

DRAFT

**INITIAL STUDY/
MITIGATED NEGATIVE DECLARATION**

Mid Valley Water Facility Project



Los Angeles Department of Water and Power
Environmental Affairs
111 North Hope Street, Room 1044
Los Angeles, California 90012

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CEQA Initial Study and Mitigated Negative Declaration

Mid Valley Water Facility Project

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ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
µg/L	micrograms per liter
AB	Assembly Bill
AFY	acre-feet per year
AQMP	Air Quality Management Plan
BMP	best management practice
CAAQS	California Ambient Air Quality Standards
Cal/EPA	California Environmental Protection Agency
CalEEMod	California Emissions Estimator Model
CALINE4	California LINE Source Dispersion Model
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CHHSL	California Human Health Screening Levels
City	City of Los Angeles
CMP	Congestion Management Program
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNG	compressed natural gas
CNRA	California Natural Resource Agency
CO	carbon monoxide
CO ₂	carbon dioxide
dB	decibel
dBA	A-weighted decibel
DPM	diesel particulate matter
EIR	Environmental Impact Report
EOC	Emergency Operations Center
EPA	U.S. Environmental Protection Agency
FHWA	Federal Highway Administration
g/BHP-hr	grams per brake horsepower-hour
g/l	grams per liter
GHG	greenhouse gas
GWP	global warming potential
HARP2	Hotspots Analysis and Reporting Program Version 2
HCP	Habitat Conservation Plan
HIC	Chronic Hazard Index
HRA	Health Risk Assessment
I	Interstate
ITE	Institute of Transportation Engineers

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Acronym/Abbreviation	Definition
kWh	kilowatt-hours
LADOT	Los Angeles Department of Transportation
LADWP	Los Angeles Department of Water and Power
LAFD	Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAPD	Los Angeles Police Department
LARWQCB	Los Angeles Regional Water Quality Control Board
LASAN	Los Angeles Department of Public Works Bureau of Sanitation
L_{eq}	equivalent continuous sound level
LID	Low Impact Development
LOS	Level of Service
LST	Localized Significance Threshold
mg/kg	milligrams per kilogram
MGD	million gallons per day
MICR	Maximum Individual Cancer Risk
MM	Mitigation Measure
MND	Mitigated Negative Declaration
MT CO ₂ E	metric tons carbon dioxide equivalent
NAAQS	National Ambient Air Quality Standards
NCCP	Natural Community Conservation Plan
NO ₂	nitrogen dioxide
NO _x	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
O ₃	ozone
OEHHA	Office of Environmental Health Hazard Assessment
PCE	Passenger Car Equivalent
PM ₁₀	particulate matter with a diameter less than or equal to 10 microns (coarse particulate matter)
PM _{2.5}	particulate matter with a diameter less than or equal to 2.5 microns (fine particulate matter)
ppm	parts per million
RCNM	Roadway Construction Noise Model
RMP	Risk Management Policy
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SEA	Significant Ecological Area
SFB	San Fernando Basin
SMP	Site Mitigation Plan
SO ₂	sulfur dioxide
SoCalGas	Southern California Gas Company
SO _x	oxides of sulfur
SR	State Route

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Acronym/Abbreviation	Definition
SUSMP	Standard Urban Stormwater Mitigation Plan
SWPPP	Stormwater Pollution Prevention Plan
TAC	toxic air contaminant
TPH	Total Petroleum Hydrocarbons
UWMP	Urban Water Management Plan
V/C	volume-to-capacity
VMT	vehicle miles traveled
VOC	volatile organic compound

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1 INTRODUCTION

1.1 Overview of the Project

The Los Angeles Department of Water and Power (LADWP) proposes to construct a consolidated campus with modern facilities and consolidated operations for the Mid Valley Water Facility (proposed Project). The proposed Project for the new Mid Valley Water Facility Project would be comprised of approximately 235,967 square feet of buildings, 216,000 square feet of aboveground parking, and 180,168 square feet of additional yard/expansion space on an approximately 17.3-acre parcel located at 7600 North Tyrone Avenue in the Van Nuys area of the City of Los Angeles (City). The proposed Project would also involve improvements to Hazeltine Avenue along approximately 323 linear feet of roadway.

1.2 California Environmental Quality Act

The California Environmental Quality Act (CEQA) applies to proposed projects initiated by, funded by, or requiring discretionary approvals from state or local government agencies. The proposed Project constitutes a project as defined by CEQA (California Public Resources Code Section 21000 et seq.). CEQA Guidelines Section 15367 states that a “Lead Agency” is “the public agency which has the principal responsibility for carrying out or approving a project.” Therefore, LADWP is the lead agency responsible for compliance with CEQA for the proposed Project.

As lead agency for the proposed Project, LADWP must complete an environmental review to determine if implementation of the proposed Project would result in significant adverse environmental impacts. To fulfill the purpose of CEQA, an Initial Study has been prepared to assist in making that determination. Based on the nature and scope of the proposed Project and the evaluation contained in the Initial Study environmental checklist (contained herein), LADWP, as the lead agency, concluded that a Mitigated Negative Declaration (MND) is the proper level of environmental documentation for this proposed Project. The Initial Study shows that impacts caused by the proposed Project would be less than significant or significant but mitigable with incorporation of appropriate mitigation measures as defined herein. This conclusion is supported by CEQA Guidelines Section 15070, which states that an MND can be prepared when “(a) the initial study shows that there is not substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or (b) the initial study identifies potentially significant effects, but (1) revisions in the project plans or proposals made by, or agreed to by the applicant, before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur; and (2) there is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.”

1.3 Project Need and Objectives

The existing LADWP water facilities are located throughout the San Fernando Valley. The consolidation of these facilities is proposed to provide a centralized location for all LADWP Water System divisions. Additionally, the existing water facilities are out of date and need to be modernized to respond to a significant natural disaster and to manufacture and deploy large-scale components and equipment while maintaining a detailed overview of the Water System and its operation.

Objectives for the proposed Project are described below:

- Provide mission-critical facilities in a centralized location within the San Fernando Valley so that LADWP can respond to a significant natural disaster by restoring water systems immediately.
- Accommodate for the growth that has occurred within the San Fernando Valley by providing facilities and services in order to expedite response times.
- Consolidate and centralize Valley Water System divisions and operations in order to deploy large-scale components and equipment efficiently.
- Provide modernized, resilient facilities and ample space for groups from areas throughout the San Fernando Valley.
- Design state-of-the-art buildings and a new campus with a functional and efficient workflow.
- Incorporate water and energy conservation and renewable energy components into Project design.
- Provide permanent homes for department groups located throughout the San Fernando Valley within compromised locations.

2 PROJECT DESCRIPTION

2.1 Environmental Setting

Project Site

The proposed Mid Valley Water Facility site is located at 7600 North Tyrone Avenue in the Van Nuys area of the City of Los Angeles, adjacent to the existing LADWP Valley Center site occupied by the Power System. The parcel on which the Project site is primarily located is Assessor's Parcel Number 2215001913 (City of Los Angeles 2016). Figure 2-1, Regional Map, shows the regional location of the Project site. The Project site is approximately 17.3 acres of empty property already owned by LADWP. Access to the site is available from both Tyrone Avenue on the southwest and Hazeltine Avenue on the southeast, as shown in Figure 2-2, Vicinity Map. The closest major roadway to the Project site is Van Nuys Boulevard, located approximately two blocks to the west. The Project site itself, and specific surrounding land uses, are shown in Figure 2-3, Project Site. The proposed Project would also include improvements along approximately 323 linear feet of Hazeltine Avenue, which is a north-south City of Los Angeles roadway to the east of the Project site.

Van Nuys–North Sherman Oaks Community Plan Area

The Project site is located within the greater San Fernando Valley area and more specifically within City of Los Angeles General Plan's Van Nuys–North Sherman Oaks Community Plan area, as shown in Figure 2-4, Van Nuys–North Sherman Oaks Community Plan Area. The Van Nuys–North Sherman Oaks Community Plan Area is located approximately 16 miles northwest of downtown Los Angeles in the southeast quadrant of the San Fernando Valley comprising approximately 3% or 8,221 acres of the land in the City of Los Angeles. The Van Nuys–North Sherman Oaks Plan Area is generally bounded by the Southern Pacific Railroad on the north; the Tujunga Wash Channel on the east; the Ventura Freeway on the south; and Gloria Avenue, Valjean Avenue, and the San Diego Freeway on the west. As such, the Project site is located in the northern-most portion of the Community Plan area.

Surrounding Land Uses

Land uses in the immediate vicinity of the Project site are predominantly light industrial. Located immediately north of the Project Site are railroad tracks utilized by Amtrak, Metrolink, and others. North of the railroad tracks are additional light industrial uses as well as big box retail. West of the Project site is the LADWP Power System Yard, which is accessed via Van Nuys Boulevard to the west. Fronting Van Nuys Boulevard are predominantly retail uses. South of the Project site is a light industrial complex occupied by Time Warner Cable, and further to the south are Covello Street and a residential neighborhood of single-family homes. East of the Project site is a used car sales lot that processes donated vehicles.

Two airports are located within relative close proximity of the Project site. The Bob Hope Burbank Airport is located approximately 4 miles to the east and the Van Nuys Regional Airport is located approximately 2.5 miles to the west. Additionally, at the intersection of Van Nuys Boulevard with the railroad tracks, a new Metrolink station is currently under construction.

General Plan and Zoning Designations

The Project site is located within the M2-1 zone, with a General Plan land use designation of Light Manufacturing. The site is also located within a Los Angeles State Enterprise Zone as well as within Metropolitan Transportation Authority Project and Transit Priority Areas given the site’s proximity to the Van Nuys Metrolink station. Due to the Project site’s proximity to the Bob Hope and Van Nuys Airports, height restrictions are in place for the site. Depending on the specific location within the site, the height limit is 150, 200, or 500 feet above elevation of 790 feet. The average elevation of the site is 770 feet, thereby providing a maximum allowable height of between 170 and 270 feet. However, none of the proposed buildings would exceed 75 feet in height.

2.2 Project Facilities and Operations

The Project site was historically used for agricultural production and in 1965 was developed with a bioscience laboratory facility. The facility consisted of nine buildings, parking areas, facility equipment, and chemical and hazardous materials storage areas on the western and central portions of the Project site. A vacant field containing an abandoned residential dwelling, bunny house, construction equipment, and construction material storage areas were located on the eastern portion of the site. These facilities were all located on the Project site until 2013, when asbestos abatement, lead based paint removal, and building demolition occurred. LADWP purchased the Project site in 2013 with the intent to build a new district yard in order to allow consolidation of various divisions and expansion.

Given that LADWP owns this approximately 17-acre site, and given that a number of the water divisions are dispersed at out-of-date facilities throughout the entire San Fernando Valley, LADWP desires to consolidate all divisions onto one site. The proposed Project would house the following components, as outlined in Table 2-1, Project Components, and shown in Figure 2-5, Project Site Plan. Details for each proposed Project component are provided in the following section.

Table 2-1. Project Components

Building/Area	Square Footage	Component/ Group/Function
Trunk Line	68,280	Water distribution and trunk line construction and maintenance
Meter Shop	29,068	Meter and Services
Main Line	18,819	Water main line maintenance
Emergency Operations Center/Trouble Board	10,819	Emergency Operation Center
Security	826	On-site security
Supply Chain Services	71,363	Warehouse storage
Fleet Services	8,907	Fleet vehicle maintenance
CNG Fueling	0	Fleet vehicle fueling

Source: LADWP 2017.

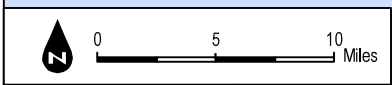


FIGURE 2-1
Regional Map

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Project Site

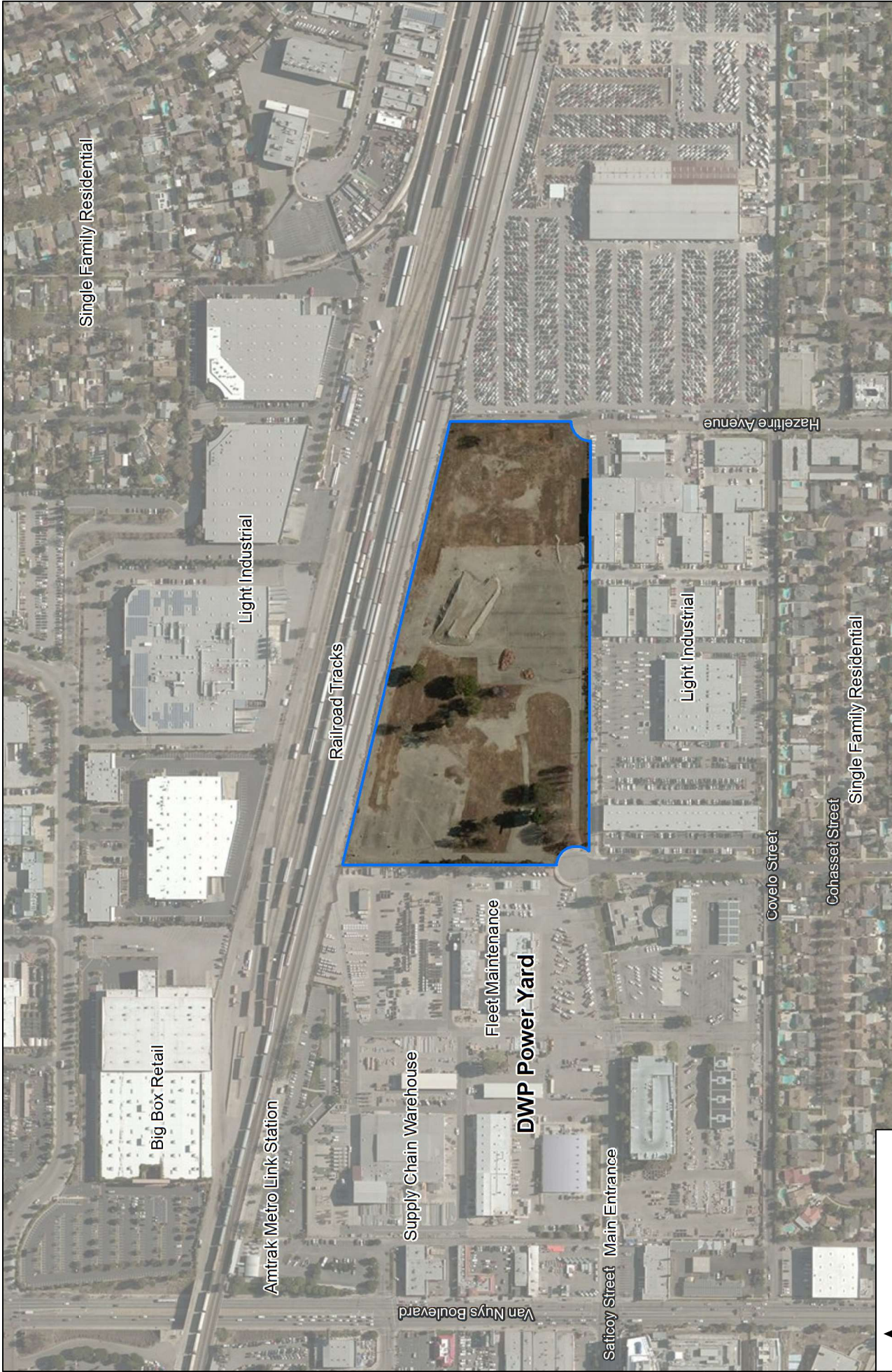
FIGURE 2-2
Vicinity Map


SOURCE: Bing Maps 2016

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 DWP Water Yard (17.3-acres)



SOURCE: Bing Maps 2016

FIGURE 2-3
Project Site

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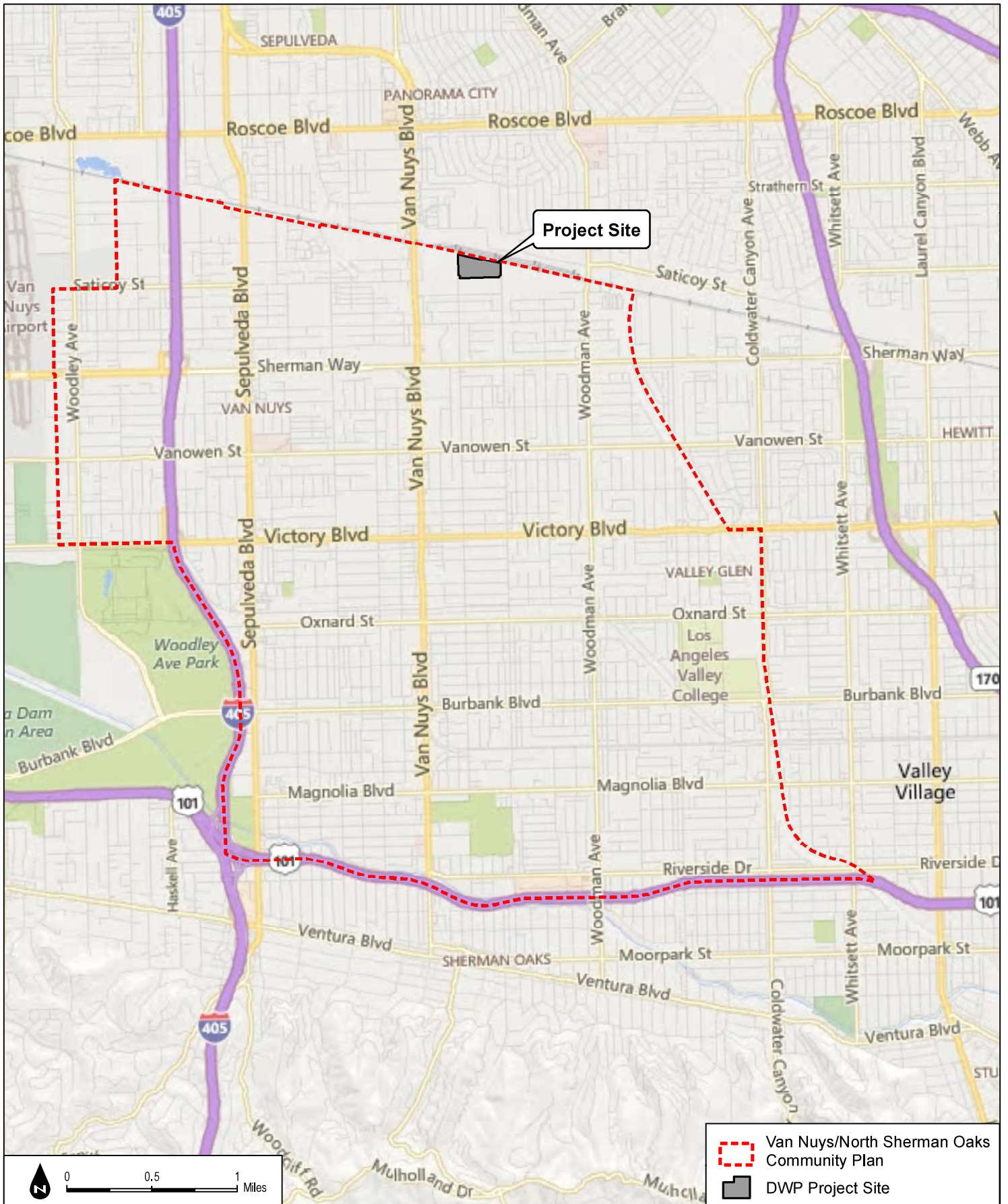
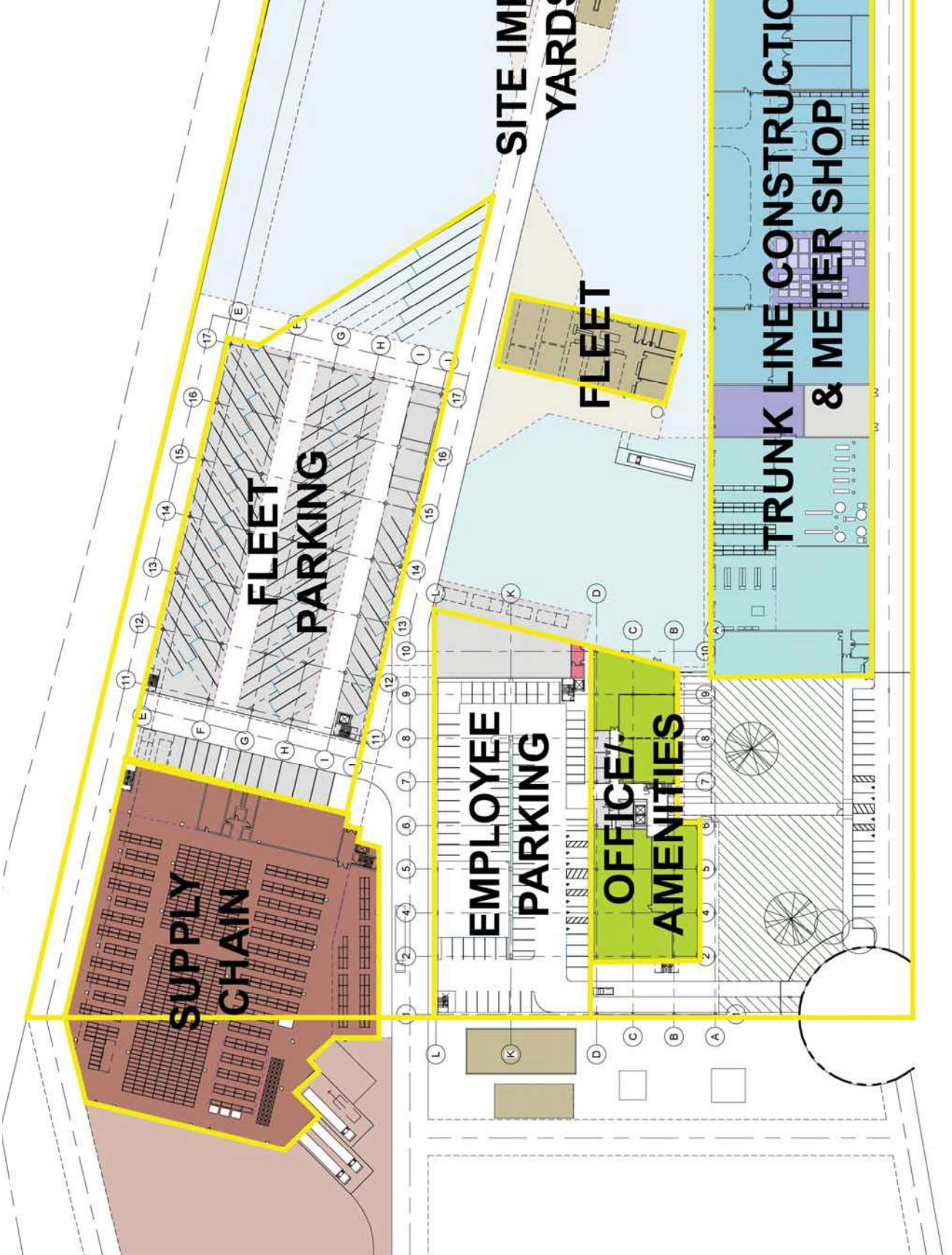


FIGURE 2-4
Van Nuys-North Sherman Oaks Community Plan Area

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Entry/Community Interface

At the terminus of the existing Tyrone Avenue cul-de-sac would be the primary entry point for the public and staff of the Water Yard. Access at this location would be provided via Tyrone Avenue, and upon entering the property, visitors would be directed to park to the right along the southern portion of the property. A total of 20 visitor parking stalls would be provided. Staff entering the site would continue straight along an access driveway that would lead to the aboveground, three-story parking structure with a total of 400 parking stalls.

The main three-story office building, totaling approximately 56,800 square feet, would be located immediately south of the aboveground staff parking structure, and would include a shared-use fitness center, men's and women's locker rooms (totaling 9,082 square feet), conference and training rooms (3,480 square feet), a break room (2,650 square feet), truck line engineering offices (12,079 square feet), a trouble board, an emergency operations center with shared conference rooms (totaling 10,819 square feet), and main line engineering offices (15,106 square feet). A total of 130 employees would be accommodated within this building. Between the office building to the north and the visitor parking to the south of the site would be a community demonstration garden. Access from the employee parking structure would be provided via dedicated pedestrian walkways located both at ground level and along elevated walkways.

Supply Chain Services

The proposed Supply Chain Services warehouse would be located in the northwestern portion of the Project site and actually straddle onto the Power Yard to facilitate the joint function that services both the Power System's and Water System's warehousing needs. The Supply Chain group, currently located at the LADWP Temple Yard Store 1 and Main Street Yard Store 2, is responsible for receiving and storing the majority of bulk deliveries equipment and materials which are unloaded and stored on high capacity racking systems.

Within the approximately 17,363-square-foot Supply Chain warehouse, offices and break rooms would be located on a mezzanine level and the loading docks for the Supply Chain Services would include four depressed large truck bays and two at-grade, smaller truck loading bays. A total of 54 employees would be located within this area of the proposed Project. Access to and from the warehouse would be through the internal roadway network within the Power Yard as well as via the Hazeltine Avenue entrance in the southeastern portion of the Project site.

CNG Fueling Station

The Power Yard currently includes a compressed natural gas (CNG) fueling station which is nearing the end of its service life. As part of the proposed Project, the existing CNG fueling station would be removed from service and a new upgraded CNG fueling station would be constructed on the Power Yard for use by both Power Yard and the future Water Yard fleet. The Water Yard would also have four CNG fueling stations, a truck wash, and spoils storage situated along the primary internal circulation road. The upgraded facility would include four vehicle fueling locations and would be located south of the Supply Chain Services warehouse also straddling the Power Yard and Water Yard.

Fleet Parking

Fleet Parking, which is currently located with department vehicles from East Valley, West Valley and the Rinaldi Yard, would be located in a new three-level, aboveground parking structure located east of the Supply Chain Warehouse and in the northern portion of the Project site. The parking structure would be designed with pull-through parking spaces and a minimum 15-foot grade clearance at grade level. Access to the upper floors would be provided with a relatively flat ramp with less than a ten percent slope. Additionally, electric vehicle charging stations would be located as required within the parking structure. The third, or top, level of the parking structure would be shaded by a canopy constructed of large photovoltaic panels. A total of 220 fleet vehicle parking stalls would be included within the parking structure.

Trunk Line Storage Yard

The northeastern 4.6 acres (202,272 square feet) of the Project site would be utilized as the Trunk Line Exterior Storage Yard for Trunk Line pipes and equipment. Currently the Trunk Line Yard is located at the Rinaldi Yard, which is located adjacent to the Los Angeles Aqueduct Filtration Plant and upon implementation of the proposed Project, all materials and workers would be relocated to this Project site. Yard space is required for storage of both construction materials and equipment, portions of which would be shielded by the perimeter wall along the northern boundary.

Shop and Maintenance Building

Located along the southern portion of the Project site would be an approximately 700-foot-long, 95,277-square-foot building housing shops and maintenance areas for the Meter Shop, Main Line and Trunk Line groups. The following components would be included in this linear building:

- Meter Shop (29,068 square feet) with 51 employees
- Main Line Construction Warehouse (18,819 square feet) with 114 employees
- Building Services (2,423 square feet) with no employees
- Manifold (3,024 square feet) with no employees
- Tool Storage (5,056 square feet) with no employees
- Wets Storage (5,179 square feet) with no employees
- Large Valve Testing facility (18,530 square feet) with no employees
- Coatings area (7,550 square feet) with 8 employees
- Weld Shop (10,450 square feet) with 4 employees

The Meter Shop group, comprised of approximately 51 employees, is responsible for receiving, testing, and calibrating approximately 45,000 meters annually. The existing Meter Shop group would be relocated from the West Valley Yard, which is located at 18718 Raven Street in Northridge.

North of the Meter Shop, located in the most western portion of the building, would be the approximately 34,099-square-foot Meter Shop. The primary function of the Meter Shop would be for receiving, calibrating and testing water meters.

Just to the east of the Meter Yard would be the approximately 8,907-square-foot Fleet Services shared jointly between both the Power Yard and Water Yard. The facility would ultimately provide both minor and major repairs on both fueled and CNG vehicles. A total of nine employees would be stationed within the Fleet Services.

East of the Fleet Services would be the Main Line Yard. The approximately 40,835-square-foot Main Line Yard would be utilized for exterior storage of valves and manifolds. The Main Line group is responsible for engineering design and installation of water supply pipes up to 20 inches in diameter and would be relocated from the West Valley Yard.

Circulation

Access to the Project site would be available in two locations: the western entrance to the Project site would be a Tyrone Avenue and the eastern entrance to the Project site would be via Hazeltine Avenue. Visitors to the site would access the site solely via Tyrone Avenue and would then park in dedicated visitor parking stalls immediately east of the Tyrone Avenue entrance. Employees would access the site during the morning hours via Tyrone Avenue, travel north on internal roadways, and park in the aboveground staff parking structure. Pedestrian access throughout the site would be separated from vehicle traffic via dedicated pedestrian walkways located both at grade and on elevated walkways. Fire and emergency vehicle access would be available along internal roadways circling the site perimeter. Deliveries to the site would be done via either the Power Yard to the west or via Hazeltine to the southeast. All department vehicles would enter and exit the Project site via the eastern Hazeltine Avenue access point. The roadway running through the center of the Project site would be available for use solely for delivery trucks and department vehicles.

Because Hazeltine Avenue would be used for access to the Project site, the City of Los Angeles Bureau of Engineering requires that Hazeltine Avenue be improved per the required street standards as a part of the proposed Project. As part of the proposed Project, a total of 323 linear feet of roadway, beginning at the southeast corner of the Project site and continuing south, would be improved. Improvements would include roadway widening to 36 feet with 23 feet of street and 13 feet of sidewalk. Additionally, a new 55-foot-radius cul-de-sac, similar to the one at the north end of Tyrone Avenue and the Project site, would be constructed. Roadway improvements would also include removing, replacing and repairing any broken cracked or off-grade street curb, gutters, and sidewalks as well as installation of storm drain outlets.

Security

Security would be provided at the site around the clock. The security staff located on site would have one individual stationed in the guard booth at the southeast (Hazeltine Avenue) entrance and one patrolling the site and able to respond to specific calls. Card reader access would be provided for employees to enter and exit at the southwest (Tyrone Avenue) entrance for personal vehicles. The entire perimeter of the Project site would be fenced, and camera surveillance would occur at the site 24 hours a day, 7 days a week. Emergency and fire department access would be provided along both the northern and southern frontages of the Project site via both Tyrone Avenue and Hazeltine Avenue.

2.3 Construction

The Mid Valley Water Facility would be constructed with a progressive design-build method with construction most likely beginning in 2023; however, the construction start date of November 2020 represents the worst-case scenario because equipment and vehicle emission factors for later years would be reduced due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years. The proposed schedule, construction equipment mix, and estimated hours of equipment operation per day used for this analysis is shown in Table 2-2. Table 2-2 also presents the estimated number of worker trips anticipated for each construction sequence.

Table 2-2. Anticipated Construction Scenario

Construction Subphase	Construction Schedule	One-Way Vehicle Trips			Equipment		
		Average Daily Worker Trips	Average Daily Vendor Truck Trips	Total Haul Truck Trips	Equipment Type	Quantity	Usage Hours
Site Preparation	11/1/2020–11/30/2021	18	2	0	Tractors/loaders/backhoes	4	8
					Rubber tired dozers	3	8
Grading	12/1/2020–5/31/2021	16	2	11,118	Excavators	1	8
					Graders	1	8
					Rubber tired dozers	1	8
					Tractors/loaders/backhoes	3	8
Trenching & Underground Utilities	6/1/2021–6/30/2021	10	2	0	Plate compactors	1	8
					Tractors/loaders/backhoes	2	8
					Trenchers	1	8
Perimeter Wall Construction	7/1/2021–7/30/2021	6	4	0	Bore/drill rigs	1	8
					Cement and mortar mixers	1	8
					Concrete/industrial saws	1	8
					Paving equipment	1	8
Paving & Site Infrastructure	8/1/2021–8/31/2021	16	0	0	Pavers	2	8
					Paving equipment	2	8
					Rollers	2	8
Office Building and Staff Parking Structure Construction	9/1/2021–5/31/2022	18	12	0	Cranes	1	4
					Forklifts	2	6
					Tractors/loaders/backhoes	2	8
					Forklifts	2	7
					Generator sets	1	8
					Tractors/loaders/backhoes	1	6
Welders	3	8					

Table 2-2. Anticipated Construction Scenario

Construction Subphase	Construction Schedule	One-Way Vehicle Trips			Equipment		
		Average Daily Worker Trips	Average Daily Vendor Truck Trips	Total Haul Truck Trips	Equipment Type	Quantity	Usage Hours
Water Distribution Shop and Maintenance Building Construction	9/1/2021–7/30/2022	48	24	0	Cranes	1	8
					Forklifts	2	7
					Generator sets	1	8
					Tractors/loaders/backhoes	1	6
					Welders	3	8
Department Fleet Vehicles Parking Structure Construction	9/1/2021–8/31/2022	68	4	0	Cranes	1	8
					Forklifts	2	7
					Generator sets	1	8
					Tractors/loaders/backhoes	1	6
					Welders	3	8
Supply Chain Services Warehouse Construction	9/1/2021–8/31/2022	28	16	0	Cranes	1	6
					Forklifts	1	6
					Generator sets	1	8
					Tractors/loaders/backhoes	1	6
					Welders	3	8
Fleet Maintenance Building and CNG Dispensing Area Construction	9/1/2021–7/30/2022	16	10	0	Cranes	1	4
					Forklifts	2	6
					Tractors/loaders/backhoes	2	8
					Pavers	1	6
					Paving equipment	1	8
					Rollers	1	7
					Tractors/loaders/backhoes	1	8
Architectural Coating	9/1/2022–11/30/2022	44	22	0	Air compressors	1	6
Street Improvement of Hazeltine Ave.	9/1/2022–01/30/2023	16	2	4,000	Excavators	1	8
					Graders	1	8
					Rubber tired dozers	1	8
					Tractors/loaders/backhoes	3	8

Source: LADWP

2.4 Required Permits and Approvals

LADWP is the lead agency for the proposed Project pursuant to CEQA Guidelines Section 15367. The proposed Project would require the following discretionary approvals from LADWP:

- Adoption of this MND by the City of Los Angeles Board of Water and Power Commissioners with a finding that it complies with CEQA.

Approvals from other regulatory agencies may also be required as follows:

- Site Plan Review by the City of Los Angeles Planning Department
- State Water Resources Control Board: LADWP must submit a Notice of Intent and Stormwater Pollution Prevention Plan to the State Water Resources Control Board to comply with the General Construction Activity National Pollutant Discharge Elimination System Permit.
- South Coast Air Quality Management District (SCAQMD) shall issue a:
 - Permit to construct
 - Permit to operate the proposed stationary sources
- Los Angeles Department of Building and Safety shall issue a:
 - Building Permit
 - Disabled Access
 - Grading and Soil Report Approval
- City of Los Angeles Bureau of Engineering shall issue a(n):
 - A Permit
 - B Permit
 - Sewer Connection
- City of Los Angeles Bureau of Sanitation Low Impact Development Ordinance Review and Approval
- City of Los Angeles Department of Cultural Affairs – Design Review
- Los Angeles County Flood Control – Design Review
- City of Los Angeles Department of Transportation Review

2.5 References

City of Los Angeles. 2016. "Zoning Information and Map Access System (ZIMAS)." Accessed March 30, 2016.
<http://zimas.lacity.org/>.

LADWP (Los Angeles Department of Water and Power). 2017. *Feasibility Study Revision B*. September 2017.

INTENTIONALLY LEFT BLANK

3 INITIAL STUDY CHECKLIST

The following discussion of potential environmental effects was completed in accordance with Section 15063(d)(3) of the CEQA Guidelines (2019) to determine if the proposed Project may have a significant effect on the environment.

1. Project title:

Mid Valley Water Facility Project

2. Lead agency name and address:

Los Angeles Department of Water and Power
Environmental Planning and Assessment
111 North Hope Street, Room 1044
Los Angeles, California 90012

3. Contact person and phone number:

Kathryn Laudeman
Environmental Planning and Assessment
Los Angeles Department of Water and Power
213.367.6376

4. Project location:

7600 Tyrone Avenue
Van Nuys, California 91405

5. Project sponsor's name and address:

Los Angeles Department of Water and Power
111 North Hope Street
Los Angeles, California 90012

6. City Council District:

District 2

7. Neighborhood Council District:

Van Nuys Neighborhood Council

8. General plan designation:

Light Manufacturing

9. Zoning:

M2-1

10. Description of Project:

Refer to Section 2 of this MND.

11. Surrounding Land Uses and Setting:

Refer to Section 2.1 of this MND.

12. Responsible/Trustee Agencies:

Refer to Section 2.4 of this MND.

13. Reviewing Agencies:

Refer to Section 2.4 of this MND.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact,” as indicated by the checklists on the following pages.

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology and Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards and Hazardous Materials |
| <input type="checkbox"/> Hydrology and Water Quality | <input type="checkbox"/> Land Use and Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

EVALUATION OF ENVIRONMENTAL IMPACTS

A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the Project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on Project-specific factors as well as general standards (e.g., the Project will not expose sensitive receptors to pollutants, based on a Project-specific screening analysis).

All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an Environmental Impact Report (EIR) is required.

“Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less-Than-Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in a. below, may be cross-referenced).

Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

- a. Earlier Analysis Used. Identify and state where they are available for review.
- b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
- c. Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the Project.

Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

The explanation of each issue should identify:

- a. The significance criteria or threshold, if any, used to evaluate each question; and
- b. The mitigation measure identified, if any, to reduce the impact to less than significant.

3.1 Aesthetics

Except as provided in Public Resources Code Section 21099, would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character and quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) *Would the Project have a substantial adverse effect on a scenic vista?*

No Impact. Scenic vistas generally refer to views of expansive open space areas or other natural features, such as mountains, undeveloped hillsides, large natural water bodies, or coastlines. Less commonly, certain urban settings or features, such as a striking or renowned skyline, may also represent a scenic vista. Under CEQA, scenic vistas also generally, although not exclusively, refer to views that are accessible to broader segments of the public, rather than those available to a limited number of private entities.

The Project site is located within the urbanized area of the Van Nuys area of the City of Los Angeles (City). While the Project site is currently vacant, the site is immediately surrounded by railroad tracks to the north, commercial and industrial uses to the north, east, south, and the LADWP Power System site to the west. The presence of industrial development adjacent to the Project site limits opportunities for particularly scenic vista points in the surrounding area. The City of Los Angeles General Plan, Conservation Element (City of Los Angeles 2001) defines scenic views or vistas as the panoramic public view access to natural features, including

views of the ocean, striking or unusual natural terrain, or unique urban or historic features. Specifically, the Conservation Element identifies the San Gabriel and Santa Susana Mountains, Santa Monica Mountains, Palos Verdes Hills, Pacific Ocean, and the Los Angeles River and its associated tributaries and flood plains as prominent topographic features within the City. Due to the presence of development in the area surrounding the Project site, views of these features are not available. The Van Nuys–North Sherman Oaks Community Plan (City of Los Angeles 1998) does not identify any scenic vistas in the area. Furthermore, similar urban and developed communities and cities containing limited natural scenic resources surround the Van Nuys area. Given these factors, implementation of the proposed Project would not have an impact on scenic vistas.

b) *Would the Project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

No Impact. Within Los Angeles County, only State Route 2 (SR-2; also known as the Angeles Crest Highway) from La Cañada-Flintridge north to the San Bernardino County line is an officially designated state scenic highway (SR-2 is located more than 13 miles east of the Project site) (Caltrans 2011). The closest eligible state scenic highway is Interstate 210 (I-210) from I-15 to near Tunnel Station to SR-134; however, this segment of the highway is located more than 5 miles northeast of the Project site. In addition, the City of Los Angeles General Plan, Conservation Element identifies Sherman Way as a scenic highway, which is 0.5 mile south of the Project site (City of Los Angeles 2001). Due to the presence of intervening development and landscaping, views to the Project site are not available from the eligible state scenic highway segment of I-210 or Sherman Way. Implementation of the Project would have no effect on scenic resources within a scenic highway.

c) *Would the Project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?*

No Impact. The proposed Project site is located in within the City of Los Angeles, in an area that is predominantly light industrial uses. Per the California Public Resources Code Section 21071, the proposed Project site is within an urbanized area. The Project site is located within the M2-1 zone, with a General Plan land use designation of Light Manufacturing. The site is also located within Van Nuys–North Sherman Oaks Community Plan. The proposed Project would consolidate and upgrade LADWP facilities, which would be consistent with the existing zoning and land use designation.

The City of Los Angeles General Plan Conservation Element

The City of Los Angeles General Plan Conservation Element contains a Land Form and Scenic Vistas Policy to encourage development to retain significant existing land forms (e.g., ridgelines, bluffs, unique geologic features) and unique scenic (historic, ocean, mountains, unique natural features) and/or make possible public

view or other access to unique features or scenic views. The Project site currently an empty property containing unkempt landscaping, vacant patches of dirt, ornamental trees, light poles, and bollards. Therefore, no existing land forms exist on site. The area surrounding the Project site generally has an industrial appearance. The site is immediately surrounded by railroad tracks to the north, commercial and industrial uses to the north, east, south, and the LADWP Power System site to the west. The Project site is approximately 5 miles west of the nearest mountains in La Tuna Canyon Park, and 13 miles to the ocean. As such, the Project site does not provide public views of unique features or scenic views. Thus the Project would not conflict with the applicable General Plan polices governing scenic quality.

Los Angeles Municipal Code

The Los Angeles Municipal Code (LAMC) Section 13.04 encourages clustering of development in order to reduce grading and preserve existing natural terrain (City of Los Angeles 2019). LAMC Section 17.50-E restricts density on the basis of the calculated average of the ungraded slopes at selected contours within a parcel that is proposed for divisions of land. The Project would redevelop 17.3 acres of empty property already owned by LADWP within an urbanized area.

Scenic Resource Areas, defined in Section 22.44.1990 of the LAMC, establishes Scenic Resource Areas as areas designated on the Scenic Resources map of the LUP as Scenic Elements, Significant Ridgelines, or Scenic Routes; places on, along, within, or visible from Scenic Routes, public parklands, trails, beaches, or State waters that offer scenic vistas of the mountains, canyons, coastlines, beaches, or other unique natural features; or public parkland and recreation areas identified on the Recreation map of the LUP. The Proposed Project is not designated as or adjacent to a Scenic Element, Significant Ridgeline, or Scenic Route. In addition, the Project site does not provide views from or to the listed natural resource areas. Views of the Project site are further detailed below:

From the north, the site is observable from the railroad tracks and commercial and industrial uses to the north. There are a few ornamental trees along the northern site boundary that would be removed. A 12-foot-high perimeter security wall with razor wire and cameras would be installed along the site's northern boundary. It is expected that the proposed department vehicle parking structure, Supply Chain Services building, and Main Line Yard would not be visible from the industrial uses to the north because the proposed perimeter wall would obstruct the view.

From the east, the site is observable from the used car sales lot to the east. No perimeter wall is proposed for the eastern boundary; therefore, the proposed Main Line Yard and Trunk Line building would be visible from the used car sales lot. However, the Main Line Yard would be visually consistent with the used car sales lot to the east of the Project site. Additionally, the Trunk Line building would also be visually consistent with the light industrial and commercial uses south of the Project site.

From the south, views of the site are available from light industrial and commercial properties to the south. It is expected that the proposed Meter Shop and Trunk Line buildings to be located along the southern Project boundary would be visible from the majority of the commercial and industrial uses to the south. Additionally, an existing multi-story Time Warner Cable building is set back from the Project site by 230 feet; therefore, the proposed buildings may be visible. However, the proposed Trunk Line Construction and Meter Shop building would not substantially degrade the character of the site as the surrounding area already has an industrial appearance, thus would be visually consistent.

From the west, the Project site is visible from the adjacent LADWP Power Yard. Several ornamental trees located along the western border would be removed under the Project; therefore, the proposed Supply Chain Services building, employee parking, office and amenities buildings, and landscaped area would be visible from the LADWP Power Yard. However, these new facilities and buildings would not substantially degrade the character of the site, as the site would have a similar industrial appearance to the existing adjacent LADWP Power Yard.

As such, the Project would not conflict with the applicable LAMC policies governing scenic quality.

Van Nuys–North Sherman Oaks Community Plan

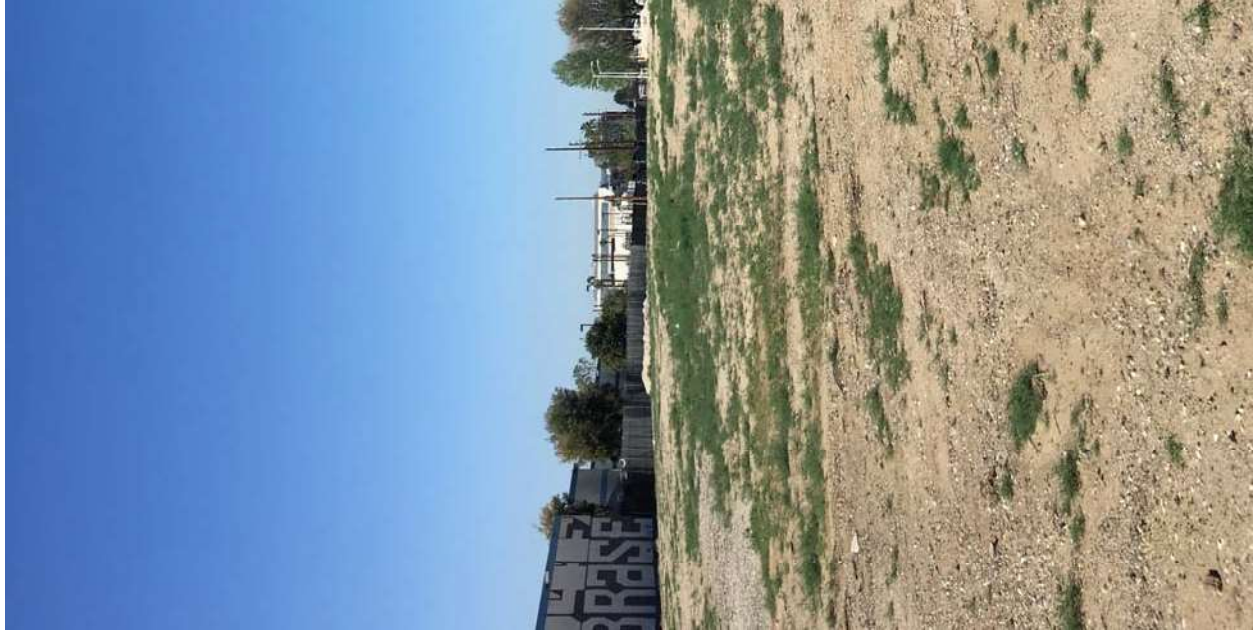
The Van Nuys–North Sherman Oaks Community Plan encourages the retention of visual open space. Within Industrial areas, the following policies apply to buildings and structures:

1. Designing the site and building(s) to convey visual interest and shall be visually compatible with adjacent uses.
2. Treating large expanses of blank walls and tilt-up concrete walls visible from the public right-of-way with contrasting complementary colors, building plane variation, murals, planters and/or other landscape elements to create visual interest.
3. Screening of mechanical and electrical and building appurtenances from public view.
4. Screening of all rooftop equipment and building appurtenances from public view.
5. Requiring the enclosure of trash areas for all projects.
6. Requiring freestanding masonry walls in a front yard to be a minimum of 3.5 feet and decorative, or walls in a side or rear yard to be a minimum of 5' 9" and decorative with a landscaped setback of 5 feet.

The Project site is surrounded by railroad tracks to the north, commercial and industrial uses to the north, east, south, and the LADWP Power System yard to the west. The only public roadway adjacent to the Project site is the segment of Tyron Avenue that dead-ends along the southern boundary. From there, it is expected that the proposed Trunk Line Construction and Meter Shop building located along the southern Project boundary would be visible from the majority of the commercial and industrial uses to the south. However, the proposed Trunk

Line Construction and Meter Shop building would not substantially degrade the character of the site as the surrounding area already has an industrial appearance, thus would be visually consistent. Given the area surrounding the Project site generally has an industrial appearance (see Figure 3-1, Existing Site Photos A and B, and Figure 3-2, Existing Site Photos C and D), the proposed Project would not conflict with the applicable Nuisance–North Sherman Oaks Community Plan policies governing scenic quality.

LEFT: Photo A - Facing North towards Railroad



INITIAL STUDY/MITIGATED NEGATIVE DECLARATION
MID VALLEY WATER FACILITY PROJECT



LEFT: Photo C - - Facing Southeast towards Industrial Uses

RIGHT: Photo D - - Facing West towards ADWP Power Yard

INITIAL STUDY/MITIGATED NEGATIVE DECLARATION
MID VALLEY WATER FACILITY PROJECT

In summary, while portions of the proposed perimeter wall would be visible from surrounding industrial and commercial land uses, the proposed perimeter wall would be consistent with the existing appearance of adjacent uses surrounding the Project site and consistent with the applicable policies governing scenic quality. For these reasons, no impact would occur.

d) *Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

Less-Than-Significant Impact. The Project would require nighttime lighting for safety and security. Exterior lighting circuits would be controlled by photocells. Dusk to dawn circuits would be photocell controlled and would include life-safety egress lighting, security, and all-night lighting. Where exterior lighting is required for personnel and facility security, emergency power backup would be provided. Exterior lighting is expected to be minimal; however, perimeter walls are proposed for the northern and southern Project boundaries and would therefore partially obstruct night-time lighting.

The proposed equipment would consist of a variety of building materials ranging from non-reflective surfaces to surfaces that may result in a limited source of glare (i.e., glass, copper anodized corrugated metal panels, steel). However, the entire perimeter of the Project site would be fenced, which would help diffuse any intermittent or transient reflections or glare. Furthermore, the used car lot to the east would have limited views of the proposed buildings as the laydown yard would be located along the eastern edge of the Project site and would create a buffer between the proposed buildings and the used car lot. As such, both lighting and glare impacts from the Project would be less than significant.

References

- Caltrans (California Department of Transportation). 2011. "California Scenic Highway Mapping System." Accessed January 2019. http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm.
- City of Los Angeles. 1998. Van Nuys–North Sherman Oaks Community Plan. Adopted September 9, 1998. <http://cityplanning.lacity.org/complan/pdf/vnycptxt.pdf>.
- City of Los Angeles. 2001. "Conservation Element." In *The City of Los Angeles General Plan*. Adopted September 26, 2001. <http://planning.lacity.org/cwd/gnlpln/consvelt.pdf>.
- City of Los Angeles. (2019). Official City of Los Angeles Municipal Code, Sixth Edition. Current through Amendments Adopted as of March 31, 2019. Accessed June 7, 2019. [http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:losangeles_ca_mc](http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode?f=templates$fn=default.htm$3.0$vid=amlegal:losangeles_ca_mc).

3.2 Agriculture and Forestry Resources

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) ***Would the Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?***

No Impact. The Project site located within the urban setting of the Van Nuys area of the City. The site is currently a vacant dirt lot with a few stands of trees and parking lot light poles. Although the Project site is outside of the survey boundary area of the California Department of Conservation’s Farmland Mapping and Monitoring Program (CDOC 2016), the developed, urban character of the surrounding area suggest that the appropriate Farmland Mapping and Monitoring Program mapping designation would be “Urban and Built-Up Land.” Therefore, development of the Project site as proposed would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. No impacts would occur, and no mitigation is required.

b) *Would the Project conflict with existing zoning for agricultural use, or a Williamson Act contract?*

No Impact. The Williamson Act, also known as the California Land Conversion Act of 1969 (California Government Code Section 51200 et seq.), preserves agricultural and open space lands from the conversion to urban land uses by establishing a contract between local governments and private landowners to voluntarily restrict their land holdings to agricultural or open space use. The Project site is not located on any lands with Williamson Act contracts. The Project site is currently designated as a Light Industrial Zone (M2-1) and does not support agricultural uses (City of Los Angeles 2017). As such, development of the Project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impacts would occur, and no mitigation is required.

c) *Would the Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?*

No Impact. The Project site is currently designated as a Light Industrial Zone (M2-1). The Project site does not support agriculture or timberland use, and does not support forest land. Therefore, development of the Project site as proposed would not conflict with existing zoning for, or cause rezoning of, forest land, timberland or timberland zoned Timberland Production. No impact would occur, and no mitigation is required.

e) *Would the Project result in the loss of forest land or conversion of forest land to non-forest use?*

No Impact. As discussed in Section 3.2(c), the Project site does not support agriculture or timberland use, and does not support forest land. Therefore, development of the Project site as proposed would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

f) *Would the Project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?*

No Impact. As discussed in Sections 3.2(a) through 3.2(d), the site is developed and does not currently support farmland or forest land. Therefore, development of the Project site as proposed would not result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. No impact would occur.

References

California Government Code, Sections 51200–51297. California Land Conservation Act of 1969.

CDOC (California Department of Conservation). 2016. “Los Angeles County Important Farmland 2014.” April 2016. <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2014/los14.pdf>

City of Los Angeles. 2017. ZIMAS – City of Los Angeles Zoning Property Information. Accessed January 2019. <http://zimas.lacity.org/>.

3.3 Air Quality

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The analysis in this section is partially based on the May 2019 Health Risk Assessment (HRA) prepared for this Project and included in Appendix A. Appendix A also includes the California Emissions Estimator Model (CalEEMod) output with criteria air pollutant emissions estimates, and the California LINE Source Dispersion Model (CALINE4) Carbon Monoxide (CO) Hotspot modeling output.

a) *Would the Project conflict with or obstruct implementation of the applicable air quality plan?*

Less-Than-Significant Impact. The Project is located within the South Coast Air Basin (SCAB), which is a 6,745-square-mile area bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. It includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. The proposed Project is within the jurisdictional boundaries of the South Coast Air Quality Management District (SCAQMD).

The SCAQMD administers the Air Quality Management Plan (AQMP) for the SCAB, which is a comprehensive document outlining an air pollution control program for attaining all National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS). The SCAQMD implements control measures included in the AQMP as regulations to control or reduce criteria pollutant emissions from stationary sources or equipment. On March 3, 2017, the SCAQMD approved the 2016 AQMP, which includes strategies to meet the NAAQS for the 8-hour O₃ standard by 2032, the annual PM_{2.5} standard by 2021–2025, the 1-hour O₃ standard by 2023, and the 24-hour PM_{2.5} standard by 2019. In its role as the local

air quality regulatory agency, SCAQMD also provides guidance on how environmental analyses should be prepared. This includes recommended thresholds of significance for evaluating air quality impacts. The 2016 AQMP is a regional blueprint for achieving air quality standards and healthful air. The 2016 AQMP represents a new approach, focusing on available, proven, and cost-effective alternatives to traditional strategies while seeking to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gas (GHG) emissions and toxic risk, as well as efficiencies in energy use, transportation, and goods movement (SCAQMD 2017). Because mobile sources are the principal contributor to the SCAB's air quality challenges, the SCAQMD has been and will continue to be closely engaged with the California Air Resources Board (CARB) and the U.S. Environmental Protection Agency (EPA), who have primary responsibility for these sources. The 2016 AQMP recognizes the critical importance of working with other agencies to develop funding and other incentives that encourage the accelerated transition of vehicles, buildings, and industrial facilities to cleaner technologies in a manner that benefits not only air quality but also local businesses and the regional economy.

On April 7, 2016, the Southern California Association of Governments (SCAG) Regional Council adopted the *2016–2040 Regional Transportation Plan/Sustainable Communities Strategy: A Plan for Mobility, Accessibility, Sustainability, and High Quality of Life* (2016–2040 RTP/SCS). The 2016–2040 RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals (SCAG 2016a). The SCAQMD 2016 AQMP applies the updated SCAG growth forecasts assumed in the 2016–2040 RTP/SCS.

The SCAQMD has established criteria for determining consistency with the 2016 AQMP in Chapter 12, Sections 12.2 and 12.3, of the SCAQMD *CEQA Air Quality Handbook* (CEQA Handbook). The criteria are as follows:

- **Consistency Criterion No. 1:** The proposed Project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards of the interim emissions reductions specified in the AQMP.
- **Consistency Criterion No. 2:** The proposed Project will not exceed the assumptions in the AQMP or increments based on the year of Project buildout and phase (SCAQMD 1993).

Consistency Criterion No. 1

Section 3.3(b) evaluates the Project's potential impacts in regard to CEQA Guidelines, Appendix G, Threshold 2 (the Project's potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation impact analysis). As discussed in the following text, the Project would not result in a significant and unavoidable impact associated with the violation of an air quality standard upon implementation of Mitigation Measure (MM) MM-AQ-1. Because the Project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, the proposed Project would not conflict with Consistency Criterion No. 1 of the CEQA Handbook (SCAQMD 1993).

Consistency Criterion No. 2

While striving to achieve the NAAQS for ozone (O₃) and particulate matter with an aerodynamic diameter less than or equal to 2.5 microns (PM_{2.5}; fine particulate matter) and the CAAQS for O₃, and particulate matter with a diameter less than or equal to 10 microns (PM₁₀; coarse particulate matter), and PM_{2.5} through a variety of air quality control measures, the Final 2012 AQMP also accommodates planned growth in the SCAB (SCAQMD 2013). Projects are considered consistent with, and would not conflict with or obstruct implementation of, the AQMP if the growth in socioeconomic factors (e.g., population, employment) is consistent with the underlying regional plans used to develop the AQMP (per Consistency Criterion No. 2 of the SCAQMD CEQA Handbook).

The SCAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) developed by the SCAG for its RTP/SCS (SCAG 2016b), which is based on general plans for cities and counties in the SCAB, for the development of the AQMP emissions inventory (SCAQMD 2017).¹ The SCAG 2016 RTP/SCS, and associated Regional Growth Forecast, are generally consistent with the local plans; therefore, the 2016 AQMP is generally consistent with local government plans. If a proposed project involves development that is greater than that anticipated in the General Plan and SCAG's growth projections, the proposed Project might conflict with the AQMP and may contribute to a potentially significant cumulative impact on air quality.

In 2026, upon buildout of the Project, it is anticipated that 416 employees would be employed at the Water Facility. Although the Project would involve the consolidation of existing LADWP water facilities and would be staffed by employees from the existing water facilities, the Project would involve an increase in employees to accommodate the new Water Facility. This analysis is a worst-case scenario, in which it is assumed that all 416 employees are new.

As part of the 2016–2040 RTP/SCS, SCAG has prepared population and employee projections for the region as part of the 2016–2040 RTP/SCS. Table 3-1 shows the employee projections from the 2016–2040 RTP/SCS for the City.

The majority of Trunk Line employees are field crew and work directly at field operations sites throughout the San Fernando Valley. Although employees traveling to and from the Project are expected to come from multiple cities throughout the San Fernando Valley, the existing and future LADWP employee distribution data is not available. Therefore, it was conservatively assumed that all future employees would come from the City.

¹ Information necessary to produce the emission inventory for the SCAB is obtained from the SCAQMD and other governmental agencies, including CARB, Caltrans, and SCAG. Each of these agencies is responsible for collecting data (e.g., industry growth factors, socio-economic projections, travel activity levels, emission factors, emission speciation profile, and emissions) and developing methodologies (e.g., model and demographic forecast improvements) required to generate a comprehensive emissions inventory. SCAG incorporates these data into their Travel Demand Model for estimating/projecting vehicle miles traveled and driving speeds. SCAG's socio-economic and transportation activities projections in their 2016 RTP/SCS are integrated in the 2016 AQMP (SCAQMD 2017).

Table 3-1. Employment Growth for the City of Los Angeles

SCAG 2016 RTP/SCS Employee Projections		
	2012	2040
Employment	1,696,400	2,169,100

Sources: SCAG 2016.

The Project would employ 416 workers, and it is conservatively assumed that the Project would introduce 416 new employees to Van Nuys, in the City of Los Angeles, although the Project would primarily employ existing LADWP workers from the sites being consolidated as part of the Project. This increase is only 0.10% of SCAG’s 2016–2040 RTP/SCS overall growth of 472,700 employees for the City from 2012 to 2040.

Therefore, the Project would be consistent at a regional level with the underlying growth forecasts in the AQMP. Accordingly, the proposed Project would meet Consistency Criterion No. 2 of the SCAQMD CEQA Air Quality Handbook. Therefore, implementation of the proposed Project would not result in a conflict with, or obstruct implementation of, the applicable air quality plan (i.e., the 2016 AQMP).

Summary

As described previously, the proposed Project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, and would not conflict with Consistency Criterion No. 1. Implementation of the proposed Project would not exceed the demographic growth forecasts in the SCAG 2016 RTP/SCS; therefore, the proposed Project would also be consistent with the SCAQMD 2016 AQMP, which based future emission estimates on the SCAG 2016 RTP/SCS. Thus, the proposed Project would not conflict with Consistency Criterion No. 2. Based on these considerations, impacts related to the proposed Project’s potential to conflict with or obstruct implementation of the applicable air quality plan would be less than significant.

- b) ***Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?***

Less Than Significant with Mitigation Incorporated. A quantitative analysis was conducted to determine whether construction and operation of the Project would result in emissions of criteria air pollutants from mobile, area, and energy sources that may cause exceedances of the NAAQS or CAAQS or contribute to existing nonattainment of ambient air quality standards. The following discussion identifies potential short- and long-term impacts that would result from implementation of the Project.

SCAB Attainment Designation. An area is designated as in attainment when it is in compliance with the NAAQS and/or the CAAQS. These standards are set by the EPA or CARB, respectively, for the maximum level of a given air pollutant that can exist in the outdoor air without unacceptable effects on human health or the public

welfare. The criteria pollutants of primary concern that are considered in this air quality assessment include O₃, nitrogen dioxide (NO₂), CO, sulfur dioxide (SO₂), PM₁₀, and PM_{2.5}. Although there are no ambient standards for volatile organic compounds (VOCs) or oxides of nitrogen (NO_x), they are important as precursors to O₃.

The SCAB is designated as a nonattainment area for federal and state O₃ standards and federal and state PM_{2.5} standards. The SCAB is designated as a nonattainment area for state PM₁₀ standards; however, it is designated as an attainment area for federal PM₁₀ standards. The SCAB is designated as an attainment area for federal and state CO standards, federal and state NO₂ standards, and federal and state SO₂ standards. While the SCAB has been designated as nonattainment for the federal rolling 3-month average lead standard, it is designated attainment for the state lead standard (EPA 2018a).

SCAQMD Thresholds. Construction and operation of the proposed Project would result in emissions of criteria air pollutants for which CARB and the EPA have adopted ambient air quality standards (i.e., the NAAQS and CAAQS). Projects that emit these pollutants have the potential to cause or contribute to violations of these standards. The SCAQMD has adopted significance thresholds, which, if exceeded, would indicate the potential to contribute to violations of the NAAQS or the CAAQS. The relevant SCAQMD thresholds are shown in Table 3-2.

A project would result in a substantial contribution to an existing air quality violation of the federal or state standards for O₃, which is a nonattainment pollutant, if the proposed Project’s construction or operational emissions would exceed the SCAQMD VOC or NO_x thresholds shown in Table 3-2. These emission-based thresholds for O₃ precursors are intended to serve as a surrogate for an “ozone significance threshold” (i.e., the potential for adverse O₃ impacts to occur) because O₃ itself is not emitted directly, and the effects of an individual project’s emissions of O₃ precursors (VOC and NO_x) on O₃ levels in ambient air cannot be determined through air quality models or other quantitative methods.

Table 3-2. SCAQMD Air Quality Significance Thresholds

Criteria Pollutants Mass Daily Thresholds		
Pollutant	Construction (pounds per day)	Operation (pounds per day)
VOCs	75	55
NO _x	100	55
CO	550	550
SO _x	150	150
PM ₁₀	150	150
PM _{2.5}	55	55
Pb ^a	3	3

Table 3-2. SCAQMD Air Quality Significance Thresholds

Toxic Air Contaminants and Odor Thresholds	
Toxic Air Contaminants ^b	Maximum incremental cancer risk \geq 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas \geq 1 in 1 million) Chronic and acute hazard index \geq 1.0 (project increment)
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402
Ambient Air Quality Standards for Criteria Pollutants^c	
NO ₂ 1-hour Average NO ₂ Annual Arithmetic Mean	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.030 ppm (state) and 0.0534 ppm (federal)
CO 1-hour Average CO 8-hour Average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)
Ambient Air Quality Standards for Criteria Pollutants^c	
PM ₁₀ 24-hour Average	10.4 $\mu\text{g}/\text{m}^3$ (construction) ^d 2.5 $\mu\text{g}/\text{m}^3$ (operation)
PM ₁₀ Annual Average	1.0 $\mu\text{g}/\text{m}^3$
PM _{2.5} 24-hour Average	10.4 $\mu\text{g}/\text{m}^3$ (construction) ^d 2.5 $\mu\text{g}/\text{m}^3$ (operation)

Source: SCAQMD 2015a.

Notes: VOC = volatile organic compound; lb/day = pounds per day; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter; Pb = lead; NO₂ = nitrogen dioxide; ppm = parts per million; $\mu\text{g}/\text{m}^3$ = micrograms per cubic meter.

GHG thresholds for industrial projects, as added in the March 2015 revision to the SCAQMD Air Quality Significance Thresholds, were not included in Table 3-2, as they will be addressed in Section 3.8, Greenhouse Gas Emissions.

- ^a The phaseout of leaded gasoline started in 1976. Since gasoline no longer contains lead, the proposed Project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.
- ^b Toxic air contaminants include carcinogens and noncarcinogens.
- ^c Ambient air quality standards for criteria pollutants based on SCAQMD Rule 1303, Table A-2, unless otherwise stated.
- ^d Ambient air quality threshold based on SCAQMD Rule 403.

Construction Emissions. Construction of the proposed Project would result in the temporary addition of pollutants to the local airshed caused by on-site sources (i.e., off-road construction equipment, soil disturbance, and VOC off-gassing) and off-site sources (i.e., on-road haul trucks, vendor trucks, and worker vehicle trips). Construction emissions can vary substantially from day to day, depending on the level of activity and the specific type of operation, and for dust, the prevailing weather conditions. Therefore, such emission levels can only be approximately estimated, with a corresponding uncertainty in precise ambient air quality impacts.

Emissions from the construction phase of the proposed Project were estimated using CalEEMod, Version 2016.3.2. The construction schedule and scenario used for the criteria air pollutant emissions modeling of

the Project are shown in Section 2.3, Construction. For this analysis, it was assumed that heavy construction equipment would operate 5 days a week (22 days per month) during Project construction. Table 2-2, Anticipated Construction Scenario, presents the estimated number of workers anticipated for each construction sequence. To estimate motor vehicle emissions generated by worker vehicles (i.e., light-duty trucks and automobiles), it was assumed that each worker would generate two one-way trips per day. In addition to construction equipment operation and worker trips, emissions from hauling trucks and vendor trucks were estimated. The number of daily worker trips were based on CalEEMod default values for the site preparation, grading, trenching, and paving phases. During the site preparation, grading, and trenching phases, vendor trip estimates were modified to reflect two water truck trips per day. During the construction and architectural coating phases, CalEEMod default values were revised for worker and vendor trips.²

Phase 1 grading would require the import of 88,944 cubic yards of soil and export of 88,944 cubic yards of soil. This would require 11,118 one-way haul trips. The CalEEMod default for grading phase length is 20 days for a site that is greater than 5 acres (but less than 10 acres). Because grading would require the import and export of 177,888 cubic yards of soil, it would not be possible to finish grading in 20 days. Assuming that 43 truckloads could be processed on the site within a day, the default grading phase length was changed to 130 days. All trip distances were based on the CalEEMod defaults.

Implementation of the Project would generate construction-related air pollutant emissions from entrained dust, equipment and vehicle exhaust emissions, and architectural coatings. Entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in coarse PM₁₀ and PM_{2.5} emissions. The Project would be required to comply with SCAQMD Rule 403 to control dust emissions generated during construction activities (SCAQMD 2005). Standard construction practices required under Rule 403 would be employed to reduce fugitive dust emissions, including watering of the active sites approximately three times daily depending on weather conditions. Internal combustion engines used by construction equipment and on-road vehicles would result in emissions of VOCs, NO_x, CO, PM₁₀, PM_{2.5}, and minimal emissions of sulfur oxides (SO_x). The application of architectural coatings, such as exterior application/interior paint and other finishes, would also produce VOC emissions, and the Project shall comply with SCAQMD Rule 1113, which proscribes the sale or application of high-VOC-content architectural coatings. Details of the construction emission assumptions and calculations are included in Appendix A.

Table 3-3 shows the estimated maximum daily construction emissions associated with the construction of the Project.

² CalEEMod calculates worker and vendor trips by multiplying a factor to the total building area (in thousands of square feet) anticipated as part of a project. However, since the proposed Project would separate construction into multiple phases, the worker and vendor trips were hand calculated to avoid overestimating these trips.

Table 3-3. Estimated Maximum Daily Construction Emissions – Unmitigated

Year	VOCs	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	Pounds per Day					
2020	5.27	75.07	37.46	0.13	11.59	5.95
2021	11.53	91.96	92.01	0.17	6.92	4.94
2022	72.11	83.67	90.35	0.17	6.25	4.31
2023	3.16	34.60	27.83	0.08	4.16	1.93
<i>Maximum</i>	<i>72.11</i>	<i>91.96</i>	<i>92.01</i>	<i>0.17</i>	<i>11.59</i>	<i>5.95</i>
<i>SCAQMD Pollutant Threshold</i>	<i>75</i>	<i>100</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
Threshold Exceeded?	No	No	No	No	No	No

Source: See Appendix A for complete results.

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter.

These emissions reflect CalEEMod “mitigated” output, which accounts for compliance with SCAQMD Rule 403 (Fugitive Dust). As shown in Table 3-3, maximum daily construction emissions would not exceed the SCAQMD construction thresholds for VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}. Furthermore, construction-generated emissions would be temporary and would not represent a long-term source of criteria air pollutant emissions. As such, the proposed Project would result in a less-than-significant impact during construction.

Operational Emissions. Operation of the Project would produce VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5} emissions from stationary sources, area sources, including natural gas combustion and use of consumer products, and mobile sources (motor vehicle trips to and from the proposed Project). The proposed Project would primarily affect air quality through vehicular traffic generated by LADWP employees. Emissions of criteria air pollutants were estimated using CalEEMod. Project buildout was assumed to occur in 2026.

The Mid Valley Water Facility would include several different land use types, considering the proposed Project involves the consolidation of existing LADWP facilities. Table 3-4 shows the Project component and the assumed corresponding land use type in CalEEMod.

Table 3-4. Mid Valley Water Facility Component and Corresponding CalEEMod Land Use Type

Mid Valley Water Facility Component	CalEEMod Land Use Type
Water Distribution (Trunk Line Construction)	General Light Industry
Water Distribution (Main Line Construction)	General Light Industry
Water Distribution (Meter Shop)	General Light Industry
Water Distribution (Security)	General Office Building
Water Distribution (Entry/Community Interface)	General Office Building
Water Distribution (Emergency Operations Center and Trouble Board)	General Office Building
Building Services	General Office Building

Table 3-4. Mid Valley Water Facility Component and Corresponding CalEEMod Land Use Type

Mid Valley Water Facility Component	CalEEMod Land Use Type
Coatings Area	General Light Industry
Large Valve Testing Area	Research & Development
Supply Chain Services Warehouse	Unrefrigerated Warehouse-No Rail
Fleet Maintenance Building	Automobile Care Center
Aboveground Parking Structure	Enclosed Parking Structure
Laydown Area	Other Asphalt Surfaces
Roadway	Other Asphalt Surfaces

Source: See Appendix A for complete assumptions and results.

Emissions associated with daily traffic were modeled using trip generation rates provided in the Transportation Impact Study prepared for the proposed Project (Appendix F). The proposed Project was assumed to generate 1,453 daily trips, as discussed in the Transportation Impact Study. CalEEMod default trip rates, trip percentages, and trip purpose percentages vary by CalEEMod land use type. As shown in Table 3-4, the proposed Project would consist of several types of land uses. All trips were allocated to the General Light Industry land use type in CalEEMod, which assumes the most conservative trip percentages and trip purpose percentages. This would equate to a trip rate of 11,72 trips per 1,000 square feet on weekdays. CalEEMod default trip rates were adjusted for Saturdays and Sundays (based on the weekday trip rate) for a trip rate of 2.22 and 1.14 trips per day per 1,000 square feet, respectively.

CalEEMod default data for temperature, variable start information, and emission factors were conservatively assumed for the model inputs. Project-related traffic was assumed to consist of a mixture of vehicles in accordance with the model outputs for traffic. Emission factors representing the vehicle mix and emissions for 2026 were used to represent proposed Project buildout.

CalEEMod was used to estimate emissions from the area sources, which include natural gas appliances, space and water heating, gasoline-powered landscape maintenance equipment, use of consumer products, and architectural coatings for maintenance of buildings. The estimated operational area source emissions were based on land use defaults of the proposed Project.

CalEEMod was also used to calculate emissions associated with forklift operation. It was assumed that 10 forklifts would operate on site for 4 hours a day. Exterior forklifts would be powered by diesel engines and would operate at 89 horsepower.

The proposed Project would also include the following stationary sources:

- One paint spray booths that would be collocated in the southern portion of the site;

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- A CNG fueling station that would be located in the southeastern portion of the site, with a dispenser located to the east of the internal roadway; and
- Four emergency generators that would be located in four different locations, specifically immediately north of the weld shop, in the meter yard, north of Supply Chain Services, and near the parking structure.

The HRA prepared for the Project calculated the criteria air pollutant emissions associated with these stationary sources, forklifts, and on-site delivery truck exhaust. However, the emissions associated with the CNG fueling station would be negligible, because CNG is not considered to be a toxic air contaminant (TAC), and therefore, were not estimated.

For the spray booth, material mass balance calculations were performed for two types of SCAQMD Rule 1151(d)(1) compliant coatings to be used in the booths. These include “Amersshield,” with a VOC content of 223 grams per liter (g/l) and “Amerlock,” with a VOC content of 90 g/l VOC as applied. Per Rule definitions, the VOC contents are expressed as less water and less exempt compounds. Both coatings are under the 250 g/l limit in the SCAQMD Rule 1151 for “Any Other Coating Type.” It was assumed that the booth would operate four days per week and use six gallons of coatings per day each.

The four Tier 2 diesel emergency generators would be permitted to operate up to 50 hours per year for maintenance and testing purposes under the statewide Airborne Toxic Control Measure regulation (17 CCR 93115). As Tier 2 engines (40 CFR 89.112; EPA 2016), emissions of diesel particulate matter (DPM) are limited to 0.15 grams per brake horsepower-hour (g/BHP-hr).

Two scenarios were modeled to determine maximum daily criteria air pollutant emissions: maintenance and testing. Maintenance would occur for a maximum of 30 minutes per day. The maintenance maximum fuel usage (i.e., input load factor) would vary depending on engine size and would range between 27% and 29% of maximum fuel consumption. The engine load factor was assumed to be 25%. Testing emissions were calculated assuming operation for 24 hours at a 100% load factor. Maintenance and testing criteria air pollutant emissions are shown in Table 3-5.

Table 3-5. Estimated Maximum Daily Emergency Generator Emissions (2026) – Unmitigated

Generator Location	VOCs	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
<i>Maintenance (Pounds per Hour)</i>						
Generator 1 – Supply Chain	0.13	1.15	0.70	0.00	0.04	0.04
Generator 2 – Weld Shop	0.21	1.85	1.13	0.00	0.06	0.06
Generator 3 – Meter Yard	0.16	1.41	0.85	0.00	0.05	0.05
Generator 4 – Parking	0.11	1.03	0.62	0.00	0.04	0.04
<i>Maintenance maximum (pounds per hour)</i>	<i>0.21</i>	<i>1.85</i>	<i>1.13</i>	<i>0.00</i>	<i>0.06</i>	<i>0.06</i>
Daily totals (pounds per day)	0.60	5.44	3.31	0.01	0.19	0.19

Table 3-5. Estimated Maximum Daily Emergency Generator Emissions (2026) – Unmitigated

Generator Location	VOCs	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
<i>Testing (Pounds per Day)</i>						
Generator 1 – Supply Chain	22.8	205.1	124.7	0.2	7.2	7.1
Generator 2 – Weld Shop	34.2	307.6	187.0	0.4	10.8	10.7
Generator 3 – Meter Yard	26.4	237.6	144.5	0.3	8.3	8.3
Generator 4 – Parking	19.1	171.5	104.3	0.2	6.0	6.0
Daily totals (pounds per day)	102.00	922.00	560.00	1.00	32.20	32.00

Source: See Appendix A for complete results.

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter.

The maximum daily total emissions would occur during the emergency generator testing scenario. Table 3-6 presents the maximum daily area, energy, mobile source, on-site equipment, and stationary source emissions combined. The values shown are the maximum summer or winter daily emissions results from CalEEMod, or spreadsheet calculations in the case of the stationary sources. Table 3-6 presents both the emergency testing and maintenance scenarios separately, but combined with the maximum daily area, energy, mobile source, off-road equipment, and spray booth emissions. The emergency generator testing presents a worst-case scenario.

Table 3-6. Estimated Daily Maximum Operational Emissions (2026) – Unmitigated

Emissions Source	VOCs	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	<i>Pounds per Day</i>					
<i>Maintenance Scenario</i>						
Area	6.80	0.00	0.07	<0.01	<0.01	<0.01
Energy	0.11	0.96	0.80	0.01	0.07	0.07
Mobile	2.34	10.46	34.75	0.15	13.79	3.76
Forklifts	0.44	4.11	5.70	0.01	0.22	0.20
Spray Booths	7.84	—	—	—	1.60	1.60
Emergency Generators	0.60	5.44	3.31	0.01	0.19	0.19
Combined Total Emissions	18.12	21.24	44.64	0.17	15.87	5.82
<i>SCAQMD Pollutant Threshold</i>	<i>55</i>	<i>55</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
Threshold Exceeded?	No	No	No	No	No	No
<i>Testing Scenario</i>						
Area	6.80	0.00	0.07	<0.01	<0.01	<0.01
Energy	0.11	0.96	0.80	0.01	0.07	0.07
Mobile	2.34	10.46	34.75	0.15	13.79	3.76
Forklifts	0.44	4.11	5.70	0.01	0.22	0.20
Spray Booths	7.84	—	—	—	1.60	1.60

Table 3-6. Estimated Daily Maximum Operational Emissions (2026) – Unmitigated

Emissions Source	VOCs	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	<i>Pounds per Day</i>					
Emergency Generators	102.00	922.00	560.00	1.00	32.20	32.00
Combined Total Emissions	119.52	937.80	601.33	1.16	47.88	37.63
<i>SCAQMD Pollutant Threshold</i>	<i>55</i>	<i>55</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
Threshold Exceeded?	Yes	Yes	Yes	No	No	No

Source: See Appendix A for complete results.

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter; a dash (—) represents information that is not available.

As shown in Table 3-6, the total daily operational emissions under the maintenance scenario would not exceed the SCAQMD operational significance thresholds for VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}. However, under the worst-case testing scenario, the total daily operational emissions would exceed the SCAQMD operational significance thresholds for VOC, NO_x, and CO. These potential exceedances could result in significant impacts if unmitigated.

MM-AQ-1 would limit the hours of emergency generator testing and would require that testing of multiple generators would not occur on the same day. Table 3-7 presents the maximum daily area, energy, mobile source, on-site equipment, and stationary source emissions combined, upon implementation of MM-AQ-1. Because MM-AQ-1 would require that only one emergency generator operates on a single day, Table 3-7 presents the emergency generator with the highest emissions per day of operation (Generator 2- Weld Shop).

Table 3-7. Estimated Daily Maximum Operational Mitigated Emissions (2026) – Mitigated

Emissions Source	VOCs	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
	<i>Pounds per Day</i>					
<i>Testing Scenario</i>						
Area	6.80	<0.01	0.07	<0.01	<0.01	<0.01
Energy	0.11	0.96	0.80	0.01	0.07	0.07
Mobile	2.34	10.73	34.75	0.15	13.79	3.76
Forklifts	0.44	4.11	5.70	0.01	0.22	0.20
Spray Booths	7.84	—	—	—	1.60	1.60
Emergency Generators (Gen 2 – Weld Shop)	4.28	38.45	23.38	0.05	1.35	1.34
Combined Total Emissions	21.79	54.25	64.70	0.21	17.03	6.97
<i>SCAQMD Pollutant Threshold</i>	<i>55</i>	<i>55</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
Threshold Exceeded?	No	No	No	No	No	No

Source: See Appendix A for complete results.

Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter; a dash (—) represents information that is not available.

Mitigated emissions account for implementation of MM-AQ-1.

As shown in Table 3-7, the total daily operational emissions under the testing scenario would not exceed the SCAQMD operational significance thresholds for VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}, upon implementation of MM-AQ-1. As such, the Project would result in a less-than-significant impact during operation upon implementation of MM-AQ-1.

Mitigation Measures

MM-AQ-1 No more than one emergency generator unit shall be operated for testing purposes on a single day. Each emergency generator shall not operate more than 3.0 hours per day for testing purposes. If engine models and specifications change from what was originally analyzed, engine testing time shall be limited so as not to emit more than 37 pounds per day of volatile organic compounds, 39 pounds per day of oxides of nitrogen, 508 pounds per day of carbon monoxide, 149 pounds per day of sulfur oxides, 134 pounds per day of particulate matter with a diameter less than or equal to 10 microns, and 49 pounds per day of particulate matter with an aerodynamic diameter less than or equal to 2.5 microns.

Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the SCAQMD develops and implements plans for future attainment of ambient air quality standards. In considering cumulative impacts from the proposed project, the analysis must specifically evaluate a project's contribution to the cumulative increase in pollutants for which the SCAB is designated as nonattainment for the CAAQS and NAAQS. If a project's emissions would exceed the SCAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution to nonattainment status in the SCAB. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant (SCAQMD 2003).

The SCAB is a nonattainment area for O₃ and PM_{2.5} under the NAAQS and is a nonattainment area for O₃, PM₁₀, and PM_{2.5} under the CAAQS. The nonattainment status is the result of cumulative emissions from various sources of air pollutants and their precursors within the SCAB including motor vehicles, off-road equipment, and commercial and industrial facilities. Construction and operation of the Project would generate VOC and NO_x emissions (which are precursors to O₃) and emissions of PM₁₀ and PM_{2.5}. However, as indicated in Tables 3-3 and 3-7, Project-generated construction and operational emissions (with implementation of MM-AQ-1), respectively, would not exceed the SCAQMD emission-based significance thresholds for VOC, NO_x, PM₁₀, or PM_{2.5}; therefore, the Project would not cause a cumulatively significant impact.

Cumulative localized impacts could occur if the construction of a project component were to occur concurrently with another project. Construction schedules for potential future projects near the planning area are currently unknown; therefore, potential construction impacts associated with two simultaneous projects are speculative. The CEQA Guidelines state that if a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact (14 CCR 15145).

However, air pollutant emissions associated with construction activity would be reduced through implementation of control measures required by SCAQMD. Cumulative PM₁₀ and PM_{2.5} construction emissions would be reduced because all future projects would be subject to SCAQMD Rule 403 (Fugitive Dust), which sets forth general and specific requirements for all construction sites in SCAQMD. The maximum daily PM₁₀ and PM_{2.5} emissions would not exceed the significance thresholds during Project construction activities, although fugitive dust, as well as vehicle and equipment exhaust, generated during Project construction would contribute to the SCAB's nonattainment designation for PM₁₀ and PM_{2.5}; however, this contribution would not be considered cumulatively considerable.

Furthermore, the Project would not conflict with growth assumptions in the SCAQMD 2016 AQMP, which addresses the cumulative emissions in the SCAB.

In 2026, upon buildout of the Project, it is anticipated that 416 employees would be employed at the Water Facility. As discussed in Section 3.3(a), this increase is only 0.10% of SCAG's 2016–2040 RTP/SCS overall growth of 472,700 employees for the City from 2012 to 2040. Therefore, the Project would be consistent at a regional level with the underlying growth forecasts in the AQMP.

Based on the above considerations, the proposed Project would not result in a cumulatively considerable contribution to the nonattainment pollutants in the SCAB, and this impact would be less than significant.

c) *Would the Project expose sensitive receptors to substantial pollutant concentrations?*

Less-Than-Significant Impact. Sensitive receptors include residential land uses, schools, open space and parks, recreational facilities, hospitals, resident care facilities, daycare facilities, or other facilities that may house individuals with health conditions that would be affected by poor air quality.

Localized Significance Thresholds Analysis. The SCAQMD recommends the evaluation of localized NO₂, CO, PM₁₀, and PM_{2.5} construction-related impacts on sensitive receptors in the immediate vicinity of a project site. Residences in the Project area would be located 570 feet from the Project site. These residents would be considered sensitive receptors that could be affected by construction-generated air pollutant emissions.

The Project site is located in Source Receptor Area 6 (West San Fernando Valley). The maximum number of acres disturbed on the peak day was estimated using the “Fact Sheet for Applying CalEEMod to Localized Significance Thresholds” (SCAQMD 2011), which provides estimated acres per 8-hour day for crawler tractors, graders, rubber tired dozers, and scrapers. Based on the SCAQMD guidance, and assuming an excavator can grade 0.5 acres per 8-hour day (similar to graders, dozers, and tractors), it was estimated that the maximum acres on the Project site that would be disturbed by off-road equipment would be 6.5 acre per day (one excavator, one grader, four rubber tired dozer, and seven tractors/loaders/backhoes operating during the grading phase). It was assumed the proposed Project would disturb 5 acres per day, which is more conservative than 6.5 acres per day

based on lower LST emission thresholds. The closest receptors to construction activity would be the residents located 174 meters (570 feet) south of the Project site. Therefore, the SCAQMD Localized Significance Threshold (LST) thresholds for 100 meters (328 feet) was assumed.

Construction activities associated with the proposed Project would result in temporary sources of on-site fugitive dust and construction equipment emissions. Off-site emissions from vendor trucks, haul trucks, and worker vehicle trips are not included in the LST analysis (SCAQMD 2008). The SCAQMD LST Methodology specifies the maximum allowable daily emissions that would satisfy the localized significance criteria. The maximum daily on-site construction emissions are compared to the allowable emission rates for Source Receptor Area 2 in Table 3-8. Additional details of the LST analysis are provided in Appendix A.

Table 3-8. Localized Significance Threshold Analysis for Construction Emissions

Pollutant	Maximum Construction Emission Scenario Construction Phase	Maximum Construction Emissions (lb/day)	LST Criteria (lb/day)	Exceeds LST?
NO ₂	Grading, Building Construction, Paving, Architectural Coating	177	226	No
CO	Grading, Building Construction, Paving, Architectural Coating	160	2,438	No
PM ₁₀	Grading, Building Construction, Paving, Architectural Coating	9	51	No
PM _{2.5}	Grading, Building Construction, Paving, Architectural Coating	8	13	No

Source: SCAQMD 2008.

Notes: LST = Localized Significance Threshold; lb/day = pounds per day; NO₂ = nitrogen dioxide; CO = carbon monoxide; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter.

Construction emissions estimates are rounded to the nearest pound.

LSTs were determined based on the values for Source Receptor Area 6, a 5-acre site, at a distance of 100 meters from the nearest sensitive receptor.

As shown in Table 3-8, construction activities would not generate substantial emissions of pollutants to sensitive receptors. Impacts to sensitive receptors in the vicinity of Project construction would be less than significant.

Carbon Monoxide Hotspots. Regional trip generation and an increase the vehicle miles traveled within the local airshed and the SCAB would occur with or without the Project. Locally, traffic would be added to the City roadway system near the Project. If such traffic occurs during periods of poor atmospheric ventilation, is composed of a large number of vehicles cold-started and operating at pollution-inefficient speeds, and is operating on roadways already crowded with non-Project traffic, there is a potential for the formation of microscale CO hotspots in the area immediately around points of congested traffic. These high CO concentrations (“hotspots”) associated with roadways or intersections operating at an unacceptable level of service (LOS) are a concern because CO is toxic to humans in high concentrations; however, because of

continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SCAB is steadily decreasing.

Projects contributing to adverse traffic impacts may result in the formation of CO hotspots. To verify that the proposed Project would not cause or contribute to a violation of the CO standard, a screening evaluation of the potential for CO hotspots was conducted. The Transportation Impact Study (Appendix F) evaluated whether there would be a decrease in the LOS (e.g., congestion) at the intersections affected by the Project. The potential for CO hotspots was evaluated based on the results of the Transportation Impact Study. The California Department of Transportation (Caltrans) *Institute of Transportation Studies Transportation Project-Level Carbon Monoxide Protocol* (CO Protocol) (Caltrans 1997) was followed.

In accordance with the CO Protocol, CO hotspots are typically evaluated when (1) the project significantly increases traffic volumes (5% or higher) or otherwise worsens traffic flow, (2) projects involve signalized intersections at LOS E or F, (3) projects result in worsening of signalized intersection LOS to E or F, and (4) projects are suspected of resulting in higher CO concentrations than those existing within the region at the time of attainment demonstration.

In general, SCAQMD recommends that a quantitative CO hotspots analysis be performed for any intersections where the LOS worsens from C to D or for intersections that experience an increase in volume-to-capacity (V/C) ratio of 2% or more as a result of a project for intersections rated D or worse.

The Transportation Impact Study evaluated 18 key intersections in the Project vicinity to assess existing traffic conditions (2018), existing plus Project traffic conditions (2018), future (2023) without Project cumulative traffic conditions, and future (2023) with Project cumulative traffic conditions (see Appendix F). Table 3-9 these scenarios and whether a CO hotspot analysis is required per the CO Protocol and SCAQMD recommendations.

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Table 3-9. Peak Hour Intersection CO Hotspot Screening

Key Intersection	Time Period	Existing 2018 Traffic Conditions		Existing Plus Project Traffic Conditions		Year 2023 Cumulative Traffic Conditions		Year 2023 Cumulative Plus Project Traffic Conditions		Requires CO Hotspot Analysis?
		V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	
1. Van Nuys Boulevard & Saticoy Street	a.m.	0.711	C	0.726	C	0.734	C	0.749	C	No
	p.m.	0.764	C	0.777	C	0.787	C	0.800	C	
2. Van Nuys Boulevard & Valerio Street	a.m.	0.562	A	0.563	A	0.583	A	0.583	A	No
	p.m.	0.614	B	0.614	B	0.635	B	0.636	B	
3. Tyrone Avenue & Covello Street ^a	a.m.	0.258	A	0.272	A	0.268	A	0.282	A	No
	p.m.	0.273	A	0.279	A	0.283	A	0.290	A	
4. Hazeltine Avenue & Valerio Street	a.m.	0.593	A	0.650	B	0.611	B	0.668	B	No
	p.m.	0.548	A	0.585	A	0.566	A	0.601	B	
5. Woodman Avenue & Valerio Street	a.m.	0.809	D	0.824	D	0.833	D	0.849	D	Yes
	p.m.	0.631	B	0.661	B	0.653	B	0.683	B	
6. Van Nuys Boulevard & Sherman Way	a.m.	0.660	B	0.666	B	0.699	B	0.705	C	Yes
	p.m.	0.763	C	0.770	C	0.797	C	0.803	D	
7. Tyrone Avenue & Sherman Way	a.m.	0.464	A	0.468	A	0.481	A	0.485	A	No
	p.m.	0.439	A	0.440	A	0.458	A	0.458	A	
8. Hazeltine Avenue & Sherman Way	a.m.	0.764	C	0.765	C	0.789	C	0.791	C	No
	p.m.	0.707	C	0.732	C	0.732	C	0.757	C	
9. Woodman Avenue & Sherman Way	a.m.	0.892	D	0.900	D	0.920	E	0.929	E	Yes
	p.m.	0.849	D	0.853	D	0.877	D	0.881	D	

Notes:

CO = carbon monoxide; V/C = volume-to-capacity ratio; LOS = level of service; SCAQMD = South Coast Air Quality Management District. Bold V/C and LOS data represent traffic conditions that trigger the SCAQMD CO Hotspot quantitative analysis requirements.

A total of three intersections would deteriorate from LOS C to D or would experience an increase in the V/C ratio of 2% or more as a result of the Project for intersections rated LOS D or worse under year 2023 cumulative plus Project traffic conditions, and therefore require a CO hotspot analysis per SCAQMD recommendations:

- Woodman Avenue & Valerio Street
- Van Nuys Boulevard & Sherman Way
- Woodman Avenue & Sherman Way

The potential impact of the proposed Project on local CO levels was assessed at these intersections with the Caltrans CL4 interface, based on the CALINE4, which allows microscale CO concentrations to be estimated along each roadway corridor or near intersections (Caltrans 1998a).

The modeling analysis was performed for worst-case wind angle, in which the model selects the wind angles that produce the highest CO concentrations at each of the receptors. The urban land classification of 100 centimeters (40 inches) was used for the aerodynamic roughness coefficient, which determines the amount of local air turbulence that affects plume spreading. The at-grade option was used for the roadway sections in the analysis; for at-grade sections, CALINE4 does not permit the plume to mix below ground level. The mixing zone, which is defined as the width of the roadway plus 3 meters (10 feet) on either side, was estimated for each roadway using Google Earth (2016). The calculations assume a mixing height of 10 meters (33 feet), a flat topographical condition between the source and the receptor (link height of 0 meters), and a meteorological condition of little to almost no wind (1.0 meter (3.3 feet) per second), consistent with Caltrans guidance (Caltrans 1998b).

The emission factor represents the weighted average emission rate of the local Los Angeles County vehicle fleet expressed in grams per mile per vehicle. Consistent with the Transportation Impact Study (Appendix F), emission factors for 2023, consistent with the Traffic Impact Study, representing the year 2023 cumulative plus Project traffic conditions, were predicted by EMFAC2017 and were used in the CALINE4 model. Emission factors were based on a 5-mph average speed for all of the intersections and a temperature of 40°F.³ The hourly traffic volume anticipated to travel on each link, in units of vehicles per hour, was based on the Transportation Impact Study (Appendix F). Since Project-generated traffic would have the highest impact to the Van Nuys Boulevard & Sherman Way intersection in the PM peak hour, vehicle counts for the PM peak hour were used. Since Project-generated traffic would have the highest impact to the Woodman Avenue &

³ January is usually the coldest month of the year in Burbank, with an average minimum temperature of 42°F (WRCC 2006). Assuming a 5-degree correction factor for PM traffic conditions, average evening temperature would be approximately 47°F. However, as these meteorological readings are for the Burbank Valley Pump Plant, and as CO concentrations generally increase with a decrease in temperature, a temperature of 40°F (4.4°C) was conservatively used to determine the emission factors in EMFAC and CO concentrations in CALINE4.

Valerio Street and Woodman Avenue & Sherman Way intersections in the AM hour, vehicle counts for the AM peak hour were used.

Four receptor locations at each intersection were modeled to determine CO ambient concentrations. A receptor was assumed on the sidewalk at each corner of the modeled intersections, for a total of four receptors adjacent to the intersection, to represent the possibility of extended outdoor exposure. CO concentrations were modeled at these locations to assess the maximum potential CO exposure that could occur in 2023. A receptor height of 1.8 meters (5.9 feet) was used in accordance with Caltrans recommendations for all receptor locations (Caltrans 1998b).

The maximum 1-hour CO background concentration of 3.0 parts per million (ppm), as measured in 2017,⁴ was assumed in the CALINE4 model (EPA 2018b). The model provides predicted concentrations in ppm at each of the receptor locations. To estimate an 8-hour average CO concentration, a persistence factor of 0.7, as is recommended for urban locations, was applied to the output values.

The results of the model are shown in Table 3-10, CALINE4 Predicted CO Concentrations. Model input and output data are contained in Appendix A.

Table 3-10. CALINE4 Predicted CO Concentrations

Intersection	Maximum Modeled Impact Year 2023 Cumulative Plus Project Conditions (ppm)	
	1-hour	8-hour ^a
Woodman Avenue & Valerio Street	3.7	2.6
Van Nuys Boulevard & Sherman Way	3.7	2.6
Woodman Avenue & Sherman Way	3.8	2.7

Source: Caltrans 1998a (CALINE4).

Notes:

CO = carbon monoxide; ppm = parts per million; I-405 = Interstate 405, NB = Northbound

^a 8-hour concentrations were obtained by multiplying the 1-hour concentration by a factor of 0.7, as referenced in Caltrans 1997, Table B.15.

As shown in Table 3-10, maximum CO concentrations predicted for the 1-hour averaging period would be 3.8 ppm, which is below the state 1-hour CO standard of 20 ppm (see Table 3-2 for state standards). Maximum predicted 8-hour CO concentrations of 2.7 ppm would be below the state CO standard of 9.0 ppm. Neither the 1-hour nor 8-hour state standard would be equaled or exceeded at any of the intersections studied. Accordingly, impacts would be less than significant.

⁴ The closest CO monitoring station location to the proposed Project is the station located at 18330 Gault Street, Reseda.

Toxic Air Contaminants. An HRA was prepared to assess the potential for health risks due to emissions of TACs from the paint booths, new emergency generators, and diesel-fueled forklifts and truck traffic that would be required as part of the Project.

Emissions Estimates

Emission calculations were performed for two categories of stationary sources at the facility: one paint spray booth and four emergency generators powered by diesel engines. The diesel truck traffic and forklifts were modeled as line-volume sources. Although there would be a CNG fueling station associated with the Project, this source would have negligible TAC emissions, because CNG is not considered to be a TAC, and hence was not analyzed as part of the HRA.

Spray Booths

Material mass balance calculations were performed for two types of SCAQMD Rule 1151(d)(1) compliant coatings to be used in the booths: “Amershield” (223 g/l VOC as applied) and “Amerlock” (90 g/l VOC as applied). Per Rule definitions, the VOC contents are expressed as less water and less exempt compounds. Both coatings are under the 250 g/l limit in Rule 1151 for “Any Other Coating Type.”

Both coatings are two-part chemistry where Part A is the resin and Part B is the hardener (catalyst) combined in a 3:1 ratio. It was estimated that the spray booth would operate four days per week and use six gallons of coatings per day each; therefore, annual usage would be as follows:

$$1 \text{ booth} \times 6 \text{ gallons/day} \times 4 \text{ days/week} \times 50 \text{ weeks/year} = 1,200 \text{ gallons/year total usage}$$

For risk assessment purposes, equal amounts of the two coatings were assumed, i.e., 600 gallons per year each comprising 450 gallons resin plus 150 gallons hardener. Safety Data Sheets were reviewed for each material and the amount of listed TACs in VOC and corresponding emission factors for each component determined as follows:

$$\text{weight fraction TAC} \times \text{specific gravity} \times 8.34 \text{ lbs/gallon} = \text{lbs/gallon TAC}$$

Annual and hourly mass emissions of each TAC shown in Appendix A were calculated as follows:

$$\text{lbs/gallon TAC} \times \text{gallons/year sprayed} = \text{lbs/year TAC emitted}$$

$$\text{lbs/gallon TAC} \times \text{gallons/hour sprayed} = \text{lbs/hour TAC emitted}$$

Since the booths would be used for applying Rule 1151(d)(1) compliant coatings, VOC controls are not required by the SCAQMD; thus, TACs in the VOC emissions would be uncontrolled.

For paint solids, particulate emissions are controlled by (1) HVLP (high-volume low-pressure) spray guns with a minimum transfer efficiency of 65%, and (2) high-efficiency particulate filters in the booth exhaust air pathway with a minimum control efficiency of 90%. Since the booths are totally enclosed, capture efficiency is 100%. Thus, combined capture and control efficiency (CCE) is 96.5%:

$$CCE = [1 - (1 - 0.65) \times (1 - 0.90)] = 0.965 \times 100 = 96.5\%$$

None of the coating materials proposed for use in the spray booths contain air toxic particulates, such as may be found in paint pigments. Therefore, although emissions of particulate matter were quantified using the methodology shown above, these emissions were not included in the dispersion modeling or HRA analysis (Appendix A).

Diesel Emergency Generators

Four Tier 2 diesel emergency generators would be permitted to operate up to 50 hours per year for maintenance and testing purposes under the statewide Airborne Toxic Control Measure regulation (17 CCR 93115). As Tier 2 engines (40 CFR 89.112; EPA 2016), emissions of DPM are limited to 0.15 g/BHP-hr.

For each model of emergency generator, the manufacturer's performance data sheet was obtained to determine (1) rated engine horsepower, and (2) fuel consumption rates at 100%, 75%, 50%, and 25% output loads. From these data, the percent of maximum fuel usage, i.e., input load factor, at maintenance load (i.e., 25% output) was calculated. Depending on engine size, these maintenance input load factors ranged between 27% and 29% of maximum fuel consumption. For each generator, DPM emissions were calculated as follows:

$$0.15 \text{ g/BHP-hr} \times \text{rated BHP} \times \text{load factor} \times 1 \text{ lb}/453.6 \text{ g} \times 50 \text{ hours/year} = \text{lbs/year DPM}$$

$$0.15 \text{ g/BHP-hr} \times \text{rated BHP} \times \text{load factor} \times 1 \text{ lb}/453.6 \text{ g} = \text{lbs/hr DPM}$$

For cancer and chronic hazard index risk assessment purposes, maintenance input load factors were used to predict the average annual DPM emission rates for 50 hours per year operation.

Diesel Forklifts and Truck Traffic

The primary TAC of concern emitted from the Project vehicle operations is DPM. DPM emissions were calculated using CalEEMod. All PM₁₀ emissions from the forklift and on-site delivery truck exhaust were considered to be DPM for the HRA. The estimated emissions are shown in Table 3-11.

Table 3-11. TAC Emission Summary

Source	CAS No.	Toxic Air Contaminant	Annual Emissions (lb/yr)	Hourly Emissions (lb/hr)
Spray Booth	1330207	Xylene	261.5	0.33
	100414	Ethylbenzene	70.8	0.09
	108656	2-methoxy-1-methylethyl acetate	53.3	0.07
	822060	Hexamethylene diisocyanate	1.4	0.00
	95636	1,2,4-trimethylbenzene	56.3	0.07
	108952	Phenol	8.8	0.01
Gen 1 - Supply Chain	9901	DPM	4.1	0.30
Gen 2 - Weld Shop	9901	DPM	6.5	0.45
Gen 3 - Meter Yard	9901	DPM	4.9	0.35
Gen 4 - Parking	9901	DPM	3.6	0.25
Forklifts	9901	DPM	57.2	0.00918
Truck Traffic	9901	DPM	2.52	0.000378

Source: Appendix A

Modeling and Risk Assessment Methodologies

Air Dispersion Modeling

Air dispersion models calculate the atmospheric transport and fate of pollutants from the emission source. The models calculate the concentration of selected pollutants at specific downwind ground-level points, such as residential or off-site workplace receptors. The transformation (fate) of an airborne pollutant, its movement with the prevailing winds (transport), its crosswind and vertical movement due to atmospheric turbulence (dispersion), and its removal due to dry and wet deposition are influenced by the pollutant's physical and chemical properties and by meteorological and environmental conditions. Factors such as distance from the source to the receptor, meteorological conditions, intervening land use and terrain, pollutant release characteristics, and background pollutant concentrations affect the predicted air concentration of an air pollutant. Air dispersion models take all of these factors into consideration when calculating downwind ground-level pollutant concentrations.

The air dispersion modeling methodology was based on generally accepted modeling practices of the SCAQMD (2018). The air dispersion model used for this HRA was AERMOD Version 18081, with the Lakes Environmental Software implementation/user interface, AERMOD View™ Version 9.6.5. AERMOD was run with all sources emitting unit emissions (1 gram per second) to obtain the X/Q values that are necessary for input into CARB's Hotspots Analysis and Reporting Program Version 2 (HARP2).

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Regulatory defaults, the “Urban” modeling option,⁵ and “Elevated” terrain were used for the analysis. AERMOD-ready pre-processed meteorological (MET) data files were taken directly from the SCAQMD’s website. Burbank was chosen as the MET station closest to and most representative of conditions at the facility. The MET data files contained data for the years 2012 through 2016.

Digital elevation data were imported into AERMOD and elevations were assigned to receptors, buildings, and emission sources, as necessary. Digital elevation data were obtained through the AERMOD View™ WebGIS import feature from the 30-meter National Elevation Dataset files from the U.S. Geological Survey.

HRA results were obtained at various locations around the facility. These receptor locations were identified as (1) the facility boundary, (2) a grid network of receptors to establish the impact area and area where the maximum impact would occur, and 3) discrete receptors that were positioned at specific locations of concern.

Discrete Cartesian receptors were used to evaluate the locations of the maximally exposed residential, sensitive, and off-site workplace receptors. A series of receptors were placed along the residences to the south and northeast of the Project site. Receptors were located at the three nearest schools: Ranchito Avenue Elementary approximately 675 meters to the northeast, Panorama High School approximately 750 meters to the north, and Hazeltine Elementary approximately 850 meters to the south. Four on-site buildings close to the emission sources were included in the modeling using best available dimensional data.

The exhaust stacks from each coating booth and each emergency generator were modeled as individual point sources. The release parameters for each source are shown in Table 3-12 and were obtained from similar equipment.

Table 3-12. Emission Sources and Release Parameters

Stack IDs	Description	Stack Height (meters)	Stack Diameter (meters)	Stack Velocity (meters/second)	Stack Temp (degrees Kelvin)	UTM x (meters)	UTM y (meters)
COATPNT	Paint Booth - Coating Shop	16.764	0.762	12.42	294	367,179.89	3,786,257.10
GEN1	Gen 1 - Supply Chain	3.480	0.152	222.22	734	366,992.03	3,786,417.87
GEN2	Gen 2 - Weld Shop	3.912	0.229	171.05	803	367,001.32	3,786,292.33
GEN3	Gen 3 - Meter Yard	3.912	0.203	175.51	823	367,097.76	3,786,334.59
GEN4	Gen 4 - Parking	3.327	0.152	209.89	797	367,179.89	3,786,257.10

⁵ The project is located in Los Angeles County. The population used for the analysis was 9,862,049 per the SCAQMD Modeling Guidance for AERMOD (SCAQMD 2016b).

Table 3-12. Emission Sources and Release Parameters

Stack IDs	Description	Stack Height (meters)	Stack Diameter (meters)	Stack Velocity (meters/second)	Stack Temp (degrees Kelvin)	UTM x (meters)	UTM y (meters)
Stack IDs	Description	Plume Height (meters)	Plume Width (meters)	Release Height (meters)	Configuration Type		
SLINE1	Truck Traffic	5.1	9.0	2.55	Separated 2W		
SLINE2	Forklifts	3.4	8.0	1.70	Separated 2W		

Source: Appendix A.

Health Risk Assessment

The HRA followed the SCAQMD Tier-4 techniques, which are based on the Office of Environmental Health Hazard Assessment (OEHHA) Tier-1 techniques, to calculate the health risk impacts at all receptors including the nearby residential, sensitive. The health risk calculations were performed using the HARP2 Air Dispersion and Risk Tool (version 19044). The X/Q values that were determined for each source using AERMOD were imported into HARP2 and used in conjunction with hourly and annual emissions to determine the ground level concentrations for each pollutant. The ground level concentrations were used to estimate the long-term cancer health risk to an individual, and the non-cancer chronic and acute health indices.

Maximum Individual Cancer Risk (MICR) is the estimated probability of a maximally exposed individual potentially contracting cancer as a result of exposure to TACs over a period of 30 years for residential receptor locations. Sensitive receptors such as schools, hospitals, convalescent homes, and day-care centers are evaluated the same as residences.

Per SCAQMD (2015b) guidance, the exposure pathways used to estimate the MICR for residential/sensitive receptors are listed in Table 3-13. Any exposure pathways not explicitly shown in Table 3-13, (e.g., drinking water consumption) were not included in the HRA (Appendix A).

Table 3-13. Exposure Pathways

Exposure Pathway	Residential/Sensitive	Off-Site Workplace
Inhalation	Yes	Yes
Homegrown Produce	Yes	No
Dermal	Yes	Yes
Soil Ingestion	Yes	Yes
Mother's Milk	Yes	No

Note: See Appendix A.

Per SCAQMD (2015b) guidelines, the MICR estimates assumed a deposition velocity of 0.02 meter per second and a warm climate for the dermal pathway. Residential/sensitive estimates were calculated using CARB's Risk Management Policy (RMP), "RMP Using the Derived Method." The "RMP Using the Derived Method" uses high end breathing rates (95th percentile) for children from the third trimester through age 2, and 80th percentile breathing rates for all other ages for residential exposures (OEHHA 2015).

Some TACs increase non-cancer health risk due to long-term (chronic) exposures. The Chronic Hazard Index (HIC) is the sum of the individual substance chronic hazard indices for all TACs affecting the same target organ system. The HIC estimates used the "OEHHA Derived" calculation method (OEHHA 2015).

Some TACs increase non-cancer health risk due to short-term (acute) exposures. The Acute Hazard Index is the sum of the individual substance acute hazard indices for all TACs affecting the same target organ system. Acute risk is calculated from a 1-hour exposure using the "OEHHA Derived" calculation method (OEHHA 2015).

Cancer burden is the estimated increase in the occurrence of cancer cases in a population subject to a MICR of greater than or equal to one in one million (1.0×10^{-6}) based on a 70-year exposure to TACs. The cancer burden is determined for the population located within the zone of impact, defined as the area within the one in one million cancer risk isopleth for a 70-year exposure. HARP2 is able to generate an isopleth, a line of a constant value, showing the area exposed to a cancer risk above one in one million.

Results

The HARP2 output reports for all results presented in this section can be found in Appendix A.

The results of the AERMOD/HARP2 HRA are summarized in Table 3-14. The following CEQA Significance Thresholds were used as the basis for determining impacts (SCAQMD 2015a):

- Maximum Incremental Cancer Risk ≥ 10 in 1 million
- Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million)
- Chronic & Acute Hazard Index ≥ 1.0 (project increment)

Table 3-14 shows that at all receptor types the predicted health risks are less than the SCAQMD Significance Thresholds (SCAQMD 2015b).

Table 3-14. Health Risk Results

Impact Parameter	Receptor Type	Health Risk Impact	SCAQMD Significance Threshold	Significant
		(dimensionless)	(dimensionless)	(Yes/No)
MICR	Resident	6.55 in a million	10 in a million	No
	Sensitive	1.35 in a million	10 in a million	No
HIC	Resident	0.00176	1	No
	Sensitive	0.000368	1	No
Acute Hazard Index	Resident	0.000391	1	No
	Sensitive	0.00004	1	No
Cancer Burden		0.0243	0.5	No

Sources: SCAQMD 2015a, 2015b; Appendix A.

Table 3-14 shows that the predicted health risks are less than the SCAQMD Significance Thresholds (SCAQMD 2015b). Therefore, impacts to sensitive receptors would be less than significant.

d) *Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

Less-Than-Significant Impact. Construction of the Project would result in emissions from diesel equipment, gasoline, and asphalt paving material fumes. Odors from these sources would be localized and generally confined to the Project site. Construction of the Project would use typical construction techniques in compliance with SCAQMD rules. Odors would be highest near the source and would quickly dissipate off site. Any odors associated with construction activities would be temporary and would cease upon completion of construction. As such, Project construction would not cause other emissions (such as an odor nuisance), and impacts would be less than significant.

Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding operations (SCAQMD 1993). The Project would not result in the implementation of any such land use. The Project would include the operation of a spray booth. While architectural coatings can produce odors, Project spraying activities would be contained within the spray booth and would not cause an odor nuisance. Therefore, Project operations would result in a less-than-significant odor impact.

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3.4 Biological Resources

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) ***Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?***

Less Than Significant with Mitigation Incorporated. The Project site is located within an urban setting in the Van Nuys area of the City of Los Angeles. A vacant dirt lot with parking areas and overhead lighting structures, pockets of ruderal vegetation, and a few stands of trees occur within the Project site.

According to the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB), four special-status wildlife species have been identified within a 2-mile radius of the Project site: silver-haired bat (*Lasiomycteris noctivagans*; Western Bat Working Group: Medium Priority), hoary bat (*Lasiurus cinereus*; Western Bat Working Group: Medium Priority), Blainville's horned lizard (*Phrynosoma blainvillii*; CDFW Species of Special Concern), and Crotch bumble bee (*Bombus crotchii*; CDFW Special Animal species) (CDFW 2018). None of these species are state or federally listed, nor are there any documented occurrences of special-status species within the Project site itself (CDFW 2018). Additionally, the occurrence for Crotch bumble bee and Blainville's horned lizard are historic dating back to 1936 and 1947, respectively. The silver-haired bat requires a water source and roosts within hollow trees, beneath exfoliating bark, and also uses abandoned woodpecker holes. The hoary bat is also dependent on water and roosts in dense foliage of medium to large trees, primarily feeding on moths. Although these bat species may occasionally forage within the general Project area, they are dependent on a reliable water source for roosting. The closest suitable water source is approximately 2 miles northeast and 2.5 miles southwest of the Project site. Thus, these bat species are unlikely to roost in the scattered trees currently present throughout the Project site. Although the Blainville's horned lizard is known to occur within a wide variety of habitats, this species typically prefers habitats with sandy soils and shrubs to provide cover, which are not present within the Project site. Additionally, the soils are too compacted to be suitable for this species with requires loose soils for burrowing. The Crotch bumble bee is dependent on host plants from the genera *Antirrhinum*, *Phacelia*, *Clarkia*, *Dendromecon*, *Eschscholzia*, and *Eriogonum*. Should plants from these genera occur on site, they would be found in limited numbers, which would be less inviting taking into account the overall disturbances on site and within the surrounding areas. Thus, the Crotch bumble bee is unlikely to occur within the Project site.

No special-status plants are anticipated to occur within the Project site. The Project site is disturbed and subject to routine disturbances associated with disking, mowing, and other vegetation removal activities. There are also no documented occurrences of special-status plant species within a 2-mile radius of the Project site (CDFW 2018). The CNDDDB occurrence report is included as Appendix B.

Based on the developed nature of the surrounding area, wildlife species that could potentially occur on site include common species typically found in urbanized settings, such as house sparrow (*Passer domesticus*), house finch (*Haemorhous mexicanus*), mourning dove (*Zenaidura macroura*), common raven (*Corvus corax*), and western fence lizard (*Sceloporus occidentalis*). Given the existing disturbed nature of the Project site and surrounding area, special-

status species identified as candidate, sensitive, or state- and/or federally listed wildlife or plant species are unlikely to occur on site or within the Project vicinity. Additionally, the Project site is surrounded by predominantly light industrial and commercial development on all sides. Therefore, impacts to candidate, sensitive, or special-status species as identified in local or regional plans, policies, or regulations or by the CDFW or the USFWS would be considered less than significant, and no mitigation is required.

A few mature ornamental landscape trees occur within the Project site, including Canary Island pine (*Pinus canariensis*), shamel ash (*Fraxinus uhdei*), redbox (*Eucalyptus polyanthemos*), sweetgum (*Liquidambar styraciflua*), carrotwood (*Cupaniopsis anacardioides*), California sycamore (*Platanus racemosa*). The majority of the trees are landscaped ornamental trees, and only one of these trees (a California sycamore tree) has been identified as a native species. All trees are proposed to be removed, with the exception of four trees in the southwest corner of the Project site. These trees could potentially provide nesting opportunities for bird species protected under the Migratory Bird Treaty Act of 1918 (16 USC 703–712) and California Fish and Game Code Sections 3503, 3503.5, and 3513. Birds in the area are likely to be susceptible to human presence and loud noise from the frequency of trains passing through the area. Thus, operation of the proposed Project would not produce significant noise or human activity such that birds or raptors would be significantly affected. Nevertheless, impacts to nesting bird and raptor species would be considered potentially significant if implementation of the proposed Project would require removal or substantial trimming of healthy mature trees with active nests during the bird nesting season. Thus, Mitigation Measure MM-BIO-1 is set forth to ensure that nesting birds would not be impacted by the proposed Project activities; and thus, impacts would be less than significant with mitigation incorporated.

MM-BIO-1 Nesting Bird Avoidance: If Project construction occurs during the migratory bird nesting season (typically February 15 through August 31), a pre-construction avian nesting bird survey of the Project site and contiguous habitat area within 300 feet of the site for protected native birds (within 500 feet for raptors) shall be performed by a qualified biologist 72 hours prior to construction in accordance with the Migratory Bird Treaty Act (16 USC 703–712) and California Fish and Game Code Sections 3503, 3503.5, and 3513. If an active bird nest is found, the nest shall be flagged and mapped on the construction plans along with an appropriate no disturbance buffer, which will be determined by the biologist based on the biology of the species (typically 300 feet for passerines and 500 feet for raptor and special-status species). The nest area shall be avoided until the nest is vacated and/or the juveniles have fledged, as determined by a qualified biologist. The nest area shall be demarcated in the field with flagging and stakes or construction fencing. A qualified biologist shall serve as a construction monitor during those periods when construction activities will occur near active nest areas to ensure that no inadvertent impacts to active nests occur.

- b) *Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

No Impact. The Project site is a vacant lot and is dominated by ruderal, non-native grasses and forbs, with very minimal native vegetation and no native vegetation communities occurring. Although the site supports one native California sycamore tree within the far eastern portion of the site, this tree is isolated and within a disturbed area; and therefore, does not constitute as a natural community in itself. All of the other trees within the Project site are ornamental trees, which were most likely planted on site. No riparian vegetation or evidence of water is prevalent within the Project site. Additionally, the Project site is surrounded by light industrial and commercial development, in which adjacent drainages are well-defined, concrete-lined channels, which do not support riparian habitat. As such, no riparian or other sensitive natural vegetation communities occur within the Project site and adjacent areas, and the proposed Project would result in no impact to riparian habitats and/or other sensitive natural communities.

- c) *Would the Project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

No Impact. As discussed under item 3.4(b) above, the Project site does not contain any water courses or riparian areas. The eastern portion of the Project site once contained an abandoned residential dwelling, bunny house, construction equipment, and construction material storage areas for the bioscience laboratory facility, all of which was removed in 2013 prior to LADWP purchasing the property. The site is surrounded by urban development dominated by light industrial and commercial uses. The closest water feature to the Project site is the Pacoima Wash, which is located approximately 450 feet southwest of the Project site and immediately west of Van Nuys Boulevard, south of Covello Street. The Tujunga Wash is also located approximately 0.75 mile east of the Project site. The portion of Pacoima Wash west of Van Nuys Boulevard is an open-air channel, which flows underground through a storm drain at Van Nuys Boulevard to eventually join the Tujunga Wash further to the south. Both the Pacoima Wash and the Tujunga Wash are well-defined, concrete-lined flood control channels that only contain water during select times of the year, and which generally flow from a north to south direction through an urbanized setting. Furthermore, these channels would not be affected by the proposed Project activities. As such, there are no federally or state protected wetlands or other jurisdictional waters on the Project site or in the vicinity that could be affected by implementation of the proposed Project, and no impact would occur.

- d) ***Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?***

No Impact. There are no wetlands, ponding, or flowing waters within the proposed Project site. The Pacoima Wash and Tujunga Wash are the closest channels, which may support flowing water during high rain events, and do not support fish. Therefore, the proposed Project would have no potential to affect the movement of migratory fish. The Project site is located in a heavily urbanized area of the City. While it is highly unlikely that any wildlife species would use the Project area as a wildlife corridor, there are existing linear features in the surrounding area, such as the rail line to the north or Tujunga Wash (a concrete channelized storm drain) to the east, that could theoretically be used as corridors. However, the rail line does not connect to a wildlife area, and Tujunga Wash does not provide the most direct route to natural wildlife areas; thus, these areas, if used, are likely used less often than other more direct wildlife corridors. The proposed Project would not include any off-site improvements that would physically impede the potential use of such nearby linear features by wildlife. Therefore, no impacts associated with wildlife corridors would occur.

- e) ***Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?***

Less Than Significant with Mitigation Incorporated. The City of Los Angeles Protected Tree Ordinance, as modified by Ordinance 177404, provides guidelines for the preservation of Southern California native tree species measuring 4 inches or more in cumulative diameter 4.5 feet above the ground level at the base of the tree (City of Los Angeles 2006). Trees protected under this ordinance include all oak trees indigenous to California (excluding the scrub oak (*Quercus dumosa*)), Southern California black walnut (*Juglans californica* var. *californica*), California sycamore, and California bay (*Umbellularia californica*).

Mature ornamental landscape trees documented within the eastern portion of the Project site include the following: Canary Island pine, shamel ash, redbox, sweetgum, carrotwood, and California sycamore. As per the LADWP Conceptual Design Report (LADWP 2015), California sycamore is the only native tree protected under the City of Los Angeles Protected Tree Ordinance that occurs within the proposed Project site. The single, isolated California sycamore tree is proposed for removal. As such, the proposed Project would result in direct impacts to a tree protected under the City of Los Angeles Protected Tree Ordinance. MM-BIO-2, which requires a tree inventory and obtaining a permit for tree removal, is set forth to minimize impacts to protected trees. Impacts associated with local policies or ordinances protecting biological resources would therefore be less than significant with mitigation incorporated.

MM-BIO-2 All trees should be inventoried within the Project site to determine which trees are “protected trees” pursuant to the City of Los Angeles Protected Tree Ordinance 177404. City of Los Angeles protected trees include all oak trees indigenous to California (excluding the scrub oak (*Quercus dumosa*)), Southern California black walnut (*Juglans californica* var. *californica*), California sycamore (*Platanus racemosa*), and California bay (*Umbellularia californica*). City of Los Angeles protected trees shall not be removed or relocated without having applied for and obtained a permit from the Board of Public Works, its designated officer, or employee pursuant to City of Los Angeles Article 6 (Preservation of Protected Trees) Section 46.02. The application for a permit shall, at a minimum, indicate the following, consistent with Section 46.02, unless otherwise exempted:

1. The location of each protected tree by number on a plot plan;
2. Identification of each protected tree proposed to be retained, relocated, or removed;
3. If grading is proposed that may affect a protected tree, then a copy of the grading permit plan shall also be submitted with the application consistent with Division 70 of Article 1 of Chapter IX of the Tree Protection Ordinance.

Protected Tree Removal Permit. Prior to relocating or removing any City protected tree, including conducting any act that will cause a protected tree to die (i.e., damage to the root system or other part of the tree by fire, application of toxic substances, operation of equipment or machinery, or by changes to the natural grade of the land by excavation or filling the drip line around the trunk), the applicant shall obtain a Protected Tree Removal Permit from the Board of Public Works or its designated officer or employer, pursuant to City of Los Angeles Article 6 (Preservation of Protected Trees) Section 46.02.

All guidelines provided within the tree removal permit must be adhered to during Project activities. Consistent with the City’s ordinance regarding protected tree relocation and replacement requirements, the permittee may be required to do one or more of the following:

1. Replace each protected tree approved for removal or relocation within the property with at least two trees of a protected variety as defined by the City (City of Los Angeles 2006). In accordance with Section 46.02(c)1, each replacement tree shall be at least a 15-gallon, or larger, specimen, measuring 1 inch or more in diameter 1 foot above the base, and be not less than 7 feet in height measured from the base. The size and number of replacement trees shall approximate the value of the tree to be replaced (City of Los Angeles 2006).

2. If replacement trees of the size and species removed or relocated are not available, the Board of Public Works, its authorized officer, or employee may permit protected trees of a lesser size or trees of a different species be planted as replacement trees. However, a greater number of trees may be required.
3. A protected tree may be moved to another location on the property provided that the environmental conditions of the new location are favorable to the survival of the tree and there is a reasonable probability of tree survivorship.

Tree Protection. Protected trees to remain on or within 20 feet of the proposed Project boundary shall be avoided during construction, by the following Best Management Practices, including, but not limited to the following:

1. Establish tree protection zones that include most or all of the root zone and are designed to protect the canopy of each tree to remain on site;
2. Install tree protection fencing, as needed to buffer and avoid protected trees from construction activities; and
3. Perform tree pruning and/or surgery, as needed to enhance the health and structure of remaining protected trees.

f) Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The Project site is not located within any adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved regional, or state habitat conservation plan areas. The County of Los Angeles has established Significant Ecological Areas (SEAs) to preserve a variety of biological communities for public education, research, and other non-disruptive outdoor uses. The proposed Project is not located in an SEA. The nearest SEA is the Verdugo Mountains SEA (incorporated City) approximately 3.3 miles northeast of the Project site (City of Los Angeles 2001). Thus, the proposed Project would not be subject to the provisions of any such conservation plans. Accordingly, implementation of the proposed Project would not conflict with any HCP, NCCP, or other approved local, regional, or state habitat conservation plans, and no impact would occur.

References

16 USC 703–712. Migratory Bird Treaty Act, as amended.

California Fish and Game Code, Sections 3500–3616. Division 4: Birds and Mammals, Part 2: Birds, Chapter 1: General Provisions.

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3.5 Cultural Resources

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

A cultural resources report was prepared for the Project to describe potential effects that could occur to cultural, archaeological, historical, and paleontological resources as a result of the proposed Project. The report is included in this MND as Appendix C. Preparation of the report involved conducting archival research and contacting culturally affiliated groups. The area that was evaluated for the presence of archaeological resources included the entirety of the Project site and a 1-mile buffer surrounding the Project site.

a) *Would the Project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?*

Less-Than-Significant Impact. The records search conducted for the Project determined that while no previously recorded archaeological sites were recorded within the boundaries of the Project area, a total of three

historic structures and one historic district had been previously recorded within the 1-mile buffer surrounding the current Project area.

The most significant previously recorded resource within the current Project's record search results is the Panorama City Historic District. This resource includes 26 residential blocks that were recorded as significant for their association with broad patterns of suburban development during the late 1940s and early 1950s. While this resource is considerable in size and relative complexity, the district is located along the very northern edge of the record search 1-mile buffer area, well outside and north of the current Project area boundaries and would not be affected by the development or operation of the Project. Similarly, the other three historic structures previously recorded within the 1-mile record search buffer area are all far enough away from the current Project area to remain undisturbed by the Project. Therefore, impacts to historic resources would be less than significant.

b) *Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?*

Less Than Significant with Mitigation Incorporated. No archaeological resources have been recorded within the Project area, and only four historic resources have been recorded within the surrounding 1-mile records search buffer. All of these previously recorded resources are well outside of the current Project's boundaries. Additionally, a narrow portion of the current Project area was studied previously with negative results for cultural resources.

It is unlikely that any significant prehistoric Native American resources are present. The Native American Heritage Commission conducted a search of their Sacred Lands file. This search did not indicate the presence of any Native American cultural sites. Nonetheless, despite largely negative findings there is always a possibility to encounter previously unknown buried cultural deposits. If such a deposit or feature were to be encountered, a City-approved archaeological evaluation program would be required to be developed and implemented in order to assess the significance of the resource (as defined by CEQA and the City of Los Angeles). Upon implementation of MM-CUL-1, impacts would be less than significant.

MM-CUL-1 In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the Project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find, the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under the California Environmental Quality Act, additional work such as preparation of an archaeological treatment plan, testing, or data recovery may be warranted.

c) ***Would the Project disturb any human remains, including those interred outside of formal cemeteries?***

Less-Than-Significant Impact. No human remains are expected to be disturbed within the Project site during construction. In the event that remains are unearthed during construction, State Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98 provide guidance with regard to the accidental discovery of human remains. Should remains be unearthed during construction, LADWP would be subject to these requirements by law, reducing any potential impact to less than significant.

3.6 Energy

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) ***Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?***

Less-Than-Significant Impact. The service providers, supply sources, and estimated consumption for electricity, natural gas, and petroleum is discussed below.

Energy Overview

Electricity

LADWP is the utility provider for the City. LADWP provides electric services to 1.5 million customers, located in the City and in the Owens Valley. According to LADWP, customers consumed approximately 24 billion kilowatt-hours (kWh) of electricity in 2016 (CEC 2018). LADWP receives electric power from a variety of sources. According to the LADWP Briefing Book 2017–2018, 29% of LADWP’s power came from renewable energy sources in 2016, including biomass/waste, geothermal, small hydroelectric, solar, and wind sources (LADWP 2017). Due to the state’s energy efficiency building standards and efficiency and conservation programs, California’s electricity use per capita has remained stable for more than 30 years, while the national average has steadily increased (CEC 2015).

Natural Gas

Southern California Gas Company (SoCalGas) serves the City (including the proposed Project area). SoCalGas serves 21.6 million customers in a 20,000-square-mile service area that includes over 500 communities (SoCalGas 2018). In 2016 (the most recent year for which data is available), SoCalGas delivered 5,123 million therms of natural gas, with the majority going to residential uses. Demand for natural gas can vary depending on factors such as weather, price of electricity, the health of the economy, environmental regulations, energy-efficiency programs, and the availability of alternative renewable energy sources. Natural gas is available from a variety of in-state and out-of-state sources and is provided throughout the state in response to market supply and demand.

Petroleum

Transportation accounts for the majority of California's total energy consumption (CEC 2018). According to the EIA, California used approximately 672 million barrels of petroleum in 2016 (EIA 2018). This equates to a daily use of approximately 1.8 million barrels of petroleum. There are 42 U.S. gallons in a barrel, so California consumes approximately 77 million gallons of petroleum per day, adding up to an annual consumption of 28 billion gallons of petroleum. However, technological advances, market trends, consumer behavior, and government policies could result in significant changes in fuel consumption by type and in total. At the federal and state levels, various policies, rules, and regulations have been enacted to improve vehicle fuel efficiency, promote the development and use of alternative fuels, reduce transportation-source air pollutants and GHG emissions, and reduce vehicle miles traveled (VMT).

Construction

Electricity

Temporary electric power for as-necessary lighting and electronic equipment would be provided by LADWP. The amount of electricity used during construction would be minimal, because typical demand would stem from electrically powered hand tools. The electricity used for construction activities would be temporary and minimal; therefore, Project construction would not result in wasteful, inefficient, or unnecessary consumption of electricity. Impacts would be less than significant.

Natural Gas

Natural gas is not anticipated to be required during construction of the Project. Fuels used for construction would primarily consist of diesel and gasoline, which are discussed under the subsection "Petroleum." Any minor amounts of natural gas that may be consumed as a result of Project construction would be temporary and negligible and would not have an adverse effect; therefore, Project construction would not result in wasteful, inefficient, or unnecessary consumption of natural gas. Impacts would be less than significant.

Petroleum

Heavy-duty construction equipment associated with construction activities for construction would rely on diesel fuel, as would vendor trucks involved in delivery of materials to the Project site. Construction workers would travel to and from the Project site throughout the duration of construction. It is assumed in this analysis that construction workers would travel in gasoline-powered light-duty vehicles.

Heavy-duty construction equipment of various types would be used during each phase of Project construction. Appendix A lists the assumed equipment usage for each phase of construction. The Project’s construction equipment is estimated to operate a total combined 101,328 hours.

Fuel consumption from construction equipment was estimated by converting the total carbon dioxide (CO₂) emissions from each construction phase to gallons using the conversion factors for CO₂ to gallons of gasoline or diesel. Construction is estimated to occur in late 2020 through early 2023 based on the construction phasing schedule.

The conversion factor for gasoline is 8.78 kilograms per metric ton CO₂ per gallon, and the conversion factor for diesel is 10.21 kilograms per metric ton CO₂ per gallon (The Climate Registry 2018). The estimated diesel fuel usage from construction equipment is shown in Table 3-15. Worker vehicles are assumed to be gasoline and vendor/hauling vehicles are assumed to be diesel. Calculations for total worker, vendor, and haul truck fuel consumption are provided in Tables 3-16, 3-17, and 3-18.

Table 3-15. Construction Equipment Diesel Demand (Off-Road Equipment)

Phase	Pieces of Equipment	Equipment CO ₂ (MT)	kg/CO ₂ /Gallon	Gallons
Site Preparation	3,438.02	35.10	10.21	
Grading	33,540.88	342.45	10.21	33,540.88
Perimeter Walls Construction	4,401.19	44.94	10.21	4,401.19
Paving & Site Infrastructure	1,470.87	15.02	10.21	1,470.87
Street Improvement of Hazeltine Avenue	22,242.49	227.10	10.21	22,242.49
Architectural Coating	525.15	5.36	10.21	525.15
Trenching & Underground Utilities	941.41	9.61	10.21	941.41
Office Building & Staff Parking	24,550.82	250.66	10.21	24,550.82
Water Distribution Shop and Maintenance Building	24,204.23	247.13	10.21	24,204.23
Department Fleet Vehicles Parking	26,543.43	271.01	10.21	26,543.43
Supply Chain Services Warehouse	23,207.12	236.94	10.21	23,207.12
Fleet Maintenance Building and CNG Dispensing Area	33,766.15	344.75	10.21	33,766.15
Total				198,831.77

Sources: Pieces of equipment and equipment CO₂ (Appendix A); kg/CO₂/Gallon (The Climate Registry 2018).

Notes: CO₂ = carbon dioxide; MT = metric ton; kg = kilogram.

Table 3-16. Construction Worker Gasoline Demand

Phase	Trips	Vehicle MT CO ₂	kg/CO ₂ / Gallon	Gallons
Site Preparation	378	1.93	8.78	219.86
Grading	2,080	10.34	8.78	1,178.18
Perimeter Walls Construction	132	0.65	8.78	74.34
Paving & Site Infrastructure	240	1.19	8.78	135.16
Street Improvement of Hazeltine Avenue	1,728	8.19	8.78	932.26
Architectural Coating	1,848	8.82	8.78	1,004.15
Trenching & Underground Utilities	220	1.09	8.78	123.90
Office Building & Staff Parking	3,510	17.02	8.78	1,938.58
Water Distribution Shop and Maintenance Building	11,424	55.24	8.78	6,291.06
Department Fleet Vehicles Parking	17,748	85.71	8.78	9,762.16
Supply Chain Services Warehouse	7,308	35.29	8.78	4,019.72
Fleet Maintenance Building and CNG Dispensing Area	3,808	18.41	8.78	2,097.03
Total				27,776.38

Sources: Trips and vehicle CO₂ (Appendix A); kg/CO₂/Gallon (The Climate Registry 2018).

Notes: MT = metric ton; CO₂ = carbon dioxide; kg = kilogram.

Table 3-17. Construction Vendor Diesel Demand

Phase	Trips	Vehicle MT CO ₂	kg/CO ₂ / Gallon	Gallons
Site Preparation	42	0.52	10.21	51.10
Grading	260	3.21	10.21	314.29
Perimeter Walls Construction	88	1.08	10.21	106.23
Paving & Site Infrastructure	60	0.74	10.21	72.43
Street Improvement of Hazeltine Avenue	216	2.62	10.21	256.88
Architectural Coating	924	11.29	10.21	1,105.59
Trenching & Underground Utilities	44	0.54	10.21	53.11
Office Building & Staff Parking	2,340	28.70	10.21	2,811.08
Water Distribution Shop and Maintenance Building	5,712	70.01	10.21	6,856.97
Department Fleet Vehicles Parking	1,044	12.79	10.21	1,252.91
Supply Chain Services Warehouse	4,176	51.17	10.21	5,011.65
Fleet Maintenance Building and CNG Dispensing Area	2,380	29.17	10.21	2,857.08
Total				20,749.31

Sources: Trips and vehicle CO₂ (Appendix A); kg/CO₂/Gallon (The Climate Registry 2018).

Notes: MT = metric ton; CO₂ = carbon dioxide; kg = kilogram.

Table 3-18. Construction Haul Truck Diesel Demand

Phase	Trips	Vehicle MT CO ₂	kg/CO ₂ /Gallon	Gallons
Site Preparation	0	0.00	10.21	0.00
Grading	11,118	424.60	10.21	41,586.20
Perimeter Walls Construction	0	0.00	10.21	0.00
Paving & Site Infrastructure	0	0.00	10.21	0.00
Street Improvement of Hazeltine Avenue	4,000	149.43	10.21	14,635.29
Architectural Coating	0	0.00	10.21	0.00
Trenching & Underground Utilities	0	0.00	10.21	0.00
Office Building & Staff Parking	0	0.00	10.21	0.00
Water Distribution Shop and Maintenance Building	0	0.00	10.21	0.00
Department Fleet Vehicles Parking	0	0.00	10.21	0.00
Supply Chain Services Warehouse	0	0.00	10.21	0.00
Fleet Maintenance Building and CNG Dispensing Area	0	0.00	10.21	0.00
Total				56,221.49

Sources: Trips and vehicle CO₂ (Appendix A); kg/CO₂/Gallon (The Climate Registry 2018).

Notes: MT = metric ton; CO₂ = carbon dioxide; kg = kilogram.

In summary, construction of the proposed Project is conservatively anticipated to consume 27,776 gallons of gasoline and 275,803 gallons of diesel over approximately 27 months. By comparison, California’s consumption of petroleum is approximately 74.8 million gallons per day. Based on these assumptions, approximately 61.4 billion gallons of petroleum would be consumed in California over the course of the construction period (EIA 2017). Within Los Angeles County, approximately 11.2 billion gallons of petroleum (gasoline and diesel) would be consumed over the course of the construction period (CARB 2018). Overall, because petroleum use during construction would be temporary and relatively minimal, and would not be wasteful or inefficient, impacts would be less than significant.

Operational

Electricity

Operation of the proposed Project upon buildout would require electricity for multiple purposes, including cooling, lighting, appliances, and various equipment. Additionally, the supply, conveyance, treatment, and distribution of water and wastewater would indirectly result in electricity usage. Electricity consumption associated with Project operation is based on the CalEEMod outputs presented in Appendix A.

CalEEMod default values for energy consumption for each land use were applied for the Project analysis. The energy use from non-residential land uses is calculated in CalEEMod based on the California Commercial End-Use Survey database. Energy use in buildings (both natural gas and electricity) is divided by the program into

end use categories subject to Title 24 requirements (end uses associated with the building envelope, such as the HVAC system, water heating system, and integrated lighting) and those not subject to Title 24 requirements (such as appliances, electronics, and miscellaneous “plug-in” uses).

The proposed Project would be built in accordance with the current Title 24 standards at the time of construction and CALGreen standards. According to these estimations, the Project would consume approximately 4,128,000 kWh per year during operation. For comparison, in 2017 the total residential and non-residential electricity demand in Los Angeles County was 67,569,242,472 kWh (CEC 2018). Therefore, due to the limited amount of electricity use for the proposed Project compared to Los Angeles County consumption, and the inherent increase in efficiency of building code regulations, the proposed Project would not result in a wasteful use of energy. Impacts related to operational electricity use would be less than significant.

Natural Gas

Project operation would require natural gas for various purposes, including water heating and natural gas appliances. Natural gas consumption associated with operation is based on the CalEEMod outputs Appendix A. The proposed Project is subject to statewide mandatory energy requirements as outlined in Title 24, Part 6, of the California Code of Regulations. Prior to Project approval, the applicant would ensure that the proposed Project would meet Title 24 requirements applicable at that time, as required by state regulations through their plan review process. According to these estimations, the proposed Project would consume approximately 3,563,360 kilo-British Thermal Units per year. For comparison, in 2017 the non-residential natural gas use within Los Angeles County was 295,601,223,219 kilo-British Thermal Units (CEC 2018). Therefore, due to the limited amount of natural gas use for the proposed Project compared to Los Angeles County consumption, and the inherent increase in efficiency of building code regulations, the proposed Project would not result in a wasteful use of energy. Impacts related to operational natural gas use would be less than significant.

Petroleum

During operations, the majority of fuel consumption resulting from the proposed Project would involve emergency diesel generators and the use of motor vehicles (i.e., employees) traveling to and from the Project site.

Diesel fuel consumption associated with the emergency diesel generators would be 9,598 gallons per year using the conversion factor for CO₂ to gallons of diesel.

Petroleum fuel consumption associated with motor vehicles traveling to and from the Project site is a function of the VMT as a result of Project operation. As shown in Appendix A (CalEEMod outputs and as discussed in Section 3.3, Air Quality, and Section 3.8, Greenhouse Gas Emissions), the annual VMT attributable to the proposed Project is expected to be 4,860,376 VMT. Similar to the construction worker and vendor trips, fuel consumption from operational trips are estimated by converting the total CO₂ emissions from operation of the proposed Project to gallons using the conversion factors for CO₂ to gallons of gasoline or diesel. Based on the

annual fleet mix provided in CalEEMod, 92.5% of the fleet range from light-duty to medium-duty vehicles and motorcycles are assumed to run on gasoline. The remaining 7.5% of vehicles represent medium-heavy duty to heavy-duty vehicles and buses and are assumed to run on diesel.

Calculations for annual mobile source fuel consumption are provided in Tables 3-19 (gasoline) and 3-20 (diesel).

Table 3-19. Annual Mobile Source Gasoline Demand

	Vehicle MT CO ₂	kg/CO ₂ /Gallon	Gallons
Operation	1,685.76	8.78	192,000.27

Sources: Trips and vehicle CO₂ (Appendix A); kg/CO₂/Gallon (The Climate Registry 2018).

Notes: MT = metric ton; CO₂ = carbon dioxide; kg = kilogram

Table 3-20. Annual Mobile Source Diesel Demand

	Vehicle MT CO ₂	kg/CO ₂ /Gallon	Gallons
Operation	137.05	10.21	13,423.28

Sources: Trips and vehicle CO₂ (Appendix A); kg/CO₂/Gallon (The Climate Registry 2018).

Notes: MT = metric ton; CO₂ = carbon dioxide; kg = kilogram

Over the lifetime of the proposed Project, the fuel efficiency of the vehicles being used by the employees is expected to increase. As such, the amount of petroleum consumed as a result of vehicular trips to and from the Project site during operation would decrease over time. There are numerous regulations in place that require and encourage increased fuel efficiency. For example, CARB has adopted an approach to passenger vehicles by combining the control of smog-causing pollutants and GHG emissions into a single, coordinated package of standards. The approach also includes efforts to support and accelerate the number of plug-in hybrids and zero-emissions vehicles in California (CARB 2017). Additionally, in response to Senate Bill 375, CARB adopted the goal of reducing per-capita GHG emissions from 2005 levels by 8% by 2020, and 13% by 2035 for light-duty passenger vehicles in the planning area for the Southern California Association of Governments. The Southern California Association of Governments' *2016–2040 Regional Transportation Plan/ Sustainable Communities Strategy* quantified an 8% reduction of petroleum use by 2020 and an 18% reduction by 2030 (SCAG 2016). As such, operation of the Project is expected to use decreasing amounts of petroleum over time due to advances in fuel economy.

In summary, although natural gas and electricity usage would increase due to the implementation of the Project, the Project's energy efficiency would be in accordance with state Title 24 standards. Although the Project would see an increase in petroleum use during construction and operation, vehicles would use less petroleum due to advances in fuel economy and potential reduction in VMT over time. Given these considerations, petroleum consumption associated with the proposed Project would not be considered inefficient or wasteful and would result in a less than significant impact.

b) *Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

Less-Than-Significant Impact. The Project would follow applicable energy standards and regulations during the construction phases. The proposed Project would be subject to and would comply with, at a minimum, the California Building Code Title 24 (24 CCR, Part 6) applicable at the time of development. Additionally, the Project would consolidate and replace the existing LADWP Water System divisions with modern facilities with increased energy efficiency, due to more stringent energy conservation regulations. Based on these considerations, proposed Project would not conflict with existing energy standards and regulations; therefore, impacts during construction and operation of the proposed Project would be **less than significant**.

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The Climate Registry. 2018.

3.7 Geology and Soils

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) *Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:*

i) *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*

No Impact. The Project site is not located within an Earthquake Fault Zone, formerly known as an Alquist–Priolo Earthquake Fault Zone, and is not traversed by any known active faults. The nearest active fault to the Project site, as identified by the City of Los Angeles, is the Northridge fault, located approximately 3.4 miles from the Project site (City of Los Angeles 1996). Fault rupture is not expected to occur on the Project site. No impact would occur.

ii) *Strong seismic ground shaking?*

Less-Than-Significant Impact. As with all areas in Southern California, the Project site is located in a seismically active region, within which are numerous known earthquake faults. As with most areas throughout Southern California, the site could be exposed to strong seismic ground shaking. As stated in Section 3.7(a)(i), the Northridge fault is approximately 3.4 miles from the Project. According to the City of Los Angeles General Plan Safety Element, the Northridge fault is a blind thrust fault, of which have increasingly become the focus of study and concern. The concept of blind thrust faults has been recognized only recently by seismologists. The effect of such faults may dominate the geology of the Los Angeles basin in a way not previously known (City of Los Angeles 1996). As a response, the City adopted a series policies within the Los Angeles City Building Code, which required retrofitting of certain existing structures (e.g., foundation anchoring of hillside dwellings) and for new construction, as well as an ordinance which required evaluation of structures by a structural engineer during the construction process (City of Los Angeles 1996). Project structures would be designed and constructed in accordance with the latest version of the California Building Code and the City of Los Angeles Building Code relative to seismic criteria, and neither people nor structures would be exposed to potential substantial adverse effects. Direct and indirect impacts would be less than significant.

iii) *Seismic-related ground failure, including liquefaction?*

Less-Than-Significant Impact. The Project site has not been identified as being potentially susceptible to liquefaction (City of Los Angeles 2017). As discussed in Section 3.7(a)(ii), the Project site has the potential to be exposed to strong seismic ground shaking, and in some cases, seismic-related ground failure. However, Project structures would be designed and constructed in accordance with the latest version of the California Building Code and the City of Los Angeles Building Code

relative to seismic criteria, which provides a measure of safety for people and structures exposed to potential substantial adverse effects involving seismic-related ground shaking. Direct and indirect impacts would be less than significant.

iv) Landslides?

No Impact. The Project site and surrounding area are flat, and the site has not been mapped as a landslide hazards area (City of Los Angeles 2017). Therefore, people or structures on the site would not be exposed to landslide hazards. No impact would occur.

b) Would the Project result in substantial soil erosion or the loss of topsoil?

Less-Than-Significant Impact. Construction of the Project would result in ground surface disruption during grading and excavation that could create the potential for erosion to occur. Because the Project would involve construction on an area greater than 1 acre, it would require compliance with the Storm Water Construction Activities General Permit, which requires the construction contractor to prepare and comply with an SWPPP. The SWPPP must include erosion control measures such as covering exposed soil stockpiles, protecting the perimeter of the construction site with sediment barriers, and protecting storm drain inlets.

Once operational, the Project site would be developed with water facility buildings, paved parking areas and drive aisles, and landscape areas. Collectively, these on-site areas would reduce the potential for soil erosion and topsoil loss. The structural and paved improvements would be impervious areas lacking any exposed soils. The landscape areas, although pervious, would contain various trees, shrubs, and groundcover that would help stabilize any surface soils and contain these soils to the Project site. As such, impacts associated with soil erosion and loss of topsoil would be less than significant.

c) Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Less-Than-Significant Impact. The Project site is not located in an area identified for landslide or liquefaction hazards (City of Los Angeles 2017). The new water yard facilities that would be installed on the Project site would be designed and constructed in accordance with the latest version of the California Building Code and the City of Los Angeles Building Code relative to seismic criteria. Compliance with the current regulations would ensure that Project structures are designed and built to current standards to minimize any potential impacts and hazards associated with unstable soils. This impact would be less than significant.

- d) *Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*

Less-Than-Significant Impact. As described above under Section 3.7(c), the California Building Code and the City of Los Angeles Building Code outline specific design, engineering, and development standards for structures proposed in areas with unstable soils. In the unlikely event that such soils are encountered on the Project site, compliance with these regulations would ensure that Project structures are designed and engineered to withstand on-site soil conditions. Direct and indirect impacts would therefore be less than significant.

- e) *Would the Project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?*

No Impact. The Project does not include installation of septic tanks or alternative wastewater disposal systems. During Project operation, the Project would connect to the City sewer system. As such, no impact would occur relative to the ability of on-site soils to support septic tanks or alternative wastewater disposal systems.

- f) *Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

Less Than Significant with Mitigation Incorporated. Paleontological resources include fossil plants and animals and other evidence of past life, such as trace fossils and tracks.

According to the Surface Soil and Soil Gas Sampling Report prepared for this Project (Appendix D), the Project site is mapped by the state as underlain by young alluvial fan deposits generated by the Pacoima and Tujunga Washes, which originate in the adjacent San Gabriel Mountains. However, approximately 2.5 feet to 7.5 feet of undocumented artificial fill was found to be overlaying the alluvial deposits of the Project site (Appendix D). Therefore, the possibility of a paleontological discovery cannot be discounted. Accordingly, destruction of paleontological resources or unique geologic features during site-disturbing activities associated with construction of the proposed Project is considered a potentially significant impact. Therefore, MM-GEO-1 is provided and would be implemented to ensure that potential impacts to paleontological resources or unique geologic features during construction activities are reduced to a less-than-significant level.

MM-GEO-1 In the event that paleontological resources (fossil remains) are exposed during construction activities for the Project, all construction work occurring within 50 feet of the find shall immediately stop until a qualified paleontologist, as defined by the Society of Vertebrate Paleontology's 2010 guidelines, can assess the nature and importance of the find. Depending on the significance of the find, the paleontologist may record the find and allow work to continue or recommend salvage and recovery of the resource. All recommendations will be made in accordance with the Society of Vertebrate Paleontology's 2010 guidelines, and shall

be subject to review and approval by the City of Los Angeles. Work in the area of the find may only resume upon approval of a qualified paleontologist.

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3.8 Greenhouse Gas Emissions

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The analysis in this section is partially based on the CalEEMod GHG emissions estimates provided in Appendix A and the stationary source emissions calculations in the May 2019 HRA prepared for this Project and included in Appendix A.

a) *Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

Less-Than-Significant Impact. GHGs are gases that absorb infrared radiation in the atmosphere. The greenhouse effect is a natural process that contributes to regulating the Earth’s temperature. If the atmospheric concentrations of GHGs rise, the average temperature of the lower atmosphere will gradually increase. The effect each GHG has on climate change is measured as a combination of the mass of its emissions and the potential of a gas or aerosol to trap heat in the atmosphere, known as its global warming potential (GWP), which varies among GHGs. Total GHG

emissions are expressed as a function of how much warming would be caused by the same mass of CO₂. Thus, GHG emissions are typically measured in terms of pounds or metric tons (MT) of carbon dioxide equivalent (CO₂e)⁶.

Global climate change is a cumulative impact; a project participates in this potential impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. There are currently no established thresholds for assessing whether the GHG emissions of a project in the SCAQMD are significant. While the Project would result in emissions of GHGs during construction and operation, no guidance exists to indicate what level of GHG emissions would be considered substantial enough to result in a significant adverse impact on global climate change. However, it is generally believed that an individual project is of insufficient magnitude by itself to influence climate change or result in a substantial contribution to the global GHG inventory, as scientific uncertainty regarding the significance of a project's individual and cumulative effects on global climate change remains.

Thus, GHG impacts are recognized as exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective (CAPCOA 2008). This approach is consistent with that recommended by the California Natural Resources Agency (CNRA), which noted in its public notice for the proposed CEQA amendments that the evidence before it indicates that, in most cases, the impact of GHG emissions should be considered in the context of a cumulative impact, rather than a project-level impact (CNRA 2009a). Similarly, the CNRA's Final Statement of Reasons for Regulatory Action on the CEQA Amendments confirm that an EIR or other environmental document must analyze the incremental contribution of a project to GHG levels and determine whether those emissions are cumulatively considerable (CNRA 2009b). Accordingly, further discussion of the Project's GHG emissions and their impact on global climate are addressed below.

Status of SCAQMD Thresholds. The SCAQMD has not adopted recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of residential and commercial development projects. In October 2008, SCAQMD presented to the Governing Board the *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold* (SCAQMD 2008). This document, which builds on the previous guidance prepared by the California Air Pollution Control Officers Association, explored various approaches for establishing a significance threshold for GHG emissions. The draft interim CEQA thresholds guidance document was not adopted or approved by the Governing Board. However, in December 2008, the SCAQMD adopted an interim 10,000 MT CO₂e per-year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency (see SCAQMD Resolution No. 08-35, December 5, 2008). The 10,000 MT CO₂e per-

⁶ The CO₂ equivalent for a gas is derived by multiplying the mass of the gas by the associated GWP, such that metric tons of CO₂e = (metric tons of a GHG) × (GWP of the GHG). This analysis assumes the GWP of methane is 25 and the GWP of nitrous oxide is 298 consistent with default values in CalEEMod 2016.

year threshold was based upon the conclusion that the 10,000 MT CO₂e per-year threshold was consistent with achieving an emission capture rate of 90% of all new or modified stationary source projects, which in turn uses Executive Order S-3-05 as the basis for deriving the screening level.

The SCAQMD formed a GHG CEQA Significance Threshold Working Group to work with SCAQMD staff on developing GHG CEQA significance thresholds until statewide significance thresholds or guidelines are established. From December 2008 to September 2010, the SCAQMD hosted working group meetings and revised the draft threshold proposal several times, although it did not officially provide these proposals in a subsequent document. The SCAQMD has continued to consider adoption of significance thresholds for residential and general land use development projects. The most recent proposal, issued in September 2010, uses the following tiered approach to evaluate potential GHG impacts from various uses (SCAQMD 2010):

- Tier 1** Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.
- Tier 2** Consider whether or not the proposed project is consistent with a locally adopted GHG reduction plan that has gone through public hearing and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.
- Tier 3** Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 MT CO₂e per-year threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 MT CO₂e per year), commercial projects (1,400 MT CO₂e per year), and mixed-use projects (3,000 MT CO₂e per year). Under option 2, a single numerical screening threshold of 3,000 MT CO₂e per year would be used for all non-industrial projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.
- Tier 4** Consider whether the project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of Assembly Bill (AB) 32 to reduce statewide GHG emissions to 1990 levels by 2020. The 2020 efficiency targets are 4.8 MT CO₂e per-service population for project-level analyses and 6.6 MT CO₂e per-service population for plan-level analyses. If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.
- Tier 5** Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.

The lead agency has determined that the Project’s GHG emissions will be compared to the industrial quantitative threshold of 10,000 MT CO_{2e} per year. The SCAQMD *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold* (SCAQMD 2008) recommends that “construction emissions be amortized over a 30-year project lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies.” Thus, the total construction GHG emissions were calculated, amortized over 30 years, and added to the total operational emissions for comparison with the GHG significance threshold of 10,000 MT CO_{2e} per year. The determination of significance, therefore, is addressed in the operational emissions discussion following the estimated construction emissions.

Construction GHG Emissions. Construction of the Project would result in GHG emissions primarily associated with the use of off-road construction equipment, on-road hauling and vendor trucks, and worker vehicles. Construction of the proposed Project would begin in November 2020 and would be completed in January 2023.

CalEEMod Version 2016.3.2 was used to calculate the annual GHG emissions based on the construction scenario described in Section 2.3, Construction. The GHG emissions are expressed in units of MT CO_{2e}. On-site sources of GHG emissions include off-road equipment, and off-site sources include vendor trucks, haul trucks, and worker vehicles. Table 3-21 presents construction GHG emissions for the Project from on-site and off-site emissions sources.

Table 3-21. Estimated Annual Construction GHG Emissions – Unmitigated

Year	CO ₂	CH ₄	N ₂ O	CO _{2e}
	Metric Tons per Year			
2020	176.39	0.04	0.00	177.30
2021	1,368.81	0.25	0.00	1,375.04
2022	1,440.35	0.25	0.00	1,446.58
2023	74.28	0.01	0.00	74.63
Total	3,059.82	0.55	0.00	3,073.55

Source: See Appendix A for complete results.

Notes: GHG = greenhouse gas; CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrous oxide; CO_{2e} = carbon dioxide equivalent.

As shown in Table 3-21, the estimated total GHG emissions during construction of the Project would be approximately 3,074 MT CO_{2e}. Estimated Project-generated construction emissions amortized over 30 years would be approximately 102 MT CO_{2e} per year. As with Project-generated construction criteria air pollutant emissions, GHG emissions generated during construction of the Project would be short term, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions.

Operational GHG Emissions. In general, operational GHG emissions are generated through mobile sources (motor vehicle trips to Project land uses); energy use (natural gas and electricity consumed by the Project); area

sources (consumer product use, architectural coatings, and landscape maintenance equipment); stationary sources, forklifts; and water treatment, distribution, and supply. GHG emissions associated with mobile, area, and energy sources associated with the Project were estimated using CalEEMod (Appendix A). Project buildout was assumed to occur in 2026.

Area and energy source emissions were estimated to be consistent with the analysis in Section 3.3, Air Quality. Default CalEEMod factors for indoor and outdoor water supply and solid waste were used to estimate GHG emissions for Project buildout.

Mobile source emissions were estimated using the assumptions described in Section 3.3, Air Quality. CalEEMod default data for temperature, variable start information, and emission factors were conservatively assumed for the model inputs. Project-related traffic was assumed to consist of a mixture of vehicles in accordance with the model outputs for traffic. Emission factors representing the vehicle mix and emissions for 2026 were used to represent the first full year of operation under the proposed Project.

CalEEMod was also used to calculate emissions associated with forklift operation. It was assumed that 10 forklifts would operate on site for 4 hours a day. Exterior forklifts would be powered by diesel and were assumed to operate at 89 horsepower.

The proposed Project would also include the following stationary sources:

- One paint spray booths that would be collocated in the southern portion of the site;
- A CNG fueling station that would be located in the southeastern portion of the site, with a dispenser located to the east of the internal roadway; and
- Four emergency generators that would be located in four different locations, specifically immediately north of the weld shop, in the Meter Yard, north of Supply Chain Services, and near the parking structure.

The HRA prepared for this Project calculated the GHG emissions associated with these stationary sources and forklifts.

The four Tier 2 diesel emergency generators would be permitted to operate up to 50 hours per year for maintenance and testing purposes under the statewide Airborne Toxics Control Measure regulation (17 CCR 93115).

Two scenarios were modeled to determine annual GHG emissions: maintenance and testing. The maintenance maximum fuel usage (i.e., input load factor) would vary depending on engine size and would range between 27% and 29% of maximum fuel consumption. The engine load factor was assumed to be 25%. Testing emissions were calculated assuming a 100% load factor. Maintenance and testing GHG emissions associated with all four emergency generators are included in Table 3-22.

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Estimated operational GHG emissions from electricity usage, mobile sources, area sources, water consumption, wastewater treatment, and solid waste generation associated with the Project are shown in Table 3-22.

Table 3-22. Estimated Annual Operational GHG Emissions (2026) – Unmitigated

Emissions Source	CO ₂	CH ₄	N ₂ O	CO ₂ E
	<i>Metric Tons per Year (Unmitigated)</i>			
Area	0.02	<0.01	0.00	0.02
Energy	1,609.76	0.04	0.01	1,613.96
Mobile	1,820.80	0.08	0.00	1,822.81
Forklifts	87.73	0.03	0.00	88.44
Solid waste	65.81	3.89	0.00	163.05
Water supply and wastewater	359.51	2.23	0.05	431.55
Emergency generator maintenance and testing	-	-	-	98.00
Combined total emissions				4,217.83
<i>Amortized construction emissions</i>				<i>102.45</i>
Operation + amortized construction total				4,320.28

Notes: Calculations provided in Appendix A. A dash (—) represents information that is not available. GHG = greenhouse gas; CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrous oxide; CO₂e = carbon dioxide equivalent.

As shown in Table 3-22, the estimated annual operational and amortized construction GHG emissions would be 4,320 MT CO₂e per year. Mobile emissions would be the primary source of GHG emissions generated under the Project. The Project would not exceed the SCAQMD draft threshold for industrial projects of 10,000 MT CO₂e per year. Therefore, impacts would be less than significant.

b) *Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Less-Than-Significant Impact. The Climate Change Scoping Plan, approved by CARB on December 12, 2008, provides a framework for actions to reduce California’s GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. As such, the Scoping Plan is not directly applicable to specific projects. Moreover, the Final Statement of Reasons for the amendments to the CEQA Guidelines reiterates from the Initial Statement of Reasons that “[t]he Scoping Plan may not be appropriate for use in determining the significance of individual projects because it is conceptual at this stage and relies on the future development of regulations to implement the strategies identified in the Scoping Plan” (CNRA 2009b). Under the Scoping Plan, however, there are several state regulatory measures aimed at the identification and reduction of GHG emissions. CARB and other state agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage, high-GWP GHGs in consumer products) and changes to the vehicle fleet (hybrid, electric, and more fuel-efficient vehicles) and associated fuels, among others.

Regarding consistency with Senate Bill 32 (goal of reducing GHG emissions to 40% below 1990 levels by 2030) and Executive Order S-3-05 (goal of reducing GHG emissions to 80% below 1990 levels by 2050), there are no established protocols or thresholds of significance for that future-year analysis. However, CARB forecasts that compliance with the current Scoping Plan puts the state on a trajectory of meeting these long-term GHG goals, although the specific path to compliance is unknown (CARB 2014). As discussed previously, the proposed Project would result in less-than-significant GHG emissions and would not conflict with the state's trajectory toward future GHG reductions. In addition, since the specific path to compliance for the state in regards to the long-term goals will likely require development of technology or other changes that are not currently known or available, specific additional mitigation measures for the proposed Project would be speculative and cannot be identified at this time. With respect to future GHG targets under Senate Bill 32 and Executive Order S-3-05, CARB has also made clear its legal interpretation that it has the requisite authority to adopt whatever regulations are necessary, beyond the AB 32 horizon year of 2020, to meet the reduction targets in 2030 and in 2050; this legal interpretation by an expert agency provides evidence that future regulations will be adopted to continue the state on its trajectory toward meeting these future GHG targets.

The City of Los Angeles has established a Climate Action Plan that establishes the goal of reducing City GHGs by to 35% below 1990 levels by 2030 (City of Los Angeles 2007). Notably, the Project would consolidate and replace the existing LADWP Water System divisions with modern facilities with increased energy efficiency, due to more stringent energy conservation regulations. Furthermore, by consolidating LADWP Water System divisions onto one site, and modernizing water facilities to respond to a significant natural disaster, the Project would not conflict with the Executive Order's near-term 2020 goal (as codified in AB 32), the long-term 2050 goal, or the City's Climate Action Plan.

Based on the preceding considerations, the Project would not conflict with any applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Therefore, this cumulative impact would be less than significant.

References

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SCAQMD. 2010. Greenhouse Gas CEQA Significance Threshold Stakeholder Working Group Meeting #15. September 28, 2010. [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-main-presentation.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-main-presentation.pdf?sfvrsn=2).

3.9 Hazards and Hazardous Materials

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The analysis in this section is based on a *Surface Soil and Soil Gas Sampling Report* for the Project site, which is included as Appendix D.

- a) ***Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?***

Construction Impacts

Less Than Significant with Mitigation Incorporated. Construction of the Project would include activities involving some hazardous materials, including on-site fueling and minor servicing of construction equipment. However, construction activities would be short-term in nature, and the types of materials that would be involved are not considered acutely hazardous. Furthermore, the handling of these materials is subject to federal, state, and local health and safety requirements. However, in order to ensure that reasonably foreseeable and accident conditions are addressed and sufficiently responded to, MM-HAZ-1, as described in full below, is provided and would be implemented to ensure potential impacts during construction are reduced to a less-than-significant level.

Operations Impacts

Less-Than-Significant Impact. Long-term operation of the Project would involve the transport, use, and disposal of materials that could be potentially hazardous. Chemicals that are considered to be hazardous materials would be regulated at the federal and state level. Workers would be required to follow state and federal laws governing the handling, storage, and transport of these chemicals.

While several types of hazardous materials would be involved with operation of the proposed Project, compliance with the existing laws regulating these substances would ensure that they are handled properly and that spills are contained and addressed in a safe manner in the unlikely event that a spill were to occur. For these reasons, impacts related to the routine use, transport, and disposal of hazardous materials associated with operations would be less than significant.

MM-HAZ-1 A Site Mitigation Plan (SMP) shall be developed and implemented during all construction activities. The SMP would also include a hazardous substance management, handling, storage, disposal, and emergency response plan that establishes procedures for managing any hazardous substance releases on the Project site. Hazardous materials spill kits would be maintained on site to effectively manage and clean any small accidental spills. In addition, the SMP would include strategies for identification and management of contaminated soil, if encountered during Project development, and would outline Mitigation Measures if development activities result in an accidental release of contaminants. A Project-specific Health and Safety Plan shall be prepared in accordance with the Occupational Safety and Health Administration standards, included in the SMP, and implemented during all construction-related activities. Copies of the SMP and Health and Safety Plan shall be maintained on site during demolition, excavation, and construction of the Project. All workers on the Project site should be familiar with these documents.

- b) ***Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?***

Construction Impacts

Less Than Significant with Mitigation Incorporated. Construction of the Project would include activities involving some hazardous materials, including on-site fueling and minor servicing of construction equipment. However, construction activities would be short term in nature, and the types of materials that would be involved are not considered acutely hazardous. Furthermore, the handling of these materials is subject to federal, state, and local health and safety requirements. However, in order to ensure that reasonably foreseeable and accident conditions are addressed and sufficiently responded to, MM-HAZ-1 is provided and would be implemented to ensure potential impacts during construction are reduced to a less-than-significant level.

Operations Impacts

Less-Than-Significant Impact. As described under Section 3.9(a), several hazardous materials would be used during operation of the Project. In the unlikely event that these materials were to be accidentally released to the environment during Project operation, they could pose a hazard to the public and to the environment. However, the substances would be handled in accordance with state and federal laws governing the storage, use, transport, and disposal of such materials. Any release of hazardous materials would be handled in a manner that would not pose a significant hazard to the public or the environment. As such, impacts related to an accidental release of hazardous materials into the environment are less than significant.

- c) ***Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?***

No Impact. The nearest schools to the Project site are Panorama High School, located 0.5 mile northwest from the Project site; Fulton Middle School, located 0.8 mile west of the Project site; Pinecrest School, located 0.4 miles south of the Project site, Hazeltine Avenue Elementary School, located 0.5 mile south of the Project site; Ranchito Elementary School, located 0.4 mile northeast of the Project site; and Burton Street Elementary School, located 0.6 mile north of the Project site. As such, the Project would not be located within a quarter mile of an existing or proposed school. No impact would occur.

- d) ***Would the Project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?***

Less Than Significant with Mitigation Incorporated. Government Code Section 65962.5 applies to facilities that may be subject to the Resource Conservation and Recovery Act Corrective Action program involving the cleanup of improperly managed hazardous wastes. The Project site is not contained on any lists compiled pursuant to Section 65962.5 or on the California Department of Toxic Substances Control database (EnviroStor) for contaminated sites (DTSC 2017a, 2017b).

Additionally, according to the Surface Soil and Soil Gas Sampling Report prepared for the Project (Appendix D), the following conclusions were made based on the results of the previously prepared Phase I Environmental Site Assessments and Screening Level Phase II Investigation.

The soil vapor data do not suggest a significant release has occurred at the site that would require mitigation for commercial development. Soil sample data suggest metals are not present at concentrations indicative of environmental impact and generally are consistent with typical background concentrations. The few low concentrations of VOCs and relatively low and heavier end hydrocarbons detected in shallow soil do not suggest significant impacts are present in the areas investigated (AMEC 2012).

The following conclusions were made based on the Surface Soil and Soil Gas Sampling Report prepared for the Project (Appendix D):

- Concentrations of Title 22 metals and semivolatile organic compounds in soil are below the EPA's, Pacific Southwest Region 9, Regional Screening Levels developed for a commercial/industrial scenario.
- Concentrations of Organochlorine Pesticides in soil are below the California Environmental Protection Agency (Cal/EPA), OEHHA, residential and commercial/industrial California Human Health Screening Levels (CHHSLs), with the exception of toxaphene detected in one sample (B16-3'; 2,400 micrograms per kilogram), which exceeded the commercial/industrial CHHSL of 1,800 micrograms per kilogram.
- Concentrations of Total Petroleum Hydrocarbons (TPH) detected in soil are below the Los Angeles California Regional Water Quality Control Board's maximum soil screening levels above drinking water aquifers greater than 150 feet below ground surface (Table 4-1 in LARWQCB 1996, as cited in Appendix D) for TPH as gasoline (1,000 milligrams per kilogram (mg/kg)), TPH as diesel (10,000 mg/kg), and TPH as motor oil (50,000 mg/kg).
- Concentrations of VOCs detected in soil gas are below the Cal/EPA (2010, as cited in Appendix D) CHHSLs for shallow soil gas (engineered fill) in a commercial/industrial land use scenario, for carbon tetrachloride (0.21 micrograms per liter ($\mu\text{g/L}$)), Tetrachloroethylene (1.6 $\mu\text{g/L}$), and Trichloroethylene (4.4 $\mu\text{g/L}$). No CHHSLs are documented by Cal/EPA for the VOCs 1,1-dichloroethene, Freon 113, and chloroform in soil gas.

Based on analytical data and the findings of the Surface Soil and Soil Gas Sampling Report (Appendix D), additional assessment work is not warranted. However, any unknown subsurface structures or potentially contaminated soil encountered during site demolition and construction should be investigated for potential hazardous substances impacts to the property. Additional assessment around sample location B16 at 3 feet below ground surface (B16-3'), located at the eastern edge of the Project site may be warranted in order to define the lateral and vertical extent of Organochlorine Pesticide (toxaphene) impacts in the area as necessary, and where disturbance of shallow soil in that area is anticipated during any site redevelopment activities.

Therefore, in order to ensure that reasonably foreseeable and accident conditions are addressed and sufficiently responded to, MM-HAZ-1 is provided and would be implemented to ensure potential impacts during construction are reduced to a less-than-significant level.

- e) *For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?*

Less-Than-Significant Impact. The Van Nuys Regional Airport is located approximately 2.5 miles to the west; Whiteman Airport is located approximately 3.7 miles to the north; and Bob Hope Burbank Airport is located approximately 4 miles to the east of the Project site. However, the Project site is not located within the

Airport Influence Areas of any of these or any other airports. Therefore, the Project would not expose people working or residing in the Project area to hazards from airports or aircraft. Impacts associated with Project implementation would be less than significant.

f) Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. The Project would be located within a vacant site, which is generally surrounded by industrial and commercial uses. Access to the site would be provided via two existing roadways: Tyrone Avenue and Hazeltine Avenue. No permanent or temporary street closures are planned during either Project construction or operations. Emergency access to or egress from the Project site or surrounding areas would not be adversely affected. As such, development of the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and no impact would occur.

g) Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less-Than-Significant Impact. According to the *City of Los Angeles General Plan Safety Element*, no wildland fire hazard areas occur within the Project site or near the Project site (City of Los Angeles 1996). No construction or operational activity related to the Project would create a significant risk related to wildland fire. However, the Project is identified as an industrialized area in the *City of Los Angeles General Plan Safety Element*, which is a selected urban fire and secondary hazards area (City of Los Angeles 1996). The Project would comply with the 2017 Los Angeles Fire Code, which is a component to the LAMC and is a combination of the California Fire Code and the Los Angeles Amendments (City of Los Angeles 2019). In addition, as discussed in Section 3.9(g); the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. As such, impacts would be less than significant.

References

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LARWQCB (Los Angeles Regional Water Quality Control Board). 1996. "Table 4-1: Maximum Soil Screening Levels (mg/kg) for TPH and BTEX above Drinking Water Aquifers." In *Interim Site Assessment and Cleanup Guidebook*. California Regional Water Quality Control Board, Los Angeles and Ventura Counties. May 1996. Accessed January 2019. http://www.swrcb.ca.gov/rwqcb4/water_issues/programs/remediation/VOC/RBs1996GuideBook1_1.pdf.

3.10 Hydrology and Water Quality

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: (i) result in substantial erosion or siltation on- or off-site; (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site; (iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or (iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) *Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?*

Short-Term Construction Impacts

Less-Than-Significant Impact. Without the appropriate controls in place, stormwater that is allowed to flow off site can potentially convey various sediments, pollutants, trash, and other constituents downstream, which subsequently adversely affects water quality of receiving waters. To reduce the potential for downstream water quality impacts, the proposed Project would comply with Municipal Code Chapter VI, Article 4.4, Section 64.70, (City of Los Angeles 2012), which states that refuse, rubbish, garbage, leaves, dirt, or other landscape debris shall be contained on the building site. The Project site is greater than 1 acre and would be subject to National Pollutant Discharge Elimination System (NPDES) Construction General Permit requirements. Under the NPDES Construction General Permit program, SWPPPs are prepared and the best management practices (BMPs) identified in the SWPPPs are implemented for construction sites greater than 1 acre to reduce the occurrence of pollutants in surface water. In compliance with applicable construction permits, the proposed Project would implement BMPs that minimize disturbance, protect slopes, reduce erosion, and limit or prevent various pollutants from entering surface water runoff. City-wide Low Impact Development (LID) Ordinance provides a set of BMPs that are intended to be inclusive of, and potentially exceed, Standard Urban Stormwater Mitigation Plan⁷ (SUSMP) standards, apply to existing as well as new development, and emphasize natural drainage features and groundwater recharge in addition to pollution prevention in receiving waters. The LID Ordinance requires the capture and management of the first three quarters of an inch of runoff flow during storm events defined in the City’s SUSMP BMPs, through one or more of the City’s preferred SUSMP improvements: on-site infiltration, capture and reuse, or biofiltration/biotreatment BMPs, to the maximum extent feasible.

⁷ To obtain coverage under a Municipal NPDES Permit, a developer must obtain approval of a project-specific SUSMP from the appropriate Permittee. A SUSMP addresses the discharge of pollutants within stormwater generated following new construction or redevelopment. Under recent regulations adopted by the LARWQCB, projects are required to implement a SUSMP during the operational life of a project to ensure that stormwater quantity and quality are addressed by incorporating BMPs into project design.

The Proposed Project is within the San Fernando Basin (SFB), which is the major groundwater basin in Upper Los Angeles River Area. The SFB is regulated under the larger Los Angeles Regional Water Quality Control Board (LARWQCB) Basin Plan (State Water Board 2014). The LARWQCB Basin Plan provides regulation for the protection of surface water and groundwater quality within the Basin Plan area. The SFB contains trace levels of the contaminants trichloroethylene, perchloroethylene, and other VOCs were detected in the past (LADWP 2011). The presence of these contaminants is due to improper chemical disposal practices historically conducted by numerous companies in the San Fernando Valley utilizing such materials. While LADWP is permitted to withdraw its allotted entitlement of 87,000 AFY from the SFB including a portion of its additional stored water, 2007 was the first year LADWP was unable to pump its allotted entitlement due to contamination impacts (LADWP 2011).

Construction of the Project would result in ground surface disruption during grading and excavation reaching up to 3 feet in depth. Non-stormwater discharges during construction would include periodic application of water for dust control. Water applied for dust control would either quickly evaporate or locally infiltrate into shallow surface soils. This means that water applied for dust control is unlikely to appreciably affect groundwater or surface water features, and thus would have little to no potential to cause or contribute to exceedances of water quality objectives contained in the Basin Plan. Therefore, short-term construction impacts associated with water quality standards would be less than significant.

Long-Term Operational Impacts

Less-Than-Significant Impact. Once operational, the Project site would be entirely improved with water facility buildings, paved parking spaces and laydown areas, and landscape areas. Collectively, these on-site areas would reduce the potential for soils erosion and topsoil loss. The structural and paved improvements would cover impervious areas lacking any exposed soils. The landscape areas, although pervious, would contain various trees, shrubs, and groundcover that would help to stabilize any surface soils while also helping to contain these soils to the Project site.

The Project would comply with Municipal Code Chapter VI, Article 4.4, Section 64.70, the City of Los Angeles Low Impact Development Ordinance, which requires redevelopment projects that alter more than 50% of the impervious surfaces of the existing development, to design and implement post-construction controls to mitigate stormwater pollution throughout the entire Project site. As such, the Project would be required to incorporate a newly engineered stormwater drainage system, various Best Management Practices, and low-impact design techniques to treat on-site stormwater. Prior to construction of the proposed Project, the City would review this stormwater drainage and treatment system to ensure it is consistent with Municipal Code requirements. Through implementation of the City of Los Angeles Low Impact Development Ordinance, on-site water runoff would be routed to the stormwater drain system, therefore operations of the Project are unlikely to affect groundwater and thus, long-term operational impacts associated with water quality standards would be less than significant.

- b) *Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?*

Groundwater Supplies

Less-Than-Significant Impact. A key resource that the City has relied upon as the major component of its local supply portfolio is local groundwater. Over the last 5 years, local groundwater has provided approximately 12% of the total water supply for Los Angeles and historically has provided nearly 23% of the City's total supply during extended dry periods. In recent years, contamination issues have impacted LADWP's ability to fully utilize its local groundwater entitlements (LADWP 2015).

The City owns water rights in the San Fernando, Sylmar, Eagle Rock, Central, and West Coast Basins (Basins). Groundwater extraction from these Basins are limited by court-defined rights recorded in the *Judgment of the California Superior Court in Case No. 650079, The City of Los Angeles vs. The City of San Fernando, et al.*, dated January 26, 1979. LADWP is therefore limited in the overall amount of groundwater that they can pump from the Basins. The City's entitlement averages total 109,809 acre-feet per year (AFY) for all Basins. Extracted water is "charged" to the City's pumping entitlement, as stipulated in the 1979 judgment. As such, groundwater extraction from the Basins would continue to be limited by LADWP's adjudicated water rights. Surrounding land uses are served by LADWP's distribution system and do not rely directly on groundwater wells (LADWP 2015).

The LADWP *Urban Water Management Plan 2015* (UWMP) provides multiple-dry-year supply and demand analysis for LADWP's domestic water service area. The UWMP indicates that MWD will continue to provide 100 percent reliability through 2040 for its member agencies during average, single dry, and multiple dry year conditions. For each of these scenarios there is a projected surplus of supply in every forecast year. As shown in Table 3-23, LADWP's supplies can meet demands during multiple dry years for the next 20 years.

In its UWMP, LADWP estimated that industrial uses within its water service area would demand be an average of 131 gallons per day per employee in 2020, 128 gallons per day per employee in 2030, and 126 gallons per day per employee in 2040. Thus, it is expected that, as an industrial use, the proposed Project could demand approximately 54,496 gallons per day (61.04 AFY)⁸ of water in 2020. This would be a nominal percentage of LADWP's water demand forecast for all industrial uses in the service area of 18,869 AFY in 2020, 18,701 AFY in 2030 and 17,829 AFY in 2040. As stated in the UWMP and summarized in Table 3-23, the Project's water demand would represent a nominal percentage of the LADWP's current and future supplies, and overall, the LADWP has the water supplies to adequately serve the Project. In addition, the UWMP states that industrial uses are projected

⁸ Assuming 131 gallons per day per employee and 416 employees, this would equate to 54,496 gallons per day (131 gallons per day per employee * 416 employees = 54,496 gallons per day). The Project would employ existing LADWP workers in addition to new workers; however, this analysis conservatively assumes all employees would be new.

to utilize 15,800 AFY of recycled water by 2030 and 2040 (Table 6-4 of the UWMP) (LADWP 2015). Therefore, the Project’s demand for groundwater and domestic water supplies would be less than significant.

Table 3-23. Multiple Dry Year MWD Supply Capability and Projected Demands (AFY)

Fiscal Year	2020	2025	2030	2035	2040
Capability of Current Supplies	2,103,000	2,154,000	2,190,000	2,242,000	2,260,000
Projected Demands	2,001,000	2,118,000	2,171,000	2,216,000	2,258,000
Projected Surplus	102,000	36,000	19,000	26,000	2,000
Projected Surplus %	5%	2%	1%	1%	0.1%
Supplies under Development	43,000	80,000	204,000	245,000	286,000
Potential Surplus	145,000	116,000	223,000	271,000	288,000
Potential Surplus %	7%	5%	10%	12%	13%

Source: LADWP 2015

Notes: Units are in acre-feet per year.

Groundwater Recharge

Less-Than-Significant Impact. Once operational, the Project site would be predominantly composed of paved, impervious surfaces, and structures. However, the Project would be required to comply with the City of Los Angeles Low Impact Development Ordinance; therefore, the Project must be designed to capture stormwater runoff, to the maximum extent feasible, in priority order: infiltration, evapotranspiration, capture and use, treated through a high removal efficiency biofiltration/biotreatment system. The Project would be designed to collect and contain water on site and would promote groundwater recharge by allowing these on-site flows to percolate into subsurface soils. Therefore, impacts associated with groundwater recharge would be less than significant.

c) *Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*

- (i) *result in substantial erosion or siltation on- or off-site;*
- (ii) *substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site;*
- (iii) *create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or*
- (iv) *impede or redirect flood flows?*

Less-Than-Significant Impact. No streams, rivers, wetlands, or other water bodies are located on, or within the vicinity of, the Project site. As such, the Project would not result in the alteration of the course of a stream

or river. However, construction of the Project would result in ground surface disruption during grading and excavation that could create the potential for erosion to occur. The construction contractor would be required to implement methods to minimize erosion and sedimentation during construction, in accordance with the Construction General Permit described in Section 3.10(a). Compliance with the Project-specific SWPPP that is required per the Construction General Permit, specifically the use of run-off control devices, would ensure that flooding on or off site is minimized during construction to the extent practicable.

During operation, the Project would result in the construction of water facility buildings and additional impervious surfaces on the site. However, the Project would comply with the City of Los Angeles Low Impact Development Ordinance, which requires management of stormwater on site, including measures to capture and infiltrate stormwater into pervious surfaces. Due to the required compliance with the ordinance, the Project would result in a less-than-significant impact relative to erosion or siltation on or off the Project site.

Considering the Project site is not located within a 100-year flood hazard area (FEMA 2008), and that the Project would be in accordance with the Construction General Permit and the City of Los Angeles Low Impact Development Ordinance, impacts related to this topic would be less than significant.

d) *Would the Project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?*

Less-Than-Significant Impact. As described in Section 3.10(c), the Project site is not located within a 100-year flood hazard area (FEMA 2008). As such, the Project would not result in the alteration of the course of a stream or river. The proposed Project site is not located within a hillside area or a tsunami inundation area (City of Los Angeles 1996). Therefore, the Project site would not be subject to inundation by tsunami or mudflow.

The Project site is located within a potential inundation area, as mapped in the *City of Los Angeles General Plan Safety Element*. This mapped inundation area covers approximately half of the San Fernando Valley and is primarily associated with the Los Angeles Reservoir, Hansen Dam, and Sepulveda Dam (City of Los Angeles 1996). These maps are based on the assumption of an immediate and total catastrophic failure of a dam(s), and do not consider the effects of dam safety regulations (such as continual monitoring/inspections) or show the actual probability of failure. These maps are prepared as worst-case scenarios for emergency planning purposes and the actual likelihood of a dam breach is low, given the Department of Water Resources Division of Safety of Dams requires annual monitoring/inspections, and corrective actions if any dam is shown to have vulnerabilities—either structural or earthquake related. Dams and reservoirs are also monitored by the City during storms. However, the Project site is approximately 3 miles or more from these inland water bodies. The potential for seiches to occur within these inland water bodies is reduced through regulation of their water levels and the provision of walls of extra height to contain seiches. Given these safety measures and the distance between the Project site and the nearest inland water body, inundation related to a seiche is considered unlikely.

Additionally, the Project would not involve development of new residences. Therefore, risks associated with dam inundation on the proposed Project are not considered to be significant. Impacts would be less than significant.

e) ***Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?***

Less-Than-Significant Impact. As previously discussed, the Project would incorporate temporary Best Management Practices during construction activities and Low Impact Development techniques during the operational phase to help ensure that stormwater, as well as any potential pollutants contained within these flows, is adequately collected and treated on the Project site to avoid conveying stormwater off site and causing subsequent downstream impacts. As such, with compliance with regulatory requirements, the proposed Project would reduce potential water quality impairment of surface waters such that existing and potential beneficial uses of key surface water drainages throughout the jurisdiction of the LARWQCB Basin Plan would not be adversely impacted. As a result, the proposed Project would not conflict with or obstruct the LARWQCB Basin Plan.

With respect to groundwater management, the Sustainable Groundwater Management Act empowers local agencies to form Groundwater Sustainability Agencies to manage basins sustainably, and requires those Groundwater Sustainability Agencies to adopt Groundwater Sustainability Plans for crucial groundwater basins in California. A Groundwater Sustainability Agency has not been established for the San Fernando Basin, as it is not considered a high priority basin. Further, as previously discussed, the Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge. As a result, the Project would not conflict with or obstruct this sustainable groundwater management plan. Impacts would be **less than significant**.

References

- City of Los Angeles. 1996. *Safety Element Exhibit G – Inundation & Tsunami Hazard Areas in the City of Los Angeles* and *Safety Element Exhibit C – Landslide Inventory & Hillside Areas*. In *City of Los Angeles General Plan: Safety Element*. Adopted November 26, 1996. Accessed January 11, 2017. <http://cityplanning.lacity.org/index.htm>.
- City of Los Angeles. 2012. City of Los Angeles Municipal Code, Chapter VI Public Works and Property, Article 4.4 Stormwater and Urban Runoff Pollution Control. <https://law.resource.org/pub/us/code/city/ca/LosAngeles/Municipal/chapter06.pdf>.
- FEMA (Federal Emergency Management Agency). 2008. “Flood Insurance Rate Map.” Map Number 06037C1305F. Panel 1305 of 2350. September 26, 2008.

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LADWP (Los Angeles Department of Water and Power). 2011. *Urban Water Management Plan 2010*.

http://www.water.ca.gov/urbanwatermanagement/2010uwmps/Los%20Angeles%20Department%20of%20Water%20and%20Power/LADWP%20UWMP_2010_LowRes.pdf.

LADWP. 2015. *Mid Valley Water Facility Conceptual Design Report*. Revision D. Task Order ESC-33. Prepared by CDM Smith. August 28, 2015.

State Water Board. 2014. Los Angeles Regional Water Quality Control Board Basin Plan.

https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/basin_plan_documentation.html

3.11 Land Use and Planning

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) *Would the Project physically divide an established community?*

No Impact. The physical division of an established community typically refers to the construction of a linear feature, such as a major highway or railroad tracks, or removal of a means of access, such as a local road or bridge, that would impair mobility within an existing community or between a community and outlying area. Under the existing conditions, the Project site is not used as a connection between established communities. Instead, connectivity in the surrounding Project area is facilitated via local roadways and pedestrian rights-of-way. Therefore, no impacts associated with physical division of an established community would occur.

b) *Would the Project cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

No Impact. The Project would be located on a site that is owned by LADWP and that is immediately east of the existing LADWP Power Yard. The Project site is located within the M2-1 zone, with a General Plan land use designation of Light Manufacturing. The site is also located within a Los Angeles State Enterprise Zone as well as within Metropolitan Transportation Authority Project and Transit Priority Areas given the site's proximity to the Van Nuys Metrolink station. Due to the Project site's proximity to the Bob Hope and Van Nuys Airports, height

restrictions are in place for the site. Depending on the specific location within the site, the height limit is 150, 200, or 500 feet above elevation of 790 feet. The average elevation of the site is 770 feet, thereby providing a maximum allowable height of between 170 and 270 feet. However, none of the proposed buildings would exceed 75 feet in height. As such, the Project would not conflict with any applicable land use plan, policy, or regulation; no impact would occur.

3.12 Mineral Resources

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) *Would the Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*

No Impact. According to the State of California Department of Conservation, Division of Oil, Gas, and Geothermal Resources, there are no gas, geothermal, or other known wells located on the Project site. The closest well is located approximately 0.4 mile southwest from the Project site and is operated by Chevron U.S.A (CDOC 2016). The Project would not result in a land use conflict with the existing oil extraction, nor would it preclude future oil extraction on underlying deposits. According to Exhibit A of the *City of Los Angeles General Plan* Conservation Element, the Project site is not located within a mineral resource zone (City of Los Angeles 2001). Therefore, the Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. No impact would occur, and no mitigation is required.

b) *Would the Project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?*

No Impact. According to Exhibit A of the *City of Los Angeles General Plan* Conservation Element, the Project site is not located within a mineral resource zone (City of Los Angeles 2001). Further, as discussed in Section 3.12(a), there are no gas, geothermal, or other known wells located on the Project site, and the Project would neither result in a land use conflict with the existing oil extraction, nor preclude future oil extraction on

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underlying deposits. Therefore, implementation of the Project would not result in the loss of availability of a locally important mineral resource recovery site; no impacts would occur, and no mitigation is required.

References

CDOC (California Department of Conservation). 2016. "Division of Oil, Gas, and Geothermal Resources Well Finder." Accessed June 2016. <http://maps.conservation.ca.gov/doggr>.

City of Los Angeles. 2001. "Conservation Element." In *City of Los Angeles General Plan*. Adopted September 26, 2001. Accessed January 2017. <http://planning.lacity.org/cwd/gnlpln/consvelt.pdf>.

3.13 Noise

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Existing Noise Conditions

The proposed Project site is located at 7600 North Tyrone Avenue in the Van Nuys area of the City. Currently, the Project site is vacant. Land uses in the immediate vicinity of the Project site are predominantly light industrial. Located immediately north of the Project site are railroad tracks utilized by Amtrak, Metrolink, and others. North of the railroad tracks are additional light industrial uses and big box retail. West of the Project site is the LADWP Power System Yard, which is accessed via Van Nuys Boulevard. Fronting Van Nuys Boulevard are predominantly retail uses. South of the Project site is a light industrial complex, and further to the south are Covello Street and a residential neighborhood of

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single-family homes, located approximately 560 feet south of the Project’s southern boundary. East of the Project site is a used car sales lot that processes donated vehicles.

Two major airports are located within relative close proximity of the Project site. The Bob Hope Burbank Airport is located approximately 4 miles to the east, and the Van Nuys Regional Airport is located approximately 2.5 miles to the west. Additionally, at the intersection of Van Nuys Boulevard with the railroad tracks, a new Metrolink train station is currently under construction.

The Project site is located within the M2-1 zone, with a General Plan land use designation of Light Manufacturing. The City of Los Angeles’ Municipal Code permissible ambient noise levels within areas zoned M2-1 are 65 A-weighted decibels (dBA) during daytime and nighttime due to light and heavy industrial uses (City of Los Angeles 2016). Currently, the Project site and surrounding area experience noise associated with the surrounding land uses; noise from trucks and passenger vehicles, forklifts, and other machinery, as well as substantial levels of traffic noise on nearby roadways including Van Nuys Boulevard and Hazeltine Avenue; and noise from the adjacent rail line on the northern boundary of the Project site, overhead aircraft, and ambient community noise.

Noise measurements were conducted at noise-sensitive land uses adjacent to the Project site in December 2016 to characterize the existing noise environment. The daytime, short-term (1 hour or less) attended sound level measurements were taken with a Rion NL-52 sound-level meter. This sound-level meter meets the current American National Standards Institute standard for a Type 1 precision sound-level meter. The calibration of the sound level meter was verified before and after the measurements, and the measurements were conducted with the microphone positioned approximately 5 feet above the ground.

Four noise measurement locations (M1–M4) were selected. Measurement locations M1 – M3 represent the nearest noise-sensitive land uses, and one (M4) represents existing on-site noise conditions. The measurement locations are shown in Figure 3-3, and the measured average noise levels and measurement locations are provided in Table 3-24. Noise measurement data is also included in Appendix E. The primary noise sources at the locations consisted of traffic along the adjacent roads, distant traffic, birds, aircraft, and neighborhood community noise. As shown in Table 3-24, the measured noise levels ranged from 54 dBA equivalent continuous sound level (L_{eq}) at M4 to 72 dBA L_{eq} at M1.

Table 3-24. Measured Noise Levels

Receptors	Location/Address	Date	Time	L_{eq} (dBA)	L_{max} (dBA)
M1	Near residence southeast corner of Tyrone Avenue and Covello Street.	December 15, 2016	11:05 a.m. – 11:15 a.m.	72.2	88.6
M2	Residence (14127 Cohasset Street) south of Covello Street, west of Hazeltine Avenue.	December 15, 2016	12:05 p.m. – 12:15 p.m.	55.3	93.6

Table 3-24. Measured Noise Levels

Receptors	Location/Address	Date	Time	L _{eq} (dBA)	L _{max} (dBA)
M3	Residence (14431 Cohasset Street) south of Covello Street, east of Van Nuys Boulevard.	December 15, 2016	11:45 a.m. – 11:55 a.m.	57.6	92.3
M4	On site, near southern project boundary.	December 15, 2016	11:20 a.m. – 11:30 a.m.	53.5	76

Source: Appendix E.

Note: L_{eq} = equivalent continuous sound level (time-averaged sound level); L_{max} = maximum sound level during the measurement interval

Regulatory Framework

City of Los Angeles Noise Ordinance

The City of Los Angeles regulates noise through several sections of its Municipal Code (City of Los Angeles 2016): Section 41.40 (Noise Due to Construction, Excavation Work – When Prohibited), which establishes time prohibitions on noise generated by construction activity; Section 112.04 (Powered Equipment Intended for Repetitive Use in Residential Areas and Other Machinery, Equipment and Devices), which prohibits the use of loud machinery and/or equipment within 500 feet of residences and prohibits noise from machinery, equipment, or other devices that would result in an increase of more than 5 decibels (dB) above the ambient noise level at residences; and Section 112.05 (Maximum Noise Level of Powered Equipment or Powered Hand Tools), which establishes maximum noise levels for powered equipment and powered hand tools (i.e., 75 dBA at a distance of 50 feet for construction, industrial, and agricultural equipment between the hours of 7:00 a.m. and 10:00 p.m.). According to Section 41.40, no construction activity that might create loud noises in or near residential areas or buildings shall be conducted between the hours of 9:00 p.m. and 7:00 a.m. on weekdays, before 8:00 a.m. or after 6:00 p.m. on Saturday and national holidays, or at any time on Sunday.

- a) ***Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?***

Construction

Less-Than-Significant Impact. Construction noise and vibration are temporary phenomena. Construction noise and vibration levels vary from hour to hour and day to day, depending on the equipment in use, the operations being performed, and the distance between the source and receptor. Construction of the proposed Project would begin in November 2020 and would be completed by the end of January 2023. Construction of the proposed Project would include site preparation, grading, trenching, building construction, paving, and application of architectural coatings.

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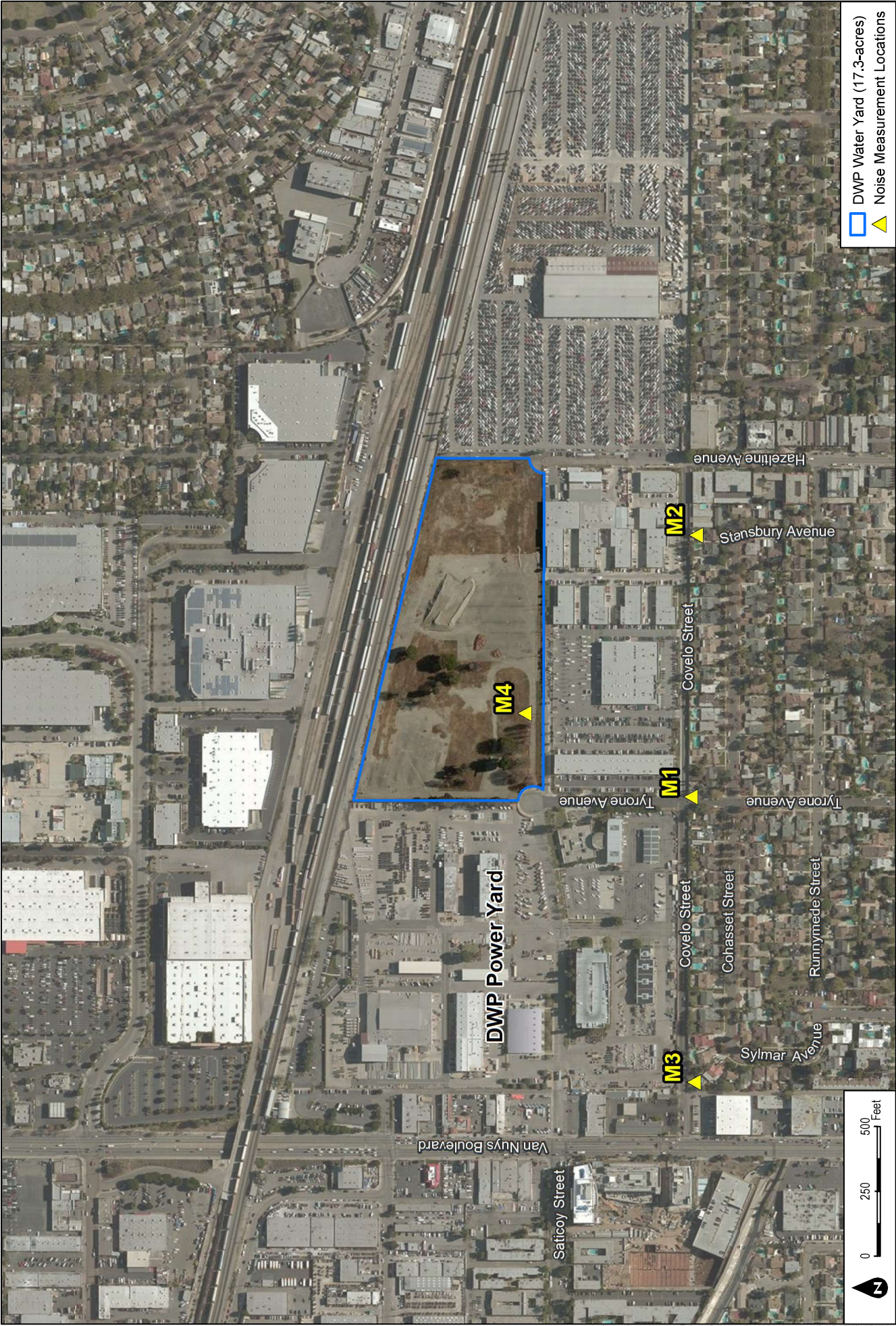
Equipment that would be in operation during construction would include rubber-tired dozers, graders, tractors/loaders/backhoes, cranes, forklifts, welders, generator sets, pavers, paving equipment, cement mixers, and air compressors. The types of construction equipment that would be used to construct the proposed Project include standard equipment that would be employed for any routine construction project of this scale; construction equipment with substantially higher noise-generation characteristics (such as pile drivers, rock drills, blasting equipment) would not be necessary for construction of the Project.

Construction noise is difficult to quantify because of the many variables involved, including the specific equipment types, size of equipment used, percentage of time each piece is in operation, condition of each piece of equipment, and number of pieces that would operate on the Project site. The typical maximum noise levels for various pieces of construction equipment at a distance of 50 feet are presented in Table 3-25, Construction Equipment Maximum Noise Levels. Note that the equipment noise levels presented in Table 3-25 are maximum noise levels. Typically, construction equipment operates in alternating cycles of full power and low power, producing average noise levels less than the maximum noise level. The average sound level of construction activity also depends on the amount of time that the equipment operates and the intensity of construction activities during that time.

Table 3-25. Construction Equipment Maximum Noise Levels

Equipment	Sound Level (dBA) 50 Feet from Source
Air compressor	81
Backhoe	80
Compactor	82
Concrete mixer	85
Concrete pump	82
Concrete vibrator	76
Crane, mobile	83
Dozer	85
Generator	81
Grader	85
Impact wrench	85
Jackhammer	88
Loader	85
Paver	89
Pneumatic tool	85
Pump	76
Roller	74
Saw	76
Truck	88

Source: FTA 2018.



DWP Water Yard (17.3-acres)
▲ Noise Measurement Locations

FIGURE 3-3
Noise Measurement Locations

SOURCE: Bing Maps, 2016

Mid Valley Water Facility Project



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The maximum noise levels at 50 feet for typical construction equipment would range up to 89 dB for the type of equipment normally used for this type of development project, although the hourly noise levels would vary. Construction noise in a well-defined area typically attenuates at approximately 6 dB per doubling of distance. Project construction would take place both near and far from adjacent, existing noise-sensitive uses. For example, construction of the proposed Project along the southern Project boundaries would take place within approximately 560 feet of existing residences. However, during construction of other Project components, construction would be approximately 1,300 feet or more away from existing noise-sensitive uses.

The Federal Highway Administration’s (FHWA) Roadway Construction Noise Model (RCNM) (FHWA 2008) was used to estimate construction noise levels at the nearest occupied noise-sensitive land use. Although the model was funded and promulgated by the FHWA, the RCNM is often used for non-roadway projects because the same types of construction equipment used for roadway projects are also used for other project types. Input variables for the RCNM consist of the receiver/land use types, the equipment type and number of each (e.g., two graders, a loader, a tractor), the duty cycle for each piece of equipment (e.g., percentage of hours the equipment typically works per day), and the distance from the noise-sensitive receiver. Because the nearest noise-sensitive land uses (residences to the south) have solid masonry property-line walls along their northern boundaries, and because light-industrial buildings exist between the Project site and the residential uses, a conservative 5 dB to account for structural shielding was assumed in the modeling. The RCNM has default duty-cycle values for the various pieces of equipment, which were derived from an extensive study of typical construction activity patterns. Those default duty-cycle values were used for this noise analysis.

Using the FHWA’s RCNM construction noise model and construction information (types and number of construction equipment by phase), the estimated noise levels from construction were calculated for a representative range of distances, as presented in Table 3-26, Construction Noise Model Results Summary. The RCNM inputs and outputs are provided in Appendix E.

Table 3-26. Construction Noise Modeling Summary Results

Construction Phase	L _{eq} (dBA)	
	Nearest Receiver 560'	Typical Receiver 850'
Site Preparation	59	56
Grading	60	56
Trenching & Underground Utilities	57	54
Perimeter Wall Construction	60	56
Paving & Site Infrastructure	60	57
Office Building and Staff Parking Structure Construction	58	55
Water Distribution Shop and Maintenance Building Construction	55	52
Department Fleet Vehicles Parking Structure Construction	55	52

Table 3-26. Construction Noise Modeling Summary Results

Construction Phase	L _{eq} (dBA)	
	Nearest Receiver 560'	Typical Receiver 850'
Supply Chain Services Warehouse Construction	47	43
Fleet Maintenance	47	43
Building and CNG Dispensing Area Construction	60	57
Architectural Coating	48	44
Street Improvement of Hazeltine Ave.	60	56

Source: Appendix E

Note: L_{eq} = equivalent continuous sound level

As shown in Table 3-26, the highest noise levels are predicted to occur during grading, perimeter wall construction, paving, building and CNG area, and street improvements, when noise levels from construction activities would be as high as 60 dBA L_{eq} at the nearest existing residences, approximately 560 feet away. Typically, construction noise levels are anticipated to range from approximately 43 to 57 dBA L_{eq}.

The City's Municipal Code prohibits loud construction noise in or near residential areas or buildings between the hours of 9:00 p.m. and 7:00 a.m. on weekdays, before 8:00 a.m. or after 6:00 p.m. on Saturday and national holidays, or at any time on Sundays. Construction activities for this Project would occur over 500 feet away from residences, and the resultant noise levels at the nearest residences would be relatively low. Therefore, temporary ambient noise impacts from construction would be less than significant.

On-Site Operational Noise

Less-Than-Significant Impact. Once constructed, the Project would provide laydown and equipment yard areas, parking for employee and department vehicles, a CNG fueling station, warehouse, loading dock and staging areas, construction areas and fabrication shops, conference rooms and ancillary facilities such as a break/lunch room, a fitness room, showers, locker rooms, and building services offices. Noise would be generated by these facilities and planned activities, particularly those activities taking place outdoors such as laydown and exterior construction areas, loading docks etc. However, the site is configured such that these noisier activities would generally take place away from the southern side of the site, where the nearest noise-sensitive land uses exist (residences, located a minimum of 560 feet away). Additionally, the Project includes a continuous row of buildings that would be constructed along the south side of the Project site such that the on-site activities would be both acoustically and visually shielded from the south by the buildings. Existing structures between the Project site and the residences to the south also would provide substantial noise reduction, as would existing structures in between the next-nearest residences, located approximately 750 feet or more to the northeast.

Based upon the distance between the Project site and the nearest noise-sensitive uses, the Project’s design, which would provide acoustical shielding, and existing intervening structures, no exceedance of City noise standards or substantial increase compared to existing noise levels would occur. As such, permanent ambient noise impacts associated with Project operations would be less than significant. No mitigation is required.

Off-Site Operational (Traffic) Noise

Less-Than-Significant Impact. The proposed Project would add passenger vehicle and truck trips along local roadways. According the City of Los Angeles CEQA Thresholds Guide (City of Los Angeles 2006) “A project would normally have a significant impact on noise levels from project operation if the project causes the ambient noise level measured at the property line of an affected use to increase by 3 decibels (dBA) or more in community noise equivalency level (CNEL) to or within the “normally unacceptable” or “clearly unacceptable” category of the noise exposure chart prepared by the California Department of Health Services, or any 5 dBA or greater noise increase.”

The results of the traffic modeling for the existing and existing plus Project scenarios are summarized in Table 3-27, and the traffic noise model input/output files are located in Appendix E. As shown, the Project-related traffic would result in a noise level increase of 2 dB CNEL or less (rounded to whole numbers) along the studied roads in the vicinity of the Project site. None of the modeled receivers would exceed the 65 dBA CNEL City noise standard (City of Los Angeles 1999) for residences as a result of the increase in Project-related traffic. Additionally, noise increases would be well below the significance threshold of 5 dB. Therefore, traffic related to the proposed Project would not exceed any noise standards and would not substantially increase the existing noise levels in the Project vicinity, and permanent traffic-related ambient noise impacts would be less than significant. No mitigation is required.

Table 3-27. Traffic Noise (Existing and Existing Plus Project)

Modeled Receptor	Existing Noise Level (dBA CNEL)	Existing Plus Project Noise Level (dBA CNEL)	Noise Level Increase (dB)
M1	56	56	0
M2	58	59	1
M3	60	60	0
Hazeltine Avenue north of Valerio Street	61	61	0
Tyrone Avenue north of Valerio Street	54	55	1
Valerio Street west of Tyrone Avenue	63	63	0
Valerio Street east of Tyrone Avenue	63	63	0
Valerio Street east of Hazeltine Avenue	64	64	0

Source: Appendix E.

The noise level increases associated with additional traffic volumes under future (Year 2023) without Project traffic conditions and future with Project traffic conditions are summarized in Table 3-28. None of the modeled receivers would exceed the 65 dBA CNEL City noise standard as a result of the increase in Project-related traffic. The noise level increases associated with the Project under future traffic conditions would be 2 dB or less (rounded to whole numbers). Therefore, traffic related to the proposed Project would not exceed any noise standards and would not substantially increase the existing noise levels in the Project vicinity. Operational traffic-related noise impacts would be less than significant. No mitigation is required.

Table 3-28. Traffic Noise (Future and Future Plus Project)

Modeled Receptor	Future without Project Noise Level (dBA CNEL)	Future Plus Project Noise Level (dBA CNEL)	Noise Level Increase (dB)
M1	56	56	0
M2	58	59	1
M3	60	60	0
Hazeltine Avenue north of Valerio Street	61	61	0
Tyrone Avenue north of Valerio Street	54	55	1
Valerio Street west of Tyrone Avenue	63	63	0
Valerio Street east of Tyrone Avenue	63	63	0
Valerio Street east of Hazeltine Avenue	64	64	0

Source: Appendix E.

b) *Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?*

Construction

Less-Than-Significant Impact. Construction activities that might expose persons to excessive groundborne vibration or groundborne noise could cause a potentially significant impact. Groundborne vibration information related to construction activities has been collected by Caltrans (Caltrans 2013). Information from Caltrans indicates that transient vibrations (such as construction activity) with a peak particle velocity of approximately 0.035 inch per second may be characterized as barely perceptible, and vibration levels of 0.24 inch per second may be characterized as distinctly perceptible. The heavier pieces of construction equipment, such as bulldozers, would have peak particle velocities of approximately 0.089 inch per second or less at a distance of 25 feet (FTA 2018).

Groundborne vibration is typically attenuated over short distances. At the nearest existing noise/vibration-sensitive land uses (residential) distance to the nearest construction area (approximately 560 feet) and with the anticipated construction equipment, the peak particle velocity would be approximately 0.001 inch per second. This vibration level is well below the threshold of “barely perceptible” of 0.035 inch per second vibration.

The major concern with regards to construction vibration is related to building damage. Construction vibration as a result of the proposed Project would not result in structural building damage, which typically occurs at

vibration levels of 0.5 inch per second or greater for buildings of reinforced-concrete, steel or timber construction. Therefore, excessive groundborne vibration and groundborne noise would not be generated. Impacts related to groundborne vibration would be less than significant.

Operation

Less-Than-Significant Impact. As described in 3.12(a), once operational the new facilities would replace and consolidate a combination of outdated buildings and trailers at numerous locations throughout the San Fernando Valley. On-site activities would include receiving and storing bulk deliveries, facilities maintenance, testing and calibration of meters, sand blasting, coating application, welding, and fleet maintenance. Although these activities would generate groundborne vibration, the vibration levels are anticipated to be similar to those generated by construction projects and in the same manner would attenuate over relatively short distances. At the nearest noise/vibration-sensitive land uses, located a minimum of 560 feet away, groundborne vibration levels would be well below the thresholds of perception or potential structural damage. Impacts associated with Project operations would be less than significant.

- c) ***For a Project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?***

Less-Than-Significant Impact. The Van Nuys Regional Airport is located approximately 2.5 miles to the west; Whiteman Airport is located approximately 3.7 miles to the north; and Bob Hope Burbank Airport is located approximately 4 miles to the east of the Project site. However, the Project site is not located within the Airport Influence Areas of any of these or any other airports (Los Angeles County Airport Land Use Commission 1991). Therefore, the Project would not expose people working or residing in the Project area to excessive noise levels from airports or aircraft. Impacts associated with Project implementation would be less than significant.

References

- Caltrans (California Department of Transportation). 2013. *Transportation and Construction Vibration Guidance Manual*. September 2013. http://www.dot.ca.gov/hq/env/noise/pub/TCVGM_Sep13_FINAL.pdf.
- City of Los Angeles. 1999. "Noise Element." In *City of Los Angeles General Plan*.
- City of Los Angeles. 2006. *L.A. CEQA Thresholds Guide: Your Resource for Preparing CEQA Analyses in Los Angeles*. <http://www.environmentla.org/programs/Thresholds/Complete%20Threshold%20Guide%202006.pdf>.
- City of Los Angeles. 2016. City of Los Angeles Municipal Code. Effective November 12, 1936, current through October 24, 2016.

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FHWA (Federal Highway Administration). 2008. Roadway Construction Noise Model (RCNM). Version 1.1. December 8, 2008.

FTA (Federal Transit Administration). 2018. Transit Noise and Vibration Impact Assessment Manual. FTA, Office of Planning and Environment. Report No. 0123.

Los Angeles County Airport Land Use Commission. 1991. *Airport Land Use Commission, Comprehensive Land Use Plan*. Adopted December 19, 1991, Revised December 1, 2004.

3.14 Population and Housing

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) *Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

Less-Than-Significant Impact. The Project would involve construction of a consolidated campus with modern facilities and consolidated operations for the Water System. Specifically, new facilities would be constructed for Trunk Line Construction, Main Line Construction, Meter Shop, Supply Chain Services, Fleet Services, Emergency Operations Center, and Trouble Board groups. The Project would not include the construction or development of housing facilities. Although the Project would involve the consolidation of existing LADWP water facilities, and would use employees from the existing water facilities, the Project would involve an increase in employees to accommodate the new Water Facility.

In 2023, upon buildout of the Project, it is anticipated that 316 employees would be employed at the Water Facility.

SCAG is a metropolitan planning organization that represents the Counties of Ventura, Los Angeles, San Bernardino, Orange, Riverside, and Imperial. As part of the 2016–2040 RTP/SCS, SCAG has prepared

population, household, and employee projections for the region. Table 3-29 shows the employee projections from 2012 to 2040 for the City of Los Angeles. Although employees are expected to come from multiple cities throughout the San Fernando Valley, the existing and future employee distribution data is not available. Therefore, it was conservatively assumed that all future employees would come from the City of Los Angeles.

Table 3-29. Employment Growth for the City of Los Angeles

	2012	2040
Employment	1,696,400	2,169,100

Source: SCAG 2016.

The Project would employ 316 workers, and it is conservatively assumed that the Project would introduce 316 new employees to Van Nuys, in the City of Los Angeles, although the Project would employ existing LADWP workers from the sites being consolidated as part of the Project. This increase is only 0.10% of SCAG’s overall growth of 472,700 employees for the City from 2012 to 2040. Therefore, employee growth is consistent with SCAG’s overall growth projections and would not result in a substantial increase in population growth. Impacts as a result of increase in employees would be less than significant.

b) *Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

No Impact. The proposed Project would neither displace existing people or housing nor necessitate the construction of replacement housing. Therefore, no impact would occur.

References

SCAG (Southern California Association of Governments). 2016. “Current Context – Demographics & Growth Forecast 2016 RTP/SCS Appendix.” In *2016–2040 Regional Transportation Plan/Sustainable Communities Strategy*. Adopted April 2016. http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_DemographicsGrowthForecast.pdf.

3.15 Public Services

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) *Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:*

Fire protection?

Less-Than-Significant Impact. Fire protection for the Project site is provided by the Los Angeles Fire Department (LAFD), and the monitoring of operations is provided by LADWP. Once operational, the Project would continue to be served by the LAFD. While the Project could potentially result in a slight increase in calls for service to the Project site in comparison to the existing conditions, this increase is expected to be nominal and would not result in the need for new LAFD facilities. Overall, it is anticipated that the Project would be adequately served by existing LAFD facilities, equipment, and personnel. Therefore, impacts associated with the construction of LAFD facilities would be less than significant.

Police protection?

Less-Than-Significant Impact. Police protection for the Project site is provided by the Los Angeles Police Department (LAPD) and LADWP security personnel. The Project would be enclosed with fencing upon Project implementation. Both site entrances have locked gates.

Similar to fire protection services, the Project site is already within the service area of the LAPD, and once operational, the Project would continue to be served by the LAPD. While the Project would potentially result in

a slight increase in calls for service to the Project site in comparison to the existing conditions, this increase is expected to be nominal and not result in the need for new LAPD facilities. Overall, it is anticipated that the Project would be adequately served by existing LAPD facilities, equipment, and personnel. Therefore, impacts associated with the construction or expansion of LAPD facilities would be less than significant.

Schools?

Less-Than-Significant Impact. As previously discussed in Section 3.15(a), the proposed Project would not substantially induce population growth in the City. As such, it is not anticipated that a significant number of people would relocate to the City as a result of the Project, and an increase in school-age children requiring public education is not expected to occur as a result of the Project. Therefore, impacts associated with the construction or expansion of school facilities would be less than significant.

Parks?

Less-Than-Significant Impact. As further discussed in Section 3.16, Recreation, the proposed Project would not substantially induce population growth in the City. As such, an increase in patronage at park facilities is not expected. Impacts associated with the construction or expansion of park facilities would be less than significant.

Other public facilities?

Less-Than-Significant Impact. The proposed Project would not substantially induce population growth in the City. Thus, a substantial increase in patronage at libraries, community centers, or other public facilities is not expected. Therefore, impacts associated with the construction or expansion of public facilities would be less than significant.

3.16 Recreation

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) *Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*

No Impact. Demand for neighborhood or regional parks or other recreational facilities is primarily generated by an increase in the permanent residential population. The Project does not propose any residential uses that may increase the utilization of existing neighborhood parks in the vicinity such that substantial physical deterioration of the facility or an increase in park facilities would occur or be accelerated. Therefore, no impacts associated with parks or other recreational facilities would occur, and no mitigation is required.

- b) *Does the Project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?*

No Impact. As discussed in Section 3.16(a), the Project site does not operate as a recreational facility and the Project does not include recreational facilities, or require the construction or expansion of recreational facilities. Therefore, no impacts to recreational facilities would result that might have an adverse physical effect on the environment and no mitigation is required.

3.17 Transportation

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

This analysis is based on the Transportation Impact Study prepared for this Project, included as Appendix F to this MND. The City of Los Angeles Department of Transportation’s reviewed and approved the Transportation Impact

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Study. A copy of LADOT's Assessment Letter of the Transportation Impact Study is also included in Appendix F. Nine intersections were defined for analysis in the Transportation Impact Study. They include:

1. Van Nuys Boulevard/Saticoy Street
2. Van Nuys Boulevard/Valerio Street
3. Tyrone Avenue/Valerio Street
4. Hazeltine Avenue/Valerio Street
5. Woodman Avenue/Valerio Street
6. Van Nuys Boulevard/Sherman Way
7. Tyrone Avenue/Sherman Way
8. Hazeltine Avenue/Sherman Way
9. Woodman Avenue/Sherman Way

All study intersections are signalized.

Study Scenarios

Weekday morning and afternoon peak hour traffic operations were evaluated at the nine study intersections for each of the following traffic scenarios:

- Existing (Year 2018)
- Existing Plus Project
- Future (Year 2023) without Project
- Future (Year 2023) with Proposed Project

Existing Conditions

To define existing traffic conditions, new peak period turning movement counts were collected on Wednesday, December 12, 2018, at the study intersections. The analysis of existing traffic volumes used for this traffic analysis and the peak-hour turning movement traffic volume counts are provided in Appendix F.

Google Earth aerial footage and street view was reviewed to identify the lane characteristics of major roadways, to identify traffic control and lane configuration at each study intersection, and to identify the location of on-street parking and transit stops.

The existing conditions at each of the study intersections and street segments is further discussed in Appendix F.

Project Trip Generation and Distribution

Project trip generation calculations included rates established by Trip Generation (10th edition), published by the Institute of Transportation Engineers (ITE). Due to the Project's proximity to the Amtrak/MetroLink Station and bus lines operating along Van Nuys Boulevard, a transit trip generation credit was applied. Additionally, an adjustment was also made due to a high percentage of commuters arriving and leaving work outside of AM and PM peak hours.

Existing Plus Project Conditions

Based on the traffic from the proposed Project, the existing plus Project conditions were analyzed. The LOS for existing plus Project conditions for the study area is discussed in Appendix F.

Future Without Project Conditions

In order to define regional traffic growth that would affect operations at the study intersections during the Project buildout year (2023), an ambient/background traffic growth rate was defined to account for increase in area-wide traffic. An annual growth rate of 0.54%, as provided in the "General Traffic Volumes Growth Factors" (from the respective Regional Statistical Area #12 – RSA) found in Exhibit D-1 of the Los Angeles County Congestion Management Program (CMP) (Metro 2010), was utilized to increase existing (year 2018) traffic volumes to establish future (year 2023) base traffic volumes.

In addition to future ambient growth, traffic from projects in the area (approved and pending) was also included in the analysis. Information was collected by the City of Los Angeles pertaining to approved projects and projects pending approval in the vicinity of the Project site. Daily and peak-hour trips generated from each of the related projects were computed. The trip rates are generally based on the ITE (2017) Trip Generation Manual, 10th edition.

Future With Project Conditions

Based on the inclusion of future ambient growth, traffic from related projects in the area (approved and pending), and traffic from the proposed Project, future with Project conditions were analyzed.

Determination of Traffic Impacts on Intersections

Traffic impacts are identified if a proposed development will result in a significant change in traffic conditions at a study intersection. A significant impact is typically identified if project-related traffic will cause LOS to deteriorate beyond a threshold limit specified by the overseeing agency. Impacts can also be significant if an intersection is already operating below an acceptable LOS and project-related traffic will worsen conditions within the specified threshold range. The City of Los Angeles Department of Transportation has established specific thresholds for project-related increases in the V/C of signalized study intersections. Table 3-30 shows the increases in peak-hour V/C ratios which are considered significant impacts.

Table 3-30. Impact Criteria

LOS	Final V/C	Project Related V/C Increase
C	<0.701 – 0.800	Equal to or greater than 0.040
D	<0.801 – 0.900	Equal to or greater than 0.020
E and F	0.901 or more	Equal to or greater than 0.010

Notes: LOS = Level of Service; V/C = volume to capacity

a) ***Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?***

Less-Than-Significant Impact. Measures of effectiveness for the performance of the circulation system in the City are established by the City of Los Angeles Department of Transportation (LADOT) in the *City of Los Angeles Traffic Study Policies and Procedures*. Measures of effectiveness for the vehicular circulation system are based on the V/C ratio and LOS of intersections and roadways within the City. Potential impacts to intersections and roadway segments are analyzed based on projected future traffic conditions plus Project-generated traffic. Impacts to intersections and street segments are measured in terms of increases in V/C ratio, the significance of which is based on the future projected LOS. LADOT typically requires a traffic study for projects that are likely to add 500 or more daily trips or likely to add 43 or more AM or PM peak-hour trips. LADOT requires that a technical memorandum be prepared for projects that are likely to add 25 to 42 AM or PM peak-hour trips, and the adjacent intersection(s) are presently estimated to be operating at LOS E or F (LADOT 2014).

Construction

The following assumptions were applied to the Project peak construction-period trip generation analysis:

- Construction workers would total approximately 98 persons.
- Total passenger vehicles traveling to and from the site on a daily basis would be 196 (round trip) assuming no workers would carpool.
- 68 truck trips per day (or 170 Passenger Car Equivalent (PCE) truck trips per day) are anticipated during the peak construction period.

Truck trips were multiplied by a PCE factor of 2.5, consistent with truck studies in the region.

Table 3-31 reflects the number of trips that would occur during the most trip-intensive month of construction, which occurs during fall of 2021 and includes the overlap of the following phases:

- Site Preparation (Phase 1)
- Office Building and Staff Parking Structure Construction (Phase 6)

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- Water distribution Shop and Maintenance Building Construction (Phase 7)
- Department Fleet Vehicle Parking Structure Construction (Phase 8)
- Supply Chain Services Warehouse Construction (Phase 9)
- Fleet Maintenance Building and CNG Dispensing Area Construction (Phase 10) phases.

All construction phases, along with approximate numbers of daily trips and phase start and end dates, are detailed in Table 2-2, Anticipated Construction Schedule (Section 2.3).

Table 3-31. Peak Period Construction Trip Generation Estimates

Trip Generation (Peak Construction) ¹							
Vehicle Type	Average Daily Trips	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Construction Workers ²	196	98	0	98	0	98	98
Truck Vendors (2.5 PCE) ³	170	11	11	22	11	11	22
Total	366	109	11	120	11	109	120

Notes: PCE = passenger car equivalent

¹ The peak construction period includes Phases 1,6,7,8,9,10.

² Approximately 98 workers per day (196 trips per day), assumed all would arrive and depart during the AM/PM peak hours and no carpooling would occur.

³ Approximately 68 daily vehicle trips; a PCE factor of 2.5 was applied. An 8-hour workday is assumed.

As shown in Table 3-31, the temporary construction traffic that would be generated by the proposed Project would be above the thresholds for further analysis that are established by LADOT. However, construction traffic would be less than that generated during operation of the Project, as detailed below. Therefore, as the following operational analysis shows that the proposed Project would generate no significant impacts to the transportation network, Project construction traffic would also not create a significant traffic impact at any of the study intersections.

Operation

Traffic volumes that are expected to be generated by the Project during the weekday AM and PM peak hours and daily periods were estimated based on the Utility trip rate (ITE Code 170) defined in the ITE Trip Generation (10th edition). The trip rates and the traffic generation forecast for the proposed Project are provided in Table 3-32.

Table 3-32. Project Trip Generation Estimates

ITE Trip Generation Rates								
Land Use	Size/Unit	Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Utility (ITE 170)	per employee	4.11	0.57	0.13	0.70	0.11	0.65	0.76
Trip Generation								
Mid Valley Water Facility	416 employees	1,710	236	55	291	47	269	316
<i>Transit Reduction (15% Daily/AM,PM)¹</i>		-256	-35	-8	-44	-7	-40	-47
<i>Off-Peak Employee Trip Reduction (15% AM/PM)²</i>		0	-30	-7	-37	-6	-34	-40
NET Trip Generation		1,453	170	40	210	34	194	229

Notes:

Trip rates from ITE 2017.

- ¹ 15% Transit Reduction assumed given the proposed Project's proximity to transit service including Van Nuys Amtrak/MetroLink station, Metro and LADOT Dash bus lines.
- ² 15% Off-Peak employee trip reduction as approximately 15% of all employees are anticipated to begin work before 7:00 am and leave work before 3:00 pm, and therefore commute outside of the AM and PM peak periods.

The Project site is located near the Van Nuys Amtrak/MetroLink station, which would provide convenient access to LADWP's Power Yard and connect to the Mid Valley Water Facility. Furthermore, seven different Metro and LADOT DASH bus lines operate in the area, providing convenient access to the facility as well.

Given the Project's proximity to high-capacity, frequent transit service (Van Nuys Amtrak/MetroLink station), a 25% transit reduction was taken from the vehicle commute trips that are estimated to be generated by the Project (as shown in Table 3-32), consistent with LADOT guidelines.

The Project is estimated to gross 1,710 weekday daily trips, including 291 (236 inbound and 55 outbound) weekday AM peak-hour trips and 316 (47 inbound and 269 outbound) weekday PM peak-hour trips.

Furthermore, approximately 15% of the employees at the site would arrive before 7:00 a.m. and depart before 3:00 p.m., which would be outside of the AM and PM peak-hour analysis periods. Due to the expected number of off-peak commuters, a 15% reduction was taken from the projected vehicle trips generated by the site.

Based on the adjusted total, the Project is estimated to generate a net total of 1,453 weekday daily trips including 210 (170 inbound and 40 outbound) weekday AM peak-hour trips and 229 weekday (34 inbound and 194 outbound) PM peak-hour trips.

Based on data provided by the City of Los Angeles, a list of nearby projects was compiled as part of the cumulative analysis. These projects were considered to potentially contribute measurable traffic volumes to the study area during the future analysis period. The total number of related projects included within this traffic

analysis was 13 projects, and are all located within an approximate 3-mile radius from the Project site. A list of cumulative projects and their location is provided in Appendix F.

Table 3-33 summarizes the LOS values for the Existing conditions (2018), Existing plus Project conditions (2018), Future 2023 conditions, and Future 2023 plus Project conditions at the study intersections.

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Table 3-33. Peak Hour Impact Summary

Intersection	LOS Method	Existing 2018 Traffic Conditions						Existing 2018 plus Project Traffic Conditions						Significant Impact? (Existing plus Project Comparison)		Future 2023 Traffic Conditions						Significant Impact? (Future plus Project Comparison)	
		AM Peak			PM Peak			AM Peak			PM Peak			AM	PM	AM Peak			PM Peak			AM	PM
		V/C	LOS	C	V/C	LOS	C	V/C	LOS	C	V/C	LOS	C			V/C	LOS	C	V/C	LOS	C		
1 Van Nuys Blvd./Saitcoy St.	CMA	0.711	C	0.764	C	0.726	C	0.777	C	0.734	C	0.787	C	No	No	0.749	C	0.800	C	No	No		
2 Van Nuys Blvd./ Valerio St.	CMA	0.562	A	0.614	B	0.563	A	0.614	B	0.583	A	0.635	B	No	No	0.583	A	0.636	B	No	No		
3 Tyrone Ave./ Valerio St.	CMA	0.258	A	0.273	A	0.272	A	0.279	A	0.268	A	0.283	A	No	No	0.282	A	0.290	A	No	No		
4 Hazeltine Ave./ Valerio St.	CMA	0.593	A	0.548	A	0.650	B	0.585	A	0.611	B	0.566	A	No	No	0.668	B	0.601	B	No	No		
5 Woodman Ave./ Valerio St.	CMA	0.809	D	0.631	B	0.824	D	0.661	B	0.833	D	0.653	B	No	No	0.849	D	0.683	B	No	No		
6 Van Nuys Blvd./ Sherman Way	CMA	0.660	B	0.763	C	0.666	B	0.770	C	0.699	B	0.797	C	No	No	0.705	C	0.803	D	No	No		
7 Tyrone Ave./ Sherman Way	CMA	0.464	A	0.439	A	0.468	A	0.440	A	0.481	A	0.458	A	No	No	0.485	A	0.458	A	No	No		
8 Hazeltine Ave./ Sherman Way	CMA	0.764	C	0.707	C	0.765	C	0.732	C	0.789	C	0.732	C	No	No	0.791	C	0.757	C	No	No		
9 Woodman Ave./ Sherman Way	CMA	0.892	D	0.849	D	0.900	D	0.853	D	0.920	E	0.877	D	No	No	0.929	E	0.881	D	No	No		

Source: Appendix F.

Notes: CMA = LADOT CMA Methodology; V/C = Volume-to-Capacity ratio; LOS = Level of Service; **BOLD** value indicates unsatisfactory LOS

As indicated in Table 3-33, based on the traffic forecasts, the level of service analysis, and significant impact thresholds set forth by LADOT, the Project would not create a significant traffic impact at any of the study intersections. Therefore, impacts would be less than significant, and no mitigation measures are required.

b) *Would the Project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?*

Less-Than-Significant Impact. CEQA Guidelines Section 15064.3, subdivision (b), focuses on newly adopted criteria (vehicle miles traveled) adopted pursuant to SB 743 for determining the significance of transportation impacts. Pursuant to SB 743, the focus of transportation analysis changes from vehicle delay to VMT. The related updates to the CEQA Guidelines required under SB 743 were approved on December 28, 2018. As stated in CEQA Guidelines Section 15064.3(c), the provisions of Section 15064.3 shall apply prospectively. A lead agency may elect to be governed by the provision of Section 15064.3 immediately. The provisions must be implemented statewide by January 1, 2020.

The Office of Public Resources' regulatory text indicates that a public agency may immediately commence implementation of the new transportation impact guidelines, and that the guidelines must be implemented statewide by January 1, 2020. The traffic analysis in this section relies on LOS to characterize impacts since the MOU for traffic analysis for the proposed Project was approved by LADOT in November 2018, which was prior to approval of the revised CEQA Guidelines. Therefore, project traffic impacts are determined on a capacity-based level of service analysis for the proposed Project. Therefore, the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b).

Further, the proposed Project's location, access to other nearby destinations, pedestrian and bicycle connections, and access to bus and rail transit amenities would encourage non-auto modes of transportation such as walking, bicycling, carpooling, vanpool, transit, etc. The Project would generate 1,710 daily trips, 291 AM peak hour trips (236 inbound and 55 outbound), and 316 trips during the PM peak hour (47 inbound and 269 outbound). However, after applying a transit reduction due to the Project's proximity to transit service and an off-peak employee reduction to account for workers commuting outside the standard AM and PM peak hours, the Project would generate approximately 1,453 net daily trips, 210 AM peak hour net trips (170 inbound and 40 outbound), and 229 net trips during the PM peak hour (34 inbound and 194 outbound).

The proposed Project site would be accessible to pedestrians and cyclists via sidewalks and bike routes on the surrounding street system and is well served by transit. The majority of Van Nuys Boulevard and stretches of Sherman Way and Satcoy Street are identified as Pedestrian-Enhanced Districts within the study area by the City of Los Angeles Mobility Plan 2035. Van Nuys Boulevard and Sherman Way are identified as Tier 1 Protected Bicycle Lanes as part of the Bicycle Enhanced Network. The Project is located approximately 0.75 miles from the Van Nuys Amtrak/Metrolink station. All of these features of the proposed Project would reduce VMT.

- c) ***Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?***

No Impact. The Project would not include the construction of any new off-site roads or the modification of any existing off-site roads, either for the purposes of long-term Project operations or to temporarily support Project construction. Construction and operation of the Project would include truck deliveries of materials, components, and supplies to the site. General truck traffic is allowed on Tyrone Avenue and Hazeltine Avenue and does not represent an incompatible use. These urban roads have good sight visibility and standard lane widths. Accordingly, no impact involving incompatible uses on roadways or hazardous roadway design features would occur.

- d) ***Would the Project result in inadequate emergency access?***

No Impact. The Project would not hinder emergency access in the area. No permanent or temporary road closures or modifications are proposed as part of the Project. All construction activities and staging would take place within the existing LADWP property. No incompatible uses on public roads would occur from either construction or operation of the Project. No impact would occur.

References

ITE (Institute of Transportation Engineers). 2017. *Trip Generation Manual*, 10th ed. Washington, DC: ITE.

LADOT (City of Los Angeles Department of Transportation). 2014. *Traffic Study Policies and Procedures*. August 2014.
http://cityplanning.lacity.org/EIR/8150%20Sunset/References/4.J.%20Transportation%20and%20Circulation/TRAF.03_LADOT%20Policies%20and%20Procedures_2013.pdf.

3.18 Tribal Cultural Resources

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code 21074 as either a site, feature, place, cultural landscape, that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				

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Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
i.) Listed or eligible for listing on the California Register of Historical Resources, or included in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or,	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii.) A resource determined by a lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) ***Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code 21074 as either a site, feature, place, cultural landscape, that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:***

i.) ***Listed or eligible for listing on the California Register of Historical Resources, or included in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or,***

No Impact. Based on the cultural resources records search, site survey, and contacts made to date, no archaeological resources have been identified within the Project site (Appendix C). Information received to date from Native American tribes indicates that the site does not include known elements of cultural tribal resources.

ii.) ***A resource determined by a lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.***

Less Than Significant with Mitigation Incorporated. The Project is subject to compliance with AB 52, which requires consideration of impacts to tribal cultural resources as defined in California Public Resources Code 21074 as part of the CEQA process, and requires LADWP to notify any groups who have requested notification of the Project who are traditionally or culturally affiliated with the geographic area of the Project. LADWP notified six Native American individuals/organizations of the Project under AB 52. These contacts were initially identified by the Native American Heritage Commission as Native

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American individuals/organizations who are traditionally or culturally affiliated with the geographic area of the Project. These contacts were notified of the Project in a good faith effort to provide an opportunity to consult on tribal cultural resources and other matters of concern. One of these contacts responded to the notification:

- Andrew Salas, Chairman, Gabrieleño Band of Mission Indians – Kizh Nation

Because AB 52 is a government-to-government process, all records of correspondence related to AB 52 notification and any subsequent consultation are on file with LADWP. Implementation of MM-CUL-1, as described under Section 3.5(a), would ensure that impacts to tribal cultural resources would be less than significant.

3.19 Utilities and Service Systems

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- b) *Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities the construction or relocation of which could cause significant environmental effects?*

Water Treatment

Less-Than-Significant Impact. Potable water for the Project would be supplied by LADWP. Primary sources of water for the LADWP service area are the Los Angeles Aqueducts, local groundwater, and purchased imported water from Metropolitan Water District. An additional fourth source, recycled water, is increasingly becoming a larger source in the overall supply portfolio. Two of the supply sources, water from the Los Angeles Aqueducts and water purchased from Metropolitan Water District, are classified as imported as they are obtained from outside LADWP's service area. Metropolitan Water District is the regional wholesale water agency, importing water from the Bay-Delta via the State Water Project, the Colorado River via the Colorado River Aqueduct, and from Water Transfers, Storage and Exchange Programs. Groundwater is local and obtained within the MWD service area. Historical supply sources are increasingly under multiple constraints including potential impacts of climate change, groundwater contamination, and reallocation of water for environmental concerns. To mitigate these impacts on supply sources, LADWP has renewed its focus on protecting and rehabilitating its local groundwater basins, including expanding the remediation efforts for the San Fernando Basin, increased stormwater capture, and indirect potable reuse. These investments will augment the City's groundwater and help ensure that basin water levels remain sustainable for the foreseeable future. (LADWP 2015).

As discussed in Section 3.10, Hydrology and Water Quality, the LADWP UWMP provides multiple-dry-year supply and demand analysis for LADWP's domestic water service area. The UWMP indicates that MWD will continue to provide 100 percent reliability through 2040 for its member agencies during average, single dry, and multiple dry year conditions. For each of these scenarios there is a projected surplus of supply in every forecast year. As stated in the UWMP and summarized in Table 3-23, Multiple Dry Year MWD Supply Capability and Projected Demands (AFY), the Project's water demand would represent a nominal percentage of the LADWP's current and future supplies, and overall, the LADWP has the water supplies to adequately serve the Project. Therefore, the demand associated with operation of the Project would be within the capacity of existing water treatment facilities; and impacts associated with the construction of new water treatment facilities would be less than significant

Wastewater Treatment

Less-Than-Significant Impact. During operation, the Project would produce wastewater that would be disposed of in the City's sewer collection system, operated and maintained by Los Angeles Department of Public Works Bureau of Sanitation (LASAN). Wastewater collected in the area is conveyed by interceptor lines and ultimately treated at City water reclamation plants, specifically, the Los Angeles–Glendale Water Reclamation

Plant and the Hyperion Water Treatment Plant. The Los Angeles–Glendale Water Reclamation Plant and the Hyperion Water Treatment Plant treat a maximum of 20 million gallons a day (MGD) and 450 MGD, respectively (LADWP 2015).

Indoor water consumption data associated with operation of the Project were provided in the CalEEMod modeling outputs included as Appendix A. The Project could consume approximately 102 million gallons of water per year, or 279,452 gallons per day. CalEEMod does not calculate wastewater generation; however, indoor water consumption conservatively represents wastewater generation in this analysis. The Project's daily wastewater generation represents a nominal percentage (0.06%) of the cumulative capacity of the Los Angeles–Glendale Water Reclamation Plant and the Hyperion Water Treatment Plant (470 MGD total).

LASAN is the National Pollutant Discharge Elimination System permit holder for the Los Angeles–Glendale Water Reclamation Plant and the Hyperion Water Treatment Plant, and it is responsible for compliance with the wastewater treatment requirements in the National Pollutant Discharge Elimination System permit, Permit No. CA0053953 (Los Angeles RWQCB 2012) and in the National Pollutant Discharge Elimination System permit, Permit No. CA0109991 (Los Angeles RWQCB 2016). Upon connection to wastewater facilities, the Project would be in compliance with the wastewater treatment requirements of the Los Angeles RWQCB. Therefore, the proposed Project would not exceed the wastewater treatment requirements of the applicable RWQCB, and impacts would be less than significant.

Thus, the proposed Project's wastewater generation would represent a nominal percentage of Los Angeles–Glendale Water Reclamation Plant and the Hyperion Water Treatment Plant's permitted treatment capacity, and no additional wastewater treatment facilities would be required as a result of the Project's wastewater generation. Therefore, impacts associated with wastewater treatment facilities would be less than significant.

Electric Power, Natural Gas, and Telecommunication Facilities

Less-Than-Significant Impact. Electric power is currently provided to the site by Southern California Edison. Natural gas is currently provided to the site by SoCalGas. Telecommunication for the site is currently provided by AT&T, which provides telephone and internet services. Project utility plans shall comply with the City's Fire Code, the latest version of the California Building Code and the City of Los Angeles Building Code; and be approved by the Los Angeles Department of Building and Safety. Point of connection to the proposed Project would be submitted to Southern California Edison, SoCalGas, and AT&T prior to construction of the proposed development. Upgrades would be confined to the lateral connections to the Project site and not any centralized facilities. Upgrades would likely be completed by either trenchless technology or completion of open trenching, to the depth of the underground utilities. The construction of the laterals would be temporary and would be subject to all applicable regulatory requirements. Impacts associated with upgrades of electric, natural gas, and telecommunication lateral connections to the Project site would be **less than significant**.

- b) *Would the Project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?*

Less-Than-Significant Impact. As stated in Section 3.19(a), potable water for the Project would be supplied by LADWP. In the UWMP, LADWP estimated that industrial uses within its water service area would demand an average of 131 gallons per day per employee in 2020, 123 gallons per day per employee in 2025, and 121 gallons per day per employee in 2030. Thus, it is expected that, as an industrial use, the proposed Project could demand approximately 59,625 gallons per day (66.79 AFY) of water in 2020. This would be a nominal percentage of LADWP's water demand forecast for all industrial uses in the service area (20,726 AFY) (LADWP 2015). As stated in the UWMP and summarized in Table 3-23, the Project's water demand would represent a nominal percentage of the LADWP's current and future supplies, and overall, the LADWP has the water supplies to adequately serve the Project. Therefore, impacts relative to water supplies would be less than significant.

- c) *Would the Project result in a determination by the wastewater treatment provider, which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?*

Less-Than-Significant Impact. As previously addressed in Section 3.19(a), the Project would produce approximately 279,452 gallons per day of wastewater. Wastewater generated within the City is treated at the Los Angeles–Glendale Water Reclamation Plant and the Hyperion Water Treatment Plant, which have a combined treatment capacity of 470 MGD. Thus, the proposed Project's wastewater generation would represent a nominal percentage of Los Angeles–Glendale Water Reclamation Plant and the Hyperion Water Treatment Plant's permitted treatment capacity, and no additional wastewater treatment facilities would be required as a result of the Project's wastewater generation. Therefore, impacts associated with wastewater treatment facilities would be less than significant.

- d) *Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

Less-Than-Significant Impact. Construction activities would generate construction waste, such as equipment packaging, construction scrap, and debris. In accordance with the City's Construction and Demolition Debris Recycling Ordinance, construction would incorporate source reduction techniques and recycling measures and would maintain a recycling program to divert waste. These measures would minimize the amount of construction debris generated by the Project that would need to be disposed of in an area landfill. Any non-recyclable and hazardous construction waste generated would be disposed of at a landfill approved to accept such materials.

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Several landfills throughout the County of Los Angeles serve the City, as listed in Table 3-34. The total permitted throughput for all landfills is 28,816 tons per day, and approximately 149.80 million tons of capacity remain (County of Los Angeles 2017).

Table 3-34. Existing Landfills

Landfill	Location	Estimated Closing Year	Maximum Permitted Daily Load (tons/day)	Current Remaining Capacity (million tons)
Antelope Valley Landfill	Palmdale	2039	3,600	12.39
Calabasas Landfill	Unincorporated Area	2029	3,500	5.60
Chiquita Canyon Landfill	Unincorporated Area	2047	6,616	59.10
Lancaster Landfill	Unincorporated Area	2041	3,000	10.27
Sunshine Canyon Landfill	Los Angeles/ Unincorporated Area	2055	12,100	68.04
Total			28,816	149.80

Source: County of Los Angeles 2017.

Solid waste generation data associated with operation of the Project were provided in the CalEEMod modeling outputs included as Appendix A. The Project could produce approximately 318.53 tons of solid waste per year, or 0.87 ton per day. Note that these estimates represent a conservative, “worst-case” scenario and do not include credit for the diversion requirements set forth by AB 939. Nonetheless, the Project’s estimated waste generation (without diversion) equates to a nominal percentage of the County landfills serving the City’s permitted throughput of 26,400 tons per day. Therefore, the Project would not generate solid waste in excess of applicable standards or in excess of the capacity of local infrastructure; impacts associated with landfill capacity would be **less than significant**.

g) *Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

No Impact. In accordance with standards and as required by regulation and law, LADWP would comply with federal, state, and local solid waste diversion, reduction, and recycling mandates. No impact would occur.

References

County of Los Angeles. 2017. *Countywide Integrated Waste Management Plan 2017 Annual Report*. April 2019.
<https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=6530&hp=yes&type=PDF>.

LADWP (Los Angeles Department of Water and Power). 2015. *Mid Valley Water Facility Conceptual Design Report*. Revision D. Task Order ESC-33. Prepared by CDM Smith. August 28, 2015.

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Los Angeles RWQCB (Regional Water Quality Control Board). 2012. Tentative Amended Waste Discharge Requirements and NPDES Permit for the City of Los Angeles, Los Angeles–Glendale Water Reclamation Plant (NPDES No. CA0053953). May 1, 2012. [http://www.swrcb.ca.gov/rwqcb4/board_decisions/tentative_orders/individual/npdes/losangeles_glendale/2012/LAGWRP%20CA0053953%20\(F.Coliform%20Revision\)%20Mailout%20Letter%205-01-12.pdf](http://www.swrcb.ca.gov/rwqcb4/board_decisions/tentative_orders/individual/npdes/losangeles_glendale/2012/LAGWRP%20CA0053953%20(F.Coliform%20Revision)%20Mailout%20Letter%205-01-12.pdf).

Los Angeles RWQCB. 2016. Waste Discharge Requirements and NPDES Permit for the City of Los Angeles, Hyperion Treatment Plant Discharge to the Pacific Ocean (NPDES No. CA0053953). August 30, 2016. http://www.swrcb.ca.gov/rwqcb4/board_decisions/tentative_orders/individual/npdes/hyperion/2016/TentativeHyperionNPDESCI-149208-30-16.pdf.

3.20 Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) *Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?*

No Impact. According to CALFIRE’s Los Angeles County Fire Hazard Severity Zone Map, the Project site is designated as a Non-Very High Fire Severity Zone. Furthermore, the *City of Los Angeles General Plan Safety*

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Element states that no wildland fire hazard areas occur within the Project site or near the Project site (City of Los Angeles 1996). As such, no impact would occur.

- b) *Due to slope, prevailing winds, and other factors, would the Project exacerbate wildfire risks, and thereby expose Project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?***

No Impact. The Project is not located within or near a state responsibility area classified as a very high fire severity zone. As such, no impact would occur.

- c) *Would the Project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?***

No Impact. The Project is not located within or near a state responsibility area classified as a very high fire severity zone. As such, no impact would occur.

- d) *Would the Project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?***

No Impact. The Project is not located within or near a state responsibility area classified as a very high fire severity zone. As such, no impact would occur.

References

City of Los Angeles. 1996. "Safety Element." In *City of Los Angeles General Plan*. Adopted November 26, 1996.
http://planning.lacity.org/GP_elements.html.

3.21 Mandatory Findings of Significance

Does the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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Does the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
b) Have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) *Does the Project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?*

Less Than Significant with Mitigation Incorporated. According to the CNDDDB, four special-status wildlife species have been identified within a 2-mile radius of the Project site. However, none of these species are state- or federally listed, nor are there any documented occurrences of special-status species within the Project site itself (CDFW 2018). Additionally, no special-status plants are anticipated to occur within the Project site. The Project site is disturbed and subject to routine disturbances associated with disking, mowing, and other vegetation removal activities. There are also no documented occurrences of special-status plant species within a 2-mile radius of the Project site (CDFW 2018).

Nevertheless, impacts to nesting bird and raptor species would be considered potentially significant if implementation of the proposed Project would require removal or substantial trimming of healthy mature trees with active nests during the bird nesting season. Thus, **MM-BIO-1** is set forth to ensure that nesting birds would not be impacted by the proposed Project activities; and thus, impacts would be less than significant with mitigation incorporated.

As per the LADWP Conceptual Design Report (2015), California sycamore is the only native tree protected under the City of Los Angeles Protected Tree Ordinance that occurs within the proposed Project site. The single, isolated California sycamore tree is proposed for removal. As such, the proposed Project would result in direct impacts to a tree protected under the City of Los Angeles Protected Tree Ordinance. **MM-BIO-2**, which requires a tree inventory and obtaining a permit for tree removal, is set forth to minimize impacts to

protected trees. Impacts associated with local policies or ordinances protecting biological resources would therefore be less than significant with mitigation incorporated.

As described in Section 3.5 of this MND, the Project site does not support any important examples of major periods in California history. While there are no known important examples of California prehistory on the Project site, there is the potential for previously unknown resources to be encountered on the site during the minor ground disturbing activities associated with construction of the Project. Implementation of **MM-CUL-1**, would ensure that such resources would be protected, in the event that they were unexpectedly discovered on the Project site. Therefore, impacts to California prehistory would be less than significant with implementation of **MM-CUL-1**.

- b) *Does the Project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?*

Less Than Significant with Mitigation Incorporated. As determined in the analysis presented in this MND, the proposed Project would not result in significant impacts in any resource areas upon implementation of mitigation measures; therefore, there would be no cumulatively considerable effects.

- c) *Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

Less-Than-Significant Impact with Mitigation Incorporated. The analysis presented in this document does not identify significant adverse impacts on human beings upon implementation of mitigation measures. The impacts were characterized as absent or less than significant. Therefore, the Project would not have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly.

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