

Final

CITY OF BEVERLY HILLS  
LA BREA SUBAREA WELL AND TRANSMISSION MAIN  
PROJECT

Initial Study/Mitigated Negative Declaration  
State Clearinghouse No. 2019099076

Prepared for  
City of Beverly Hills

November 2019





Final

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Prepared for  
City of Beverly Hills

November 2019

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# TABLE OF CONTENTS

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## City of Beverly Hills, La Brea Subarea Well and Transmission Main Project Final IS/MND

	<u>Page</u>
<b>Chapter 1. Introduction to Response to Comments</b> .....	<b>1-1</b>
1.1 CEQA Requirements .....	1-1
1.2 CEQA Process .....	1-2
1.3 Evaluation and Response to Comments .....	1-2
1.4 Final IS/MND Certification and Approval .....	1-2
1.5 Notice of Determination .....	1-2
<b>Chapter 2. Comment Letters</b> .....	<b>2-1</b>
<b>Chapter 3. Responses to Comments</b> .....	<b>3-1</b>
Letter 1: State Clearinghouse, Office of Planning and Research .....	3-1
Letter 2: California Department of Transportation (CalTrans), District 7 .....	3-1
Letter 3: Los Angeles County Metropolitan Transportation Authority (Metro) .....	3-3
Letter 4: South Coast Air Quality Management District (SCAQMD).....	3-7
Letter 5: Call Log .....	3-8
<b>Chapter 4. Corrections and Additions to the Draft IS/MND</b> .....	<b>4-1</b>
<b>Chapter 5. Mitigation Monitoring and Reporting Program</b> .....	<b>5-1</b>
CEQA Requirements.....	5-1
 <b>List of Tables</b>	
2-1 Comment Letters Received .....	2-1
5-1 Mitigation Monitoring and Reporting Program for the La Brea Subarea Well and Transmission Main Project .....	5-2

# CHAPTER 1

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## Introduction to Response to Comments

This Final Initial Study/Mitigated Negative Declaration (Final IS/MND) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code Section 21000 et seq.) and *CEQA Guidelines* (California Code of Regulations Section 15000 et seq.). The Final IS/MND incorporates, by reference, the Draft IS/MND (State Clearinghouse No. 2019099076) prepared by the City of Beverly Hills (City) for the La Brea Subarea Well and Transmission Main Project (proposed project), as it was originally published and the following chapters, which include revisions made to the Draft IS/MND.

### 1.1 CEQA Requirements

Before the City may approve the project, it must certify that the Final IS/MND: a) has been completed in compliance with CEQA; b) was presented to the City Council who reviewed and considered it prior to approving the project; and c) reflects the City's independent judgment and analysis.

A Final IS/MND shall consist of the following:

- The Draft IS/MND or a revision of that draft;
- Comments and recommendations received on the Draft IS/MND;
- A list of persons, organizations, and public agencies commenting on the Draft IS/MND;
- The response of the Lead Agency to significant environmental points raised in the review and consultation process; and
- Any other information added by the Lead Agency.

This Final IS/MND for the proposed project presents Chapter 1 through Chapter 4:

- Chapter 1: Introduction and CEQA process
- Chapter 2: A list of persons, organizations, and public agencies commenting on the Draft IS/MND, and the written comments received on the Draft IS/MND
- Chapter 3: Written responses to each comment identified in Chapter 2
- Chapter 4: Mitigation Monitoring and Reporting Program

## 1.2 CEQA Process

### Public Participation Process

#### Notice of Intent

The Notice of Intent (NOI) to adopt an IS/MND was posted on September 23, 2019 with the County Clerk in Los Angeles. The Draft IS/MND was circulated for a 30-day public review until October 23, 2019. The Draft IS/MND was circulated to federal, State, and local agencies and interested parties requesting a copy of the Draft IS/MND. Copies of the Draft IS/MND were made available to the public at the following locations:

- City of Beverly Hills Web Site: <http://www.beverlyhills.org/lcwell>
- Beverly Hills Public Library, 444 N. Rexford Drive, Beverly Hills, CA 90210;
- Beverly Hills Public Works Building, 345 Foothill Road, Beverly Hills, CA 90210
- Palms-Ranch Park Branch Library, 2920 Overland Avenue, Los Angeles, CA, 90064
- Fairfax Branch Library, 161 S. Gardner Street, Los Angeles, CA, 90036; and
- Robertson Branch Library, 1719 S. Robertson Boulevard, Los Angeles, CA, 90035.

## 1.3 Evaluation and Response to Comments

The City, as the Lead Agency, will evaluate comments on environmental issues received from parties that have reviewed the Draft IS/MND and, although not required to do so, intends to prepare written responses.

## 1.4 Final IS/MND Certification and Approval

Prior to considering the project for approval, the City, as the Lead Agency, will review and consider the information presented in the Final IS/MND and will certify that the Final IS/MND:

- (a) Has been completed in compliance with CEQA;
- (b) Has been presented to the City Council as the decision-making body for the Lead Agency, which reviewed and considered it prior to approving the project; and
- (c) Reflects the City's independent judgment and analysis.

## 1.5 Notice of Determination

Pursuant to Section 15094 of the *CEQA Guidelines*, the City will file a Notice of Determination (NOD) with the Office of Planning and Research and Los Angeles County Clerk within five working days of project approval.

# CHAPTER 2

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## Comment Letters

The Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the La Brea Subarea Well and Transmission Main Project (proposed project) was circulated for public review for 30 days (September 23, 2019 through October 23, 2019) in accordance with the requirements of *CEQA*. The City received four comment letters and six verbal comments (over the phone) during the public review period, which are listed in **Table 2-1** and included within this chapter. The letters have been marked with brackets that delineate comments pertaining to environmental issues and the information and analysis contained in the Draft IS/MND. Responses to such comments are provided in Chapter 3.

**TABLE 2-1  
COMMENT LETTERS RECEIVED**

Comment No.	Commenting Agency	Date of Comment
1	State Clearinghouse, Office of Planning and Research	October 23, 2019
2	California Department of Transportation (CalTrans), District 7	October 22, 2019
3	Los Angeles County Metropolitan Transportation Authority (Metro)	October 22, 2019
4	South Coast Air Quality Management District (SCAQMD)	October 22, 2019
5	Call Log <ul style="list-style-type: none"> <li>• Kimberly Terry</li> <li>• Sheryl</li> <li>• Lori Laboy</li> <li>• Norman Zafman</li> <li>• Sylvia Ashly</li> <li>• Fatima Choudury (Caltrans)</li> </ul>	Various September 24, 2019 through October 22, 2019





Gavin Newsom  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Kate Gordon  
Director

October 23, 2019

Tristan Malabanan  
Beverly Hills, City of  
345 Foothill Road  
Beverly Hills, CA 90210

Subject: La Brea Subarea Well and Transmission Main Project  
SCH#: 2019099076

Dear Tristan Malabanan:

The State Clearinghouse submitted the above named MND to selected state agencies for review. The review period closed on 10/22/2019, and the comments from the responding agency (ies) is (are) available on the CEQA database for your retrieval and use. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

“A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation.”

**Check the CEQA database for submitted comments for use in preparing your final environmental document: <https://ceqanet.opr.ca.gov/2019099076/2> . Should you need more information or clarification of the comments, we recommend that you contact the commenting agency directly.**

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

cc: Resources Agency

1-A

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7 – Office of Regional Planning  
100 S. MAIN STREET, MS 16  
LOS ANGELES, CA 90012  
PHONE (213) 897-0475  
FAX (213) 897-1337  
TTY 711  
www.dot.ca.gov



*Making Conservation  
a California Way of Life.*

Governor's Office of Planning & Research

**OCT 22 2019**

**STATE CLEARINGHOUSE**

October 22, 2019

Tristan Malabanan  
City of Beverly Hills  
345 Foothill Road  
Beverly Hills, CA 90210

RE: La Brea Subarea Well and Transmission  
Main Project – Mitigated Negative  
Declaration (MND)  
SCH # 2019099076  
GTS # 07-LA-2019-02840  
Vic. LA-10/PM: R8.831  
LA-187/PM: 8.648

Dear Tristan Malabanan:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced MND. The proposed project would include the construction of a groundwater production well in the La Brea Subarea (that would provide approximately 1,700 AFY of new water supply), the rehabilitation of an existing (inactive) 18 and 24-inch pipelines, and the connection of the rehabilitated pipeline to a newly constructed raw water transmission main with a diameter of 16-inches (collectively, referred to herein as "proposed transmission main"). The proposed transmission main would connect the proposed production well to the existing Foothill Water Treatment Plant (WTP) for treatment and supply. The pipelines would be sized to accommodate 3,000 gallons per minute (gpm), which would be from the currently proposed well and potentially other wells in the area. The City of Beverly Hills is the Lead Agency under the California Environmental Quality Act (CEQA).

2-A

The nearest State facilities to the proposed project are Interstate 10 (I-10) and State Route 187 (SR-187). Specifically, the project is located approximately 2,000 feet from the I-10 & SR-187 interchange near S La Cienega Boulevard.

2-B

From reviewing the MND, Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities.

The following information is for your consideration.

Caltrans appreciates the efforts of this project to minimize construction traffic, such as by conducting nighttime construction of the transmission main. If construction traffic is expected to cause delays on any State facilities, please submit the Traffic Control Plan detailing these delays, as well as information on a Truck Haul Route Program, for Caltrans' review. In addition, strategies should be identified in the Traffic Control Plan to ensure that truck deliveries during project design and construction are conducted in an efficient manner that does not cause transportation conflicts with other vehicles, pedestrians, or bicyclists.

2-C

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods to minimize congestion and

Tristan Malabanan  
October 22, 2019  
Page 2 of 2


ensure maximum safety conditions for pedestrians, cyclists, and motorists.

Also, Senate Bill 743 (2013) mandates that VMT be used as the primary metric in identifying transportation impacts of all future development projects under CEQA, starting July 1, 2020. For information on determining transportation impacts in terms of VMT on the State Highway System, see the Technical Advisory on Evaluating Transportation Impacts in CEQA by the California Governor's Office of Planning and Research, dated December 2018: [http://opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf).

Finally, storm-water runoff is a sensitive issue for Los Angeles County and needs to be considered during project design.

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at [Emily.Gibson@dot.ca.gov](mailto:Emily.Gibson@dot.ca.gov), and refer to GTS # 07-LA-2019-02840.

Sincerely,



MIYA EDMONSON  
IGR/CEQA Branch Chief  
cc: Scott Morgan, State Clearinghouse

↑  
2-C  
↓



Los Angeles County  
Metropolitan Transportation Authority

One Gateway Plaza  
Los Angeles, CA 90012-2952

213.922.2000 Tel  
metro.net

October 22, 2019

Tristan Malabanan, P.E., Project Manager  
Department of Public Works, Engineering Division  
City of Beverly Hills  
345 Foothill Road  
Beverly Hills, CA 90210  
Sent by Email: askpw@beverlyhills.org

RE: La Brea Subarea Well and Transmission Main Project:  
Mitigated Negative Declaration (MND)

Dear Mr. Malabanan:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed La Brea Subarea Well and Transmission Main Project (Project) in the City of Beverly Hills (City). Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive developments to grow ridership, reduce driving, and promote walkable neighborhoods.

The purpose of this letter is to outline recommendations from Metro concerning issues that are germane to our agency's statutory responsibility in relation to the Metro Purple Line Extension Section One and Two and Metro bus facilities and services, which may be affected by the proposed Project. In addition to the specific comments outlined below, Metro would like to provide the City with two resources: 1) the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro-owned right-of-way (ROW) and 2) the Adjacent Construction Manual with technical information (also attached). These documents and additional resources are available at [www.metro.net/projects/devreview/](http://www.metro.net/projects/devreview/).

3-A

**Project Description**

The Project is adjacent to Metro bus service and the Purple Line Extension under construction, and includes construction of a groundwater production well in the La Brea Subarea, the rehabilitation of existing (inactive) 18- and 24- inch pipelines, and the connection of the rehabilitated pipelines to a newly constructed raw water transmission main with a diameter of 16 inches.

The proposed Well Site would be implemented on a Beverly Hills-owned property located at 1956 Chariton Street. The proposed transmission main in its entirety would be approximately four miles long. The proposed rehabilitation area of the transmission main would proceed north within La Cienega Boulevard to Olympic Boulevard, then west through the Frank Fenton Field at La Cienega Park. The alignment in Beverly Hills will continue north on Le Doux Road, then west on Clifton Way to connect to the proposed 16-inch new pipeline. The length of the proposed new 16-inch transmission main would then continue westward until turning north on North Swall Drive, then west on Dayton

3-B

La Brea Subarea Well and Transmission Main Project  
MND – Metro Comments  
October 23, 2019

Way, until turning north on North Palm Drive, then continue westward on 3<sup>rd</sup> street, and finally through the City yard to connect to the utilities inlet side of the Foothill Water Treatment Plant (WTP).

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3-B

**Comments**

*Bus Stop Adjacency*

1. Service: Metro Bus Line 105 operates on La Cienega Boulevard, adjacent to the Project. One Metro Bus stop is in proximity to the Project at La Cienega and Guthrie Avenue. Other transit operators may provide service in this area and should be consulted.
2. Impact Analysis: The MND should analyze potential effects on Metro Bus service and identify mitigation measures or project design features as appropriate. Potential impacts may include construction traffic, operation of and shipment/deliveries to the completed Project, and temporary or permanent bus service rerouting.
3. Bus Operations Contacts: Please contact Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro’s Stops and Zones Department at 213-922-5190 with any questions and at least 30 days in advance of initiating construction activities. Other municipal bus services may also be impacted and should be included in construction outreach efforts.

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3-C

*Subway Adjacency*

1. Operations: The Metro Westside Purple Line Extension Section One and Two are currently under construction in the vicinity of the Project. Once in operation, peak service as often as ten minutes in both directions. Trains may operate in and out of revenue service, 24 hours a day, seven days a week in the tunnels adjacent to the Project.
2. Impact Analysis: Due to the Project’s proximity to the Purple Line tunnel intersecting at Wilshire Boulevard and North Le Doux Road, the City is encouraged to contact Metro staff early in the design process to plan for potential impacts. The MND should analyze potential effects on subway construction and identify mitigation measures or project design features as appropriate. Metro recommends that the following provisions be used to develop a mitigation measure and/or project design feature that addresses these potential impacts:
  - a. Haul Route: The construction of the Project may impact haul routes on La Cienega Boulevard for the Purple Line Extension Two (i.e. lane closures) that have been approved by both the City of Beverly Hills and the City of Los Angeles. Metro would appreciate assistance in coordinating any modifications to the haul route necessitated by the Project.
  - b. Technical Review: The City shall require its construction contractor to shall submit site plans, engineering drawings and calculations, as well as construction work plans and methods, including any crane placement and radius, to evaluate any impacts to the Metro Purple Line infrastructure in relationship to the Project. The City shall ensure that its construction contractor will obtain Metro’s approval of final construction drawings before commencement of any construction activities for the Project.

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3-D  
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La Brea Subarea Well and Transmission Main Project  
MND – Metro Comments  
October 23, 2019

- c. Construction Safety: The construction and operation of the Project shall not disrupt the construction activities of the Metro Purple Line or the structural and systems integrity of Metro's tunnels. Not less than two months before commencement of construction activities, the City's construction contractor shall initiate with Metro Purple Line construction staff. During Project construction the City's construction contractor shall work in close coordination with Metro to ensure that structural integrity is not compromised by construction activities or permanent build conditions. The City's construction contractor shall permit Metro staff to monitor construction activities to ascertain any impact to the Purple Line.

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3-D

If you have any questions regarding this response, please contact me by phone at 213-922-2671, by email at [LingS@metro.net](mailto:LingS@metro.net), or by mail at the following address:

3-E

Metro Development Review  
One Gateway Plaza MS 99-22-1  
Los Angeles, CA 90012-2952

Sincerely,



Shine Ling, AICP  
Manager, Transit Oriented Communities

Attachments and links:

- Adjacent Construction Design Manual
- Adjacent Development Handbook: <https://www.metro.net/projects/devreview/>



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
 (909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

October 22, 2019

[askpw@beverlyhills.org](mailto:askpw@beverlyhills.org)

Tristan Malabanan, P.E., Project Manager  
 City of Beverly Hills, Department of Public Works  
 Engineering Division  
 345 Foothill Road  
 Beverly Hills, California 90210

## Mitigated Negative Declaration (MND) for the Proposed La Brea Subarea Well and Transmission Project

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final MND.

### South Coast AQMD Staff’s Summary of Project Description

The Lead Agency proposes to demolish an existing structure and rehabilitate an existing 10,250 linear feet of water pipelines ranging in diameter from 18 inches to 24 inches (Proposed Project). The Proposed Project will also include construction of a four-mile water pipeline 16 inches in diameter and a 700-gallon-per-minute water well. The Proposed Project is located along Burton Way, Le Doux Road, and La Cienega Boulevard from the northeast corner of Chariton Street and Guthrie Avenue in the City of Los Angeles to the northeast corner of La Cienega Boulevard and Cadillac Avenue in the City of Beverly Hills. Construction of the Proposed Project is anticipated to take up to 13 months, becoming operational in Winter of 2020<sup>1</sup>. The well equipping (grading<sup>2</sup>) and the rehabilitation/transmissions main installation (building construction<sup>3</sup>) construction phases are estimated to take seven and eight months to complete, respectively<sup>4</sup>, and construction activities from both phases will occur adjacent to existing sensitive receptors<sup>5</sup>.

4-A

### South Coast AQMD Staff’s Summary of the Air Quality Analysis

In the Air Quality Analysis Section, the Lead Agency quantified the Proposed Project’s construction and operational emissions and compared those emissions to South Coast AQMD’s recommended regional and localized air quality CEQA significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project’s regional construction and operational impacts would be less than significant<sup>6</sup>. Based on the localized air quality analysis, the Lead Agency found that the Proposed Project would result in localized PM2.5 emissions at 2.9 pounds per day (lbs/day)<sup>7</sup>, which did not exceed South Coast AQMD’s localized air quality CEQA significance threshold for PM2.5 at 3 lbs/day. As such, no air quality mitigation was included<sup>8</sup>.

4-B

<sup>1</sup> MND. Section 2.0 Project Description. Page 12.

<sup>2</sup> MND. Appendix A: Air Quality, Greenhouse Gas, and Energy Information. CalEEMod Summer Run. PDF page 42.

<sup>3</sup> *Ibid.*

<sup>4</sup> MND. Section 2.0 Project Description. Page 12.

<sup>5</sup> MND. Section 4.3 Air Quality. Pages 33 through 36.

<sup>6</sup> *Ibid.* Pages 28 through 37.

<sup>7</sup> *Ibid.*

<sup>8</sup> *Ibid.*



Recommended Mitigation Measure for Localized Air Quality Impacts from Construction

While the Proposed Project’s localized PM2.5 construction emissions (i.e., approximately 2.9 lbs/day) did not exceed South Coast AQMD’s localized air quality CEQA significance threshold for PM2.5 at 3 lbs/day for one acre with sensitive receptors at 25 meters in Source Receptor Area 2 (Northwest Coastal LA County), they were slightly below the applicable significance threshold. Therefore, to further reduce PM2.5 emissions during construction and to ensure that nearby sensitive receptors are not adversely affected by the emissions from the use of off-road diesel-powered construction equipment that will occur adjacent to sensitive receptors, South Coast AQMD staff recommends that the Lead Agency incorporate the following mitigation measure into the Final MND.

*Tier 4 Construction Equipment or Level 3 Diesel-Particulate Filters*

To further reduce PM2.5 emissions during construction and minimize their impacts on nearby residents, South Coast AQMD staff recommends that the Lead Agency require the use of off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (USEPA) Tier 4 Final off-road emissions standards for equipment rated at 50 horsepower or greater during construction of the Proposed Project. Such equipment will be outfitted with Best Available Control Technology (BACT) devices including a CARB certified Level 3 Diesel Particulate Filter (DPFs). Level 3 DPFs are capable of achieving at least 85 percent reduction in particulate matter emissions<sup>9</sup>. A list of CARB verified DPFs are available on the CARB website<sup>10</sup>.

To ensure that Tier 4 Final construction equipment or better would be used during the Proposed Project’s construction, South Coast AQMD staff recommends that the Lead Agency include this requirement in applicable bid documents, purchase orders, and contracts. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. A copy of each unit’s certified tier specification or model year specification and CARB or South Coast AQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. Additionally, the Lead Agency should require periodic reporting and provision of written construction documents by construction contractor(s) to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance.

In the event that construction equipment cannot meet the Tier 4 Final engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim or Tier 3 emission standards, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project, and/or limiting construction phases occurring simultaneously.

Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, responses should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful,

<sup>9</sup> CARB. November 16-17, 2004. *Diesel Off-Road Equipment Measure – Workshop*. Page 17. Accessed at: [https://www.arb.ca.gov/msprog/ordiesel/presentations/nov16-04\\_workshop.pdf](https://www.arb.ca.gov/msprog/ordiesel/presentations/nov16-04_workshop.pdf).

<sup>10</sup> *Ibid*. Page 18.

4-C

4-D



informative, or useful to decision makers and the public who are interested in the Proposed Project. Further, when the Lead Agency makes the finding that the additional recommended mitigation measure is not feasible, the Lead Agency should describe the specific reasons for rejecting them in the Final EIR (CEQA Guidelines Section 15091).

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4-D

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at [amullins@aqmd.gov](mailto:amullins@aqmd.gov) or (909) 396-2402, should you have any questions.

↑  
4-E

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.  
Program Supervisor, CEQA IGR  
Planning, Rule Development & Area Sources

LS:AM  
LAC190924-04  
Control Number

Date	Name	Questions/Comments
9/24/2019	Kimberly Terry	<ul style="list-style-type: none"> <li>• Why not put the line on Robertson? Where is all the traffic going to go?</li> <li>• Is Beverly Hills allowed to take water from LA?</li> <li>• Is LA okay with that?</li> </ul>
9/24/2019	Sheryl	<ul style="list-style-type: none"> <li>• Where is the existing pipe on La Cienega?</li> <li>• What's the timing of construction?</li> </ul>
9/26/2019	Lori Laboy	<ul style="list-style-type: none"> <li>• Why are you replacing an 18 to 24" line with a 16" line?</li> <li>• How long will the construction take and when will it start?</li> </ul>
10/2/2019	Norman Zafman	<ul style="list-style-type: none"> <li>• Expressed concerns about pipeline on Le Doux between Gregory &amp; Charleville.</li> </ul>
10/22/2019	Sylvia Ashly	<ul style="list-style-type: none"> <li>• Concerned about chemicals &amp; chemical treatment.</li> <li>• Against of chemical treatment and potential pollutants at that site.</li> </ul>
10/22/2019	Fatima Choudury (Caltrans)	<ul style="list-style-type: none"> <li>• Concerned because the map shows a blue dot near the onramp of the freeway.</li> </ul>

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## CHAPTER 3

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# Responses to Comments

A summary of the comments contained within the comment letters received during the public review period for the Draft Initial Study/Mitigated Negative Declaration (IS/MND) is included in this section (see Chapter 2). The City provides individual responses to the bracketed comments in each letter. Where the responses indicate additions or deletions to the text of the Draft IS/MND, additions are indicated in underline and deletions in ~~strikeout~~.

### **Letter 1: State Clearinghouse, Office of Planning and Research**

#### Comment 1-A

The comment acknowledges the State Clearinghouse distributed the IS/MND as required under CEQA to pertinent agencies. The Caltrans comment letter is attached.

#### Response 1-A

The comment is noted and saved in the project record. No response is required because there are no specific comments on the contents in the Draft IS/MND. The Caltrans letter is responded to as Letter 2 below.

### **Letter 2: California Department of Transportation (Caltrans), District 7**

#### Comment 2-A

The comment acknowledges receipt of the Draft IS/MND and reiterates the project description.

#### Response 2-A

No response is required because there are no specific comments on the contents in the Draft IS/MND.

#### Comment 2-B

The comment explains which State facilities are closest to the project area and that Caltrans does not expect project approval to result in direct impacts to those facilities.

## Response 2-B

The comment is noted and saved in the project file. No response is required because there are no specific comments on the contents in the Draft IS/MND.

## Comment 2-C

The comment requests that if construction traffic is expected to cause delays on State facilities, a Traffic Control Plan be submitted to Caltrans. The comment then explains that any construction that requires the transportation of heavy equipment on State highways would require a permit. The comment recommends that large size truck trips be limited to off-peak commute periods to minimize congestion and ensure maximum safety conditions for pedestrians, cyclists, and motorists. Further, the comment reiterates Senate Bill 743 and how to identify traffic impacts starting July 1, 2020. Lastly, the comment states that storm-water runoff is a sensitive issue for LA County and needs to be considered during project design. The comment closes with providing Caltrans contact information.

## Response 2-C

Section 4.17, Transportation, of the Draft IS/MND describes potential impacts including delays within the project area. No project delays are anticipated on any Caltrans facilities. If for some reason, the transportation of heavy construction equipment requires the use of oversized-transport vehicles on State highways, the City will ensure that the appropriate Caltrans transportation permit is acquired. The commenter notes that strategies should be identified in the Traffic Control Plan to ensure deliveries during design and construction do not cause traffic conflicts. Pages 105-107 of the Draft IS/MND describe how the City will control such construction traffic and indicate the City will cooperate with other agencies in formulating a Traffic Control Plan. Mitigation Measure TR-1 explains how the City will coordinate with the appropriate agencies before and during construction to ensure that congestion is minimized for pedestrians, cyclists and motorists. In response to the comment, Mitigation Measure TR-1 has been revised to include Caltrans as an agency that will be consulted, as appropriate, in the formation of the Traffic Control Plan, on Page 107 of the Draft IS/MND:

**TR-1:** Prior to the start of construction of the project, the City shall require the construction contractor to prepare a Traffic Control Plan. The Traffic Control Plan will be separated into two different sections: the first section being for construction management within the Well Site and surrounding local roadways; and second, for construction management in areas located along the proposed transmission main rehabilitation areas and proposed new transmission main areas.

The Traffic Control Plan will show all signage, striping, delineated detours, flagging operations and any other devices that will be used during construction to guide motorists, bicyclists, and pedestrians safely through the construction area and allow for adequate access and circulation to the satisfaction of the City of Los Angeles, City of Beverly Hills, Los Angeles County, Metro, and Caltrans, as applicable. The Traffic Control Plan shall be prepared in accordance with the City of Los Angeles and the City of Beverly Hills' traffic control guidelines and will be prepared to ensure that access will be maintained to individual properties, that emergency access will not be restricted, and that

public transit will not be significantly disrupted. The Traffic Control Plan will ensure that written notices are provided to affected property owners and that detours or alternative routes are provided for public transit, bicyclists using on-street bicycle lanes, and pedestrians using adjacent sidewalks.

Section 4.17(b) of the Draft IS/MND discusses transportation impacts in terms of vehicle miles travelled and indicates that the project would not result in any perceivable increase in vehicle miles traveled that would exceed a threshold of significance either during construction or during implementation. Last, the commenter does not raise any impacts associated with storm water runoff, but suggests that such issues be considered. The potential impacts regarding storm-water runoff are considered and are discussed in detail in Sections 4.7 and 4.10 of the Draft IS/MND. The project will be subject to a Construction General Permit (CGP) under the National Pollutant Discharge Elimination System (NPDES) permit program of the federal Clean Water Act. As required under the CGP, the City or its contractor will prepare and implement a Storm Water Pollution Prevention Plan (SWPPP). The objectives of a SWPPP is to identify pollutant sources (such as sediment) that may affect the quality of storm water discharge and to implement best management practices (BMPs) to reduce pollutants in storm water. Section 4.19, Utilities and Service Systems, discusses why the project does not require expanded storm water drainage systems. Thus, the Draft IS/MND adequately addresses storm water runoff issues. The City appreciates the contact information for Caltrans and will coordinate in the future, if necessary.

## **Letter 3: Los Angeles County Metropolitan Transportation Authority (Metro)**

### **Comment 3-A**

The comment acknowledges receipt of the Draft IS/MND and summarizes the purpose of the letter – to outline recommendations from Metro. The comment also provides two Metro resources.

### **Response 3-A**

The City appreciates the guidance documents provided by Metro. The documents are saved in the project record. No response is required because there are no specific comments on the contents in the Draft IS/MND.

### **Comment 3-B**

The comment reiterates the project description and mentions that the project is adjacent to the Purple Line Extension that is currently under construction.

### **Response 3-B**

No response is required because there are no specific comments on the contents in the Draft IS/MND.

## Comment 3-C

The comment explains that the proposed transmission main is located adjacent to bus stops and that transit operators in the immediate area should be consulted. The comment explains that the MND should analyze potential effects on Metro Bus service, including construction traffic, operation of and shipment/deliveries to the completed project, and temporary or permanent bus service rerouting. The comment then provides Metro Bus contacts and states that construction outreach efforts should be initiated 30 days prior to construction starts.

## Response 3-C

As described on Page 105 of the Draft IS/MND within the Transportation Section, the City is aware of Metro's bus services at La Cienega/Guthrie and along the length of La Cienega Boulevard. The Draft IS/MND analyses potential traffic impacts, which would include such Metro services. In order to minimize potential impacts to bus services, nighttime construction will be implemented along La Cienega as much as possible. Furthermore, as described in Section 2, Project Description, the required construction equipment for various stages of construction would be staged in areas adjacent to public rights-of-ways or within the Well Site boundary, and would be temporary in nature. Construction equipment would not be traveling to and from the project sites day-to-day. Bus services could experience increased travel times if buses were traveling behind a heavy truck due to slower movement and turning radii compared to passenger vehicles; these delays would be intermittent throughout the day and would cease once construction activities are completed. No full lane closures are anticipated to occur under the proposed project; therefore, no alternative bus routes would be required during the duration of construction activities for the project. Implementation of Mitigation Measure TR-1 would prepare the Traffic Control Plan one for the proposed transmission main. The Traffic Control Plan will assist motorists, including public transit through construction areas. As described on Page 106 of the Draft IS/MND, the Traffic Control Plan for the proposed project would be coordinated with Los Angeles County and Metro when construction activities affect roadways and public transit under its jurisdiction. Specifically, the City will ensure that the project's contractor will coordinate with Metro Bus Operations staff with any questions and to ensure they receive ample notice of delays at least 30 days in advance of construction activities. Metro coordination efforts will be included in construction contractor specifications. Thus, the Draft IS/MND identifies mitigation measures for any potential impacts on Metro buses. Further, as described on Page 107 of the Draft IS/MND, once the project is operational there will not be an expected increase in vehicle trips to the project location. There would be no impacts, or less than significant traffic impacts, associated with the operation of and shipment/deliveries to the completed project location.

Additionally, in response to the comment, Mitigation Measure TR-1 has been revised to include Metro as an agency that will be consulted, as appropriate, in the formation of the Traffic Control Plan, on page 107 of the Draft IS/MND;

**TR-1:** Prior to the start of construction of the project, the City shall require the construction contractor to prepare a Traffic Control Plan. The Traffic Control Plan will be separated into two different sections: the first section being for construction management within the Well Site and surrounding local roadways; and second, for construction

management in areas located along the proposed transmission main rehabilitation areas and proposed new transmission main areas.

The Traffic Control Plan will show all signage, striping, delineated detours, flagging operations and any other devices that will be used during construction to guide motorists, bicyclists, and pedestrians safely through the construction area and allow for adequate access and circulation to the satisfaction of the City of Los Angeles, City of Beverly Hills, Los Angeles County, Metro, and Caltrans, as applicable. The Traffic Control Plan shall be prepared in accordance with the City of Los Angeles and the City of Beverly Hills' traffic control guidelines and will be prepared to ensure that access will be maintained to individual properties, that emergency access will not be restricted, and that public transit will not be significantly disrupted. The Traffic Control Plan will ensure that written notices are provided to affected property owners and that detours or alternative routes are provided for public transit, bicyclists using on-street bicycle lanes, and pedestrians using adjacent sidewalks.

### Comment 3-D

The comment states that the project is located adjacent to the Metro Westside Purple Line extension. The comment highly encourages City staff to contact Metro staff early in the design process to ensure potential impacts to the Purple Line tunnel intersection at Wilshire Boulevard and North Le Doux Road are minimized. The comment then recommends mitigation measures/project design features to address potential impacts such as: coordinating with Metro along haul routes; construction contractor should submit site plans, engineering drawings and other documentation to Metro for approval before construction; and that the City's construction contractor shall permit Metro staff to monitor construction activities to ascertain impacts to the Purple Line.

### Response 3-D

The City appreciates the information provided regarding the Metro Purple Line work that is currently underway. To address concerns with Metro's Purple Line (subway) work, specifically, Page 105 in Section 4.17 of the Draft IS/MND has been revised as follows:

- a) **Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?**

**Less than Significant with Mitigation Incorporated.** The project proposed would install a well, pump-to-waste stormdrain line within Chariton Street adjacent to the Well Site, and a transmission main. The Well Site would be located at 1956 Chariton Street. The proposed transmission main would be approximately four miles long. The proposed rehabilitation portion of the transmission main (existing inactive 18 and 24-inch pipelines) are shown on Figure 2. Construction equipment, vehicles, personnel, and materials staging areas would be located onsite at the Well Site, within adjacent City-owned property, or immediately adjacent to the transmission main construction areas along streets/roadways, where such areas can be accommodated.

There are no bicycle facilities within the project area along the local roadways such as Chariton Street and La Cienega. Transit services in the cities of Los Angeles and Beverly Hills are provided by the Los Angeles County Metropolitan Transportation Authority (Metro) (Metro 2019). There are many transit locations and opportunities for bus and subway services within the project area. The closest bus stop is located at the intersection of La Cienega and Guthrie, which runs along Route 105 in the northern/southward direction. While, Metro's Purple Line (subway) is located within the project area near the proposed transmission main. It should be noted that Metro is currently working on the Purple Line within the City of Los Angeles.

The proposed transmission main rehabilitation and new construction areas were specifically designed to avoid impacts to the Metro Purple Line construction work and future operations. The areas in which the proposed transmission main would be implemented along North Le Doux Road, specifically, would utilize slip-lining techniques which would minimize disturbance to areas near Metro facilities. Slip-lining construction involves installing a new pipe within an existing host pipe using trenchless construction methods to cross Wilshire Boulevard. Slip-lining eliminates the need for active construction areas which would require partial lane/road closures, which could impact traffic.

Further, the City of Beverly Hills and their contractor will coordinate with Metro during the construction design and planning, including the development of a Traffic Control Plan (see Mitigation Measure TR-1, below). This will ensure that Metro's Purple Line work is not adversely impacted and that Metro's work will not interfere with the proposed transmission main, once implemented. As such, the project would not significantly impact Purple Line construction haul routes or construction activities.

Construction of the proposed project is anticipated to occur over approximately 13 months, at night and throughout the day. All daytime construction would occur during typical construction hours ranging between 7:00 a.m. to 7:00 p.m., Monday through Friday except on federal holidays.

As the comment recommends, the City's contractor will coordinate with Metro no less than two months prior to construction activities and can accommodate Metro staff to monitor construction activities that may take place near the Metro Purple Line. Metro coordination efforts will be included in construction contractor specifications.

### Comment 3-E

The comment provides a final contact if there are any questions regarding Metro's comment letter.

### Response 3-E

The contact information is saved to the project record. The City will contact the number provided if any questions arise.



## **Letter 4: South Coast Air Quality Management District (SCAQMD)**

### **Comment 4-A**

The comment acknowledges receipt of the Draft IS/MND and reiterates the project description.

### **Response 4-A**

No response is required because there are no specific comments on the contents in the Draft IS/MND.

### **Comment 4-B**

The comment summarizes the significance determinations of the proposed project in regards to the air quality analysis.

### **Response 4-B**

No response is required because there are no specific comments on the contents in the Draft IS/MND.

### **Comment 4-C**

Although the emissions were below the applicable significance threshold, the commenter nonetheless recommends the adoption of an additional mitigation measure for the Final MND. The commenter recommends that all off-road diesel-powered construction equipment meet or exceed Tier 4 off-road emissions standards for equipment rated 50 horsepower or greater during construction. The commenter recommends the Lead Agency require that each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) be available upon request and require periodic reporting. Additionally, the commenter recommends that the Lead Agency require written documentation by contractors to ensure compliance and conduct regular inspections to ensure compliance.

### **Response 4-C**

This comment is noted and saved in the project record. Section 4.3 of the Draft IS/MND addresses air quality. The air quality analysis for the proposed project assumes Tier 3-compliant equipment would be used. As shown on Page 33 in Table 3 of the Draft IS/MND, maximum daily construction emissions would not exceed SCAQMD daily significance thresholds with utilization of Tier 3-compliant equipment. No mitigation measures are required to reduce emissions to less-than-significant levels. Pursuant to CEQA Guidelines Section 15126.4(a)(3), mitigation measures are not required for effects which are not found to be significant. Thus, there is no requirement to incorporate the commenter's proposed mitigation measure requiring the use of Tier 4 construction equipment.

Nonetheless, the City will recommend that Tier 4 compliant equipment be utilized where such equipment is reasonably available at reasonable economic terms, to ensure maximum reduction in emissions. Further, in the event that Tier 4 equipment is not used, the City will recommend the following best practices: construction equipment with Tier 4 Interim or Tier 3 emission standards be used; reduction in the number and/or horsepower rating of construction equipment; limiting the number of daily construction haul truck trips to and from the proposed project; and/or limiting construction phases occurring simultaneously. This information will be included in construction contractor specifications.

## Comment 4-D

The comment requests that written responses to their comments are received during the public review process, pursuant to CEQA Guidelines Section 15074.

## Response 4-D

The comment is noted and saved in the project record. The City will provide SCAQMD with a response to their comments.

## Comment 4-E

The comment provides a SCAQMD contact for any questions.

## Response 4-E

The comment is noted and saved in the project record. The City will coordinate with the SCAQMD, as necessary.

## Letter 5: Call Log

### Comment 5-A

The comment was via phone call by Kimberly Terry. She asked why the transmission line would not be placed on Robertson Boulevard and inquired about where the traffic would go. She then asked if the City of Beverly Hills is allowed to take water from the City of Los Angeles, and whether the City of Los Angeles would allow this.

### Response 5-A

The proposed transmission line was specifically designed to avoid and/or minimize potential impacts to existing utilities underground within the project area and local vicinity. An alignment analysis was conducted under a separate study in 2015 that evaluated La Cienega Boulevard, Robertson Boulevard, and a westerly route through neighborhood streets. The alignment in La Cienega Boulevard was determined to have the least construction impacts due to the slip-lining construction method proposed which reduces excavation. The option in Robertson Boulevard would require “open-cut” construction methods and would have a greater impact to the community. Thus, because it had lower construction impacts, the La Cienega route was selected over the Robertson Boulevard route. As a result of the project construction, there is the potential

for some traffic delays. As described in Section 4.17 of the Draft IS/MND, Transportation, the project would be required to implement Mitigation Measure TR-1, which includes specific Traffic Control Plans for project components. These plans would re-route some traffic and would ensure that traffic would be minimized as much as possible and provide motorists with detours and safety design measures. The Traffic Control Plans will be reviewed by multiple applicable jurisdictions including the City of Los Angeles, the City of Beverly Hills, Caltrans and Metro.

Furthermore, as described in Section 2.1 of the Draft IS/MND Project Description, the La Brea Subarea within the Central Basin is not adjudicated. That is, there are no various stipulations on utilization of groundwater in this area. Further, the City of Beverly Hills has a history of implementing groundwater wells within the La Brea Subarea. The City of Los Angeles is a Responsible Agency under CEQA for the project's IS/MND, and the City of Beverly Hills has been and intends to continue to coordinate with the City of Los Angeles, as necessary. Groundwater modeling and extensive research has been conducted within the La Brea Subarea to ensure the safe yield of the Subbasin (see Section 4.10, Hydrology and Water Quality for more details).

## Comment 5-B

The comment was via phone call by Sheryl. She asked where the existing pipe on La Cienega is located and asked about the timing of construction.

## Response 5-B

As described in Section 2.3 of the Draft IS/MND's Project Description, the existing 18- and 24-inch transmission main areas that will be rehabilitated are located within La Cienega Boulevard to Olympic Boulevard and within Le Doux Road from Gregory Way to Clifton Way. Please refer to Figure 2 of the Draft IS/MND. The existing transmission main is illustrated with a dashed purple line, as denoted in the figure legend.

Section 2.5.1 of the Draft IS/MND provides information regarding the project's construction schedule. Project construction would take place for approximately 13 months, from Winter 2020 through Summer 2021, with several activities potentially occurring in parallel. Construction activities would occur during nighttime and on weekends for the 24-hour drilling of the production well, requiring approximately 120 days of drilling and testing. Nighttime construction would also be required for the rehabilitation and construction of the transmission main along La Cienega Boulevard because it is within a commercial area. This nighttime construction would minimize impacts to traffic and construction delays within roadways. The remainder of the proposed well and transmission main would involve construction typically occurring between 7:00 a.m. and 7:00 p.m., Monday through Friday, and 8:00 a.m., and 6:00 p.m., Saturdays. No work is allowed on Sundays and federal holidays.

To document these changes to schedule and construction timing, Page 12 of the Draft IS/MND has been revised as follows:

Project construction would take place for approximately 13 months, from ~~Fall 2019 through Winter 2020~~, through Summer 2021, with several activities potentially occurring in parallel. Construction activities would occur during nighttime and weekends for the 24-hour drilling of the production requiring approximately 120 days of drilling and testing. Nighttime construction would also be required for the rehabilitation and construction of the transmission main along La Cienega Boulevard because it is within a commercial area. This nighttime construction would minimize impacts to traffic and construction delays within roadways.

The remainder of the proposed well and transmission main would involve construction typically occurring between 7:00 a.m. and ~~7~~9:00 p.m., Monday through Friday except on federal holidays.

## Comment 5-C

The comment was via phone call by Lori Laboy. She asked why 18- and 24-inch lines are being replaced with 16-inch lines, and inquired about how long construction will take and when it will start.

## Response 5-C

The transmission main rehabilitation and construction are discussed on pages 14 and 15 of the Draft IS/MND. The proposed transmission main was designed to accommodate proposed groundwater well flows to the Foothill Water Treatment Plant. A larger diameter pipeline is not required. The 18-inch and 24-inch pipelines are not in service. They are acting as host pipes for the slip-lining construction method. The slip-lining method maximizes the internal diameter of the pipe, which maximizes the benefit of utilizing the existing inactive 18 and 24-inch inch transmission main. The difference in pipeline sizes is being accounted for in the design of the new facilities.

Please refer to Response 5-B, above for information about construction.

## Comment 5-D

The comment was via phone call from Norman Zafman. He expressed concerns about the pipeline being located on Le Doux between Gregory and Charleville.

## Response 5-D

This area of proposed transmission main construction would include a slip-lining technique, which includes minimal disturbance to the roadway above and surrounding areas. Locating the pipeline in Le Doux Road was chosen because of the availability of utilizing inactive pipelines to act as host pipes for the slip-lining technique, which reduces construction impacts compared to constructing using “open-cut” trenching methods which would be required on a parallel street.

## Comment 5-E

The comment was via phone call from Sylvia Ashly. She expressed concern about chemical treatments and is against chemical treatment and potential pollutants onsite.

## Response 5-E

The Draft IS/MND addresses water treatment and impacts by pollutants. As noted throughout the Draft IS/MND, all groundwater extracted at the proposed Well Site would be sent to the City's existing Foothill Water Treatment Plant where it will be treated to State drinking water standards. Further, the Draft IS/MND addresses potential pollutants onsite. Section 4.9, Hazards and Hazardous Materials, addresses how hazardous materials will be handles on site. And Section 4.10, Hydrology and Water Quality, indicates that the project would be subject to a Construction General Permit (CGP) under the National Pollutant Discharge Elimination System (NPDES) permit program of the federal Clean Water Act, which requires the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP). The objectives of a SWPPP is to identify pollutant sources that may affect the quality of storm water discharge and to implement best management practices (BMPs) to reduce pollutants in storm water.

## Comment 5-F

The comment was via phone call from Fatima Choudary with Caltrans. She was concerned the project figures showed existing utilities near the onramp to the freeway.

## Response 5-F

Figure 2 of the Draft IS/MND illustrates a zoomed-out area of the project vicinity and proposed components. Existing and proposed project facilities would not be located on or near Caltrans facilities and would not interfere with day-to-day Caltrans operations. The project does not include an access point immediately adjacent to the freeway. The access point would likely be located adjacent to the proposed Well Site, near the intersection of Guthrie Avenue and Chariton Street.

# CHAPTER 4

## Corrections and Additions to the Draft IS/MND

### Section 4.1 Introduction

This chapter contains a compilation of revisions made to the text of the Draft IS/MND by the City as the Lead Agency, in response to the comments received during the 30-day public review period as well as minor edits. All revisions are previously introduced in Chapter 3 of this Final IS/MND but are summarized here for convenience of the reader. Where the responses indicate additions or deletions to the text of the Draft IS/MND, additions are indicated in underline and deletions in ~~strikeout~~.

#### Page 12

Project construction would take place for approximately 13 months, from ~~Fall 2019 through Winter 2020~~, through Summer 2021, with several activities potentially occurring in parallel. Construction activities would occur during nighttime and weekends for the 24-hour drilling of the production requiring approximately 120 days of drilling and testing. Nighttime construction would also be required for the rehabilitation and construction of the transmission main along La Cienega Boulevard because it is within a commercial area. This nighttime construction would minimize impacts to traffic and construction delays within roadways.

The remainder of the proposed well and transmission main would involve construction typically occurring between 7:00 a.m. and ~~7~~9:00 p.m., Monday through Friday except on federal holidays.

#### Page 105

- a) **Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?**

**Less than Significant with Mitigation Incorporated.** The project proposed would install a well, pump-to-waste stormdrain line within Chariton Street adjacent to the Well Site, and a transmission main. The Well Site would be located at 1956 Chariton Street. The proposed transmission main would be approximately four miles long. The proposed rehabilitation portion of the transmission main (existing inactive 18 and 24-inch pipelines) are shown on Figure 2. Construction equipment, vehicles, personnel, and materials staging areas would be located onsite at the Well Site, within adjacent City-owned property, or immediately adjacent to the transmission main construction areas along streets/roadways, where such areas can be accommodated.

There are no bicycle facilities within the project area along the local roadways such as Chariton Street and La Cienega. Transit services in the cities of Los Angeles and Beverly Hills are provided by the Los Angeles County Metropolitan Transportation Authority (Metro) (Metro 2019). There are many transit locations and opportunities for bus and subway services within the project area. The closest bus stop is located at the intersection of La Cienega and Guthrie, which runs along Route 105 in the northern/southward direction. While, Metro's Purple Line (subway) is located within the project area near the proposed transmission main. It should be noted that Metro is currently working on the Purple Line within the City of Los Angeles.

The proposed transmission main rehabilitation and new construction areas were specifically designed to avoid impacts to the Metro Purple Line construction work and future operations. The areas in which the proposed transmission main would be implemented along North Le Doux Road, specifically, would utilize slip-lining techniques which would minimize disturbance to areas near Metro facilities. Slip-lining construction involves installing a new pipe within an existing host pipe using trenchless construction methods to cross Wilshire Boulevard. Slip-lining eliminates the need for active construction areas which would require partial lane/road closures, which could impact traffic.

Further, the City of Beverly Hills and their contractor will coordinate with Metro during the construction design and planning, including the development of a Traffic Control Plan (see Mitigation Measure TR-1, below). This will ensure that Metro's Purple Line work is not adversely impacted and that Metro's work will not interfere with the proposed transmission main, once implemented. As such, the project would not significantly impact Purple Line construction haul routes or construction activities.

Construction of the proposed project is anticipated to occur over approximately 13 months, at night and throughout the day. All daytime construction would occur during typical construction hours ranging between 7:00 a.m. to 7:00 p.m., Monday through Friday except on federal holidays. Nighttime construction would be required for 24-hour drilling and testing of the proposed well. Nighttime construction would also take place along various areas of La Cienega for the transmission main rehabilitation, connection and new pipeline construction. Nighttime construction of the transmission main is proposed in order to avoid traffic congestion/interferences as much as possible. Nighttime construction would only occur in various areas along La Cienega where nighttime construction is permitted due to being located within a commercial area. Nighttime construction would require approval from the City of Los Angeles. Construction activities, scheduling, and number of workers could overlap between the construction of the well, associated storm drain (pump-to-waste.) and the transmission main. Construction truck and vehicle trips would be generated primarily by construction workers commuting to and from the work sites, and by trucks hauling materials and equipment to and from the well and transmission main sites. Construction trucks and vehicles would use the regional circulation system, as well as the main roadways within the cities of Los Angeles and Beverly Hills. Based on the designated construction truck routes established in the cities' General Plans, construction trucks would primarily use La Cienega Boulevard, Sawtelle Boulevard, Venice Boulevard, Sepulveda Boulevard, Manchester, Adams, Olympic Boulevard, 3<sup>rd</sup> Street,

and Santa Monica Boulevard to bring construction materials and construction workers to the project area (City of Los Angeles 2016; City of Beverly Hills 2010).

## Page 107

**TR-1:** Prior to the start of construction of the project, the City shall require the construction contractor to prepare a Traffic Control Plan. The Traffic Control Plan will be separated into two different sections: the first section being for construction management within the Well Site and surrounding local roadways; and second, for construction management in areas located along the proposed transmission main rehabilitation areas and proposed new transmission main areas.

The Traffic Control Plan will show all signage, striping, delineated detours, flagging operations and any other devices that will be used during construction to guide motorists, bicyclists, and pedestrians safely through the construction area and allow for adequate access and circulation to the satisfaction of the City of Los Angeles, City of Beverly Hills, Los Angeles County, Metro, and Caltrans, as applicable. The Traffic Control Plan shall be prepared in accordance with the City of Los Angeles and the City of Beverly Hills' traffic control guidelines and will be prepared to ensure that access will be maintained to individual properties, that emergency access will not be restricted, and that public transit will not be significantly disrupted. The Traffic Control Plan will ensure that written notices are provided to affected property owners and that detours or alternative routes are provided for public transit, bicyclists using on-street bicycle lanes, and pedestrians using adjacent sidewalks.



# CHAPTER 5

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## Mitigation Monitoring and Reporting Program

### 5.1 CEQA Requirements

Section 15091(d) and Section 15097 of the CEQA Guidelines require a public agency to adopt a program for monitoring or reporting on the changes it has required in the project or conditions of approval to substantially lessen significant environmental effects. This Mitigation, Monitoring and Reporting Program (MMRP) summarizes the mitigation commitments identified in the La Brea Subarea Well and Transmission Main Project (proposed project) (State Clearinghouse No. 2019099076). Mitigation measures are presented in the same order as they occur in the Final IS/MND.

The columns in the MMRP table provide the following information:

- **Mitigation Measure(s):** The action(s) that will be taken to reduce the impact to a less-than-significant level.
- **Implementation, Monitoring, and Reporting Action:** The appropriate steps to implement and document compliance with the mitigation measures.
- **Responsibility:** The agency or private entity responsible for ensuring implementation of the mitigation measure. However, until the mitigation measures are completed, the City, as the CEQA Lead Agency, remains responsible for ensuring that implementation of the mitigation measures occur in accordance with the MMRP (CEQA Guidelines, Section 15097(a)).
- **Monitoring Schedule:** The general schedule for conducting each task, either prior to construction, during construction and/or after construction.

**TABLE 5-1  
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE LA BREA SUBAREA WELL AND TRANSMISSION MAIN PROJECT**

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
<b>Biological Resources</b>			
<p><b>BIO-1:</b> The City shall be responsible for the implementation of mitigation to reduce impacts to migratory and/or nesting bird species to below a level of significance through one of the following two ways:</p> <ol style="list-style-type: none"> <li>1. Vegetation removal and demolition of structures shall be scheduled outside the avian nesting season which runs from February 15 to August 31 to avoid potential impacts to nesting birds; or</li> <li>2. If avoidance of the avian nesting season (February 15 through August 31) is not feasible then the following shall occur:               <ol style="list-style-type: none"> <li>a) A qualified biologist (i.e. biologist(s) familiar with local nesting bird species and their behavior) shall conduct a preconstruction nesting bird survey no more than 3 days prior to any vegetation removal or demolition of structures. The survey shall be conducted to ensure that impacts to birds, including raptors, protected by the MBTA and/or the California Fish and Game Code and bat maternity colonies are avoided. Survey areas shall include suitable avian nesting habitat.</li> <li>b) If active nests of protected birds are identified during pre-construction surveys, an avoidance buffer area shall be determined at the discretion of the qualified biologist and demarcated for avoidance using flagging, staking, fencing, or another appropriate barrier to delineate construction avoidance until the nest is determined to no longer be active by a qualified biologist (i.e., young have fledged or no longer alive within the nest). An active nest is defined as a structure or site under construction or preparation, constructed or prepared, or being used by a bird for the purpose of incubating eggs or rearing young. Perching sites and screening vegetation are not part of the nest. Construction personnel shall be informed of the active nest and avoidance requirements. A biological monitor shall review the Project Site, at a minimum of one-week intervals, during all construction activities occurring near active nests to ensure that no inadvertent impacts to active nests occur. Pre-construction nesting bird surveys and monitoring results shall be submitted to the City of Beverly Hills Planning Division via email or memorandum upon completion of the pre-construction surveys and/or construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of native birds.</li> </ol> </li> </ol>	<ul style="list-style-type: none"> <li>• Include mitigation measure in construction contractor specifications.</li> <li>• Retain copies of the survey(s) in the project file.</li> <li>• Prepare reports to document any nesting bird species prior to construction activities.</li> <li>• Perform additional survey(s) if there is a lapse of construction activities for seven days or more.</li> <li>• Prepare reports to document any nesting bird species prior to resuming construction activities.</li> <li>• Retain surveys and reports in the project file.</li> </ul>	<p>The City; Construction Contractor</p>	<p>Before and During Construction</p>

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
<b>Cultural Resources</b>			
<p><b>CUL-1: Retention of Qualified Archaeologist.</b> Prior to the start of any ground disturbing activities, a qualified archaeologist, defined as an archaeologist meeting the Secretary of the Interior's Standards for professional archaeology (U.S. Department of the Interior 2008) shall be retained by the City of Beverly Hills to carry out all mitigation measures related to cultural resources. In addition, the City of Beverly Hills will retain a Native American monitor to work in tandem with the archaeologist in the areas and during activities with potential to encounter prehistoric archaeological resources.</p>	<ul style="list-style-type: none"> <li>• Include mitigation measure in construction contractor specifications.</li> <li>• Retain documentation of retaining a qualified archaeologist in the project file.</li> </ul>	The City; Construction Contractor	Before and During Construction
<p><b>CUL-2: Cultural Resources Sensitivity Training.</b> Prior to start of any ground-disturbing activities, the qualified archaeologist shall conduct cultural resources sensitivity training for all construction personnel associated with the proposed project. Construction personnel shall be informed of the types of cultural resources that may be encountered during construction, and of the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains. The City of Beverly Hills shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.</p>	<ul style="list-style-type: none"> <li>• Include mitigation measure in construction contractor specifications.</li> <li>• Retain documentation demonstrating attendance of construction personnel to cultural resources sensitivity training.</li> </ul>	The City; Construction Contractor	Before and During Construction
<p><b>CUL-3: Construction Monitoring.</b> An archaeological monitor (working under the direct supervision of the qualified archaeologist) shall observe all excavation activities associated with the installation of the Well Site. For the portion of the alignment requiring installation of the new transmission mains, an archaeological monitor and Native American monitor will conduct full time monitoring of all excavations including trenching and bore pits. For the portion of the alignment which involves the rehabilitation of existing transmission mains, an archaeological monitor and Native American monitor will conduct full time monitoring on all access points along the rehabilitation alignment. Should the soils prove to be too disturbed to contain archaeological resources these spot checks can be reduced or discontinued. Conversely, if the sediments are found to contain archaeological resources, the qualified archaeologist may recommend full time monitoring for such areas along the route. The qualified archaeologist, in coordination with the City of Beverly Hills, may reduce or discontinue monitoring if it is determined that the possibility of encountering buried archaeological deposits is low based on observations of soil stratigraphy or other factors. Archaeological monitoring shall be conducted by an archaeologist familiar with the types of archaeological resources that could be encountered within the proposed project. The archaeological monitor(s) shall be empowered to halt or redirect ground-disturbing activities away from the vicinity of a discovery until the qualified archaeologist has evaluated the discovery and determined appropriate treatment (as prescribed in Mitigation Measure CUL-4). The archaeological monitor shall keep daily logs detailing the types of activities and soils observed, and any discoveries. After monitoring has been completed, the qualified archaeologist shall prepare a monitoring report that details the results of monitoring. The report shall be submitted to the City of Beverly Hills. The qualified archaeologist shall submit a copy of the final report to the SCCIC.</p>	<ul style="list-style-type: none"> <li>• Include mitigation measure in construction contractor specifications.</li> <li>• Perform site inspections to ensure compliance with cultural sensitivity requirements.</li> <li>• Retain all archeological and tribal inspection forms in the project file.</li> <li>• Retain copy of final archaeological report in the project file.</li> </ul>	The City; Construction Contractor	Before and During Construction

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
<p><b>CUL-4: Unanticipated Discoveries.</b> In the event of an unanticipated discovery of archaeological materials, all work shall immediately cease in the area (within approximately 100 feet) of the discovery until it can be evaluated by the qualified archaeologist. Construction shall not resume until the qualified archaeologist has conferred with the City of Beverly Hills, and the appropriate Native American representatives for prehistoric resources, on the significance of the resource.</p>	<ul style="list-style-type: none"> <li>• Include mitigation measure in construction contractor specifications.</li> <li>• Perform site inspections to ensure compliance with cultural sensitivity requirements.</li> <li>• Retain inspection forms in the project file.</li> <li>• Retain correspondence between archeologist and Native American representative.</li> <li>• Retain a copy of Archeological Resources Treatment Plan (if one is required) in the project file.</li> </ul>	<p>The City; Construction Contractor</p>	<p>Before and During Construction</p>
<p><b>CUL-5: Unanticipated Discovery of Human Remains and Associated Funerary Objects.</b> In the event human remains and/or associated funerary objects are encountered during construction of the proposed project, all activity in the vicinity of the find shall cease (within 100 feet). Human remains discoveries shall be treated in accordance with and California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98, requiring assessment of the discovery by the County Coroner, assignment of a Most Likely Descendant by the NAHC, and consultation between the Most Likely Descendant and the landowner regarding treatment of the discovery. Until the landowner has conferred with the Most Likely Descendant, the City of Beverly Hills shall ensure that the immediate vicinity where the discovery occurred is not disturbed by further activity and that further activities take into account the possibility of multiple burials.</p>	<ul style="list-style-type: none"> <li>• Include mitigation measure in construction contractor specifications.</li> <li>• Retain inspection forms in the project file.</li> <li>• Retain NAHC correspondence in project files, if necessary.</li> </ul>	<p>The City; Construction Contractor</p>	<p>Before and During Construction</p>
<p><b>GEO-1:</b> A qualified paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards (SVP 2010) (Qualified Paleontologist) shall be retained prior to the approval of demolition or grading permits. The Qualified Paleontologist shall provide technical and compliance oversight of all work as it relates to paleontological resources, shall attend the project kick-off meeting and Project progress meetings on a regular basis, and shall report to the project site in the event potential paleontological resources are encountered.</p>	<ul style="list-style-type: none"> <li>• Include mitigation measure in construction contractor specifications.</li> <li>• Retain documentation of retaining a qualified paleontologist in the project file.</li> </ul>	<p>The City; Construction Contractor</p>	<p>Before and During Construction</p>
<p><b>GEO-2:</b> The Qualified Paleontologist shall conduct construction worker paleontological resources sensitivity training at the project kick-off meeting prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.). In the event construction crews are phased, additional training shall be conducted for new construction personnel. The training session shall focus on the recognition of the types of paleontological resources that could be encountered within the project site and the procedures to be followed if they are found. Documentation shall be retained by the Qualified Paleontologist demonstrating that the appropriate construction personnel attended the training.</p>	<ul style="list-style-type: none"> <li>• Include mitigation measure in construction contractor specifications.</li> <li>• Retain documentation demonstrating attendance of construction personnel to paleontological resources training.</li> </ul>	<p>The City; Construction Contractor</p>	<p>Before and During Construction</p>

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
<p><b>GEO-3:</b> The Qualified Paleontologist shall develop a Paleontological Resources Monitoring Plan (PRMP) that shall detail the monitoring program necessary for the project, based off of specific construction methodologies and locations. Construction activities have varying impacts on paleontological resources and may require different monitoring procedures. The PRMP shall take the specific construction plans for the project to tailor a monitoring plan to the types of construction activities and the geologic units each may encounter. In general, ground disturbance across the project site that occurs in undisturbed sediments and exceeds 5-10 feet in depth may impact high potential sediments and therefore should be monitored. This includes; excavation and site preparation at the Well Site, drilling for the production well, cut and cover and entrance and exit pits for jack and bore along the proposed transmission main and at all access points for the rehabilitation of the transmission main. Paleontological resources monitoring shall be performed by a qualified paleontological monitor (meeting the standards of the SVP 2010) under the direction of the Qualified Paleontologist. Depending on the conditions encountered, full-time monitoring can be reduced to part-time inspections or ceased entirely if determined adequate by the Qualified Paleontologist. The Qualified Paleontologist shall spot check the excavation on an intermittent basis and recommend whether the depth of required monitoring should be revised based on his/her observations. Monitors shall have the authority to temporarily halt or divert work away from exposed fossils or potential fossils. Monitors shall prepare daily logs detailing the types of activities and soils observed, and any discoveries. Any significant fossils collected during project-related excavations shall be prepared to the point of identification and curated into an accredited repository with retrievable storage. The Qualified Paleontologist shall prepare a final monitoring and mitigation report for submittal to the City in order to document the results of the monitoring effort and any discoveries.</p>	<ul style="list-style-type: none"> <li>• Include mitigation measure in construction contractor specifications.</li> <li>• Retain copies of all paleontological research, survey and PRMP in the project file.</li> <li>• Perform site monitoring to ensure compliance with paleontological requirements.</li> <li>• Retain inspection forms in the project file.</li> </ul>	<p>The City; Construction Contractor</p>	<p>Before and During Construction</p>
<p><b>GEO-4:</b> Any significant fossils collected during project-related excavations shall be prepared to the point of identification and curated into an accredited repository with retrievable storage. The Qualified Paleontologist shall prepare a final monitoring and mitigation report for submittal to the City in order to document the results of the monitoring effort and any discoveries. If there are significant discoveries, fossil locality information and final disposition will be included with the final report which will be submitted to the appropriate repository and the City.</p>	<ul style="list-style-type: none"> <li>• Include mitigation measure in construction contractor specifications.</li> <li>• Paleontological monitoring reports and logs will be retained in project file.</li> <li>• Retain fossil recovery logs in the project file.</li> </ul>	<p>The City; Construction Contractor</p>	<p>Before and During Construction</p>
<p><b>Hazards and Hazardous Materials</b></p>			
<p><b>HAZ-1:</b> Prior to the initiation of any construction requiring ground-disturbing activities, the City shall complete an environmental assessment of the proposed site to locate the potential for soil and groundwater contamination in the project area. The recommendations set forth in the site assessment shall be implemented to the satisfaction of applicable agencies before and during construction.</p>	<ul style="list-style-type: none"> <li>• Include mitigation measure in construction contractor specifications.</li> <li>• Retain copies of all environmental site assessments in the project file.</li> </ul>	<p>The City; Construction Contractor</p>	<p>Before Construction</p>

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
<p><b>HAZ-2:</b> If the site assessments determine that the site has contaminated soil and/or groundwater, a Soil and Groundwater Management Plan shall be prepared that specifies the method for handling and disposing of contaminated soil and groundwater prior to demolition, excavation, and construction activities. The City shall be responsible for ensuring implementation of the Plan in compliance with applicable regulations.</p>	<ul style="list-style-type: none"> <li>• Include mitigation measure in construction contractor specifications.</li> <li>• Retain copies of Soil and Groundwater Management Plan in the project file.</li> <li>• Perform site inspections to verify contractor compliance with hazardous materials.</li> <li>• Retain inspection forms in the project file.</li> </ul>	<p>The City; Construction Contractor</p>	<p>Before and During Construction</p>
<p><b>HAZ-3:</b> In conjunction with <b>Mitigation Measure TR-1</b>, prior to initiating construction of the transmission main within roadway rights-of-way, the City shall prepare and implement a Traffic Control Plan that contains comprehensive strategies for maintaining emergency access. Strategies shall include, but are not limited to, maintaining steel trench plates at the construction sites to restore access across open trenches and identification of alternate routing around construction zones. In addition, police, fire, and other emergency service providers shall be notified of the timing, location, and duration of the construction activities and the location of detours and lane closures. The City shall ensure that the Traffic Control Plan and other construction activities are consistent with the Los Angeles County Operational Area Emergency Response Plan.</p>	<ul style="list-style-type: none"> <li>• Include mitigation measure in construction contractor specifications.</li> <li>• Retain a qualified consultant to prepare a Traffic Control Plan that is consistent with the Los Angeles County Operational Area Emergency Response Plan.</li> <li>• Retain copies of written notifications in the project file.</li> <li>• Retain copies of the Traffic Control Plan in the project file.</li> </ul>	<p>The City; Construction Contractor</p>	<p>Before Construction</p>
<p><b>Noise</b></p>			
<p><b>NOISE-1:</b> Prior to construction, the City of Beverly Hills shall ensure that the contractor specifications stipulate that:</p> <ul style="list-style-type: none"> <li>• All construction equipment, fixed or mobile, is equipped with properly operating and maintained mufflers and other state-required noise attenuation devices capable of up to a 5 dBA reduction.</li> <li>• When feasible, construction haul routes shall avoid noise-sensitive uses (e.g., residences, convalescent homes).</li> <li>• During construction, stationary construction equipment shall be placed such that emitted noise is directed away from the nearest noise-sensitive receptors.</li> </ul> <p>The project shall provide noise blanket/temporary noise barriers rated for up to a 10 dBA reduction between the active areas and surrounding sensitive uses.</p>	<ul style="list-style-type: none"> <li>• Include mitigation measure in construction contractor specifications.</li> <li>• Retain a qualified construction monitor to conduct routine inspections of noise reduction measures during project construction.</li> <li>• Maintain written inspection records in the project file to verify compliance.</li> </ul>	<p>The City; Construction Contractor</p>	<p>Before Construction</p>
<p><b>NOISE-2:</b> Throughout project construction and operation, the City of Beverly Hills shall document, investigate, evaluate, and attempt to resolve all project-related noise complaints as soon as possible.</p> <ul style="list-style-type: none"> <li>• The City shall establish and disseminate a 24/7 hotline telephone number for use by the public to report any undesirable project noise conditions. If the telephone number is not staffed 24 hours per day, the City shall include an automatic answering feature with date and time stamp recording to answer calls when the phone is unattended.</li> <li>• The City shall designate a Noise Disturbance Coordinator during construction and permanently once the facility is operational. The Noise Disturbance Coordinator shall assist in resolving noise complaints to minimize impacts while maintaining the objectives of the construction and operation of the facility. The Noise Disturbance Coordinator shall report all noise complaints to the City program manager.</li> </ul>	<ul style="list-style-type: none"> <li>• Include mitigation measure in construction contractor specifications.</li> <li>• Retain a qualified Noise Disturbance Coordinator to implement the mitigation measure.</li> <li>• Maintain written documentation of all noise complaints and the resolution of complaints in the project file.</li> </ul>	<p>The City; Construction Contractor</p>	<p>During and After Construction</p>

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
<ul style="list-style-type: none"> <li>For construction noise complaints received outside of the construction hours and days allowed (Monday through Friday, between the hours of 7:00 a.m. and 8:00 p.m.), the Noise Disturbance Coordinator shall take immediate steps to determine whether project construction is causing the noise and, if so, to reduce the noise level of that activity or take other appropriate action to remedy the complaint as quickly as possible.</li> </ul> <p>For construction activities near local residences, the Noise Disturbance Coordinator shall have the authority to require the installation of a temporary noise barrier to reduce noise impacts to the closest sensitive receptors. The noise barriers shall be tall enough to effectively block sight-lines of the construction to the closest residences. The contractor shall install noise barriers as directed by the Noise Disturbance Coordinator to minimize construction noise and resolve noise complaints.</p>			
<p><b>NOISE-3:</b> Residents of properties shall be offered noise mitigation measures (e.g., hearing protection, sound-proofing, white noise machines, etc.) acceptable to the residents or temporary relocation for the duration of nearby construction that would generate construction noise levels at their property in excess of 45 dBA, Leq during nighttime hours, for the duration of time that 24-hour activity occurs. Based on the analyses presented in this IS/MND, this measure shall apply to residences located within approximately 200 feet of the well installation location and pipeline rehabilitation and main transmission activity (i.e. residences along or near Chariton Street and La Cienega Boulevard).</p>	<ul style="list-style-type: none"> <li>Include mitigation measure in construction contractor specifications.</li> <li>Maintain written documentation of offered noise mitigation measures in the project file.</li> </ul>	The City; Construction Contractor	During Construction
<p><b>NOISE-4:</b> The contractor shall coordinate with any affected schools, institutions of learning, hospitals, or churches regarding construction schedule and the expected level of disturbance. The contractor shall ensure there are no special events or gatherings that would be affected by construction activity before continuing and will notify any affected institution of the anticipated schedule and completion date. In the event of a conflict, the contractor shall limit the use of equipment in an effort to lower noise levels or cease construction completely until the event or gathering has ended.</p>	<ul style="list-style-type: none"> <li>Include mitigation measure in construction contractor specifications.</li> <li>Maintain written documentation of all construction coordination in the project file.</li> </ul>	The City; Construction Contractor	Before and During Construction
<p><b>NOISE-5:</b> The operation of construction equipment that generates high levels of vibration, such as large bulldozers and loaded trucks, shall be prohibited within 45 feet of existing residential structures. Instead, small construction equipment such as small rubber tired bulldozers, small rubber tired excavator, etc., not exceeding 150 horsepower shall be used within this area during demolition, grading, and excavation operations.</p>	<ul style="list-style-type: none"> <li>Include mitigation measure in construction contractor specifications.</li> <li>Retain a qualified construction monitor to conduct routine inspections of vibration reduction measures during project construction.</li> <li>Retain documentation required by the mitigation measure.</li> <li>Maintain written inspection records in the project file to verify compliance.</li> </ul>	The City; Construction Contractor	During Construction

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
<b>Transportation</b>			
<p><b>TR-1:</b> Prior to the start of construction of the project, the City shall require the construction contractor to prepare a Traffic Control Plan. The Traffic Control Plan will be separated into two different sections: the first section being for construction management within the Well Site and surrounding local roadways; and second, for construction management in areas located along the proposed transmission main rehabilitation areas and proposed new transmission main areas.</p> <p>The Traffic Control Plan will show all signage, striping, delineated detours, flagging operations and any other devices that will be used during construction to guide motorists, bicyclists, and pedestrians safely through the construction area and allow for adequate access and circulation to the satisfaction of the City of Los Angeles, City of Beverly Hills, Los Angeles County, Metro, and Caltrans, as applicable. The Traffic Control Plan shall be prepared in accordance with the City of Los Angeles and the City of Beverly Hills' traffic control guidelines and will be prepared to ensure that access will be maintained to individual properties, that emergency access will not be restricted, and that public transit will not be significantly disrupted. The Traffic Control Plan will ensure that written notices are provided to affected property owners and that detours or alternative routes are provided for public transit, bicyclists using on-street bicycle lanes, and pedestrians using adjacent sidewalks.</p>	<ul style="list-style-type: none"> <li>• Include mitigation measure in construction contractor specifications.</li> <li>• Retain copies of all correspondence with the City of Los Angeles and the City of Beverly Hills in the project file.</li> <li>• Retain copies of the Traffic Control/Traffic Management Plan in the project file.</li> <li>• Retain a qualified construction monitor to conduct routine inspections of traffic control measures during project construction.</li> <li>• Maintain a record of collected information and written notifications in the project file.</li> <li>• Maintain written inspection records in the project file to verify compliance.</li> </ul>	<p>The City; Construction Contractor</p>	<p>Before and During Construction</p>