

# EXECUTIVE SUMMARY

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## ES.1 Introduction

The Los Angeles County Flood Control District (LACFCD) has prepared this Draft Program Environmental Impact Report (Draft PEIR) to provide the public and responsible and trustee agencies with information about the potential effects, both beneficial and adverse, on the local and regional environment associated with implementation of the Enhanced Watershed Management Programs (proposed program). This Draft PEIR has been prepared pursuant to the California Environmental Quality Act (CEQA) of 1970 (amended), codified at California Public Resources Code Sections 21000 et. seq., and the CEQA Guidelines in the Code of Regulations, Title 14, Division 6, Chapter 3.

This document is being circulated to local, state and federal agencies, and to interested organizations and individuals who may wish to review and comment on the Draft PEIR. Publication of this Draft PEIR marks the beginning of a 45-day public review period, during which written comments may be directed to the address below. Comments on the project should be directed to:

Gregg BeGell, P.E.  
County of Los Angeles Department of Public Works  
Project Management Division II  
900 South Fremont Avenue, 5<sup>th</sup> Floor  
Alhambra, CA 91803  
[gbegell@dpw.lacounty.gov](mailto:gbegell@dpw.lacounty.gov)

## ES.2 Background

The Los Angeles County Flood Control District (LACFCD) was created in 1915 when the State Legislature adopted the Los Angeles County Flood Control Act to provide flood risk management, water conservation, and recreation and aesthetic enhancement within its boundaries. The LACFCD owns and maintains a broad network of flood control facilities that convey stormwater to the local rivers and ultimately to the ocean. The LACFCD is governed as a separate entity by the County of Los Angeles Board of Supervisors, and is operated by the County's Department of Public Works. The LACFCD, the County of Los Angeles, and 84 incorporated cities within Los Angeles County (collectively referred to as Permittees) are covered under a Municipal Separate Storm Sewer System (MS4) Permit (Order No. R4-2012-0175; National Pollutant Discharge Elimination System [NPDES] Permit No. CAS004001) for the discharge of urban runoff to waters of the United States. The purpose of the MS4 Permit is to achieve and

maintain water quality objectives to protect beneficial uses of the receiving waters in the Los Angeles region. Each of the Permittees identified in the MS4 permit is responsible for meeting the conditions of the permit for MS4 discharges occurring within their jurisdiction.

The 2012 MS4 Permit for Los Angeles County gives Permittees the option of implementing an innovative approach to Permit compliance through development of an Enhanced Watershed Management Program (EWMP). The EWMPs will identify potential and priority structural and non-structural Best Management Practices (BMPs) within the region's stormwater collection system to improve runoff water quality. The LACFCD, along with participating Permittees, has opted to exercise this option and has submitted to the LARWQCB 12 separate Notices of Intent (NOIs) for the development of EWMPs within 12 distinct watershed groups (refer to **Figure 1-1**). Implementation of the EMWPs would be the responsibility of each Permittee and would occur following approval of the EWMPs by the LARWQCB.

The LACFCD, as a regional agency, is a member of each of the 12 EWMP working groups, and as such provides a commonality within each EWMP group. However, LACFCD does not have a special status or authority designated by the MS4 Permit over any of the other Permittees. The LACFCD will be working with the applicable Permittees in all 12 EWMP watersheds as an equal partner to identify the types and locations of BMPs needed to achieve permit compliance within each watershed.

The timeline identified in the MS4 Permit requires that Permittees submit the EWMP to the LARWQCB by June 28, 2015, in order to be in compliance with the permit conditions. The LACFCD recognizes that implementation of the EWMPs may potentially result in changes to environmental conditions. As a result, the LACFCD has prepared this Program Environmental Impact Report (PEIR) in compliance with the California Environmental Quality Act (CEQA) to provide the public and the responsible and trustee agencies with information about the potential effects on the local and regional environment associated with implementation of the EWMPs. The LACFCD will submit the PEIR to its governing body, the Los Angeles County Board of Supervisors, for approval prior to submittal of the EWMPs. The EWMPs will be submitted by each EWMP to the LARWQCB.

This PEIR describes and evaluates each of the EWMPs being prepared by the Permittees collectively. The discretionary action prompting the need for CEQA compliance is the submittal of the completed EWMPs to the LARWQCB. The EWMPs will identify management strategies including hundreds of structural Best Management Practices (BMPs) that may be designed and implemented by the Permittees to meet permit compliance objectives. A few of the BMPs are currently well defined but most are yet to be fully developed under the EWMPs. A set of priority BMPs will be detailed in each of the EWMPs; these are being developed in parallel with the PEIR. The PEIR describes the details that are available for each of the EWMPs currently under preparation by the EWMP working groups.

The PEIR analysis is not intended to focus on the site-specific construction and operation details of each management strategy and project included in the EWMP. Rather, this PEIR serves as a first-tier environmental document that focuses on the effects of implementing the EWMPs to

reduce urban runoff pollution. The analysis assesses worst case situations where construction or operation of projects may significantly impact environmental resources. The analysis outlines mitigation strategies to be followed by implementing agencies to avoid or minimize impacts wherever feasible.

LACFCD is the CEQA Lead Agency for this PEIR. This PEIR can be used by the LACFCD or other Permittees to streamline environmental review of individual EWMP projects. As individual projects identified in the EWMPs are fully developed, the implementing agency (i.e., the Permittee responsible for implementing the project) will conduct CEQA analysis for individual projects as appropriate or may determine that no additional CEQA analysis is required or that a project is exempt from CEQA.

### **ES.3 Project Objectives**

The primary goals and objectives of the EWMPs are:

- To collaborate among agencies (Permittee jurisdictions) across the watershed to promote more cost-effective and multi-beneficial water quality improvement projects to comply with the MS4 Permit.
- To develop watershed-wide EWMPs that will, once implemented, remove or reduce pollutants from dry- and wet-weather urban runoff in a cost-effective manner.
- To reduce the impact of stormwater and non-stormwater on receiving water quality.

### **ES.4 Project Description**

The 12 EWMPs will vary for each watershed group, but will generally provide the opportunity for Permittees to customize their stormwater programs to achieve compliance with applicable receiving water limitations (RWLs) and water-quality-based effluent limits (WQBELs) in accordance with the MS4 Permit through implementation of stormwater best management practices (BMPs) or watershed control measures. BMPs vary in function and type, with each BMP providing unique design characteristics and benefits from implementation. The overarching goal of BMPs in the EWMP is to reduce the impact of stormwater and non-stormwater on receiving water quality and address the water quality priorities as defined by the MS4 Permit. The development of each EWMP will involve the evaluation and selection of multiple BMP types, including nonstructural (institutional) and distributed, centralized, and regional structural watershed control measures, that will be implemented to meet compliance goals and strategies under the 2012 MS4 Permit. The LACFCD has limited jurisdictional authority for ordinance and code enactment or enforcement and therefore is limited in nonstructural BMPs to education and outreach measures. The structural watershed control measures that will be implemented by the LACFCD will be multi-benefit stormwater projects that emphasize flood risk mitigation and water conservation and supply.

The LACFCD has a vested interest in increasing opportunities for stormwater capture and groundwater recharge as a means of assisting local water supply augmentation. The LACFCD will be working with the applicable Permittees and other stakeholders in all 12 EWMP

watersheds to develop such projects. The EWMPs will be implemented by the Permittees that have jurisdiction within each EWMP area. The implementing agencies will be responsible for the contents of the EWMPs affecting their jurisdictions and for implementing the projects developed by the EWMPs..

Structural control measures are constructed BMPs that reduce the impact of stormwater and non-stormwater on receiving water quality. They are broken into three categories:

- ***Distributed Structural BMPs***, which treat runoff close to the source and are typically implemented at a single- or few-parcel level (e.g., facilities typically serving a contributing area less than one acre).
- ***Centralized Structural BMPs***, which treat runoff from a contributing area of multiple parcels (e.g., facilities typically serving a contributing area on the order of tens or hundreds of acres or larger).
- ***Regional Structural BMPs***, which are meant to retain the 85th percentile storm over 24 hours from a contributing area. Generally, the 85<sup>th</sup> percentile storm is approximately 0.75 inches over 24 hours

Whether distributed, centralized, or regional, the major structural BMP functions are infiltration, treatment, and storage, which may be used individually or combination:

- ***Infiltration***, where runoff is directed to percolate into the underlying soils. Infiltration generally reduces the volume of runoff and increases groundwater recharge.
- ***Treatment***, where pollutants are removed through various unit processes, including filtration, settling, sedimentation, sorption, straining, and biological or chemical transformations.
- ***Storage***, where runoff is captured, stored (detained), and slowly released into downstream waters. Storage can reduce the peak flow rate from a site, but does not directly reduce runoff volume.

The types of structural BMPs to be implemented will vary between EWMPs, but most EMWPs will include a variety of distributed, centralized, and regional BMPs.

These are policies, actions, and activities which are intended to minimize or eliminate pollutant sources. Most institutional BMPs are implemented to meet Minimum Control Measure (MCM) requirements in the MS4 permit; MCMs are considered a subset of institutional BMPs. These BMPs are not constructed, but may have costs associated with the procurement and installation of items such as signage or spill response kits

## ES.5 Project Alternatives

An EIR must describe a range of reasonable alternatives to the proposed project or alternative project locations that could feasibly attain most of the basic project objectives and would avoid or substantially lessen any of the significant environmental impacts to the proposed project. The

alternatives analysis must include the “No Project Alternative” as a point of comparison. The No Project Alternative includes existing conditions and reasonably foreseeable future conditions that would exist if the proposed project were not approved (CEQA Guidelines §15126.6).

## ES.6 Summary of Impacts

**Table ES-1**, at the end of this chapter, presents a summary of the impacts and mitigation measures identified for the proposed project. The complete impact statements and mitigation measures are presented in Chapter 3. The level of significance for each impact was determined using significance criteria (thresholds) developed for each category of impacts; these criteria are presented in the appropriate sections of Chapter 3. Significant impacts are those adverse environmental impacts that meet or exceed the significance thresholds; less-than-significant impacts would not exceed the thresholds. Table ES-1 indicates the measures that will avoid, minimize, or otherwise reduce significant impacts to a less-than-significant level if implemented by the Permittees.

## ES.7 Areas of Controversy

Several comment letters from agency and public comments were received during the scoping period. Public comments received are provided in Appendix A of this PEIR. Some of the comments from non-governmental organizations and the public expressed concerns regarding the lack of project-specific details provided in the NOP for individual BMPs. Several comments were received questioning the funding strategies to be employed by Permittees. The full list of comments highlighting areas of potential controversy received during the public scoping period is included in Appendix A.

## ES.8 Issues to be Resolved

Section 15123(b)(3) of the *CEQA Guidelines* requires that an EIR contain issues to be resolved, which includes the choice among alternatives and whether or how to mitigate significant impacts. The following major issues are to be resolved:

- Determine whether the PEIR adequately describes the environmental impacts of the proposed program;
- Choose among alternatives;
- Determine whether the recommended mitigation measures should be adopted or modified; and
- Determine whether additional mitigation measures need to be applied to the project.

## ES.9 Organization of this PEIR

This Draft PEIR is organized into the following chapters and appendices:

**Executive Summary.** This chapter summarizes the contents of the Draft PEIR.

**Chapter 1, Introduction and Project Background.** This chapter discusses the CEQA process and the purpose of the PEIR and provides background info on the proposed project.

**Chapter 2, Project Description.** This chapter provides an overview of the proposed program, describes the need for and objectives of the proposed program, and provides detail on the characteristics of the proposed program.

**Chapter 3, Environmental Setting, Impacts and Mitigation Measures.** This chapter describes the environmental setting and identifies impacts of the proposed program for each of the following environmental resource areas; Aesthetics; Air Quality; Biological Resources; Cultural Resources; Geology and Soils / Mineral Resources; Greenhouse Gas Emissions; Hazards and Hazardous Waste; Hydrology and Water Quality; Land Use and Planning / Agriculture; Noise; Population and Housing; Public Services / Recreation; Transportation and Circulation; and Utilities and Service Systems. Measures to mitigate the impacts of the proposed program are presented for each resource area.

**Chapter 4, Cumulative Impacts.** This chapter analyzes the potential for the proposed program to have significant cumulative effects when combined with other past, present, and reasonably foreseeable future projects in each resource area's cumulative geographic scope.

**Chapter 5, Growth Impacts.** This chapter identifies areas of the EIR where significant environmental effects that cannot be avoided would occur, if any. It will also include an analysis of growth inducement impacts that would be provided by the program.

**Chapter 6, Alternatives.** This chapter presents an overview of the alternatives development process and describes the alternatives to the proposed program that were considered.

**Chapter 7, Organizations and Persons Contacted.**

**Chapter 8, Report Preparers.** This chapter identifies authors involved in preparing this Draft DEIR, including persons and organizations consulted.

**Chapter 9, References.**

**TABLE ES-1  
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE ENHANCED WATERSHED MANAGEMENT PROGRAMS**

| <b>Impacts</b>  | <b>Mitigation Measures</b>   | <b>Significance before Mitigation</b> | <b>Significance if Mitigation is Implemented</b>                                    |
|---|--|---------------------------------------|---|
| <b>Aesthetics</b>   |  |                                       |   |
| <b>3.1-1:</b> The proposed program could create a substantial adverse effect on a scenic vista.   | <b>AES-1:</b> Aboveground structures shall be designed to be consistent with local zoning codes and applicable design guidelines and to minimize features that contrast with neighboring development.  | Significant                           | Less than significant   |
| <b>3.1-2:</b> The proposed program could substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. | Implementation of <b>AES-1</b>   | Significant                           | Less than significant   |
| <b>3.1-3:</b> The proposed program could substantially degrade the existing visual character or quality of the site and its surroundings.   | Implementation of <b>AES-1</b><br><b>AES-2:</b> Implementing agencies shall develop BMP maintenance plans that are approved concurrently with each structural BMP approval. The maintenance plans must include measures to ensure functionality of the structural BMPs for the life of the BMP. These plans may include general maintenance guidelines that apply to a number of smaller distributed BMPs.   | Significant                           | Less than significant   |
| <b>3.1-4:</b> The proposed program could create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.                                   | None required  | Less than significant                 | Not applicable  |
| <b>Air Quality</b>  |  |                                       |   |
| <b>3.2-1:</b> The project could conflict with or obstruct implementation of the applicable air quality plan.  | None required  | Less than significant                 | Not applicable  |
| <b>3.2-2:</b> The project could violate any air quality standard or contribute substantially to an existing or projected air quality violation.   | <b>AIR-1:</b> Implementing agencies shall require for large Regional or Centralized BMPs the use of low-emission equipment meeting Tier II emissions standards at a minimum and Tier III and IV emissions standards where available as CARB-required emissions technologies become readily available to contractors in the region<br><b>AIR-2:</b> For large construction efforts that may result in significant air emissions, implementing agencies shall encourage contractors to use lower-emission equipment through the bidding process where appropriate. | Significant                           | Significant and unavoidable for construction; Less than significant for operations. |

**TABLE ES-1 (continued)**  
**SUMMARY OF IMPACTS AND MITIGATION MEASURES**

| Impacts  | Mitigation Measures  | Significance before Mitigation | Significance if Mitigation is Implemented   |
|--|--|--------------------------------|---|
| <b>3.2-3:</b> The program could result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).         | Implementation of <b>AIR-1</b> and <b>AIR-2</b>  | Significant                    | Significant and unavoidable for construction; less than significant for operations. |
| <b>3.2-4:</b> The project could expose sensitive receptors to substantial pollutant concentrations.  | <b>AIR-3:</b> For large construction efforts associated with Regional or Centralized BMPs, implementing agencies shall conduct a project-specific LST analysis where necessary to determine local health impacts to neighboring land uses. Where it is determined that construction emissions would exceed the applicable LSTs or the most stringent applicable federal or state ambient air quality standards, the structural BMP project shall reduce its daily construction intensity (e.g., reducing the amount of equipment used daily, reducing the amount of soil graded/excavated daily) to a level where the structural BMP project's construction emissions would no longer exceed SCAQMD's LSTs or result in pollutant emissions that would cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards. | Significant                    | Less than significant   |
| <b>3.2-5:</b> The proposed program could create objectionable odors affecting a substantial number of people.  | <b>AIR-4:</b> During planning of structural BMPs, implementing agencies shall assess the potential for nuisance odors to affect a substantial number of people. BMPs that minimize odors shall be considered the priority when in close proximity to sensitive receptors.  | Significant                    | Less than significant   |
| <b>Biological Resources</b>  |  |                                |   |
| <b>3.3-1:</b> The proposed project could have a substantial adverse effect, either directly or through habitat modifications, on any sensitive species identified as special-status in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. | <b>BIO-1:</b> Prior to approving a Regional or Centralized BMP., the Permittee shall conduct an evaluation of the suitability of the BMP location. Appropriate BMP sites should avoid impacting large areas of native habitats including upland woodlands and riparian forests that support sensitive species to the extent feasible. The evaluation shall include an assessment of potential downstream impacts resulting from flow diversions.<br><br><b>BIO-2:</b> Prior to ground disturbing activities in areas that could support sensitive biological resources, a habitat assessment shall be conducted by a qualified biologist to determine the potential for special-status wildlife species to occur within  | Significant                    | Less than significant   |

**TABLE ES-1 (continued)**  
**SUMMARY OF IMPACTS AND MITIGATION MEASURES**

| Impacts | Mitigation Measures  | Significance before Mitigation | Significance if Mitigation is Implemented |
|---------|--|--------------------------------|---|
|         | <p>affected areas, including areas directly or indirectly impacted by construction or operation of the BMPs.</p> <p><b>BIO-3:</b> If a special-status wildlife species is determined to be present or potentially present within the limits of construction activities, a qualified biologist shall conduct pre-construction surveys of proposed work zones and within an appropriately sized buffer around each area as determined by a qualified biologist within 14 days prior to ground disturbing activities. Any potential habitat capable of supporting a special-status wildlife species shall be flagged for avoidance if feasible.</p> <p><b>BIO-4:</b> If avoidance of special-status species or sensitive habitats that could support special-status species (including, but not limited to, critical habitat, riparian habitat, and jurisdictional wetlands/waters) is not feasible, the Permittee shall consult with the appropriate regulating agency (USACE/USFWS or CDFW) to determine a strategy for compliance with the Endangered Species Act, California Fish and Game Code, and other regulations protecting special-status species and sensitive habitats. The Permittee shall identify appropriate impact minimization measures and compensation for permanent impacts to sensitive habitats and species in consultation with regulatory agencies. Construction of the project will not begin until the appropriate permits from the regulatory agencies are approved.</p> <p><b>BIO-5:</b> If construction and vegetation removal is proposed between February 1 and August 31, a qualified biologist shall conduct a pre-construction survey for breeding and nesting birds and raptors within 500-feet of the construction limits to determine and map the location and extent of breeding birds that could be affected by the project. Active nest sites located during the pre-construction surveys shall be avoided until the adults and young are no longer reliant on the nest site for survival as determined by a qualified biologist.</p> <p><b>BIO-6:</b> All construction areas, staging areas, and right-of-ways shall be staked, flagged, fenced, or otherwise clearly delineated to restrict the limits of construction to the minimum necessary near areas that may support special-status wildlife species as determined by a qualified biologist.</p> <p><b>BIO-7:</b> Prior to construction in areas that could support special status plants, a qualified botanist shall conduct a pre-</p> |                                |   |

**TABLE ES-1 (continued)  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

| Impacts   | Mitigation Measures   | Significance before Mitigation | Significance if Mitigation is Implemented |
|---|---|--------------------------------|---|
| <p><b>3.3-2:</b> The proposed project could have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS.</p>   | <p>Implement <b>BIO-1</b> through <b>BIO-8</b></p>  | <p>Significant</p>             | <p>Less than significant</p>              |
| <p><b>3.3-3:</b> The proposed project could have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.</p> | <p>Implement <b>BIO-1</b> through <b>BIO-8</b></p> <p><b>BIO-9:</b> Prior to construction, a qualified wetland delineator shall be retained to conduct a formal wetland delineation in areas where potential jurisdictional resources (i.e., wetlands or drainages) subject to the jurisdiction of USACE, RWQCB, and CDFW, may be affected by the project. If jurisdictional resources are identified in the EWMP area and would be directly or indirectly impacted by individual projects, the qualified wetland delineator shall prepare a jurisdictional delineation report suitable for submittal to USACE, RWQCB, and CDFW for purposes of obtaining the appropriate permits. Habitat mitigation and compensation requirements shall be implemented prior to construction in accordance with Mitigation Measure BIO-4.</p> | <p>Significant</p>             | <p>Less than significant</p>              |
| <p><b>3.3-4:</b> The proposed project could interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the</p>   | <p>None required</p>  | <p>Less than significant</p>   | <p>Not applicable</p>                     |

**TABLE ES-1 (continued)  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

| Impacts  | Mitigation Measures   | Significance before Mitigation | Significance if Mitigation is Implemented |
|--|---|--------------------------------|---|
| use of native wildlife nursery sites.  |   |                                |   |
| <b>3.3-5:</b> The proposed project could conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.  | <b>BIO-10:</b> Oak trees and other protected trees shall be avoided to the extent feasible. If trees may be impacted by project construction, a certified arborist shall conduct a tree inventory of the construction impact area. If any oak trees or other protected trees will be impacted by BMP construction, the implementing agency shall obtain any required County or City permits.  | Significant                    | Less than significant                     |
| <b>3.3-6:</b> The proposed project could conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. | None required   | Less than significant          | Not applicable                            |
| Cultural Resources   |   |                                |   |
| <b>3.4-1:</b> The proposed program could cause a substantial adverse change in the significance of an historical resource as defined in §15064.5.  | <p><b>CUL-1:</b> For individual EWMP projects that could impact buildings or structures (including infrastructure) 45 years old or older, implementing agencies shall ensure that a historic built environment survey is conducted or supervised by a qualified historian or architectural historian meeting the Secretary of the Interior's Professional Qualification Standards for Architectural History. Historic built environment resources shall be evaluated for their eligibility for listing in the CRHR or local register prior to the implementing agency's approval of project plans. If eligible resources that would be considered historical resources under CEQA are identified, demolition or substantial alteration of such resources shall be avoided. If avoidance is determined to be infeasible, the implementing agency shall require the preparation of a treatment plan to include, but not be limited to, photo-documentation and public interpretation of the resource. The plan will be submitted to the implementing agency for review and approval prior to implementation.</p> <p><b>CUL-2:</b> Implementing agencies shall ensure that individual EWMP projects that require ground disturbance shall be subject to a Phase I cultural resources inventory on a project-specific basis prior to the implementing agency's approval of project plans. The study shall be conducted or supervised by a qualified archaeologist, defined as an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for Archaeology, and shall be conducted in</p> | Significant                    | Significant and Unavoidable               |

**TABLE ES-1 (continued)  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

| Impacts | Mitigation Measures  | Significance before Mitigation | Significance if Mitigation is Implemented |
|---------|--|--------------------------------|---|
|         | <p>consultation with the local Native American representatives expressing interest. The cultural resources inventory shall include a cultural resources records search to be conducted at the South Central Coastal Information Center; scoping with the NAHC and with interested Native Americans identified by the NAHC; a pedestrian archaeological survey where deemed appropriate by the qualified archaeologist; and formal recordation of all identified archaeological resources on California Department of Parks and Recreation 523 forms and significance evaluation of such resources presented in a technical report following the guidelines in <i>Archaeological Resource Management Reports (ARMR): Recommended Contents and Format</i>, Department of Parks and Recreation, Office of Historic Preservation, State of California, 1990.</p> <p>If potentially significant archaeological resources are encountered during the survey, the implementing agency shall require that the resources are evaluated by the qualified archaeologist for their eligibility for listing in the CRHR and for significance as a historical resource or unique archaeological resource per <i>CEQA Guidelines</i> Section 15064.5.</p> <p>Recommendations shall be made for treatment of these resources if found to be significant, in consultation with the implementing agency and the appropriate Native American groups for prehistoric resources. Per <i>CEQA Guidelines</i> Section 15126.4(b)(3), preservation in place shall be the preferred manner of mitigation to avoid impacts to archaeological resources qualifying as historical resources. Methods of avoidance may include, but shall not be limited to, project re-route or re-design, project cancellation, or identification of protection measures such as capping or fencing. Consistent with <i>CEQA Guidelines</i> Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures, which may include data recovery or other appropriate measures, in consultation with the implementing agency, and any local Native American representatives expressing interest in prehistoric or tribal resources. If an archaeological site does not qualify as an historical resource but meets the criteria for a unique archaeological resource as defined in Section 21083.2, then the site shall be treated in accordance with the provisions of Section 21083.2.</p> <p><b>CUL-3:</b> The implementing agency shall retain archaeological</p> |                                |   |

**TABLE ES-1 (continued)**  
**SUMMARY OF IMPACTS AND MITIGATION MEASURES**

| Impacts  | Mitigation Measures  | Significance before Mitigation | Significance if Mitigation is Implemented |
|--|--|--------------------------------|---|
| <p><b>3.4-2:</b> The program could cause a substantial adverse change in the significance of unique archaeological resources as defined in §15064.5.</p> | <p>Implementation of <b>CUL-2</b> through <b>CUL-4</b></p> | <p>Significant</p>             | <p>Less than significant</p>              |

**TABLE ES-1 (continued)  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

| Impacts  | Mitigation Measures  | Significance before Mitigation | Significance if Mitigation is Implemented |
|--|--|--------------------------------|---|
| <p><b>3.4-3:</b> The program could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.</p>  | <p><b>CUL-5:</b> For individual structural BMP projects that require ground disturbance, the implementing agency shall evaluate the sensitivity of the project site for paleontological resources. If deemed necessary, the implementing agency shall retain a qualified paleontologist to evaluate the project and provide recommendations regarding additional work, potentially including testing or construction monitoring.</p> <p><b>CUL-6:</b> In the event that paleontological resources are discovered during construction, the implementing agency shall notify a qualified paleontologist. The paleontologist will evaluate the potential resource, assess the significance of the find, and recommend further actions to protect the resource.</p>                                    | Significant                    | Less than significant                     |
| <p><b>3.4-4:</b> The program could disturb any human remains, including those interred outside of a formal cemetery.</p>   | <p><b>CUL-7:</b> The implementing agency shall require that, if human remains are uncovered during project construction, work in the vicinity of the find shall cease and the County Coroner shall be contacted to evaluate the remains, following the procedures and protocols set forth in Section 15064.5 (e)(1) of the CEQA Guidelines. If the County Coroner determines that the remains are Native American, the Coroner will contact the Native American Heritage Commission, in accordance with Health and Safety Code Section 7050.5, subdivision (c), and Public Resources Code 5097.98 (as amended by AB 2641). The NAHC will then designate a Most Likely Descendant of the deceased Native American, who will engage in consultation to determine the disposition of the remains.</p> | Significant                    | Less than significant                     |
| <p>Geologic and Mineral Resources</p>  |  |                                |   |
| <p><b>3.5-1:</b> The proposed program could locate new facilities in areas susceptible to seismic impacts such as (1) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, (2) strong seismic groundshaking, or (3) seismically induced liquefaction or landslides, which could expose people, structures, or habitat to potential risk of loss, damage, injury, or death.</p> | None required  | Less than significant          | Not applicable                            |

**TABLE ES-1 (continued)  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

| <b>Impacts</b>  | <b>Mitigation Measures</b>  | <b>Significance before Mitigation</b> | <b>Significance if Mitigation is Implemented</b> |
|---|---|---------------------------------------|--|
| <b>3.5-2:</b> The proposed program could result in substantial soil erosion or the loss of topsoil.   | None required   | Less than significant                 | Not applicable                                   |
| <b>3.5-3:</b> The proposed program could be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the program, and potentially result in on-site or off-site non-seismically induced geologic hazards such as landslides, lateral spreading, subsidence, collapse or sinkholes, settlement, or slope failure. | <b>GEO-1:</b> Prior to approval of infiltration BMPs, implementing agencies shall conduct a geotechnical investigation of each infiltration BMP site to evaluate infiltration suitability. If infiltration rates are sufficient to accommodate an infiltration BMP, the geotechnical investigation shall recommend design measures necessary to prevent excessive lateral spreading that could destabilize neighboring structures. Implementing agencies shall implement these measures in project designs.   | Significant                           | Less than significant                            |
| <b>3.5-4:</b> The proposed program could be located on expansive soil as defined in 24 CCR 1803.5.3 of the California Building Code (2013), creating substantial risks to life or structures.   | None required   | Less than significant                 | Not applicable                                   |
| <b>3.5-5:</b> The proposed program could have soils incapable of adequately supporting the use of a septic tank or alternative wastewater treatment systems where sewers are not available for the disposal of wastewater.  | None required   | Less than significant                 | Not applicable                                   |
| <b>3.5-6:</b> The proposed program could result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state or a locally important mineral resource recovery site delineated on a local General Plan, Specific Plan, or other land use plan.  | None required   | Less than significant                 | Not applicable                                   |
| <b>Cumulative Impacts</b>   | <b>GEO-2:</b> Prior to installing BMPs designed to recharge local groundwater supplies, the Implementing Agency shall notify local groundwater managers including the Upper Los Angeles River Area Water Master, the Water Replenishment District of Southern California, or the San Gabriel Water Master as well as local water producers such as local municipalities and water companies. The Implementing Agency shall coordinate BMP siting efforts with groundwater managers and producers to mitigate high groundwater levels while increasing local water supplies. | Significant                           | Less than significant                            |
| <b>Greenhouse Gas Emissions</b>   |   |                                       |  |

**TABLE ES-1 (continued)  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

| Impacts   | Mitigation Measures   | Significance before Mitigation | Significance if Mitigation is Implemented |
|---|---|--------------------------------|---|
| <p><b>3.6-1:</b> The proposed program could generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.</p>   | None required   | Less than significant          | Not applicable                            |
| <p><b>3.6-2:</b> The proposed program could conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.</p>   | None required   | Less than significant          | Not applicable                            |
| Hazards and Hazardous Materials   |   |                                |   |
| <p><b>3.7-1:</b> The proposed program would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or the accidental release during construction and maintenance activities.</p> | None required   | Less than significant          | Not applicable                            |
| <p><b>3.7-2:</b> The proposed program could create a significant hazard to the public or the environment through the accumulation of potentially hazardous materials into BMPs.</p>   | <p><b>HAZ-1:</b> Implementing agencies shall prepare and implement maintenance practices that include periodic removal and replacement of surface soils and media that may accumulate constituents that could result in further migration of constituents to sub-soils and groundwater. A BMP Maintenance Plan shall be prepared by Implementing Agencies upon approval of the individual BMP projects that identifies the frequency and procedures for removal and/or replacement of accumulated debris, surface soils and/or media (to depth where constituent concentrations do not represent a hazardous conditions and/or have the potential to migrate further and impact groundwater) to avoid accumulation of hazardous concentrations and the potential to migrate further to sub-soils and groundwater. The BMP Maintenance Plan may consist of a general maintenance guideline that applies to several types of smaller distributed BMPs. For smaller distributed BMPs on private property, these plans may consist of a maintenance covenant that includes requirements to avoid the accumulation of hazardous concentrations in these BMPs that may impact underlying sub-soils and groundwater. Structural BMPs shall be designed to prevent migration of constituents that may impact groundwater.</p> | Significant                    | Less than significant                     |
| <p><b>3.7-3:</b> The proposed program could emit hazardous emissions or handle hazardous</p>  | Implementation of <b>HAZ-1</b>  | Less than significant          | Not applicable                            |

**TABLE ES-1 (continued)**  
**SUMMARY OF IMPACTS AND MITIGATION MEASURES**

| Impacts  | Mitigation Measures  | Significance before Mitigation | Significance if Mitigation is Implemented |
|--|--|--------------------------------|---|
| or acutely hazardous materials, substances, or waste within one-quarter mile of an existing school.  | <b>HAZ-2:</b> Prior to the initiation of any construction requiring ground-disturbing activities in areas where hazardous material use or management may have occurred, the implementing agencies shall complete a Phase I Environmental Site Assessment (ESA) in accordance with  | Significant                    | Less than significant                     |
| significant hazard to the public or the environment.   | American Society for Testing and Materials (ASTM) Standard E1527-13 for each construction site. Any recommended follow up sampling (Phase II activities) set forth in the Phase I ESA shall be implemented prior to construction. The results of Phase II studies, if necessary, shall be submitted to the local overseeing agency and any required remediation or further delineation of identified contamination shall be completed prior to commencement of construction. | Significant                    | Less than significant                     |
| <b>3.7-5:</b> For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, for a project within the vicinity of a private airstrip, the project could result in a safety hazard for people residing or working in the project area. | <b>HAZ-3:</b> Implementing Agencies shall require that those BMPs that are within an airport land use plan area are compatible with criteria specified in FAA Advisory Circular No: 150/5200-33B (FAA, 2007). If the proposed BMP is within the minimum separation criteria, the Implementing Agency shall consult with the airport and collaboratively evaluate whether the potential increase in wildlife hazards can be mitigated.  | Significant                    | Less than significant                     |
| <b>3.7-6:</b> The proposed program could impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.  | None required  | Less than significant          | Not applicable                            |
| <b>3.7-7:</b> The proposed program could expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.  | None required  | Less than significant          | Not applicable                            |
| <b>Hydrology and Water Quality</b>   |  |                                |   |
| <b>3.8-1:</b> The proposed project would result in higher groundwater levels and could   | <b>HYDRO-1:</b> Prior to approving an infiltration BMP, the Permittee shall conduct an evaluation of the suitability of the BMP location. Appropriate infiltration BMP sites should avoid  | Significant                    | Less than significant                     |

**TABLE ES-1 (continued)  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

| Impacts  | Mitigation Measures   | Significance before Mitigation | Significance if Mitigation is Implemented |
|--|---|--------------------------------|---|
| potentially affect groundwater quality.  | <p>areas with low permeability where recharge could adversely affect neighboring subsurface infrastructure.</p> <p><b>HYDRO-2:</b> Prior to approving an infiltration BMP, the Permittee shall identify pre-treatment technologies, type, and depth of filtration media; depth to groundwater; and other design considerations necessary to prevent contaminants from impacting groundwater quality. The design shall consider stormwater quality data within the BMP's collection area to assess the need and type of treatment and filtration controls. Local design manuals and ordinances requiring minimum separation distance to groundwater shall also be met as part of the design.</p> <p><b>HYDRO-3:</b> Prior to the installation of an infiltration BMP, the Permittee shall conduct a database review for contaminated groundwater sites within a quarter mile of the proposed infiltration facility. The Permittee shall identify whether any contaminated groundwater plumes are present and whether coordination with the local and state environmental protection overseeing agency and responsible party is warranted prior to final design of infiltration facility.</p> |                                |   |
| <b>3.8-2:</b> The proposed project could substantially alter the existing drainage pattern of a site or area through the alteration of the course of a stream or river, or by other means, in a manner that would result in substantial erosion or siltation on- or off-site.                            | None required   | Less than significant          | Not applicable                            |
| <b>3.8-3:</b> The project could substantially alter the existing drainage pattern of a site or area through the alteration of the course of a stream or river or, by other means, substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. | None required   | Less than significant          | Not applicable                            |
| <b>3.8-4:</b> The proposed project could create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.  | None required   | Less than significant          | Not applicable                            |

**TABLE ES-1 (continued)  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

| <b>Impacts</b>  | <b>Mitigation Measures</b> | <b>Significance before Mitigation</b> | <b>Significance if Mitigation is Implemented</b> |
|---|----------------------------|---------------------------------------|--|
| <b>3.8-5:</b> The project could place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other authoritative flood hazard delineation map.   | None required              | No impact                             | Not applicable                                   |
| <b>3.8-6:</b> The project could place within a 100-year flood hazard area structures that would impede or redirect flood flows.   | None required              | Less than significant                 | Not applicable                                   |
| <b>3.8-7:</b> The proposed project could expose structures to a significant risk of loss, including flooding as a result of the failure of a levee or dam.  | None required              | Less than significant                 | Not applicable                                   |
| <b>3.8-8:</b> The proposed project could place structures in areas subject to inundation by seiche, tsunami, or mudflow.  | None required              | Less than significant                 | Not applicable                                   |
| <b>Land Use and Agriculture</b>   |                            |                                       |  |
| <b>3.9-1:</b> The proposed program could physically divide an established community.  | None required.             | No Impact                             | Not applicable                                   |
| <b>3.9-2:</b> The proposed program could conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the program (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. | None required              | No Impact                             | Not applicable                                   |
| <b>3.9-3:</b> The proposed program could conflict with any applicable habitat conservation plan or natural community conservation plan.   | None required              | No Impact                             | Not applicable                                   |
| <b>3.9-4:</b> The proposed program could convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping  | None required              | No Impact                             | Not applicable                                   |

**TABLE ES-1 (continued)  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

| Impacts  | Mitigation Measures  | Significance before Mitigation | Significance if Mitigation is Implemented  |
|--|--|--------------------------------|--|
| <p>and Monitoring Program of the California Resources Agency, to non-agricultural use. The proposed program could involve other changes in the existing environment which, due to their location or nature, could result in conversion of agricultural land to non-agricultural use or conversion of forest land to non-forest use.</p>  | None required  | No Impact                      | Not applicable   |
| <p><b>3.9-5:</b> The proposed program could conflict with existing zoning for agricultural use, or a Williamson Act contract.</p>  | None required  | No Impact                      | Not applicable   |
| <p><b>3.9-6:</b> The proposed program could conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)). The proposed program could result in the loss of forest land or conversion of forest land to non-forest use.</p> | None required  | No Impact                      | Not applicable   |
| <p><b>Noise</b></p>  | <p><b>NOISE-1:</b> The implementing agencies shall implement the following measures during construction as needed::</p> <ul style="list-style-type: none"> <li>• Include design measures necessary to reduce the construction noise levels where feasible. These measures may include noise barriers, curtains, or shields.</li> <li>• Place noise-generating construction activities (e.g., operation of compressors and generators, cement mixing, general truck idling) as far as possible from the nearest noise-sensitive land uses.</li> <li>• Locate stationary construction noise sources as far from adjacent noise-sensitive receptors as possible.</li> <li>• If construction is to occur near a school, the construction contractor shall coordinate the with school administration in order to limit disturbance to the campus. Efforts to limit construction activities to non-school days shall be encouraged.</li> </ul> | Significant                    | Significant and unavoidable for construction; less than significant for operations |
| <p><b>3.10-1:</b> The proposed program could result in exposure of persons to, or generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.</p>  |  |                                |  |

**TABLE ES-1 (continued)  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

| Impacts   | Mitigation Measures  | Significance before Mitigation | Significance if Mitigation is Implemented |
|---|--|--------------------------------|---|
|   | <ul style="list-style-type: none"> <li>• For the centralized and regional BMP projects located adjacent to noise-sensitive land uses, identify a liaison for these off-site sensitive receptors, such as residents and property owners, to contact with concerns regarding construction noise and vibration. The liaison's telephone number(s) shall be prominently displayed at construction locations.</li> <li>• For the centralized and regional BMP projects located adjacent to noise-sensitive land uses, notify in writing all landowners and occupants of properties adjacent to the construction area of the anticipated construction schedule at least 2 weeks prior to groundbreaking.</li> </ul> <p><b>NOISE-2:</b> All structural BMPs that employ mechanized stationary equipment that generate noise levels shall comply with the applicable noise standards established by the implementing agency with jurisdiction over the structural BMP site. The equipment shall be designed with noise-attenuating features (e.g., enclosures) and/or located at areas (e.g., belowground) where nearby noise-sensitive land uses would not be exposed to a perceptible noise increase in their noise environment.</p> |                                |   |
| <b>3.10-2:</b> The proposed program could result in exposure of persons to, or generation of, excessive groundborne vibration.  | None required  | Less than significant          | Not applicable                            |
| <b>3.10-3:</b> The proposed program could result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.   | Implementation of <b>NOISE-1</b> and <b>NOISE-2</b>  | Significant                    | Less than significant                     |
| <b>3.10-4:</b> The proposed program could result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.   | Implementation of <b>NOISE-1</b>   | Significant                    | Significant and unavoidable               |
| <b>3.10-5:</b> For a project located within an airport land use plan area, or, where such a plan has not been adopted, in an area within 2 miles of a public airport or public use airport, implementation of the proposed program could expose people residing or working in the area to excessive noise | None required  | Less than significant          | Not applicable                            |

**TABLE ES-1 (continued)  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

| <b>Impacts</b>  | <b>Mitigation Measures</b>  | <b>Significance before Mitigation</b> | <b>Significance if Mitigation is Implemented</b> |
|---|---|---------------------------------------|--|
| levels.   |   |                                       |  |
| <b>3.10-6:</b> For a project located in the vicinity of a private airstrip, the proposed program could expose people residing or working in the project area to excessive noise levels.   | None required   | Less than significant                 | Not applicable                                   |
| <b>Population and Housing and Environmental Justice</b>   |   |                                       |  |
| <b>3.11-1:</b> Implementation of the proposed program could induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).  | None required   | No Impact                             | Not applicable                                   |
| <b>3.11-2:</b> Implementation of the proposed program could displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.  | None required   | No Impact                             | Not applicable                                   |
| <b>3.11-3:</b> Implementation of the proposed program could displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.  | None required   | No Impact                             | Not applicable                                   |
| <b>3.11-4:</b> Implementation of the proposed program could affect the health or environment of minority or low income populations disproportionately.  | None required   | Less than significant                 | Not applicable                                   |
| <b>Public Services and Recreation</b>   |   |                                       |  |
| <b>3.12-1:</b> The proposed program could result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. | <b>PS-1:</b> The Permittee implementing the EWMP project shall provide reasonable advance notification to the service providers such as fire, police, local businesses, home owners and residents of adjacent to and within areas potentially affected by the proposed EWMP project about the nature, extent and duration of construction activities. Interim updates should be provided to inform them of the status of the construction activities. | Significant                           | Less than significant                            |

**TABLE ES-1 (continued)**  
**SUMMARY OF IMPACTS AND MITIGATION MEASURES**

| Impacts  | Mitigation Measures  | Significance before Mitigation | Significance if Mitigation is Implemented |
|--|--|--------------------------------|---|
| <p><b>3.12-2:</b> The proposed program could result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection services.</p> | None required  | Less than significant          | Not applicable                            |
| <p><b>3.12-3:</b> The proposed program could result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for schools.</p>  | None required  | Less than significant          | Not applicable                            |
| <p><b>3.12-4:</b> The proposed program could increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.</p>   | None required  | Less than significant          | Not applicable                            |
| <p><b>3.12-5:</b> The proposed program could include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.</p>   | None required  | Less than significant          | Not applicable                            |
| <b>Transportation and Circulation</b>  |  |                                |   |
| <p><b>3.13-1:</b> The proposed program could intermittently and temporarily increase traffic levels and traffic delays due to vehicle trips generated by construction workers and construction vehicles on area roadways.</p>  | <p><b>TRAF-1:</b> For projects that may affect traffic, implementing agencies shall require that contractors prepare a construction traffic control plan. Elements of the plan should include, but are not necessarily limited to, the following:</p> <ul style="list-style-type: none"> <li>• Develop circulation and detour plans to minimize impacts to local street circulation. Use haul routes minimizing truck traffic on local roadways to the extent possible.</li> <li>• To the extent feasible, and as needed to avoid adverse</li> </ul> | Significant                    | Less than significant                     |

**TABLE ES-1 (continued)  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

| Impacts   | Mitigation Measures   | Significance before Mitigation | Significance if Mitigation is Implemented |
|---|---|--------------------------------|---|
|   | <p>impacts on traffic flow, schedule truck trips outside of peak morning and evening commute hours.</p> <ul style="list-style-type: none"> <li>• Install traffic control devices as specified in Caltrans' Manual of Traffic Controls for Construction and Maintenance Work Zones where needed to maintain safe driving conditions. Use flaggers and/or signage to safely direct traffic through construction work zones.</li> <li>• Coordinate with facility owners or administrators of sensitive land uses such as police and fire stations, hospitals, and schools. Provide advance notification to the facility owner or operator of the timing, location, and duration of construction activities.</li> </ul> |                                |   |
| <b>3.13-2:</b> Construction of the proposed program could potentially cause traffic safety hazards for vehicles, bicyclists, and pedestrians on public roadways, and could increase traffic hazards due to possible road wear.  | None required   | Less than significant          | Not applicable                            |
| <b>3.13-3:</b> The proposed program could result in inadequate emergency access during construction.  | None required.  | Less than significant          | Not applicable                            |
| <b>3.13-4:</b> Construction of the proposed program could contribute to cumulative impacts to traffic and transportation (traffic congestion, traffic safety, and emergency vehicle access).  | Implementation of <b>TRAF-1</b>   | Significant                    | Less than significant                     |
| <b>Utilities and Service Systems</b>  |   |                                |   |
| <b>3.14-1:</b> Implementation of the proposed program could exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board or result in the construction of new treatment facilities or expansion of existing facilities if the wastewater treatment provider has inadequate capacity to serve the proposed program. | None required   | Less than significant          | Not applicable                            |
| <b>3.14-2:</b> The proposed program could require or result in the construction of new storm water drainage facilities or expansion   | None required   | Less than significant          | Not applicable                            |

**TABLE ES-1 (continued)  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

| Impacts   | Mitigation Measures   | Significance before Mitigation | Significance if Mitigation is Implemented |
|---|---|--------------------------------|---|
| of existing facilities, the construction of which could cause significant environmental effects.  |   |                                |   |
| <b>3.14-3:</b> The proposed program could require new or expanded water supply resources or entitlements or require or result in the construction of new water facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. | <b>UTIL-1:</b> Prior to approval of BMPs, implementing agencies shall evaluate the potential for impacts to downstream beneficial uses including surface water rights. Implementing agencies shall not approve BMPs that result in preventing access to previously appropriated surface water downstream.   | Significant                    | Less than significant                     |
| <b>3.14-4:</b> The proposed program could be served by a landfill with insufficient permitted capacity to accommodate the project solid waste disposal needs or the project could not comply with federal, state, and local statutes and regulations related to solid waste.            | <b>UTIL-2:</b> Implementing agencies shall encourage construction contractors to recycle construction materials and divert inert solids (asphalt, brick, concrete, dirt, fines, rock, sand, soil, and stone) from disposal in a landfill where feasible. Implementing agencies shall incentivize construction contractors with waste minimization goals in bid specifications where feasible. | Significant                    | Less than significant                     |
| <b>3.14-5:</b> Construction and operation of the proposed program would require additional energy use that could result in wasteful consumption, affect local and regional energy supplies, or conflict with applicable energy efficiency policies or standards.                        | None required   | Less than significant          | Not applicable                            |