San Gabriel Valley Greenway Network Strategic Implementation Plan Findings of Fact in Support of Findings Related to Significant Environmental Impacts

SCH #2022090340

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SECTION 1 Purpose of Findings

The California Environmental Quality Act (CEQA) and the State CEQA Guidelines require a public agency, prior to approving a project, to identify significant impacts of the project and make one or more written findings for each such impact (California Public Resources Code [PRC] Section 21081 and Section 15091). According to Section 21081,

> no public agency shall approve or carry out a project for which an environmental impact report has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless both of the following occur:
>
> (a) The public agency makes one or more of the following possible findings with respect to each significant effect:
>
> > 1. Changes or alterations have been required in, or incorporated into, the project to mitigate or avoid the significant effects on the environment.
> >
> > 2. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
> >
> > 3. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.
>
> (b) With respect to significant effects which were subject to a finding under paragraph (3) of subdivision (a), the public agency finds that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment.

Pursuant to Section 21081.6, public agencies are required to provide that measures to mitigate or avoid significant effects on the environment are fully enforceable through permit conditions, agreements, or other measures. CEQA also requires public agencies to adopt a monitoring and reporting program for assessing and ensuring the implementation of proposed mitigation measures (Section 21081.6). The mitigation measures identified in the Mitigation Monitoring and Reporting Program (MMRP) for the San Gabriel Valley (SGV) Greenway Network Strategic Implementation Plan (Plan; Project), which is provided under separate cover, are those identified within this Findings of Fact (Findings) document and the Statement of Overriding Considerations.

SECTION 2 Overview of the Proposed Project

2.1 SGV Greenway Network Strategic Implementation Plan Objectives

State CEQA Guidelines Section 15124(b) requires the project description to include a statement of objectives for the proposed project, including the underlying purpose of the proposed project. The goals of the Plan (referred to as objectives under CEQA) began in May 2017, as a motion set forth by the Los Angeles County Board of Supervisors (Board), that stated "The flood control systems in the Los Angeles County rivers, creeks, and channels present a unique opportunity to create a countywide network of interconnected, multiuse community greenways for linear parks and open space for recreation, bike paths for active transportation, trails for equestrian use, and integrated stormwater management practices." The Board motion also outlines six specific plan objectives and goals which include:

- Promoting Equitable Practices
- Creating Recreational Opportunities
- Integrating Stormwater Management
- Boosting Connections
- Enhancing Natural Habitats
- Enriching Community Well-Being

The Project objectives identified in the PEIR are the same as the six plan objectives listed above.

2.2 Proposed Project

The Plan would accelerate development of greenway design standards and facilitate cooperative agreements with other agencies to expedite project delivery for shovel-ready projects within the Plan Area. This approach would enable simultaneous implementation of high priority greenway projects while ensuring consistency with the broad master planning of the Greenway Network.

The Plan envisions the development of an active transportation and recreational corridor for bicyclists, pedestrians, and equestrians utilizing the open spaces adjacent to the Los Angeles County Flood Control District (District)'s stormwater channels; beautification of the District Right of Way (ROW); and enhancement of stormwater management and natural habitats along river channels, stormwater channels, washes, and creeks in the SGV. The Plan Area considered in the PEIR is the District ROW along the tributary segments and adjacent parcels.

The Plan consists of infrastructure and greenway designs, or project components, that illustrate the range of possible strategies that the proponents of subsequent projects, including the County of Los Angeles (County), can use to create multi-benefit projects throughout the Plan Area. The decision to carry out a future project would be driven by the local jurisdiction's needs, funding, and policy decisions. The main project component in the Plan is a greenway path, which may consist of multi-use trails and paths, bike paths and bikeways, pedestrian paths, and equestrian trails. In addition to the main project component (greenway path), are subcomponents, which include the following:

- Greenway Amenities

- Pocket Parks and Greenspaces
- Safe Crossings
- Stormwater Management

Within each class of subcomponents is a recommended collection of beneficial project elements. Beneficial project elements are intended to contribute to the attractiveness of the Greenway Network; promote safety, accessibility, and legibility; and build a cohesive identity within the Greenway Network. Beneficial project elements can include, but are not limited to, fencing, benches, trash cans, or signage for greenway amenities; playgrounds or sports fields for pocket parks and greenspaces; curb extensions and raised medians or signage for safe crossings; and green infrastructure or low impact development such as bioretention or permeable pavement for stormwater management.

SECTION 3 CEQA Review and Public Participation

3.1 Notice of Preparation

The County, in accordance with CEQA, prepared a Notice of Preparation (NOP), which was released to the public and filed with the State Clearinghouse (SCH No. 2022090340) in the Governor's Office of Land Use and Climate Innovation and the Los Angeles County Clerk on September 20, 2022.

The NOP, which was provided in English and Spanish, provided notice to the public and public agencies that a PEIR would be prepared, described the proposed Project that would be evaluated in detail in the PEIR, listed the probable environmental effects of the proposed Project, and identified the date, time, and location for an online scoping meeting, which was held on October 04, 2022. A total of 21 participants attended the meeting.

The NOP was distributed to public agencies and interested parties for a 30-day public review period, which began on September 20, 2022, and ended on October 20, 2022. In addition, public notice of the scoping period was provided in the following publications: LA Times, LA Daily News, La Opinion, SGV News Tribune, and Pasadena Star News. The NOP was also mailed via certified mail to government officials, government agencies, and stakeholders identified by Public Works as interested parties. The text of the notification letter was also posted to LACPW's various social media accounts. These included Facebook, Twitter, Instagram, and Nextdoor. The NOP was also posted on the SGV Greenway Network Plan website (https://www.sgvgreenway.org). All written comments provided by the public, and public agencies and others on the NOP are included in Appendix A of the Draft PEIR. These comments were considered during preparation of the Draft PEIR.

3.2 Draft PEIR

The Draft SGV Greenway Network Strategic Implementation Plan was released to the public on April 15, 2025, for review and comment. The proposed Plan provides a guide to develop an active transportation and recreational corridor for bicyclists, pedestrians, and equestrians; beautify the District ROW; and enhance stormwater management and natural habitats around river channels, stormwater channels, washes, and creeks in the SGV. Project components that are evaluated in the PEIR include greenway paths and amenities; pocket parks and greenspaces; safe crossings at roads, railroad tracks, and channels; and stormwater management opportunities. Potential impacts that could from either short-term construction and/or long-term operation of the projects that may be implemented under the Plan are identified in the PEIR at a program-level. In addition, 10 conceptual project examples included in the Plan are also evaluated within the bounds of the program-level analysis to determine if their impacts would be more significant than the project component findings. Thus, no new mitigation measures that are not already identified during program level analysis for the project components are proposed for the conceptual design examples. A more detailed description of impacts of the 10 conceptual design examples within the specific jurisdictions or environmental setting of their location is included when applicable. It is important to note that the 10 conceptual design examples serve only as examples of the

types of projects possible under the Plan, are not being proposed for implementation as part of the Plan and have not been developed at a level of detail sufficient to support project-level analysis.

3.3 Notice of Availability, Newspaper Ads, and Emails

Notification of the availability of the Draft PEIR was provided in English and Spanish and was sent to the public and interested or affected agencies for review on April 15, 2025. A 45-day comment period on the Draft PEIR occurred between April 15, 2025 and May 30, 2025. During public review, members of the public, and public agencies and were provided the opportunity to review the Draft PEIR and provide comments on the document, related to the adequacy of the impact analyses.

The Draft PEIR was available for review on Public Works' website (https://pw.lacounty.gov/core-service-areas/water-resources/sgvgnsip-peir/). Physical copies of the Draft PEIR were also available for review at the following locations:

- Los Angeles County Public Works Headquarters, 900 South Fremont Avenue, 11th floor, Alhambra, CA 91803
- Altadena Library, 600 E Mariposa St. Altadena, CA 91001
- Arcadia Public Library, 20 W. Duarte Road, Arcadia, CA 91006
- Baldwin Park Library, 4181 Baldwin Park Boulevard, Baldwin Park, CA 91706
- Covina Public Library, 234 N. 2nd Avenue, Covina, CA 91723
- Glendora Public Library, 140 Glendora Avenue, Glendora, CA 91741
- Hastings Branch Library, 3325 E. Orange Grove Boulevard, Pasadena, CA 91107
- La Puente Library, 15920 Central Avenue, La Puente, CA 91744
- La Verne Public Library, 3640 D Street, La Verne, CA 91750
- Monrovia Public Library, 321 S. Myrtle Avenue, Monrovia, CA 91016
- Rosemead Library, 8800 Valley Boulevard, Rosemead, CA 91770
- San Gabriel Library, 500 S. Del Mar Avenue, San Gabriel, CA 91776

Public notice of the availability of the Draft PEIR was provided in the following publications: LA Times, LA Daily News, La Opinion, SGV News Tribune, and Pasadena Star News. Copies of the notice of availability were mailed via certified mail to public agencies and all individuals who provided scoping comments on April 15, 2025 (for a total of 70 recipients), and also sent via email on April 15, 2025.

A total of five individual written comment letters were received on the Draft PEIR during the comment period. Four of the five comments received were from public agencies (California Public Utilities Commission, Main San Gabriel Watermaster, California Department of Transportation, and the California Department of Fish and Wildlife). One comment was received by a member of the public.

Section 15088 of the State CEQA Guidelines requires that the lead agency evaluate comments on environmental issues received from persons and agencies that reviewed the Draft PEIR and prepare a written response to comments raising significant environmental issues. The responses to comments received during the comment period are contained in Chapter 2, Response to Comments, of the Final PEIR. A copy of each comment letter and a response to each comment are provided in Appendix A and Chapter 2 of the Final PEIR, respectively.

SECTION 4 Findings Required under CEQA

California Public Resources Code (PRC) Section 21002 states:

> …public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects, and that the procedures required by this division are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects. The Legislature further finds and declares that in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof.

The mandate and principles presented in PRC Section 21002 are implemented, in part, through the requirement that agencies must adopt findings before approving projects for which EIRs are required (PRC Section 21081(a); State CEQA Guidelines Section 15091(a)). For each significant environmental effect identified in an EIR for a proposed project, the approving agency must issue a written finding accompanied by a brief explanation of the rationale for each finding. The possible findings in State CEQA Guidelines Section 15091(a) are:

> (1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
>
> (2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
>
> (3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

The following sections set forth the County's findings from the PEIR's determinations regarding significant environmental impacts and the mitigation measures proposed to address the significant impacts associated with the proposed Project. Although State CEQA Guidelines Section 15091 and PRC Section 21081 only require findings to address significant environmental effects, findings often address impacts that were found to be less than significant; therefore, these findings will account for all effects identified in the PEIR.

These findings provide the written analysis and conclusions of the County regarding the environmental impacts of the SGV Greenway Network Strategic Implementation Plan, the mitigation measures included as part of the Final PEIR and adopted by the County as part of the proposed Project. Because the County agrees with, and hereby adopts, the conclusions in the Final PEIR, which include the analyses provided in the Draft PEIR, these findings do not repeat the analyses and conclusions of the Final PEIR, but instead incorporate them by reference and rely upon them as substantial evidence supporting these findings.

SECTION 5 No Environmental Impacts

The PEIR identifies certain activities that would result in no environmental impact to either project construction or operation and includes the following:

- Agriculture (Section 3.2)
  - Convert FMMP Farmland
    - Greenway Paths + Greenway Amenities (Construction and Operations)
    - Greenway Paths + Pocket Parks and Greenspaces (Construction and Operations)
    - Greenway Paths + Safe Crossings (Construction and Operations)
    - Greenway Paths + Stormwater Management (Construction and Operations)
- Biological Resources (Section 3.4)
  - Conflict with Conservation Plans
    - Greenway Paths + Greenway Amenities (Construction and Operations)
    - Greenway Paths + Pocket Parks and Greenspaces (Construction and Operations)
    - Greenway Paths + Safe Crossings (Construction and Operations)
    - Greenway Paths + Stormwater Management (Construction and Operations)
- Cultural Resources (Section 3.5)
  - Disturb Human Remains
    - Greenway Paths + Greenway Amenities (Operations)
    - Greenway Paths + Pocket Parks and Greenspaces (Operations)
    - Greenway Paths + Safe Crossings (Operations)
    - Greenway Paths + Stormwater Management (Operations)
- Geology and Soils (Section 3.7)
  - Soil Stability
    - Greenway Paths + Greenway Amenities (Operations)
    - Greenway Paths + Pocket Parks and Greenspaces (Operations)
    - Greenway Paths + Safe Crossings (Operations)
    - Greenway Paths + Stormwater Management (Operations)
  - Alternative Wastewater Systems
    - Greenway Paths + Greenway Amenities (Construction and Operations)
    - Greenway Paths + Pocket Parks and Greenspaces (Construction and Operations)
    - Greenway Paths + Safe Crossings (Construction and Operations)
    - Greenway Paths + Stormwater Management (Construction and Operations)
- Population and Housing (Section 3.14)
  - Unplanned Population Growth
    - Greenway Paths + Greenway Amenities (Construction and Operations)
    - Greenway Paths + Pocket Parks and Greenspaces (Construction and Operations)
    - Greenway Paths + Safe Crossings (Construction and Operations)

        - Greenway Paths + Stormwater Management (Construction and Operations)

- Utilities and Service Systems (Section 3.19)
  - Wastewater Treatment Capacity

        - Greenway Paths + Greenway Amenities (Construction)
        - Greenway Paths + Pocket Parks and Greenspaces (Construction)
        - Greenway Paths + Safe Crossings (Construction)
        - Greenway Paths + Stormwater Management (Construction)

SECTION 6 Less than Significant Environmental Impacts (Without Mitigation)

The PEIR identifies certain activities that would result in less-than-significant impacts to project construction or operation and includes the following:

- Aesthetics (Section 3.1)
  - Scenic Vista
    - Greenway Paths + Greenway Amenities (Operations)
    - Greenway Paths + Pocket Parks and Greenspaces (Operations)
    - Greenway Paths + Safe Crossings (Operations)
    - Greenway Paths + Stormwater Management (Operations)
  - Scenic Resources
    - Greenway Paths + Greenway Amenities (Construction and Operations)
    - Greenway Paths + Pocket Parks and Greenspaces (Construction and Operations)
    - Greenway Paths + Safe Crossings (Construction and Operations)
    - Greenway Paths + Stormwater Management (Construction and Operations)
  - Light or Glare
    - Greenway Paths + Greenway Amenities (Construction)
    - Greenway Paths + Pocket Parks and Greenspaces (Construction)
    - Greenway Paths + Safe Crossings (Construction)
    - Greenway Paths + Stormwater Management (Construction)
- Air Quality (Section 3.3)
  - Obstruct Implementation of the Applicable Air Quality Plan
    - Greenway Paths + Greenway Amenities (Operations)
    - Greenway Paths + Pocket Parks and Greenspaces (Operations)
    - Greenway Paths + Safe Crossings (Operations)
    - Greenway Paths + Stormwater Management (Operations)
  - Violate Air Quality Standards
    - Greenway Paths + Greenway Amenities (Construction and Operations)
    - Greenway Paths + Pocket Parks and Greenspaces (Construction and Operations)
    - Greenway Paths + Safe Crossings (Construction and Operations)
    - Greenway Paths + Stormwater Management (Construction and Operations)
  - Expose Sensitive Receptors
    - Greenway Paths + Greenway Amenities (Operations)
    - Greenway Paths + Pocket Parks and Greenspaces (Operations)
    - Greenway Paths + Safe Crossings (Operations)
    - Greenway Paths + Stormwater Management (Operations)
  - Other Emissions/Odors
    - Greenway Paths + Greenway Amenities (Construction)
    - Greenway Paths + Pocket Parks and Greenspaces (Construction)

        - Greenway Paths + Safe Crossings (Construction)
        - Greenway Paths + Stormwater Management (Construction)

- Cultural Resources (Section 3.5)
    - Changes in Historical Resources
        - Greenway Paths + Greenway Amenities (Operations)
        - Greenway Paths + Pocket Parks and Greenspaces (Operations)
        - Greenway Paths + Safe Crossings (Operations)
        - Greenway Paths + Stormwater Management (Operations)
    - Changes in Archaeological Resources
        - Greenway Paths + Greenway Amenities (Operations)
        - Greenway Paths + Pocket Parks and Greenspaces (Operations)
        - Greenway Paths + Safe Crossings (Operations)
        - Greenway Paths + Stormwater Management (Operations)
- Energy (Section 3.6)
    - Consumption of Energy
        - Greenway Paths + Greenway Amenities (Construction)
        - Greenway Paths + Pocket Parks and Greenspaces (Construction)
        - Greenway Paths + Safe Crossings (Construction)
        - Greenway Paths + Stormwater Management (Construction)
    - State or Local Plans
        - Greenway Paths + Greenway Amenities (Construction)
        - Greenway Paths + Pocket Parks and Greenspaces (Construction)
        - Greenway Paths + Safe Crossings (Construction)
        - Greenway Paths + Stormwater Management (Construction)
- Geology and Soils (Section 3.7)
    - Faults, Seismic, and Landslides
        - Greenway Paths + Greenway Amenities (Construction and Operations)
        - Greenway Paths + Pocket Parks and Greenspaces (Construction and Operations)
        - Greenway Paths + Safe Crossings (Construction and Operations)
        - Greenway Paths + Stormwater Management (Construction and Operations)
    - Soil Erosion or Topsoil
        - Greenway Paths + Greenway Amenities (Construction and Operations)
        - Greenway Paths + Pocket Parks and Greenspaces (Construction and Operations)
        - Greenway Paths + Safe Crossings (Construction and Operations)
        - Greenway Paths + Stormwater Management (Construction and Operations)
    - Soil Stability
        - Greenway Paths + Greenway Amenities (Construction)
        - Greenway Paths + Pocket Parks and Greenspaces (Construction)
        - Greenway Paths + Safe Crossings (Construction)
        - Greenway Paths + Stormwater Management (Construction)
    - Expansive Soil
        - Greenway Paths + Greenway Amenities (Construction and Operations)

        - Greenway Paths + Pocket Parks and Greenspaces (Construction and Operations)
        - Greenway Paths + Safe Crossings (Construction and Operations)
        - Greenway Paths + Stormwater Management (Construction and Operations)

- Hazards and Hazardous Materials (Section 3.9)
    - Routine Transport
        - Greenway Paths + Greenway Amenities (Construction and Operations)
        - Greenway Paths + Pocket Parks and Greenspaces (Construction and Operations)
        - Greenway Paths + Safe Crossings (Construction and Operations)
        - Greenway Paths + Stormwater Management (Construction and Operations)
    - Accidental Conditions
        - Greenway Paths + Greenway Amenities (Operations)
        - Greenway Paths + Pocket Parks and Greenspaces (Operations)
        - Greenway Paths + Safe Crossings (Operations)
        - Greenway Paths + Stormwater Management (Operations)
    - Hazards to School
        - Greenway Paths + Greenway Amenities (Operations)
        - Greenway Paths + Pocket Parks and Greenspaces (Operations)
        - Greenway Paths + Safe Crossings (Operations)
        - Greenway Paths + Stormwater Management (Operations)
    - Hazardous Material Sites
        - Greenway Paths + Greenway Amenities (Operations)
        - Greenway Paths + Pocket Parks and Greenspaces (Operations)
        - Greenway Paths + Safe Crossings (Operations)
        - Greenway Paths + Stormwater Management (Operations)
    - Airport Land Use Plan Area
        - Greenway Paths + Greenway Amenities (Construction and Operations)
        - Greenway Paths + Pocket Parks and Greenspaces (Construction and Operations)
        - Greenway Paths + Safe Crossings (Construction and Operations)
        - Greenway Paths + Stormwater Management (Construction and Operations)
    - Emergency Response Plan
        - Greenway Paths + Greenway Amenities (Operations)
        - Greenway Paths + Pocket Parks and Greenspaces (Operations)
        - Greenway Paths + Safe Crossings (Operations)
        - Greenway Paths + Stormwater Management (Operations)

- Hydrology and Water Quality (Section 3.10)
    - Water Quality Standards
        - Greenway Paths + Greenway Amenities (Construction and Operations)
        - Greenway Paths + Pocket Parks and Greenspaces (Construction and Operations)
        - Greenway Paths + Safe Crossings (Construction and Operations)
        - Greenway Paths + Stormwater Management (Construction and Operations)
    - Groundwater Supplies
        - Greenway Paths + Greenway Amenities (Construction and Operations)
        - Greenway Paths + Pocket Parks and Greenspaces (Construction and Operations)

        - Greenway Paths + Safe Crossings (Construction and Operations)
        - Greenway Paths + Stormwater Management (Construction and Operations)
    - Drainage Patterns
        - Greenway Paths + Greenway Amenities (Construction and Operations)
        - Greenway Paths + Pocket Parks and Greenspaces (Construction and Operations)
        - Greenway Paths + Safe Crossings (Construction and Operations)
        - Greenway Paths + Stormwater Management (Construction and Operations)
    - Inundation
        - Greenway Paths + Greenway Amenities (Construction and Operations)
        - Greenway Paths + Pocket Parks and Greenspaces (Construction and Operations)
        - Greenway Paths + Safe Crossings (Construction and Operations)
        - Greenway Paths + Stormwater Management (Construction and Operations)

- Land Use and Planning (Section 3.11)
    - Divide Established Community
        - Greenway Paths + Greenway Amenities (Construction and Operations)
        - Greenway Paths + Pocket Parks and Greenspaces (Construction and Operations)
        - Greenway Paths + Safe Crossings (Construction and Operations)
        - Greenway Paths + Stormwater Management (Construction and Operations)

- Mineral Resources (Section 3.12)
    - Availability of Mineral Resources
        - Greenway Paths + Greenway Amenities (Operations)
        - Greenway Paths + Pocket Parks and Greenspaces (Operations)
        - Greenway Paths + Safe Crossings (Operations)
        - Greenway Paths + Stormwater Management (Operations)
    - Locally Important Mineral Resources
        - Greenway Paths + Greenway Amenities (Operations)
        - Greenway Paths + Pocket Parks and Greenspaces (Operations)
        - Greenway Paths + Safe Crossings (Operations)
        - Greenway Paths + Stormwater Management (Operations)

- Noise (Section 3.13)
    - Groundborne vibration or noise
        - Greenway Paths + Greenway Amenities (Operations)
        - Greenway Paths + Pocket Parks and Greenspaces (Operations)
        - Greenway Paths + Safe Crossings (Operations)
        - Greenway Paths + Stormwater Management (Operations)
    - Airport Land Use Plan Area
        - Greenway Paths + Greenway Amenities (Construction and Operations)
        - Greenway Paths + Pocket Parks and Greenspaces (Construction and Operations)
        - Greenway Paths + Safe Crossings (Construction and Operations)
        - Greenway Paths + Stormwater Management (Construction and Operations)

- Population and Housing (Section 3.14)
    - Displace Existing Housing

        - Greenway Paths + Greenway Amenities (Construction and Operations)
        - Greenway Paths + Pocket Parks and Greenspaces (Construction and Operations)
        - Greenway Paths + Safe Crossings (Construction and Operations)
        - Greenway Paths + Stormwater Management (Construction and Operations)

- Public Services (Section 3.15)
    - New or Altered Government Facilities or Services

        - Greenway Paths + Greenway Amenities (Operations)
        - Greenway Paths + Pocket Parks and Greenspaces (Operations)
        - Greenway Paths + Safe Crossings (Operations)
        - Greenway Paths + Stormwater Management (Operations)

- Recreation (Section 3.16)
    - Use of Neighborhood Recreation

        - Greenway Paths + Greenway Amenities (Operations)
        - Greenway Paths + Pocket Parks and Greenspaces (Operations)
        - Greenway Paths + Safe Crossings (Operations)
        - Greenway Paths + Stormwater Management (Operations)

- Transportation
    - Conflict with Circulation System Program, Plan, Ordinance, or Policy

        - Greenway Paths + Greenway Amenities (Operations)
        - Greenway Paths + Pocket Parks and Greenspaces (Operations)
        - Greenway Paths + Safe Crossings (Operations)
        - Greenway Paths + Stormwater Management (Operations)

    - State CEQA Guidelines Section 15064.3 subdivision (b)

        - Greenway Paths + Greenway Amenities (Construction and Operations)
        - Greenway Paths + Pocket Parks and Greenspaces (Construction)
        - Greenway Paths + Safe Crossings (Construction and Operations)
        - Greenway Paths + Stormwater Management (Construction and Operations)

    - Hazards due to Geometric Design Feature or Result in Inadequate Emergency Access

        - Greenway Paths + Greenway Amenities (Operations)
        - Greenway Paths + Pocket Parks and Greenspaces (Operations)
        - Greenway Paths + Safe Crossings (Operations)
        - Greenway Paths + Stormwater Management (Operations)

    - Emergency Access

        - Greenway Paths + Greenway Amenities (Operations)
        - Greenway Paths + Pocket Parks and Greenspaces (Operations)
        - Greenway Paths + Safe Crossings (Operations)
        - Greenway Paths + Stormwater Management (Operations)

- Utilities and Services Systems (Section 3.19)
    - Exceed Water or Wastewater Treatment Stormwater Drainage, Electric Power, Natural Gas, or Telecommunications Facilities

        - Greenway Paths + Stormwater Management (Operations)
    - Water Supplies
        - Greenway Paths + Greenway Amenities (Construction and Operations)
        - Greenway Paths + Pocket Parks and Greenspaces (Operations)
        - Greenway Paths + Safe Crossings (Construction and Operations)
    - Generation of Waste
        - Greenway Paths + Greenway Amenities (Construction and Operations)
        - Greenway Paths + Pocket Parks and Greenspaces (Construction and Operations)
        - Greenway Paths + Safe Crossings (Construction and Operations)
        - Greenway Paths + Stormwater Management (Construction and Operations)
    - Compliance with Solid Waste Regulations
        - Greenway Paths + Greenway Amenities (Construction and Operations)
        - Greenway Paths + Pocket Parks and Greenspaces (Construction and Operations)
        - Greenway Paths + Safe Crossings (Construction and Operations)
        - Greenway Paths + Stormwater Management (Construction and Operations)
- Wildfire
    - Emergency Plans
        - Greenway Paths + Greenway Amenities (Operations)
        - Greenway Paths + Pocket Parks and Greenspaces (Operations)
        - Greenway Paths + Safe Crossings (Operations)
        - Greenway Paths + Stormwater Management (Operations)

SECTION 7 Less-than-Significant Environmental Impacts with Mitigation

The County will adopt the mitigation measures identified in the PEIR and will implement or require implementation of the mitigation measures identified in the PEIR for later activities or subsequent projects that are carried out by the County (i.e., the County is directly undertaking the project). The County anticipates that for those projects carried out under the Plan, by entities other than Public Works, the respective lead agency (whether municipality or special district) will adopt the MMRP to avoid or mitigate significant effects on the environment and ensure compliance during project implementation. Pursuant to PRC Sections 21155.2(a) and (b)(2) and Section 21159.28(a), future projects that seek to tier from the PEIR must incorporate the mitigation measures identified herein. The lead agency is responsible for successfully implementing all the mitigation measures in the MMRP, and for ensuring that these requirements are met by the project proponent. Alternatively, if the identified mitigation measure is found to be infeasible based on substantial evidence, the lead agency under CEQA for the future project must incorporate equivalent measures that would avoid or mitigate potential impacts to a less than significant level.

Impacts are identified as construction or operation impacts, or both, in each subsection below.

7.1 Aesthetics

7.1.1 Impact – Aesthetics (a) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction)

Construction of the greenway paths and amenities, pocket parks and greenspaces, and stormwater management facilities would typically result in new or newly configured greenspaces in the parcels affected. Construction would involve ground disturbance, construction equipment operation, stockpiling of materials, views of incomplete structures, and worker activities that would contrast with the aesthetic character of a site. These conditions would be present for the duration of the construction period and would temporarily impact scenic vistas if located within the viewshed of a designated area. Construction activities could also result in an adverse impact to the views from nearby residents and people on the District ROW and adjacent parcels where a project may be located.

7.1.1.1 Finding

Changes or alterations have been required in, or incorporated into, the proposed Project to avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, resulting in a less than significant impact.

7.1.1.2 Mitigation Measure(s)

Pursuant to State CEQA Guidelines Section 15091, the following mitigation measures have been included in an MMRP that is recommended for to be adoption concurrently with these findings.

MM AES-1: Install Construction Fencing for Visual Screening and Security for Construction Lasting Longer than 30 Days. For construction projects lasting greater than 30 days, the project proponent shall require contractors to 1) install neutral color (e.g., green, brown, black, white, tan, navy) perimeter fencing of a minimum height of six feet around construction areas to screen and provide security to pedestrians and other people with a view of the site to reduce views of construction staging areas, grading, and site disturbance.

7.1.2 Impact – Aesthetics (d) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Operations)

Nighttime lighting fluctuates throughout the Plan Area due to motor vehicle headlights, existing streetlights, and building security lights. Existing glare in the surrounding environment is typical of highly urbanized areas, with sunlight reflected off the surfaces of buildings, vehicles, and windows. The channels in the Plan Area feature concrete or natural bottoms and do not contain reflective materials. While highly urbanized, a significant impact would occur if a new substantial source of light/glare is introduced by a project. Section 10.6 of the *Design Guidelines and Standards* provides Plan-specific lighting guidance.

7.1.2.1 Finding

Changes or alterations have been required in, or incorporated into, the proposed Project to avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, resulting in a less than significant impact.

7.1.2.2 Mitigation Measure(s)

Pursuant to State CEQA Guidelines Section 15091, the following mitigation measures have been included in an MMRP that is to be adopted concurrently with these findings.

MM AES-2: Develop and Submit Lighting Plan. The project proponent shall develop a lighting plan consistent with the lighting code and policies of the municipality in which the project is located.

7.2 Air Quality

7.2.1 Impact – Air Quality (a) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction)

In the event that construction of an individual Plan project would result in emissions that exceed regional or localized standards and therefore would not be consistent with the applicable regulations, implementation of **MM AQ-1: Emission Reduction Measures** would reduce emissions below such

thresholds ensure consistency with control strategies included in the 2022 Air Quality Management Plan prepared by South Coast Air Quality Management District (SCAQMD), which may be achieved by implementing Tier 4 final construction equipment and therefore implementing more efficient equipment in conformance with the implementation requirements of the AQMP.

7.2.1.1 Finding

Changes or alterations have been required in, or incorporated into, the proposed Project to avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, resulting in a less than significant impact.

7.2.1.2 Mitigation Measure(s)

Pursuant to State CEQA Guidelines Section 15091, the following mitigation measures have been included in an MMRP that is to be adopted concurrently with these findings.

MM AQ-1: Emissions Reduction Measures. For projects that would exceed the SCAQMD regional or local thresholds or with an anticipated construction duration of greater than six months and are located within 500 feet of a residence or other sensitive receptor, the following emission reduction measures shall be implemented:

- Require the use of electricity from power poles rather than temporary diesel or gasoline powered generators, as feasible.
- Minimize vehicle idling time in accordance with the Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling (Title 13, Division 3, Chapter 10, Section 2485).
- Minimize equipment idling time in accordance with the In-Use Off-Road Diesel-Fueled Fleets (Title 13, CCR, Section 2449).
- Require the use 2013 model year engines for all diesel-powered vehicles that conform to the USEPA "Emission Standards and Supplemental Requirements for 2007/2010 Model Year Diesel Heavy-Duty Engines and Vehicles" per 40 CFR 86.007-11 (e.g., material delivery trucks and soil import/export). Additionally, consider other measures such as incentives, phase-in schedules for clean trucks, etc. during the construction period.
- Vehicles with a GVWR greater than 14,000 pounds shall comply with the Truck and Bus Regulations (Title 13, CCR, Section 2025), the Clean Truck Check Program/Heavy-Duty Vehicle Inspection and Maintenance Program (Title 13, CCR, Sections 2195 through 2199.1), and all amendments. All vehicle owners shall register and report on the Truck Regulation Upload, Compliance, and Reporting System and report in the Clean Truck Check-Vehicle Inspection System Database to certify regulation compliance.
- During construction activities, at a minimum, all internal combustion engines/construction equipment operating shall meet Tier 4 Final CARB/USEPA emission standards per 40 CFR 1039.
- All off-road diesel-powered equipment 25 horsepower or greater shall comply with the In-Use Off-Road Diesel Fueled Fleets Regulations (Title 13, California Code of Regulations, Section 2449) and amendments. Equipment owners shall report on the Diesel Off-Road Online Reporting System to certify regulation compliance.
- Where it is determined that construction emissions would exceed the applicable SCAQMD regional thresholds and/or LSTs even with the requirement that all construction equipment meet Tier 4 Final CARB/USEPA emissions standards, the 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 project's construction emissions would no longer exceed SCAQMD's regional thresholds and/or LSTs.

7.2.2 Impact – Air Quality 3(c) Greenway Paths + Greenway Amenities and Greenway Paths + Stormwater Management (Construction)

Throughout the Plan area, with compliance with CARB Heavy-Duty On-Road and Off-Road Vehicle Regulations, construction activities would limit idling to no more than five minutes, which would reduce nearby sensitive receptors' exposure to temporary and variable DPM emissions. Furthermore, even during the most intense period of construction, emissions of DPM would be generated from different locations on the project site rather than in a single location because different types of construction activities (e.g., site preparation and paving) would not occur at the same place at the same time. Implementation of **MM AQ-1: Emission Reduction Measures** would substantially reduce on-site emissions DPM from off-road equipment (the use of Tier 4 Final off-road diesel construction equipment reduces DPM emissions by at least 80 percent compared to the default CalEEMod fleet mix, which is composed of Tier 0 to Tier 2 equipment with higher DPM emissions). Requiring that construction equipment meet Tier 4 Final emissions standards, as well as ensuring compliance with the best management practices outlined in SCAQMD Rule 403 (Fugitive Dust), would ensure that construction of greenway paths and amenities would not expose sensitive receptors to substantial pollutant concentrations.

7.2.2.1 Finding

Changes or alterations have been required in, or incorporated into, the proposed Project to avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, resulting in a less than significant impact.

7.2.2.2 Mitigation Measure(s)

Pursuant to State CEQA Guidelines Section 15091, the following mitigation measures have been included in an MMRP that is to be adopted concurrently with these findings.

MM AQ-1: Emissions Reduction Measures, described above.

7.2.3 Impact – Air Quality 3(d) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Operations)

Improper handling and storage of manure, along with odor migration, may lead to offsite nuisance violations. Good housekeeping and BMPs can eliminate nuisance concerns. Implementation of **MM AQ-3: Implement Equestrian Manure Management** would reduce the potential for animal waste to result in odor impacts at nearby sensitive receptors.

7.2.3.1 Finding

Changes or alterations have been required in, or incorporated into, the proposed Project to avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, resulting in a less than significant impact.

7.2.3.2 Mitigation Measure(s)

Pursuant to State CEQA Guidelines Section 15091, the following mitigation measures have been included in an MMRP that is to be adopted concurrently with these findings.

MM AQ-3: Implement Equestrian Manure Management. For Plan elements that include an equestrian facility, the implementing agency shall comply with the following measures:

- The facility, including animal stalls and warmup and training areas, will be cleaned at least once per day, including the removal of manure and soiled bedding.
- Manure and soiled bedding will either be incorporated into composting by the end of the day or temporarily stockpiled prior to incorporation into the composting system.
- Stockpiled material in containment vessels will be covered with a lid or tarp. Containment vessels will be located at the farthest feasible distance from nearby residents and/or sensitive receptors.

7.3 Biological Resources

7.3.1 Impact – Biological Resources 4(a) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction and Operations)

Construction of Plan elements would occur within the District ROW while pocket parks and greenspaces could occur within the District ROW or on adjacent parcels. Construction activities would typically involve mobilization, ground disturbance (including excavation and grading), construction equipment operation, parking of worker vehicles and equipment, and staging and laydown areas for stockpiling of materials. Generally, the Plan components would aim to be constructed in ruderal areas within the District ROW, which do not support high quality habitat for native plants and wildlife species. However, a site-specific evaluation would be conducted by a qualified biologist to determine the specific potential for special status species to occur at the specific location for individual projects proposed under the Plan and inform the specific biological surveys required (**MM BIO-1: Desktop Review and Biological Surveys**). **MM BIO-2: Pre-construction Nesting Bird Surveys** through **MM BIO-11: Use Bird Safe Glass** include a variety of pre-construction special species surveys and measures, in addition to design specifications to minimize impacts to biological resources across the Plan area construction and operations impacts.

For impacts to Greenway Paths and Greenway Amenities + Pocket Parks and Greenspaces, construction elements would implement **MM BIO-1: Desktop Review and Biological Surveys** through **MM BIO-8: Construction BMPs to Protect Wildlife**, given that impacts could result in similar impacts to those described above for the remaining Plan elements, with an increased footprint of up to 25 acres in size. Operations impacts would be similar to those outlined above, implementing **MM BIO-2: Pre-construction Nesting Bird Surveys**, **MM BIO-7: Implement Weed Abatement Measures**, and **MM BIO-9** through **MM BIO-11: Use Bird Safe Glass**.

7.3.1.1 Finding

Changes or alterations have been required in, or incorporated into, the proposed Project to avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, resulting in a less than significant impact.

7.3.1.2 Mitigation Measure(s)

Pursuant to State CEQA Guidelines Section 15091, the following mitigation measures have been included in an MMRP that is to be adopted concurrently with these findings.

MM BIO-1: Desktop Review and Biological Surveys. Conduct biological surveys of any areas where potential special status biological resources (special status species and species of special of concern), or sensitive natural communities may occur. During the design of the project, and prior to construction, the project proponent shall employ a qualified biologist to review the proposed project. To the extent feasible, the location(s) of a proposed project shall be on previously disturbed or developed sites and shall avoid undisturbed, high-quality, natural habitat that supports special status biological resources, areas that are used for regional or local wildlife movement, and jurisdictional wetlands and associated waters. If a desktop review indicates that special status biological resources or natural communities may occur in the project area, the project proponent shall either assume presence and mitigate accordingly, or a qualified biologist shall conduct species-specific biological surveys or botanical field surveys to confirm the presence and extent of special status biological resources and/or sensitive natural communities prior to the start of construction. The biological survey evaluation shall include an assessment of potential downstream impacts resulting from flow diversions, if such stormwater BMPs are considered as part of Project design. Surveys shall be conducted according to protocols currently accepted by CDFW and/or USFWS. If no accepted survey protocol exists, the project proponent shall consult CDFW for guidance. To determine presence/absence or accurately identify rare plants, a qualified botanist shall conduct multiple rare plant surveys throughout the growing season for any given year. Surveys shall occur during the time of year when rare plants are more likely to be visually detectable. Rare plant surveys proceeding after a low water year should be supplemented with one or two additional rare plant surveys over a number of years depending on the rare plant species, annual weather patterns, and whether the project area was recently disturbed (e.g., fire). If special status biological resources or their sign (e.g., scat, burrows) are observed, the project proponent shall report the observation to CDFW through an entry in the California Natural Diversity Database (CNDDB) and develop a plan to avoid impacts that is specific to each species. If impacts cannot be avoided, the project proponent shall consult with CDFW to obtain appropriate authorization for take of species protected under CESA (pursuant to Fish & G. Code, § 2080 et seq.). The project proponent shall have a copy of a fully executed take authorization prior to any activity that may result in take or CESA-protected species. If the desktop review indicates that no special status biological resources or natural communities may occur in the project area, then biological surveys are not required.

MM BIO-2: Pre-construction Nesting Bird Surveys. Conduct pre-construction nesting bird surveys and implement appropriate buffers. To avoid disturbance of nesting and special status birds, including species protected by the MBTA and California Fish and Game Code, activities related to the implementation of any project, including, but not limited to, ground disturbance, and vegetation

trimming/removal, shall occur outside of the non-raptor bird breeding season (February 1 through August 31). If these activities must begin during the breeding season, then the project proponent shall conduct a pre-construction nesting bird survey no more than three days prior to initiation of ground disturbance activities. The nesting bird pre-construction survey shall be conducted on foot inside the project area, including a 300-foot buffer, and conducted in inaccessible areas (e.g., private lands) from afar using binoculars to the extent practical. The survey shall be conducted by a biologist familiar with the identification of avian species known to occur in the Plan Area. If construction is scheduled to occur during the breeding season for raptors (January 15 to September 15), then no more than seven days before the start of the activities, a qualified biologist will conduct a pre-construction survey for nesting raptors in areas where suitable habitat is present within the project area and up to a 500-foot buffer, as determined by a qualified biologist. If active nests are found, an avoidance buffer (dependent upon the species, and existing disturbances associated with land uses outside of the site) shall be determined and demarcated by the biologist with construction fencing, flagging, construction lathe, or other means. All project personnel working at a project site shall be notified of the buffer zone and all construction activities and project personnel will avoid entering the buffer zone until the avian biologist has confirmed that breeding/nesting is completed and the young have fledged the nest or confirmed that the nest is no longer active. Encroachment into the buffer shall occur only at the discretion of the qualified biologist.

MM BIO-3: Conduct Burrowing Owl Pre-construction Surveys. Prior to any construction or ground disturbance which could disturb burrowing owl burrows or nesting, a qualified biologist shall conduct protocol-level surveys for burrowing within suitable habitat and extending 500 feet from the boundary of the work area, where access is available. Surveys shall be conducted in accordance with protocols currently accepted by CDFW. If burrowing owl or their sign are observed, the Project proponent shall report the observation to CDFW through an entry in CNDDB and develop a site-specific plan to avoid impacts on burrowing owl. If impacts cannot be avoided, the Project proponent shall consult with CDFW to obtain appropriate authorization for take of species protected under CESA. The Project proponent shall have a fully executed take authorization prior to any activity that may result in take of CESA-protected species.

MM BIO-4: Conduct Pre-construction Special Status Bat Surveys. Pre-construction bat surveys will be conducted by a qualified bat biologist within 7 days of starting construction in a work area with suitable habitat for roosting bats during the bat maternity season (March 1 to September 30). The pre-construction survey will include a visual and acoustic survey conducted by the qualified bat biologist within the work area and surrounding areas that have suitable habitat for roosting bats including bridges, abandoned structures or trees with large cavity or dense foliage. If bat roost sites are identified and could be disturbed by project activities, then appropriate bat avoidance, mitigation or relocation measures will be implemented. Prior to any ground-disturbing activity or activities that could disturb bat roost sites, a qualified bat biologist will survey for active bat colonies, such as hibernacula or maternity roosts. If active hibernacula or maternity roosts are identified in the work area or in the buffer area (as defined by the qualified bat biologist, based on site conditions, planned work, and anticipated indirect impacts on bats), a qualified bat biologist will develop and implement appropriate protection measures for that maternity roost or hibernacula. Trees and/or structures determined to be maternity roosts should be left in place until the end of the maternity season. No night-time work will be permitted.

MM BIO-5: Conduct Biological Monitoring. In area that may support special status biological resources or adjacent to special status plants, wildlife, and/or aquatic resources; Sensitive Natural Communities; or protected trees, a qualified biological monitor shall be required to monitor construction or maintenance activities while work is immediately adjacent to these area, or as deemed necessary by the qualified biologist to ensure that protection measures are in place to avoid incidental disturbance of habitat and special status species outside the Plan footprint. Biological monitoring shall include, but not be limited to, monitoring installation of protective barriers, monitoring of active bird nests, ensuring food waste and trash are enclosed in sealed containers and removed from the site, construction equipment remains within the project footprint and designated staging areas, and ensuring that staging and areas used to refuel are located in upland areas away from riparian habitat and aquatic sites.

The qualified biological monitor shall have the authority to stop work to protect biological resources onsite, including special status species, riparian and aquatic resources, and protected trees. If any special status plant or wildlife species are found in a work area, the biological monitor shall have stop work authority to halt construction as necessary to prevent the death or injury to the species until the species leaves of its own accord or the proper consultation with USFWS and/or CDFW can be completed.

MM BIO-6: Implement a Worker Environmental Awareness Program. Prior to the start of construction (including staging and mobilization), all project personnel shall attend a Workers Environmental Awareness Program training, conducted by a qualified biologist, to aid workers in recognizing special status resources that may occur in the Plan Area. The specifics of this program shall include identification of the special status biological resources and habitats, a description of the regulatory status and general ecological characteristics of sensitive resources, and review of the limits of construction and mitigation measures required to reduce impacts to biological resources within the project area.

MM BIO-7: Implement Weed Abatement Measures. The project proponent shall implement weed abatement measures during construction and operations to minimize the spread and introduction of non-native plant material and/or tree diseases. Weed control shall be performed through a physical, cultural, biological, inorganic, or organic method. Chemicals that may be used include pre-emergent herbicides, post-emergent herbicides, and organic herbicides (all post-emergent, non-selective) as per the Countywide Integrated Pest Management Program and one or more of the following measures as applicable:

- Equipment and vehicles shall be cleaned of mud or other debris that may contain invasive plants and/or seeds to reduce the potential of spreading invasive weeds before mobilizing to the site and before leaving the site. Cleaning of equipment shall occur in a designated area away from sensitive natural communities and watercourses.
- Trucks carrying loads of vegetation removed from the work area shall be covered and disposed of in accordance with applicable laws and regulations.
- Only certified weed-free straw, mulch, and/or fiber rolls shall be used for erosion control. Fill material shall be obtained from weed-free sources.
- Any trees identified for removal shall be inspected for contagious tree diseases. To avoid the spread of infectious tree diseases, diseased trees and plant material shall not be transported from the Project site without first being treated using best available management practices relevant for each tree disease observed.

- Following completion of construction, disturbed areas shall be returned to original grade (unless the design incorporated permanent grade changes), soils shall be decompacted, and areas shall be revegetated with native hydroseed and/or container plantings consistent with the *SGV Greenway Network Plant Communities and Planting List* as detailed in design plans or a project-specific restoration plan. All revegetated areas shall avoid the use of species listed in Cal-IPC's California Invasive Plant Inventory.

MM BIO-8: Construction Best Management Practices to Protect Wildlife. The project proponent shall ensure appropriate BMPs are implemented during construction, which consist of the following, as applicable to the project:

- Plastic monofilament netting (e.g., erosion control wattles or matting) or similar material shall be prohibited as part of erosion-control activities. Alternative allowable materials may include, but are not limited to, geotextiles, fiber rolls, geomembranes, hydroseeding compounds, loose-weave mesh, such as jute, hemp, and coconut fiber, and rice straw wattles (e.g., biodegradable, photodegradable, burlap).
- Any excavated areas (holes, pits, or trenches) with steep sides more than 12 inches deep with sidewalls steeper than 45 degrees shall be covered with plywood or similar materials at the end of the day or have escape ramps put in place to keep wildlife from becoming trapped and/or allowing them to escape, with at least one ramp per 100 feet of trenching, and escape ramp slopes of no greater than 3:1. All construction pipe, culverts, or other structures with a diameter of three inches or greater that are stored overnight shall be screened or covered each night to prevent wildlife entrapment.
- Incorporate appropriate buffer zones to avoid and minimize the effects of noise on special status wildlife and nesting birds in areas where special status biological resources have been identified. If a qualified biologist determines that that buffer zones are not sufficient to avoid disturbance, other measures may be incorporated, such as delaying construction until nesting is completed (for nesting birds) or until special status species are no longer present or until a take permit for special status species is obtained.
- The disturbance footprint for construction activity shall be minimized to the extent feasible. Trimming is defined as removal of vegetation to the extent necessary to allow a specific level of access (e.g., vehicles) for specific types of equipment (e.g., trucks, trailers, excavators). There shall be no vegetation removal beyond what is necessary to allow the level of access required for construction activities to occur.

MM BIO-9: Operations Recreation Plan. The Operations Recreation Plan shall include requirements for the following measures, as applicable, to be implemented for by the project proponent in areas where recreational opportunities will be created:

- Signage requiring pets to be on leash
- Pet dropping/waste bag dispensers and disposal stations
- Foot-wiping stations with signage explaining the purpose of the station (to prevent the spread of invasive weeds that degrade natural habitats that species depend on)
- Wildlife-proof waste bins
- Educational interpretive kiosks/signage (e.g., how to respect wildlife and habitats, stay on trail signs, identifying sensitive areas, pick up trash and fishing line, pick up after pets; opportunities to view wildlife)
- Incorporation of signage to avoid ESAs around sensitive wildlife/habitat features

- Prevention of fertilizer runoff
- Management of unauthorized uses through coordination with local resources
- Trail design – where avoidance is not feasible, and where necessary, a project could incorporate into design the modification of trails, spatial arrangement of trails, trail dimensions, access points, and recreational structures to avoid and minimize impacts on sensitive wildlife and/or habitat features.
- Setbacks and restrictions – where avoidance is not feasible, and where necessary, a project could incorporate into design setbacks that consider alert and flight initiation distances for sensitive wildlife with respect to the type and intensity of proposed recreational uses, and could include restrictions on the size of gathering areas at pavilions, etc.
- Proper handling of any non-native plant species removed during operations and maintenance activities to prevent sprouting or regrowth; development of methods to ensure that non-native plant seeds are not spread during plant removal and that plants will be removed prior to flowering, if feasible.

The qualified biologist shall review all proposed temporary and permanent Project elements – such as fencing, gates, and guardrails – for potential impacts on wildlife through trapping, entanglement, collisions, etc., and as potential barriers to connectivity and movement.

MM BIO-10: Prepare and Implement Pest Management Plan. The project proponent shall require that a pest management plan that adheres to the County's Integrated Pest Management Program be prepared and implemented to prevent inadvertent poisoning of non-target wildlife during operations. The use of rodenticides as a pest-control measure shall be prohibited. Additionally, the use of neonicotinoid pesticides shall be prohibited as part of operations, which are known to be harmful to bumble bees.

MM BIO-11: Use Bird Safe Glass. The project proponent shall require that any glass used in the design of facilities is safe for birds. Bird safe glass is designed so that it is a visible obstacle to birds to avoid bird strikes with buildings, while still being transparent to people.

7.3.2 Impact – Biological Resources 4(b) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction and Operations)

Construction activities for greenway paths and greenway amenities, pocket parks and greenspaces, safe crossings, and stormwater management beneficial project elements may be located within the District ROW or adjacent parcels along the washes within the Plan Area. Additionally, safe crossings could occur within the footprint of existing roads or span the washes. Because future project locations are not known at this time and habitat conditions and types at specific locations within the Plan Area may change over time, sensitive natural communities may occur where they are not currently mapped as occurring by CDFW and USFWS. If so, construction activities could result in direct impacts to sensitive natural communities as a result of heavy equipment use and excavation. The implementation of **MM BIO-1: Desktop Review and Biological Surveys**, **MM BIO-5: Conduct Biological Monitoring MM BIO-6: Implement a Worker Environmental Awareness Program**, **MM BIO-7: Weed Abatement Measures**, and **MM BIO-8: Construction BMPs to Protect Wildlife** would identify sensitive communities and provide protection via training and monitoring during construction, resulting in a less than significant impact. Once a future project location is operational, the potential increases in number of visitors could result in direct effects to natural communities through trampling of native vegetation. Maintenance activities

across Plan elements may also result in disturbance of vegetation communities. The implementation of **MM BIO-7: Weed Abatement Measures** and **MM BIO-9: Operations Recreation Plan** would be implemented to prohibit invasive species planting and operational plans to protect sensitive communities from trampling off/trail, minimizing significant impacts, resulting in an overall less than significant impact.

7.3.2.1 Finding

Changes or alterations have been required in, or incorporated into, the proposed Project to avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, resulting in a less than significant impact.

7.3.2.2 Mitigation Measure(s)

Pursuant to State CEQA Guidelines Section 15091, the following mitigation measures have been included in an MMRP that is recommended for adoption concurrently with these findings.

MM BIO-1: Desktop Review and Biological Surveys, described above.

MM BIO-5: Conduct Biological Monitoring, described above.

MM BIO-6: Implement a Worker Environmental Awareness Program, described above.

MM BIO-7: Implement Weed Abatement Measures, described above.

MM BIO-8: Construction BMPs to Protect Wildlife, described above.

MM BIO-9: Operations Recreation Plan, described above.

7.3.3 Impact – Biological Resources 4(c) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction and Operations)

Since project locations are unknown at this time, construction of greenway paths and greenway amenities, pocket parks and greenspaces, safe crossings, and stormwater management facilities could be located within the District ROW along the washes and could result in direct and indirect effects on wetlands and/or potentially jurisdictional aquatic resources if present within or adjacent to the construction footprint. Wetlands occur within the Plan Area. Direct effects to wetlands could result from grading, excavation, soil stockpiling activities, other ground-disturbing activities, and vehicle use and access during construction. Any use of construction equipment or vehicles within wetland areas would be a significant impact, which could damage the area through direct removal, filling, or hydrological interruption. Any clearing and grading, or elevation changes requiring fill material, could compact soils and alter existing hydrologic conditions of wetlands present in the construction area or nearby wetlands. With the implementation of **MM BIO-5: Conduct Biological Monitoring**, **MM BIO-6: Worker Environmental Awareness Program**, **MM BIO-7: Weed Abatement Measures**, **MM BIO-8: Construction BMPs to Protect Wildlife**, **MM BIO-12: Desktop Review and Conduct a Jurisdictional Delineation**, and **MM BIO-13: Permanent Wetlands Signage,** construction impacts would be reduced to less than significant. For operational impacts, increased recreational use of the greenway paths and each

subcomponent could result in direct effects on wetlands, including trampling or damaging wetland vegetation from visitors and/or pets straying off designated greenway paths and other amenities. Indirect operational impacts to wetlands resulting from maintenance and recreation activities, may include introduction of non-native, invasive species from maintenance vehicles and equipment or increased human use of the greenway paths and amenities, pocket parks and greenspaces, or safe crossings and stormwater management. The implementation of **MM BIO-7: Weed Abatement Measures, MM BIO-9: Operations Recreation Plan**, and **MM BIO-13: Permanent Wetland Signage** would reduce the direct and indirect impacts from operations resulting in an overall less than significant impact.

7.3.3.1 Findings

Changes or alterations have been required in, or incorporated into, the proposed Project to avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, resulting in a less than significant impact.

7.3.3.2 Mitigation Measure(s)

Pursuant to State CEQA Guidelines Section 15091, the following mitigation measures have been included in an MMRP that is recommended for to be adoption concurrently with these findings.

MM BIO-5: Conduct Biological Monitoring, described above.

MM BIO-6: Implement a Worker Environmental Awareness Program, described above.

MM BIO-7: Implement Weed Abatement Measures, described above.

MM BIO-8: Construction BMPs to Protect Wildlife, described above.

MM BIO-9: Operations Recreation Plan, described above.

MM BIO-12: Desktop Review and Conduct a Jurisdictional Delineation. A desktop review of the National Wetland Inventory and/or field review shall be conducted to determine if a formal delineation is required. To the extent feasible, the location(s) of all greenway paths, any subcomponents, and associated beneficial project elements shall be on previously disturbed or developed sites and shall avoid jurisdictional wetlands and associated waters. However, if any jurisdictional wetlands or associated waters are identified, a jurisdictional delineation shall be completed. If wetlands or aquatic resources are identified within the project footprint, but will not be affected by construction, then those resources shall be clearly marked for avoidance using flagging, fencing, or other appropriate avoidance method prior to construction. If any wetlands and/or jurisdictional aquatic resources are identified, then implement MM BIO-13.

MM BIO-13: Permanent Wetlands Signage. Any wetlands identified within or adjacent to the construction footprint, but not affected by construction activities, shall be clearly marked with permanent signage and fencing to restrict trespassing by the public and operations and maintenance staff.

7.3.4 Impact – Biological Resources 4(d) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction and Operations)

Construction equipment use and storage and site preparation including vegetation trimming and/or removal for access and staging areas may result in impacts that could adversely affect habitat connectivity, the movement of native species, and use of wildlife nursery sites. Grading and vegetation removal could result in damage or removal of existing habitat which serves as movement corridors or nursery sites for native species. The disturbance of unlined washes during construction that support vegetation can provide higher quality habitat connectivity than non-vegetated areas for various species, including fish, bats, and resident and migratory birds. These areas support important habitat for the movement, migration, and breeding of fish and wildlife species that use them. Vegetated areas and the associated infrastructure within the District ROW and adjacent parcels, including bridges and culverts, may also provide habitat features which support nesting or roosting for bird and bat species (e.g., ledges and crevices), which may be damaged or avoided by construction activities. The implementation of **MM BIO-1: Desktop Review and Biological Surveys**, **MM BIO-5: Conduct Biological Monitoring**, **MM BIO-8: Construction BMPs to Protect Wildlife** would minimize impacts to less than significant with mitigation. For operational impacts, vegetation removal may continue beyond the construction phase, with the additional possibility of trampling from increased human usage. The implementation **MM BIO-7: Weed Abatement Measures** would minimize these impacts to less than significant.

7.3.4.1 Findings

Changes or alterations have been required in, or incorporated into, the proposed Project to avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, resulting in a less than significant impact.

7.3.4.2 Mitigation Measure(s)

MM BIO-1: Desktop Review and Surveys, described above.

MM BIO-5: Conduct Biological Monitoring, described above.

MM BIO-8: Construction BMPs to Protect Wildlife, described above.

MM BIO-9: Operations Recreation Plan, described above.

7.4 Cultural Resources

7.4.1 Impact – Cultural Resources (a) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction)

While most of the Plan Area does not contain any listed historic resources and construction activity within the District ROW would be unlikely to result in substantial adverse changes to the significance of any historic resources as defined in Title 24, Section 15064.5 of the CCR, the location of future project

activities, particularly on parcels adjacent to the District ROW, could occur at or near sites listed on or eligible for listing on the National Register of Historic Places (NRHP) or California Register of Historic Resources (CRHR) or locally designated as historic. Construction activities may result in a significant impact if the project activities result in demolition of or material alteration of a historic resource. In addition, construction activities could indirectly cause damage to historic resources within or adjacent to an individual project site as a result of increased dust and/or vibration. These impacts would be minimized with implementation of **MM AQ-1: Emissions Reduction Measures** and **MM NOI-1: Prepare Construction Noise/Vibration Work and Mitigation Monitoring Plan**. Direct impacts would be avoided and/or minimized with the implementation of **MM CR-1: Historical Resources Assessment.** If the historic resources assessment determines there is a potential to adversely affect an historic resource, the project proponent shall either redesign the project to avoid the resources (**MM CR-2: Avoid Historic Resources**) or prepare an historic resources mitigation plan (**MM CR-3: Prepare and Implement a Historic Resources Mitigation Plan**).

7.4.1.1 Finding

Changes or alterations have been required in, or incorporated into, the proposed Project to avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, resulting in a less than significant impact.

7.4.1.2 Mitigation Measure(s)

Pursuant to State CEQA Guidelines Section 15091, the following mitigation measures have been included in an MMRP that is to be adopted concurrently with these findings.

MM CR-1: Historical Resources Assessment. Historical resources shall be evaluated for their eligibility for listing in the CRHR or local register prior to project development. The records search will help identify any recorded sites/resources that may be impacted by a project. A historian or architectural historian, per the Secretary of Interior's Professional Qualification Standards for Architectural History, shall perform a records search and site investigation to identify potentially eligible historical sites/resources within a quarter-mile of a project site. The principal records search shall be conducted using the California Historical Resources Information System (CHRIS). The South Central Coastal Information Center (SCCIC) at California State University Fullerton administers the historical records for Los Angeles County and is the preferred location to conduct the historical records search.

To supplement the CHRIS records search, at a minimum, the following sources shall be searched:

- NRHP
- National Park Service online website
- Office of Historic Preservation
- California Historical Landmarks
- California Points of Historical Interest
- Local historical societies
- Local registers and general plans
- Sanborn maps (available at the Los Angeles Public Library)
- Historic U.S. Geological Survey quadrangles
- Historic aerial maps

If no designated eligible or historic resources are identified during this assessment, no further mitigation shall be required.

MM CR-2: Avoid Historic Resources. If eligible historical resources, as defined by CEQA, are identified, demolition or substantial alteration of such resources shall be avoided. This may require redesign of the proposed project to provide adequate buffer as to not significantly alter the historical resource.

MM CR-3: Prepare and Implement a Historic Resources Mitigation Plan. If avoidance is determined to be infeasible, the project proponent shall prepare a treatment plan to include, but not be limited to, photo-documentation and public interpretation of the resource. The plan shall be submitted to the local jurisdiction in which the project is proposed as part of the Plan Review process for review and approval prior to implementation. Required plan elements include the following:

- Survey or photographic documentation of the historical resource before construction begins as a baseline condition for assessing damage.
- Preparation of protocols for the documentation of inadvertent damage, should it occur, as well as notification to the appropriate owner and/or jurisdiction.
- Strategy for repair of historical resource in accordance with the Secretary of the Interior Standards.

MM AQ-1: Emission Reduction Measures, described above.

MM NOI-1, described below.

7.4.2 Impact – Cultural Resources (b) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction)

Depending on the size, design, and location of a project, as well as any potential cultural resources that may be at or near a future project site, construction of the greenway paths, amenities, pocket parks and greenspaces, safe crossings, stormwater management facilities have the potential to demolish or materially alter the significance of an archaeological resource, through both direct destruction of the resource or indirectly due to localized dust and vibration. To avoid and/or minimize impacts to such resources, project proponents would be required to implement **MM CR-4: Cultural Resources Assessment** and conduct a site-specific records search and pedestrian survey of the project site in advance of construction activity. If no potential resources are identified in the assessment, the potential for impacts would be considered less than significant. However, implementation of **MM CR-6: Monitoring** would be required to ensure that any unanticipated archaeological discoveries are handled appropriately. If the results from the site-specific assessment indicate resources are present on a project site, implementation of **MM CR-5: Avoid Cultural Resources, Prepare Treatment Plan** would ensure the project is either redesigned to avoid known resources or a treatment plan is prepared to effectively mitigate impacts to the resources. Project proponents would also be required to implement **MM CR-7: Unanticipated Discovery** in the event other unanticipated discoveries of archaeological resources occur during construction.

7.4.2.1 Finding

Changes or alterations have been required in, or incorporated into, the proposed Project to avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, resulting in a less than significant impact.

7.4.2.2 Mitigation Measure(s)

Pursuant to State CEQA Guidelines Section 15091, the following mitigation measures have been included in an MMRP that is to be adopted concurrently with these findings.

MM CR-4: Cultural Resources Assessment. Construction activities that result in ground disturbance have the potential to impact buried archaeological resources. A qualified archaeologist shall conduct an archaeological inventory and assessment per the Secretary of the Interior's Professional Qualifications Standards for Archaeology, for any project that would result in ground disturbance. The assessment shall include a records search of CHRIS, at the SCCIC at California State University Fullerton which administers the historical records for Los Angeles County.

If a location has been previously surveyed and no cultural resources have been recorded on it, no further cultural resources studies shall be required. If a location has not been previously surveyed based on the records search information, an intensive (100 percent) pedestrian ground surface survey (Phase I survey/Class III inventory) by qualified archaeologists shall be required. All archaeological/cultural resources identified during the site survey will be recorded, pursuant to the California Department of Parks and Recreation and applicable local/municipal guidance.

Any newly encountered archaeological resources shall be evaluated by a qualified archaeologist for their eligibility for listing in the CRHR or NRHP and for significance as a historical resource or unique archaeological resource per State CEQA Guidelines Section 15064.5. Recommendations shall be made for treatment of these resources if found to be significant, in consultation with the implementing agency. If, following the records search, literature review, and field survey, it is determined that there are no archaeological present in the project area, then no further action would be required.

MM CR-5: Avoid Cultural Resources, Prepare Treatment Plan. If a significant resource is present, the preferred treatment is to avoid the site/resource to preserve it in place, pursuant to State CEQA Guidelines Section 15126.4(b)(3). This may require redesign of the proposed project.

In accordance with State CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, a qualified archaeologist shall develop additional treatment measures, which may include data recovery or other appropriate measures, in consultation with the project proponent. For sites with archaeological resources that cannot be avoided, the project proponent shall prepare an Archaeological Evaluation and Treatment Plan, in coordination with the qualified archaeologist, that describes methods and procedures for conducting subsurface excavations to determine the vertical and horizontal extents of an archaeological site. The draft plan shall be provided for review to any tribes that expressed interest in prehistoric or tribal resources. Implementation of such a plan may include mechanical and/or manual excavations to provide data on the cultural constituents at the site and the depositional context of such materials (if found to exist). This data can be used to determine the integrity of the site and make a formal evaluation based on the eligibility criteria set forth in CEQA and

Section 106 of the National Historic Preservation Act (NHPA) for inclusion in the CRHR and NRHP. The Archaeological Evaluation and Treatment measures should define the parameters of archaeological testing at the site and the extent of excavation and analysis of any materials recovered. The Archaeological Evaluation and Treatment measures must also include guidelines for treatment and curation of any materials recovered during the testing process. Subsequent to implementation of the Archaeological Evaluation and Treatment measures, a technical report describing the methods and results of archaeological testing and formal evaluations of the archaeological sites and recommendations for further treatment will be completed.

MM CR-6: Monitoring. A Secretary of the Interior-qualified archaeologist or archaeological monitor working under the direction of a Secretary of the Interior-qualified archaeologist shall be retained by the implementing agency. The archaeologist or archaeological monitor, either meeting or working under the direction of an archaeologist who meets the Secretary of the Interior Professional Qualification Standards in archaeology, shall monitor ground disturbing activities in areas with potential for archaeological resources.

MM CR-7: Unanticipated Discovery of a Cultural Resource. If a cultural resource is discovered inadvertently during construction, all work in the immediate vicinity of the find (within a 60-foot buffer) shall stop until a Secretary of Interior -qualified archaeologist can evaluate the significance of the find. Work on other portions of the project outside the buffered area may continue during this assessment period. If the find is determined to be significant, the project proponent shall prepare a treatment plan in accordance with MM CR-5 described above.

7.4.3 Impact – Cultural Resources (c) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction)

While the Plan Area is mostly urbanized and the probability of an inadvertent discovery of human remains encountered during ground disturbing construction activities is low, in the unlikely event that human remains are inadvertently encountered, impacts due to construction could be significant. Implementation of **MM CR-8**: **Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects** would require that project proponents handle such remains according to the protocols set forth in State CEQA Guidelines Section 15064.5(e).

7.4.3.1 Finding

Changes or alterations have been required in, or incorporated into, the proposed Project to avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, resulting in a less than significant impact.

7.4.3.2 Mitigation Measure(s)

Pursuant to State CEQA Guidelines Section 15091, the following mitigation measures have been included in an MMRP that is recommended for to be adoption concurrently with these findings.

MM CR-8: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects. If human remains and/or grave goods are discovered or recognized during project construction, the implementing agency shall immediately halt all work in the immediate vicinity (within a 100-foot buffer of the find), contact the Los Angeles County Coroner to evaluate the remains, and follow the procedures and protocols set forth in State CEQA Guidelines Section 15064.5(e). If the County Coroner determines that the remains are Native American, the implementing agency shall contact the NAHC, in accordance with Health and Safety Code Section 7050.5(c) and PRC Section 5097.98 (as amended by AB 2641). The NAHC shall designate a Most Likely Descendant for the remains per PRC Section 5097.98. Per PRC Section 5097.98, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains and any associated grave goods are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred with the Most Likely Descendant regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The Most Likely Descendant shall make recommendations to the District within 48 hours for the treatment or disposition, with property dignity, of the human remains and/or grave goods, which shall be implemented in accordance with PRC Section 5097.98 and Section 15064.5(e) of the State CEQA Guidelines. If the Most Likely Descendant fails to make recommendations within 48 hours, the County may reinter the remains in an area of the property not subject to further disturbance. If the remains are determined to be neither of forensic value to the Coroner, nor of Native American origin, provisions of the CHSC (Section7100 et seq.) directing identification of the next-of-kin will apply. The NAHC is authorized to resolve any disputes regarding the disposition of such remains, pursuant to Section 15064.5(e) of the State CEQA Guidelines. Work may resume at the implementing agency's discretion but will commence only after consultation and treatment have been concluded. Work may continue on other parts of the project while consultation and treatment are conducted.

7.5 Energy

7.5.1 Impact – Energy (a) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Operations)

Operation of greenway paths and greenway amenities would require energy for the conveyance of water for landscaping and restrooms, electricity for lighting and appliances, and the use of fuels or electric charging for landscape equipment and mobile sources. Demand for energy would vary depending on the size and intensity of use of each project. All projects would be required to conform to California Energy Code for energy-efficiency as well as CALGreen Code for new building structures, such as restrooms. To further reduce energy demand associated with Plan components, the *Design Guidelines and Standards* specify solar-powered lighting fixtures for Plan projects. In addition, implementation of **MM GHG-1: Implement Section-Specific Operations GHG Emissions Reduction Strategies** would require that all new buildings and/or retrofit of existing buildings, such as restrooms, are of all-electric design with use of only ENERGY STAR rated appliances for appliance types that are offered ENERGY STAR ratings.

7.5.1.1 Finding

Changes or alterations have been required in, or incorporated into, the proposed Project to avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, resulting in a less than significant impact.

7.5.1.2 Mitigation Measure(s)

Pursuant to State CEQA Guidelines Section 15091, the following mitigation measures have been included in an MMRP that is to be adopted concurrently with these findings.

MM GHG-1: **Implement Section-Specific Operations GHG Emissions Reduction Strategies**, described below.

7.5.2 Impact – Energy (b) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Operations)

Energy demands for Plan components could result in significant impacts, however with mitigation this is reduced to less than significant. The implementation of **MM GHG-1: Implement Section-Specific Operations GHG Emissions Reduction Strategies** would ensure that operation of greenway paths and amenities, pocket parks and greenspace, safe crossings, and stormwater management would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

7.5.2.1 Finding

Changes or alterations have been required in, or incorporated into, the proposed Project to avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, resulting in a less than significant impact.

7.5.2.2 Mitigation Measure(s)

Pursuant to State CEQA Guidelines Section 15091, the following mitigation measures have been included in an MMRP that is to be adopted concurrently with these findings.

MM GHG-1: Implement Section-Specific Operations GHG Emissions Reduction Strategies, described below.

7.6 Geology and Soils

7.6.1 Impact – Geology and Soils (f) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction and Operations)

The entire Plan Area could contain deposits considered sensitive for containing significant unrecorded paleontological vertebrate fossils or other unique geological features. Sensitive paleontological deposits likely exist at various depths below the current ground surface within the Plan Area. The County has

identified two significant fossil localities in the vicinity of the Plan Area. Both are within the Puente Formation: one in the Hacienda Heights and the other in the Diamond Bar areas of Puente Hills. With implementation of **MM GEO-1: Pre-Construction Paleontological Resources Investigation** and **MM GEO-2: Avoid or Monitor/Curate Paleontological Resources**, the site-specific conditions of paleontological and other unique geological features would be identified, and if necessary either the area would be avoided, or monitored during construction and if paleontological or other unique geological features are encountered, they will be curated. Operation activities related to projects implemented under the Plan could include new single-story structures, such as shade structures and restrooms and lower-profile infrastructure (e.g., trails, signs, lighting, benches, gardens, etc.) which may introduce activities that could directly affect significant paleontological resources. If significant impacts on a newly exposed or existing significant paleontological resource cannot be avoided, then **MM GEO-3: Avoid/Minimize Impacts on Paleontological Resources During Operations** would be implemented to reduce impacts to less than significant.

7.6.1.1 Findings

Changes or alterations have been required in, or incorporated into, the proposed Project to avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, resulting in a less than significant impact.

7.6.1.2 Mitigation Measure(s)

Pursuant to State CEQA Guidelines Section 15091, the following mitigation measures have been included in an MMRP that is to be adopted concurrently with these findings.

MM GEO-1: Pre-Construction Paleontological Resources Investigation. During design of individual proposed projects with excavation in the Hacienda Heights or the Diamond Bar areas of Puente Hills, and prior to construction, the project proponent shall contract with a qualified paleontologist or registered geologist to conduct paleontological resource investigation consistent with Society of Vertebrate Paleontology Guidelines. If sensitive deposits are identified and could be affected by the proposed project in the Plan Area, **MM GEO-3** shall be implemented.

MM GEO-2: Avoid or Monitor Paleontological Resources. If sensitive deposits are identified in excavations in the Hacienda Heights or the Diamond Bar areas of Puente Hills and could be affected by the proposed project, the implementing agency will redesign the subsequent project to avoid sensitive paleontological resources and deposits that could potentially contain these resources. If avoidance and/or project redesign is not feasible, then paleontological monitoring will be implemented.

If sensitive deposits are identified and avoidance and/or project redesign is not feasible, prior to ground-disturbing activities, the project proponent shall retain a qualified paleontologist to be available "on-call" during excavation and ground-disturbing activities that occur in undisturbed deposits below ground surface, the extent of which will be determined based on review of the geotechnical report/paleontological resource investigation, and to inspect exposures for contained fossils. In the event that paleontological resources are discovered, work will be halted, the lead implementing agency will be notified immediately, and the implementing agency will consult with the qualified paleontologist to assess the significance of the find according to Section 15064.5 of the State CEQA Guidelines. If any

find is determined to be significant, the implementing agency and the paleontologist will determine appropriate avoidance measures or other appropriate mitigation. The implementing agency will make the final determination. All significant paleontological materials recovered will be reviewed, evaluated, and documented according to current professional standards by the consulting paleontologist and discussed with the implementing agency. The implementing agency will make the final determination. Based on observations, monitoring may be reduced or discontinued if the qualified paleontologist determines that the possibility of encountering fossiliferous deposits is low.

MM GEO-3: Avoid/Minimize Impacts on Paleontological Resources During Operations. If significant paleontological resources or sensitive deposits with the potential to contain significant paleontological resources are identified within a proposed project area with excavation in the Hacienda Heights or the Diamond Bar areas of Puente Hills in the Plan Area during design/planning of individual projects (**MM GEO-1: Pre-Construction Paleontological Resources Investigation** and **MM GEO-2: Avoid or Monitor Paleontological**), and sensitive deposits remain exposed at or near the ground surface, the project proponent, in coordination with the qualified paleontologist, shall prepare an avoidance and minimization plan to avoid and/or minimize potential impacts during operations. This plan may include, but not be limited to:

- Preparing an operations and maintenance plan to minimize degradation and exposure of sensitive deposits
- Designing and developing interpretive exhibits to provide education and understanding of the importance of avoiding and protecting sensitive deposits and paleontological resources
- Create Environmentally Sensitive Areas around the paleontological resources. Generally, the Environmentally Sensitive Area would be secured using some combination of exclusionary fencing or monitoring as an alternative to excavation/removal.

7.7 Greenhouse Gas Emissions

7.7.1 Impact – Greenhouse Gas Emissions (a) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction and Operations)

Construction of the greenway paths and greenway amenities would generate GHG emissions from the use of heavy-duty construction equipment, construction worker vehicle trips, material deliveries, and trips by heavy-duty haul trucks. For projects implemented within unincorporated LA County, with implementation of **MM AQ-1: Emissions Reduction Measures**, and **MM GHG-1: Implement Section-Specific Operations GHG Emissions Reduction Strategies**, as well as conformance with the *Design Guidelines and Standards*, construction and operation of greenway paths and greenway amenities within unincorporated LA County would be consistent with the 2045 Climate Action Plan (CAP) when carried out by the County and thus would not result in GHG emissions that would have a significant effect on the environment.

7.7.1.1 Findings

Changes or alterations have been required in, or incorporated into, the proposed Project to avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, resulting in a less than significant impact.

7.7.1.2 Mitigation Measure(s)

Pursuant to State CEQA Guidelines Section 15091, the following mitigation measures have been included in an MMRP that is to be adopted concurrently with these findings.

MM AQ-1: Emission Reduction Measures, described above.

MM GHG-1: Implement Section-Specific Operations GHG Emissions Reduction Strategies would require that all new buildings and/or retrofit of existing buildings, such as restrooms, are of all-electric design with use of only ENERGY STAR rated appliance for appliance types that are offered ENERGY STAR ratings. This mitigation measure would also further reduce area energy use through water conservation and waste reduction measures. Further, maintenance would include routine inspection and maintenance of the greenway paths and amenities to remove trash/debris and landscaping. This measure also includes several energy conservation measures to be implemented in project design as well as requiring that maintenance and operations activities that use landscaping equipment (e.g., lawn mowers, trimmers) shall employ electric landscaping equipment. During maintenance, idling times on all diesel-fueled commercial vehicles over 10,000 pounds shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California airborne toxics control measure 13 CCR Section 2485). In addition, idling times on all diesel-fueled off-road vehicles over 25 hp shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes and fleet operators must develop a written policy as required by the "CARB Off-Road Diesel Regulations".

7.7.2 Impact – Greenhouse Gas Emissions (b) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction and Operations)

Projects within the Plan area that are demonstrated to be consistent with the 2045 CAP would also be consistent with the 2022 Scoping Plan Update, SB 32, and AB 1279. Specifically, the targets and carbon neutrality goal in the 2045 CAP align with various state, regional, and County targets for 2030, 2035, and 2045. Since the 2045 CAP is a qualified CAP, and the Plan would be consistent with applicable actions with incorporation of **MM AQ-1: Emissions Reduction Measures**, and **MM GHG-1: Implement Section-Specific Operations GHG Emissions Reduction Strategies**, construction and operation of greenway paths and greenway amenities; greenway paths + pocket parks and greenspaces; greenway paths + safe crossings; and greenway paths + stormwater management would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

7.7.2.1 Findings

Changes or alterations have been required in, or incorporated into, the proposed Project to avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, resulting in a less than significant impact.

7.7.2.2 Mitigation Measure(s)

Pursuant to State CEQA Guidelines Section 15091, the following mitigation measures have been included in an MMRP that is to be adopted concurrently with these findings.

MM AQ-1: Emission Reduction Measures, described above.

MM GHG-1: Implement Section-Specific Operations GHG Emissions Reduction Strategies, as described above.

7.8 Hazards and Hazardous Materials

7.8.1 Impact – Hazards and Hazardous Materials (b) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction)

Hazardous materials sites with a potential for contaminated onsite soil and/or groundwater exist within the Plan area, and oil wells are present in the vicinity of the Plan Area. Because the exact location and design of projects that would be implemented under the Plan have not yet been determined, future projects could be located on sites with contaminated soil and/or groundwater and ground-disturbing (grading or excavation) activities conducted during construction could encounter contaminated soil or groundwater. Implementation of **MM HAZ-1: Pre-construction Hazardous Site Records Search** would identify if the project site is located on or near a hazardous materials site. If the site is located on or near a hazardous site and is determined to present a potential risk, then additional engineering controls and **MM HAZ-2: Phase I/II Environmental Site Assessment** and **MM HAZ-3: Soil and Groundwater Management Plan** should be incorporated as necessary. Implementation of **MM HAZ-2: Phase I/II Environmental Site Assessment**, which consists of a Phase I Environmental Site Assessment, would provide recommendations for further assessment or mitigation measures to assess or mitigate potential environmental impacts under the oversight of the applicable regulatory agency, as necessary.

7.8.1.1 Findings

Changes or alterations have been required in, or incorporated into, the proposed Project to avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, resulting in a less than significant impact.

7.8.1.2 Mitigation Measure(s)

Pursuant to State CEQA Guidelines Section 15091, the following mitigation measures have been included in an MMRP that is to be adopted concurrently with these findings.

MM HAZ-1: Pre-construction Hazardous Site Records Search. Prior to ground disturbance at each proposed project site, a database search pursuant to California Government Code Section 65962.5 shall be conducted to identify if the project site is located on or near a hazardous materials site and to determine the applicability of any regulatory requirements or hazardous material risks associated with the construction site or the adjacent sites. If the site is not located on or adjacent to a hazardous materials site or is determined not to present a risk to the public or environment, no further action would be necessary. If the site is located on or near a hazardous site and is determined to present a potential risk, then additional engineering controls may be necessary, including **MM HAZ-2: Phase I/II Environmental Site Assessment** and **MM HAZ-3: Soil and Groundwater Management Plan** as appropriate.

MM HAZ-2: Phase I/II Environmental Site Assessment. Prior to ground disturbance, a Phase I Environmental Site Assessment shall be conducted in conformance with industry-accepted practices, American Society of Testing Materials (ASTM) Designation E1527-05, and the USEPA All Appropriate Inquiry Rule (40 CFR Section 312). Based on the Phase I Environmental Site Assessment findings, recommendations for further assessment (i.e., Phase II Environmental Site Assessment) or mitigation measures shall be recommended, as appropriate.

MM HAZ-3: Soil and Groundwater Management Plan. Should the assessments required under MM HAZ-2 above reveal chemicals of concern above applicable clean-up goals, or should unanticipated contamination be found during site excavation, a Soil and Groundwater Management Plan shall be prepared. The Soil and Groundwater Management Plan shall be implemented prior to, during, and after excavation and grading activities on the Project Site to ensure that any contaminated soils are properly identified (type and extent), excavated, and disposed of off-site. The sampling program shall include the following:

- Health and safety plan that specifies pre-field activities (e.g., marking of boring locations, obtaining utility clearance) and field activities (e.g., sampling procedures, health and safety measures, soil stockpile management, etc.)
- Necessary permits for well installation and/or boring advancement
- A soil sampling and analysis plan, including chemical testing methods, and quality assurance/quality control procedures. Laboratory analyses to be conducted by a State-certified laboratory
- Hazardous material handling and disposal processes, including appropriate certified hazardous material hauling (transport) and disposal/recycling facilities

7.8.2 Impact – Hazards and Hazardous Materials (c) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction)

There are numerous schools within and in vicinity of the Plan Area. To avoid exposure at nearby schools once a future project location site is identified, project proponents shall implement **MM HAZ-1: Pre-construction Hazardous Site Records Search** to identify if the project site is located on or near a hazardous materials site. If the site is located on or near a hazardous site and it is determined that ground disturbance could pose a risk of emission of hazardous materials, then the project proponent shall implement **MM HAZ-2: Phase I/II Environmental Site Assessment,** which consists of a Phase 1 Environmental Assessment (and subsequently, a Phase II as necessary) and implement **MM HAZ-3: Soil**

and Groundwater Management Plan to further ensure that any contaminated soils are properly identified, excavated, and disposed of off-site. Impacts would be less than significant with mitigation.

7.8.2.1 Findings

Changes or alterations have been required in, or incorporated into, the proposed Project to avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, resulting in a less than significant impact.

7.8.2.2 Mitigation Measure(s)

Pursuant to State CEQA Guidelines Section 15091, the following mitigation measures have been included in an MMRP that is to be adopted concurrently with these findings.

MM HAZ-1: Pre-construction Hazardous Site Records Search, described above.

MM HAZ-2: MM HAZ-2: Phase I/II Environmental Site Assessment, described above.

MM HAZ-3: Soil and Groundwater Management Plan, described above.

7.8.3 Impact – Hazards and Hazardous Materials (d) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction)

Due to the unknown nature of specific projects within the Plan area, they have the potential to occur on hazardous materials sites compiled pursuant to Government Code Section 65962.5. To avoid exposure and risk to workers, the public, and the environment, a desktop review of the project-site shall be conducted to identify the proximity of hazardous locations to the site **(MM HAZ-1: Pre-construction Hazardous Site Records Search)**. If the site is located on or adjacent to a hazardous site and it is determined that ground disturbance could pose a risk of exposure of workers or the public to contaminated media, then the project proponent shall conduct a Phase I Environmental Site Assessment and subsequently Phase II Environmental Site Assessment **(MM HAZ-2: Phase I/II Environmental Site Assessment)**, as necessary, and prepare and draft a Soil and Groundwater Management Plan (**MM HAZ-3: Soil and Groundwater Management Plan**). With the implementation of these measures, impacts would be reduced to less than significant levels.

7.8.3.1 Findings

Changes or alterations have been required in, or incorporated into, the proposed Project to avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, resulting in a less than significant impact.

7.8.3.2 Mitigation Measure(s)

Pursuant to State CEQA Guidelines Section 15091, the following mitigation measures have been included in an MMRP that is to be adopted concurrently with these findings.

MM HAZ-1: Pre-construction Hazardous Site Records Search, described above.

MM HAZ-2: MM HAZ-2: Phase I/II Environmental Site Assessment, described above.

MM HAZ-3: Soil and Groundwater Management Plan, described above.

7.8.4 Impact – Hazards and Hazardous Materials (f) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction)

Depending on individual project locations, construction activities have the potential to temporarily restrict access for emergency vehicles traveling to and around future project sites. Temporary lane closures for vehicle, bike, or pedestrian traffic may be required. Temporary lane closures and construction-related traffic causing delays or obstructing the movement of emergency vehicles, could impair emergency access in the Plan Area, resulting in potentially significant impacts to emergency response. Implementation of **MM WF-1: Construction Coordination with Emergency and Fire Services** would require that the relevant emergency response services are consulted prior to construction and are able to identify necessary measures to prevent the impairment of emergency response.

7.8.4.1 Findings

Changes or alterations have been required in, or incorporated into, the proposed Project to avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, resulting in a less than significant impact.

7.8.4.2 Mitigation Measure(s)

Pursuant to State CEQA Guidelines Section 15091, the following mitigation measures have been included in an MMRP that is to be adopted concurrently with these findings.

MM WF-1, described below.

7.9 Mineral Resources

7.9.1 Impact – Mineral Resources (a) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction)

Although the Plan Area contains MRZ-2 zones, which include known mineral deposits or where there is a high likelihood for their presence, Plan infrastructure would be predominantly located within areas that are already urbanized, and would therefore not be available for mineral resource extraction. Implementation of **MM MR-1: Ensure Access to Mineral Resources** would require all project proponents to review site plans for mineral resource with sites identified by the state, local General Plan, Specific Plan, or other land use plan prior to construction and permit approvals.

7.9.1.1 Findings

Changes or alterations have been required in, or incorporated into, the proposed Project to avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, resulting in a less than significant impact.

7.9.1.2 Mitigation Measure(s)

Pursuant to State CEQA Guidelines Section 15091, the following mitigation measures have been included in an MMRP that is to be adopted concurrently with these findings.

MM MR-1: **Ensure Access to Mineral Resources.** The project proponent shall ensure that final project design does not restrict access to known mineral resource sites.

7.9.2 Impact – Mineral Resources (b) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction)

Projects would generally need to comply with the local municipality's and County general plan and zoning ordinances, such as restrictions for projects to be sited on mineral resource sites or ensure access to a known mineral resource site, but the specific applicable restrictions would depend on final design and configuration of individual projects proposed under the Plan. Jurisdictions that do not contain policies regarding mineral resources in their general plan have determined the land covered by their plan is fully developed with no potential for extraction, and the applicable general plans do not provide for extraction. However, projects under the Plan may be implemented by a city which are without mineral resource review, the County or another public entity that is not subject to local general plans or zoning ordinances of cities and therefore, could have a potentially significant and unavoidable impact if it restricts access to a mineral resource. Implementation of **MM MR-1: Ensure Access to Mineral Resources** would require all project proponents to review site plans for mineral resource sites delineated on a local General Plan, Specific Plan, or other land use plan prior to construction and permit approvals.

7.9.2.1 Findings

Changes or alterations have been required in, or incorporated into, the proposed Project to avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, resulting in a less than significant impact.

7.9.2.2 Mitigation Measure(s)

Pursuant to State CEQA Guidelines Section 15091, the following mitigation measures have been included in an MMRP that is to be adopted concurrently with these findings.

MM MR-1: Ensure Access to Mineral Resources, described above.

7.10 Public Services

7.10.1 Impact – Public Services (a) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction)

No fire protection facilities, police protection facilities, schools, parks, libraries, or other public facilities are located within the District ROW, where all would occur within District ROWs and adjacent parcels. While the Plan does not propose to demolish, relocate, or retire any existing public facilities on adjacent parcels, construction activities would occur within densely populated areas and could temporarily disrupt the provision of fire response and police response services by restricting access to construction areas, resulting in potentially significant impacts such as delayed response times. Implementation of **MM TR-4: Notify Emergency Personnel of Road Closures** would require project proponents to coordinate with police/fire/emergency responders prior to any temporary road closures during construction in order to proactively address and prevent potential delays in response times.

7.10.1.1 Findings

Changes or alterations have been required in, or incorporated into, the proposed Project to avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, resulting in a less than significant impact.

7.10.1.2 Mitigation Measure(s)

Pursuant to State CEQA Guidelines Section 15091, the following mitigation measures have been included in an MMRP that is to be adopted concurrently with these findings.

MM TR-4: **Notify Emergency Personnel of Road Closures**, as described below.

7.11 Recreation

7.11.1 Impact – Recreation (a) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction)

Portions of the Plan Area have limited available park land based on current standards, and construction of projects under the Plan could result in partial closures of existing recreational areas or facilities at the points of connection where the Plan components would connect to those existing recreational facilities; however, the details would be highly dependent on the size and final configuration of a proposed project. Implementation of **MM REC-1: Coordinate with Parks Departments/Agencies** would allow recreational facilities to plan for potential temporary disruptions, as needed, and to plan for additional maintenance at nearby recreational facilities to ensure any increases in use do not result in physical deterioration of the facility.

7.11.1.1 Findings

Changes or alterations have been required in, or incorporated into, the proposed Project to avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, resulting in a less than significant impact.

7.11.1.2 Mitigation Measure(s)

Pursuant to State CEQA Guidelines Section 15091, the following mitigation measures have been included in an MMRP that is to be adopted concurrently with these findings.

MM REC-1: Coordinate with Parks Departments/Agencies. Project proponents shall notify park agencies in advance of the nature, extent, and duration of construction activities that may affect parks, trails and other recreational facilities in order to minimize disruptions of recreational uses during construction activity and ensure adequate planning with regard to any needs for temporary increased levels of maintenance activity.

7.12 Utilities and Service Systems

7.12.1 Impact – Utilities and Service Systems (a) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings (Construction and Operations), and Greenway Paths + Stormwater Management (Construction)

Greenway paths would be constructed within the District ROW (including fee property and easements), project proponents would be required to obtain a Flood Permit from the District (excluding projects completed by the District, as the District does not permit itself). The implementation of **MM UTL-1: Prepare and Implement Utilities Plan** would ensure that all existing utilities are identified and avoided or addressed safely and in compliance with District, County, and local rules and regulations**.** To further reduce energy demand associated with Plan components, the *Design Guidelines and Standards* specify solar-powered lighting fixtures for Plan projects and provide guidance for ensuring vegetation is water efficient and suited for the climate of the Plan Area. Furthermore, energy and water use would be greatly reduced by implementation of **MM GHG-1: Implement Section-Specific Operations GHG Emissions Reduction Strategies**, which requires the implementation of emissions reduction strategies for future projects to significantly reduce the consumption of energy and water and reduce waste.

7.12.1.1 Findings

Changes or alterations have been required in, or incorporated into, the proposed Project to avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, resulting in a less than significant impact.

7.12.1.2 Mitigation Measure(s)

Pursuant to State CEQA Guidelines Section 15091, the following mitigation measures have been included in an MMRP that is to be adopted concurrently with these findings.

MM UTL-1: Prepare and Implement Utilities Plan. Utilities searches are required for all projects occurring on District ROW. For those projects proposed for adjacent parcels, project proponents shall conduct utilities search to identify the location of existing utilities in the project area and determine if construction activity would impact existing utility lines. If results show no impact, project shall proceed. If potential impact is identified or if new/expanded infrastructure is required for project implementation, the proponent shall prepare a utilities plan during design that:

- Identifies the location of existing utilities and connections and new/expanded infrastructure that will be required to connect to existing services
- Quantifies demand and generation factors for construction of the new/expanded infrastructure on a project-specific basis and determine whether supply/capacity can meet demand
- Identifies project modifications that will minimize any significant environmental impact on utilities

As part of the utilities plan, the project proponent shall prepare a utilities report that compares the expected operational demand and generation for the various utility resources against existing supply and infrastructure to determine whether sufficient capacity exists to accommodate the project; if any insufficiency is identified, the project proponent shall modify the project to avoid the impact in consultation with the affected utility provider(s) and in compliance with site-specific conservation features above those required by the applicable codes and ordinances.

MM GHG-1: Implement Section-Specific Operations GHG Emissions Reduction Strategies, described above.

7.12.2 Impact – Utilities and Service Systems (b) Greenway Paths + Pocket Parks and Greenspaces (Construction and Operations)

With implementation of **MM UTL-1: Prepare and Implement Utilities Plan**, and **MM UTL-2: Evaluate Downstream Beneficial Uses**, the inclusion of a pocket park (the typical 1-acre park or the larger 25-acre park summarized above in impact (a) would not be expected to result in significant environmental impacts due to the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities above that already described for greenway paths and amenities.

7.12.2.1 Findings

Changes or alterations have been required in, or incorporated into, the proposed Project to avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, resulting in a less than significant impact.

7.12.2.2 Mitigation Measure(s)

Pursuant to State CEQA Guidelines Section 15091, the following mitigation measures have been included in an MMRP that is to be adopted concurrently with these findings.

MM UTL-1: Prepare and Implement Utilities Plan, described above.

MM UTL-2: Evaluate Downstream Beneficial Uses. Prior to selection of a stormwater BMP, project proponents shall evaluate the potential for impacts to downstream beneficial uses, including surface

water rights, and shall not select BMPs that result in preventing access to previously appropriated surface water downstream.

MM GHG-1: Implement Section-Specific Operations GHG Emissions Reduction Strategies, described above.

7.12.3 Impact – Utilities and Service Systems (c) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Operations)

No new habitable structures are proposed which could increase population in the Plan Area and it is anticipated that visitors to projects implemented under the Plan would be current residents of the area and would not increase the demand for wastewater services. Accordingly, operation of a project that includes a greenway path and amenities such as a restroom or water fountains is not anticipated to result in a load that exceeds wastewater treatment capacity. For operations, **MM UTL-1: Prepare and Implement Utilities Plan** would ensure that all existing utilities are identified and avoided or addressed safely and in compliance with District, County, and local rules and regulations.

7.12.3.1 Findings

Changes or alterations have been required in, or incorporated into, the proposed Project to avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, resulting in a less than significant impact.

7.12.3.2 Mitigation Measure(s)

Pursuant to State CEQA Guidelines Section 15091, the following mitigation measures have been included in an MMRP that is to be adopted concurrently with these findings.

MM UTL-1: Prepare and Implement Utilities Plan, described above.

SECTION 8 Significant and Unavoidable Impacts

The PEIR identifies certain activities that would potentially result in significant and unavoidable impacts during project construction or operation. In most instances, a significant and unavoidable impact would only occur in specific circumstances for future projects implemented under the Plan, such as a future project proposed within the Plan Area adjacent to sensitive receptors, or future projects implemented by the County or other entity that may not be subject to local jurisdiction zoning and municipal codes and thus may propose a future project which conflicts with existing zoning and ordinances. In these cases, even with the implementation of identified mitigation measures, impacts may not be reduced to less than significant levels. Where no mitigation measures are identified in the explanations for an impact below, no feasible mitigation measures were identified to avoid or minimize the subject impact.

8.1 Aesthetics

8.1.1 Impact – Aesthetics (c) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction and Operations)

In an urbanized area, depending on the specific location of individual Projects, because the County is not subject to the zoning and municipal codes of incorporated cities, a future Project could conflict with applicable zoning and other regulations governing scenic quality and impacts for both the construction and operations of projects would be potentially significant and unavoidable.

8.1.1.1 Findings

No changes or alterations have been required in, or incorporated into, the proposed Project that would avoid or substantially lessen the significant environmental effect as identified in the Final PEIR because the District ROW spans multiple jurisdictions and since the County is not subject to local zoning and regulations, the only way to avoid the impact would be to select the No Project Alternative, which would not realize the beneficial effects of the proposed Plan. Depending on the specific location of future projects within the Plan Area and because no feasible mitigation measures to avoid or lessen the potential conflicts were identified, impacts would be potentially significant and unavoidable.

8.1.1.2 Mitigation Measure(s)

None.

8.2 Agriculture and Forestry Resources

8.2.1 Impact – Agriculture and Forestry Resources (b) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction and Operations)

Depending on the specific location of individual Projects developed under the Plan, for all Plan components, impacts for both the construction and operations of Projects implemented under the Plan would be potentially significant and unavoidable. Projects developed under the Plan that constructed on urbanized land in the District ROW, and along streets, sidewalks, and in parks or other public lands or private lands adjacent to the District ROW that are not zoned for agricultural or forestry land uses would not result in any conflicts. However, it is possible the County or other public entity which is not subject to municipal zoning codes, could implement a project under the Plan If future projects are proposed on lands zoned for agriculture for which open space/recreational development is not a designated allowed or permitted use, the project proponent might be required to consult with CDOC and local municipalities to determine if zoning changes, conditional use permits, or agricultural offsets (e.g., easements, in-lieu mitigation, etc.) would be required to develop the parcel under the Plan. The County is not subject to permitting requirements and compliance with local jurisdiction land use codes, therefore, projects implemented by the County could conflict with existing zoning for agricultural use, which would be a significant and unavoidable impact.

8.2.1.1 Findings

No changes or alterations have been required in, or incorporated into, the proposed Project that would avoid or substantially lessen the significant environmental effect as identified in the Final PEIR because the District ROW spans multiple jurisdictions and since the County is not subject to local zoning and regulations, the only way to avoid the impact would be to select the No Project Alternative, which would not realize the beneficial effects of the proposed Plan. Depending on the specific location of future projects within the Plan Area and because no feasible mitigation measures to avoid or lessen the potential conflicts were identified, impacts would be potentially significant and unavoidable.

8.2.1.2 Mitigation Measure(s)

None.

8.2.2 Impact – Agriculture and Forestry Resources (c) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction and Operations)

Future projects implemented under the Plan would primarily be constructed and operated on urbanized public and private land primarily in the District ROW and on public and private parcels adjacent to the ROW, typically on other lands owned by municipalities within the Plan Area. Private parcels could be acquired in the future for the purposes of developing under the Plan. Greenway paths, amenities, and other components constructed and operated under the Plan may provide new connections to or amenities near forested areas, particularly urban forests and in some cases may include proposed trails

through said forests. Such proposed projects could potentially conflict with existing zoning for or cause rezoning of forest land. It is possible that the County or other public entity that is not subject to municipal zoning codes could implement projects that are proposed on lands categorized as forest, for which open space/recreational use is not a designated allowable use or permitted use, this would be considered a potentially significant impact. The proponent may be required to consult with local municipalities to determine if zoning changes, conditional use permits, or other regulatory processes would be required to develop the parcel under the Plan. The County is not subject to permitting requirements and compliance with local jurisdiction land use codes, therefore, projects implemented by the County could conflict with existing zoning for forest land which would be a significant and unavoidable impact.

8.2.2.1 Findings

No changes or alterations have been required in, or incorporated into, the proposed Project that would avoid or substantially lessen the significant environmental effect as identified in the Final PEIR because the District ROW spans multiple jurisdictions and since the County is not subject to local zoning and regulations, the only way to avoid the impact would be to select the No Project Alternative, which would not realize the beneficial effects of the proposed Plan. Depending on the specific location of future projects within the Plan Area and because no feasible mitigation measures to avoid or lessen the potential conflicts were identified, impacts would be potentially significant and unavoidable.

8.2.2.2 Mitigation Measure(s)

None.

8.2.3 Impact – Agriculture and Forestry Resources (d) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction and Operations)

Future projects implemented under the Plan would primarily be constructed and operated on urbanized public and private land primarily in the District ROW and/or on parcels adjacent to the ROW, typically on other lands owned by municipalities within the Plan Area. Private parcels could be acquired in the future for the purposes of developing under the Plan. Greenway paths, amenities, and other components constructed and operated under the Plan may provide new connections to or amenities near forested areas, particularly urban forests and in some cases may include proposed trails through these forests. Such proposed projects could potentially result in the conversion of forest land to non-forest use. Also, the County or other public entity that is not subject to local zoning codes could implement projects that are proposed on lands categorized as forest, for which open space/recreational use is not a designated allowable use or permitted use, this would be considered a potentially significant impact. The proponent may be required to consult with local municipalities to determine if zoning changes, conditional use permits, or other regulatory processes would be required to develop the parcel under the Plan. The County is not subject to permitting requirements and compliance with local jurisdiction land use codes; therefore, projects implemented by the County could result in the conversion of forest land to non-forest use, which would be a significant and unavoidable impact.

8.2.3.1 Findings

No changes or alterations have been required in, or incorporated into, the proposed Project that would avoid or substantially lessen the significant environmental effect as identified in the Final PEIR because the District ROW spans multiple jurisdictions and since the County is not subject to local zoning and regulations, the only way to avoid the impact would be to select the No Project Alternative, which would not realize the beneficial effects of the proposed Plan. Depending on the specific location of future projects within the Plan Area and because no feasible mitigation measures to avoid or lessen the potential conflicts were identified, impacts would be potentially significant and unavoidable.

8.2.3.2 Mitigation Measure(s)

None.

8.2.4 Impact – Agriculture and Forestry Resources (e) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction and Operations)

Projects implemented under the Plan would be constructed and operated on urbanized land in the District ROW and adjacent parcels; however, the acquisition of private parcels for development of projects under the Plan could result in impacts to agricultural land or forest land, as discussed previously under 2(a-d). It is possible that the County or other public entity that is not subject to local zoning may implement a project on lands categorized as forest or agricultural land, for which open space/recreation is not a designated allowable or permitted use, this would be considered a potentially significant impact. The proponent would be required to consult with local municipalities to determine if zoning changes, conditional use permits, or other regulatory processes would be required to develop the parcel under the Plan. The County is not subject to permitting requirements and compliance with local jurisdiction land use codes; therefore, projects implemented by the County could convert farmland to non-agricultural use or forest land to non-forest use, which would be a significant and unavoidable impact.

8.2.4.1 Findings

No changes or alterations have been required in, or incorporated into, the proposed Project that would avoid or substantially lessen the significant environmental effect as identified in the Final PEIR because the District ROW spans multiple jurisdictions and since the County is not subject to local zoning and regulations, the only way to avoid the impact would be to select the No Project Alternative, which would not realize the beneficial effects of the proposed Plan. Depending on the specific location of future projects within the Plan Area and because no feasible mitigation measures to avoid or lessen the potential conflicts were identified, impacts would be potentially significant and unavoidable.

8.2.4.2 Mitigation Measure(s)

None.

8.3 Air Quality

8.3.1 Impact – Air Quality (c) Greenway Paths + Pocket Parks and Greenspaces and Greenway Paths + Safe Crossings (Construction)

Depending on the location of Projects within the Plan Area, construction of Greenway Paths + Pocket Parks and Greenspaces, and Greenway Paths + Safe Crossings, would result in potentially significant and unavoidable impacts due to the exposure of sensitive receptors to pollution construction. For the construction of Greenway Paths + Parks and Greenspaces, implementation of **MM AQ-1: Emission Reduction Measures** would substantially reduce on-site emissions DPM from off-road equipment (the use of Tier 4 Final off-road diesel construction equipment reduces DPM emissions by at least 80 percent compared to the default CalEEMod fleet mix, which is composed of Tier 0 to Tier 2 equipment with higher DPM emissions). Requiring that construction equipment meet Tier 4 Final emissions standards, as well as ensuring compliance with the best management practices outlined in SCAQMD Rule 403 (Fugitive Dust), would ensure that construction of greenway paths, pocket parks, and greenspaces would not expose sensitive receptors to substantial pollutant concentrations. For projects that include 25-acre greenspaces that are within 1,000 feet of existing sensitive receptors, as defined by SCAQMD (e.g., residences, daycares), implementation of **MM AQ-2: Health Risk Assessment and Health Risk Reduction Measures** would require a site-specific construction Health Risk Assessment. For 25-acre greenspace projects that exceed the SCAQMD project-level thresholds, additional on-site mitigation shall be analyzed by the implementing agency to reduce risks to the greatest extent practicable. Because it cannot be concluded what the result of the project-level evaluation will be without speculation, it is possible that mitigation for future project health risks may be inadequate to reduce construction impacts below the SCAQMD's threshold level. For the construction of Greenway Paths + Safe Crossings, impacts would be significant and unavoidable. Implementation of **MM AQ-1: Emission Reduction Measures** would substantially reduce on-site emissions DPM from off-road equipment (the use of Tier 4 Final off-road diesel construction equipment reduces DPM emissions by at least 80 percent compared to the default CalEEMod fleet mix, which is composed of Tier 0 to Tier 2 equipment with higher DPM emissions). Requiring that construction equipment meet Tier 4 Final emissions standards, as well as ensuring compliance with the best management practices outlined in SCAQMD Rule 403 (Fugitive Dust), would ensure that construction of greenway paths, pocket parks, and greenspaces would not expose sensitive receptors to substantial pollutant concentrations. For safe crossings with anticipated construction duration of greater than two months that are within 1,000 feet of existing sensitive receptors, as defined by SCAQMD (e.g., residences, daycares), implementation of **MM AQ-2: Health Risk Assessment and Health Risk Reduction Measures** would require a site-specific construction Health Risk Assessment. For safe crossing projects that exceed the SCAQMD project-level thresholds, additional on-site mitigation shall be analyzed by the implementing agency to reduce risks to the greatest extent practicable. Because it cannot be concluded what the result of the project-level evaluation will be without speculation, it is possible that mitigation for future project health risks may be inadequate to reduce construction impacts below the SCAQMD's threshold level.

8.3.1.1 Findings

Although mitigation measures have been required in, or incorporated into, the proposed Project that would avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, depending on future project locations, impacts would be potentially significant and unavoidable.

8.3.1.2 Mitigation Measure(s)

MM AQ-1: Emission Reduction Measures, described above.

MM AQ-2: Health Risk Assessment and Health Risk Reduction Measures, described above.

8.4 Biological Resources

8.4.1 Impact – Biological Resources (e) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction)

Depending on location within the Plan Area, construction of Projects implemented under the Plan may result in significant and unavoidable impacts. Any protected trees within or near the project footprint would be identified during the desktop review (**MM BIO-1: Desktop Review and Surveys**), and the project proponent would implement **MM BIO-5: Conduct Biological Monitoring** as needed, to be consistent with local tree protection ordinances. However, at the program level, site-specific jurisdiction and the regulatory requirements are currently unknown and therefore could be potentially significant. Further, the County or other public entity that is not subject to municipal zoning codes may implement a project. Further projects implemented by the County are not subject to local regulations and even with mitigation, implementation may include the trimming or removal of trees in a manner that conflicts with local policies and ordinances. Therefore, impacts would be significant and unavoidable.

8.4.1.1 Findings

Although mitigation measures have been required in, or incorporated into, the proposed Project that would avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, depending on future project locations, impacts may still be potentially significant and unavoidable.

8.4.1.2 Mitigation Measure(s)

MM BIO-1: Desktop Review and Surveys, described above.

MM BIO-5: Conduct Biological Monitoring, described above.

8.5 Hazards and Hazardous Materials

8.5.1 Impact – Hazards and Hazardous Materials Impact 9(g). Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction and Operations)

Areas designated as Very High Fire Hazard Severity Zones (VHFHSZs) along the edge of the Angeles National Forest are within the Plan Area. Depending on individual project location, it can reasonably be assumed that staging areas and construction zones for greenway paths, greenway amenities, pocket parks and greenspaces, safe crossings, and stormwater management facilities could occur on the District ROW and adjacent parcels where they fall within or near lands classified as VHFSZ. Implementation of **MM WF-1: Construction Coordination with Emergency and Fire Services** would prepare local response agencies for responding to fires on project sites in the Plan Area. Electric utility construction would be conducted by qualified experts who would follow proper safety procedure required by CPUC and structures requiring electricity (primarily restrooms) would be required to be built in accordance with California Building Code requirements. To reduce the risk of fire during construction activity, project proponents shall implement **MM WF-2: Prepare a Construction Fire Protection Plan**. Nonetheless, construction associated with projects located in VHFHSZs would have the potential to exacerbate the existing wildfire risk which may expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. Therefore, construction impacts would be significant and unavoidable. Once operational, it's expected that future project sites would result in increases in daily users and increased bike and pedestrian traffic; therefore, if the future project is located within or adjacent to a VHFSZ, it could expose such visitors to hazardous conditions associated with the high risk of wildfire at the site who were not previously exposed to this risk. Operational impacts would also be significant and unavoidable.

8.5.1.1 Findings

Although mitigation measures have been required in, or incorporated into, the proposed Project that would avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, depending on future project locations, impacts may still be potentially significant and unavoidable.

8.5.1.2 Mitigation Measure(s)

MM WF-1: Construction Coordination with Emergency and Fire Services, as described above.

MM WF-2: Prepare a Construction Fire Protection Plan, as described above.

8.6 Land Use and Planning

8.6.1 Impact – Land Use and Planning (b) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction and Operations)

All greenway paths, greenway amenities, pocket parks, safe crossings, and stormwater management facilities would be developed within and adjacent to the District ROW. To construct a project on District ROW, a project proponent would generally be required to obtain a permit, lease, use agreement and/or other authorization from the District. In addition, portions of projects within incorporated areas would be under the land use jurisdiction of those incorporated cities and a project proponent may also have to apply for a land use permit or other approval from that the County or specific city, in addition to a permit from the District for the portion of the project is proposed to be located on District ROW. As discussed in Section 2.3.2, the *Design Guidelines and Standards* are focused on multi-use for pedestrians. For projects proposed entirely in the unincorporated County jurisdiction, compliance with the *Design Guidelines and Standards* would ensure compliance with County land use policies and impacts would be less than significant. However, for projects that are proposed in incorporated cities within the Plan Area, compliance with the *Design Guidelines and Standards* may conflict with the land use policies or regulations of the municipality in which the project is located. While land use permitting may be achieved through a conditional use permit, variance, zoning amendment, and/or specific plan amendment, these land use conflicts may result in significant and unavoidable impacts.

8.6.1.1 Findings

No changes or alterations have been required in, or incorporated into, the proposed Project that would avoid or substantially lessen the significant environmental effect as identified in the Final PEIR because the District ROW spans multiple jurisdictions and since the County is not subject to local zoning and regulations, the only way to avoid the impact would be to select the No Project Alternative, which would not realize the beneficial effects of the proposed Plan. Depending on the specific location of future projects within the Plan Area and because no feasible mitigation measures to avoid or lessen the potential conflicts were identified, impacts would be potentially significant and unavoidable.

8.6.1.2 Mitigation Measure(s)

None.

8.7 Noise

8.7.1 Impact – Noise (a) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction and Operations)

Depending on the location of a Project within the Plan Area and its proximity to sensitive receptors, short-term construction noise impacts could result from demolition activities; land clearing and grading; construction of greenway paths, greenway amenities, pocket parks, greenspaces, safe crossings, and

stormwater management; transportation of materials, workers, and equipment to the project site; and operation of the construction equipment. Implementation of **MM AQ-1: Emission Reduction Measures** would require zero-emission and near-zero emission construction equipment (i.e., electric or hydrogen-powered heavy equipment) which operates much quieter than traditional diesel-powered equipment (estimated at 10 dB reduction compared to diesel versions), which would reduce noise levels associated with construction activities up to 25 dB at nearby sensitive receptors. In addition, for Plan projects within 200 feet of a sensitive receptor or where the estimated construction noise levels identified in Table 3.13-10 propagated to the nearest receptor (i.e., assuming an attenuation rate of 6 dB per double of distance) would exceed the noise ordinance of the respective jurisdiction, implementation of **MM NOI-1: Prepare Construction Noise/Vibration Work and Mitigation Monitoring Plan**. Therefore, construction impacts would remain significant and unavoidable. For the operations of Projects, the implementation of **MM NOI-2: Prepare Focused Noise Study and Noise Reduction Measures** would require a focused noise study be conducted for future projects, and where impacts are identified, provide measures or engineering BMPs to reduce exterior noise below the limit. However, despite those measures, operational impacts may still cause a temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. In some circumstances, noise-attenuating features (e.g., soundwalls and acoustical shielding) applied to reduce noise levels to below the applicable threshold may be infeasible or inapplicable. Therefore, operational noise impacts would remain significant and unavoidable.

8.7.1.1 Findings

Although mitigation measures have been required in, or incorporated into, the proposed Project that would avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, depending on future project location, impacts would be potentially significant and unavoidable.

8.7.1.2 Mitigation Measure(s)

MM AQ-1: Emission Reduction Measures, described above.

MM NOI-1: Prepare Construction Noise/Vibration Work and Mitigation Monitoring Plan, described above.

MM NOI-2: Prepare Focused Noise Study and Noise Reduction Measures, described above.

8.7.2 Impact – Noise (b) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction)

Impacts related to vibration are potentially significant. For projects within 200 feet of a sensitive receptor, implementation of **MM NOI-1: Prepare Construction Noise/Vibration Work and Mitigation Monitoring Plan** would require a project-specific noise and vibration study and implementation of noise reduction strategies to reduce noise and vibration levels, including measures such as using less vibration-intensive construction equipment, timing construction so structures would not be occupied when high levels of vibration are expected, and/or informing residents of the timing of construction and

that vibration may be noticeable during these times. Despite those measures, construction vibration impacts may still exceed the significance threshold for construction vibration in certain circumstances where sensitive receptors are near vibration-inducing construction activities. Therefore, where vibration reduction measures are either not feasible or would not reduce vibration to below the applicable threshold, construction vibration impacts would remain significant and unavoidable.

8.7.2.1 Findings

Although mitigation measures have been required in, or incorporated into, the proposed Project that would avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, depending on future project locations, impacts would be potentially remain significant and unavoidable.

8.7.2.2 Mitigation Measure(s)

MM NOI-1: Prepare Construction Noise/Vibration Work and Mitigation Monitoring Plan

8.8 Recreation

8.8.1 Impact – Recreation (b) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction and Operations)

Construction of Plan components would result in temporary, localized impacts to the physical environment, including from construction-related emissions and noise. Impacts from construction or expansion of recreational facilities may be potentially significant and unavoidable or have mitigation measures assigned that reduce impacts to less than significant, as discussed in each of these resource analyses in the PEIR. The majority of potentially significant construction impacts for individual projects implemented under the Plan would be mitigated to less than significant; however, depending on the location of an individual project in relation to the presence of sensitive receptors, there remains the potential that for some projects implemented under the Plan, construction impacts to the physical environment would be significant and unavoidable. Operation of projects under the Plan would require regular maintenance as described for each Plan component in Section 2.3. Maintenance activities may result in an adverse physical effect on the environment through noise and air emissions of maintenance equipment and use of chemicals to control weeds and pests. The effects are described in detail within the respective chapters for each resource and could be potentially significant, depending on the size and location of an individual project developed under the Plan relative to the location of nearby sensitive receptors. Therefore, operational impacts would be significant and unavoidable.

8.8.1.1 Findings

Although mitigation measures have been required in, or incorporated into, the proposed Project that would avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, depending on future project locations, impacts would be potentially remain significant and unavoidable.

8.8.1.2 Mitigation Measure(s)

All MMs under Aesthetics, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hydrology and Water Quality, Mineral Resources, and Noise.

8.9 Transportation

8.9.1 Impact – Transportation (a) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction)

Depending on location, future projects implemented under the Plan could conflict with a local program, plan, ordinance or policy addressing the circulation system. Implementation of **MM TR-1: Construction Transportation Management Plan** requires the preparation and implementation of a project-specific Construction Transportation Management Plan once a project has been proposed at a specific location that will identify the location and timing of temporary closures and detours with the goal of maintaining traffic flow, especially during peak periods as well as minimize impacts to pedestrians and bicyclists when bike lanes or sidewalks must be closed. Implementation of **MM TR-2: Restrict Lane Closures and Maintain Access** would further minimize impacts to circulation by limiting lane closures to off-peak periods to reduce traffic delays as well as requiring access to schools, residential areas, and business be maintained. To avoid conflicts between construction activities and pedestrians and bicyclists, **MM TR-3: Closure Notification and Detours** would require advanced notice and detours and/or safe areas along the construction zone when construction results in temporary closures of sidewalks, other pedestrian facilities, and bike paths/routes. In addition, implementation of **MM TR-4: Notify Emergency Personnel of Road Closures** would reduce impacts to emergency services by providing advanced notification of proposed lane closures to emergency personnel. However, project specific circumstances from construction of greenway paths and amenities could still result in unforeseen circumstances such as temporary closures being unable to maintain traffic flow during peak period resulting in a significant impact. Temporary closures may also result in increased congestion necessitating alternative routes, and potentially forcing existing traffic to take longer trips along local roadways. With implementation of the above mitigation measures, the magnitude of transportation and circulation impacts are expected to be reduced, but these measures cannot guarantee avoidance of all significant impacts for every project. Therefore, project components may result in a conflict with programs, plans, or policies addressing the circulation system, or transit, roadway, bicycle, or pedestrian facilities, through the possible increase in congestion and VMT from temporary facilities closures.

8.9.1.1 Findings

Although mitigation measures have been required in, or incorporated into, the proposed Project that would avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, depending on future project locations, impacts would be potentially significant and unavoidable.

8.9.1.2 Mitigation Measure(s)

MM TR-1: Construction Transportation Management Plan. The project proponent shall prepare and implement a Construction Transportation Management Plan that will include provisions for the following:

- Implementation of standard safety practices, including installation of appropriate barriers between work zones and transportation facilities, placement of appropriate signage, and use of traffic control devices.
- Use of flaggers and/or signage to guide vehicles through or around construction zones using proper techniques for constructing activities including staging area entrance and exit.
- Alternate traffic routes and the use of construction personnel carpools or shuttles to avoid roads that are operating at a Level of Service D or lower.
- Traffic detours for any road or land closures with appropriate signage marking the detours.
- Timing of lane and road closures.
- Plans for construction worker parking and transportation to work sites.
- Methods for keeping roadways clean.
- Storage of all equipment and materials in designated work areas in a manner that minimizes traffic obstructions and maximizes sign visibility.
- Routing of trucks to avoid minor roads, where possible to reduce congestion and potential asphalt damage.
- Repair asphalt and other road damage (e.g., curb and gutter damage, rutting in unpaved roads) caused by construction vehicles.
- Detours for cyclists and pedestrians when bike lanes or sidewalks must be closed.
- Maintain emergency ingress and egress to access roads at all times.

MM TR-2: Restrict Lane Closures and Maintain Access. The project proponent shall restrict all necessary lane closures or obstructions associated with construction activities to off-peak periods to reduce traffic delays. Project work within or abutting a Caltrans right of way shall not occur unless authorized by an encroachment permit. Lane closures shall not occur between 6:00 and 9:30 a.m. and between 3:30 and 6:30 p.m., unless otherwise authorized by the responsible public agency with jurisdiction over the affected street or highway through the issuance of an encroachment permit.

MM TR-3: Closure Notification and Detours. Where construction results in temporary closures of sidewalks and other pedestrian facilities, the project proponent shall provide temporary pedestrian access, through detours or safe areas along the construction zone. Where construction activity results in bike route or bike path closures, appropriate detours shall be defined. Signs shall be placed along the closed bike path a minimum of seven days prior to bike path closure notifying bicyclists of the proposed construction activities and duration of bike path closure. Notifications posted along the bike path shall include the location of detours and alternate routes to avoid conflicts with the construction area.

MM TR-4: Notify Emergency Personnel of Road Closures. The project proponent shall notify local emergency personnel (i.e., fire departments, police departments, ambulance, and paramedic services) at least seven days prior to lane or road closures. The notice shall include location(s), date(s), time(s), and duration of closure(s), and a contact number for project personnel.

8.9.2 Impact – Transportation (b) Greenway Paths + Pocket Parks and Greenspaces (Operations)

For projects implemented under the Plan that include any components other than the largest greenspace considered (25-acres), impacts would be less than significant. However, if a project developed under the Plan included that largest size park considered (25-acre parks and greenspaces) which could include sports fields and playgrounds, it would potentially generate substantially more net daily trips resulting in potentially significant and unavoidable VMT impacts. Implementation of **MM TR-5: Determine VMT Based on Type of Subsequent Project** would require that a project-specific VMT analysis be performed using the County's VMT impact criteria that have been developed based on guidance from OPR and CARB. If a proposed project cannot be screened out and the VMT is determined to exceed the applicable thresholds based on the applicable guideline and project type, then implementation of **MM TR-6: Implement Transportation Demand Management Strategies and/or Enhancements to Reduce VMT** would be required. **MM-TR-6: Implement Transportation Demand Management Strategies and/or Enhancements to Reduce VMT** would require implementation of transportation demand management strategies such as increasing transit accessibility, relocating a project in order to be adjacent to transit, and/or pricing any provided parking to discourage vehicle trips. However, depending on the project location and number of vehicle trips generated as a result of operations, in some circumstances, transportation demand management strategies applied to reduce transportation impacts may not reduce impacts below the applicable threshold or may be infeasible. Therefore, operation of projects implemented under the Plan could have a potentially significant and unavoidable transportation impact.

8.9.2.1 Findings

Although mitigation measures have been required in, or incorporated into, the proposed Project that would avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, depending on future project locations, impacts would be potentially significant and unavoidable.

8.9.2.2 Mitigation Measure(s)

MM TR-5: Determine VMT Based on Type of Subsequent Project, as described above.

MM TR-6: Implement Transportation Demand Management Strategies and/or Enhancements to Reduce VMT, as described above.

8.9.3 Impact – Transportation (c) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction)

Depending on the location of a Project within the Plan Area, construction activities could substantially increase hazards due to a geometric design feature or incompatible uses, such that impacts could be potentially significant and unavoidable. The project-specific construction transportation management plan shall provide a traffic control plan that would minimize hazards associated with construction activities. However, depending on the project location, in some circumstances, the measures outlined in

MM TR-1: Construction Transportation Management Plan applied to reduce transportation impacts during construction may not reduce impacts below the applicable threshold or may be infeasible. Therefore, construction activities may result in a potentially significant and unavoidable impact related to hazards due to a geometric design feature or incompatible uses.

8.9.3.1 Findings

Although mitigation measures have been required in, or incorporated into, the proposed Project that would avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, depending on future project locations, impacts would be potentially significant and unavoidable.

8.9.3.2 Mitigation Measure(s)

MM TR-1: Construction Transportation Management Plan, as described above.

8.9.4 Impact – Transportation (d) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction)

Depending on the location of Project implemented within the Plan Area construction activities could result in inadequate emergency access due to temporary road closures. Implementation of **MM TR-1: Construction Transportation Management Plan**, would require project proponents to develop a construction transportation management plan to identify appropriate lane closures/routing and detours. This information would also be provided to local emergency providers to ensure adequate access and travel for emergency vehicles is maintained. However, depending on the project location and construction activities and/or feasibility of mitigation measures, in some circumstances, emergency access may be impeded. Therefore, impacts related emergency access during the construction phase of future projects implemented under the Plan could be potentially significant and unavoidable.

8.9.4.1 Findings

Although mitigation measures have been required in, or incorporated into, the proposed Project that would avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, depending on future project locations, impacts would be potentially significant and unavoidable.

8.9.4.2 Mitigation Measure(s)

MM TR-1: Construction Transportation Management Plan, as described above.

8.10 Tribal Cultural Resources

8.10.1 Impact – Tribal Cultural Resources (a) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction and Operations)

Construction and operation of Project implemented under the Plan could cause a substantial adverse change in the significance of a tribal cultural resource (TCR), which would be a significant and unavoidable impact. If no TCRs are identified through consultation, then nothing further would be required. If, however, a TCR is identified by the lead agency in the Plan Area through the consultation process, and if construction could result in a substantial adverse change in the significance of the TCR, then the impact would be considered significant. The effects and individual circumstances of a potential project's impacts on TCRs cannot be known at this time, as individual site reconnaissance and consultation has not been completed. While **MM TCR-1: Tribal Cultural Resources Assessment, MM TCR-2: Avoid Cultural and Tribal Cultural Resources, Prepare Treatment Plan, MM TCR-4: Conduct Native American Monitoring, and MM TCR-3: Unanticipated Discovery** would reduce impacts to TCRs, impacts at the project or program level could still be significant. Accordingly, the potential for construction activity to cause a substantial adverse change in the significance of archaeological resources in the Plan Area would be significant and unavoidable. An increase in users to recreational resources near TCRs could indirectly and directly degrade resources through increased erosion, unanticipated destruction of in situ resources, and destruction or removal by facility users. While no further ground disturbance would occur following the completion of construction activities, and consideration of any present TCRs would have been addressed as part of the project design and construction process unanticipated impacts by recreational users within the plan area could be significant. Therefore, impacts from construction and operations to TCRs would be significant and unavoidable.

8.10.1.1 Findings

Although mitigation measures have been required in, or incorporated into, the proposed Project that would avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, depending on future project locations, impacts would be potentially significant and unavoidable.

8.10.1.2 Mitigation Measure(s)

MM TCR-1: Tribal Cultural Resources Assessment, as described above.

MM TCR-2: Avoid Cultural and Tribal Cultural Resources, Prepare Treatment Plan, as described above.

MM TCR-3: Unanticipated Discovery, as described above.

MM TCR-4: Conduct Native American Monitoring, as described above.

8.11 Wildfire

8.11.1 Impact – Wildfire (a) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction)

Due to the programmatic nature of Plan, the location and design of future projects cannot be determined at this time. However, it can reasonably be assumed that staging areas and construction zones for greenway paths, greenway amenities, pocket parks and greenspaces, safe crossings, and stormwater management facilities could occur on the District ROW and adjacent parcels where they fall within or near State Responsibility Areas (SRAs) or lands classified as VHFSZ. Implementation of **MM WF-1: Construction Coordination with Emergency and Fire Services** would require that the relevant emergency response services are consulted prior to construction and are able to identify necessary measures to prevent the impairment of emergency response, thereby reducing the potential impacts during construction. However, the possibility remains that consulting emergency service agencies would not result in measures capable of reducing impacts to less than significant when projects are sited in or near SRAs or lands classified as VHFSZ. Therefore, impacts from construction would remain potentially significant and unavoidable within these areas.

8.11.1.1 Findings

Although mitigation measures have been required in, or incorporated into, the proposed Project that would avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, depending on future project locations, impacts would be potentially significant and unavoidable.

8.11.1.2 Mitigation Measure(s)

MM WF-1: Construction Coordination with Emergency and Fire Services, as described above.

8.11.2 Impact – Wildfire (b) Greenway Paths + Greenway Amenities, Greenway Paths + Pocket Parks and Greenspaces, Greenway Paths + Safe Crossings, and Greenway Paths + Stormwater Management (Construction and Operations)

Due to the programmatic nature of Plan, the location and design of future projects cannot be determined at this time. However, it can reasonably be assumed that staging areas and construction zones for greenway paths, greenway amenities, pocket parks and greenspaces, safe crossings, and stormwater management facilities could occur on the District ROW and adjacent parcels where they fall within or near SRAs or lands classified as VHFSZ. Construction activities, when at sites within a VHFSZ or in or near an SRA, would involve equipment that may exacerbate wildfire risk in these areas. Heat or sparks from construction equipment or vehicles or from the use of flammable materials have the potential to ignite nearby vegetation and start a fire. While existing regulations would address potential fire risks associated with construction, when these activities occur within a VHFHZ, the existing regulations may not adequately address the heightened risks. Further precautions may need to be taken, including **MM WF-2: Prepare a Construction Fire Protection Plan**. Future project sites could feature conditions that would present additional wildfire risk and construction in these areas could

result in potentially significant impacts related to exacerbating wildfire risks of, and exposing project occupants to, direct or indirect risk of injury, loss, or death due to wildfire. Therefore, construction impacts would be potentially significant and unavoidable in these areas. Once operational, greenway paths and other Plan components would be expected result in increased numbers of daily users to project sites (e.g., increased vehicle, bike, and pedestrian traffic). If a newly constructed project is within or adjacent to a VHFSZ, it could expose visitors to hazardous conditions associated with the high risk of wildfire at the site who were not previously exposed to this risk. Therefore, operational impacts would be potentially significant and unavoidable.

8.11.2.1 Findings

Although mitigation measures have been required in, or incorporated into, the proposed Project that would avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, depending on future project locations, impacts would be potentially significant and unavoidable.

8.11.2.2 Mitigation Measure(s)

MM WF-2: Prepare a Construction Fire Protection Plan, as described above.

8.11.3 Impact – Wildfire (c) Greenway Paths and Greenway Amenities + Pocket Parks and Greenspaces + Safe Crossings + Stormwater Management (Construction and Operations)

Greenway paths and other Plan components may require extension of or new utilities, such as water, electric, and sewer infrastructure such as mains, distribution pipes, as well as relocation of existing utilities on sites that are within or adjacent to VHFHSZ areas since the location and design of future projects are currently unknown. While major utility upgrades would not be anticipated, if any upgrades are made within VHFHSZs, these extensions (especially electrical), could exacerbate wildfire risk due to the high fire ignition potential of electricity and the highly flammable nature of materials used during construction. The locations of future Plan projects are unknown and there remains potential that operation and maintenance of fire breaks, utilities (especially electric), or other infrastructure could result in a potentially significant impact.

8.11.3.1 Findings

Although mitigation measures have been required in, or incorporated into, the proposed Project that would avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, depending on future project locations, impacts would be potentially significant and unavoidable.

8.11.3.2 Mitigation Measures

MM WF-2: Prepare a Construction Fire Protection Plan, as described above.

MM WF-3: Operations Fire Prevention Measures, as described above.

8.11.4 Impact – Wildfire (d) Greenway Paths +Greenway Amenities, Greenway Paths +Pocket Parks and Greenspaces, greenway Paths +Safe Crossings, Greenway Paths + Stormwater Management (Construction and Operations)

Because locations of specific project sites are not known at this time, construction of projects located in VHFHSZs or that have recently involved wildfires combined with areas prone to landslides or slope instability could expose workers, structures, and property to significant risks related to post-fire conditions. Impacts would be potentially significant. The operation of Plan components would likely introduce an increased number of daily visitors to project sites and expose those people as well as staff and structures to an area highly susceptible to landslides or slope instabilities after a wildfire event.

8.11.4.1 Mitigation Measures

MM WF-2: Construction Fire Prevention Plan, as described above.

8.11.4.2 Findings

Although mitigation measures have been required in, or incorporated into, the proposed Project that would avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, depending on future project locations, impacts would be potentially significant and unavoidable.

SECTION 9 Findings on Cumulative Impacts

9.1 Impacts that Are Not Cumulatively Considerable (Without Mitigation)

The Draft PEIR identifies certain resource areas that would result in no cumulative impact for both project construction and operations because the context for a cumulative condition for that resource was determined in the PEIR to not occur or the contribution of the Plan would not be considerable. These include the following:

- Aesthetics
- Agriculture and Forestry Resources
- Energy
- Geology and Soils
- Greenhouse Gases
- Hydrology and Water Quality
- Population and Housing
- Transportation

Each is described in detail below.

9.1.1 Aesthetics

The SGV is largely built out of single- and multi-family residential homes, as well as commercial and industrial land uses. Few remaining vacant and open spaces remain in the SGV that are not already designated as open spaces/recreational land uses. While population projects from the LA County 2035 General Plan and SCAG 2020-2045 RTP/SCS indicate an anticipated population decline over the next few decades, growth and development in the SGV is anticipated to continue as the few remaining vacant parcels are developed and underutilized parcels are redeveloped in accordance with the land use plans of the various incorporated cities within the Plan Area. This continued urbanization of the SGV will result in changes that could potentially affect visual resources and visual character of the valley.

Cities in the SGV, as well as the County of Los Angeles, have development and design standards that projects must comply with to avoid or mitigate adverse visual impacts. Development and design review of individual projects by individual cities or the County would prevent the potential for adverse visual impacts for many projects implemented under the Plan, including potential increases in light and glare. However, as discussed in Section 3.1, Aesthetics, depending on where the project is located and who is implementing the project, the potential exists for a project to conflict with applicable zoning and regulations regarding scenic quality, which could result in significant and unavoidable impacts. Similar impacts were not identified in the environmental analyses for the Emerald Necklace Implementation Plan or the current Bicycle Master Plan (these plans were determined consistent with regulations regarding scenic quality). Therefore, while impacts under the Plan may be significant and unavoidable in this regard, when considered with other plans in the region, this is not considered a cumulatively considerable impact.

Overall implementation of the Plan is anticipated to develop a cohesive aesthetic for the overall Greenway Network. Further, projects implemented under the Plan, in addition to those implemented under the Emerald Necklace Implementation Plan and Bicycle Master Plan, would cumulatively result in an overall increase in open spaces in the SGV, contributing to beneficial impacts to aesthetics in the region. Taken together with the regional conditions and projections for aesthetics, the impacts of the Plan would not be cumulatively considerable.

9.1.1.1 Findings

There is no cumulative condition with respect to aesthetics; therefore, the proposed Project would not make a cumulatively considerable contribution to aesthetics impacts.

9.1.2 Agriculture and Forestry Resources

Individual projects implemented under the Plan could result in potentially significant impacts to agriculture and forestry resources depending on location, and who is conducting the project. Overall, the Plan Area includes very little land designated for agricultural purposes. Similarly, implementation of the Emerald Necklace Implementation Plan and Bicycle Master Plan are focused on expansion of the active transportation network along existing flood control channels, and do not propose the conversion of agricultural resources. Therefore, while individual projects under the Plan could result in significant and unavoidable impacts to agricultural resources, overall implementation of the Plan would not have a considerable contribution to potential cumulative impacts for agricultural resources.

9.1.2.1 Findings

There is no cumulative condition with respect to agriculture and forestry resources; therefore, the proposed Project would not make a cumulatively considerable contribution to agriculture and forestry resource impacts.

9.1.3 Air Quality

The greatest cumulative impact on the quality of regional air quality would be the incremental addition of pollutants through increased traffic from residential, commercial, and industrial developments over time. However, the most recently completed forecasts for LA County and the SGV indicate population decline, while the Southern California Association of Governments forecast suggests potential growth but at a much slower rate than previous forecasts. The Plan once implemented, and when considered in combination with the anticipated implementation of projects under the Emerald Necklace Implementation Plan and Bicycle Master Plan, would provide a means of alternative transportation potentially resulting in overall fewer vehicle trips throughout the SGV and a beneficial impact.

Air quality would be temporarily degraded during construction activities that occur separately or simultaneously. The Los Angeles County portion of the South Coast Air Basin (SCAB) is designated by the USEPA as a nonattainment area for ozone, lead, and $PM_{2.5}$. The SCAB is designated by CARB as a state-level nonattainment area for ozone, $PM_{2.5}$, and PM_{10}. However, the SCAQMD provides project-level thresholds of significance for criteria pollutants for which the SCAB is in nonattainment. These are the levels at which, if exceeded, the SCAQMD has determined that an individual project's contribution to the

cumulative impact (nonattainment) is cumulatively considerable. Emissions from future projects implemented under the Plan are expected to be below the SCAQMD thresholds for construction activities and operational activities. Therefore, implementation of the Plan would not result in a considerable contribution to the significant cumulative impact for air quality.

9.1.3.1 Findings

While there is an existing cumulative condition with respect to air quality in the SCAB, the proposed Project would not make a cumulatively considerable contribution to air quality impacts.

9.1.4 Energy

Implementation of individual projects under the Plan would require energy use during construction activity, and long-term maintenance of facilities. However, projects would be implemented according to the *Design Guidelines and Standards*, which specify numerous measures to ensure energy and water conservation and efficiency, including installation of solar-powered lights. Overall, implementation of the Plan would increase the active transportation network and open space areas in the region, which would reduce vehicle miles traveled. Further, the Plan would not result in any population growth and the need for new housing or facilities which would increase current demand for energy. When considered together with the Emerald Necklace Implementation Plan and the Bicycle Master Plan as well as current forecasts for future population levels in the region, cumulative impacts with regard to energy are not anticipated. Therefore, effects to energy would not be cumulatively considerable.

9.1.4.1 Findings

There is no cumulative condition with respect to energy; therefore, the proposed Project would not make a cumulatively considerable contribution to energy impacts.

9.1.5 Geology and Soils

Geology and soil impacts are considered site-specific, such that development of a project in one site would not alter the potential for geologic events or soil types at another project site. Seismic events are regional and affect large areas at one time. Strong ground-shaking events could lead to damage of structures constructed under the Plan, as well as buildings and structures in the surrounding areas. However, implementation of the Plan would not increase these impacts, and the Plan does not propose any structures for human occupancy that would increase risks of injury as a result of strong ground shaking.

Site-specific geologic and soil hazards such as liquefaction, landslides, erosion and expansive soils would be addressed at each individual project site through implementation of the mitigation measures described in Section 3.7, Geology and Soils. As geologic and soil hazards are site-specific, they would similarly be addressed for individual Emerald Necklace Implementation Plan and the Bicycle Master Plan projects as they're implemented. As such, that development of a project in one site would not alter the

potential for geologic events or soil types at another project and seismic events are already considered regional; therefore, compliance with mitigation measures would assure that impacts would not be cumulatively significant, and that the Plan would not contribute to any cumulatively adverse effects related to geology and soils, including the risk of loss, injury, or death to people or structures due to geologic or soil hazards.

9.1.5.1 Findings

There is no cumulative condition with respect to geology and soils; therefore, the proposed Project would not make a cumulatively considerable contribution to geology and soils impacts.

9.1.6 Greenhouse Gases

GHG emissions resulting from implementation of the Plan would be related to construction and mobile sources (visitor traffic). Although construction activities would be temporary in nature, traffic related to the Plan would continue through operation of the trails system. With continued growth in the region, the number of vehicle trips would also likely increase with population growth, although as described above growth in the region is expected to be slow or even decrease over the next few decades. In addition, federal regulations require that car manufacturers reduce GHG emissions from vehicles, and the SCAG RTP/SCS includes plans for numerous public transportation system improvements that would further reduce vehicle traffic in the region. Nonetheless, given the area is already impacted by motor vehicle traffic, any increase in total number of vehicles on the road, including those during construction activity, within the Plan Area is anticipated to result in a significant cumulative impact associated with GHG emissions.

As described in Section 3.8, Greenhouse Gas Emissions, Los Angeles County adopted the 2045 CAP which took effect in June 2024, which is an update to the 2020 CAP and sets new GHG emissions reduction targets for 2030 and 2035, consistent with state goals, and sets a long-term aspirational goal for carbon neutrality by 2045 (Los Angeles County Department of Regional Planning 2024). The 2045 CAP includes five categories for GHG emissions reductions: (1) energy supply, (2) transportation, (3) building energy and water, (4) waste, and (5) agriculture, forestry, and other land uses. Under these categories, there are various strategies, measures, and actions which will achieve the GHG emissions reductions outlined in the 2045 CAP such as decarbonizing the energy supply, increase densities and diversity of land uses near transit, reducing single occupancy vehicle trips, improve efficiency of existing building energy use, conserving water, and others. Projects completed by the County or Flood Control District in unincorporated areas of the County would be consistent with the CAP; however, projects implemented under the Plan by other entities in incorporated cities may not be consistent with the Plan, which could result in cumulatively considerable contribution of cumulative impacts associated with GHG.

Implementation of the Plan when considered in combination with the Emerald Necklace Implementation Plan would help meet the goals of the Bicycle Master Plan. Fewer vehicle trips and vehicle miles traveled as a result of all three plans would translate into fewer mobile source emissions. As such, the Plan could result in beneficial impacts related to GHG emissions by providing trails and access to bicyclists, pedestrians, and equestrians as an alternative means of transportation in the SGV.

9.1.6.1 Findings

There is no cumulative condition with respect to greenhouse gases; therefore, the proposed Project would not make a cumulatively considerable contribution to greenhouse gas impacts.

9.1.7 Hydrology and Water Quality

Hydrology and water quality impacts associated with Plan implementation are related to earthmoving during construction activity. While earthmoving activities would increase the potential for erosion and sedimentation, projects implemented under the Plan would be required to comply with stormwater management features as specified in the *Design Guidelines and Standards,* and overall implementation of the Plan is anticipated to result in an increase in greenspace and decrease in imperious surface coverage which would result in a beneficial impact. The implementation of this Plan in combination with the Emerald Necklace Implementation Plan and Bicycle Master Plan would further result in a cumulative increase in greenspace and improved stormwater management in the SGV. Therefore, the construction and operation of projects under the Plan are not anticipated to contribute to cumulatively considerable adverse impacts related to hydrology and water quality.

9.1.7.1 Findings

There is no cumulative condition with respect to hydrology and water quality; therefore, the proposed Project would not make a cumulatively considerable contribution to hydrology and water quality impacts.

9.1.8 Population and Housing

Based on the projections described in Section 4. 1.2, SGV Growth Projections, the population of the SGV is anticipated to decline over the coming years. Implementation of the Plan would extend pedestrian and cycling pathways through the SGV, and when considered in combination with projects implemented under the Emerald Necklace Implementation Plan and Bicycle Master Plan, could result in a comprehensive greenway network throughout the SGV. However, none of these plans would extend additional infrastructure (i.e., water, sewer, electricity beyond that needed for potential restrooms), which would indirectly induce unplanned population growth, and the Plan does not include construction or operation of any new residential or commercial structures. Therefore, there would be no cumulatively considerable adverse impacts related to population and housing.

9.1.8.1 Findings

There is no cumulative condition with respect to population and housing; therefore, the proposed Project would not make a cumulatively considerable contribution to population and housing impacts.

9.1.9 Transportation

A primary goal of the Plan is to improve mobility and recreational opportunities for people with disabilities, youth and aging populations, bicyclists, pedestrians, and equestrians in the SGV. As such, the transportation impacts of the Plan will primarily result from vehicle trips during construction activity, and vehicle trips for recreational users to access the constructed greenway. Depending on the location

of individual projects, impacts on transportation could be significant as a result of road closures or detours during construction. However, overall implementation of the Plan, when considered in conjunction with the Bicycle Master Plan and Emerald Necklace Implementation Plan, is anticipated to cumulatively reduce vehicle miles traveled in the region through the development of a comprehensive active transportation network. Therefore, the Plan would contribute to, but not considerably, cumulative impacts to transportation and traffic.

9.1.9.1 Findings

There is no cumulative condition with respect to transportation; therefore, the proposed Project would not make a cumulatively considerable contribution to transportation impacts.

9.2 Impacts that Are Not Cumulatively Considerable (With Mitigation)

For the following resource categories mitigation measures are included which would be required to ensure the Project contribution to cumulative impacts is not considerable:

- Biological Resources
- Cultural Resources
- Hazards and Hazardous Materials
- Mineral Resources
- Noise
- Public Services
- Recreation
- Tribal Cultural Resources
- Utilities
- Wildfire

Each is described in detail below.

9.2.1 Biological Resources (Construction and Operation)

Development associated with implementation of the Plan would be focused along the San Gabriel River and associated creeks in the Plan Area, most of which have undergone significant transformation from their natural state and are managed with levees and dams. All projects would occur on or adjacent to existing flood control and transportation infrastructure along the existing District ROW. Construction activities and operational maintenance of individual projects implemented under the Plan have the potential for significant impacts to Biological Resources, but implementation of mitigation measures (**MM BIO-1** through **MM BIO-13**) would avoid and/or minimize the short-term adverse effects of individual construction projects, such that all impacts would be less than significant). With the implementation of mitigation, impacts to wildlife and habitat would be avoided and/or minimized during construction activity of individual projects (e.g., wildlife would likely move to other areas nearby during construction activity as any wildlife present are already adapted to urban conditions). Further, construction of individual projects would occur intermittently in various areas throughout the SGV over time. Similarly, a wide range of mitigation measures that must be implemented by individual projects in order to reduce impacts to special status species and sensitive natural habitat are required for projects implemented under the Emerald Necklace Implementation Plan and the Bicycle Master Plan (e.g.,

nesting bird surveys, pre-construction biological clearance surveys), and cumulatively considerable impacts from the construction and maintenance of greenways and paths developed in accordance with all plans in the SGV are not anticipated. As such, the Plan is not anticipated to considerably contribute to cumulative adverse impacts to biological resources in the SGV region. Further, the combined implementation of the Plan, along with the Emerald Necklace Implementation Plan and Bicycle Master Plan, is expected to enhance natural habitats and improve wildlife habitat in the region, which would contribute to long-term beneficial impacts to biological resources in the SGV region.

9.2.1.1 Findings

With the implementation of mitigation measures, the Plan's contribution to potential cumulative impacts to biological resources would be less than significant.

9.2.2 Cultural Resources (Construction and Operation)

The Plan Area is considered sensitive with a high potential for cultural resources (both archaeological resources and historic resources) in the region. Depending on the location of individual projects, the potential exists that adverse impacts to cultural resources could occur. With implementation of mitigation measures which require avoiding sites with known cultural resources or historic resources (**MM CR-2: Avoid Historic Resources** and **MM CR-5: Avoid Cultural Resources, Prepare Treatment Plan**) or preparing appropriate treatment plans (**MM CR-3: Prepare and Implement Historic Resources Mitigation Plan** and **MM-CR-6: Monitoring**), impacts would be reduced to less than significant levels, which would also reduce the potential for cumulative impacts of overall Plan development. Similar mitigation measures are required for the Emerald Necklace Implementation Plan, and it is anticipated that similar mitigation measures would be implemented for projects developed under the Bicycle Master Plan that could affect cultural resources. Therefore, effects to cultural resources are not anticipated to be cumulatively considerable.

9.2.2.1 Findings

With the implementation of mitigation measures, the Plan's contribution to potential cumulative impacts to cultural resources would be less than significant.

9.2.3 Hazards and Hazardous Materials (Construction and Operation)

Hazards and hazardous materials impacts related to the Plan are related to construction of individual projects and subsequent operational maintenance activities. These impacts could include exposure of construction workers and the public to hazardous materials that could be encountered or used during construction and maintenance activities. However, as construction will be temporary and maintenance will be conducted intermittently, implementation of the mitigation measures, as described in Section 3.9, Hazardous and Hazardous Materials (**MM HAZ-1: Pre-construction Hazardous Sites Records Search, MM HAZ-2: Phase I/II Environmental Site Assessment and MM HAZ-3: Soil and Groundwater Management Plan**), would reduce impacts to less than significant levels. Any other developments in the region, including projects developed for the Emerald Necklace Implementation Plan and the Bicycle Master Plan would be required to comply with similar mitigation measures and similar applicable

regulations. Therefore, it is not anticipated that cumulatively considerable impacts related to use, transport or disposal of hazardous materials would occur. Further risk of upset from release of hazardous materials would not be cumulatively considerable. Accordingly, the Plan would not have a considerable contribution to cumulative impacts. (Discussion of cumulative impacts related to exposure to risks related to wildland fires is discussed in Section 4.2.20, Wildfire, below).

9.2.3.1 Findings

With the implementation of mitigation measures, the Plan's contribution to potential cumulative impacts related to hazards and hazardous materials would be less than significant.

9.2.4 Mineral Resources (Construction and Operation)

Future projects implemented under the Plan could result in potentially significant impacts if located in a designated mineral resource area, but with implementation of **MM MR-1: Ensure Access to Mineral Resources,** implementation of the Plan would not preclude access to any known minerals. Similarly, implementation of the Emerald Necklace Implementation Plan has been determined to not preclude access to any known minerals and the Bicycle Master Plan would develop the District ROW, which would not preclude access to known minerals. Mineral extraction is in specifically designated areas. Future growth of the region, based on projections described in Section 4.1.2, SGV Growth Projections (e.g., growth induced by private development such as new residential units or commercial areas), if any, would have to comply with local plans and zoning designations regarding mineral resources. Therefore, cumulatively considerable impacts to mineral resources would not occur.

9.2.4.1 Findings

With the implementation of mitigation measures, the Plan's contribution to potential cumulative impacts to mineral resources would be less than significant.

9.2.5 Noise (Construction and Operation)

Implementation of the Plan could result in significant and unavoidable impacts in ambient noise levels, both during construction and long-term operation depending on the location of individual projects relative to sensitive receptors. The plan would require the implementation of **MM AQ-1: Emission Reduction Measures**, **MM NOI-1: Prepare Construction Noise/Vibration Work and Mitigation Monitoring Plan**, and **MM NOI-2: Prepare Focused Noise Study and Noise Reduction Measures**. However, these mitigation measures may not mitigate all ambient noise impacts to sensitive receptors or local established noise standards in all locations for all projects that could be completed under the Plan, resulting in significant and unavoidable impacts. While the Plan could result in increases in noise in specific locations where projects are implemented, because the Plan Area covers such a large geographic region and projects would be implemented intermittently in the future, implementation of the Plan would not result in an increase in the overall noise setting of the region. Therefore, the Plan would contribute, but not considerably, to cumulative noise impacts in the region. Further, overall implementation of the Plan, when considered with implementation of the Emerald Necklace Implementation Plan and Bicycle Master Plan, as well as forecasted decline in population, could result in

fewer vehicle miles traveled in the region (as all such projects are intended to provide opportunities for alternative modes of transportation throughout the region). Any decrease in motor vehicles on local roadways and highways would result in an associated decrease in noise from motor vehicles, which would be a beneficial impact.

9.2.5.1 Findings

With the implementation of mitigation measures, the Plan's contribution to potential cumulative impacts with regard to noise would be less than significant.

9.2.6 Public Services (Construction and Operation)

The implementation of the Plan would result in less than significant impacts with mitigation to public services as related to construction with implementation of **MM TR-4: Notify Emergency Personnel of Road Closures** and **MM REC-1: Coordinate with Park Departments/Agencies** and less than significant impacts during operations. The Plan would facilitate the construction of new recreational facilities and active transportation infrastructure. Recreational users that would use the network are anticipated to come from the existing regional population, which are already served by local and regional fire and police departments, schools and parks. Implementation of the Plan would not have any impact on population growth in the region, and as previously discussed, current forecasts anticipate population decline over the next few decades. Although there are no public facilities located on District ROW, the Plan does not propose to demolish, relocate, or retire any existing public facilities that may be located on adjacent parcels, and with proper notification per **MM TR-4: Notify Emergency Personnel of Road Closures** and **MM REC-1: Coordinate with Park Departments/Agencies**, potentially significant impacts related to response times (for police and fire protection) or temporary closures (for parks), projects would be less than significant with mitigation. These project impacts are not exacerbated when considered with implementation of the Emerald Necklace Implementation Plan and Bicycle Master Plan. Therefore, cumulatively considerable impacts to public services would not occur.

9.2.6.1 Findings

With the implementation of mitigation measures, the Plan's contribution to potential cumulative impacts to public services would be less than significant.

9.2.7 Recreation (Operation)

As previously discussed, current population forecasts for the region anticipate population to decline over the next few decades. However, LA County's assessment of park needs in the region determined that existing recreational facilities are not sufficient to meet the demand of the current population. Implementation of the Plan, in conjunction with the Emerald Necklace Implementation Plan and Bicycle Master Plan, along with the development of other expanded parks and recreational facilities in the County, would result in a cumulatively beneficial impact to recreation with improved access to recreational facilities and meeting the recreational demands as determined by LA County. In addition, the implementation of these plans could increase the use of existing neighborhood or regional parks as the active transportation infrastructure would provide additional access to these facilities and could

result in cumulatively considerable impacts to these facilities. Implementation of **MM REC-1: Coordinate with Park Departments/Agencies**, to coordinate with parks departments and agencies prior to development of individual projects, would reduce the Plan's contribution to this cumulatively considerable impact to less than significant with mitigation.

9.2.7.1 Findings

Even with the implementation of mitigation measures, the Plan's contribution to potential cumulative impacts to recreation could be cumulatively considerable depending on the location of individual Projects.

9.2.8 Tribal Cultural Resources (Construction and Operation)

The Plan Area is considered sensitive for tribal cultural resources in the region. Depending on the location of individual projects, the potential exists that adverse impacts to tribal cultural resources could occur. With implementation of mitigation measures which require avoiding sites with known tribal cultural resources (**MM TCR-1: Tribal Cultural Resources Assessment**) or preparing appropriate treatment plans (**MM TCR-2: Avoid Tribal Cultural Resources, Prepare Treatment Plan** and **MM TCR-4: Conduct Native American Monitoring**), and unanticipated discovery plan (**MM TCR-3: Unanticipated Discovery**), impacts would be reduced but would remain potentially significant and unavoidable. Similar mitigation measures are required for the Emerald Necklace Implementation Plan, and it is anticipated that similar mitigation measures would be implemented for projects developed under the Bicycle Master Plan that could affect tribal cultural resources. Therefore, effects to tribal cultural resources would not be cumulatively considerable.

9.2.8.1 Findings

With the implementation of mitigation measures, the Plan's contribution to potential cumulative impacts to tribal cultural resources would be less than significant.

9.2.9 Utilities (Construction and Operation)

The Plan would not have a significant adverse impact on utilities such as wastewater services, water services, or solid waste disposal services, although construction activities of individual projects may result in the relocation of existing utilities. Implementation of **MM UTIL-1: Prepare and Implement Utilities Plan** would ensure that any projects that require relocation of existing utilities coordinate with service providers in advance to ensure there is sufficient capacity prior to construction. All projects implemented under the Plan, along with any other development in the region, including projects completed under the Emerald Necklace Implementation Plan and Bicycle Master Plan, would be required to comply with utility regulations and address site-specific utilities issues. The Emerald Necklace Implementation Plan included only one project that would require drinking fountain or restroom facilities, and the Bicycle Master Plan does not include installation of any infrastructure other than a transportation network. Therefore, cumulative impacts to utilities and service systems would not be cumulatively considerable.

9.2.9.1 Findings

With the implementation of mitigation measures, the Plan's contribution to potential cumulative impacts to utilities would be less than significant.

9.3 Considerable Contribution to Cumulative Impacts

For the following resource categories, even with the implementation of mitigation measures (where feasible), the Project contribution to cumulative impacts may be considerable:

- Land Use and Planning
- Recreation
- Wildfire

Each is described in detail below.

9.3.1 Land Use and Planning (Construction and Operation)

The Plan, when considered in conjunction with other future developments that occur based on growth projections, would not increase the intensity of land uses in the area. The Plan has the potential to contribute to cumulative but not considerable impacts due to increased recreational use, potentially in areas not previously accessible to the public. Further, the Plan, when considered in combination with the Emerald Necklace Implementation Plan and Bicycle Master Plan, would result in cumulatively beneficial impacts with regard to physically connecting established communities via a more extensive active transportation network.

However, projects implemented under the Plan could potentially result in significant and unavoidable conflicts with general plan and zoning designations of individual cities, as projects conducted by the County are not required to comply with local regulations, and the County does not have the authority to enforce mitigation measures in instances where projects are located in other municipalities. Where projects may pose a conflict with the local land use designations/zoning, mitigation measures can and should be adopted by such other agency. Accordingly, when considered with other regional plans and local land use plans, the Plan could result in a cumulatively considerable land use impact.

9.3.1.1 Findings

While there is no existing cumulative condition with respect to land use and planning; implementation of the Plan could result in a cumulatively considerable contribution to land use and planning impacts.

9.3.2 Recreation (Operation)

As the Plan consists of the development of recreational facilities, the overall construction and maintenance activities associated with development of future individual projects under the Plan, in combination with projects developed under the Emerald Necklace Implementation Plan and Bicycle Master Plan, could result in significant and unavoidable impacts related to physical adverse effects to the environment, even with the implementation of mitigation measures. This would be considered a cumulatively considerable adverse impact, and the Plan contribution to this cumulative impact could be significant and unavoidable depending on the location of individual projects.

9.3.2.1 Findings

Although mitigation measures have been required in, or incorporated into, the proposed Project that would avoid or substantially lessen the significant environmental effect as identified in the Final PEIR, depending on future project locations, impacts would be potentially remain significant and unavoidable.

9.3.3 Wildfire (Construction and Operation)

Implementation of the Plan would not impair an adopted emergency response plan or emergency evacuation plan, result in increased fire risk in high hazard areas, require the installation or maintenance of associated infrastructure that may exacerbate fire risk or would it result in the development of any structures for human occupancy that could be adversely affected by wildfires, nor would it expose people or structures to significant risks, including the downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. However, individual projects implemented under the Plan if located in a VHFHZ would increase the number of people recreating in such area which could result in a significant impact in the event of a wildfire. Although implementation of **MM WF-1: Construction Coordination with Emergency and Fire Services** would require coordination with emergency and service providers; **MM WF-2: Construction Fire Prevention Plan** and **MM WF-3: Operations Fire Prevention Measures** would require the project proponent to prepare a construction fire protection plan and implement operational fire prevention measures, respectively, the possibility remains that future project locations may be sited in or near SRAs or lands classified as VHFSZ, or project sites could feature conditions that would present additional wildfire risks; therefore, construction and operation impacts, even with mitigation measures, remain significant and unavoidable. Similarly, neither the Emerald Necklace Implementation Plan nor the Bicycle Master Plan would result in development of any structures for occupancy or result in increased fire risks in high hazard areas. However, depending on the location of individual projects developed under the Plan, it could result in an increase in recreationalists spending time in a high fire hazard area, which could expose people to significant risks and result in a significant and unavoidable impact. The geographic scope of the Emerald Necklace Implementation Plan is outside of designated high hazard areas. Portions of the Bicycle Master Plan network are within high hazard areas. Therefore, when considered in combination, cumulative risks related to wildfire or wildfire risk would be considerable with regard to more people being exposed to effects of wildland fires.

9.3.3.1 Findings

Even with the implementation of mitigation measures, cumulative risks related to wildfire and wildfire risk would be considerable.

SECTION 10 Findings Regarding Project Alternatives in the PEIR

Section 15126.6 of the State CEQA Guidelines requires an evaluation in a Draft EIR of the comparative effects of a reasonable range of alternatives to a project that would feasibly attain most of the project's basic objectives and would avoid or substantially lessen any of the significant impacts of the project. A feasible alternative is one that can be accomplished successfully in a reasonable period of time, taking into consideration economic, legal, social, and technological factors. However, the State CEQA Guidelines state that an EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote or speculative (Section 15126.6 (f)(3)) of the State CEQA Guidelines). CEQA requires that an EIR include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed program (Section 15126.6(d)) of the State CEQA Guidelines).

10.1 Alternatives Considered in the PEIR

10.1.1 Alternative 1 – Reduced Plan Area Alternative

Under this Alternative, the Plan Area would be restricted to the District ROW, and no project components would be constructed or operated on parcels adjacent to or outside of the District ROW. Implementation of this alternative would meet all of the Plan objectives. However, components such as pocket parks and greenspaces and safe crossings would commonly be located in adjacent parcels outside of the District ROW, and without those areas, opportunities for future projects to be implemented under the Plan would be limited and implementation of this alternative may not fully meet the overall goal of the Plan to expand the active transportation network in the SGV or the objective of enhancing connectivity to schools, parks, transit, jobs, and other local points of interest. Additionally, without safe crossings, the network may not be fully connected and would include trails that start and stop along the District ROW.

As all projects implemented under the Plan would follow the *Design Guidelines and Standards,* implementation of this alternative would minimize or avoid the potential for significant and unavoidable land use conflicts that could occur if components were built on adjacent parcels under the jurisdiction of local municipalities. In addition, the potential for adverse impacts to cultural resources, tribal cultural resources, and biological resources during construction of individual projects implemented under this Alternative would be somewhat reduced due to the decreased footprint of disturbance. Therefore, because this alternative is feasible, would meet most of the project objectives, and would reduce or avoid significant impacts identified for the Plan, it was carried forward for full analysis in the PEIR.

10.1.1.1 Rationale for Not Selecting Alternative 1

Implementation of Alternative 1 – Reduced Plan Area, would avoid the significant and unavoidable impact of potential land use conflicts identified in the Plan, which could occur if an individual project

proposed components on a parcel adjacent to the District ROW for which the zoned use is incompatible. Alternative 1 would also potentially reduce other impacts related to agriculture and forestry resources, biological resources, cultural resources, mineral resources, and public services, because implementation of the Plan would be limited to disturbances only on the District ROW which are already known to be disturbed and not zoned for agricultural or mineral resources. Under the Plan these impacts would be less than significant or less than significant with mitigation; therefore, the selection of Alternative 1 would not result in a substantial difference or improvement in environmental impact of the Plan overall. However, because it would avoid a potentially significant and unavoidable impact and minimize other potential impacts, Alternative 1 is considered the environmentally preferred alternative. The rationale for not selecting Alternative 1 is due to the reduction of areas available for projects within the Plan Area limiting the number of projects that would be implemented under the Plan and associated components such as parks and safe crossings.

10.1.2 Alternative 2 – Reduced Component Alternative

Under this Alternative 2, the Plan would be revised to include only greenway paths and amenities and safe crossings. The Plan Area would remain the same. The Plan components not included in this alternative are pocket parks and additional stormwater measures beyond those required by the *Design Guidelines and Standards*.

Alternative 2 would meet the overall goal of the Plan to expand the active transportation network throughout the SGV, enhancing connectivity, increasing recreational opportunities, promoting equitable practices, and enriching community well-being. Since stormwater BMPs are required to treat a site's stormwater quality design volume where new infrastructure is proposed, Alternative 2 would still meet the objective of integrating stormwater management, but to a lesser degree than the Plan. However, this alternative would not meet the objective of enhancing natural habitats, as pocket parks and greenspaces provide an opportunity to enhance natural habitats and increase vegetated areas.

Focusing the plan on greenway paths, associated amenities and safe crossings would reduce the disturbed area to discover cultural resources and tribal cultural resources and/or impact biological resources during construction, as project opportunities outside of the District ROW on adjacent parcels would be limited to safe crossings that have a much smaller area of disturbance than a pocket park or greenspace. Therefore, overall construction activity and ground disturbance would be minimized. It would also potentially reduce significant and unavoidable impacts related to increases in ambient noise levels, as recreationalists along the greenway path would be constantly moving through the network, whereas recreationalists at pocket parks and greenspaces are more likely to remain for a longer duration of time and enjoy active play at the park. Therefore, because this alternative is feasible, would meet most of the project objectives, and would reduce or avoid significant impacts identified for the Plan, it was carried forward for full analysis in the PEIR.

10.1.2.1 Rationale for Not Selecting Alternative 2

Implementation of Alternative 2 – Reduced Plan Components, would not completely avoid potentially significant and unavoidable impacts in ambient noise increases, but would reduce the potential for impacts through the elimination of pocket parks from the Plan. Otherwise, the potential for adverse

impacts would be similar to the Plan for all resource categories. The rationale for not selecting Alternative 2 is due to the reduced potential for beneficial impacts of the Plan with regard to improved wildlife connections and increases in parks and open space which have been identified as a need in the SGV.

10.1.3 No Project Alternative

As required by the State CEQA Guidelines Section 15126.6(e), a No Project Alternative:

> ...shall be evaluated along with its impact. The purpose of describing a No Project Alternative is to allow decision makers to compare the impacts of approving the proposed project with the impact of not approving the proposed project. The No Project Alternative analysis is not the baseline for determining whether the proposed project's environmental impacts may be significant, unless it is identical to the existing environmental setting analysis which does not establish the baseline.

Under the No Project Alternative, the SGV Greenway Network Strategic Implementation Plan would not be adopted. Development of bicycle paths and stormwater improvements along the District ROW in the SGV could continue via individual projects implemented by the County in accordance with the 2012 Bicycle Master Plan and 2015 Los Angeles County Enhanced Watershed Management Plan. Similar to the Plan, these other plans provide information on potential project opportunities and sites, along with guidance in how to complete a project, but do not dictate that any specific projects be completed within any specific timeline. Therefore, full implementation of either plan, and associated goals and anticipated benefits such as improved air quality, reduced flooding and increased groundwater recharge, as well as increased recreational opportunities, may or may not be realized.

The 2017 motion that directed the development of the Plan stated "The collaborative planning between various stakeholders in the past has resulted in the construction of Class 1 bike paths along channels like the San Gabriel River and Rio Hondo and within the Rio Hondo Coastal Basin Spreading Grounds. These examples can be used as models for expanding the active transportation system throughout the San Gabriel Valley. Although many communities are independently pursuing greenways, these efforts in large part lack a holistic and methodical regionwide implementation strategy, resulting in a fragmented trail network and a demonstrated need for an updated comprehensive plan" (LA County Board of Supervisors 2017). Therefore, the No Project Alternative assumes that it is reasonably foreseeable that individual municipalities within the Plan Area would continue to develop and implement individual recreational improvement projects within their cities on a project-by-project basis. These projects would have to be completed in accordance with individual city general plans and policies, including those related to water and energy conservation, land use compatibility, and recreational goals. However, there would be no coordinated plan or effort specific to improving the connectivity of greenway alignments in the SGV. Under the No Project Alternative, comprehensive improvements, guided by the six multi-benefit goals of the Plan along with the *Design Guidelines and Standards*, for greenway paths, amenities, and other components would not occur. As projects are completed over time, there would not be a cohesive aesthetic between various segments of greenway path in the Plan Area, ensuring that the cumulative total of all projects developed meet the six goals defined for the Plan.

Because the activities under No Project could be similar to that of the Plan, the following differences drive the comparative analysis of impacts. Individual projects would not have the same requirements for compliance with the *Design Guidelines and Standards*, which have been developed to ensure that projects developed under the Plan are energy and water efficient, manage stormwater runoff, and develop a consistent aesthetic along the entire length of the Greenway Network. The Plan requires a specific plant palette for revegetation after construction that would not be a requirement under the No Project alternative. In addition, projects developed under the No Project Alternative could consist of much larger projects than described in the Plan, which could result in greater intensity and duration of construction activity.

10.1.3.1 Rationale for Not Selecting No Project Alternative

Although impacts under the No Project Alternative would be largely similar to the Project, it would potentially result in greater significant impacts with regard to aesthetics, air quality, GHG, and biological resources because individual projects would not have the same requirements for compliance with the *Design Guidelines and Standards*, which would ensure that projects developed under the Plan are energy and water efficient, and develop a consistent aesthetic along the entire length of the Greenway Network. In addition, projects developed under the No Project Alternative could consist of much larger projects than described in the Plan which could result in greater intensity and duration of construction.