

Section 6

Additional CEQA Analysis

This section contains additional environmental analyses required in the State CEQA Guidelines for environmental impact reports.

6.1 SIGNIFICANT UNAVOIDABLE IMPACTS

An EIR must address any significant effect on the environment that cannot be avoided if the project is implemented (Public Resources Code Section 21100(b)(2)(B)).

6.1.1 Air Quality

Construction Impacts. As identified in Section 4.1, impacts to air quality from construction of the proposed project are significant and would likely still exceed significance thresholds established by the SCAQMD even with implementation of feasible mitigation measures. These construction effects will be temporary and the true magnitude of the emissions will depend on the contractor and equipment choices made for the each component. Project phasing will also influence the total emissions at any given time from project construction – if more than one element is constructed at the same time, overall project-related emissions would be additive for the length of the overlap in construction schedules. Mitigation measures A-1 through A-14 have been identified to reduce construction-related emissions to the extent feasible.

Operational Impacts. Operation of the proposed project would result in minor, less than significant impacts on air quality and in beneficial impacts related to tree planting and mulching.

6.1.2 Biological Resources

Section 4.2 discusses the potential significant adverse impacts on biological resources that may be present on project sites that could not be surveyed (gravel pits). If threatened or endangered plant or animal species are present on the unsurveyed project sites (or New Park on Wentworth where a focused survey is recommended), disturbance to these species from project construction could be deemed significant even if authorized by the relevant wildlife agencies. Significant unavoidable impacts to biological resources are therefore possible, but not expected, and will be fully evaluated in subsequent analyses (see Section 4.2.8). If sensitive resources are found, project re-design to avoid and protect the sensitive species will be the first consideration. However, depending on the location of sensitive resources at the sites, if any, project redesign that avoids the biological resources while still meeting the flood control objective of the project component may be infeasible.

6.2 SIGNIFICANT, IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Guidelines (Sections 15126 and 15127) require that an EIR identify any significant irreversible changes that would result from project implementation. Section 15126.2(c) of CEQA Guidelines provides guidance as to what sorts of changes might be considered

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irreversible. Such changes include commitment of nonrenewable resources to uses that future generations will probably be unable to reverse and environmental accidents that could occur as a result of the project.

No significant, irreversible impacts have been identified for the project. Construction of the project components and, to a lesser extent project maintenance, would result in the consumption of nonrenewable vehicle and equipment fuels. However, the volume of this fuel use is considered limited and less than significant. Additionally, mitigation measure A-14 (Section 4.1) will be considered by the County during the implementation of components with more extensive construction. This measure calls for the use of alternative fuel vehicles and equipment to the extent feasible and would reduce the unavoidable consumption of traditional fossil fuels from implementation of the project.

6.3 IMPACTS FOUND TO BE LESS THAN SIGNIFICANT

Table 6-1 summarizes potential environmental impacts of the proposed project found to be less than significant, as well as beneficial impacts and impacts mitigated to levels of less than significant, as required by Public Resources Code section 21100(c).

**Table 6-1
Summary of Less than Significant Impacts**

Topic	Beneficial Impact	Less than Significant Impact		Potentially Significant Impact but Mitigation Identified to Reduce Impacts Below a Level of Significance	Reference
		No Mitigation Proposed	Mitigation Identified to Further Reduce Adverse Effects		
Aesthetics	X	X			Appendix B (Initial Environmental Study)
Agricultural Resources		X			Appendix B
Air Quality*	X	X	X		Section 4.1
Biological Resources*	X		X		Section 4.2
Cultural Resources		X		X	Section 4.3
Geology and Soils		X		X	Section 4.4
Hazards and Hazardous Materials			X	X	Section 4.5
Hydrology – Drainage and Flooding	X	X			Section 4.6
Hydrology – Water Quality	X	X	X	X	Section 4.7
Land Use		X			Appendix B and Section 6.5
Mineral Resources		X			Appendix B and Section 7.8
Noise		X		X	Section 4.8
Population and Housing		X			Appendix B
Public Services		X		X	Section 4.9
Recreation	X	X			Section 4.10
Traffic and Transportation		X		X	Section 4.11
Utilities		X		X	Section 4.12

* See also Section 6.1, above.

6.4 GROWTH INDUCING IMPACT

Section 15126.2(d) of the CEQA Guidelines states that an EIR should discuss “...the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.” Growth can be induced in a number of ways, including through the elimination of obstacles to growth, or through the stimulation of economic activity within the region.

The proposed project does not involve construction of new homes or businesses and does not include construction of new, potentially growth-inducing, infrastructure such as roads or potable

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water or wastewater systems. However, the project does include infiltration of stormwater, which will increase the volume of available groundwater. Since no new potable water treatment or distribution systems are proposed, this element of the project is not considered growth inducing. The proposed project would provide flood control benefits to areas that have already been developed with residential, commercial, and industrial uses. Therefore, it would not result in the elimination of obstacles to growth. No growth inducing impacts would occur.

6.5 CONSISTENCY WITH LOCAL AND AREAWIDE PLANNING

CEQA Guidelines Section 15125(d) requires that EIRs discuss any inconsistencies between the proposed project and applicable general plans and regional plans.

6.5.1 City of Los Angeles General Plan

The project area for the Watershed Management Plan is within the City of Los Angeles. The City of Los Angeles General Plan is the primary document containing goals and policies for implementing the development and conservation proposals of the City of Los Angeles. The General Plan consists of 10 city-wide elements and the land use element for each of the city's 35 Community Planning Areas. The project area encompasses two Community Planning Areas – Sun Valley-La Tuna Canyon and North Hollywood.

Table 6-2 summarizes City of Los Angeles General Plan Land Use Element policies potentially relevant to the Watershed Management Plan. Project consistency with each of these policies is discussed.

Table 6-2
Project Consistency with City of Los Angeles General Plan Policies

No.	Policy	Sun Valley Watershed Management Plan	Consistency with Sun Valley Watershed Management Plan
Sun Valley – La Tuna Canyon Community Plan¹			
3-1.4	<p>The utilization of sand and gravel areas shall be conducted in such a way as to conserve sand and gravel resources for future availability and use, minimize the impact of extractive activities upon residential and commercial areas, and provide for the reclamation and reuse of exhausted pits. Program: Where located near to residential areas, consideration should be given to setting aside portions of reclaimed sites for open space or recreational uses.</p> <p>Program: Consideration should be given to the future potential use of the Department of Water and Power Valley Steam Plant site as a sand and gravel extraction site.</p>	<p>The project would result in reclamation of one or more gravel pits (Cal Mat Pit, Sheldon Pit, and/or Strathern Pit) for open space and recreational uses.</p> <p>Valley Steam Plant is currently in the process of being converted to a natural gas facility which will extend the site life of the facility. The proposed project component at this location would occur on <10 acres of an approximately 155-acre site. Implementation of this component would therefore not preclude the future potential use of the Valley Steam Plant as a sand and gravel extraction site.</p> <p>The project would increase park land by designing some of the stormwater management facilities to also serve as public parks. The proposed park sites include reclaimed gravel pits.</p>	
4-3.1	<p>Develop new neighborhood and community parks to help offset the Community Plan areas parkland deficiency for its current population and its projected year 2010 population.</p> <p>Program: Work with the Recreation and Parks Department in setting aside portions of reclaimed sand and gravel mining sites for open space or recreational uses (see Policy 3-1.4).</p>		
North Hollywood Community Plan²			
p. III-1	<p>The Plan encourages the preservation of low density single-family residential areas, the conservation of open space lands and the concentration of commercial and residential development into the North Hollywood Center (business district and environs); these are intended to be connected to other major Centers of the City by a rapid transit network.</p> <p>The Plan stresses the need for the improvement of existing public facilities and the provision of additional facilities to satisfy the needs of both the present and projected populations.</p>	<p>The project would contribute to preservation and enhancement of open space lands by converting a power line easement into park space.</p> <p>The project would provide additional public facilities, including stormwater management facilities and parks.</p>	
p. III-6	<p>The Plan urges the continued improvement of park and recreational facilities so as to maximize their utility. It also proposes utilization of flood control and power line right-of-ways for open space purposes and/or hiking and bicycle trail where appropriate.</p>	<p>The Power Line Easement component of the project would utilize power line right-of-way for open space and recreation purposes.</p>	

Sources: 1 City of Los Angeles, 1999.
2 City of Los Angeles, 1996.

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6.5.2 City of Los Angeles Zoning Code

6.5.2.1 Consistency with Zoning Designations

Table 6-3 presents the existing zoning designations of the proposed project sites. Under some components of the Watershed Management Plan, privately-owned parcels will be acquired and developed, which will result in land use changes. Some of the project components involve conversion of existing land uses to public parks. Others involve construction of subsurface structures or require only minor modifications in site topography, and would not alter the existing land uses.

Public park is a permitted use in the following zones (citations in parentheses indicate the section numbers of the City of Los Angeles Municipal Code): A1 (Sec. 12.05 A4), RA (Sec. 12.07 A4), M2 (Sec. 12.19 A1), M3, (Sec. 12.20 A1), and OS (Sec. 12.04.05 B1(a)(i)). Public utilities and public services uses and structures are permitted uses in the following zones: A, R, C and MR (Sec. 14.00 A6). (Definitions for the zone codes are provided in the footnotes to Table 6-2.)

For the majority of the project components, existing land use and zoning designations are consistent with the proposed uses under the Watershed Management Plan. For two components, Power Line Easement and Strathern Pit, the proposed use is not specifically permitted for the zoning designations present on these sites. Based on preliminary consultations with the City of Los Angeles Department of Building and Safety, it appears that land use approvals (Conditional Use Permit (CUP) or zoning variance) could be required for project implementation at these two sites (B. Quan, pers. comm., 2003).

6.5.2.2 Zoning Supplemental Use District “G” (Surface Mining Districts)

Cal Mat Pit, Sheldon Pit, and Strathern Pit components are located within Zoning Supplemental Use District “G” (Surface Mining Districts), as established by Section 13.03 of the Los Angeles Municipal Code. Surface Mining Districts were created to establish safeguards and controls for production of minerals and to provide for the reclamation of mined lands. Under the California Surface Mining and Reclamation Act (SMARA), all surface mining operations which disturb more than 1 acre or remove more than 1,000 cubic yards of material are required to have an approved reclamation plan. The City of Los Angeles Department of City Planning, as the SMARA lead agency for the project area and in accordance with Section 13.03E and F of the Los Angeles Municipal Code, reviews applications for mining permits and reclamation plans (or amendments thereto). The City Planning Commission has the authority to approve new or amended reclamation plans. The California Department of Conservation Office of Mine Reclamation (OMR) and the State Mining and Geology Board (SMGB) assist local lead agencies in review and enforcement of SMARA.

Approved reclamation plans for Cal Mat Pit (Conrock and California Portland Cement, 1977) and Sheldon Pit (Cal Mat Company, 1990) are on file at the Department of City Planning. Strathern Pit is not listed in OMR’s AB3098 List, which is a quarterly revised list of mines regulated under SMARA with an approved or pending reclamation plan (OMR, 2003), and no reclamation plan for Strathern Pit is on file at the Department of City Planning (R. Giron, pers.

comm., October 2003) or at the California Department of Conservation, OMR (J. Fernandez and A. Yhnell, pers. comm., 2003).

The reclamation plan for Sheldon Pit presents two options for interim uses: a disposal site for sand and debris collected behind Hansen Dam and/or by debris dams, or an inert landfill. With respect to the final use of the site, the plan states that the following are potential appropriate uses: regional park and recreation facilities, golf course, outdoor storage facilities, or any other open space uses. It should be noted that the reclamation plan for Sheldon Pit is described as a conceptual plan that does not provide authority to undertake any reclamation activity.

The reclamation plan for Cal Mat Pit states that the potential uses of the site include open space, industrial/commercial, or recreational uses. Currently, Cal Mat Pit is operated by Vulcan Materials Company as an inert landfill under a solid waste facilities permit from the City of Los Angeles (originally issued by Department of Public Works, now administered by the Department of Environmental Affairs) (M. Rosen, pers. comm., 2003).

The existing reclamation plans for Cal Mat Pit and Sheldon Pit both consider recreation and other open space uses as alternative final land uses. Therefore, the facilities proposed for these two sites under the Watershed Management Plan (parks with stormwater retention basins) would not conflict with the existing reclamation plans. However, if the Department of City Planning, as lead agency for SMARA, determines that the use of Cal Mat Pit or Sheldon Pit as proposed under the Watershed Management Plan is a “substantial deviation” from the existing reclamation plans, an amendment to the existing reclamation plans could be required (State Mining and Geology Board’s Reclamation Regulations, CCR Section 3502(d)).

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**Table 6-3
Zoning Designations and Existing and Proposed Land Uses
of Project Components**

Project Component	Existing Use	Land Use Proposed by Project	General Land Use Designation	Zoning Designation*	Consistency with Zoning
Cal Mat Pit	Gravel pit (inactive)	Public Park	Open Space and Very Low Residential	A1 and RA	Consistent
Parking Lot on Sherman	Commercial buildings	No change in aboveground land use	Light Manufacturing	M2	Consistent
Power Line Easement	LADWP power line right-of-way	Add parks and/or landscaped areas in open spaces between power line towers	Public Facilities	PF	May require CUP or zoning variance
Roscoe Elementary School	LAUSD school	No change in aboveground land use	Public Facilities	PF	Consistent
Sheldon Pit	Gravel pit (inactive); Used for disposal of gravel washwater	Public Park	Open Space	A1	Consistent
Stonehurst Elementary School	LAUSD school	No change in aboveground land use	Public Facilities	PF	Consistent
Stonehurst Park	Community park	No change in aboveground land use	Open Space	OS	Consistent
Strathern Pit	Gravel pit (inactive); Landfill for inert waste (active)	Public Park	Light Manufacturing	M2, M3, and P	May require CUP or zoning variance
Sun Valley Middle School	LAUSD school	No change in aboveground land use	Public Facilities	PF	Consistent
Tuxford Green	Vacant	Landscaped area / garden	Public Facilities	PF	Consistent
New Park on Wentworth	Vacant	Public Park	Very Low Residential	RA	Consistent
Valley Steam Plant	LADWP power plant	No change in primary land use	Public Facilities	PF	Consistent
Vulcan Gravel Processing Plant	Gravel processing facility	No change in primary land use	Heavy Manufacturing	M3	Consistent

CUP: Conditional Use Permit

* Zoning Designations

A1: Agricultural M3: Heavy Industrial P: Automobile Parking
M2: Light Industrial OS: Open Space PF: Public Facilities
RA: Suburban

6.5.3 SCAG Regional Comprehensive Plan and Guide

The Southern California Association of Governments (SCAG) is the metropolitan planning organization for six southern California counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. SCAG is mandated by both the federal and state governments to plan for transportation, growth management, hazardous waste management, and air quality throughout the region. As part of its mandate, SCAG develops demographic projections of each city and unincorporated community within its planning area. The Regional Comprehensive Plan and Guide (RCPG), published by SCAG, is intended to serve the region as a framework for decision-making with respect to the growth and changes that can be anticipated during the next 20 years and beyond (SCAG, 1996).

Table 6-4 summarizes RCPG policies potentially relevant to the Watershed Management Plan. As an environmentally beneficial project, the Watershed Management Plan is considered to be consistent or neutral with regard to RCPG policies.

**Table 6-4
Project Consistency with SCAG Regional Comprehensive Plan and Guide Policies**

No.	Policy	Consistency with Sun Valley Watershed Management Plan
Growth Management Chapter of Regional Comprehensive Plan and Guide		
3.03	The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.	Phasing and implementation of the public facilities proposed under the project are discussed in Section 3 . Since the project is not growth inducing (see Section 6.3), it will not conflict with growth policies for the region. Construction and operation of the project will provide a limited number of jobs but will not impact housing.
3.05	Encourage patterns of urban development and land use that reduce costs on infrastructure construction and make better use of existing facilities.	The project involves construction of facilities to reduce flood hazards in an existing urban area. Existing facilities such as schools, a power line easement, and gravel pits are proposed for use as stormwater management facilities.
3.09	Support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.	The project is a multi-purpose flood control program intended to attract multiple funding partners. Project elements such as park creation, habitat enhancements, water conservation, and air quality improvements are expected to attract new sources of funding for stormwater management facilities.
3.10	Support local jurisdictions' actions to minimize red tape and expedite the permitting process to maintain economic vitality and competitiveness.	The project has been developed in cooperation with and input from the Stakeholders, whose members includes local jurisdictions. Agency participation and consultation during the project development process is expected to expedite the permitting process for the proposed project.
3.18	Encourage planned development in locations least likely to cause adverse environmental impact.	The project includes development of public facilities, including stormwater management facilities, parks, and open space. The project is designed to minimize adverse environmental impacts. Mitigation measures are proposed to minimize adverse impacts where feasible. The proposed project does not involve development of residential, commercial, or industrial facilities.
3.19	Support policies and actions that preserve open space areas identified in local, state, and federal plans.	The Watershed Management Plan includes two components currently zoned as Open Space, Stonehurst Park and Sun Valley Park. The proposed stormwater management facilities at these sites (and other project component areas) are consistent with the maintenance of open space areas. In addition, the proposed project will be creating additional open space areas (e.g., proposed parks at Sheldon Pit, Strathern Pit, and Cal Mat Pit).
3.20	Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands and lands containing unique and endangered plants and animals.	Consistent with this policy, the project includes the creation of new stormwater infiltration facilities and wetlands. However, the presence of rare plant or animal species cannot be excluded from several of the project components (gravel pits and New Park on Wentworth). Prior to construction of any project-related facilities at these locations, appropriate surveys will be conducted. If necessary, mitigation measures will be identified to protect sensitive biological resources.

Table 6-4 (Continued)
Project Consistency with SCAG Regional Comprehensive Plan and Guide Policies

No.	Policy	Consistency with Sun Valley Watershed Management Plan
3.21	Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.	Site-specific surveys for cultural resources have been conducted for the majority of the project components. For several project sites (Cal Mat Pit, Sheldon Pit, and Strathern Pit), surveys for cultural resources could not be conducted during preparation of the Program EIR. Appropriate cultural resources surveys will therefore be conducted as part of future analyses necessary prior to implementation of these project components. Mitigation measures to protect cultural resources will be implemented. (See Section 4.3)
3.22	Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.	The project is designed to reduce flood hazards in the area. Some of the project components involve use of gravel pits with steep side-slopes. Project facilities will be appropriately designed to reduce hazards related to slope instability. The proposed project does not include construction of any habitable structures.
3.23	Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans.	Program-level and site-specific mitigation measures for these resource topics have been identified in the Program EIR (see Sections 4.4 and 4.8). Additional site-specific mitigation measures will be developed in second tier environmental documents as necessary.
3.27	Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as: public education, housing, health care, social services, recreational facilities, law enforcement, and fire protection.	The project has been developed in cooperation with and input from the Stakeholders, whose members includes local jurisdictions and service providers. The project proposes to provide flood protection services and recreational facilities in an underserved community (see Section 4.10.1 regarding the existing level of recreational opportunities in the community planning area).
Regional Transportation Plan Policies		
4.02	Transportation investments shall mitigate environmental impacts to an acceptable level.	The proposed project does not involve transportation investments.
4.04	Transportation Control Measures shall be a priority.	Project construction would result in temporary traffic impacts. Mitigation measures are identified in Section 4.11 to minimize these effects.
4.16	Maintaining and operating the existing transportation system will be a priority over expanding capacity.	The proposed project does not expand the capacity of transportation systems.

Table 6-4 (Continued)
Project Consistency with SCAG Regional Comprehensive Plan and Guide Policies

No.	Policy	Consistency with Sun Valley Watershed Management Plan
Air Quality Chapter Core Actions		
5.07	Determine specific programs and associated actions needed (e.g., indirect source rules, enhanced use of telecommunications, provision of community based shuttle services, provision of demand management based programs, or vehicle-miles-traveled/emission fees) so that options to command and control regulations can be assessed.	Project-related impacts on air quality and transportation would be mostly limited to short-term construction impacts. Air quality is discussed in Section 4.1 and Transportation is discussed in Section 4.11 . Mitigation measures are identified in both section in order to reduce project-related effects. Project consistency with existing and zoned land use is summarized in Section 6.4.3 .
5.11	Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, sub-regional and local) consider air quality, land use, transportation and economic relationships to ensure consistency and minimize conflicts.	
Open Space Chapter Ancillary Goals		
9.01	Provide adequate land resources to meet the outdoor recreation needs of the present and future residents in the region and to promote tourism in the region.	
9.02	Increase the accessibility to open space lands for outdoor recreation.	The proposed project would conserve and create open space by converting exhausted gravel pits, a power line easement, and two undeveloped parcels into public parks and open spaces.
9.03	Promote self-sustaining regional recreation resources and facilities.	
9.04	Maintain open space for adequate protection of lives and properties against natural and man-made hazards.	
9.05	Minimize potentially hazardous developments in hillsides, canyons, areas susceptible to flooding, earthquakes, wildfire and other known hazards, and areas with limited access for emergency equipment.	The project is designed to reduce flood hazards in the area. Some of the project components involve use of gravel pits with steep side-slopes. Project facilities will be appropriately designed to reduce hazards related to slope instability. The proposed project does not include construction of any habitable structures.
9.06	Minimize public expenditure for infrastructure and facilities to support urban type uses in areas where public health and safety could not be guaranteed.	The project involves construction of facilities to reduce flood hazards in an existing urban area.
9.08	Develop well-managed viable ecosystems or known habitats of rare, threatened and endangered species, including wetlands.	The project includes development of wetlands at Sheldon and Strathern gravel pits and other opportunities for enhancement of wildlife habitat areas (other gravel pits and New Park on Wentworth).

Table 6-4 (Continued)
Project Consistency with SCAG Regional Comprehensive Plan and Guide Policies

No.	Policy	Consistency with Sun Valley Watershed Management Plan
Water Quality Chapter Recommendations and Policy Options		
11.02	Encourage “watershed management” programs and strategies, recognizing the primary role of government in such efforts.	The project is a watershed management program proposed by Los Angeles County Department of Public Works for the Sun Valley Watershed.
11.03	Coordinate watershed management planning at the sub-regional level by: (1) providing consistent regional data; (2) serving as a liaison between affected local, state, and federal watershed management agencies; and (3) ensuring that watershed planning is consistent with other planning objectives (e.g., transportation, air quality, and water supply).	The project has been developed in cooperation with and input from the Stakeholders, whose members includes federal, state, and local agencies related to watershed and water resources management.
11.05	Support regional efforts to identify and cooperatively plan for wetlands to facilitate both sustaining the amount and quality of wetlands in the region and expediting the process for obtaining wetlands permits.	The project includes development of wetlands at Sheldon and Strathern gravel pits and other opportunities for enhancement of wildlife habitat areas (other gravel pits and New Park on Wentworth).
11.06	Clean up the contamination in the region’s major groundwater aquifers since its water supply is critical to the long-term economic and environmental health of the region. The financing of such clean-ups should leverage state and federal resources and minimize significant impacts on the local economy.	The project area overlays the eastern portion of the San Fernando groundwater basin, a basin with existing contamination from the solvents PCE and TCE. The Watershed Management Plan does not assist in the clean up of this Superfund site. However, groundwater infiltration associated with the proposed project is also not expected to substantially alter groundwater volumes or flow that would exacerbate the existing groundwater contamination problem (see Section 4.7).
11.07	Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increase use of wastewater should be addressed.	The proposed project includes reuse of stormwater for irrigation and gravel washing (Vulcan Gravel Processing Plant) to replace use by potable water. Irrigation reuse will be for public spaces as well as on individual residences and business properties (reuse of water collected in backyard cisterns). Additionally, implementation of the Watershed Management Plan will increase local groundwater supply by infiltrating stormwater in stormwater management facilities and/or local spreading grounds.

Source of Policies: SCAG, 1996 and SCAG comment letter on the NOP dated December 5, 2002 (see **Appendix B**).