

**COMMENT No. 7**

August 4, 2003

Jeffrey M. Smith, AICP  
Senior Regional Planner  
Intergovernmental Review  
Southern California Association of Governments  
818 West Seventh Street, 12<sup>th</sup> Floor  
Los Angeles, CA 90017-3435

**Comment 7.1:**

RE: SCAG Clearinghouse No. 120030425 Mountaingate

Thank you for submitting the Mountaingate for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, project, and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

We have reviewed the Mountaingate, and have determined that the proposed project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) *Guidelines* (Section 15206). The proposed project is not a residential development of more than 500 dwelling units. Therefore, the proposed project does not warrant comments at this time. Should there be a change in the scope of the proposed project, we would appreciate the opportunity to review and comment at that time.

A description of the proposed project was published in SCAG's July 16–31, 2003 Intergovernmental Review Clearinghouse Report for public review and comment.

The project title and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning this project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact me at (213) 236-1867. Thank you.

**Response 7.1:**

It is noted that SCAG has determined that the project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) *Guidelines* (Section 15206).

**COMMENT No. 8**

September 3, 2003

James A. Noyes, Director of Public Works  
Rod H. Kubomoto, Assistant Deputy Director  
Watershed Management Division  
County of Los Angeles Department of Public Works  
900 South Fremont Avenue  
Alhambra, California 91803-1334

**Comment 8.1:**

Response to a Draft Environmental Impact Report  
Mountaingate Project  
City of Los Angeles

Thank you for the opportunity to provide comments on the subject document. The proposed project is the last phase of development within the Mountaingate Community. The project proposes to subdivide approximately 449 acres into 32 lots. Twenty-nine lots will be used to construct 29 single-family homes, estate sized lots, and private streets that will be constructed on 25.4 acres within the 449-acre project site. The remaining 424 acres will be preserved as permanent open space with no additional development permitted. The site is located at 2050 Stoney Hill Road and Canyon Back Road in the City of Los Angeles. We have reviewed the submittal and offer the following comments:

**Environmental Programs**

Section IV.Q, under "Solid Waste," (instead of Section VII) of the document should discuss and address the following issues and requirements. As projected in the Los Angeles County Countywide Siting Element, which was approved by a majority of the cities in the County of Los Angeles in late 1997 and by the County Board of Supervisors in January 1998, a shortfall in permitted daily landfill capacity may be experienced in the County within the next few years. The construction activities associated with the proposed project and the post-development operation over the life of the proposed project will increase the generation of solid waste. These issues are discussed in Section VII under "Solid Waste." However, because the proposed project is part of a large tract development to be constructed in phases (some which are completed), the cumulative effect of developing the tract should be considered. This cumulative effect will have significant and negative impact on the solid waste management infrastructure in the County unless mitigation measures are incorporated. Therefore, the project should be mandated to recycle solid waste as discussed in Section VII, and the proposed environmental document should identify any other measures the project proponent plans to implement to mitigate the impact. Mitigation measures may include implementation of waste reduction and recycling programs to divert the solid waste, including construction waste, from the landfills.

**Response 8.1:**

All applicable City guidelines regarding recycling of solid waste during both the construction and operation phases of the project will be followed. Please see page VII-4 of the Draft EIR. The last sentence reads: In order to ensure that the 50 percent solid waste diversion rate is attained, standard City solid waste reduction regulations would be imposed on the project that mandates the residences to recycle solid waste. Please see **Response to Comment 1.4**. Page VII-4 of the Draft EIR is revised to state that City of Los Angeles construction and demolition (C&D) recycling guidelines are required to be used during the construction phase of the project.

The proposed project is the final phase of master planned project. As described in the Project Description, heading C, Project History and Background beginning on page II-2 of the Draft EIR, the project was originally approved for a total of 870 units. Approximately 300 homes have been approved, and most are built. Although the applicant is entitled to build the 570 additional residential dwelling units under the approved master Tract Map, the proposed project would develop only 29 additional lots. No more development will be proposed within this tract. Therefore, there is no potential for a cumulative impact on solid waste over the life of a master planned project as suggested in this comment.

**Comment 8.2:**

Section IV.R, "Safety," of the document should discuss and address the following issues and requirements. Because the project site is located on or within 1,000 feet of a landfill containing decomposable material, the document should discuss subsurface lateral migration of landfill gas into enclosed buildings and structures, and its mitigation measures, if needed.

If you have any questions, please contact Mr. William Fong at (626) 458-3851.

**Response 8.2:**

The Draft EIR, in Section IV.R, Safety, does address landfill gas. The landfill was required to install an extensive landfill gas monitoring system to monitor for the presence of landfill gas at the perimeter of the landfill to evaluate whether landfill gas is migrating from the landfill and has installed a gas collection system. Any modifications to the existing landfill gas collection system and drainage systems will be subject to the review and approval of the agencies with jurisdiction over the maintenance of the landfill.

Methane (CH<sub>4</sub>) is an odorless, colorless, non-carcinogenic gas that is lighter than air and is the primary component of commercial natural gas that fuels home heating and cooking appliances. Methane gas is combustible when mixed in appropriate ratio with air. Methane mixtures with air are combustible at concentrations between 5 and 15 percent by volume. The 5 percent concentration is called the Lower Explosive Limit (LEL). Below 5 percent, there is insufficient methane for combustion, and above 15 percent, there is insufficient oxygen for combustion. The 15 percent concentration is called the Upper Explosive Limit (UEL). However, it is important to note that concentrations of methane above 15 percent are considered as dangerous as concentrations between 5 percent and 15 percent because dilution in air may eventually cause the methane concentrations to drop to the explosive range.

Production of methane is a ubiquitous ecological phenomenon that can occur when natural soil bacteria biodegrade organic matter, such as decaying domestic refuse placed in a landfill. The bacterial decay process is complex, involving a consortium of fermentative, acetogenic, and methanogenic bacteria. In landfills, there is an abundance of organic matter that is decaying, and the rate of decay and methane generation is proportional to the amount of moisture available. The strength and rate of methane gas

production decreases with time, but methane gas production may continue to occur for many years after the landfill is closed.

This methane gas may migrate laterally or vertically, depending on the presence of preferential pathways located within the landfill and pressure differentials that stimulate gas migration. For this reason, the lots located within 1000 feet of the landfill will be fitted with methane-mitigation measures pursuant to state and City regulations. Typically these requirements include placement of a physical barrier to prevent movement of methane gas into the structure, as well as a passive venting system to act as a secondary barrier to further protect the structure. Additionally, utility vaults will be fitted with venting devices and sealed to prevent movement of methane gas into the vault and utility trenches will be fitted with dams to prevent the movement of methane gas along utility trenches. The construction methods and materials to implement these regulations are well known and can be reliably applied to protect structures. The above-mentioned items are per the City of Los Angeles Building Code (Section 7100 et seq.) and the California Code of Regulations (Title 27), which has established design and construction requirements for structures located in potential methane-producing areas. In addition, the City of Los Angeles is considering adopting an ordinance that would amend Sections 91.7101 et seq. to provide minimum Citywide standards for the construction of buildings to control methane intrusion. The proposed project will comply with all applicable standards.

Mission Canyon 8 Landfill has a number of features and procedures in place to mitigate the potential movement of landfill gas from the vicinity of the landfill. These mitigation measures include an active landfill gas collection system using a landfill gas collection wells. A slight vacuum is applied to these collection wells, causing the landfill gas to move toward the wells to be collected and conveyed by pipelines to a landfill gas collection system. The collected gas is then either (1) concentrated for sale as a fuel source under contract to the University of California, Los Angeles or (2) combusted using a flare.

Mission Canyon 8 Landfill is actively monitored for methane gas emissions pursuant to Section 1150.1 regulations established by the South Coast Air Quality Management District (SCAQMD). This monitoring program consists of monitoring for methane gas at the surface of the landfill as well as the presence of methane in boundary probes located outside the landfill. In the event that methane gas is detected at the landfill surface or in the boundary probes, then the gas collection system is adjusted to capture these emissions. As part of the proposed development, some of the boundary probes will be removed. The affected boundary probes will be replaced and repositioned between the landfill boundaries and the proposed development. The relocated probes will then be added to the 1150.1 monitoring program.

The additional information regarding methane gas does not change the analysis or conclusion in the Draft EIR that no significant impact will result.

**Comment 8.3:**

Flood Maintenance

If the project requires flood control facilities to be maintained by the Public Works, plan review will be required by Design and Flood Maintenance Divisions. At that point, we would be able to provide specific comments to the project.

If you have any questions, please contact Mr. Jerry Burke at (626) 458-4114.

**Response 8.3:**

If the proposed flood control facilities (the debris/detention basin) are to be maintained by the County of Los Angeles Department of Public Works Design and Flood Maintenance Divisions, the plans will be submitted to that agency for review.

**Comment 8.4:**

Geotechnical and Materials Engineering

The proposed project will not have significant environmental effects from a geology and soil-standpoint provided the appropriate ordinances and codes are followed. Portions of the project are located within mapped potential seismically induced landslide areas, per the State of California Seismic Hazard Zone Map, Beverly Hills Quadrangle. However, seismic slope stability analyses are not warranted at this time. Detailed seismic stability analyses, conforming to the requirements of the State of California Division of Mines and Geology Special Publication 117, must be conducted at the tentative map and/or grading/building plan stages.

If you have any questions, please contact Mr. Amir Alam at (626) 458-4925.

**Response 8.4:**

Detailed slope stability analyses (static and pseudostatic) have been performed for the natural and proposed manufactured slopes at the project site. The proposed manufactured slopes are considered grossly stable. The adjacent natural slopes will require mitigation in order to meet code requirements. The proposed mitigation alternatives include removal of landslides and their replacement with compacted fill, construction of buttress fills and caisson systems, and structural setbacks. The discussion and the results of these analyses are presented in a geotechnical report prepared by Leighton & Associates, Inc., dated March 18, 2003. These analyses will be updated as warranted in the subsequent grading/building plan stages for this project.

The applicant intends to conduct detailed seismic stability analyses, conforming to the requirements of the State of California Division of Mines and Geology, Special Publication 117, at the Tentative Map and/or grading/building plan stages. Results of these analyses will be submitted to the County of Los Angeles Department of Public Works Geotechnical and Materials Engineering Division for review.

**Comment 8.5:**

Land Development

Drainage and Hydrology

We have reviewed the subject document and have no comments at this time.

If you have any questions, please contact Mr. Michael Hales at (626) 453-4921.

**Response 8.5:**

It is noted that the County of Los Angeles Department of Public Works Land Development Division, Drainage and Hydrology, has reviewed the Draft EIR and has no comments.

**Comment 8.6:**

Transportation Planning

We have reviewed the subject document and have no comments at this time.

If you have any questions, please contact Mr. Hubert Seto at (626) 458-4349.

**Response 8.6:**

It is noted that the County of Los Angeles Department of Public Works, Land Development Division, Transportation Planning, has reviewed the Draft EIR and has no comments.

**Comment 8.7:**

Traffic and Lighting

We have reviewed the subject document and have no comments.

If you have any questions, please contact Ms. Jennifer Frary at (626) 300-4792.

**Response 8.7:**

It is noted that the County of Los Angeles Department of Public Works Traffic and Lighting Division has reviewed the Draft EIR and has no comments.

**Comment 8.8:**

Watershed Management

The proposed project should include investigation of watershed management opportunities to maximize capture of local rainfall on the project site, eliminate incremental increase in flows to the storm drain system, and provide filtering of flows to capture contaminants originating from the project site.

**Response 8.8:**

Water quantity and quality issues are addressed by the proposed debris/detention basin. It is noted that the County of Los Angeles Department of Public Works Watershed Management Division has reviewed the Draft EIR and has no comments, assuming the guidelines provided in **Comments 8.8** and **8.9** are followed.

**Comment 8.9:**

Santa Monica Bay

After reviewing the subject document, we recognize that under the water section there are no significant impacts identified. Since the construction area is greater than five acres, a National Pollutant Discharge Elimination System Permit and Storm Water Pollution Prevention Plan are required in order to obtain a grading permit. Assuming that these guidelines are followed, we have no comment.

If you have any questions, please contact Mr. Brian White at (626) 458-4368.

If you have any questions regarding the above comments of the environmental review process of Public Works, please contact Ms. Massie Munroe at the above address of at (626) 458-4359.

**Response 8.9:**

The applicant will obtain a National Pollutant Discharge Elimination System (NPDES) Permit and prepare a Storm Water Pollution Prevention Plan (SWPPP) in order to obtain a grading permit. It is noted that the County of Los Angeles Department of Public Works Watershed Management Division has reviewed the Draft EIR and has no comments, assuming the guidelines provided in County of Los Angeles Department of Public Works **Comments 8.8** and **8.9** are followed.

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