet noise ordinance standards. Physical noise barriers are one method of noise control that may be implemented, in addition to other measures.

7-29 LAUSD will be notified of the construction schedule of the proposed project. Relay of information concerning the project to parents of children attending school in the area would be at the discretion of LAUSD. With implementation of the conveyor system for soil disposal, substantial odor generation from the construction activities is not anticipated.

7-30 Per Mitigation Measure N-3, a Noise Control Plan will be prepared to identify the areas of the construction site where noise control is required to meet noise ordinance standards. Physical noise barriers are one method of noise control that may be implemented, in addition to other measures. The Construction Contractor will determine the phasing of construction activities at the site. For work in close proximity to residents, the noise generated by specific pieces of equipment and the efficacy of the noise reduction methods will be considered as part of the Noise Control Plan.

7-31 Prior to construction of the project, homes adjacent to the TSG and the relevant neighborhood councils will be notified of the anticipated construction schedule.

7-32 The maximum hours for construction activity are described in the Draft EIR as 7 a.m. to 9 p.m. Actual hours (within these limits) will be determined by the Construction Contractor and are anticipated to be less than 14 hours per day, for most construction days. For individual pieces of construction equipment, continual operation is not predicted. Therefore air pollutant emissions are calculated based on previous experience with construction projects and estimated daily total hours of equipment runtime.

Regarding construction activity being concurrent with student arrival and departure from adjacent schools, please note that the schools are located east of future Basins 4 and 5, separated by SR-170, the Hollywood Freeway. The Sheldon Arleta Landfill property separates future Basins 7 and 8 from the schools. Please see response to comment 6-13 regarding assessment of health risks from project-related air pollutant emissions.

7-33 The maximum hours for construction are based on the City of Los Angeles Noise Ordinance (LAMC Section 41.40). Actual hours of operation, within these limits, will be determined by the Construction Contractor and are anticipated to be less than 14 hours per day.

7-34 Information regarding the schedule of project construction will be made available to the neighborhood councils you have listed. Contact information for LADWP staff responsible for the project will be available (on the construction sign at the project entrance). The contact person will be available for public questions regarding noise control measures. Once the Noise Control Plan has been prepared, a community meeting will be held, to be coordinated through the local Council District Offices.

7-35 As noted above and Final EIR Section 2, Mitigation Measure AIR-1 (Soil Conveyor System to Boulevard Pit) has been defined and will be adopted for the proposed project.

7-36 Perimeter streets and streets through the project site will be inspected prior to project construction. However, since the majority of soil disposal will be via conveyor, significant deterioration of area roadways is not anticipated.

7-37 Please see response to comment 6-1.

7-38 Comment noted. You are included on the mailing list for the TSG Final EIR.

RICHARD C. SLADE & ASSOCIATES LLC
CONSULTING GROUNDWATER GEOLOGISTS

Letter #8

MEMORANDUM

October 23, 2012

To: Mr. Hal Messinger, LADWP
Sent via email (Hal.Messinger@ladwp.com)

Job No. 500-LAS01

Re: Brief Comments to "Tujunga Spreading Grounds Enhancement Project";
Draft DEIR; by MWH
Dated August 2012

8-1 1. Be consistent with the use of the words "San Fernando Groundwater Basin". In all cases but one, the words are capitalized. Specifically, in the final paragraph on p. 2-4, the words "groundwater basin" are not capitalized.

8-2 2. I suggest adding the general location (for example, by using a circle or an oval symbol) to show the approximate location of the Tujunga Wellfield on Figure 2-2.

8-3 3. The 1st sentence in Section 2.4.3 on p. 2-6 says "…the purpose of the…(IRWMP) is to…". Actually, since several purposes are listed; please make "purpose" plural and change the word "is" to "are".

8-4 4. In the 2nd to last sentence of Section 3.1.1 on p. 3-1, it says the "abandoned basins…will be improved to provide treatment…" Please reword this since, to a lay person, this will sound like a water treatment facility is being planned also.

8-5 5. In Section 3 – Project Description, I suggest you add 1 or 2 sentences about how the project includes field operation and maintenance (O&M) on all basins on a regular basis in the future to maintain basin efficiency.

8-6 6. In the second sentence in Section 3.4.2, I suggest adding the word "gas" between "vertical" and "extraction wells" to make it more clear that these are, indeed, gas wells (not water wells) that are being discussed.

8-7 7. The 1st main paragraph atop p. 3-10 is not accurate. The use of the words "San Fernando Valley Groundwater Basin" is incorrect in terms of the definitions of its boundaries provided in the subsequent 2 or 3 sentences. This incorrect usage seems to have resulted from mixing up the terminology of the Upper Los Angeles River Area (ULARA) Judgment of 1979 to the terminology used in DWR Bulletin 118 (2003 Update Report). Please correct.

8-8 8. Add the ULARA Final Judgment dated January 26, 1979 to Section 6-References. The exact reference is listed on the ULARA website at www.ULARAwatermaster.com .

12750 VENTURA BLVD., SUITE 202, STUDIO CITY, CALIFORNIA 91604
PHONE: (818) 506-0418 • FAX: (818) 506-1343 • NAPA VALLEY PHONE: (707) 963-3914

Letter #8

Richard C. Slade, Watermaster
12750 Ventura Boulevard, Suite 202
Studio City, CA 91604

8-1 Capitalization has been standardized. Please see Section 2 of the Final EIR.

8-2 The Tujunga Wellfield has been added to Figure 2-2. Please see Section 2 of the Final EIR.

8-3 Suggested edits have been incorporated. Please see Section 2 of the Final EIR.

8-4 Suggested edits have been incorporated. Please see Section 2 of the Final EIR.

8-5 Please see Section 3.4.1 regarding project operations and maintenance.

8-6 Suggested edits have been incorporated. Please see Section 2 of the Final EIR.

8-7 Suggested edits have been incorporated. Please see Section 2 of the Final EIR.

8-8 Suggested edits have been incorporated. Please see Section 2 of the Final EIR.

Messinger, Hal

Letter #9

From: Gerald Gubatan [gerald.gubatan@lacity.org]
Sent: Friday, October 26, 2012 2:43 PM
To: Messinger, Hal
Subject: COMMENTS ON DRAFT EIR - TUJUNGA SPREADING GROUNDS ENHANCEMENT PROJECT (SCH #2012021028)

Dear Mr. Messinger:

On behalf of the Office of Council Member Richard Alarcon, 7th Council District, I am providing the comments below on the Draft Environmental Impact Report for the Tujunga Spreading Grounds Enhancement Project (SCH #2012021028). Please include these comments in the document and provide responses accordingly.

9-1 Section 3.2.1.2 states that the conveyer option is not feasible. The address given as the destination location - 11401 Tuxford Street - is not the location of the "Boulevard Pit". The address is the location of Vulcan Material Company's process facility at Tuxford Street and San Fernando Road.

In addition, the DEIR states that the Interstate-5 cannot be crossed. Please clarify whether the Interstate-5 already has a built overpass extending over the Tujunga Wash, including wide easements on either side, and therefore, a conveyor would not need to travel inside the channel.

9-2 The Council Office recommends that LADWP initiate the following actions:
1. Set-up monthly meetings with community members to provide progress reports on the project, identify and respond to any concerns.
2. Set-up a telephone "hotline" so that community members may report problems and concerns during the construction phase.

It is further recommended that LADWP take the following actions:

9-3 1. Address the hours of operation during the construction phase in order to generate minimal or reduce impacts on adjacent sensitive uses, particularly three schools. For example, LADWP could increase hours of operation during the summer season when schools are closed due to summer vacation.

9-4 2. Coordinate with the City of Los Angeles Bureau of Street Services, Public Works Department, and the Department of Transportation to monitor vehicular and truck traffic impacts, particularly impacts on city street conditions; and be required to return affected city streets to the existing conditions prior to the commencement of the Project.

9-5 3. Investigate contracting with or purchasing alternative fuel tractors in order to reduce or eliminate diesel vehicles. In the event LADWP is successful in locating alternative fuel vehicles, Council District 7 will work with the City's Bureau of Sanitation to arrange fueling for tractors at the East Valley Yard located at Pendelton Street and Glenoaks Boulevard.

Thank you for your consideration. Please contact me if you have questions or need more information.

--
Gerald G. Gubatan
Chief Planning Deputy
Office of Council Member Richard Alarcón Council District 7 City Hall, Room 470 Los Angeles, CA 90012

Tel: 213.473.7007 Fax: 213.847.0707
gerald.gubatan@lacity.org

Letter #9

Gerald Gubatan, Chief Planning Deputy
Office of Council Member Richard Alarcon
City Hall
200 Spring Street, Room 470
Los Angeles, CA 90012

9-1 Based on comments received on the Draft EIR, LADWP and Los Angeles County have re-evaluated the feasibility of soil transport via conveyor for the TSG project. Mitigation Measure AIR-1 has been defined and will be adopted for the proposed project. Under this Mitigation Measure, the majority of soils excavated as part of project construction will be transported off-site via an electric-powered conveyor system to Boulevard Pit near the intersection of Laurel Canyon Boulevard and Tujunga Wash Channel (please see Final EIR Section 2). Therefore, the 256 truck trips per day for disposal of approximately 1.3 million cubic yards of soil estimated in the Draft EIR will not occur. The majority of soils will be transported via conveyor; a small number of truck trips may be necessary for transport of soil loads not suitable for use at Boulevard Pit (e.g., larger size material). The specific number of these trips is not known. However, based on the existing information, most of the soil is anticipated to be acceptable to Vulcan Materials Company for re-use at Boulevard Pit, and therefore the majority of soils will be transported via conveyor. Additionally, soils from Basins 4 and 5 will be trucked across Sheldon Street and taken to the conveyor loading point.

9-2 Additional coordination with Neighborhood Councils will be conducted including notification of the construction schedule. Contact information for the Construction Manager will be posted on-site at the TSG during construction activity.

9-3 The maximum hours for construction activity are described in the Draft EIR as 7 a.m. to 9 p.m. Actual hours (within these limits) will be determined by the Construction Contractor and are anticipated to be less than 14 hours per day, for most construction days. Based on the overall length of the construction period, restriction of construction activity during the summer would substantially delay construction and is not proposed. Please note that the schools adjacent to the site are separated from the TSG facility by SR-170, the Hollywood Freeway (Basins 4 and 5) and by the closed Sheldon-Arleta Landfill (now Cesar Chavez Recreation Complex Project) (Basins 7 and 8). Additionally, a Health Risk Assessment (HRA) for the construction period was conducted which included the soil hauling trips that are no longer anticipated. Even with the inclusion of

the soil hauling truck trips, the health risks did not exceed SCAQMD thresholds at any residential or sensitive receptors (including schools).

9-4 Perimeter streets and streets through the project site will be inspected prior to project construction. However, since the majority of soil disposal will be via conveyor, significant deterioration of area roadways is not anticipated.

9-5 Since the majority of soil transport will be via conveyor, alternative fuel vehicles for minor soil hauling may be used by the Construction Contractor, but will not be mandated. Please note that the project will not be constructed by LADWP or County staff, but by a Construction Contractor.

CITY OF LOS ANGELES
CALIFORNIA

President
Gary Aggas

Vice President
Julie Monroy-Cantor

Secretary
Karina Valles

2nd Vice President
Mike O'Gara

Treasurer
Robert Lim

SUN VALLEY AREA NEIGHBORHOOD COUNCIL
WWW.SVANC.ORG

Sun Valley Area
Neighborhood Council
9000 Sunland Blvd Suite "A"
Sun Valley CA 91352
Telephone 818-767-8262
Fax 818-767-7510

October 30, 2012

Letter #10

Mr. Hal Messinger
Los Angeles Department of Water and Power
Environmental Planning and Assessment
111 No. Hope St., Room 1044
Los Angeles, CA 90012

Dear Mr. Messinger:

As Chairperson of the Sun Valley Area Neighborhood Council (SVANC) Planning and Land Use Committee, I write to you today in hope of reconsideration from the Los Angeles Department of Water and Power as to the method in which you will be conducting the Tujunga Spreading Grounds (TSG) project.

10-1

As you well know, the time that was given to the SVANC was not transparent. There were questions as to why the Environmental Impact Report (EIR) was not posted at the Sun Valley Library and/or a Spanish version provided when 60% of our Sun Valley residents are Hispanics. I am not sure what the legal books say about this but certainly is questionable, if an oversight, or intentional.

In the short time that we were given to study this immense project in our community, we were able to call attention to over 300 residents who have signed our petition and/or letters hereby made part of. As you will see this was done in a very short period of time, we could have collected thousands of signatures from residents who see this as a negligent and a non-community conscious project. After reviewing the boundaries I feel strong in saying that residents from Arleta and Pacoima will see evidence of the environmental disruption. With enough time I can assure you there would have been thousands of signatures.

10-2

As we obtained signatures we met a gentleman by the name of Chris Jacobson who mentioned about the unprecedented cases of Valley Fever we experienced a few years back. I personally have a girlfriend, who will be willing to come forward with her horrific
10-3 pictures of what Valley Fever did to her. Do you know anything about this Mr. Messinger? because I am told that this comes from digging and exposing mold spores in the soil, but of course, with such little time we have been given to research this any further, what I have so far is limited information on the matter. We would not want to see any unusual illness in the community during the excavation period.

10-4 Mr. Mike OGara wrote to you with details as to some of the many concerns including and not limited to the PM 10 and PM 2.5 and PM 1 levels. You are aware we have over 3000 students in the eye of your digging storm. I am in agreement with Mr. OGara's statement and support his letter.

10-5 With 171,000 trips I ask that you reconsider your method of executing this project. The conveyor belt being the safest as far as health. The CNG/LNG Trucks option would be a
10-6 historical one, for LADWP could almost be seen as a hero in this fast moving Greenpeace world.

We will oppose this project the way it has been presented. Please reconsider, 1000 signatures could become 10,000, that is how serious this community is against this project. As Planning and Land Use Committee Chairperson I have heard the community speak loud and clear and I am bringing to you their message of anger and frustration to
10-7 see no concern, consideration and/or empathy from LADWP for those who live within the most dangerously exposed neighborhoods to this project.

For the record please be advised that the SVANC is very much in support of this project. It will be of great benefit to the City of Los Angeles, however, THE BENEFIT SHOULD NOT COME AT THE EXPENSE OF THE HEALTH OF SUN VALLEY RESIDENTS.

Respectfully yours,

Monica Vacas - Chairperson
SVANC-Planning and Land Use Committee
9000 Sunland Blvd., Suite "A"
Sun Valley, CA 91352
(818) 771-1352
(818) 771-1359 Fax
monica.vacas@svanc.org

Letter #10

Monica Vacas, Chairperson
SVANC-Planning and Land Use Committee
900 Sunland Boulevard, Suite "A"
Sun Valley, CA 91352

10-1 The standard review period under CEQA for Draft EIRs is 45 days. The review period for the TSG Draft EIR was 75 days. The Draft EIR was submitted to three libraries in the project area (Panorama City, Valley Plaza, and Pacoima) on August 16, 2012. Three copies of the Draft EIR were submitted to the Sun Valley Library on September 13, 2012.

Translation of environmental documents to languages other than English is not routinely performed without prior request. However, based on community request at the public meeting for the project, the Executive Summary was translated to Spanish and posted to the LADWP website.

10-2 Comment noted. A Petition to Oppose Diesel Emissions Process of the LADWP Tujunga Spreading Grounds Enhancement Project has been received and will be forwarded to the Board of Water and Power Commissioners for their consideration. Based on comments received on the Draft EIR including the petition, Mitigation Measure AIR-1 (soil conveyor system) has been added to the proposed project.

10-3 According to the County of Los Angeles Public Health, Coccidioidomycosis, or Valley Fever, is a common fungal disease transmitted through the inhalation of *Coccidioides immitis* spores that are carried in dust. Environmental conditions conducive to an increased occurrence of coccidioidomycosis are: arid to semi-arid regions, dust storms, lower altitude, hotter summers, warmer winters, and sandy, alkaline soils. It is endemic in the southwestern US and parts of Mexico and South America. Southern California is a known endemic area (LA County Public Health, Available: http://publichealth.lacounty.gov/acd/Diseases/Cocci.htm).

To minimize construction dust emissions, and any resultant transport of fungal spores, Mitigation Measures AIR-7, AIR-9 and AIR-11 through AIR-16 will be implemented. These measures include routine use of water trucks, street sweepers and other dust control methods during construction activity. Additionally, the project is required to meet the requirements of SCAQMD Rule 403 (Fugitive Dust) (Draft EIR Section 4.1.5.2). Please note that soil to be excavated from the spreading basins is anticipated to have

higher moisture content than soils in surrounding areas since the basins are currently used for stormwater percolation.

10-4 Please see responses to comments to Letters 5 and 6 from Mr. O'Gara.

10-5 Based on comments received on the Draft EIR, LADWP and Los Angeles County have re-evaluated the feasibility of soil transport via conveyor for the TSG project. Mitigation Measure AIR-1 has been defined and will be adopted for the proposed project. Under this Mitigation Measure, the majority of soils excavated as part of project construction will be transported off-site via an electric-powered conveyor system to Boulevard Pit near the intersection of Laurel Canyon Boulevard and Tujunga Wash Channel (please see Final EIR Section 2). Therefore, the 256 truck trips per day for disposal of approximately 1.3 million cubic yards of soil estimated in the Draft EIR will not occur. The majority of soils will be transported via conveyor; a small number of truck trips may be necessary for transport of soil loads not suitable for use at Boulevard Pit (e.g., larger size material). The specific number of these trips is not known. However, based on the existing information, most of the soil is anticipated to be acceptable to Vulcan Materials Company for re-use at Boulevard Pit, and therefore the majority of soils will be transported via conveyor. Additionally, soils from Basins 4 and 5 will be trucked across Sheldon Street and taken to the conveyor loading point.

10-6 Since the majority of soil transport will be via conveyor, alternative fuel vehicles for minor soil hauling may be used, but will not be mandated.

10-7 Please see response to comment 10-2.

Messinger, Hal

From: lindahousden@yahoo.com
Sent: Wednesday, October 31, 2012 4:08 AM
To: Messinger, Hal
Cc: Gary Aggas; Mike Ogara; Monica Vacas
Subject: Re: Tujunga Spreading Grounds

Letter #11

Mr. Hall Messinger
Dept. Of Water & Power
1111 N. Hope Street
Room 1044
Los Angeles, Ca. 90012

Dear Sir,

I am writing this letter in regards to my response to having read Mr. Mike O'Gara's recent letter to you dated on October 22, 2012.

I also have lived in Sun Valley for most of my life, and my mother is probably one of the oldest homeowners and community members still alive in Sun Valley.

I am in full agreement with comments made by Mr. O'Gara in his letter of reference to the LADWP EIR for the Tujunga Spreading Grounds Project.

11-1

Indeed your EIR falls short in many areas of the detailed written out expressed areas of concerns!

I especially liked Mr. O'Gara's statements with suggestions to you regarding Hours of Operation, Recreation, Transportation & Traffic and danger of having diesel trucks being on our roads. Very impressive! Why? The truth is..."Steak holders within the boundaries of ALL the listed Neighborhood Councils will be immensely affected by this project".

It is my hope that you were not offended or surprised by the words... "You Have Neglected"- (in reference to related community projects).

Please be reminded of some of the listed purposes of the neighborhood council here below:
#1. To improve the quality of life within our community.
#2. To voice opinions and/or give input into the decision of public officials.
#3. To help make City Officials and City Departments more accountable to those within our community.
#4. To give all individuals, residents, business owners, members of organizations and other community members a forum for addressing issues regarding our community.

The health issues expressed by Mr. O'Gara in this letter make for a strong case! Air quality impacts everyone!

What about the "IRREVERSABLE DAMAGES" to our youth, as well as to others?? Carcinogens??

The anticipated respiratory ailments, (which could be caused by the project as designed), include health complications for our youth, the elderly, and especially those with immune deficiencies for example.

11-2

Valley fever in particular, (and in addition), is a known fungal infection that damages the lungs and upper respiratory tract associated with the digging up of soil on construction sites.

Although valley fever
Is primarily a lung and respiratory disease, it can sometimes spread outside the respiratory system, such as to the brain, skin, and bones.

There is data to suggest that in 60% of the cases, the disease may go symptom less. We

11-2 know too, that there is no cure and no available prophylactic vaccine.

11-3 I wish to clearly establish that I am in favor of the end results of the project, and the ability of the city to retain more storm water to increase our drinking water supply.

In addition, I wish to establish that the choice of transportation mode for the amount of dirt, "is deeply disturbing"!

11-4 A conveyor belt system does seem like a much more innovative and environmentally friendly method to move the dirt.

Please explore this method further on behalf of ALL community members affected by your project, and yes in front of the public.

The public needs to be provided this opportunity, to further voice their health concerns for themselves, loved ones, and pets.

As a Neighborhood Council board member and nurse, I advocate policies that support healthy
11-5 people, understandably building a better community.

"DIGGING PLAN DONE WRONG", could have potentially disastrous effects on our community!

The consequences have become a major concern for members of the SVANC.

Members of the Neighborhood Council make a pledge to represent our neighbors with dignity, integrity and pride.

11-6 I would like to make the request, to please be informed as well, of all meetings or decisions made on this LAPWP EIR.

Sincerely,
Linda Housden
Sun Valley Area Council Board Member

Contact information:

Linda Housden
E-mail: lindahousden@yahoo.com
Phone: 818 640-5945

Sent via BlackBerry by AT&T

Letter #11

Linda Housden
Sun Valley Area Council Board Member
lindahousden@yahoo.com

11-1 Please see responses to comments to Letters 5 and 6 from Mr. O'Gara.

Based on comments received on the Draft EIR, LADWP and Los Angeles County have re-evaluated the feasibility of soil transport via conveyor for the TSG project. Mitigation Measure AIR-1 has been defined and will be adopted for the proposed project. Under this Mitigation Measure, the majority of soils excavated as part of project construction will be transported off-site via an electric-powered conveyor system to Boulevard Pit near the intersection of Laurel Canyon Boulevard and Tujunga Wash Channel (please see Final EIR Section 2). Therefore, the 256 truck trips per day for disposal of approximately 1.3 million cubic yards of soil estimated in the Draft EIR will not occur. The majority of soils will be transported via conveyor; a small number of truck trips may be necessary for transport of soil loads not suitable for use at Boulevard Pit (e.g., larger size material). The specific number of these trips is not known. However, based on the existing information, most of the soil is anticipated to be acceptable to Vulcan Materials Company for re-use at Boulevard Pit, and therefore the majority of soils will be transported via conveyor. Additionally, soils from Basins 4 and 5 will be trucked across Sheldon Street and taken to the conveyor loading point.

11-2 A Health Risk Assessment (HRA) for the construction period was conducted which included the soil hauling trips that are no longer anticipated. Even with the inclusion of the soil hauling truck trips, the health risks did not exceed SCAQMD thresholds at any residential or sensitive receptors (including schools).

According to the County of Los Angeles Public Health, Coccidioidomycosis, or Valley Fever, is a common fungal disease transmitted through the inhalation of *Coccidioides immitis* spores that are carried in dust. Environmental conditions conducive to an increased occurrence of coccidioidomycosis are: arid to semi-arid regions, dust storms, lower altitude, hotter summers, warmer winters, and sandy, alkaline soils. It is endemic in the southwestern US and parts of Mexico and South America. Southern California is a known endemic area (LA County Public Health, Available: http://publichealth.lacounty.gov/acd/Diseases/Cocci.htm).

To minimize construction dust emissions, and any resultant transport of fungal spores, Mitigation Measures AIR-7, AIR-9 and AIR-11 through AIR-16 will be implemented. These measures include routine use of water trucks, street sweepers and other dust control methods during construction activity. Additionally, the project is required to meet the requirements of SCAQMD Rule 403 (Fugitive Dust) (Draft EIR Section 4.1.5.2). Please note that soil to be excavated from the spreading basins is anticipated to have higher moisture content than soils in surrounding areas since the basins are currently used for stormwater percolation.

11-3 Comment noted.

11-4 Mitigation Measure AIR-1, Conveyor System for Soil Disposal, has been defined and will be adopted for the proposed project. Please see Section 2 of the Final EIR.

11-5 Please see response to comment 11-2. Information regarding the schedule of project construction will be made available to relevant neighborhood councils. Contact information for LADWP staff responsible for the project will also be made available to the public (to be printed on the construction sign at the project entrance). The contact person will be available for public questions during the construction period.

11-6 Comment noted. You are included on the mailing list for the TSG Final EIR.

ARLETA NEIGHBORHOOD COUNCIL

October 31, 2012

Letter #12

Los Angeles Department of Water & Power
Environmental Services
111 North Hope Street, Room 1044
Los Angeles, CA 90012
Charles C. Holloway, Manager of Environmental Planning and Assessment
Hal Messinger, Environmental Project Manager
hal.messinger@ladwp.com
Art Castro, Project Engineer

Written Comments from the Arleta Neighborhood Council (ANC) regarding the adequacy of the Draft Environmental Impact Report (DEIR) of the proposed Tujunga Spreading Grounds Enhancement (TSG) Project follow.

To mitigate ever increasing number and severity of Extreme Weather rainstorms, drought, and increasing likelihood of Ark-like storm events that can dump the equivalent of a yearly flow of the Mississippi River from the Jet Stream over a few days in Southern California, a greater area than the TSG boundaries must be addressed as Project Areas. The Tujunga Watershed Management Plan (TWP) is calling for 123 projects to increase the ground water recharge capacity directed into aquifers and DWP is now testing several wells in Arleta for levels of toxicity and contamination from decades of manufacturing and industrial heavy metal carcinogenic and chemical pollution and to map the underground plumes to clean it up so that ground water recharge capacity can be safely increased. These projects serve as the real raison d'etre of the DWP TSG project. The Tujunga Watershed Management Plan calls for 6000 acre-feet of water conservation and diversion upstream from the TSG. That project and another 12 smaller projects total to the same 8000 acre-feet water diversion and conservation that the TSG project, in an inefficient, centralized, downstream proposal, has as it's objective.

12-1

The TSG DEIR does not consider the occurrence of an Ark storm.

The TSG project must be rescoped to provide the most economic and most environmentally sensible expenditure of rate-payer provided funding in this time of projected increases passed to the ratepayer of over 400% in twenty years and rumors that the near Bankrupt City of Los Angeles may sell off DWP in pieces or in it's entirety. The TSG must be re-scoped as at least twelve projects encompassing the 123 projects specified in the TWP. The projected 400% rate increase by the DWP would not be necessary if the TSG project was redirected toward upstream wash revitalization and rewilding.

12-2

Recommendation: The 123 projects be distilled down to 12 projects whose jurisdictional authorities or lead agencies coordinate and share project responsibilities with DWP.

12-3

Arleta Neighborhood Council Community Improvement (CI) Committee Members urged a conveyor be employed rather than the 172,000 truck trips to move the 1.3 million cubic feet of accumulated excess soil from the TSG to the closest, preferred land fill location, the Boulevard Pit - to save our neighborhoods from the increased soot, smoke,noise, traffic congestion, delays in travel time, lost productivity, loss of income, increased vehicular danger to pedestrians and other vehicular traffic, increased respiratory health hazard and associated healthcare costs. Regardless of how small or large is the number of truck haul trips, soil conveyor belt transport is desired, and implementing the 123 projects of the Tujunga Watershed Management Plan will reduce the number of truck haul trips to practically zero, making this implementation the wisest financial, economic and ecological decision on the use of rate-payer funds.

12-4

No truck haul trips is a win-win-win-win, optimal DWP project scoping and programming. If conveyance or on-site management of soil could not be achieved, CNG or LNG was preferred over Diesel trucks.

12-5
The ANC CI Committee recommends relocating sediment with conveyor belt transport (Vulcan has already built subterranean conveyor tunnels locally at their landfills) - and selling the dredged material as soil amendment - separating out rock and gravel - selling as a resource to Land Fill companies. Noise, congestion, life safety, particulate threats are solved at a far lower cost. Is the soil destination site made impermeable? That's adverse to the goals of the Tujunga Watershed Management Plan and externalizes unacceptable costs to the rate payer.

12-6
Using 172,000 haul truck trips to relocate soil externalizes the collateral costs (excess road surface from haul trucks, respiratory health care costs, loss productivity, environmental losses) to be borne by the rate payer. The DWP would find a far less costly solution if the collateral costs were internalized and made part of the project budget.

Reliance on Detention ponds show a failure to make upstream remediation to allow groundwater absorption, increased permeable ground surfaces, bioswales, tree planting, river bank revitalization.

Citation: TSG DEIR

Existing water flow capacities are: 250 cfs maximum, 100 acre-feet storage, 140 cfs percolation.

12-7
Proposed water flow capacities: 250 cfs maximum into upper TSG new intakes, 200 cfs at Tujunga-Pacoima confluence, [hat's an 80% increase of flow capacity] - 8000 annual acre-feet of water capture and recharge...by means of removal and relocation of 1.3 cubic yards of fine soil.

Rewilding needs consideration. Active and passive recreation, native, drought-tolerant, non-turf plantings and thousands of trees (such as Wax-leaf Privit trees), educational riparian settings and seasonal streams need to be included inside and adjacent to the TSG project area along the haul routes to offset decreases in air quality from the TSG project if it relies on haul truck trips.

12-8
The additional atmospheric particulate matter from the 100,000 truck trips of the Pacoima Dam Sediment removal operation in Sylmar, ongoing, was not considered in the increased chances of respiratory disease, asthma, and added burden of increased healthcare costs. The down wind impact from the Sylmar operation includes the impacted communities from the proposed TSG project. There is AQMD reporting of the Sylmar project to verify the elevated particulate levels.

12-9
Not found in the DEIR is mention of nor addressing by, the project area being within predominantly residential communities.

12-10
Traffic is adversely impacted in all scenarios at the Sheldon/Arleta Avenue intersection in all of the alternate routes and scenarios - making the differences between them - well, window dressing and moot. Methane risks at the nearby Chavez Recreation Complex are not settled. There is an unknown cost escalation if methane leakage has to be mitigated by implementation of the proposed TSG project.

12-11
Why is a TSG project goal to insure low-flow throughout the dry season? With the dry season growing by three magnitudes out to mid-century, there will be next to no flow during the dry season. A much more certain exigent is to address Ark-like flash storms.

12-12
The TSG project is 'expected' to increase aquifer volume and raise the level of the local groundwater table. Does that expectation include Arleta? Contaminated plumes need remediation first, or the higher level of the local groundwater table will contaminate a greater amount of water in the aquifer. DWP personnel costs are the highest in the city. Seven billion dollars will be spent on water over the next twenty years. 55/111 wells will receive a 50/50 mix of (storm run-off?) to reduce water pollution to make the well water potable? The quality of potable water is at a higher risk with no remediation.

12-13
How does the projected containment of 8000 annual acre-feet of water compare with annual flood levels?

12-14
Capturing the water that would otherwise flood the community is important but the scoping of the TSG project fails to include nor implement other projects of the Tujunga Watershed Management Plan. Very likely, a TSG project with a reduced scope would be accommodated with a conveyor rather than haul trucks.

12-15

Truck hauling requires hourly watering down with an on-site dust monitor. LNG or CNG trucks rather than diesel-powered would mitigate emissions especially when idling in queues. Sweepers would have to collect dropped dirt on the streets from the haul trucks. Each truck requires canvassing. The TSG site must be maintained during construction. A 24/7 on-site 'go to' Community Contact Person is necessary. Penalties would be assessed if these mitigation measures were not met. All of these costs do not meet the mission of the Tujunga Watershed Management Plan.

A 13 million dollar expenditure for 86 diesel trucks compares to a 2 million dollar expenditure for 20 CNG or LNG trucks. For an improved quality of life, we ought not put up with truck hauls at all.

12-16

There are three new schools between Roscoe Boulevard, Sheldon and Arleta Avenues not included in the DEIR. The likelihood of increase chances of traffic and pedestrian accidents was not considered.

12-17

The Arleta Neighborhood Council will consider noticing the public of the TSG project within a 500 foot radius of the project and a 200 foot radius of proposed haul routes.

12-18

Had the Sun Valley Renaissance Concept Plan's projected 151 million dollar expenditure outlined as 'Alternative 2' been adopted, the annual water management savings in terms of ground water capture would have approached what the cost of DWP's dredging operation at the Tujunga Spreading Grounds equals - in the annual wet season storage, detention and ground water recharge (sediment percolation) - roughly over 8000 acre-feet. How does the 151 million dollar 'Alternative 2' cost compare to the TSG cost which the DEIR omits and is unknown?

12-19

Indeed, a lot more trees are needed to offset the detrimental and destructive nature of the 172,000 diesel truck trips and the unsustainable 1.3 cubic million foot dredging operation, in my and the community view - speaks to the unacceptable means, methods and practices of the proposed DWP TSG as presently outlined in the Draft EIR.

12-20

By consensus, we of the ANC CI Committee support the mission of the TSG, mission that is best described by the Tujunga Watershed Management Plan: to manage, direct, capture, detain, and recharge 8000 acre-feet of water from the Tujunga-Pacoima Washes into the aquifer. We urge that the mission be met with lowered impact development per the Sun Valley Renaissance Concept Plan's Alternative 2, Table ES-2 as it applies, Tujunga Watershed Management Plan, and California's AB 32 2020 mandate for a 1/3 renewable energy economy and lowering global greenhouse gases in 1990 levels - not realizable by the DWP TSG proposal in it's present form.

Citation: Sun Valley Renaissance Concept Plan (For the 2600-acre area of Sun Valley, California), Page 43

The Tujunga Wash and the projects for its enhancement will form the backbone of the concept plan. [Mitigation measures comprising] Initial Objectives (Sun Valley Watershed Ecosystem Restoration Public Workshop/ Scoping Meeting April 19, 2007:

1. Reduce further degradation of area ecosystems
2. Develop opportunities for ecosystem restoration
3. Improve riparian and wetlands habitat
4. Prevent further degradation and improve water quality
5. Reduce urban flood damages and property loss
6. Increase opportunities for water conservation
7. Evaluate potential recreation opportunities

The project team also recommends looking into several other possible functions:

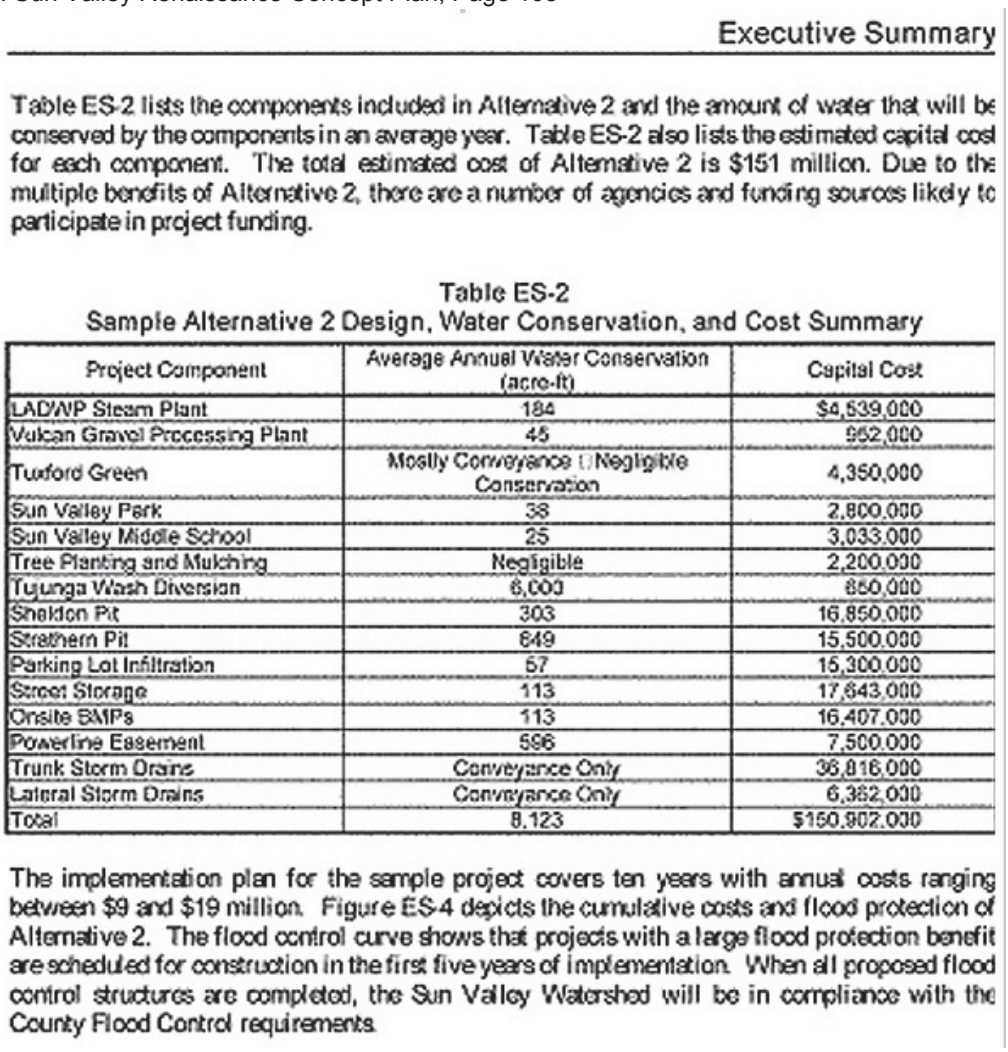
1. Replenish and recharge the water table
2. Park land development
3. Gardens and pastoral outdoor settings similar to the L.A. Arboretum
4. Recreational paseos, bikeways and paths
5. Community-friendly industries and jobs

[6. Greenbelts, Greenways and Bioswales.]

These 13 points clarifies the mission, vision, strategic plan and program of a Public Utility that addresses, mitigates, adapts to, and revitalizes habitat lost from Extreme Weather of Climate Change so as to meet and surpass California's 2020 mandate of 1/3 renewable energy and reducing global greenhouse emissions to 1990 levels. To relocalize water and power resources on the watershed and neighborhood levels. DWP needs to step up to the plate. Did the DWP

study, besides a centralized location, other mitigation measures to manage an expected annual 8000 acre-feet of water? The Sun Valley Watershed Ecosystem Restoration Public Workshop/ Scoping Meeting of April 19, 2007 offered mitigation measures for application throughout the watershed that do not approach the DWP's TSG proposal adverse, externalized environmental, quality of life, healthcare and life safety costs to be borne by ratepayers.

Citation: Sun Valley Renaissance Concept Plan, Page 108



Executive Summary

Table ES-2 lists the components included in Alternative 2 and the amount of water that will be conserved by the components in an average year. Table ES-2 also lists the estimated capital cost for each component. The total estimated cost of Alternative 2 is $151 million. Due to the multiple benefits of Alternative 2, there are a number of agencies and funding sources likely to participate in project funding.

12-20

Table ES-2
Sample Alternative 2 Design, Water Conservation, and Cost Summary

Project Component	Average Annual Water Conservation (acre-ft)	Capital Cost
LADWP Steam Plant	184	$4,539,000
Vulcan Gravel Processing Plant	45	992,000
Tuxford Green	Mostly Conveyance ; Negligible Conservation	4,350,000
Sun Valley Park	38	2,800,000
Sun Valley Middle School	25	3,033,000
Tree Planting and Mulching	Negligible	2,200,000
Tujunga Wash Diversion	6,000	850,000
Sheldon Pit	303	16,850,000
Strathern Pit	649	15,500,000
Parking Lot Infiltration	57	15,300,000
Street Storage	113	17,643,000
Onsite BMPs	113	16,407,000
Powerline Easement	596	7,500,000
Trunk Storm Drains	Conveyance Only	36,816,000
Lateral Storm Drains	Conveyance Only	6,382,000
Total	8,123	$150,902,000

The implementation plan for the sample project covers ten years with annual costs ranging between $9 and $19 million. Figure ES-4 depicts the cumulative costs and flood protection of Alternative 2. The flood control curve shows that projects with a large flood protection benefit are scheduled for construction in the first five years of implementation. When all proposed flood control structures are completed, the Sun Valley Watershed will be in compliance with the County Flood Control requirements.

Was Table ES-2 considered the DWP TSG proposal to mitigate the projected annual 8000 acre-feet of water management required in the actual TSG project scoping?

Aspects of the DWP TSG proposal are actual Projects included in the Tujunga Watershed Management Plan, described in the 2007 Sun Valley Renaissance Concept Plan study, completed and published 5 years prior to the DWP TSG proposal:

> #63 Tujunga Spreading Grounds Intake and Basin Improvements
> Regrade the spreading basins; abandon existing Tujunga Wash intake and rubber dam and relocate to Basin 1; add an intake and rubber dam near Basin 12 to capture flows from Pacoima Diversion Channel; install telemetry system. The project would take advantage of the lifting of spreading restrictions made possible by the completion of the City of LA's proposed methane extraction project.

Relocating the 1.3 million cubic feet of soil to one of five proposed destinations (Was the calculation from the #63 Tujunga Spreading Grounds Intake and Basin Improvements Project?) contradicts and defeats the impact, purpose and mission of Project #74 and #82 of the Tujunga Watershed Management Plan cited in the 2007 Sun Valley Renaissance Concept Plan.

#74 Boulevard Pit
Acquire and develop the 140-acre Boulevard Pit into a multi-use retention and recharge facility to enhance stormwater conservation.

#82 Boulevard Pit Park
Develop Regional Park, detention area and swale and trail network. Create a greenway connection to Tujunga Wash.

If the projects of the Tujunga Watershed Management Plan were constructed, then would the annual 8000 acre-feet of water management and the 1.3 million cubic feet of soil be considerably reduced? Would the scoping of the TSG be a fraction of the projected 8000 annual acre-feet of water captured and recharged if the Tujunga Watershed Management Plan was implemented by a revised TSG proposal? Would DWP's TSG Project even be necessary? Would DWP's TSG Project environmental impact be made manageable and sustainable?

Prepared and Submitted by:

Jack Lindblad, Architect and Urban Planner,
Arleta Neighborhood Council Community Improvement Committee Chair

Sergio Ibarra, MPA,
Arleta Neighborhood Council President

Citation: Sun Valley Renaissance Concept Plan, Page 100

Projects included in the Tujunga Watershed Management Plan within the Boundaries of the Sun Valley Renaissance Project:

#2 Transmission Line Easement Project
Project proposes to capture and infiltrate stormwater beneath existing LADWP and Edison power line easements for groundwater recharge, TMDL compliance and flood protection. Significant opportunity for pocket parks, recreation areas and trails linking large portions of the watershed. In addition, the project will provide water quality benefits, and habitat restoration opportunities that are lacking in the region.

#8 Tujunga Wash Bridge Retrofit
Proposal to Retrofit the existing Tujunga Wash bridges to allow for pedestrian paths/Class I bikeway along the Tujunga Wash easement per the County's Los Angeles River Master Plan, and to allow for greater channel width for hydrologic/habitat improvements in future. Project will create a significant alternative transit linkage, create recreational opportunities from the Los Angeles River to Pacoima Wash, Hansen Dam to the rest of the Tujunga Watershed.

#12 Decrease Impermeability in Tujunga Watershed
Remove impervious surfaces throughout watershed where feasible. Regional benefits of flood attenuation, water quality improvements and possible habitat

#23 Tujunga Wash Greenway - Bike & Pedestrian Paths
Continuous, separate, bike and pedestrian paths along the Tujunga Wash will connect the communities along the Tujunga Wash and provide access to the Hansen Dam Recreation Area and eventually Griffith Park, Downtown LA, the West San Fernando Valley and Long Beach. The project should include appropriate native landscaping, wayfinding and educational/interpretive signage.

#34 Tujunga and Sun Valley Watershed - Tujunga Wash Diversion Project
Project will divert stormwater flows from the Tujunga Wash, downstream of Hansen Dam, to Sheldon Pit, for groundwater recharge, wetlands water quality enhancements, and multiuse recreational opportunities.

#35 Tujunga and Sun Valley Watershed - Valley Steam Plant
Capture stormwater runoff from the LADWP Steam Plant property in Sun Valley, filter flows, and pump the water to recharge the Hansen Spreading Grounds within the Tujunga Watershed.

#48 Hansen Spreading Grounds Intake and Telemetry Improvements
Replace existing steel radial gate in Tujunga Wash with a rubber dam; install telemetry for monitoring and remote operation. Project would enhance efficiency of operations and lessen the long-term maintenance of the intake works.

#49/85 Hansen Spreading Grounds Optimization
Project proposes to optimize the recharge capacity of the spreading grounds by modernizing and automating the existing intake structures and reconfiguring the spreading basins to increase retention capacity. There may be opportunities for compatible use of the spreading grounds that are lacking in the region (e.g. habitat restoration, open space, passive recreation)

#59 Recycled Water Groundwater Recharge Feasibility Study
Project will determine technical feasibility and public acceptance of using advanced treated recycled water for groundwater recharge in the east San Fernando Valley, providing significant potential water resource benefits.

#62 Sheldon Pit
Evaluate the feasibility of acquiring and developing Sheldon Gravel Pit into a multi-use retention and infiltration facility to enhance stormwater conservation, habitat restoration, and recreation. Project will seek to balance water conservation, water quality, open space, and habitat restoration in an integrated fashion; project complements other efforts in the area to better utilize our local water resources

#63 Tujunga Spreading Grounds Intake and Basin Improvements
Regrade the spreading basins; abandon existing Tujunga Wash intake and rubber dam and relocate to Basin 1; add an intake and rubber dam near Basin 12 to capture flows from Pacoima Diversion Channel; install telemetry system. The project would take advantage of the lifting of spreading restrictions made possible by the completion of the City of LA's proposed methane extraction project.

#74 Boulevard Pit
Acquire and develop the 140-acre Boulevard Pit into a multi-use retention and recharge facility to enhance stormwater conservation.

#82 Boulevard Pit Park
Develop Regional Park, detention area and swale and trail network. Create a greenway connection to Tujunga Wash.

#89 MTA Parking Lot
Proposed median plantings to provide shade and collect stormwater runoff from parking lot and clean water before it flows into the Tujunga Wash.

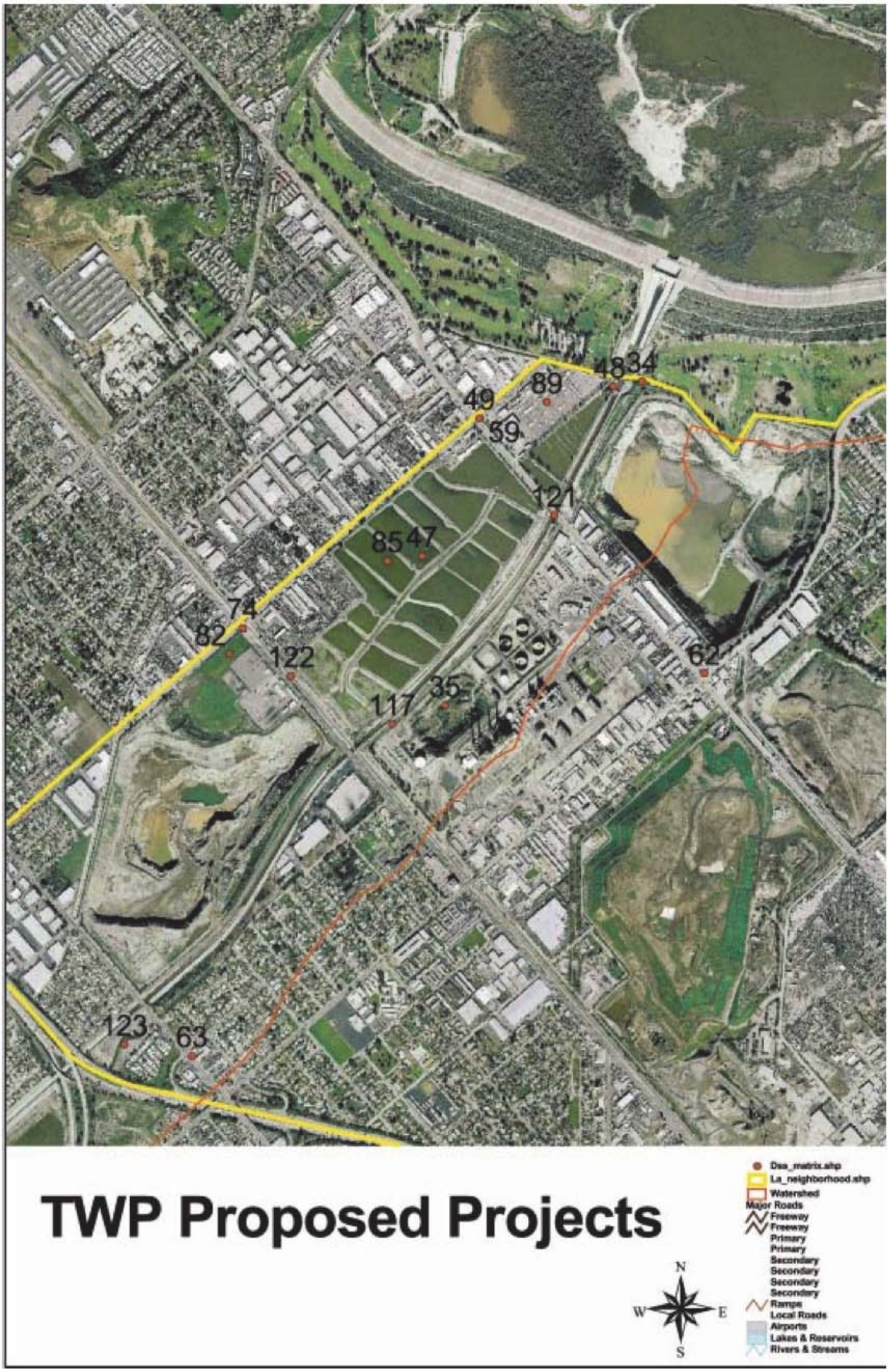
#117 Sun Valley Greenbelt
Proposed Recreation trail network to connect Hansen Golf Course, Hansen Spreading Grounds, Tujunga Wash, Branford Landfill, Boulevard Pit, Tujunga Spreading Grounds, Arleta Spreading Grounds, former Sheldon-Arleta Landfill (new Department of Parks and Recreation Cesar Chavez Park) and local schools. Hiking and Equestrian Trails to be of decomposed granite, and paved bike trails both to be landscaped with native planting and pocket parks with future access to spreading grounds and pits upon permissible access. Trails to link [to proposed bike, pedestrian and equestrian] trail networks in Arleta, Pacoima and Foothills Neighborhood Councils.

#121 Water Quality Improvement Project @ Metal Plating Yards
Develop Study to determine impacts of Industrial Facilities adjacent to Tujunga Wash/Hansen Spreading Grounds and Sheldon Gravel Pit on the Water Supply and recommend appropriate actions, [best management practices] BMPs and education program for businesses.

#122 San Fernando Road (North) Swale, Rail/Trail, and Rail ROW
Class 1 bike path along San Fernando Road. Plant trees and California Natives at edge of Hansen Spreading grounds. Possible street vacation of North San Fernando Road. Vacation would also remove current major dumping problem at entrance to Hansen Spreading Grounds and address trash TMDLs. Site to be regraded to capture and clean stormwater entering Hansen Spreading Grounds.

#123 Tujunga Spreading Ground Expansion
There exist Surplus property located between Sheldon Street and the Tujunga Wash below Laurel Canyon Blvd. that could be incorporated into the Tujunga Spreading Grounds. Project would also develop long-term floodplain buy-back scenario to protect existing open space to provide additional flood protection and passive recreation.

Citation: Sun Valley Renaissance Concept Plan, Page 102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TWP Proposed Projects
Dsa_matrix.shp
La_neighborhood.shp
Watershed
Major Roads
Freeway
Freeway
Primary
Primary
Secondary
Secondary
Secondary
Secondary
Ramps
Local Roads
Airports
Lakes & Reservoirs
Rivers & Streams
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S

Letter #12

Jack Lindblad, Architect and Urban Planner
Arleta Neighborhood Council Community Improvement Committee Chair
9300 Laurel Canyon Boulevard, Second Floor
Pacoima, California 91331

12-1 The objective of the TSG Enhancement Project is to increase stormwater recharge into the San Fernando Groundwater Basin through enhancement and operation of the TSG facility. Due to increasing need for local water supplies in the Los Angeles area and subsequent demand on groundwater supplies, enhancement of the TSG facility will enable capture of a larger volume of stormwater than is currently possible. Modeling conducted by LADWP indicates that an average of an additional 8,000 acre-feet of stormwater per year will be captured and recharged with the enhanced facility. The objective of the project is not flood control. In the event of a severe storm occurrence, the volume of water diverted to the TSG would be limited to avoid flooding of the facility.

The Tujunga/Pacoima Watershed Plan has the following over-arching goal: To revitalize the Tujunga/Pacoima Watershed, balancing water supply, water quality, community open space needs, environmental protection and restoration, and public safety (The River Project, April 2008, available: http://www.theriverproject.org/tujungawash/plan.html).

12-2 The proposed TSG project is not inconsistent with implementation of upstream wash revitalization and rewilding projects by LADWP or others. However, the proposed project is the enhancement of an existing City-owned facility with the objective of groundwater recharge. Substitution of the TSG project for upstream projects is not proposed.

12-3 Based on comments received on the Draft EIR, LADWP and Los Angeles County have re-evaluated the feasibility of soil transport via conveyor for the TSG project. Mitigation Measure AIR-1 has been defined and will be adopted for the proposed project. Under this Mitigation Measure, the majority of soils excavated as part of project construction will be transported off-site via an electric-powered conveyor system to Boulevard Pit near the intersection of Laurel Canyon Boulevard and Tujunga Wash Channel (please see Final EIR Section 2). Therefore, the 256 truck trips per day for disposal of approximately 1.3 million cubic yards of soil estimated in the Draft EIR will not occur. The majority of soils will be transported via conveyor; a small number of truck trips may be necessary for transport of soil loads not suitable for use at Boulevard Pit (e.g., larger size material). The specific number of these trips is not known. However, based on the existing information, most of the soil is anticipated to be acceptable to Vulcan Materials Company for re-use at

Boulevard Pit, and therefore the majority of soils will be transported via conveyor. Additionally, soils from Basins 4 and 5 will be trucked across Sheldon Street and taken to the conveyor loading point.

12-4 Since the majority of soil transport will be via conveyor, alternative fuel vehicles for minor soil hauling may be used, but will not be mandated.

12-5 Please see response to comment 12-3. Soils transported to Boulevard Pit are anticipated to be used for construction of a ramp at the facility. The permeability of the ramp would depend on construction technique (to be determined by Vulcan Materials Company).

12-6 Please see response to comment 12-3.

12-7 Please see response to comment 12-2. While not considered rewilding, upgrade of the landscaping of the TSG facility is included in the proposed project. Conceptual renderings of the proposed improvements are included in Section 2 of the Final EIR. The specific facilities to be installed have not been finalized but may include trails and jogging paths, trees and other plantings, and benches. Native species with low water requirements will be used as plantings to the extent feasible.

12-8 Please see revisions to the air quality analysis for the proposed project (Section 2 and Appendix A of the Final EIR). Impact assessment was done in collaboration with SCAQMD and additional Mitigation Measures were defined. Additionally, a Health Risk Assessment (HRA) for the construction period was conducted which included the soil hauling trips that are no longer anticipated. Even with the inclusion of the soil hauling truck trips, the health risks did not exceed SCAQMD thresholds at any residential or sensitive receptors (including schools).

12-9 Please see Draft EIR Sections 1.2, 2.3.1, 4.2.2.2, 4.2.4.1, and 4.3.2.1.

12-10 With soil transport via conveyor, the traffic impact at the Sheldon/Arleta intersection would not occur.

Phase I of the Cesar Chavez Recreation Complex Project (completed in 2010) upgraded the landfill's methane gas extraction system and mitigated the methane migration issue, allowing for full operation of the spreading facilities. Methane gas monitoring is described in Draft EIR Section 3.4.2. The City of Los Angeles manages the closed landfill and operates the methane gas extraction system. Additional costs for the gas extraction system, if any, would be borne by the City.

12-11 The low flow intake at the TSG is intended to maximize the utility of the facility. Controlled releases from Hansen Dam and incidental flows from landscaping will be able to be percolated at TSG. Please note that the objective of the project is groundwater recharge not flood control.

12-12 The Sheldon-Arleta Landfill encompasses about 41 acres and was operated from February 1962 to July 1974 as a Class III sanitary landfill. The landfill received approximately 3 million tons of residential and commercial refuse. Since July 1974, the City of Los Angeles Bureau of Sanitation has been performing the necessary post-closure maintenance work. The City of Los Angeles completed a Solid Waste Assessment Test (SWAT) report in 1987 for the Sheldon-Arleta Landfill and submitted the SWAT to the RWQCB. The SWAT concluded that the landfill does not contaminate the groundwater, however continued monitoring of the groundwater wells, the leachate wells and the effects of the spreading by the adjacent TSG was recommended. The current monitoring and control systems at the Sheldon-Arleta Landfill consist of a groundwater monitoring system; a stormwater drainage control system; and a gas collection, monitoring and control system.

Prior to placement of waste, the City placed an 8-foot thick layer of permeable clay on three sides of the landfill pit to 760 feet amsl. From this elevation it is lined with 6 feet of clay to 830 feet amsl, the final elevation of refuse. The sides are tied in to the bottom of the landfill which is lined with over 15 feet of clay. Based on monitoring results, the subsurface clay barrier and final cover have adequately isolated the refuse cell from significant amounts of water from both TSG and stormwater infiltration. Water is prevented from entering the refuse cell by (1) maintaining the water levels below 700 msl in both DWP wells 4897A and 4897B during TSG operation so no water can enter through the sides of the landfill and (2) maintaining the cover to facilitate run-off from the site and evapotranspiration to minimize stormwater infiltration.

Therefore, based on the existing clay barrier, management practices at the landfill and groundwater monitoring program, groundwater contamination from the closed Sheldon-Arleta Landfill from increased recharge at TSG is not anticipated.

12-13 The objective of the project is groundwater recharge not flood control.

12-14 The proposed project is not inconsistent with, but does not propose to implement, upstream projects included in the Tujunga/Pacoima Watershed Plan. Please see response to comment 12-3.

12-15 Please see response to comment 12-3 and revisions to the air quality Mitigation Measures described in Section 2 of the Final EIR. Prior to construction of the project, homes adjacent to the TSG and the relevant neighborhood councils will be notified of the anticipated construction schedule. Contact information for the Construction Manager will be posted on-site at the TSG during the construction period. The contact person will be available for public questions.

12-16 The Draft EIR notes the location of both the Byrd Middle School and Poly High School (DEIR Section 2.3.1). The proximity of the school buildings was considered for impact assessment. Draft EIR Section 3.5, Table 3-2, notes a proposed school on Arleta Avenue as a related project. The JHF Polytechnic High School Freshman Center is now open and lies adjacent to the Richard E. Byrd Middle School. LAUSD will be notified of the construction schedule of the proposed project.

With implementation of soil disposal via conveyor, substantial increases in risks to pedestrian safety are not anticipated. However, since hauling may be required for soils not suitable for reuse at Boulevard Pit, and since construction may impact the roads through the TSG facility, Mitigation Measures TR-1 and TR-2 will be implemented. Traffic control will include temporary signage where sidewalks adjacent to the TSG site will be closed.

12-17 Prior to construction of the project, homes adjacent to the TSG and the relevant neighborhood councils will be notified of the anticipated construction schedule. With implementation of soil disposal via conveyor, notice along the haul routes is not currently planned.

12-18 Since construction costs associated with the proposed project do not relate to environmental impacts, they are not described in the EIR. Information on project costs will be included in the Board of Water and Power Commissioner's approval letter, which will be available on LADWP's website (www.ladwp.com) 72 hours before the meeting where the project will be considered.

12-19 Please see responses to comments 12-3 and 12-7.

12-20 The commenter's preference for projects to recharge groundwater in the watershed at locations other than TSG is noted. However, the proposed project is enhancement of an existing city-owned facility currently used for stormwater recharge. Construction of numerous smaller projects which could cumulatively recharge an additional 8,000 acre-

feet of stormwater per year would also have environmental impacts on air quality, noise and traffic during construction. Please see response to comment 12-2.

While the proposed project is not a renewable energy project, increases in groundwater levels do serve to reduce power demand for potable water pumping.

12-21 Please see response to comment 12-2.

CITY HALL
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(818) 362-4857 Fax

RICHARD ALARCÓN
Councilmember
Seventh District

Letter #13

November 2, 2012

Mr. Ronald O. Nichols
General Manager
Los Angeles Department of Water and Power
111 North Hope Street, Room 1044
Los Angeles, CA 90012

Attention: Mr. Hal Messinger

Re: Public Comment – Draft Environmental Impact Report – Tujunga Spreading Grounds Enhancement Project (SCH #2012021028)

Dear Mr. Nichols:

Thank you for extending the public comment period to October 31, 2012, at the request of my office. I am hereby providing my comments on the Draft Environmental Impact Report for the Tujunga Spreading Grounds Enhancement Project. Although the subject site is not located in Council District 7, I represent the constituents who attend Frances Polytechnic and Sun Valley High Schools adjacent to the project site and live in surrounding residential neighborhoods which will be directly impacted by the Project. Please include these comments in the document and provide the appropriate responses in accordance with CEQA.

13-1 **Conveyor to Boulevard Pit**: Section 3.2.1.2 provides an address, 11401 Tuxford Street, as the destination location for the placement of soils. However, the address is not the location of the "Boulevard Pit" but is the location of Vulcan Material Company's processing facility at Tuxford Street and San Fernando Road. The document rejects the conveyor system option as infeasible. Please fully explain how thoroughly this option was considered, elaborate on the evidence evaluated and clearly demonstrate the conclusion reached.

13-2 **Alternative Haul Route Options**: LADWP should investigate alternative locations for the deposit of materials, including Vulcan's Boulevard Pit located directly adjacent to the Tujunga Wash at 12600 Branford Street. LADWP should also identify an

13-2 alternative haul route option which does not adversely impact schools, extending northerly on Arleta Avenue and easterly on Branford Street to the above location.

13-3 **Interstate-5 Crossing:** The DEIR states that the Interstate-5 cannot be crossed. Please clarify whether the Interstate-5 already has an overpass extending over the Tujunga Wash, including wide easements on either side, and therefore, a conveyor would not need to travel inside the channel.

Council District 7 Recommendations: The Council Office recommends that LADWP initiate the actions noted below. Please memorialize these recommended actions as environmental mitigations:

13-4 1. Set-up monthly meetings with community members and school officials to provide progress reports on the Project, identify and respond to any concerns.

13-5 2. Set-up a telephone "hotline" so that community members may report problems and concerns during the construction phase.

13-6 3. Address the hours of operation during the construction phase in order to generate minimal or reduce impacts on adjacent sensitive uses, particularly three schools. For example, LADWP could increase hours of operation during the summer season when schools are closed due to summer vacation.

13-7 4. Coordinate with the City of Los Angeles Bureau of Street Services, Public Works Department, and the Department of Transportation to monitor vehicular and truck traffic impacts, particularly impacts on city street conditions; and be required to return affected city streets to the existing conditions prior to the commencement of the Project.

13-8 5. Investigate contracting for or purchasing alternative fuel tractors in order to reduce or eliminate diesel vehicles. In the event LADWP is successful in locating alternative fuel vehicles, Council District 7 will work with the City's Bureau of Sanitation to arrange fueling for tractors at the East Valley Yard located at Pendelton Street and Glenoaks Boulevard.

Thank you for your consideration. Please contact me Gerald Gubatan of my staff at (213) 475-7007 if you have questions or need more information.

Yours truly,

RICHARD ALARCÓN
Councilmember, Seventh District

RA:ggg

cc: Gary Aggas, Sun Valley Area Neighborhood Council

Letter #13

Richard Alarcon, Councilmember, Seventh District
City Hall
200 Spring Street, Room 470
Los Angeles, California 90012

13-1 Based on comments received on the Draft EIR, LADWP and Los Angeles County have re-evaluated the feasibility of soil transport via conveyor for the TSG project. Mitigation Measure AIR-1 has been defined and will be adopted for the proposed project. Under this Mitigation Measure, the majority of soils excavated as part of project construction will be transported off-site via an electric-powered conveyor system to Boulevard Pit near the intersection of Laurel Canyon Boulevard and Tujunga Wash Channel (please see Final EIR Section 2). Therefore, the 256 truck trips per day for disposal of approximately 1.3 million cubic yards of soil estimated in the Draft EIR will not occur. The majority of soils will be transported via conveyor; a small number of truck trips may be necessary for transport of soil loads not suitable for use at Boulevard Pit (e.g., larger size material). The specific number of these trips is not known. However, based on the existing information, most of the soil is anticipated to be acceptable to Vulcan Materials Company for re-use at Boulevard Pit, and therefore the majority of soils will be transported via conveyor. Additionally, soils from Basins 4 and 5 will be trucked across Sheldon Street and taken to the conveyor loading point.

13-2 The majority of soil disposal will be via conveyor to Boulevard Pit. Soil not suitable for reuse at Boulevard Pit, if any, will be transported via truck to an alternative disposal site. The haul route for those trips, if any, will be determined based on the location of the disposal site.

13-3 The conveyor will travel under the freeways, in existing box culverts and concrete pipes. Please see Figure 2-1 in Section 2 of the Final EIR.

13-4 Additional coordination with Neighborhood Councils will be conducted including notification of the construction schedule.

13-5 Contact information for the Construction Manager will be posted on-site at the TSG during the construction period. The contact person will be available for public questions.

13-6 The maximum hours for construction activity are described in the Draft EIR as 7 a.m. to 9 p.m. Actual hours (within these limits) will be determined by the Construction Contractor and are anticipated to be less than 14 hours per day, for most construction days. Based on the overall length of the construction period, restriction of construction activity during the summer would substantially delay construction and is not proposed. Please note that the schools adjacent to the site are separated from the TSG facility by SR-170, the Hollywood Freeway (Basins 4 and 5) and by the closed Sheldon-Arleta Landfill (now Cesar Chavez Recreation Complex Project) (Basins 7 and 8). Additionally, a Health Risk Assessment (HRA) for the construction period was conducted which included the soil hauling trips that are no longer anticipated. Even with the inclusion of the soil hauling truck trips, the health risks did not exceed SCAQMD thresholds at any residential or sensitive receptors (including schools).

13-7 Perimeter streets and streets through the project site will be inspected prior to project construction. However, since the majority of soil disposal will be via conveyor, significant deterioration of area roadways is not anticipated.

13-8 Since the majority of soil transport will be via conveyor, alternative fuel vehicles for minor soil hauling may be used by the Construction Contractor, but will not be mandated. Please note that the project will not be constructed by LADWP or County staff, but by a Construction Contractor.

Letter #14

Los Angeles Department of Water & Power
Environmental Department
111 Hope St room 1044
Los Angeles Ca 90012

Mr. Messinger:

My name is MARY DEKORTE and I have lived in SUN VALLEY (Location-No Holly or Arleta or Sun Valley) for 63 years.

14-1 I am very concerned about the EIR you have circulated regarding the Tujunga Spreading Grounds. I am very much in support of the idea of increasing our ability to recover more storm water to ultimately increase our drinking water supply. I am very concerned about the cost to the health of the residents immediately adjacent to the "Haul Routes" you have

14-2 designated. You are proposing 86,000 round trips to and from the dumping grounds using Diesel Trucks. Diesel Trucks emit many types of harmful emissions, not the least of which is Particulate Matter (PM1) which is a known carcinogenic.

14-3 There are three schools in close proximity to this haul route with approximately 4000 students. In fact there is a fourth school, a charter starting on the campus of Sun Valley High School. It would be a travesty if this haul route with diesel trucks was approved. There are alternatives. Your EIR explored one which was a conveyor belt through the Tujunga Wash itself. This seems a wise use of technology.

Vulcan Materials has used for years a different Technology to move aggregate material all around Sun Valley. Your EIR has rejected this alternate solution and the Community wants this revisited. The cost in dollars has to be less than the cost of the health of the people living near the Basins and within close proximity of the Boulevard pit, as well as the sensitive receptors who are students in the schools.

14-4 There is also a huge amount of noise generated and wear and tear on the roads traveled.

14-5 Another alternate would be to transport the dirt on CNG/LNG fueled vehicles. We would not denigrate our air Quality much with these fuels.

14-6 I wish to be informed of any decisions made or meetings scheduled regarding this matter.

Sincerely,

Mary DeKorte
Signature

10/18/12
Date

9110 HADDON AVE
Address
SUN VALLEY 91352

818-478-5222
Contact Information

Letter #14

Mary DeKorte
9110 Haddon Avenue
Sun Valley, California 91352

14-1 Based on comments received on the Draft EIR, LADWP and Los Angeles County have re-evaluated the feasibility of soil transport via conveyor for the TSG project. Mitigation Measure AIR-1 has been defined and will be adopted for the proposed project. Under this Mitigation Measure, the majority of soils excavated as part of project construction will be transported off-site via an electric-powered conveyor system to Boulevard Pit near the intersection of Laurel Canyon Boulevard and Tujunga Wash Channel (please see Final EIR Section 2). Therefore, the 256 truck trips per day for disposal of approximately 1.3 million cubic yards of soil estimated in the Draft EIR will not occur. The majority of soils will be transported via conveyor; a small number of truck trips may be necessary for transport of soil loads not suitable for use at Boulevard Pit (e.g., larger size material). The specific number of these trips is not known. However, based on the existing information, most of the soil is anticipated to be acceptable to Vulcan Materials Company for re-use at Boulevard Pit, and therefore the majority of soils will be transported via conveyor. Additionally, soils from Basins 4 and 5 will be trucked across Sheldon Street and taken to the conveyor loading point.

14-2 A Health Risk Assessment (HRA) for the construction period was conducted which included the soil hauling trips that are no longer anticipated. Even with the inclusion of the soil hauling truck trips, the health risks did not exceed SCAQMD thresholds at any residential or sensitive receptors (including schools) (Final EIR Section 2 and Appendix A).

14-3 The referenced schools were considered as part of impact assessment. Please see responses to comments 14-1 and 14-2.

14-4 Since the majority of soil transport will be via conveyor, noise generation from hauling trips will be substantially reduced. Please note that a Noise Control Plan will be prepared to control noise generated from on-site construction activity at the TSG.

14-5 Since the majority of soil transport will be via conveyor, alternative fuel vehicles for minor soil hauling may be used, but will not be mandated.

14-6 Comment noted. You are included on the mailing list for the TSG Final EIR.

Letter #15

Los Angeles Department of Water & Power
Environmental Department
111 Hope St room 1044
Los Angeles Ca 90012

Mr. Messinger:

My name is Alberto Romero and I have lived in Sun Valley
(Location-No Holly or Arleta or Sun Valley) for 1 years.

15-1 I am very concerned about the EIR you have circulated regarding the Tujunga Spreading Grounds. I am very much in support of the idea of increasing our ability to recover more storm water to ultimately increase our drinking water supply. I am very concerned about the cost to the health of the residents immediately adjacent to the "Haul Routes" you have
15-2 designated. You are proposing 86,000 round trips to and from the dumping grounds using Diesel Trucks. Diesel Trucks emit many types of harmful emissions, not the least of which is Particulate Matter (PM1) which is a known carcinogenic.

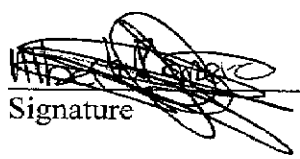
15-3 There are three schools in close proximity to this haul route with approximately 4000 students. In fact there is a fourth school, a charter starting on the campus of Sun Valley High School. It would be a travesty if this haul route with diesel trucks was approved. There are alternatives. Your EIR explored one which was a conveyor belt through the Tujunga Wash itself. This seems a wise use of technology.

Vulcan Materials has used for years a different Technology to move aggregate material all around Sun Valley. Your EIR has rejected this alternate solution and the Community wants this revisited. The cost in dollars has to be less than the cost of the health of the people living near the Basins and within close proximity of the Boulevard pit, as well as the sensitive receptors who are students in the schools.

15-4 There is also a huge amount of noise generated and wear and tear on the roads traveled.
15-5 Another alternate would be to transport the dirt on CNG/LNG fueled vehicles. We would not denigrate our air Quality much with these fuels.

15-6 I wish to be informed of any decisions made or meetings scheduled regarding this matter.

Sincerely,



Signature

10/15/12
Date

9102 Haddon Ave
Address Sun Valley, CA
91352

Contact Information

Letter #15

Alberto Romero
9102 Haddon Avenue
Sun Valley, CA 91352

Please see responses to comments for Letter #14.

Letter #16

Los Angeles Department of Water & Power
Environmental Department
111 Hope St room 1044
Los Angeles Ca 90012

Mr. Messinger:

My name is Reis Hernandez and I have lived in Sun Valley
(Location-No Holly or Arleta or Sun Valley) for 27 years.

16-1 I am very concerned about the EIR you have circulated regarding the Tujunga Spreading Grounds. I am very much in support of the idea of increasing our ability to recover more storm water to ultimately increase our drinking water supply. I am very concerned about the cost to the health of the residents immediately adjacent to the "Haul Routes" you have

16-2 designated. You are proposing 86,000 round trips to and from the dumping grounds using Diesel Trucks. Diesel Trucks emit many types of harmful emissions, not the least of which is Particulate Matter (PM1) which is a known carcinogenic.

16-3 There are three schools in close proximity to this haul route with approximately 4000 students. In fact there is a fourth school, a charter starting on the campus of Sun Valley High School. It would be a travesty if this haul route with diesel trucks was approved. There are alternatives. Your EIR explored one which was a conveyor belt through the Tujunga Wash itself. This seems a wise use of technology.

Vulcan Materials has used for years a different Technology to move aggregate material all around Sun Valley. Your EIR has rejected this alternate solution and the Community wants this revisited. The cost in dollars has to be less than the cost of the health of the people living near the Basins and within close proximity of the Boulevard pit, as well as the sensitive receptors who are students in the schools.

16-4 There is also a huge amount of noise generated and wear and tear on the roads traveled.

16-5 Another alternate would be to transport the dirt on CNG/LNG fueled vehicles. We would not denigrate our air Quality much with these fuels.

16-6 I wish to be informed of any decisions made or meetings scheduled regarding this matter.

Sincerely,

Reis Hernandez
Signature

10/19/12
Date

Address

Contact Information

Letter #16

Ines Hernandez
9116 Haddon Avenue
Sun Valley, CA 91352

Please see responses to comments for Letter #14.

Letter #17

Los Angeles Department of Water & Power
Environmental Department
111 Hope St room 1044
Los Angeles Ca 90012

Mr. Messinger:

My name is Richard Espinoza and I have lived in Sun Valley (Location-No Holly or Arleta or Sun Valley) for 45 years.

17-1 I am very concerned about the EIR you have circulated regarding the Tujunga Spreading Grounds. I am very much in support of the idea of increasing our ability to recover more storm water to ultimately increase our drinking water supply. I am very concerned about the cost to the health of the residents immediately adjacent to the "Haul Routes" you have

17-2 designated. You are proposing 86,000 round trips to and from the dumping grounds using Diesel Trucks. Diesel Trucks emit many types of harmful emissions, not the least of which is Particulate Matter (PM1) which is a known carcinogenic.

17-3 There are three schools in close proximity to this haul route with approximately 4000 students. In fact there is a fourth school, a charter starting on the campus of Sun Valley High School. It would be a travesty if this haul route with diesel trucks was approved. There are alternatives. Your EIR explored one which was a conveyor belt through the Tujunga Wash itself. This seems a wise use of technology.

Vulcan Materials has used for years a different Technology to move aggregate material all around Sun Valley. Your EIR has rejected this alternate solution and the Community wants this revisited. The cost in dollars has to be less than the cost of the health of the people living near the Basins and within close proximity of the Boulevard pit, as well as the sensitive receptors who are students in the schools.

17-4 There is also a huge amount of noise generated and wear and tear on the roads traveled.

17-5 Another alternate would be to transport the dirt on CNG/LNG fueled vehicles. We would not denigrate our air Quality much with these fuels.

17-6 I wish to be informed of any decisions made or meetings scheduled regarding this matter.

Sincerely,

Richard Espinoza
Signature

10.19.12
Date

9140 Haddon Ave
Address

S.V. Ca 91352

Contact Information

Letter #17

Richard Espinoza
9140 Haddon Avenue
Sun Valley, CA 91352

Please see responses to comments for Letter #14.

Letter #18

Los Angeles Department of Water & Power
Environmental Department
111 Hope St room 1044
Los Angeles Ca 90012

Mr. Messinger:

My name is Roy K Inaga and I have lived in Sun Valley CA
(Location-No Holly or Arleta or Sun Valley) for 57 years.

18-1 I am very concerned about the EIR you have circulated regarding the Tujunga Spreading Grounds. I am very much in support of the idea of increasing our ability to recover more storm water to ultimately increase our drinking water supply. I am very concerned about the cost to the health of the residents immediately adjacent to the "Haul Routes" you have
18-2 designated. You are proposing 86,000 round trips to and from the dumping grounds using Diesel Trucks. Diesel Trucks emit many types of harmful emissions, not the least of which is Particulate Matter (PM1) which is a known carcinogenic.

18-3 There are three schools in close proximity to this haul route with approximately 4000 students. In fact there is a fourth school, a charter starting on the campus of Sun Valley High School. It would be a travesty if this haul route with diesel trucks was approved. There are alternatives. Your EIR explored one which was a conveyor belt through the Tujunga Wash itself. This seems a wise use of technology.

Vulcan Materials has used for years a different Technology to move aggregate material all around Sun Valley. Your EIR has rejected this alternate solution and the Community wants this revisited. The cost in dollars has to be less than the cost of the health of the people living near the Basins and within close proximity of the Boulevard pit, as well as the sensitive receptors who are students in the schools.

18-4 There is also a huge amount of noise generated and wear and tear on the roads traveled.
18-5 Another alternate would be to transport the dirt on CNG/LNG fueled vehicles. We would not denigrate our air Quality much with these fuels.

18-6 I wish to be informed of any decisions made or meetings scheduled regarding this matter.

Sincerely,

Roy K Inaga
Signature

10/21/12
Date

9147 Hadden Ave, Sun Valley CA 91352
Address

Contact Information

Letter #18

Roy Imayer
9147 Haddon Avenue
Sun Valley, CA 91352

Please see responses to comments for Letter #14.

Letter #19

Los Angeles Department of Water & Power
Environmental Department
111 Hope St room 1044
Los Angeles Ca 90012

Mr. Messinger:

My name is JOSEPH BRYMER and I have lived in SUN VALLEY (Location-No Holly or Arleta or Sun Valley) for 30 years.

19-1 I am very concerned about the EIR you have circulated regarding the Tujunga Spreading Grounds. I am very much in support of the idea of increasing our ability to recover more storm water to ultimately increase our drinking water supply. I am very concerned about the cost to the health of the residents immediately adjacent to the "Haul Routes" you have designated. You are proposing 86,000 round trips to and from the dumping grounds using

19-2 Diesel Trucks. Diesel Trucks emit many types of harmful emissions, not the least of which is Particulate Matter (PM1) which is a known carcinogenic.

19-3 There are three schools in close proximity to this haul route with approximately 4000 students. In fact there is a fourth school, a charter starting on the campus of Sun Valley High School. It would be a travesty if this haul route with diesel trucks was approved. There are alternatives. Your EIR explored one which was a conveyor belt through the Tujunga Wash itself. This seems a wise use of technology.

Vulcan Materials has used for years a different Technology to move aggregate material all around Sun Valley. Your EIR has rejected this alternate solution and the Community wants this revisited. The cost in dollars has to be less than the cost of the health of the people living near the Basins and within close proximity of the Boulevard pit, as well as the sensitive receptors who are students in the schools.

19-4 There is also a huge amount of noise generated and wear and tear on the roads traveled.

19-5 Another alternate would be to transport the dirt on CNG/LNG fueled vehicles. We would not denigrate our air Quality much with these fuels.

19-6 I wish to be informed of any decisions made or meetings scheduled regarding this matter.

Sincerely,

Signature

10/29/12
Date

9125 HAPPY AVE
Address
SUN VALLEY, CA

Contact Information

Letter #19

Joseph Brymer
9135 Haddon Avenue
Sun Valley, CA 91352

Please see responses to comments for Letter #14.

Letter #20

Los Angeles Department of Water & Power
Environmental Department
111 Hope St room 1044
Los Angeles Ca 90012

Mr. Messinger:

My name is ARTEMIO GARCIA and I have lived in SUN VALLEY (Location-No Holly or Arleta or Sun Valley) for 32 years.

20-1 I am very concerned about the EIR you have circulated regarding the Tujunga Spreading Grounds. I am very much in support of the idea of increasing our ability to recover more storm water to ultimately increase our drinking water supply. I am very concerned about the cost to the health of the residents immediately adjacent to the "Haul Routes" you have designated. You are proposing 86,000 round trips to and from the dumping grounds using
20-2 Diesel Trucks. Diesel Trucks emit many types of harmful emissions, not the least of which is Particulate Matter (PM1) which is a known carcinogenic.

There are three schools in close proximity to this haul route with approximately 4000 students. In fact there is a fourth school, a charter starting on the campus of Sun Valley High School. It would be a travesty if this haul route with diesel trucks was approved. There are alternatives. Your EIR explored one which was a conveyor belt through the
20-3 Tujunga Wash itself. This seems a wise use of technology.

Vulcan Materials has used for years a different Technology to move aggregate material all around Sun Valley. Your EIR has rejected this alternate solution and the Community wants this revisited. The cost in dollars has to be less than the cost of the health of the people living near the Basins and within close proximity of the Boulevard pit, as well as the sensitive receptors who are students in the schools.

20-4 There is also a huge amount of noise generated and wear and tear on the roads traveled.
20-5 Another alternate would be to transport the dirt on CNG/LNG fueled vehicles. We would not denigrate our air Quality much with these fuels.

20-6 I wish to be informed of any decisions made or meetings scheduled regarding this matter.

Sincerely,

Artemio Garcia
Signature

10-18-12
Date

9123 HADDON AVE.
Address SUN

Contact Information

Letter #20

Artemio Garcia
9123 Haddon Avenue
Sun Valley, CA 91352

Please see responses to comments for Letter #14.

Letter #21

Los Angeles Department of Water & Power
Environmental Department
111 Hope St room 1044
Los Angeles Ca 90012

Mr. Messinger:

My name is Don DeKorte and I have lived in Sun Valley (Location-No Holly or Arleta or Sun Valley) for 74 years.

21-1 I am very concerned about the EIR you have circulated regarding the Tujunga Spreading Grounds. I am very much in support of the idea of increasing our ability to recover more storm water to ultimately increase our drinking water supply. I am very concerned about the cost to the health of the residents immediately adjacent to the "Haul Routes" you have designated.

21-2 You are proposing 86,000 round trips to and from the dumping grounds using Diesel Trucks. Diesel Trucks emit many types of harmful emissions, not the least of which is Particulate Matter (PM1) which is a known carcinogenic.

21-3 There are three schools in close proximity to this haul route with approximately 4000 students. In fact there is a fourth school, a charter starting on the campus of Sun Valley High School. It would be a travesty if this haul route with diesel trucks was approved. There are alternatives. Your EIR explored one which was a conveyor belt through the Tujunga Wash itself. This seems a wise use of technology.

Vulcan Materials has used for years a different Technology to move aggregate material all around Sun Valley. Your EIR has rejected this alternate solution and the Community wants this revisited. The cost in dollars has to be less than the cost of the health of the people living near the Basins and within close proximity of the Boulevard pit, as well as the sensitive receptors who are students in the schools.

21-4 There is also a huge amount of noise generated and wear and tear on the roads traveled.

21-5 Another alternate would be to transport the dirt on CNG/LNG fueled vehicles. We would not denigrate our air Quality much with these fuels.

21-6 I wish to be informed of any decisions made or meetings scheduled regarding this matter.

Sincerely,

Signature

11-18-12
Date

9110 Hermosa Ave
Address

Contact Information

Letter #21

Don DeKorte
9110 Haddon Avenue
Sun Valley, CA 91352

Please see responses to comments for Letter #14.

Letter #22

Los Angeles Department of Water & Power
Environmental Department
111 Hope St room 1044
Los Angeles Ca 90012

Mr. Messinger:

My name is Jorge De Santiago and I have lived in Sun Valley (Location-No Holly or Arleta or Sun Valley) for 22 years.

22-1 I am very concerned about the EIR you have circulated regarding the Tujunga Spreading Grounds. I am very much in support of the idea of increasing our ability to recover more storm water to ultimately increase our drinking water supply. I am very concerned about the cost to the health of the residents immediately adjacent to the "Haul Routes" you have

22-2 designated. You are proposing 86,000 round trips to and from the dumping grounds using Diesel Trucks. Diesel Trucks emit many types of harmful emissions, not the least of which is Particulate Matter (PM1) which is a known carcinogenic.

22-3 There are three schools in close proximity to this haul route with approximately 4000 students. In fact there is a fourth school, a charter starting on the campus of Sun Valley High School. It would be a travesty if this haul route with diesel trucks was approved. There are alternatives. Your EIR explored one which was a conveyor belt through the Tujunga Wash itself. This seems a wise use of technology.

Vulcan Materials has used for years a different Technology to move aggregate material all around Sun Valley. Your EIR has rejected this alternate solution and the Community wants this revisited. The cost in dollars has to be less than the cost of the health of the people living near the Basins and within close proximity of the Boulevard pit, as well as the sensitive receptors who are students in the schools.

22-4 There is also a huge amount of noise generated and wear and tear on the roads traveled.

22-5 Another alternate would be to transport the dirt on CNG/LNG fueled vehicles. We would not denigrate our air Quality much with these fuels.

22-6 I wish to be informed of any decisions made or meetings scheduled regarding this matter.

Sincerely,

Jorge De Santiago
Signature

10-23-2012
Date

9132 Haddon Ave Sun Valley
Address

Contact Information

Letter #22

Jorge De Santiago
9132 Haddon Avenue
Sun Valley, CA 91352

Please see responses to comments for Letter #14.

Letter #23

Los Angeles Department
of Water & Power
Environmental Department
111 Hope St room 1044
Los Angeles Ca 90012

Mr.Hal Messinger:

My name is SARAH A. SERVERA and I have lived in 9168 ONEIDA AVE. (Location-No Holly or Arleta or Sun Valley) for 40 years.

23-1 During all this time I have had to look at this location of the Tujunga Spreading Basins when I drive near my home, it is a classic example of urban blight. It is disgraceful that a City agency is allowed to keep a facility like this in such a deplorable condition. I am saddened every time I drive past this facility and see the weeds and tumbleweeds where sidewalks should be. Thankfully someone has gone in and cleared the past years collection of weeds, from both sides of Sheldon St, north of Roscoe Blvd.

23-2 Everyone in this area understands the need to expand the capacity of the spreading basins to increase the City's drinking water supply but now is the time for this area to be cleaned up and made a little more attractive. First thing is sidewalks, We want sidewalks around the perimeter of the facility with street trees where they don't exist. We want hedges about eight feet tall on the inside of the fences. This will clean up the look of a desert scenario and erase the urban blight feel and look. We need ground cover all along the berm on Roscoe that is between the fence above and the sidewalk below. It is time for the Department of Water & Power to step up and become a good neighbor.

23-3 Please put me on any and all lists to receive notices, agendas of meetings and/or decisions made about this EIR.

Sincerely

Sarah A. Servera
Signature

10-22-12
Date

9168 Oneida Ave.
Address Sun Valley, Ca 91352

Contact Information

Letter #23

Sarah Servera
9168 Oneida Avenue
Sun Valley, California 91352

23-1 Upgrade of the landscaping of the TSG facility is included in the proposed project. Conceptual renderings of the proposed improvements are included in Section 2 of the Final EIR. The specific facilities to be installed have not been finalized but may include trails and jogging paths, trees and other plantings, and benches. Native species with low water requirements will be used as plantings to the extent feasible. Landscape maintenance is noted in the Draft EIR (Section 3.4). As compared with the existing condition of the site, the project-related impact on aesthetics will be beneficial.

23-2 Sidewalks and trees are included in the landscaping plans for the facility. Split rail fencing, decomposed granite pathways, and native vegetation may also be included. Please see the conceptual renderings included in Section 2 of the Final EIR.

23-3 Comment noted. You are included on the mailing list for the TSG Final EIR.

Letter #24

Los Angeles Department
of Water & Power
Environmental Department
111 Hope St room 1044
Los Angeles Ca 90012

Mr.Hal Messinger:

My name is Oneelya Brymer and I have lived in Sun Valley (Location-No Holly or Arleta or Sun Valley) for 37 years.

24-1 During all this time I have had to look at this location of the Tujunga Spreading Basins when I drive near my home, it is a classic example of urban blight. It is disgraceful that a City agency is allowed to keep a facility like this in such a deplorable condition. I am saddened every time I drive past this facility and see the weeds and tumbleweeds where sidewalks should be. Thankfully someone has gone in and cleared the past years collection of weeds, from both sides of Sheldon St, north of Roscoe Blvd.

24-2 Everyone in this area understands the need to expand the capacity of the spreading basins to increase the City's drinking water supply but now is the time for this area to be cleaned up and made a little more attractive. First thing is sidewalks, We want sidewalks around the perimeter of the facility with street trees where they don't exist. We want hedges about eight feet tall on the inside of the fences. This will clean up the look of a desert scenario and erase the urban blight feel and look. We need ground cover all along the berm on Roscoe that is between the fence above and the sidewalk below. It is time for the Department of Water & Power to step up and become a good neighbor.

24-3 Please put me on any and all lists to receive notices, agendas of meetings and/or decisions made about this EIR.

Sincerely

Oneelya Brymer
Signature

10/19/12
Date

9135 Hatton Ave
Address
Sun Valley

Contact Information

Letter #24

Areelux Brymer
9135 Haddon Avenue
Sun Valley, California 91352

Please see responses to comments to Letter #23.

Letter #25

Los Angeles Department
of Water & Power
Environmental Department
111 Hope St room 1044
Los Angeles Ca 90012

Mr.Hal Messinger:

My name is JOSEPH BRYMER and I have lived in Sun Valley Location-No Holly or Arleta or Sun Valley) for 37 years.

25-1 During all this time I have had to look at this location of the Tujunga Spreading Basins when I drive near my home, it is a classic example of urban blight. It is disgraceful that a City agency is allowed to keep a facility like this in such a deplorable condition. I am saddened every time I drive past this facility and see the weeds and tumbleweeds where sidewalks should be. Thankfully someone has gone in and cleared the past years collection of weeds, from both sides of Sheldon St, north of Roscoe Blvd.

25-2 Everyone in this area understands the need to expand the capacity of the spreading basins to increase the City's drinking water supply but now is the time for this area to be cleaned up and made a little more attractive. First thing is sidewalks, We want sidewalks around the perimeter of the facility with street trees where they don't exist. We want hedges about eight feet tall on the inside of the fences. This will clean up the look of a desert scenario and erase the urban blight feel and look. We need ground cover all along the berm on Roscoe that is between the fence above and the sidewalk below. It is time for the Department of Water & Power to step up and become a good neighbor.

25-3 Please put me on any and all lists to receive notices, agendas of meetings and/or decisions made about this EIR.

Sincerely

Joseph Brymer
Signature

10/19/2012
Date

9135 HAZELTON AVE
Address
SUN VALLEY CA

818-767-4464
Contact Information

Letter #25

Joseph Brymer
9135 Haddon Avenue
Sun Valley, California 91352

Please see responses to comments to Letter #23.

Letter #26

Los Angeles Department
of Water & Power
Environmental Department
111 Hope St room 1044
Los Angeles Ca 90012

Mr.Hal Messinger:

My name is BLANCA GARCIA and I have lived in SUN VALLEY Location-No Holly or Arleta or Sun Valley) for 32 years.

26-1 During all this time I have had to look at this location of the Tujunga Spreading Basins when I drive near my home, it is a classic example of urban blight. It is disgraceful that a City agency is allowed to keep a facility like this in such a deplorable condition. I am saddened every time I drive past this facility and see the weeds and tumbleweeds where sidewalks should be. Thankfully someone has gone in and cleared the past years collection of weeds, from both sides of Sheldon St, north of Roscoe Blvd.

26-2 Everyone in this area understands the need to expand the capacity of the spreading basins to increase the City's drinking water supply but now is the time for this area to be cleaned up and made a little more attractive. First thing is sidewalks, We want sidewalks around the perimeter of the facility with street trees where they don't exist. We want hedges about eight feet tall on the inside of the fences. This will clean up the look of a desert scenario and erase the urban blight feel and look. We need ground cover all along the berm on Roscoe that is between the fence above and the sidewalk below. It is time for the Department of Water & Power to step up and become a good neighbor.

26-3 Please put me on any and all lists to receive notices, agendas of meetings and/or decisions made about this EIR.

Sincerely

Blanca Garcia
Signature

10-18-12
Date

9123 HADDON AVE.
Address

Contact Information

Letter #26

Blanca Garcia
9123 Haddon Avenue
Sun Valley, California 91352

Please see responses to comments to Letter #23.

Letter #27

Los Angeles Department
of Water & Power
Environmental Department
111 Hope St room 1044
Los Angeles Ca 90012

Mr.Hal Messinger:

My name is Joan DeKorte and I have lived in Sun Valley (Location-No Holly or Arleta or Sun Valley) for 74 years.

27-1 During all this time I have had to look at this location of the Tujunga Spreading Basins when I drive near my home, it is a classic example of urban blight. It is disgraceful that a City agency is allowed to keep a facility like this in such a deplorable condition. I am saddened every time I drive past this facility and see the weeds and tumbleweeds where sidewalks should be. Thankfully someone has gone in and cleared the past years collection of weeds, from both sides of Sheldon St, north of Roscoe Blvd.

27-2 Everyone in this area understands the need to expand the capacity of the spreading basins to increase the City's drinking water supply but now is the time for this area to be cleaned up and made a little more attractive. First thing is sidewalks, We want sidewalks around the perimeter of the facility with street trees where they don't exist. We want hedges about eight feet tall on the inside of the fences. This will clean up the look of a desert scenario and erase the urban blight feel and look. We need ground cover all along the berm on Roscoe that is between the fence above and the sidewalk below. It is time for the Department of Water & Power to step up and become a good neighbor.

27-3 Please put me on any and all lists to receive notices, agendas of meetings and/or decisions made about this EIR.

Sincerely

Signature

11-18-12
Date

9110 Hassan Ave
Address

Contact Information

Letter #27

Don DeKorte
9110 Haddon Avenue
Sun Valley, California 91352

Please see responses to comments to Letter #23.

Letter #28

Los Angeles Department
of Water & Power
Environmental Department
111 Hope St room 1044
Los Angeles Ca 90012

Mr.Hal Messinger:

My name is MARY DEKORTE and I have lived in SUN VALLEY Location-No Holly or Arleta or Sun Valley) for 63 years.

28-1 During all this time I have had to look at this location of the Tujunga Spreading Basins when I drive near my home, it is a classic example of urban blight. It is disgraceful that a City agency is allowed to keep a facility like this in such a deplorable condition. I am saddened every time I drive past this facility and see the weeds and tumbleweeds where sidewalks should be. Thankfully someone has gone in and cleared the past years collection of weeds, from both sides of Sheldon St, north of Roscoe Blvd.

28-2 Everyone in this area understands the need to expand the capacity of the spreading basins to increase the City's drinking water supply but now is the time for this area to be cleaned up and made a little more attractive. First thing is sidewalks, We want sidewalks around the perimeter of the facility with street trees where they don't exist. We want hedges about eight feet tall on the inside of the fences. This will clean up the look of a desert scenario and erase the urban blight feel and look. We need ground cover all along the berm on Roscoe that is between the fence above and the sidewalk below. It is time for the Department of Water & Power to step up and become a good neighbor.

28-3 Please put me on any and all lists to receive notices, agendas of meetings and/or decisions made about this EIR.

Sincerely

Mary DeKorte
Signature

10/18/12
Date

9110 Haddon Ave
Sun Valley
Address

818 478-5222
Contact Information

Letter #28

Mary DeKorte
9110 Haddon Avenue
Sun Valley, California 91352

Please see responses to comments to Letter #23.

Letter #29

Los Angeles Department
of Water & Power
Environmental Department
111 Hope St room 1044
Los Angeles Ca 90012

Mr.Hal Messinger:

My name is Rei Hernandez and I have lived in 9116 Haddon Ave Location-No Holly or Arleta or Sun Valley) for 27 years.

29-1 During all this time I have had to look at this location of the Tujunga Spreading Basins when I drive near my home, it is a classic example of urban blight. It is disgraceful that a City agency is allowed to keep a facility like this in such a deplorable condition. I am saddened every time I drive past this facility and see the weeds and tumbleweeds where sidewalks should be. Thankfully someone has gone in and cleared the past years collection of weeds, from both sides of Sheldon St, north of Roscoe Blvd.

29-2 Everyone in this area understands the need to expand the capacity of the spreading basins to increase the City's drinking water supply but now is the time for this area to be cleaned up and made a little more attractive. First thing is sidewalks, We want sidewalks around the perimeter of the facility with street trees where they don't exist. We want hedges about eight feet tall on the inside of the fences. This will clean up the look of a desert scenario and erase the urban blight feel and look. We need ground cover all along the berm on Roscoe that is between the fence above and the sidewalk below. It is time for the Department of Water & Power to step up and become a good neighbor.

29-3 Please put me on any and all lists to receive notices, agendas of meetings and/or decisions made about this EIR.

Sincerely

Rei Hernandez
Signature

10/19/12
Date

Address

Contact Information

Letter #29

Ines Hernandez
9116 Haddon Avenue
Sun Valley, California 91352

Please see responses to comments to Letter #23.

Letter #30

Los Angeles Department
of Water & Power
Environmental Department
111 Hope St room 1044
Los Angeles Ca 90012

Mr.Hal Messinger:

My name is Enedina Espinoza and I have lived in Sun Valley (Location-No Holly or Arleta or Sun Valley) for 48 years.

30-1 During all this time I have had to look at this location of the Tujunga Spreading Basins when I drive near my home, it is a classic example of urban blight. It is disgraceful that a City agency is allowed to keep a facility like this in such a deplorable condition. I am saddened every time I drive past this facility and see the weeds and tumbleweeds where sidewalks should be. Thankfully someone has gone in and cleared the past years collection of weeds, from both sides of Sheldon St, north of Roscoe Blvd.

30-2 Everyone in this area understands the need to expand the capacity of the spreading basins to increase the City's drinking water supply but now is the time for this area to be cleaned up and made a little more attractive. First thing is sidewalks, We want sidewalks around the perimeter of the facility with street trees where they don't exist. We want hedges about eight feet tall on the inside of the fences. This will clean up the look of a desert scenario and erase the urban blight feel and look. We need ground cover all along the berm on Roscoe that is between the fence above and the sidewalk below. It is time for the Department of Water & Power to step up and become a good neighbor.

30-3 Please put me on any and all lists to receive notices, agendas of meetings and/or decisions made about this EIR.

Sincerely

Enedina Espinoza
Signature

10.19.12
Date

9140 Hadamlee.
S.V. Ca 91352
Address

Contact Information

Letter #30

Enedina Espinoza
9140 Haddon Avenue
Sun Valley, California 91352

Please see responses to comments to Letter #23.

Letter #31

Los Angeles Department
of Water & Power
Environmental Department
111 Hope St room 1044
Los Angeles Ca 90012

Mr.Hal Messinger:

My name is Deanne Gray and I have lived in Sun Valley (Location-No Holly or Arleta or Sun Valley) for 3 years.

31-1 During all this time I have had to look at this location of the Tujunga Spreading Basins when I drive near my home, it is a classic example of urban blight. It is disgraceful that a City agency is allowed to keep a facility like this in such a deplorable condition. I am saddened every time I drive past this facility and see the weeds and tumbleweeds where sidewalks should be. Thankfully someone has gone in and cleared the past years collection of weeds, from both sides of Sheldon St, north of Roscoe Blvd.

31-2 Everyone in this area understands the need to expand the capacity of the spreading basins to increase the City's drinking water supply but now is the time for this area to be cleaned up and made a little more attractive. First thing is sidewalks, We want sidewalks around the perimeter of the facility with street trees where they don't exist. We want hedges about eight feet tall on the inside of the fences. This will clean up the look of a desert scenario and erase the urban blight feel and look. We need ground cover all along the berm on Roscoe that is between the fence above and the sidewalk below. It is time for the Department of Water & Power to step up and become a good neighbor.

31-3 Please put me on any and all lists to receive notices, agendas of meetings and/or decisions made about this EIR.

Sincerely

Deanne Gray
Signature

10-21-12
Date

11965 Weddington St
Address

(818) 428-9491
Contact Information

Letter #31

Diane Gray
11965 Wicks Street
Sun Valley, California 91352

Please see responses to comments to Letter #23.

Appendix A – Air Quality Evaluation

APPENDIX A

Air Quality Evaluation

(Revised for the Final EIR)

Tujunga Spreading Grounds
Air Quality Evaluation

An evaluation of potential impacts to air quality was prepared for the Tujunga Spreading Grounds Environmental Impact Report. The analysis was prepared based on information regarding the construction scenario, truck traffic estimates, and schedule, and was conducted based on approaches set forth in the SCAQMD's *CEQA Air Quality Handbook*[1], the SCAQMD's *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*[2], and other guidance documents from the SCAQMD and the U.S. EPA. The analysis addressed emissions from construction equipment, truck traffic, and fugitive dust generated during construction activities. The analysis also included a screening health risk assessment to evaluate whether the truck traffic and construction equipment would pose a potential health risk to the surrounding community. [The analysis is an assessment of project emissions prior to implementation of mitigation measures, including the soil conveyor to Boulevard Pit. With implementation of Mitigation Measures AIR-1 through AIR-16, emissions will be reduced.]

The project involves the following activities:

- Alter the current intake facility to capture low flows from Tujunga Wash and install a trash rack to improve water quality. Low flows will pass under I-5 using existing conveyance pipe and will be released into the reactivated basins located southeast of the freeway interchange. These basins will be improved to provide treatment prior to recharging the groundwater.
- Install two new intake facilities to capture high flows from the Tujunga and Pacoima Diversion Washes. Intake No. 1 will be located immediately southwest of the freeway interchange and will divert 250 cubic feet per second (cfs) into the upper portion of the TSG. Intake No. 2 will be located immediately downstream of the confluence of the Tujunga Wash and Pacoima Wash Channels and will divert a maximum of 200 cfs into the lower portion of the TSG. Two inflatable rubber dams (60-foot-wide and 104-footwide) will be used to direct Tujunga Wash and Pacoima Wash flows to the spreading basins.
- Install devices to prevent widespread distribution of trash within the TSG.
- Reactivate, deepen and/or combine basins to increase the facility's storage and recharge capacity. The existing TSG Basins A through N and Q through T will be graded to accept water from either intake system. The existing overflow from Basin B will continue to act as an overflow to Tujunga Wash. Basins O and P, which are the dormant, uppermost basins, located between I-5 and SR-170, will be reactivated, deepened, and able to accept low flows throughout the dry season, and may be able to accept flows during the wet season, depending on operational limitations and available flows. All basins west of SR-

[1] SCAQMD. 1993. *CEQA Air Quality Handbook*. As revised 1999.
[2] SCAQMD. 2003. *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*.

170 (Basins A through N and Q through T) will be deepened, and some combined, increasing storage and recharge capacity.
- Replace existing canal and flashboard structures (which connect and allow water to flow between basins) with modernized inter-basin weir structures and by-pass gates. All new diversion facilities will be automated; operation will be managed remotely from LADWP's on-site facility.
- Fence the TSG facility. Adjacent to freeways, private property, and the Tujunga Wash Channel, chain link fence will be installed. The fence fronting the public right-of-way at Basins 3, 6, 7, 8, and 9 will be 8-ft tall tubular steel fence. The fence fronting the public right-of-way at Basins O, 1, 2, 4, and 5 will be split rail fence.

As proposed (prior to implementation of mitigation measures including the soil conveyor to Boulevard Pit), the project would generate approximately 174,080 one-way truck trips, either inbound or outbound from the Tujunga Spreading Grounds. Based on the potential disposal sites, four haul routes were evaluated:

- Alternative 1: North on Arleta Avenue, east on Branford Street to the Boulevard Pit; returning south on San Fernando Road, west on Sheldon Street to the Tujunga Spreading Grounds.
- Alternative 2: East/west on Sheldon Street to the Sheldon Pit.
- Alternative 3: East/west on Sheldon Street to the CalMat Disposal Site.
- Alternative 4: East on Sheldon Street, south on Glenoaks Blvd. to the Bradley Landfill, returning on Peoria Street, west on Tuxford Street and Roscoe Blvd. to the Tujunga Spreading Grounds.

Emission Calculations

Emissions were calculated for heavy construction equipment, worker vehicles, construction trucks (including haul trucks transported excavated material to the disposal site), and fugitive dust generation. Information on the number, type, and duration of operation of heavy construction equipment was provided by LADWP. Information on trucks trips and routes used to dispose of excavated material were also provided by LADWP. Based on the information provided, the emissions were calculated for the following main construction phases: (1) Excavation and deepening of the spreading basins; (2) Construction of intakes and overflow infrastructure; and (3) Installation of the RCP interbasin conduit.

Construction equipment emissions were calculated based on the SCAQMD's OFFROAD emission factors[3] for heavy equipment. Horsepower ratings were estimated by LADWP, and represent conservative estimates of the sizes of equipment that will be utilized. It was conservatively assumed that four areas would be excavated on any single day.

[3] SCAQMD. http://www.aqmd.gov/ceqa/handbook/offroad/offroad.html.

Emissions from worker vehicles and truck traffic were estimated based on the ARB's EMFAC2011 Model[4], assuming that workers would utilize light-duty trucks, and that truck traffic was represented as heavy heavy-duty trucks (Category T7 - Construction). Based on information from LADWP, a total of 174,080 truck trips would be required to transport excavated material to the disposal site. This is equivalent to 128 trucks per day. For conservative purposes, it was assumed that trucks would travel 30 miles per hour on average on surface streets. It was also assumed that trucks would idle at the Tujunga Spreading Grounds during material transfer and entrance/exit from the facility, and that they would also idle at the disposal site. The total idling time was assumed to be 15 minutes based on recommendations from the SCAQMD. Idling emissions were calculated based on emission factors from the EMFAC2011 model. Emissions for the truck trips included fugitive dust emissions associated with travel on paved unpaved surfaces. It was assumed that trucks would travel 500 feet on unpaved surfaces at the Tujunga Spreading Grounds and 500 feet on unpaved surfaces at the disposal location, for a total travel distance of 1,000 feet per truck trip.

While the excavation would not occur during the rainy season, due to the nature of the site's use, material at the site would be moist. It was assumed that the moisture content would either be similar to that achieved through watering the site three times daily (61% control efficiency), or that LADWP would water on-site unpaved access roads to reduce fugitive dust. Emissions from travel on paved and unpaved surfaces were calculated based on the U.S. EPA's AP-42 emission equations for paved roads[5] and for unpaved roads[6].

Emissions of fugitive dust from material handling and bulldozing were calculated based on the equations in the SCAQMD's CEQA Air Quality Handbook. Bulldozers would be used to excavate material and load trucks. Trucks would then travel to the disposal site, where the material would be deposited. Scrapers would not be used to load trucks. As discussed above, the material would be moist.

Emission calculations are provided in the tables in this appendix.

Health Risk Assessment

To address potential exposure to diesel particulate matter from haul trucks, idling of trucks, and construction heavy equipment, a screening health risk assessment was conducted. The health risk assessment was conducted in accordance with SCAQMD guidance. On-road diesel sources were represented as volume sources with a dimension of 50 meters by 50 meters, placed with a spacing of 50 meters along the roads that would be traveled under each individual alternative. To calculate diesel particulate from individual volume sources, the EMFAC2011 emission factors for PM_{10} were used. The emission factors are provided in units of grams per vehicle mile traveled. Each volume source represents 50 meters of travel, or 0.031 miles of travel, along the

[4] ARB. http://www.arb.ca.gov/msei/modeling.htm.
[5] U.S. EPA. 2011. *Compilation of Air Pollutant Emission Factors, Chapter 13.2.1, Paved Roads*. January.
[6] U.S. EPA. 2006. *Compilation of Air Pollutant Emission Factors, Chapter 13.2.2, Unpaved Roads*. November.

roadway. Thus the mass emissions per source were calculated using the emission factors based on a distance of 0.031 miles. In addition to on-road travel, the analysis included two idling sources: one source at the Tujunga Spreading Grounds site, and one source at the disposal site. Emissions from idling were calculated based on the PM_{10} emission factor for heavy-duty truck idling from the EMFAC2011 model.

Construction heavy equipment would be used at the Tujunga Spreading Grounds site. The emissions from heavy construction equipment were represented as a series of volume sources at the Tujunga Spreading Grounds basins as recommended in SCAQMD guidance for modeling of construction activities[7]. Construction emissions were calculated based on the estimates of heavy construction equipment PM_{10} exhaust calculated in the construction emissions evaluation. The overall duration of construction was included in the calculation to estimate the total pounds of emissions for each phase of construction.

Emissions were modeled using the U.S. EPA's AERMOD model, which is the currently approved air dispersion model for evaluating downwind impacts. A grid of receptors with 100-meter spacing was placed over the study area. Receptors at the Tujunga Spreading Grounds site itself and at the disposal site (for each alternative) were removed from the AERMOD model, as these receptors would not be considered to represent ambient exposure. The AERMOD model was run using meteorological data from the Burbank monitoring site, which is the closest meteorological monitoring site to the Tujunga Spreading Grounds area. The model was run assuming urban dispersion, with a population in the region of 153,942. Individual model runs were made for the on-road trucks, truck idling sources, and construction sources.

For conservative purposes, potential health risks were calculated based on a lifetime residential exposure scenario (70 years), using the exposure parameters recommended by the Office of Environmental Health Hazard Assessment (OEHHA)[8], and the 80th percentile breathing rate recommended by the ARB[9]. The excess cancer risk calculations were adjusted to account for the temporary nature of the construction activities. The health risk assessment results are presented in the following table. Model input and output files are provided electronically, and the calculation spreadsheets are provided in this appendix.

Alternative	Excess Cancer Risk
1	4.01 in a million
2	3.99 in a million
3	3.99 in a million
4	4.06 in a million

As shown in the table, impacts are below the SCAQMD's significance threshold of 10 in a million.

[7] SCAQMD. 2003. *Final Localized Significance Threshold Methodology*. June.
[8] OEHHA. 2003. *The Air Toxics Hot Spots Program Guidance Manual f or Preparation of Health Risk Assessments*. August.
[9] ARB. 2003. *Air Resources Board Recommended Interim Risk Management Policy for Inhalation-Based Residential Cancer Risk*. October 9.

Appendix B – Public Meeting Sign-in Sheet and List of Commenters on the Draft EIR

APPENDIX B

Sign-in Sheet for the Public Meeting on the Draft EIR

(September 12, 2012)

and

List of Commenters on the Draft EIR

LADWP

Tujunga Spreading Grounds Enhancement Project
Draft Environmental Impact Report
Public Meeting
Sign-in Sheet

September 12, 2012

Name/Organization	Email Address
SUN VALLEY AREA NEIGHBORHOOD COUNCIL	MIKEOGARASVANC@AOL.COM MIKE O'GARA
Sun Valley AReA Gary Aggas Neighborhood Council	GaryAggas@SBCGlobal.Net
County of LosAngeles Alma Fuentes	afuentes@ladpw.org
RAFAEL VILLEGAS LADWP WATERSHED MGMT	RAFAEL.VILLEGAS@LADWP.com
Sergio Ibarra Arleta NC	Sergio.Ibarra@my.csun.edu
Tania Oronoz CD6-	tania.oronoz@lacity.org
Lorena Bernal	lorena.bernal@lacity.org
MONICA VACAS	monica.Vacas@SVANC.org

LADWP

Tujunga Spreading Grounds Enhancement Project
Draft Environmental Impact Report
Public Meeting
Sign-in Sheet

September 12, 2012

Name/Organization	Email Address
Sulma Hernandez, CD6	sulma.hernandez2@lacity.org
Jim Kompare	JWKompare@hotmail.com
Claudia Nelson	claudianelsn@gmail.com
Rachael Ortega	

List of Commenters on the Tujunga Spreading Grounds Enhancement Project Draft EIR (Written Comments)

Dave Singleton, Program Analyst Native American Heritage Commission 915 Capitol Mall, Room 364 Sacramento, CA 95814	Gerald Gubatan, Chief Planning Deputy Office of Council Member Richard Alarcon City Hall 200 Spring Street, Room 470 Los Angeles, CA 90012	Richard Espinoza 9140 Haddon Avenue Sun Valley, CA 91352
Phillip Crader, Manager State Water Resources Control Board 1001 I Street Sacramento, CA 95814	Monica Vacas, Chairperson SVANC-Planning and Land Use Committee 900 Sunland Boulevard, Suite "A" Sun Valley, CA 91352	Roy Imayer 9147 Haddon Avenue Sun Valley, CA 91352
Dianna Watson, IRG/CEQA Branch Chief California Department of Transportation 100 Main Street Los Angeles, CA 90012-3606	Linda Housden Sun Valley Area Council Board Member lindahousden@yahoo.com	Joseph Brymer 9135 Haddon Avenue Sun Valley, CA 91352
Ian MacMillan, Program Supervisor, Inter-Governmental Review South Coast Air Quality Management District 21865 Copley Drive Diamond Bar, CA 91765-4182	Jack Lindblad, Architect and Urban Planner Arleta Neighborhood Council Community Improvement Committee Chair 9300 Laurel Canyon Boulevard, Second Floor Arleta, California 91331	Sergio Ibarra, MPA Arleta Neighborhood Council President 9300 Laurel Canyon Boulevard, Second Floor Arleta, California 91331
Mike O'Gara 9301 Cayuga Avenue Sun Valley, CA 91352	Richard Alarcon, Councilmember, Seventh District City Hall 200 Spring Street, Room 470 Los Angeles, California 90012	Don DeKorte 9110 Haddon Avenue Sun Valley, CA 91352
Gary Aggas 11211 Cohasset Street Sun Valley, CA 91352	Mary DeKorte 9110 Haddon Avenue Sun Valley, California 91352	Jorge De Santiago 9132 Haddon Avenue Sun Valley, CA 91352
Richard C. Slade, Watermaster 12750 Ventura Boulevard, Suite 202 Studio City, CA 91604	Alberto Romero 9102 Haddon Avenue Sun Valley, CA 91352	Sarah Servera 9168 Oneida Avenue Sun Valley, California 91352
Enedina Espinoza 9140 Haddon Avenue Sun Valley, California 91352	Ines Hernandez 9116 Haddon Avenue Sun Valley, CA 91352	Areelux Brymer 9135 Haddon Avenue Sun Valley, California 91352

Artemio Garcia 9123 Haddon Avenue Sun Valley, CA 91352	Blanca Garcia 9123 Haddon Avenue Sun Valley, California 91352	Diane Gray 11965 Wicks Street Sun Valley, California 91352

Appendix C – Petition

APPENDIX C

Petition to Oppose Diesel Emissions Process of the LADWP Tujunga Spreading Grounds Enhancement Project

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sign and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
Inés Hernández	9116 Haddon Ave	Yes!		10/19/2012
Inés Hernández	Sun Valley, CA 91352	IH		
Stephanie Alvarado	9140 Haddon ave.	Yes		10.19.12
Stephanie Alvarado	Sun Valley CA 91352	SA		
Enedina R. Espinoza	9140 Haddon Ave	yes		10-19-12
Enedina Espinoza	N. Valley Ca. 91352	E.R.E.		
Christina Rosado	9140 Haddon Ave	Yes		10-19-12
Christina Rosado	Sun Valley Ca 91352	CR		
Amanda Alvarado	9140 Haddon Ave	Yes		10/19/12
Amanda Alvarado	Sun Valley Ca 91352	AAA		
Richard Espinoza	9140 Haddon ave	Yes		10-19-12
Richard Espinoza	9140 Haddon Ave	yes		
Lutin Ross	9221-HADDON-Ave	Yes		10/20/12
LUTIN-ROSS	9220 Haddon Ave	LR		

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sign and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
JOSEPH BRYMER Joseph Brymer	9135 HADDON AVE SUN Valley, CA 91352	JAB Yes		10/17/2012
MARY DEKORTE Mary DeKorte	9110 HADDON AVE SUN VALLEY, CA 91352	MD Yes		10/18/2012
Don DeKORTE [illegible]	9110 Haddon Ave Sun Valley, CA 91352	[illegible] Yes		10/18/12
[illegible] [illegible]	9102 Haddon Ave Sun Valley Ca 9135[illegible]	A.R. [illegible]		10/18/12
ARTEMIO GARCIA Artemio Garcia	9123 HADDON AVE SUN VALLEY CA 91352	AG Yes		10-18-12
BLANCA GARCIA Blanca Garcia	9123 HADDON AVE SUN VALLEY CA 91352	BG Yes		10-18-12
ARCELIA BRYMER Arcelia Brymer	9135 HADDON Ave SUN Valley, CA 91352	AB Yes		10/19/12

818 7711359

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sign and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
Roy K Imeson Roy K Imeson	9197 Haddon Ave Sun Valley CA 9135[illegible]	RKI "		10/21/12
Sarah A. Servera Anthony F Servera	9168 ONEIDA AVE. Sun Valley, Ca 91352	yes yes		10/22/12
Jacqueline Santiago Jacqueline Santiago	9132 HADDON AVE Sun Valley CA	J.D.S YES		10/23/12

V

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sign and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
Ronald Cisneros	Sun Valley, CA 11832 Peoria Ave	RC		10/27/12
Veronica Castaneda	11877 Randleford Sun Valley CA 91352	VC		10/20/12
Leonor Orena	8820 felfair Sun Valley CA 91352	LO		10/27/12
Rosalio Zambrano	11807 Necnach Sun Valley CA	RZ		10/27/12
Fernando Zambrano	11807 NECNACH Sun Valley			10/27/12

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sgn and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
Patrick Moscon [signature]	451 S. Hudson ave Pasadena CA 91101	PM		10-26-12
Mary Claypool [signature]	16617 Bircher St Granada Hills 91344	MC		10-26-12
[signature] Zickler	11948 Wicks ST. Sun Valley Ca	MZ		10/27/12
Maria Hezaeca [signature]	13349 Saticoy St #4 N. Hollywood CA 91605	M.H.		10/27/12
Irais Ramirez	11811 Snelling ST. Sun Valley CA	I R		10-22-12
Griselda Ces [signature]	8944 Telfair Av Sun Valley CA 91352	G.C		10-27-12
Alonso Acosta [signature]	8116 Telfair Avenue Sun Valley, CA 91352	AA		10/21/12

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sgn and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
Martha Gonzalez Martha Gonzalez	12002 Allegheny #208 Sun Valley, CA. 91352	M.G		10-21-12
Felipe Gomez	12002 Allegheny #208 Sun Valley, CA 91352	F.G		10-21-12
Maria Haro	11975 Allegheny St	m.H		10-21-12
Miguel De Haro Miguel D	12002 Allegheny st ~~Sun~~ Sun Valley, CA 91352	m H		10-21-12
Maria Contreras Maria C	11985 Wicks st. Sun Valley	M.C		10-22-12
Miguel Contreras Miguel C	11985 WICKS St. Sun Valley	CM		10-22-12
Chris Jacobson	17200 Parthenia St. Northridge Ca 91325	CJ		10-25-12

I Prefer No dirt move at all due to Valley fever problems

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sgn and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
[illegible]	9074 Telfair Av	D. M		10/22/12
ALBA MALIK	Sun Valley CA. 91352	D. M.		
Maria Gomez	9052 Telfair AV	M. G		10/23/12
Maria Gomez	Sun Valley CA 91352	M. G		
Lilia Plascencia	7217 Lemp Ave #3	LP		10/23/12
Lilia Plascencia	N. Hollywood CA 91605	LP		
Erick Plascencia	7217 Lemp Ave #3	EP		10/23/12
Erick Plascencia	N. Hollywood CA 91605	EP		
Lupita Zamora	7217 Lemp Ave #6	MZ		10/23/12
[illegible]	N. Hollywood CA 91605	MZ		
Leslie Zamora	7217 Lemp Ave #6	LZ		10/23/12
Leslie Zamora	N. Hollywood ca 91605	LZ		
Patricia Almanza	7217 Lemp Ave #6	PA		10/23/12
Patricia Almanza	N. Hollywood CA 91605			

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sign and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
Maria Luderso	11980 Allegheny St 206	M.L		10-22-12
Elizabeth Diaz	12032 Allegheny St 2	E.D		10-22-12
Emilia Menendez	11980 Allegheny ST APT 202	E.M		10-22-12
[signature]	9076 Telfair Ave	M.G.		10-22-12
Jose G. Gutierrez	9076 Telfair Ave	J.G		
Angel Soltero	11973 wicks st.	MASC.		10-22-12
Miguel Angel [illegible]	Sun Valley CA.			
Daniel Rivera	[signature] 9704 Vinegar	D.R.		
Carol Carlos	12001 Allegheny ST	C.C.		10/22
Norma A Reyes	9058 Telfair AV	N.R		10-22-12
Norma A Reyes	Sun Valley CA 91352			
Carmen M. Garcia	9070 telfair ave #65	C.M.G.		10-22-12
Carmen M. Garcia	Sun Valley cal. 91352			

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sgn and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
73587 1/2 Jason TORRES	pacoima CA	J.T.H		10-22-1
Roderick H Jones	12379 Sheldon St Sun Valley ca			10-22-2012
Janet M Jones	12379 Sheldon St Sun Valley, CA 91352			10-22-2012
Sergey Ghazunov	11965 Wicks St Sun Valley, CA 91352	S.G		10-22-2012
Margarita Gonzalez	11991 wicks st. Sun Valley ca. 91352	M G		10/22/12
Manuel Gonzalez	11991 Wicks st Sun Valley CA 91352	MG		10/22/12
Alexis Figueroa	11977 Wicks st Sun Valley CA 91352	AF	AF	10/22/12

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sgn and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
Amanda Fenilly	Sun Valley 12001 Allegheny #5	A.F		10/23/12
Amanda Fenilly	Sun Valley			
	12001 ALLEGHENY ST	E.L		10.23.12
EDDY	Sun Valley CA. 91352			
	12001 Allegheny st	R.V.		10-23-12
Ruben Gavilay	Sun Valley CA 91352			
Margarita Cardenas	12001 Allegheny St #2			
Margarita Cardenas	Sun Valley Calif 91352	M.C		10/23/12
	12001 Alleghenyst #22	N.G		10.23.12
Noe Granado	Sun Valley CA 91352			
	12001 Allegeny ST 22	T.G.M		10/23/12
TOMASA Granado	Sun Valley ca 91352			
	12001 Alleghenyst. #22	F.G		10/23/12
FLAVIO Granado	Sun Valley Ca 91352			

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sgn and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
[illegible] S.	12001 Allegheny			
Mercedes Sanchez	1201 Allegheny	M.S		10/23/12
[illegible]				
[illegible]	12001 Allegheny	A.P.		10/23/12
Alberto Pinto	S/VN Valley 91352			
José Hernandez				
12001 Allegheny St. #5	Sun Valley CA 91352	J.H.		10/23/12
12001 Allegheny St. #17	Sun Valley 91352	S.T		10-23-12
[illegible]				
[illegible]	12001 Allegheny St #17	GO		10-23-12
Gaby Dominguez	Sun Valley CA 91352			
Eri Rodriges	12001 Allegheny ST			10-23-12
Eri Rodriges		E R R		
Chloe Gomez	12001 Allegheny St Apt 7			
Chloe Gomez VMA	Sun Valley CA 91352	CG		10/23/2012

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sign and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
Magdalena [signature] MAGDALENA	8960 Telfair Ave Sun Valley Cal.	MH		10-12-12
David J Brown [signature] DAVID J. BROWN	8927 Telfair ave Sun Valley, Calif	DJB		10-22-12
Ann M Brown [signature] Ann M Brown	8927 Telfair Ave Sun Valley Ca	AMB		10-22-13
[signature] Heather Wade	11835 Peoria St. Sun Valley, CA 91352	AW		10-22-12
[signature] Jonathan Bermudez	11835 Peoria St. Sun Valley CA 91352	JB		10-22-12
Alma De los Santos [signature] Alma De Los Santos	11856 Peoria St. Sun Valley Ca. 91352	ADLS		10/22/12
MICHAEL NAKAMOTO M. Nakamoto [signature]	11869 PEORIA ST SUN VALLEY, CA 91352	[initials]		10/22/12

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sgn and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
Ramiro Garcia JR	10577 El Dorado Ave	R.G.J		10/21/12
Ramiro Garcia				
Eric Puente	13164 Desmond St	E.P		10/21/12
Eric Puente				
	Sun Valley, CA 91352			10-21-12
Christopher Sanchez	11961 Wicks St.	CS		
Melissa Sanchez	Sun Valley CA 91352			
Melissa Sanchez	11961 Wicks St	MS		10-21-12
Ruben Saltero	11973 Wicks St			10-22-12
Ruben Saltero C.	Sun Valley CA 91352	RSC		
	11970 Allegheny Ave	L.S		10-22-12
Lucia Salazar	Sun Valley CA 91352			
Claudia Salazar	11806 Snelling St	CS		10-22-12
Claudia Salazar	Sun Valley CA 91352			

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sign and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
MARTHA NAKAMOTO / Martha Nakamoto	11869 Peoria St Sun Valley CA 91352	MN		10-22-12
Yvonne Sanchez / Yvonne Sanchez	11875 Peoria St Sun Valley, CA 91352	YS		10-22-12
Stephanie Eshbach / STEPHANIE ESHBACH	11880 PEORIA ST SUN VALLEY CA 91352	SE		10-22-12
HECTOR ESPINOZA / [signature]	SUN VALLEY CA 91352 11902 Peoria ct Sun Valley	[initials]		10-22-12
Rigoberto Blanco / Rafael	11902 Peoria St. Sun Valley CA 91352	R.B		10-22-12
Michael A. Hathaway / Michael A. Hathaway	12016 Peoria St. Sun Valley, CA 91352	MAH		10-22-12
Laura Ceballos / [signature]	12059 Peoria St Sun Valley CA 91352	LC		10-22-12

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sgn and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
Jorge Valles	9710 Omelveny Pacoima CA 91331	JVI		10/22/12
Marco Cortez	8903 1/2 Laurel canyon Blvd Sun Valley CA 91352	MC		10.22.12
Ramiro Rosales	12343 Sheldon st Sun valley CA 91352	RR		10.22.12
Alejandra Vargas	8903 1/2 Laurel Canyon Blvd Sun Valley CA 91352	AV		10.22.12
Fernando Flores	8905 Laurel canyon Blv. Sun Valley	FF		10.22.12
Michael Iraheta	8905 Laurel canyon Sun Valley CA	MI		10.22.12
Jose Rivera	Simi valley	JR		10-22

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sgn and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
Eva Rico	12072 Peoria	EK		10-22-12
Eva Rico	St Sun Valley			
Victoria Gonzalez	12112 peoria st.	V.G.		10-22-2012.
Victoria Gonzalez	Sun Valley			
[illegible]	12126 PEORIA	HA		10-22-12
HILARIO AYALA	SUN VALLEY			
Adam MacMeyer	8127 Laurel Cyn Blvd	AM		10-22-12
ADAM MACMEYER	SUN VALLEY			
JUAN MENDOZA	1213 Wheelocks			
[illegible]	SUN VALLEY	J.M		10-22-12
Moises Perez	8893 Laurel cyn	MP		10/22/12
[illegible]				
Moises Perez Pedro Mercado	7300 Canby Av Reseda	P.M.		10/22/12

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sgn and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
SILVIA MEJIA	11969 Wicks St. Sun Valley	S.M		10/19/12
Gabby Sanchez	11961 Wicks St Sun Valley	G.S		10/20/12
Sandi Ayala	9066 Telfair ave Sunvalley CA 91352	S.A		10/20/2012
Dianne Gray	11965 Wicks St Sun Valley, CA 91352	D.G		10-21-12
Donna Martinez	11989 Wicks St. Sun Valley	D.M		10/21/12
ALEX J Ramirez	11757 Foothill St. Sun Valley 91352	A.J.R		10/21/12
Oscar Alegria	12042 Wicks St	O.A		10/27/12

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sgn and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
Silvia Rivera	11959 Art ST	SR		10-20-12
Silvia Rivera	Sun Valley CA			
Cecilia	Ian Kershin	CM		10-21-12
Cecilia Martinez				
Ann Pineda	11959 Art St	P.A		10-21-12
Ana Pineda	Sun Valley CA			
Alex Pineda	11959 Art St	PA		10-22-12
Alex pineda				
Jose Cabrera	12002 Allegheny	JC		10-20-12
	Sun Valley CA			
Teodoro R. Lopez		TL		10-20 12
Alisia S. Pita		AP		10 20 12
ROSARIO	PEREZ	RP		10/20/12
Rosario Perez	12002 allegheny Sun Valley 91352			

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sgn and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
Jennie Alvarez	8438 Bellingham	J.A		10.21.12
Jennie Alvarez	Sun Valley, Ca 91352	J.A		
Jose Reyes	8438 Bellingham ave	JR		10.21.12
	Sun Valley Ca 91352	JR		
Angel Gutierrez	Sun Valley Ca 91352	AG		10.21.12
Angel Gutierrez	8438 Bellingham ave.			
Flavia Reyes	8438 Bellingham ave.	F.R		10-21-12
Flavia Reyes	Sun Valley CA 91352			
Norma Reyes	11244 DORA ST.	N.R		10/21/12
Norma Reyes	Sun Valley CA-91352			
	11244 DORA ST	I.C.		10/21/12
IVAN CADENA	SUN VALLEY CA 91352	I.C.		
Elizabeth Vega	11957 Wicks St	E.V.		10/21/12
Elizabeth Vega	11957 Sun Valley CA 91352	E.V.		

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sgn and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
Ana B. Zaragoza	11979 Wicks st #27 Sun Valley CA 91352	A Z		10/20/12
Ana B. Zaragoza				10/20/12
Oziel Zaragoza	11979 wick st #27	OZ		10/20/12
Oziel Zaragoza	Sun Valley CA 91352	OZ		10/20/12
JULIAN VEGA	11959 WICKS ST	J.V		10-20-12
Julian Vega	SUN VALLEY CA 91352			
Jaime Flores	11981 wicks St	J. F		10-21-12
Jaime Flores	Sun Valley CA 91352	J. F		10-21-12
Jose Angus	3884 Belingham ST	J. S		10-21-12
	SUN Valley ca 91352			
Maria Reyes	3884 Belingham st	M R		10-21-12
Maria Reyes	Sun Valley ca 91352			
Evelyn Reyes	3884 Belingham st	E R		10-21-12
Reyes	Sun Valley CA 91352			

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sgn and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
Rodolfo Cruz	11980 Allegheny ST APT # 202			
Rodolfo Cruz	Sun Valley CA 91352	RC		10/21/12
Johnmar Molina	12050 Sheldon ct Apt 108	J.M		
Johnmar Molina	Sun valley CA 91352			10-21-12
Angelica Martinez	12002 Allegheny St	AM		10-21-12
Angelica Martinez	Apt 107			
Margarita Reballer	12002 Allegheny st #107			
Margarita Reballer	Sun Valley CA 91352	MR		10-21-12
Jorge Saucedo	11993 WICKS ST			
Jorge Saucedo	Sun Valley CA 91352	JS		10-21-12
Carmen Arita	12002 Allegheny st Apt 213			
Carmen Arita	Sun valley CA 91352	CA		10-21-12
[illegible]	12002 Allegheny St Apt 213	HE		
[illegible]	Sun Valley CA 91352			10-21-12

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sgn and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
[signature]	11995 wicks st.	LR		10-18-12
Lucrecia Renteria	Sun Valley CA. 91352			
[signature]	11995 wicks st.	R M		10-18-12
Rosa munoz	Sun Valley CA. 91352			
[signature]	11995 Wicks St.	J. M		10-18-12
Juan macias	Sun Valley CA. 91352			
[signature]	11993 wicks st.	[illegible]		10-19-12
Ally Chavez	Sun Valley CA. 91352	L&C		
[signature]	11995 Wicks ST			
Briseida Nava	Sun Valley CA 91352	BN		
[signature]	11971 Wicks ST	[signature]		10-20-2012
[redacted] PAUL W Allison	SUN VALLEY, CA 91352			
[signature]				
ABIGAIL MEDINA	7924 LAUREL CANYON N. HOLLYWOOD #6 CA	A. M		10-21-12

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sgn and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
Emilia Diaz	7802 Saint Claire av	E.D	E.D	10-19-12
Maria	7741 Vineland av. S.V.	M.G	M.G	10-19-12
Frances Gutierrez	9124 Telfair ave #7 S.V.	F.G.	F.G.	10-20-12
Fidel Morfin	9124 Telfair ave #5 S.V	FM	FM	10.20.12
Aurora Morales	9060 telfair av Sun Valley Cali Sun Val			
Aurora Morales	SunValley Ca 91352	A. M.		10-21-12
Daniel Morales / Daniel Morales	9060 TELFAIR SUN VALLEY 91352	D.M		10-21-12
DAVID MORALEZ		D.M		10-21-12
Sanjuana morales / SANJUANA MORALES	9060 TelFAIR	S. M.		

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sgn and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
Fermin Trujillo	8941 Oneida Ave	F. T.		10-21-12
Fermin Trujillo	Sun Valley CA 91352	M. T		
Mercedes Trujillo	8941 ONEIDA AVE.			10-21-12
MERCEDES TRUJILLO	SUN VALLEY, CA			
Sergio Amescua	8969 Oneida Ave	SA		10-21-12
Sergio Amescua	Sun Valley 91352			
Maria Amescua	8969 Oneida Ave	MA		10-21-12
Maria Amescua	Sun Valley CA 91352			
John Earle	JOHN EARLE			
JOHN EARLE	9009 ONEIDA AVE.	JE		10-21-12
Paula Solorzano	9009 Oneida Ave	PS		10-21-12
Frank Cardenas	9035 Oneida Ave	FC		10-21-12

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sgn and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
Luis [signature]	9054 Telfair ave Sun Valley 91352	LGL		10/20/12
Peregrina Peregrina	9054 Telfair ave Sun valley 91352	PP		10/20/12
[signature]	11983 Wicks St Sun Valley 91352	YM		10/20/12
Ana Flores Ana Flores	11981 Wicks St Sun Valley	AF AF		10-20-12
[signature]		T. M.		10-20-12
Ingrid Angiano	11989 Wicks	IA.		10-20-12,
Nathan Angiano	11989 Wicks St	NA		10-2012

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sgn and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
Arellano Victor Victor Arellano	8634 Laurel cyn Sun Valley 91352	V.M.A V.M.A.		10-20-12 " "
Maria Arellano	8634 Laurel cyn. sun Valley ca 91352	M.A M.A		10-20-12
[illegible] Aralia Moreno	8634 Laurel cyn Sun Valley Ca. 91352	A.M A.M.		10-20-12
Gamaliel Martinez Gamaliel Martinez	9054 Telfair ave sun Vally ca 91352	G M G M		10-20-12 10-20-12
Liber Morales Rubi Morales	11983 Wicks ST Sun Valley CA 91352	[illegible]		10-20-12
[illegible] Cecilia Pineda	11983 Wicks Sun Valley 91352	CP		10/20/12
[illegible] Brenda Rangel	11923 Wicks Sun Valley CA 91352	R.R BR		10/20/12

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sgn and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
Jesus Gonzalez	11991 Wicks St. Sun Valley 91352	JG		10-20-12
Esmeralda Silva	11963 Wicks st Sun Valley CA 91352	E.S		10/20/12
Angel Silva	11963 Wicks st Sun Valley CA 91352	A.S		10/20/12
Rocio Castro	11963 Wicks St. Sun Valley CA	RC		11/20/12
SERGIO CERVANTES		SC		10/20/12
Cristian Silva	11963 Wicks St. Sun Valley CA.	CS		10/20/12
Oscar Sanchez	11961 Wicks St Sun Valley CA	OS		10-20-12

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sgn and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
Elizabeth Ramirez	9056 Telfair Ave.	E. R.		10/20/12
Elizabeth Ramirez	Sun Valley CA 91352			
Jorge Ramirez	9056 Telfair Ave	J. R.		10-20-12
Jorge Ramirez	Sun Valley			
Manuel Sánchez	9056 Telfair Ave	M. S.		10-20-12
Manuel Sánchez	Sun Valley CA	M. S.		
Saul Ramirez	9056 Telfair Ave	S. R.		10-20-12
Saul Ramirez	Sun Valley CA			
VIRGINIA CRUZ		V. C.		10/20/12
VIRGINIA CRUZ				
[illegible]	9054 Telfair ave	G. C.		10/20/12
[illegible]	Sun Valley 91352			10/20/12
[illegible]	9054 TELFAIR AVE	CC		10-20-12
Eduardo Baeza	11977 Wicks	ED		10-20-12
Eduardo Baeza	Sun Valley ca 91352			

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sgn and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
Angel MASC.	11973 wicks st. Sun Valley CA.	MASC.		10-20-12
Margaret Torres	11959 Art st Sun valley CA 91352	M T M T		10/20/12 10/20/12
Juana Molina	11959 Art ST Sun Valley CA 9135	J M J M		10/20/12 10/20/12
Elizabeth Molina	11959 Art st sun valley 91352	E M E M		10-20-12
ASHARVI BORESOFF	11959 ART. ST SUN VALLEY 91352	A.B		10/20/12
LILIA BORESOFF	11959 ART. ST SUN VALLEY 91352	L.B		10/20/12
Maria Ramirez	11959 Art ST Sun Valley CA 9135	M.R M R		10/20/12 10/20/12

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sgn and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
[signature]	7634 W. Via Corona Montebello CA 90640	E.J.		10/19/12
[signature]	3826 S. Grand L.A., CA 90037	JM		10/19/12
Enlsa Sanchez	11961 Wicks St Sun Valley, CA 91352	ES		10-19-12
Rosalinda Vega	11959 Wicks St Sun Valley CA 91352	R.V		10-19-12
Mayra Espinoza	11975 wicks st.	m.E.		10/19/12
Robert Morford	11975 Wicks St	RS		10/19/2012
Mayra Espinoza	11975 wicks st Sun Valley CA 91352	m.E		10/19/12
Robert Morford	11975 Wicks St Sun Valley CA 91352	RS		10/19/2012

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sgn and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
Cynthia J. Padilla	12042 Wicks St. Sun Valley	C.J.P		10/19/12
Margella Zamudio	12081 Wicks St Sun Valley Ca 91352	MZ		10-19-12
Max Ceman	12081 Wicks St Sun Valley, CA 91352	MC		10/19/12
Maria Barroya	8265 Craner Ave Sun Valley, CA 91352	MB		10/19/12
Jennifer Salazar	12001 Art Street Sun Valley, CA 91352	JS		10/19/12
Maite Rodriguez	12021 Art Street Sun Valley, CA 91352	MR		10/19/12
Emilio Saenz	569 S. Keenan Ave Los Angeles Ca. 90022	E.S		10/19/12

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sgn and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
[signature]	9120 TELFAIR AVE # 17	O.S		10/18/12
OSCAR SANCHEZ	SUN VALLEY CA			
[signature]	9120 Telfair #17	J.S		10.18.12
Jose G Sanchez	-Sun Valley			
[signature]	9120 Telfair #17	M.S		10-19-12
Maxia Sánchez	SUN Valley			
[signature]	11907 Wicks St.	[signature]		10/19/12
Victoria Mia	Sun Valley			
Cindy Alegria	12042 Wicks st	C.A		10-19-12
[signature]	Sun Valley			
Julia Cardenas	12042 wicks st	J.C		10/19
Julia Cardenas	Sun Valley ca 91352			
Plutarco Padilla	12042 wicks st	P.P.		10/19
[signature]	Sun Valley 91352			

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sgn and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
Daniel Chau	11960 Wicks Street	DTC		10/18/12
	Sun Valley, CA 91352			
Kevin Chau	11960 Wicks Street	KTC		10/18/12
	Sun Valley CA 91352			
Victor Carmona	9124 Telfair Ave	VC		10/18/12
Victor Carmona	#9 Sun Valley CA 91352	VC		
Gloria Carmona	9124 Telfair Ave	GC		10/18/12
Gloria Carmona	#9 Sun Valley CA 91352			
Manuel S	9120 Telfair Ave #15	MS		10/18/12
Manuel A Sanchez	Sun Valley CA 91352			
Miriam Sanchez	9120 Telfair Ave #15	MS		10/18/12
Miriam Sanchez	Sun Valley CA 91352			
Angelica Sanchez	9120 Telfair A #15	AS		10/18/12
Angelica Sanchez	Sun Valley ca 91352			

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sgn and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
TANIA CARRILLO	12021 allegheny St #14	T. C		10-18-12
Tania Carrillo	Sun Valley CA			
Patricia Ruiz	12021 allegheny St#14	TC		10-18-12
Patricia Ruiz	Sun Valley			
Maria Pantoja	12021 Allegheny st #8	MP		10-18-12
	Sun Valley CA			
FANG ROU CHI	11954 WICKS ST	FC		10-18-12
FANG ROU CHI	SUN VALLEY, CA 91352			
John C. Lam	11954 WICKS ST.	J.C.L.		10/18/12
JOHN C. LAM	SUN VALLEY. CA. 91352.			
VAN CHAU	11960 WICKS ST			
Van Chau	SUN VALLEY CA 91352	VKC		10/18/12
JANNIE LAM	11960 WICKS ST.	JL		10/18/12
Jannie Lam	SUN VALLEY, CA 91352			

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sign and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
Elvia Gutierrez	12021 Allegheny St	E.G		10-18-12
[illegible]	Sun Valley CA			
Iraly Camarena	12021 Allegheny St Apt 3	I C		10-18-12
Iraly Camarena	Sun Valley CA			
Josefina V.	12021 Allegny St Apt 1	J.V		10/18/12
Josefina V.	12021 Allegheny St Sun Valley			
Deborah Lewis	12021 Allegheny St #28 Sun Valley	DL		10-18-12
Jessie Lewis	12021 Allegheny St #28 Sun Valley	J.L.		10-18-12
Reyna Palapa	12021 Allegheny St #24	R P		10-18-12
Reyna Palapa	Sun Valley CA			
Gregorio Quinteros	12021 allegheny st Sun Valley CA 91352	G-Q		10-18-12
[illegible]				
Maria Carrillo	12021 Allegheny St	M C		10-18-12
Maria Carrillo	Sun Valley CA			

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sign and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
Francisco Perez	9148 Telfair Aven	F.P		10-18-12
Francisco Perez	Sun Valley ca 91352			
Azucena Gervacio	12021 Allegheny St #25	AG		10-18-12
Azucena Gervacio	Sun Valley, CA 91352			
ROSA GERVACIO	12021 Allegheny St 25	RG		10-18-12
ROSA GERVACIO	Sun Valley, CA 91352			
[illegible]	12021 Allegheny St #21	LEA		10-18-12
[illegible]	SUN VALLEY CA 91352			
[illegible]				
[illegible]	12021 Allegheny St #21	MCS		10-18-12
Maria Saldana	Sun Valley CA 91352			
[illegible]	12021 Allegheny St #21	C.S.B		
Claudia Saldana	Sun Valley CA 91352			
Jessenia Vargas	12021 Allegheny St #17			
[illegible]	Sun Valley, Cal 91352	SV		10/18/12

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sign and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
Sandra Castillo	9101 Telfair Ave	S.C		10-18-12
Sandra Castillo	Sun Valley CA 91352			
Elizabeth Mendoza	12100 Sheldon st	E.M		10-18-12
Elizabeth Mendoza	Sun Valley CA 91352			
Vanessa Tovares	2100 Sheldon st Sun Valley	VT		10-18-12
V. Tovares				
Jorge Rodriguez	12021 Allegheny st #30	JR		10-18-12
	Sun Valley CA 91352			
Mayra Rivera	12030 Sheldon st Apt 10	MR		10-18-12
Mayra Rivera	Sun Valley CA 91352			
Esperanza Saavedra	12030 Sheldon st Apt 10	ES		10-18-12
Esperanza Saavedra	Sun Valley CA 91352			
Ricky Bravo	9144 Telfair ave	RB		10-18-12
Ricky Bravo	Sun valley ca 91352			

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Sign and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
Rosa R. Rosa ROSA A. ADONA	9038 Telfair Ave. Sun Valley	RA		10-18-12
Judy Reyes Judy Reyes	12022 Wicks St S.V	X		10/18/12
	9064 Telfair Ave. Sun Valley	GM		10/18/12
Hortencia Marcos Hortencia Marcos	9064 Telfair Ave. Sunvalley CA	HM		10/18/12
Victor Barrios Victor Barrios	9064 Telfair Ave Sun Valley CA	VB		10/18/12
William Ivanera William Ivanera	11752 Wicks St. Sun Valley, CA,	W.I		10-18-12
G Gilberto garcia Gilberto Garcia	9130 Telfair Ave. CA Sunvalley 91352	GG		10-18-12

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Sign and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
[signature]	9124 Telfair Ave #C	M.B.		10-18-12
Mariana Bocanegra	Sun Valley, CA 91352			
[signature]	9130 telfair ave #1	H.I.C.G		10-18-12
[signature]				
Michael Hill	9138 Telfair Ave	M.H.		10-18-12
[signature]	Sun Valley 91352			
Maria Martinez	1100 telfair ave	MM		10-18-12
[signature]	Sun Valley Ca 91352			
Guillermina Martinez	9158 Telfair ave #2			
[signature]	Sun Valley CA. 91352	GM.		10/18/12
Ana Torres	9100 telfair Ave	AT		10/18/12
[signature]				
Maria Hernandez	11116 LORNE st #142	M R		10/18/12
maria Hernandez	SUN VALLEY CA 91352			

PETITION TO OPPOSE DIESEL EMISSIONS PROCESS OF THE LADWP TUJUNGA SPREADING GROUNDS ENHACEMENT PROJECT

Sign and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
Maria Elena Cervantes	11953 Wicks st #13 Sun Valley	M.E.C.		10-18-12
Maria Elena Cervantes				
Julio A.		JA		10/18/12
Julio Avila	9066 Telfair Av	J		
Walter Granado	9074 Telfair Av	WG		10/18/12
Walter Granado				
Andrea Vasquez	9074 Telfair Av	AV		
Andrea Vasquez				
Eva Correa	9034 Telfair ave	CC		10-18-12
	S			
MARGARET CORREA	9034 Telfair ave	MC.		10-18-12.
Margaret Correa				
	9028 TELFAIR AVE.	JA		10-18-12
GERARDO ADINA	SUN VALLEY CA 91352			

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Sign and Print Name	Home Address	In Favor of Conveyor belt System (Your Initial)	In Favor of CNG/LNG Trucks Only (Your Initial)	Date
Arcelia Lopez	11977 Wicks St.	a.l.		10/16/12
Arcelia Lopez	Sun Valley, CA 91352			
Alonso Figueroa	11977 WICKS ST.	A.F.		10/16/12
Alonso Figueroa	SUN VALLEY CA 91352			
Rey Martinez	9070 Telfair Ave	RM		
Rey Martinez	Sun Valley Ca. 91352			
Juana Sanchez	11955 wicks st.	js.		10/17/12
	Sun Valley CA. 91352			
CRISTA B. CAGAN	9024 Telfair Ave	CB		10/17/12
	Sun Valley 91352			
Julio Villalobos	9047 TELFAIR AVE	J.V.		10-17-12
Julio Villalobos	SUN VALLEY Calif 91352			
Lynn Villalobos	9047 TELFAIR AVE			
	SUN Valley CA 91352			10-17-12

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