

EXHIBIT 2

August 22, 2011

Ms. Rosa Laveaga
Arroyo Seco Project Supervisor
City of Pasadena
Department of Public Works, Parks & Natural Resources Division
City Yards
233 W. Mountain Avenue, Room 255
Pasadena, CA 91103

For U.S. Mail:
P.O. Box 7115
Pasadena, CA 91105-7215

Subject: Proposal to Prepare a Subsequent Environmental Document to the Certified Master EIR for: 1) the Implementation of Three (3) Hahamongna Watershed Park Projects within the Devils Gate Dam Inundation Area, also Cumulatively Known as the "Hahamongna Multi-Benefit Project" and 2) the Basin Area Component of the "Hahamongna Basin Multi-Use Project" AND Provide Assistance with Acquiring All Necessary Regulatory Permits for the "Hahamongna Multi-Benefit Project" and the "Hahamongna Basin Multi-Use Project" – Foothill Boulevard and Oak Grove Drive, Pasadena, CA

Dear Ms. Laveaga:

Willdan Engineering (Willdan) is pleased to submit this proposal to prepare subsequent environmental documentation pursuant to the California Environmental Quality Act (CEQA) for the Hahamongna Multi-Benefit Project and the Basin Area component of Hahamongna Basin Multi-Use Project ; and to assist the City of Pasadena in acquiring the necessary regulatory permits for the projects. We have enjoyed working with the City and the Parks & Natural Resources Division in the past and would be delighted to assist the City with this project.

Our past experience includes preparing the environmental documentation for several City projects in the Hahamongna Watershed Park, including the Hahamongna Annex Plan and the Eastside Neighborhood-JPL Connector Trail. In addition, Willdan is on the City's list of pre-qualified environmental consultants.

The proposed improvements are described below, and are largely described in the Master Environmental Impact Report (EIR) for the Hahamongna Watershed Park Master Plan. The distinction between the Hahamongna Multi-Benefit Project and the Hahamongna Basin Multi-Use Project is that the latter is part of the City of Pasadena's Proposition 84 Integrated Regional Water Management Plan (IRWMP) grant. The Parks & Natural Resources Division is proposing to undertake the "Basin" component of this IRWMP funding. The balance of the City's portion of IRWMP grant – i.e., the "Caynon" component – will be implemented separately by the Water & Power Department.

The proposed Hahamongna Multi-Benefit Project consists of the following three improvement projects located on the west side of the Hahamongna Watershed Park, west of Devil's Gate Dam:

1. **Sycamore Grove Multi-Purpose Field (generally Master EIR Projects 2.3.1.6.6 and 2.3.1.6.10):** This project will create a new active use sports (soccer) field to the east of the existing Sycamore Grove Field. Given the proposed field's location within the Devil's Gate Dam floodplain, the proposed project will require raising the field elevation approximately 10 to 12 feet higher than the current elevation. The project will also include expanding the existing 100 space parking lot to provide a total of 200 parking spaces and various storm drain improvements to support the project. Lighting for evening sporting events is not proposed and, at this time, it is assumed that the field's playing surface will be artificial turf and that irrigation for a natural turf field will not be required.
2. **Westside Perimeter Trail (generally Master EIR Project 2.3.1.18.1.7):** This project will improve 1,900 linear feet of trail, from the Flint Wash Bridge Trail Crossing to the proposed Sycamore Grove Field for hiking and equestrian use. The project will include a combination of restoring existing and former trail alignments, trail realignment, installing a 40 foot bridge crossing over Berkshire Creek, and raising a portion of the trail 8 to 10 feet in elevation, such that the trail lies above the level of frequent inundation.
3. **Restoration of Berkshire Creek (generally Master EIR Project 2.3.1.9.3):** This project will restore a small canyon and reestablish the Berkshire Creek streamcourse, which has been severely degraded by the high urban storm water flows that occur in this area. The project will improve water quality by eliminating the large volume of trash that empties into this canyon and further into the Hahamongna basin and will also restore habitat.

The proposed Hahamongna Basin Multi-Use Project is also located on the west side of the Hahamongna Watershed Park, west and north of Devil's Gate Dam and consists of the following:

1. **The "Basin Area Component" being undertaken with funding from the Prop. 84 Integrated Regional Water Management Plan (IRWMP) grant program (generally Master EIR Project 2.3.1.9.3):** The proposed Basin Area improvements will involve approximately 7 acres of habitat restoration along the west side of the Hahamongna Basin, generally east of the Westside Perimeter Trail.

The proposed improvement projects require fill material to complete. The City is considering two options for the import of fill. The first option is to utilize sediment that has accumulated in the Hahamongna basin, which the Los Angeles County Department of Public Works plans to excavate. The second option is to import fill material from an offsite source. Our proposed scope of work includes analyzing both of these earth material source options in detail.

Willdan understands that all funding and related granting agency contracts are in place to proceed for the Hahamongna Multi-Benefit Project and that the award of IRWMP funds for the Hahamongna Basin Multi-Use Project was only recently announced, so that a contract with the granting agency for this project will not be finalized until early 2012. While Willdan recommends one CEQA document that evaluates the cumulative impacts from both projects, this proposal provides a separate cost estimate for each. Willdan proposes to prepare a Supplemental EIR pursuant to Section 15179(b)(2)(A)(2) of the State CEQA Guidelines that would analyze the Hahamongna Multi-Benefit Project improvements and the Basin Area components of the Hahamongna Basin Multi-Use Project. In addition to preparing the project's CEQA document, our proposal includes assisting the City in acquiring the necessary regulatory permits for the project, which we anticipate to be a Section 404 permit from the U.S. Army Corps of Engineers, a Streambed Alteration Agreement from the California Department of Fish and Game, and Section 401 Clean Water Certification from the Regional Water Quality Control Board.

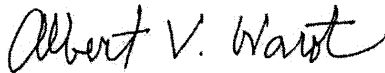
Enclosed with this letter are our proposed scope of services, schedule, and fee. Qualification materials are available upon request. Our work program has been developed to meet the needs of the City from the perspective of examining environmental issues pertinent to the proposed project and complying with

CEQA requirements. However, should the proposed services exceed or fall short of your expectations, we would appreciate the opportunity to meet with you to review your concerns, make the appropriate modifications to the scope of services, and revise the proposed fee accordingly.

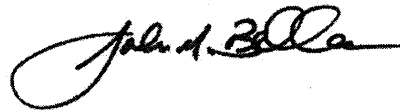
We sincerely appreciate the opportunity to offer our services to the City of Pasadena and stand ready to proceed with the preparation of the required environmental document upon your authorization. If you should have any questions concerning this proposal, please do not hesitate to contact Mr. John Bellas at (562) 908-6298.

Respectfully submitted,

WILLDAN ENGINEERING



Albert V. Warot
Director of Planning



John M. Bellas, LEED AP
Deputy Director of Planning

Enclosures

JB:mh
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**SCOPE OF SERVICES
CITY OF PASADENA
HAHAMONGNA MULTI-BENEFIT PROJECT
ENVIRONMENTAL IMPACT REPORT
AND
ENVIRONMENTAL PERMITTING ASSISTANCE**

Willdan proposes to prepare either a Focused Environmental Impact Report (EIR), pursuant to Sections 15178 and 15179.5 of the State CEQA Guidelines, or a Supplemental (Tiered) EIR for the project. Given the substantial similarities between these two types of CEQA documents, the scope of work outlined below can be applied to either scenario. Our proposed scope of services consists of the following tasks:

- TASK- 1 Project Management and Meetings**
- a. Kick-Off and Coordination Meetings
 - b. Project Management
- TASK- 2 Initial Study, Notice of Preparation, and Scoping**
- a. Initial Study
 - b. Notice of Preparation
 - c. Public Scoping Meetings
- TASK- 3 Technical Studies**
- a. Air Quality and Health Risk Assessment
 - b. Greenhouse Gas Impact Analysis
 - c. Noise and Vibration Impact Assessment
 - d. Traffic Impact Analysis
 - e. Biological Resources Assessment Report
 - f. Jurisdictional Determination and Delineation
 - g. Permitting
 - h. Conceptual Restoration Plan Development
 Cultural Resources Study
- TASK- 4 Draft EIR**
- a. Administrative Draft EIR
 - b. Draft EIR
 - c. Circulation of the Draft EIR and Public Notification
- TASK- 5 Final EIR**
- a. Responses to Comments
 - b. Mitigation Monitoring and Reporting Program
 - c. Revisions to the Draft EIR
 - d. Final EIR
- TASK- 6 Certification Process**
- a. Support the City Attorney's Office in Preparing Findings and Statement of
 Overriding Considerations
 - b. Public Hearings
 - c. Notice of Determination

These tasks are described in detail on the following pages.

TASK 1 – PROJECT MANAGEMENT AND MEETINGS

1(a) – Kick-Off and Coordination Meetings

Willdan's Project Manager and, as appropriate, key personnel will attend a kick-off meeting and coordination meetings with the City. Willdan anticipates attendance at a kick-off meeting and up to three (3) coordination meetings over the course of the project.

Deliverables:

- *16 hours of meeting attendance for Willdan's Project Manager*
- *24 hours of meeting attendance for additional Willdan team members*

1(b) – Project Management

Willdan's assigned Project Manager will work as an extension of City staff. This approach optimizes the communication between the City and the consultant team. Management activities include coordinating with subconsultants, monitoring the project budget and progress, ensuring the proposed timeline is met, coordinating with appropriate City staff, and providing quality control review of all completed work products.

TASK 2 – INITIAL STUDY, NOTICE OF PREPARATION, AND SCOPING

2(a) – Initial Study

Willdan will prepare administrative draft and final versions of an Initial Study to identify and document any aspects of the project that could cause a significant effect on the environment and to focus the scope of the EIR. Aspects of the project determined to result in no impact or less than a significant impact on the environment will be focused out of the EIR. The Initial Study will consider the analysis included in the Arroyo Seco Master Plan Master EIR and, where appropriate, will carry forward the mitigation measures from that document.

Deliverables:

- *The administrative draft Initial Study will be submitted to the City electronically.*
- *Ten (10) copies and one (1) electronic copy of the final Initial Study to the City.*

2(b) – Notice of Preparation

Willdan will prepare a Notice of Preparation (NOP) to file with the State Clearinghouse and the County Clerk, and to mail to adjacent jurisdictions, responsible agencies, and members of the public who have requested notice.

Deliverables:

- *One (1) electronic copy of the NOP to the City.*
- *Filing of one (1) copy of the NOP with the County Clerk.*
- *Fifteen (15) paper copies of the NOP and Initial Study (Task 2[a]) to the State Clearinghouse.*
- *Mailing of up to fifty (50) copies of the NOP.*

2(c) – Public Scoping Meetings

Willdan will conduct two scoping meetings for the proposed project. This task includes preparing PowerPoint presentations, explaining the CEQA process for the proposed project, taking discussion notes, and assisting in response to technical questions. Willdan will also assist the City in preparing notices and flyers for the meeting. Willdan assumes that the City will be responsible for the distribution and/or publication of notices.

Deliverables:

- *Attendance of Willdan's Project Manager and one additional staff member at two Public Scoping Meetings.*

TASK 3 – TECHNICAL STUDIES

3(a) – Air Quality and Health Risk Assessment

Sespe Consulting, Inc. (Sespe) will conduct an air quality and health risk assessment for the project and will prepare draft and final iterations of a corresponding technical report. The air quality and health risk assessment will evaluate both alternatives for fill material for the project (use of material from the Devil's Gate Dam and import of material). Cumulative impact methods used in CEQA require that the assessment(s) consider the sum of the effects of project activities and Los Angeles County Department of Public Works' activities at the adjacent Devil's Gate Dam.

City Guidelines requires the use of the South Coast Air Quality Management District (SCAQMD) CEQA thresholds and SCAQMD recommended methodologies. Sespe will calculate the air pollutant emissions generated during the peak day of the construction and operation phases. Regional air quality impacts are evaluated on the peak day by comparing emissions to SCAQMD Mass Daily Thresholds (MDT).

The Localized Significance Threshold (LST) methodology uses peak day emissions and is recommended by SCAQMD for projects less than five acres in size. This project totals greater than five acres and so SCAQMD would recommend air dispersion modeling using Industrial Source Complex Short Term (ISCST) Model. Sespe will conduct air dispersion modeling for the project. NO₂, PM₁₀ and PM_{2.5} modeling will be performed using SCAQMD approved methods to estimate ambient concentrations during construction. Peak hour and peak year emissions estimates would be prepared for use in the modeling. Modeled concentrations would be compared to the SCAQMD CEQA thresholds to determine significance. Sespe will analyze the results of the air dispersion modeling using the Hotspot Analysis and Reporting Program (HARP) risk module. Acute and chronic non-cancer risks will be evaluated. Cancer risk will not be assessed because the construction phase of the project is of short duration and cancer risk is based upon a lifetime exposure. (No cancer risk is expected from the "operational" phase of the project.)

3(b) – Greenhouse Gas Impact Analysis

Sespe Consulting, Inc. (Sespe) will conduct a greenhouse gas (GHG) impact analysis for the project and will prepare draft and final iterations of a corresponding technical report. The GHG impact analysis will evaluate both alternatives for fill material for the project (use of material from the Devil's Gate Dam and import of material).

GHG emissions impacts will be estimated using the most current available methodology. Combustion of fuels in vehicles during construction and operation phases, electricity use, water use, tree planting, and waste disposal will each be considered in the GHG impact assessment to the extent that activity levels and emissions factors are available. Page 1-2 of the Final Draft Greenhouse Gas Emissions Inventory and Reduction Plan (City of Pasadena, October 2009) contains a goal to "Establish thresholds of significance for GHG emissions within the California Environmental Quality Act (CEQA) thereby creating a legally defensible foundation to use with the environmental analysis of future development projects subject to City review." City thresholds and methodology will be used if they exist when the impact assessment is prepared. Otherwise, current best practices for assigning quantitative significance thresholds for GHG will be reviewed and a threshold recommended/used based upon evidence available at the time and Sespe's professional judgment.

3(c) – Noise and Vibration Impact Assessment

Sespe Consulting, Inc. (Sespe) will conduct a noise and vibration impact assessment for the project and will prepare draft and final iterations of a corresponding technical report. The noise and vibration impact analysis will evaluate both alternatives for fill material for the project (use of material from the Devil's Gate Dam and import of material). Cumulative impact methods used in CEQA require that the assessment considers the sum of the effects of project activities and Los Angeles County Department of Public Works' activities at the adjacent Devil's Gate Dam and Devil's Gate Basin.

Noise and vibration impact assessments will be performed for off-road mobile equipment used during all project construction activities and noise impacts from operation of the Sycamore Grove multi-purpose field and the Westside Perimeter Trail (no long-term noise generation is expected to result from the Berkshire Creek project).

In order to establish existing noise levels, Sespe will conduct at least one 24-hour mid-week measurement at the property line adjacent to the High School and at least one additional measurement along the anticipated fill material haul route. Other noise measurement locations will be determined in consultation with City staff. Traffic will be counted during haul route noise measurement(s).

Construction noise impacts will be estimated using the Caltrans methods which predict 6 decibel reduction per doubling of distance (-6 dB/DD) from a point source and -3 dB/DD from line sources. Noise source information (e.g., sound power, or sound pressure at a reference distance) will be provided by the client, assumed to be the maximum allowed by the Municipal Code (i.e., 85 dB at 100-feet, Section 9.36.080) or determined by Sespe based upon other available documentation for similar sources.

Haul route noise impact from the Off-Site Fill Alternative will be predicted using the Traffic Noise Model (TNM). Noise measurements and traffic counts representative of existing conditions will be used to calibrate the model. The cumulative conditions including haul trucks from the project, haul trucks from the Devil's Gate Basin Post-Station Fire Sediment Removal Project and the existing traffic will be used to predict noise levels for comparison to the thresholds of significance

Ground borne vibration impacts are normally a concern for blasting, pile driving and similar types of activities. For instance, construction of the bridge over Berkshire Creek may involve pile driving. The impact assessment will describe construction activities and predict vibration levels using Caltrans methodologies for comparison to City (if any) or Caltrans significance

thresholds. Vibration impacts on structures from haul trucks traveling on roadways will also be discussed.

3(d) – Traffic Impact Analysis

The City of Pasadena's *Traffic Impact Review, Current Practice and Guidelines* require that a traffic study analyze existing conditions, future pre-project conditions and future with-project conditions. For the Hahamongna Multi-Benefit Project, however, City staff has determined that analysis of future with-project conditions at project completion and at General Plan build-out are not necessary, since the traffic analyses prepared for the Arroyo Seco Master Plan Master EIR and the Hahamongna Annex project considered-build out of the involved park improvements. Accordingly, Willdan Engineering will prepare a traffic impact study (TIS) that will primarily focus on the impact of the potential temporary increase in traffic during project construction, related to the potential import of fill material.

The amount of traffic that will be generated by the project's construction is directly related to Los Angeles County's proposal to remove material from behind the dam. The County is currently proposing to export this fill material to off-site locations. In keeping with the HWP master plan, the City is proposing to use a portion of the fill material that the County is proposing to remove from behind Devil's Gate Dam for the City's four Hahamongna Watershed Park projects. Should this "on-site" fill option come to fruition, construction truck traffic would primarily occur on non-public access/haul routes within the park/basin. Willdan's Traffic Impact Analysis will include an evaluation of this "on-site" option, with the analysis being limited to evaluating impacts on pedestrian, bicycle, and equestrian circulation.

Should the "on-site" fill option not come to fruition, the City would be required to import the necessary fill from off-site sources. To ensure all possible scenarios are evaluated, the Traffic Impact Analysis will also consider this "off-site" fill option. In this option, haul trucks would travel on public streets to deliver fill to the construction site. Therefore, the "off-site" analysis will include an evaluation of traffic impacts on surrounding streets/intersections. Finally, since the County's project would be expected to operate concurrently with the construction phase of the City's project, the impact of the combination of these activities will also be evaluated.

Although the traffic analysis will primarily focus on the project's construction phase, the permanent impacts of the project (Existing With Project Conditions) will also be assessed pursuant to the guidance provided by the CEQA courts in the recent Sunnyvale case. The Existing With Project Conditions analysis will include the permanent increase in traffic generated by the proposed Sycamore Grove multi-purpose field and the proposed Westside Perimeter trail improvements.

3(d).1: Kick-Off Meeting

Initially, a kick-off and scoping meeting will be held via conference call with City staff to finalize the study scope and identify the additional information that will be needed from the City. The discussion about the study scope will include the study limits, study intersections/street segments, and analysis parameters. The additional information needed will include the number of truck trips expected for the "on-site" and "off-site" importation of fill material, the location(s) of the origin of source material, days and times of fill/truck operations, the anticipated duration of the "fill" phase, and the completion/opening year of the park facilities. Following the meeting, the traffic study parameters will be summarized in a scoping agreement for City approval prior to the start of data collection and analysis.

3(d).2: Field Review and Data Collection

A field review will be conducted to familiarize ourselves with existing conditions and to document the project site and study intersections, noting the traffic controls, intersection geometrics, pedestrian/bicycle access and on-site paths, and nearby public transportation. It is expected that the with-project analysis will include a mid-day weekend analysis in addition to the usual weekday analysis. AM and PM peak period weekday traffic counts, mid-day weekend peak period traffic counts, and 24-hour daily weekday and weekend traffic counts will be collected for the study intersections and roadway segments to establish existing conditions. Since traffic volumes have generally been trending down with the economic recession, the traffic counts will be compared with historic counts and adjustments made to represent "normal" conditions. The daily traffic counts for roadway segments expected to be utilized by the project construction truck traffic will be classified by vehicle type, including passenger cars, buses, and various trucks, by number of axles. Any other pertinent available data will be collected from the City or other appropriate agencies. It is assumed that the off-site material source(s) would be outside of the immediate area, and that all "off-site" project construction truck traffic would use the I-210 Freeway to travel to and from the material source(s).

3(d).3: Cumulative Development

Since the traffic study will focus primarily on the project's construction impacts, it is anticipated that cumulative development will only be applied to the two construction alternatives. Cumulative growth in the study area will be estimated using City-identified related projects and a City-approved ambient growth factor. It is expected that Los Angeles County's proposed project to export fill material from behind the Devil's Gate Dam will be one of the related projects, and that needed information such as number of truck trips, their routing and project duration will be provided by the County or other sources. Related projects trip generation will be based on the latest edition of the Institute of Transportation Engineers (ITE) Trip Generation rates or acquired from other sources, such as previous traffic studies. Any other sources used will be documented. Up to 5 related projects will be included in the study.

3(d).4: Project Trip Generation and Assignment

The number of trips expected to be generated by the project will be estimated based upon information provided by the City, the Institute of Transportation Engineers (ITE) Trip Generation, and other relevant sources, such as previous traffic studies. Trip reductions may be appropriate since bicycles and transit are likely to be used to travel to and from the proposed project's park facilities. For a more realistic representation of project construction traffic, project truck trips will be converted to passenger car equivalents using a factor approved by the City.

The project trips will be distributed to the roadway network based on regional land use and circulation system data. Since the "off-site" project construction trips are expected to use the I-210 Freeway in traveling to and from the project site, it is anticipated that their trip distribution will only extend from the project site to the I-210 Freeway, via the Berkshire Place ramps. The estimated project and project construction trips will be assigned to the street system in conformance with the appropriate distribution pattern.

3(d).5: Traffic Impact Analysis

A capacity analysis will be performed to evaluate the ability of the street system to accommodate the projected demands based on the City's thresholds for intersections and street segments. The analysis will be conducted in accordance with the City of Pasadena's *Traffic Impact Review Current Practice & Guidelines*. The Intersection Capacity Utilization (ICU) methodology will be used to analyze signalized intersections and the 2000 Highway Capacity Manual (HCM) methodology will be used for the un-signalized intersections. For the purposes of defining significant impacts, as identified in the City's guidelines, the un-signalized intersections will also be evaluated using the ICU methodology. The City's methodology and thresholds will be used to determine significant impacts to roadway segments.

The peak hour and daily level of service (LOS) analyses will include the following scenarios:

- Existing Conditions (weekday and weekend)
- Existing with Project Conditions (weekday and weekend)
- Pre-Project Construction Conditions (weekday only)
- Project Construction Conditions for Both On-Site and Off-Site Construction Options (weekday only)
- Project Construction Conditions for the On-Site Construction Option with Mitigation Measures (if needed)
- Project Construction Conditions for the Off-Site Construction Option with Mitigation Measures (if needed)

Pre-Project Construction Conditions traffic is the combination of existing traffic and cumulative development traffic (related projects, including the County's Devil's Gate Dam project, and ambient growth). Project construction traffic for each of the two options is added to Pre-Project Construction Conditions traffic to simulate conditions with project construction (Project Construction Conditions).

Up to 5 intersections and 6 roadway segments will be included in the project construction analyses and up to 10 intersections and 21 roadway segments will be included in the with-project analysis. Traffic signal warrant analyses will be performed, if applicable, for the un-signalized intersections, in accordance with the 2010 California Manual on Uniform Traffic Control Devices (CA MUTCD). Appropriate data will be provided for the air quality and noise studies.

Project-related on-site truck circulation for project construction conditions will be reviewed and its impact on pedestrian, bicycle and equestrian park usage will be evaluated. As necessary, project truck traffic combined with Los Angeles County project-related on-site truck circulation will also be considered when evaluating impacts on pedestrian, bicycle and equestrian park usage. Mitigation measures will be recommended, as needed.

It should be noted that the project site is adjacent to the Jet Propulsion Laboratory (JPL) and La Canada High School and access to these facilities is expected to be affected by the project, particularly for project construction "off-site" conditions. The analysis will assess the project's impact on vehicular, pedestrian and bicycle access to these two facilities, identify any concerns, and recommend mitigation measures, as indicated.

3(d).6: Congestion Management Program (CMP) Analysis

An analysis will be performed to determine if the project would have any significant impacts on Los Angeles County's Congestion Management Program (CMP) roadway segments, intersections or freeway segments. The analysis will be conducted in accordance with the 2010 Congestion Management Program of Los Angeles County. Mitigation measures will be recommended, as necessary.

3(d).7: Parking Analysis

The adequacy of the parking to be provided for the proposed project will be evaluated based on the City's parking requirements. It will also be assessed using rates from the Institute of Transportation Engineers Parking Generation. Any parking deficiencies will be identified and mitigation measures recommended.

3(d).8: Collision Analysis

Traffic collision data for the study intersections and roadways will be collected from the City of Pasadena, Caltrans and other appropriate agencies for the most recent available three-year period. The collision data will be analyzed to determine if the collision rates for existing conditions are greater than expected for comparable intersections and roadways. The collision data will also be analyzed with respect to pedestrian and bicycle collisions and the estimated truck traffic for near-term "off-site" conditions. Appropriate improvements will be recommended, as indicated by the results of the analysis.

3(d).9: Report Preparation

A draft traffic study report will be prepared summarizing the study findings and recommendations. All required data and supporting documents and worksheets will be provided in an appendix. The report will be finalized based on comments received from the City. Responses to comments on the draft Environmental Impact Report will be provided for up to 30 comments.

3(e) – Biological Resources Assessment Report

AMEC Earth & Environmental (AMEC) will prepare a Biological Resources Assessment Report for the project. AMEC has conducted multiple biological resource investigations in the Hahamongna area, including biological resources assessments, focused bird surveys, focused herpetology (amphibians and reptiles) studies, focused fish surveys, and protocol surveys for arroyo toad and mountain yellow-legged frog. In addition, AMEC understands that other consulting firms have completed biological studies related to Los Angeles County's Post Station Fire sediment removal project. For the purposes of costing our proposal, we are assuming that no additional special studies will be required for the project. Likewise, the proposal does not include the cost of obtaining any threatened/endangered species permits. If additional studies are required other than what has been proposed below, AMEC will provide a cost estimate for completing those studies.

The proposed Biological Resources Assessment Report includes the following tasks:

3(e).1: Literature Review

Prior to conducting a general biological survey of the site, AMEC will perform a literature review to determine if any sensitive biological resource occurrences have been reported in the project areas. We will review reports being prepared for the sediment removal project, existing reports prepared in the area, previous biological reports prepared for the project (if available), recent aerial photographs, and other pertinent documents from the AMEC library and project files. We will also review the Department of Fish and Game's (CDFG's) California Natural Diversity Database (CNDDDB), California Native Plant Society's (CNPS) Rare and Endangered Vascular Plants of California, and other readily available biological information.

3(e).2: Biological Resources Survey

A general biological field survey will be conducted using methodologies appropriate for the detection of special-status species habitats identified during the literature review as potentially occurring in the project area. We will ground truth recently prepared vegetation maps prepared for the sediment removal project.

Our cost includes two meetings with City staff in the field to discuss the results of our most recent survey and other reports prepared for surrounding projects. Our survey will be conducted using methodologies appropriate for the detection of special-status elements identified as potentially occurring on the project site. Depending on the timing of the field survey, certain elements may be undetectable. However, habitat suitability will be assessed for all special-status elements potentially occurring on the site.

3(e).3: Preparation of Report

AMEC will provide either a consolidated report for all four projects or individual reports for certain project components (a maximum of three reports). The report(s) will also detail any change in condition to the previously prepared biological reports for the project area. Deliverables will also include general habitat maps showing areas of potential biological resources that could be impacted by the projects.

3(f) – Jurisdictional Determination and Delineation

The area contains waterways and potentially wetlands and riparian habitat. These features may be subject to the jurisdiction of the Army Corps of Engineers (ACOE or Corps) and/or the California Department of Fish and Game (CDFG) pursuant to Section 404 of the Clean Water Act and/or Section 1600 et seq. of the CDFG code, respectively. In order to make a jurisdictional determination and delineate potential jurisdictional waters, an AMEC wetland specialist will perform the following tasks:

3(f).1: Review of Background Information

AMEC will review existing literature related to the site including historical topographic maps and aerial photos, National Wetland Inventory Maps, Soil Surveys, etc. in order to determine potential jurisdictional waters. AMEC will review preliminary engineering plans for the project to assess potential impacts to waters in the area.

3(f).2: Field Assessment and Delineation

AMEC wetland specialists will visit the site to collect data in the project area to complete the jurisdictional determination and they will delineate jurisdictional waters using approved state and federal methods. Data will be collected in the field using GPS with sub-meter accuracy for reproducibility and accurate impact assessment.

3(f).3: Report and Impact Assessment

AMEC will produce a Jurisdictional Determination and Delineation Report that defines methods and results of the field assessment. Boundaries of jurisdictional waters will be overlaid onto aerial photographs for identification. Proposed impact areas will be overlaid onto the aerial photograph to identify and quantify impacts. Permitting requirements will be identified based on the results of the report.

3(g) – Permitting

Based on information provided by the City, permits for impacts to jurisdictional waters will be required for the four projects. The permitting scope includes a pre-application meeting with regulatory agency staff to identify specific permitting requirements, impacts, and mitigation needs. The scope also includes using information from that preapplication meeting, and information obtained during the jurisdictional delineation report, to fill out applications, submit to permitting agencies, and follow up with agencies to ensure permit process remains on track.

Initial assessment of permitting requirements includes:

- Section 404 of the Clean Water Act: Projects that require the deposition of fill material into waters of the U.S. require a Section 404 permit from the U.S. Army Corps of Engineers (USACE). Nationwide Permits (NWP) may be used in areas that meet the requirements including limits of impact, avoidance of endangered species, etc. Based on preliminary assessment, the project may fulfill the requirements of a NWP31 for Maintenance of Existing Flood Control Facilities and/or a NWP 27 for Stream and Wetland Restoration Activities.

Additional assessments, however, would be required, based on results of the delineation and impact assessment, and meetings with agency staff, to make a final determination on applicability of any NWP.

Should it be determined that a NWP is not available for use, an Individual Permit (IP) would be required from the USACE, requiring submittal of alternatives analysis, public comment, and review by EPA prior to finalization. The IP process is significantly more intensive and would require an adjustment in cost, if the project cannot be altered or reduced to fulfill NWP requirements.

- Section 401 Water Quality Certification: Projects that require Section 404 permits also require Section 401 Water Quality Certification from the Regional Water Quality Control Board (RWQCB). An application is required as well as a fee based, in this case, on the area of project disturbance. The application fee is not included in this proposal.
- Section 1602 of the State Fish and Game Code: Project activities that substantially alter a water of the State require a Streambed Alteration Agreement (SAA) from the CDFG. A fee

is required based on the cost of the construction phase of the project but is not included in this proposal.

An AMEC Permitting Specialists will produce permit applications, provide them to City for review and approval, submit applications, and follow up with agencies on a monthly basis to ensure the proper permit processing timeline is maintained. This task does not include additional biological resource surveys if required by agencies. If field visits are requested by any of the permitting agencies, AMEC will provide the scope and cost of that field visit for approval prior to scheduling the visit.

The following provides a schedule for permit approval:

- Section 404 of the Clean Water Act: After submittal of notification of a NWP, the USACE has 30 days to determine if it is complete. Per NWP requirements, the USACE then has 45 calendar days to provide a permit or the contractor may begin the project as proposed. This is not the case, however, if there are Section 7 consultation requirements (i.e., potential impacts to listed species or critical habitat), or historic properties.
- Section 401 and SAA: The schedule for processing 401 Certification by the RWQCB and SAA by the CDFG is essentially the same. Upon receipt of applications the agencies have 30 days to determine if the applications are complete. Once the applications are determined to be complete, the agencies have 60 days to supply the permits/agreements.

This schedule is contingent upon the completion of CEQA review prior to submittal of permit/agreement applications. RWQCB and CDFG will not process applications without an approved CEQA document. This task does not include additional biological resource surveys if required by these agencies. If field visits are requested by any of the permitting agencies, AMEC will provide the scope and cost of that field visit for approval prior to scheduling the visit.

3(h) – Conceptual Restoration Plan Development

AMEC will prepare conceptual restoration plans to mitigate the potential habitat impacts of the proposed improvements, which include temporary construction impacts and permanent impacts from the proposed trail footprint, sports field, and other permanent physical elements (e.g., drainage structures). The conceptual restoration plans will be based on the habitat restoration elements of the Hahamongna Watershed Park Master Plan and will be intended to satisfy the ACOE's and CDFG's requirements for replacing acres of impact on jurisdictional waterways and habitat.

3(i) – Cultural Resources Study

McKenna et al. (McKenna) will prepare a cultural resources study for the project. This investigation includes the following tasks:

3(i).1: Archaeological Records Search

McKenna et al. will complete a standard archaeological records search that covers the boundaries of the existing park and a buffer surrounding the park (1/2 mile). Some data can be drawn from previous studies (including those by McKenna et al.), but a project specific compilation will be prepared to address this specific project.

3(i).2: Native American Consultation

McKenna et al. will contact the Native American Heritage Commission in Sacramento and obtain any records they have with respect to human remains, sacred and/or religious resources in the area. McKenna et al. will also contact identified Native American representatives to obtain supplemental data. Communication from the Gabrielino Band of Mission Indians (Martinez August 22, 2011) is on file, but follow-up on some data presented in the correspondence will be necessary. McKenna et al. will also coordinate with Anthony Morales, Chair of the Gabrielino/Tongva of San Gabriel Valley, and incorporate his comments into the discussion.

3(i).3: Historic Land Use History

McKenna et al. will complete a land use history by researching the property through the Los Angeles County Archives, Assessor, and Recorder's offices. McKenna et al. will also research the City of Pasadena records pertaining to the development of the Park and will supplement this data with research at the Huntington Library – specifically referenced by Ms. Martinez.

3(i).4: Field Survey

McKenna et al. will conduct a field survey of the Hahamongna Watershed Park and relocate any resources previously identified or recorded and complete the recordation of any resources identified as a result of the survey. McKenna et al. will document the data needed to complete the required California DPR-523 forms and supplement the survey with detailed field notes and a photographic record.

3(i).5: Analysis and Report Preparation

McKenna et al. will review and analyze the data compiled over the course of these investigations and prepare a technical document compliant with the data requirements of the Office of Historic Preservation and the City of Pasadena, as deemed appropriate. McKenna et al. will include recommendations with respect to the findings and will be available to clarify, amend, or otherwise review comments on the technical document.

TASK 4 – DRAFT EIR

4(a) – Administrative Draft EIR

Willdan will prepare an Administrative Draft EIR for City review. Willdan anticipates the scope of the EIR would be focused to the following environmental topics:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology/Soils
- Greenhouse Gas Emissions
- Hydrology and Water Quality
- Noise
- Transportation and Traffic

In addition to these environmental topics, the EIR will include all the components required by CEQA, including a summary, a project description, and an alternatives analysis in which up to three alternatives (including the No Project Alternative) will be considered. The EIR will be

prepared in accordance with CEQA, the most recent Guidelines for the Implementation of CEQA, applicable CEQA case law, and City guidelines.

Deliverables:

- *The Administrative Draft EIR will be submitted to the City electronically.*

4(b) – Draft EIR

As noted above, upon completion of Task 4(a), Willdan will provide the City with the Administrative Draft EIR for review. In order to save time in the process, Willdan recommends that each reviewer mark-up their copies with their comments and return comments to Willdan's Project Manager. Willdan will tag substantive comments for discussion. Willdan's Project Manager will then meet with staff, as necessary, to discuss comments on the Administrative Draft EIR. Willdan will make all appropriate revisions and submit a pre-press iteration of the Draft EIR to the City for final approval. Upon City approval, Willdan will submit the completed Draft EIR to the City.

Deliverables:

- *Ten (10) printed copies of the Draft EIR to the City.*
- *Electronic iterations of the Draft EIR for posting on the City's website and for future reproduction purposes.*

4(c) – Circulation of the Draft EIR and Public Notification

Once the Draft EIR is completed, Willdan will circulate the document for public review. This task includes submitting a Notice of Completion (NOC), fifteen (15) copies of the document's Executive Summary, and fifteen (15) electronic copies of the Draft EIR to the State Clearinghouse. Willdan will also prepare a Notice of Availability (NOA) of the Draft EIR for the City to publish, distribute, and post with the County Clerk.

Deliverables:

- *NOC and fifteen (15) copies of the Executive Summary Edition of the Draft EIR to the State Clearinghouse. The Executive Summary Edition will consist of the Executive Summary of the Draft EIR bound into a report with a CD-ROM attached to the back cover that includes an electronic version of the document and an electronic version of the appendix.*
- *Filing of one (1) copy of the NOA/NOC with the County Clerk.*
- *Mailing of up to fifty (50) copies of the NOA/NOC.*
- *Electronic iterations of the NOA and NOC for the City to publish and distribute.*

TASK 5 – FINAL SUPPLEMENTAL EIR

5(a) – Responses to Comments

Following completion of the public review period on the Draft EIR, the Willdan team will prepare responses to all environmental-based comments received on the Draft EIR. An administrative version of the response to comments will be submitted to the City for review. As with the Administrative Draft EIR, Willdan's Project Manager may attend a meeting with staff to discuss substantive written comments on the administrative version of the response to comments. Willdan will make all appropriate revisions and submit a pre-press iteration of the response to

comments to the City for final approval. Upon City approval, Willdan will incorporate the response to comments into the Final EIR.

5(b) – Mitigation Monitoring and Reporting Program

Willdan will prepare a Mitigation Monitoring and Reporting Program (MMRP) for the project pursuant to Section 15097 of the CEQA Guidelines. Willdan will submit an administrative version of the MMRP to the City for review and comment. Willdan will make all appropriate revisions and submit a pre-press iteration of the MMRP to the City for final approval. Upon City approval, Willdan will incorporate the MMRP into the Final EIR.

5(c) – Revisions to the Draft EIR

If changes to the text of the EIR arise during the public review of the Draft EIR, Willdan will make the revisions to the Draft EIR in a strike-out/underline format and will summarize the changes in a chapter of the Final EIR. An administrative version of the revisions to the Draft EIR will be submitted to the City for review and comment. Willdan will address all City comments and submit a pre-press iteration of the revisions to the Draft EIR to the City for final approval.

5(d) – Final EIR

Upon approval of all documents, Willdan will submit a Final EIR to be presented at certification hearings. The Final EIR will consist of the summary of the revisions to the Draft Supplemental EIR, responses to comments, and the MMRP.

Deliverables:

- *Administrative draft versions of all components will be submitted to the City electronically.*
- *Ten (10) printed copies of the Final EIR will be submitted to the City.*

TASK 6 – CERTIFICATION PROCESS

6(a) – Support the City Attorney’s Office in Preparing Findings and Statement of Overriding Considerations

Willdan will provide support to the City Attorney’s office in preparing EIR Findings and, if necessary, a Statement of Overriding Considerations (SOC) for the project. Anticipated effort includes providing background information and review of documents for consistency with the EIR.

6(b) – Public Hearings

All key members of the Willdan team will be available to attend public hearings on the project. Willdan anticipates up to four (4) Public Hearings will be held for the project, including meetings of the City Council and meetings of the Hahamongna Watershed Park Advisory Committee. Willdan assumes the EIR Project Manager will be required to attend all Public Hearings and that additional key staff will be required to attend certain meetings.

Deliverables:

- *Sixteen (16) hours of Public Hearing attendance for Willdan’s Project Manager.*

- *Twenty-four (24) hours of Public Hearing attendance for additional Willdan team members.*

6(c) – Notice of Determination

Willdan will prepare a Notice of Determination in accordance with Section 15094 of the State CEQA Guidelines for the City to file with the County Clerk. Willdan recommends the City file the Notice of Determination within five (5) days of certifying the EIR to establish a 30-day Statute of Limitations.

