FINAL INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION

City Trunk Line South Unit 5 Phase II and Unit 6 Project

PREPARED BY

Los Angeles Department of Water & Power

Environmental Affairs
111 North Hope Street, Room 1044
Los Angeles, California 90012

WITH ASSISTANCE FROM

DUDEK

38 North Marengo Avenue
Pasadena, California 91101

JULY 2020

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ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
AB	Assembly Bill
AQMP	Air Quality Management Plan
BMP	best management practice
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation
CARB	California Air Resources Control Board
CEQA	California Environmental Quality Act
CFRP	carbon fiber reinforced polymer
CGS	California Geological Survey
CH_4	methane
City	City of Los Angeles
CO	carbon monoxide
CO_2	carbon dioxide
CO_{2e}	carbon dioxide equivalent
dB	decibel
dBA	A-weighted decibel
EIR	Environmental Impact Report
GHG	greenhouse gas
GWP	global warming potential
IS	Initial Study
LACM	Natural History Museum of Los Angeles
LADOT	City of Los Angeles Department of Transportation
LADWP	Los Angeles Department of Water and Power
L_{eq}	equivalent continuous sound level
LOS	level of service
LST	localized significance threshold
LUST	leaking underground storage tank
MM	mitigation measure
MMRP	Mitigation Monitoring and Reporting Program
MND	Mitigated Negative Declaration
MT	metric ton
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards

Acronym/Abbreviation	Definition
NF_3	nitrogen trifluoride
NO_2	nitrogen dioxide
NO_x	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
O_3	ozone
OPR	Governor's Office of Planning and Research
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)
project	City Trunk Line South Unit 5 Phase II and Unit 6 Project
ROW	right-of-way
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAR	Sewer Capacity Availability Request
SCAQMD	South Coast Air Quality Management District
SF_6	sulfur hexafluoride
SO_2	sulfur dioxide
SO_x	oxides of sulfur
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TCR	Tribal Cultural Resource
UAIZ	Urban Agriculture Incentive Zone
US 101	U.S. Highway 101
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOC	volatile organic compound
WATCH	Work Area Traffic Control Handbook
WSP	welded steel pipe

PREFACE & ERRATA TO THE FINAL IS/MND

The Final Initial Study / Mitigated Negative Declaration (IS/MND) is an informational document intended to disclose the environmental consequences of approving and implementing the City Trunk Line South Unit 5 Phase II and Unit 6 Project (proposed project). This document has been prepared in accordance with the California Environmental Quality Act (CEQA) as outlined below. The Los Angeles Department of Water and Power (LADWP) is the lead agency under CEQA.

Public Review Period

The IS/MND for the proposed project was distributed on April 16, 2020, for public review pursuant to CEQA. The public review period concluded on May 18, 2020. The IS/MND was distributed to interested or involved public agencies and organizations for review. Additionally, a Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) was mailed to addresses adjacent to and within the vicinity of the project. The NOI was filed with the city and county clerks, and the IS/MND was made available for general public review at the LADWP Environmental Affairs Division (111 North Hope Avenue, Room 1044, Los Angeles, California 90012). In addition, an electronic version of the Draft IS/MND was made available on the LADWP website at: http://www.ladwp.com/envnotices.

During the public review period, nine comment letters were received. Two late letters were received. Responses to comments that address environmental issues in the IS/MND are included in this Final IS/MND in Section 5.0. LADWP has also prepared a mitigation monitoring and reporting program (MMRP) pursuant to CEQA Guidelines, Section 15074(d), which requires that a lead or responsible agency adopt a mitigation monitoring plan when approving or carrying out a project when an MND identifies measures to mitigate or avoid significant environmental effects. The MMRP constitutes Section 6.0 of the Final IS/MND.

CEQA Guidelines Regarding Recirculation

Pursuant to CEQA Guidelines, Section 15073.5, the lead agency is required to recirculate an IS/MND when the document is substantially revised after public notice of its availability but prior to its adoption. A substantial revision is identified as follows: (1) a new avoidable significant effect is identified and mitigation measures or project revisions must be added in order to reduce the effect to insignificance or (2) the lead agency determines that the proposed mitigation measures or project revisions will not reduce potential effects to less than significant and new measures or revisions must be required.

LADWP has determined that based on CEQA Guidelines Section 15073.5, recirculation of the IS/MND prior to adoption is not required. This conclusion is based on the fact that no new, avoidable significant effects have been identified, no new mitigation measures were added, and the text of the document has not been substantially revised in a manner requiring recirculation. While minor changes have been made to the document in this Final IS/MND,

LADWP has evaluated these changes and has determined that none of these changes would alter the impact conclusions in the IS/MND or otherwise warrant recirculation. The changes that have been made to the document subsequent to its publication in April 2020 are shown in the Errata section that follows.

Following this Preface, the original text of the IS/MND is included in its entirety. No changes have been made subsequent to the release of the Draft IS/MND for public review, aside from the revisions shown in the Errata below and the addition of Chapter 5 (Response to Comments Received) and Chapter 6 (Mitigation Monitoring and Reporting Program).

Errata

At the time of the Draft IS/MND, the proposed flow control station vault at the LADWP-owned property (3380 Coldwater Canyon Avenue) was in the conceptual design phases. Subsequent to publication of the Draft IS/MND, more detailed engineering designs for this project component have been completed. This new information has not changed the impact conclusions, mitigation measures, or analysis in the IS/MND. However, this information has enabled additional details to be added to the Biological Technical Report (Appendix B of the IS/MND). Details have also been added to the Biological Technical Report based on comments received during the public review period for the Draft IS/MND, and a number of typographical errors have been resolved. The text below shows additions that have been made to the Biological Technical Report based on information that has become available subsequent to the Draft IS/MND, changes made in response to comments received during public review, and corrections of typographical errors.

As demonstrated below, these additional details represent clarification and amplification of the information that was originally presented in Appendix B of the Draft IS/MND. These edits have not changed the impact conclusions in the IS/MND, nor have they revealed a need for new or altered mitigation measures. Rather, this information merely amplifies and clarifies information and conclusions that were already presented in the Draft IS/MND. As such, these changes would not result in a new significant impact or in an increase in the severity of a previously identified significant impact and, therefore, do not warrant recirculation of the IS/MND.

Revisions to the Draft IS/MND are shown below and are categorized by section number and page number. Text from the Draft IS/MND that has been removed is shown in strikethrough (i.e., ~~strikethrough~~), and text that has been added as part of the Final IS/MND is shown as underlined (i.e., underline).

Appendix B (Biological Technical Report), Section 6.1 (Vegetation Communities and Land Covers), first paragraph:

One vegetation community and two land cover types were mapped within the action area based on general physiognomy and species composition: coast live oak–southern California walnut woodland (disturbed *Quercus agrifolia – Juglans californica* association), upland mustards and other ruderal forbs, urban/developed land, and park and ornamental plantings. ~~This~~ These land cover types ~~is~~ are described below and acreages within the ~~project site and~~ action area are presented in Table 2, Vegetation Communities and Land Covers Summary. Spatial distribution of this land cover type is presented on Figure 3, Biological Resources.

Table 2. Vegetation Communities and Land Covers Summary

Vegetation Community / Land Cover Type	California Natural Community Codes[a]	Nature-Serve Global-State Rarity Ranks[b]	Action Area (Acres)
Disturbed Coast Live Oak - Southern California Walnut Woodland Association (dQA-JC)	71.060.27	~~G3~~G3/S3	7.38

Upland Mustards and Other Ruderal Forbs (UM)	42.011.05	—	2.07
Urban/Developed Land (DEV)	—	—	46.88
Parks and Ornamental Plantings (ORN)	—	—	0.51

Notes: Numbers may not sum due to rounding.

[a] Unique codes assigned to alliances and associations.

[b] NatureServe Global and State rarity ranks per Faber-Langendoen et al. (2012). Natural communities with ~~global or~~ state ranks of 1–3 are considered Sensitive Natural Communities by CDFW and are to be addressed in the environmental review processes of CEQA (CDFW 2020).

Appendix B (Biological Technical Report), Section 6.1.1 (Disturbed Coast Live Oak – Southern California Walnut Woodland Association), first paragraph:

~~Disturbed~~ Coast Live Oak-Southern California Walnut Woodland Association is only known from the Santa Monica Mountains region. This woodland association occurs on moderately steep to very steep slopes with variable aspects. It is dominated by coast live oak and southern California black walnut in the tree layer that constitute from zero to 72 percent of the vegetation cover within the community (Keeler-Wolf, T., and J. Evens 2006). Poison oak (*Toxicodendron diversilobum*) is characteristic in the understory shrub layer and a variety of grasses and forbs occur in the herbaceous layer (Keeler-Wolf, T., and J. Evens 2006). This community is considered sensitive by CDFW (~~2018~~2020).

Appendix B (Biological Technical Report), Section 6.1.2 (Upland Mustards and Other Ruderal Forbs), first paragraph:

Upland mustard (semi-natural stands) is a naturalized vegetation community dominated by a thick layer of herbaceous mustard plants and few other plant species interspersed within an open to continuous canopy. Emergent trees and shrubs may be present at low cover (CNPS 2019b). This habitat often occurs in fallow fields, grasslands, roadsides, levee slopes, disturbed coastal scrub riparian areas, and dumping sites. Characteristic plant species in this community include black mustard (*Brassica nigra*), field mustard (*Brassica rapa*), Asian mustard (*Brassica tournefortii*), shortpod mustard, dyer's woad (*Isatis tinctoria*), and cultivated radish (*Raphanus sativus*) (CNPS 2019b). Black mustard, shortpod mustard, cultivated radish, or other mustards occur with non-native plants at greater than 80-percent relative cover in the herbaceous layer, and mustards are the dominant herbs.

Appendix B (Biological Technical Report), Section 7.2 (Impacts to Vegetation Communities and Land Covers), first paragraph:

Direct and Indirect Impacts

The project site and surrounding action area supports one sensitive vegetation community (coast live oak–southern California walnut woodland association), found within the LADWP-owned property located at 3380 Coldwater Canyon Avenue within the proposed Unit 6 alignment. Due to the proposed installation of the flow control station vault, the project would permanently impact 0.01 acres of coast live oak–southern California walnut woodland association

(including several coast live oak and southern California black walnut trees) and would temporarily impact 0.18 acres of coast live oak–southern California walnut woodland association. As such, the project would result in a potentially significant impact to sensitive vegetation communities. (See Figure 5, Impacts to Sensitive Vegetation Communities). The understory of the community within the action area has been regularly disturbed due to fuel reduction required for the surrounding residential properties, which has resulted in nonnative, invasive grass and herbaceous annual species to dominate. As such, ~~Since~~ project impacts would only occur to the tree component of the community (coast live oak and southern California black walnut), which are also trees protected by the City's Protected Tree Ordinance (City of Los Angeles 2006a)., ~~direct and indirect impacts to sensitive vegetation communities are discussed in Section 7.7.~~ Mitigation for impacts to coast live oak and southern California black walnut are discussed in Section 8.5. This mitigation would address and reduce the project's impacts to coast live oak–southern California walnut woodland association to below a level of significance. The permanent loss of 0.01 acres of understory dominated by nonnative, invasive species is not significant based upon the small area and the species composition being removed. The 0.18 acres of temporary impacts to the understory would be expected to revert to the existing conditions due to the nature of the nonnative, invasive species present, so the impact would not be significant. As such, impacts to the coast live oak–southern California walnut woodland association would be less than significant after mitigation for impacts to trees; impacts to the understory of this association would not be considered significant and would not require mitigation. Overall, impacts to sensitive vegetation communities would be less than significant with mitigation.

Appendix B (Biological Technical Report), Section 9 (Literature Cited):

~~CDFW (California Department of Fish and Wildlife). 2018. California Natural Community List, October 15, 2018. Accessed August 2019. https://www.wildlife.ca.gov/Data/VegCAMP/Natural-Communities.~~

CDFW. 2020. Natural Communities. Accessed June 2020. https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities.

Appendix B (Biological Technical Report), Figures:

Figure 5, referenced above, is shown on the following page and has been added to the Biological Technical Report as part of this Final IS/MND.

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SOURCE: Bing Maps 2019, Open Street Map 2019

LA DWP Los Angeles Department of Water & Power

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Figure 5

Impacts to Sensitive Vegetation Communities

City Trunk Line South Unit 5 Phase II and Unit 6 Project

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Record of Proceedings

The documents and other materials that constitute the record of proceedings upon which LADWP's project approval is based are located at the address below:

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

The LADWP's Environmental Affairs office is the custodian of such documents and other materials that constitute the record of proceedings. The location of and custodian of the documents or other materials that constitute the record of proceedings for the proposed project is provided in compliance with CEQA Guidelines Section 15074(c).

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1 INTRODUCTION

1.1 Project Overview

The Los Angeles Department of Water and Power (LADWP) is proposing the City Trunk Line South Unit 5 Phase II and Unit 6 Project (proposed project) in the Studio City neighborhood of the City of Los Angeles (City), Los Angeles County. Implementation of the proposed project would improve capacity, reliability, and flexibility in the water system, and would complete the LADWP's six-phase plan to replace the existing Los Angeles City Trunk Line, which connects the Los Angeles Aqueduct Filtration Plant to the Franklin Reservoir. The proposed project would include the replacement of the existing large-diameter potable water trunk line using the open trench and the pipe jacking methods. The proposed project would also include the installation of a flow control station, the structural relining of portions of the existing pipeline, and interior improvements within the existing Coldwater Canyon Pump Station.

The proposed project components are described, as follows:

City Trunk Line South: Unit 5, Phase II

- The installation of 20 feet of 64-inch welded steel pipe (WSP) for the tie-in connection within the Coldwater Canyon Avenue public right-of-way (ROW), north of Moorpark Street, using the open trench method.
- The installation of 620 linear feet of 60-inch WSP within Coldwater Canyon Avenue starting at Ventura Boulevard and ending at Valleyheart Drive South, using the pipe jacking method.
- The structural relining with carbon fiber reinforced polymer (CFRP) of 175 linear feet of the existing 62-inch riveted steel pipe where Coldwater Canyon Avenue crosses the Los Angeles River.
- The installation of 50 linear feet of 60-inch WSP for the tie-in connections within Coldwater Canyon Avenue at Dickens Street, using the open trench method.

City Trunk Line South: Unit 6

- The installation of 60 linear feet of 60-inch WSP for the tie-in connection to the southerly terminus of the City Trunk Line South, Unit 5, Phase I, in Coldwater Canyon Avenue, using the open trench method.
- The removal and replacement of the existing Flow Control Station within Oeste Avenue with 200 linear feet of 60-inch WSP, using the open trench method.
- The structural relining with CFRP of 675 linear feet of 60-inch WSP; 334 linear feet of 51-inch WSP; and, 688 linear feet of 62-inch riveted steel pipe.
- The installation of an approximately 43.5 x 34 x 23-foot, flow control station vault on the LADWP-owned property, located at 3380 Coldwater Canyon Avenue, Studio City.

- Interior improvements within the existing Coldwater Canyon Pump Station (located along Oeste Avenue), consisting of the removal of four existing pump units, installation of four new pump units, replacement of valves within the pump station, and replacement of piping to accommodate the new pumps.
- The proposed project would connect the new, large-diameter water trunk line segments to the previously implemented City Trunk Line South Unit 5, Phase 1 project, which was completed in March 2016. Implementation of the proposed project would improve capacity, reliability, and flexibility in the water system, and would complete the LADWP's six-phase plan to connect the Los Angeles Aqueduct Filtration Plant to the Franklin Reservoir.

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 21065). LADWP, as a municipal utility, would implement and operate the proposed project as the CEQA lead agency. LADWP would also fund the proposed project but may also seek funding from available sources, which may include the State Water Resources Control Board's (SWRCB) Drinking Water State Revolving Fund. SWRCB uses the CEQA review process and compliance with federal environmental laws and regulations to satisfy the environmental requirements for the Drinking Water State Revolving Fund Program Operating Agreement between the United States Environmental Protection Agency and SWRCB. As a result, and in addition to the CEQA review process, federal crosscutting requirements are often a part of the environmental review for projects that are funded through the Drinking Water State Revolving Fund Program. Therefore, applications for funding must include proof of CEQA compliance and of compliance with federal requirements. Collectively, the process is termed "CEQA+" due to the addition of federal crosscutting studies to CEQA requirements.

An Initial Study has been prepared by LADWP as the lead agency in accordance with the CEQA Guidelines to evaluate potential environmental effects and to determine whether an Environmental Impact Report or a Negative Declaration or Mitigated Negative Declaration (MND) should be prepared for the proposed project. The Initial Study would also satisfy CEQA requirements for agencies that would provide sources of funding for the proposed project or that would otherwise have discretionary approval authority over the project. An MND is prepared for a project when an Initial Study has identified potentially significant effects on the environment, but (1) revisions in the project plans or proposals made by, or agreed to by, the applicant before the proposed 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 effect on the environment would occur; and (2) there is no substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment.

The Initial Study determined that the implementation of the proposed project could cause some potentially significant impacts on the environment but, as shown in the environmental analysis contained in this Initial Study/Mitigated Negative Declaration (IS/MND), all of the project's potentially significant impacts would be reduced to less than significant levels through the implementation of mitigation measures. Consequently, the analysis contained herein concludes that an MND shall be prepared for the proposed project.

This document consists of both the Initial Study for the project and the MND. This IS/MND is composed of four sections. Section 1 provides an introduction to the proposed project, general information about the contents of the IS/MND, information about the lead agency, the project location, and the environmental setting. Section 2 provides a description of the proposed project components and information about their construction and operation. Section 3 consists of the CEQA Initial Study checklist, which provides the assessment of potential environmental impacts and the applicability of mitigation measures to reduce potentially significant impacts to less than significant. Section 4 provides a list of the lead agency staff and consultants involved in preparing the environmental review documents for the proposed project. This document also includes several appendices that contain technical resource reports related to air quality and greenhouse gas (GHG) emissions, biological resources, cultural resources, and noise. Several of the technical resource reports have been prepared in compliance with CEQA+ federal crosscutting requirements, to support an application for SWRCB funding, in the event that such funding is pursued.

1.3 Project Location

Proposed Project Site

The proposed project would be located in the Studio City neighborhood of Los Angeles, in the southeastern portion of the San Fernando Valley, approximately 15 miles northwest of Downtown Los Angeles, as shown in Figure 1-1, Project Location. As shown in Figure 1-1, the Unit 5, Phase II alignment of the proposed project would be located within the Coldwater Canyon Avenue public ROW and runs south for approximately 1,500 feet from immediately north of Ventura Boulevard, across the Los Angeles River, to terminate at the intersection of Coldwater Canyon Avenue and Dickens Street. Additionally, as shown in Figure 1-1, Unit 5 Phase II would include an additional 20-foot segment, located north of Moorpark Street where a new tie-in connection would connect the existing 64-inch City Trunk Line to the existing 54-inch trunk line.

The Unit 6 alignment would begin approximately 0.5 miles south of the Unit 5, Phase II alignment, and would run south within the public ROW of Coldwater Canyon Avenue, Avenida Del Sol and Oeste Avenue before terminating at the LADWP-owned property, located at 3380 Coldwater Canyon Boulevard as shown in Figure 1-1.

Major freeways in the project vicinity include U.S. Highway 101 (US 101) South, which runs in a southeasterly direction approximately 0.5 miles north of the project site and Interstate 405, which runs north/south approximately 3 miles east of the project alignment.

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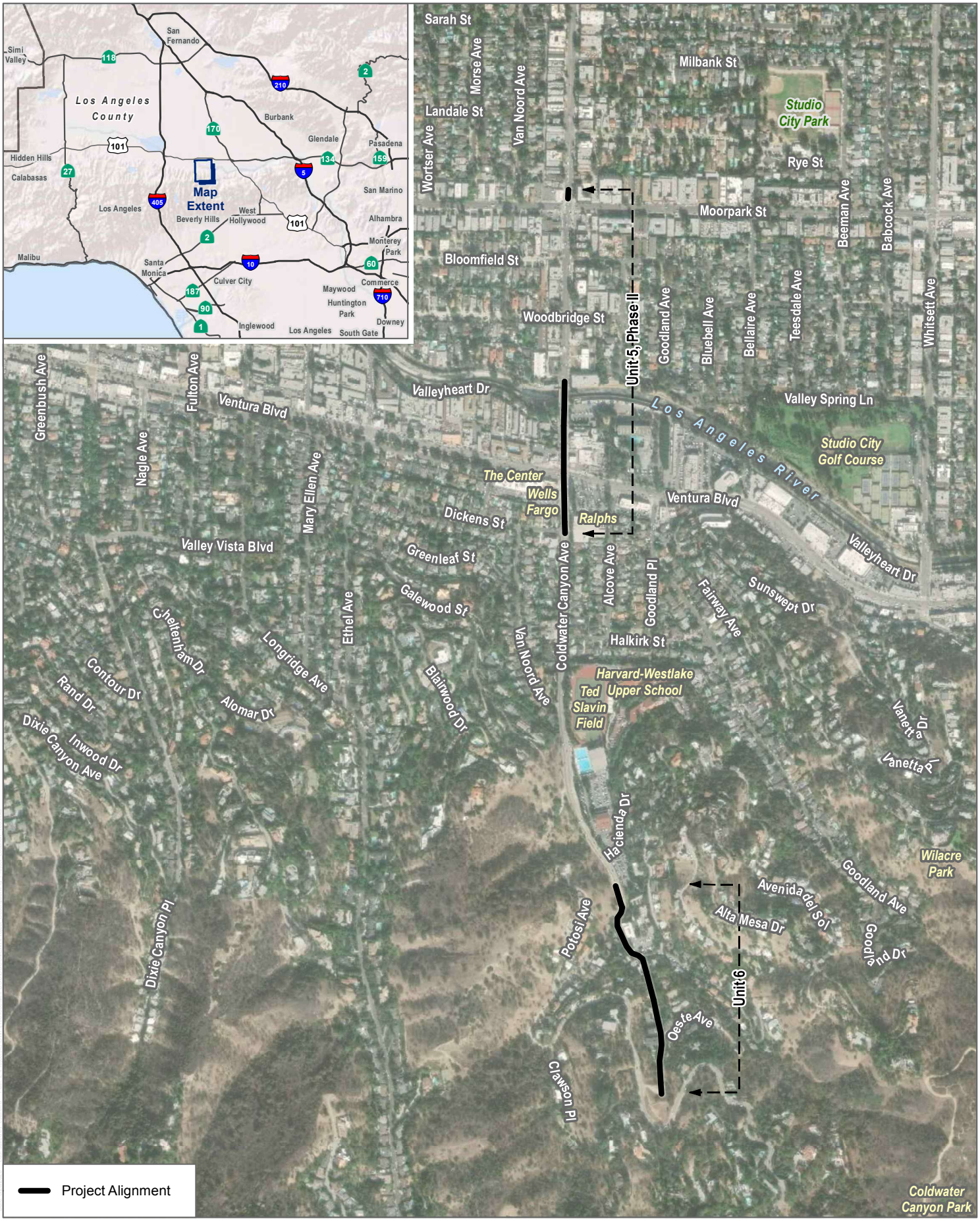

SOURCE: Bing Maps 2019, Open Street Map 2019

Los Angeles Department of Water & Power

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FIGURE 1-1

Project Location

City Trunk Line South Unit 5 Phase II and Unit 6 Project

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1.4 Environmental Setting

The proposed pipeline replacement would occur within the public ROW, underneath an existing bridge within Coldwater Canyon Avenue crossing the Los Angeles River, and within LADWP property at 3380 Coldwater Canyon Avenue in the Studio City area of the City of Los Angeles. The environmental setting of the project area is described below.

Unit 5, Phase II: The proposed pipeline replacement for Unit 5, Phase II would occur within the public ROW of Coldwater Canyon Avenue. The Citywide General Plan Circulation System Map for the Valley Subarea maps Coldwater Canyon Avenue as an "Avenue II" (City of Los Angeles 2016). The portion of Coldwater Canyon Avenue that would accommodate the proposed Unit 5, Phase II alignment, is four lanes in width, with additional dedicated turn lanes. There are sidewalks on both sides of the street, including on either side of Coldwater Canyon Avenue Bridge over the Los Angeles River. There is no on-street parking provided along the portions of the roadway that are included in the proposed project.

Unit 6: The proposed pipeline replacement for Unit 6 would occur within the public ROW of Coldwater Canyon Avenue, Avenida Del Sol, Oeste Avenue, and within LADWP property at 3380 Coldwater Canyon Avenue. The City of Los Angeles Citywide General Plan Circulation System Map for the Valley Subarea identifies Coldwater Canyon Avenue as an "Avenue II" and as a scenic highway where it traverses through the Santa Monica Mountains, adjacent to the proposed Unit 6 alignment (City of Los Angeles 2016). Coldwater Canyon Avenue is not a State Designated Scenic Highway. The small segment of Coldwater Canyon Avenue that would accommodate the proposed Unit 6 alignment is one lane in each direction with dedicated turn lanes. There are no sidewalks on either side of the street and there is no on-street parking provided. The Citywide General Plan Circulation System Map for the Valley Subarea, maps Avenida Del Sol and Oeste Avenue as "local/other streets" (City of Los Angeles 2016). Both Avenida Del Sol and Oeste Avenue comprise one narrow, unmarked lane with no public sidewalks and no designated on-street parking.

Surrounding Land Uses

The proposed project alignment is generally surrounded by City-designated "Commercial" and "Residential" land uses, with small segments of the proposed project alignment that traverse areas of "Open Space" and "Parking" as shown in Table 1-1 (City of Los Angeles 2019) and illustrated in Figure 1-2, Surrounding Land Uses, and Figure 1-3, Zoning. The proposed Unit 5, Phase II alignment is generally surrounded by multi-family residential and small segments of strip commercial and civic (City of Los Angeles Department of Water and Power, Station 46) land uses. This portion of the project traverses the channelized Los Angeles River. The proposed Unit 6 alignment generally traverses through single-family residential land uses; however, the St. Michaels and All Angels Episcopal Church and Sunnyside Pre-school are located immediately north of Unit 6's northern terminus. Other nearby schools include Harvard-Westlake Upper School, located at 3700 Coldwater Canyon Avenue; The Emerson Academy for Arts and Sciences, located at 12749

Ventura Boulevard; and, WISH private school, located at 12817 Moorpark Street. The Harvard-Westlake Upper School is located on Coldwater Canyon Avenue, approximately 0.33 miles south of the proposed Unit 5, Phase II alignment and 0.2 miles north of the proposed Unit 6 alignment. There is open space located to the east (Wilacre Park) and the west (Coldwater Canyon Open Space) of the residential land that lies adjacent to the Unit 6 segment of the alignment.

Table 1-1. Surrounding Land Use Zoning and Designations

Applicable Alignment Segment	General Plan Land Use Designation	General Plan Zoning
Unit 5, Phase II		
20-foot segment within Coldwater Canyon Avenue, north of Moorpark road.	**Commercial:** Retail with limited manufacturing, service stations and garages, retail contributors, business, churches, schools, auto sales, and multiple dwelling for schools, childcare and homeless shelters.	C2
Segment within Coldwater Canyon Avenue from south of Woodbridge, over the Los Angeles River, to Ventura Boulevard.	**Restricted Density Multiple Dwelling:** One-family dwellings, two-family dwellings, apartment houses, multiple dwellings, home occupations.	RD1.5
	Limited Commercial: < 100,000 sq-ft, offices or businesses, hotels, hospitals and/or clinics, parking areas, schools, museums, retail, theaters, broadcasting studios, parking buildings, parks and playgrounds, multiple dwelling, banks, clubs, and childcare.	C1.5
	Open Space (Los Angeles River): Parks and recreation facilities, nature reserves, closed sanitary landfill sites, public water supply reservoirs, and water conservation areas.	OS
Segment within Coldwater Canyon Avenue from Ventura Boulevard to Dickens Street.	**Limited Commercial:** < 100,000 sq-ft, offices or businesses, hotels, hospitals and/or clinics, parking areas, schools, museums, retail, theaters, broadcasting studios, parking buildings, parks and playgrounds, multiple dwelling, banks, clubs, and childcare.	C1.5
	Automobile Parking – Surface and Underground: Surface Parking; Parking Buildings if located below grade.	P
	One-family Residential: One-family dwellings, parks, playgrounds, community centers, truck gardening, and home occupations	R1

Table 1-1. Surrounding Land Use Zoning and Designations

Applicable Alignment Segment	General Plan Land Use Designation	General Plan Zoning
Unit 6		
Entire unit 6 alignment from Coldwater Canyon Avenue south through Avenida Del Sol and Oeste Avenue.	**One-family Residential:** One-family dwellings, parks, playgrounds, community centers, truck gardening, accessory living quarters and home occupations	R1 and R40

Source: City of Los Angeles 2019

References

City of Los Angeles. 2016. General Plan Circulation System Map (Valley Subarea). Accessed, June 21, 2019. https://planning.lacity.org/documents/policy/mobilityplnmemo.pdf.

City of Los Angeles. 2019. ZIMAS database. Accessed, June 21, 2019. http://zimas.lacity.org.

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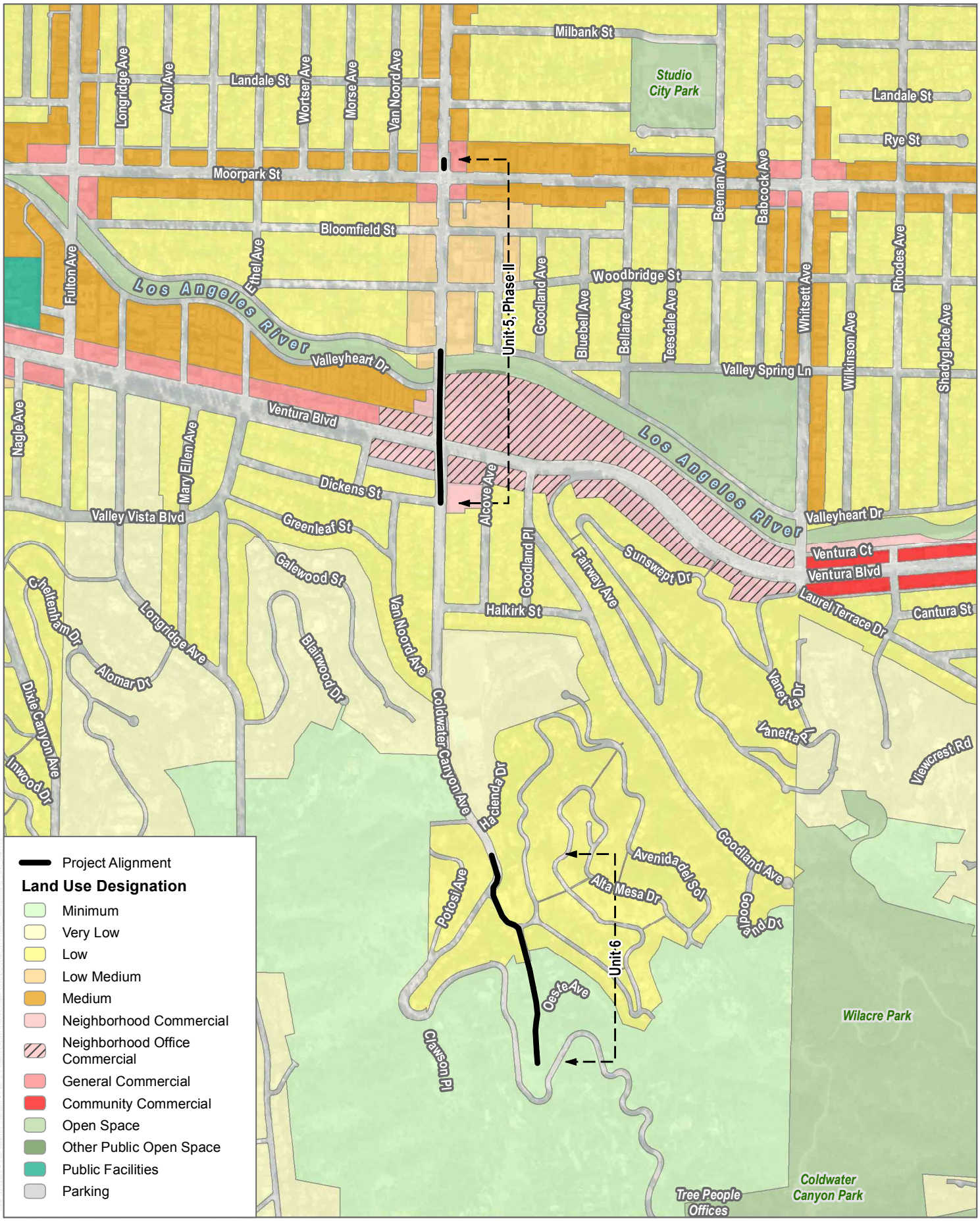

SOURCE: Bing Maps 2019, Open Street Map 2019

Los Angeles Department of Water & Power

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FIGURE 1-2

Surrounding Land Uses

City Trunk Line South Unit 5 Phase II and Unit 6 Project

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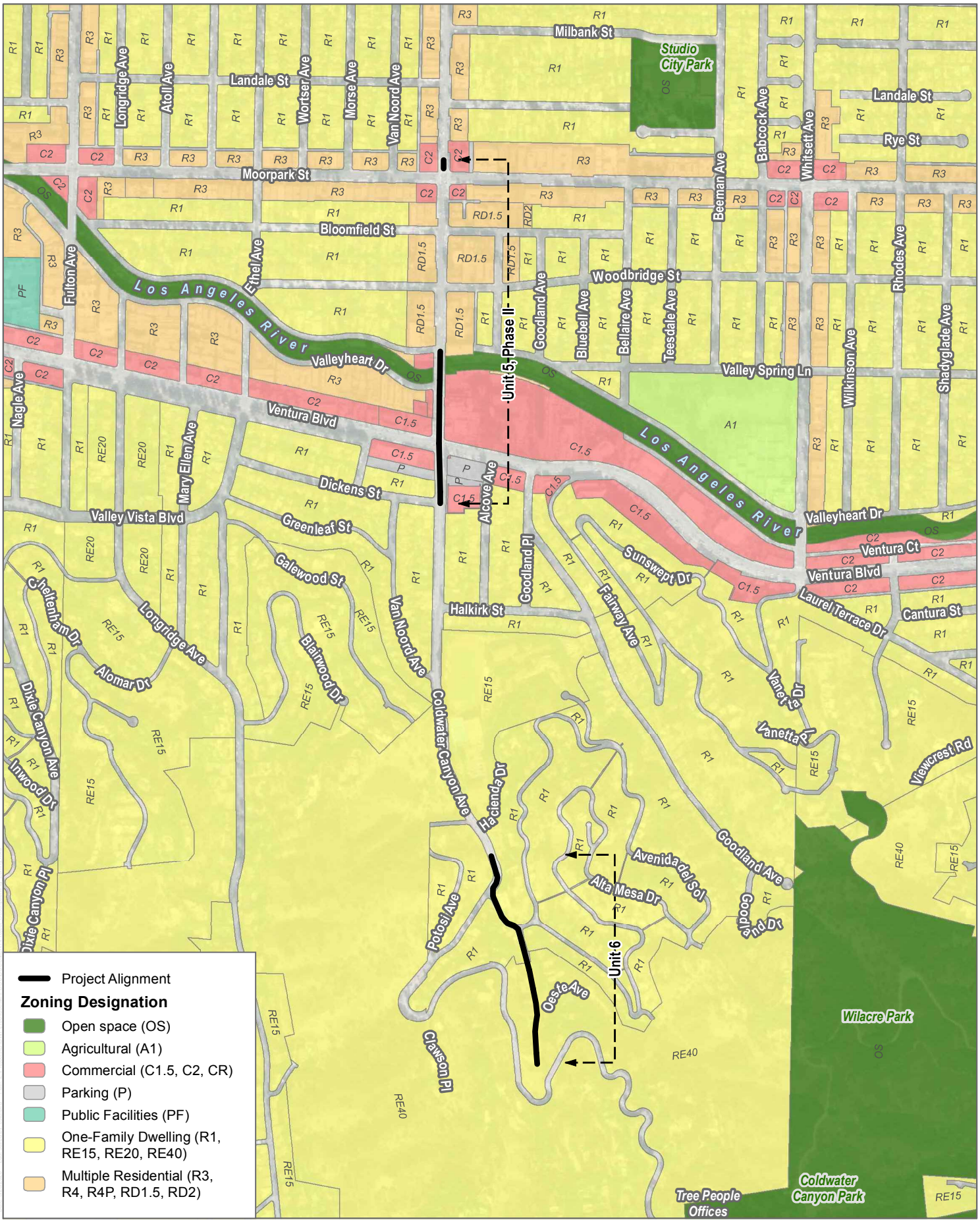

SOURCE: Bing Maps 2019, Open Street Map 2019

Los Angeles Department of Water & Power

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FIGURE 1-3

Zoning

City Trunk Line South Unit 5 Phase II and Unit 6 Project

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2 PROJECT DESCRIPTION

2.1 Background

The original Los Angeles City Trunk Line was installed in 1914 to serve the City of Los Angeles with water delivered by the Los Angeles Aqueduct to the Lower San Fernando Reservoir (later renamed the Lower Van Norman Reservoir), located in what is now the Van Norman Complex. The trunk line traversed the eastern San Fernando Valley from the reservoir to the Santa Monica Mountains, providing direct supply to areas of the Western Valley as well as functioning as a primary transmission conduit for water for central areas of the City through connections to the Franklin Reservoir Tunnel and, later, the North Hollywood Pump Station. The northern portion of the Los Angeles City Trunk Line, from the Van Norman Complex in the Granada Hills community of Los Angeles to the Tujunga Spreading Grounds in the Sun Valley community of Los Angeles, will be replaced under a separate project called City Trunk Line North.

The southern portion of the Los Angeles City Trunk Line, known as City Trunk Line South, starts near the Tujunga Wash at the intersection of Canterbury Avenue and Nagel Avenue, and terminates at the Franklin Tunnel. It is in an advanced stage of deterioration, which has resulted in recurring leaks and breaks. As such, LADWP implemented the six-phase City Trunk Line South Project, whereby needed improvements to, and replacements of, the existing large-diameter pipeline have been implemented, as shown in Table 2-1. The proposed project evaluated under this IS/MND comprises Unit 5, Phase II and Unit 6 of the City Trunk Line South Project.

Table 2-1. City Trunk Line South Project Overview

City Trunk Line South Project Phase	Description	Construction/Implementation Date	Status
City Trunk Line South, Unit 1	Upgrading 10,330 linear feet of 66-inch diameter pipe within the Coldwater Canyon Avenue ROW from immediately north of Roscoe Boulevard to immediately south of Sherman Way.	September 2004 - November 2007	Completed. In service.
City Trunk Line South, Unit 2	Upgrading 9,979 linear feet of 54-, 60-, and 66-inch diameter pipe within the Coldwater Canyon Avenue ROW from immediately south of Sherman Street to Vanowen Street and within the Vanowen Street ROW from Coldwater Canyon Avenue to immediately west of Lankershim Boulevard.	January 2009 - May 2012	Completed. In service.
City Trunk Line South, Unit 3	Upgrading 10,251 linear feet of 60-inch diameter pipe in the Whitsett Avenue ROW from Vanowen Street to Magnolia Boulevard.	July 2016 – February 2022	Construction Phase

Table 2-1. City Trunk Line South Project Overview

City Trunk Line South Project Phase	Description	Construction/Implementation Date	Status
City Trunk Line South, Unit 4	Phase I: Upgrading 7,257 linear feet of pipe within the Magnolia Boulevard and Whitsett Avenue ROW from Magnolia Boulevard to Moorpark Street.	October 2008 – September 2016	Construction
	Phase II: Upgrading 1,500 linear feet of 54- and 60-inch pipe in the Magnolia Boulevard and Whitsett Avenue ROW.	July 2015 – April 2017	Completed
City Trunk Line South, Unit 5	Phase I: Upgrading 6,372 linear feet of 54- and 60-inch diameter pipe within the Moorpark Street and Coldwater Canyon Avenue ROW.	June 2011 – March 2016	Completed
	Phase II: Upgrading 865 linear feet of 60-inch diameter pipe within the Coldwater Canyon Avenue ROW between Moorpark Street and Dickens Street.	November 2021 – May 2023	Design/Environmental Review
City Trunk Line South, Unit 6	Upgrading approximately 1,800 linear feet of 60-inch diameter pipe within the Coldwater Canyon Avenue, Avenida Del Sol, and Oeste Street ROW.		Design/Environmental Review

Source: LADWP 2019

2.2 Project Design

As stated in Section 1.1, Project Overview, and illustrated in Figure 2-1, Project Components, the proposed project would include the replacement of the existing large-diameter, WSP potable water trunk line, as follows:

City Trunk Line South: Unit 5, Phase II

- The installation of 20 feet of 64-inch WSP for the tie-in connection within the Coldwater Canyon ROW, north of Moorpark Street, using the open trench method.
- The installation of 620 linear feet of 60-inch WSP within Coldwater Canyon Avenue starting at Ventura Boulevard and ending at Valleyheart Drive South, using the pipe jacking method.
- The structural relining with CFRP of 175 linear feet of the existing 62-inch riveted steel pipe where Coldwater Canyon Avenue crosses the Los Angeles River.
- The installation of 50 linear feet of 60-inch WSP for the tie-in connections within Coldwater Canyon Avenue at Dickens Street and just south of the bridge, using the open trench method.

City Trunk Line South: Unit 6

- The installation of 60 linear feet of 60-inch WSP for the tie-in connection to the southerly terminus of the City Trunk Line South, Unit 5, Phase I, in Coldwater Canyon Avenue, using the open trench method.
- The removal and replacement of the existing flow control station within Oeste Avenue with 200 linear feet of 60-inch WSP, using the open trench method.
- The structural relining with CFRP of 675 linear feet of 60-inch WSP; 334 linear feet of 51-inch WSP; and, 688 linear feet of 62-inch riveted steel pipe.
- The installation of an approximately 43.5 x 34 x 23-foot, flow control station vault on the LADWP-owned property, located at 3380 Coldwater Canyon Avenue, Studio City.
- Interior improvements within the existing Coldwater Canyon Pump Station (located along Oeste Avenue), consisting of the removal of four existing pump units, installation of four new pump units, replacement of valves within the pump station, and replacement of piping to accommodate the new pumps.

The proposed project would connect the new, large-diameter water trunk line segments to the previously implemented City Trunk Line Unit 5, Phase 1 project, which was completed in March 2016. Implementation of the proposed project would improve capacity, reliability, and flexibility in the water system, and would complete the LADWP's six-phase plan to replace the aging City Trunk Line South, which conveys water from the Los Angeles Reservoir to the Franklin Reservoir.

2.3 Construction

Construction of the proposed project would occur within the public ROW of Coldwater Canyon Avenue, Avenida Del Sol, and Oeste Avenue, as well as on LADWP-owned property located at 3380 Coldwater Canyon Avenue. The proposed project would tie into the existing 54-, 60-, and 64-inch WSP previously installed under Unit 5, Phase I.

During construction, the total estimated amount of excavation would be approximately 7,600 cubic yards, all of which would be exported to Upper Stone Canyon (which is LADWP-owned property) or Sun Valley Landfill, located at 9436 Glenoaks Boulevard. A total of 9,227 square feet of street repaving would occur under the proposed project.

Daily vehicular trips that are expected to occur throughout construction are as follows: maximum of 28 round trips per day for transportation of construction equipment to and from the work areas when necessary; approximately 28 round trips per day for transportation of construction workers to and from the work areas.

Partial block closures would be necessary for installing the new pipeline and its appurtenances; however, no full street closures are anticipated.

The portions of the existing City Trunk Line that would not remain in service would be removed or bulkheaded, filled with grout, and abandoned in place.

Construction Schedule

Construction of the proposed project is anticipated to commence in November 2021 and would end in May 2023. Construction would occur between 7:00 a.m. and 6:00 p.m., Monday through Friday. Nighttime construction work is not anticipated; however, in the event that extended hours, including nighttime hours, are required, additional permits would be required.

Construction Staging

The staging area for equipment and materials would be located within the project's work areas within the public ROW and nearby LADWP properties.

Construction Methods

As described in Section 1.1, Project Overview, and Section 2.2, Project Design, the proposed project would include several construction methods through which the trunk line replacements and improvements would be implemented, namely pipe jacking and open trenching. Additionally, segments of existing pipe that would not be replaced using the pipe jacking and open trenching methods would be reinforced with CFRP. These construction methods and the CFRP lining process are described in detail below.

Pipe Jacking

Pipe jacking is a form of tunneling that is used to reduce disruptions at busy intersections and to extend underneath surface features along the alignment that are not suitable for open trench construction. It would be used to install approximately 620 linear feet of 60-inch WSP within Coldwater Canyon Avenue starting at Ventura Boulevard and ending at Valleyheart Drive South. Pipe jacking activities would last approximately six months and would require 28 construction workers.

The installation of pipelines using pipe jacking avoids the continuous surface disruption that is required for open trench construction. However, some surface disruption would still occur, since "jacking" and "receiving" pits are used and would be excavated along the project alignment. Pipe jacking involves a horizontal auger boring machine that is advanced in a tunnel bore to remove material ahead of or inside the jacking pipe. Powerful hydraulic jacks are used to push a steel jacking pipe from a launch (bore) pit to a receiving pit. As the tunneling machine is driven forward, a jacking pipe is added into the pipe string. The primary phases for pipe jacking are site preparation, excavation, shoring, casing pipe installation, pipe installation, pressure testing, disinfection, and work site restoration.

Site Preparation. Prior to the start of pipe jacking activities, LADWP would coordinate with the Los Angeles Department of Transportation (LADOT) to prepare traffic control plans. The traffic control plans would delineate the traffic lanes around any proposed work areas, as well as address any impacts to turn lane pockets at major intersections that could be affected during project construction. In preparation of excavating the jacking and receiving pits, the existing pavement would be removed using a concrete/asphalt saw cutter or pavement breaker. The pavement would

be removed from the project site and recycled, reused as backfill or pavement base material, or transported to an appropriate recycling or disposal facility.

Excavation and Shoring. A jacking pit and a receiving pit are used for each location that would require jacking, typically one at each end of the pipe segment. The distance between the jacking and receiving pit will be approximately 620 feet, but may be longer or shorter depending on the soil or site conditions.

The jacking pits would generally have interior dimensions of 42 feet long by 17 feet wide, and would be about 50 feet deep. Receiving Pits would have interior dimensions of approximately 25 feet by long by 27 feet wide, and would be about 30 feet deep. The pits would be excavated with backhoes and other excavation equipment. The excavated soil would be hauled to an off-site disposal facility (either to the LADWP-owned Upper Stone Canyon or to Sun Valley Landfill). As excavation occurs, the pits would be shored using the most appropriate shoring system for the site (usually either secant piles or beam and plate shoring).

Pipe installation. Once the pits (17 x 42 feet and 25 x 27 feet) have been excavated and shored, a horizontal hydraulic jack would be placed at the bottom of the jacking pit, and a 76-inch-diameter steel casing would be lowered into the pit and placed on the jack using a crane. A cutting shield would be placed in front of the pipe segment to cut through the soil. As the jack pushes the steel casing and cutting shield into the soil, the soil is removed from within the leading casing with an auger or boring machine, either by hand or on a conveyor. Once a casing segment is pushed into the soil, a new segment is lowered, set in place, and fastened to the casing that has been pushed. Installation of the steel casing is expected to progress at approximately 40 feet per day. Once the 76 inch casing has been installed, a 54-inch diameter carrier pipe would be lowered and placed on the jacks, which push the pipe into the steel casing using casing insulators.

Work Site Restoration. Once the new pipe has been installed along the jacking locations, the shoring system would be dissembled and the pits would be backfilled, compacted, repaved, and restriped.

Construction Equipment.

- 1 Water Truck
- 1 Dump Trailer
- 1 Dump Truck (2-Axle)
- 1 Dump Truck (3-Axle)
- 1 Weld Truck with Trailer
- 1 Excavator CAT 345
- 1 Forklift
- 4 Pick-up Trucks
- 1 Flat Bed Pipe Truck
- 1 Backhoe
- 1 Blower
- 1 Skid Steer
- 1 Wheel Loader
- 1 Low Bed Trailer
- 1 Carry Deck
- 1 Slurry Truck
- 1 Tunnel Boring Machine
- 1 Power Generator
- 1 Electrical System
- 1 Control System
- 1 High Pressure Water Pump

Open Trench Excavation

Open Trench Excavation is a construction method that is typically used to install pipelines and their appurtenant features. The process consists of site preparation, excavation and shoring, pipe installation and backfilling, and work site restoration. Construction typically occurs within roadways and encompasses an approximately 800- to 1,000-foot work area. Open trench excavation would require approximately 12 construction workers throughout the construction period. The following is a description of the phases of construction for open trench excavation:

Site Preparation. Prior to the start of open trench excavation, LADWP would coordinate with LADOT to prepare traffic control plans. The traffic control plans would delineate the traffic lanes around any proposed work areas, as well as address any impacts to turn lane pockets at major intersections that could be affected during project construction. Where practicable, two-way travel along the affected roadways would be maintained throughout construction. Construction would primarily occur along one side of the street and would progress along the alignment with the maximum length of open trench being approximately 500 feet in length at any one time. In preparation, the existing pavement along the proposed alignment would be removed using a concrete/asphalt saw cutter or pavement breaker. The pavement would be removed from the project site and recycled, reused as backfill or pavement base material, or transported to an appropriate recycling or disposal facility.

Excavation and Shoring. A trench would be excavated along the alignment using backhoes, excavators, or other types of excavation equipment. Portions of the trench adjacent to utilities may be manually excavated. The excavated soil would be hauled off site (either to the LADWP-owned Upper Stone Canyon or to Sun Valley Landfill). During this process, approximately 40 cubic yards of excavated soil would be removed per day.

The size of the trench required for this project would be approximately 8 feet wide to accommodate the new 60-inch diameter pipeline installation. The depth of the trench would range from 11 feet to 12 feet below ground surface level. As excavation occurs, the trenches would be shored using the most appropriate shoring system for the site, as determined by the project's contractor, (usually either secant piles or beam and plate shoring) to prevent caving or collapse, per the requirements of the California Department of Industrial Relations, Division of Occupational Safety and Health. Utilities not relocated prior to trenching would be supported as excavation and shoring occurs.

If construction occurs in areas with high groundwater, either a watertight shoring system would be implemented, or, the groundwater would be removed during the excavation of the trenches, usually by pumping it from the ground through dewatering wells that have been drilled along the alignment. The extracted groundwater would first be treated for any contaminants, if present, before being discharged to the storm drain system or to the sewer system under Regional Water Quality Control Board permit requirements.

Pipe Installation and Backfilling. Once the trench has been excavated and shored, pipe segments would be lowered into the trench and covered with bedding material (sand or cement slurry). These segments would be welded at the joints. Pipe installation typically ranges from 40 to 100 feet per day. Once appurtenant structures have been installed and the pipe has been laid, the trench would be backfilled with cement slurry backfill.

Work Site Restoration. Once the new pipe has been installed and the trench has been backfilled, the site would be, compacted, repaved, and restriped.

Construction Equipment.

- 1 Water Truck
- 1 Dump Trailer
- 1 Dump Truck (2-Axle)
- 1 Dump Truck (3-Axle)
- 1 Weld Truck with Trailer
- 1 Excavator CAT 345
- 1 Forklift
- 4 Pick-up Trucks
- 1 Flat Bed Pipe Truck
- 1 Backhoe
- 1 Blower
- 1 Skid Steer
- 1 Wheel Loader
- 1 Low Bed Trailer
- 1 Carry Deck
- 1 Gang Truck
- Multiple Slurry Truck, one at a time

Carbon Fiber Reinforced Polymer Lining

As explained in Section 1.1, Project Overview, the proposed project would include reinforcing approximately 855 linear feet of the existing trunk line with CFRP.

CFRP is an extremely strong composite material made from fiber-reinforced plastic. CFRP is commonly used to reinforce degrading pipelines because (1) it has less impact to the surrounding community, (2) it does not require open trenching, (3) it is generally resistant to corrosion, and (4) it is more cost-effective and time efficient than other methods.

CFRP would be installed by first saturating sheets of glass fiber and carbon fiber with a two part epoxy and then taken inside the pipeline via manhole access where the installer will place the sheets on the pipe and use a squeegee-like tool to adhere them to the pipe and remove any air bubbles. The glass fiber and carbon fiber is left to cure overnight and maintained in a controlled environment (temperature and humidity).

Implementation of the CFRP lining would last approximately six months and would require 25 full-time construction workers.

Construction Equipment

- 1 Pneumatic Abrasive Blast Pot
- 1 Tool Trailer
- 1 FRP Saturator Machine
- 1 Material Storage Trailer
- 1 60 kW In-Line Heater
- 1 18k CFM Dust Collector
- 1 HC 5000 Desiccant Dehumidifier
- 1 375 CFM Air Compressor
- 1 Slurry Truck

Hydrostatic Testing and Pipeline Disinfection

Hydrostatic testing would be conducted periodically throughout construction. The total amount of water required for hydrostatic testing and disinfection would be approximately 845,600 gallons (422,800 gallons for hydrostatic testing and 422,800 gallons for disinfection). Hydrostatic test water would be discharged to the storm drain system in accordance with Los Angeles Regional Water Quality Control Board dewatering permit requirements or to the sewer system per Sewer Capacity Availability Request (SCAR) Permit requirements. Once hydrostatic testing is completed, the new pipelines would be disinfected.

2.4 Operations and Maintenance

Operational activities would be limited to scheduled maintenance and repair. Maintenance activities would be minimal and would be similar to those that occur under existing conditions. Maintenance includes exercising valves and replacing or repairing worn appurtenances to ensure proper performance over the life of the facilities. No permanent workers would be required to operate or maintain the proposed project. Activities associated with long-term operations and maintenance therefore, would be minimal.

2.5 Best Practices

To minimize potential traffic and transportation impacts, the construction of the proposed project would be implemented in accordance with the Standard Specifications for Public Works Construction (Greenbook). Traffic Control Plans would be designed, reviewed and approved by LADOT in coordination with LADWP. Implementation of the Traffic Control Plan would allow acceptable levels of service, traffic safety, and emergency access to the site during construction. Equipment necessary for traffic control includes changeable message signs, delineators, arrow boards, and K-rail.

The new pipeline design would include seismic resiliency analysis for all applicable project components. All phases of the proposed project would be required to conform to safety regulations, including those from the State of California Division of Occupational Safety and Health.

2.6 Approvals Required for the Project

Numerous approvals and/or permits would be required to implement the proposed project. These approvals and permits include, but may not be limited to, the items listed below.

State Permits

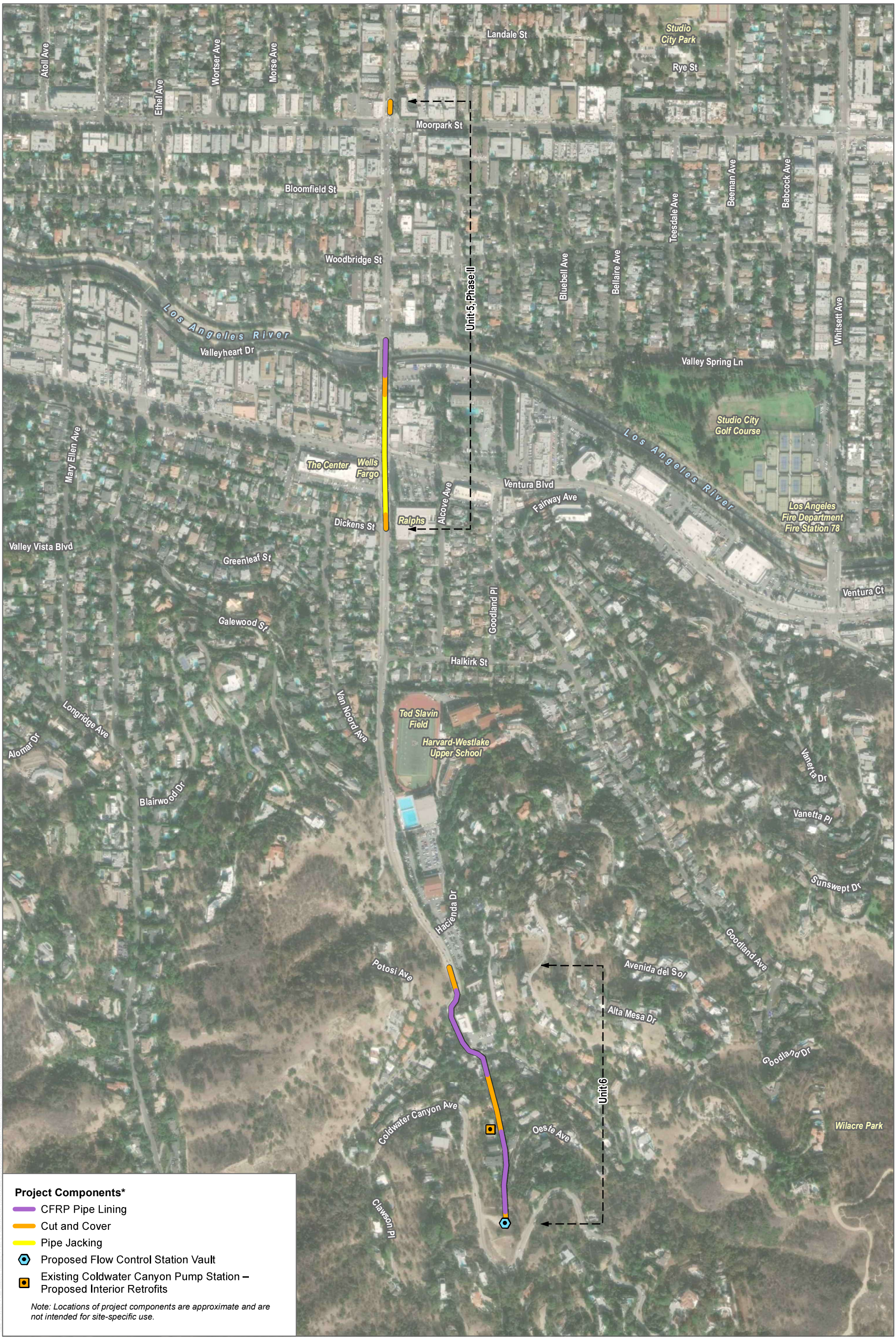
- California Department of Industrial Relations, Division of Occupational Safety and Health, Mining and Tunneling Unit: Tunnel classifications for construction operations covered under Section 8400 through 8469, Tunnel Safety Orders, of the California Code of Regulations.
- State Water Resources Control Board: Notice of Intent to comply with the General Construction Activity National Pollutant Discharge Elimination System (NPDES) Permit (Order No. 2009-0009-DWQ, as amended by Order No. 2010-0014-DWQ, NPDES No. CAS000002).

Local Permits

- Los Angeles Regional Water Quality Control Board:
  - Notice of Intent to comply with the General NPDES Permit for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters (Order No. R4-2013-0095, NPDES No. CAG994004)
  - Notice of Intent to comply with the General NPDES Permit for Discharges of Low Threat Hydrostatic Test Water to Surface Waters (Order No. R4-2009-0068, NPDES No. CAG674001)
  - NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities
- County of Los Angeles Department of Public Works: Encroachment Permit, Excavation Permit, Discharge Permit
- City of Los Angeles: Various ministerial permits from the Bureau of Street Services, Bureau of Engineering, Department of Transportation, and Bureau of Sanitation

2.7 References

LADWP (Los Angeles Department of Water and Power). 2016. City Trunk Line South Project Overview Map. Accessed June 24, 2019. https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-project/a-w-p-infrastructureimprovement/a-w-p-infraimprov-ctls4?_afrLoop=471032598036438&_afrWindowMode=0&_afrWindowId=188gv68uq7_1#%40%3F_afrWindowId%3D188gv68uq7_1%26_afrLoop%3D471032598036438%26_afrWindowMode%3D0%26_adf.ctrl-state%3D8mkil2602_4.



SOURCE: Bing Maps 2019, Open Street Map 2019

Los Angeles Department of Water & Power

0 250 500 Feet

FIGURE 2-1

Project Components

City Trunk Line South Unit 5 Phase II and Unit 6 Project

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3 INITIAL STUDY CHECKLIST

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

1. Project title:

City Trunk Line South Unit 5 Phase II and Unit 6 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:

Christopher Lopez
Los Angeles Department of Water and Power
213.367.3509

4. Project location:

Refer to Section 1.3 of this IS/MND.

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 Districts:

District 2

7. Neighborhood Council Districts:

Studio City Neighborhood Council.

8. General Plan designation:

- Coldwater Canyon Avenue is designated as an "Avenue II" roadway in the City's General Plan Circulation System Map. Avenida Del Sol and Oeste Avenue are designated as "Local/Other" roadways.
- City of Los Angeles General Plan designations for parcels fronting the project alignment: General Commercial; Neighborhood Commercial; Low Residential; Very Low Residential and, Open Space.

9. Zoning:

City of Los Angeles Zoning designations for parcels fronting the project alignment: Commercial (C1.5-1VL; C2-1VL); Restricted Density Multiple Dwelling (RD1.5-1); Single Family Residential (R1-1); Parking (P-1VL); and, Open Space (OS-1XL).

10. Description of project:

Refer to Chapter 2.0 of this IS/MND

11. Surrounding land uses and setting:

Refer to Section 1.4 of this IS/MND

12. Other public agencies whose approval is required:

Refer to Section 2.6 of this IS/MND

13. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Yes. Refer to Section 3.18 of this IS/MND for further details.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process (see Public Resources Code Section 21080.3.2). Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code Section 21082.3(c) contains provisions specific to confidentiality.

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.

☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology and Soils	☐ Greenhouse Gas Emissions	☐ Hazards and Hazardous Materials
☐ Hydrology and Water Quality	☐ Land Use and Planning	☐ Mineral Resources
☐ Noise	☐ Population and Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resources
☐ Utilities and Service Systems	☐ Wildfire	☐ 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.

Nadia J Parker — 4/14/2020

Signature — Date

EVALUATION OF ENVIRONMENTAL IMPACTS

1. 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).
2. 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.
3. 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.
4. "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 (5) below, may be cross-referenced).
5. 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.
6. 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.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion. d

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. 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 significance.

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?	☐	☐	☒	☐
b) Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) 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 points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

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

Less Than Significant Impact. The proposed project would be located in a developed urban area surrounded primarily by commercial and residential development. No scenic vistas exist within the project site or within the vicinity that would be adversely affected by project construction or operation (City of Los Angeles 2001). Furthermore, the proposed project would primarily consist of the replacement of a trunk line, which, upon operation, would be located belowground and, as such, would not have any impact on scenic resources, including scenic vistas. Where the proposed Unit 5, Phase II alignment crosses the Los Angeles River, the interior of the existing pipeline would be lined with CFRP lining, and, as such, would not result in any changes to the visual environment upon operation. Minor appurtenant facilities such as isolation valves, blow-offs, and air/vacuum valves would be visible above ground; however, these structures would be low profile and would not substantially contrast with the surrounding urban built-up environment. The proposed flow control station vault would be the most prominent aboveground portion of the project. The vault would consist of a concrete structure with a footprint of approximately 1,500 square feet. There would also be an electrical cabinet installed next to the vault. The structure would be installed on a generally vacant property owned by LADWP, located at the southern terminus of the proposed alignment (see Figure 2-1). The structure would be positioned on a slope, such that it would have a height of 1.5 feet to 2 feet on three sides of the structure and 6.5 feet on one side (as measured from ground level). Portions of the vault would be visible to travelers along Coldwater Canyon Avenue. However, the vault would be one story in height at its tallest visible portion and would therefore have a relatively low profile. Additionally, the southern side of the structure would be set against a slope, which would partially or fully obstruct views from travelers looking north. Due to the structure's low aboveground profile and its location at the base of a slope, it would not result in a substantial adverse effect to a scenic vista. As such, impacts to scenic vistas would be less than significant.

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. The proposed replacement of the trunk line would be located within existing roadways in a developed area. The nearest officially designated State Scenic Highway is the portion of State Route 2 that extends from just north of La Cañada/Flintridge through the San Gabriel Mountains to San Bernardino County (Caltrans 2017). The portion of State Route 2 that is officially designated as a State Scenic Highway is located approximately 15 miles northeast of the project alignment's northernmost terminus. Due to this distance, the project alignment is not within the viewshed of this State Scenic Highway. Therefore, no impact on scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway would occur as a result of the proposed project.

c) In non-urbanized areas, would the project 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 points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. The northern portion of the proposed project (Unit 5, Phase II) is located in an urbanized area. The southern portion of the proposed project (Unit 6) is located in a partially urbanized area, with adjacent land uses primarily zoned for low-density residential and residential estate uses. The proposed pipeline replacements and improvements would primarily be located underground within public streets or beneath the existing Coldwater Canyon Avenue bridge over the Los Angeles River and would not conflict with zoning regulations or regulations pertaining to scenic quality. During the construction phase, the visual character of the area would be affected temporarily due to the increased presence of construction equipment and activities. However, these impacts would be short-term and temporary in nature. Once installed in the street, the new trunk line segments would not be visible and would have no impact on the visual character or quality of the area. Minor appurtenant facilities such as isolation valves, blow-offs, and air/vacuum valves would be visible above ground; however, these structures would be low profile and would not substantially contrast with the surrounding urban built-up environment. The proposed flow control station vault would be the most prominent aboveground portion of the project. The proposed flow control station vault would be located at the southern end of the proposed project, on generally vacant property owned by LADWP. The flow control station vault would be a concrete structure with a footprint of approximately 1,500 square feet that would be approximately one story in height at its tallest visible portion. The LADWP-owned property is within the Outer Corridor of the Mulholland Drive Scenic Parkway Specific Plan. However, construction of the flow control station vault would adhere to any applicable requirements in the Mulholland Drive Scenic Parkway Specific Plan. Additionally, due to the structure's low profile and the intervening topography and landscaping, the structure is not expected to be visible from Mulholland Drive. Because the LADWP-owned property appears generally vacant under current conditions, the flow control station vault would alter the existing visual character of the property, as viewed from Coldwater Canyon Avenue. However, the new structure would make up a small portion of the total area of the property (approximately 1.6%), and the majority of the property would remain visually unchanged once construction is complete. Additionally, the southern side of the structure would be set against a slope, which would partially or fully obstruct the structure from view. For these reasons, impacts related to visual character/quality would be less than significant.

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 alignment would extend along local roadways surrounded by commercial and residential areas. As such, external and internal night and day illumination is already in place

within the project area and includes street lamps, lit windows, commercial signage, etc. The proposed project would involve the replacement and operation of an existing trunk line and associated repairs, including the interior lining of several pipeline segments with CFRP. Project construction may involve standard traffic control and safety measures, such as barriers, reflective signs, and flashing warnings that would be implemented as necessary. These traffic control and safety measures are common in urban environments and they would not introduce a new source of light or glare that would adversely affect views in the project area. Furthermore, a majority of construction would take place during the day, so traffic control measures would not typically affect nighttime views. Construction activities at intersections may require night work in order to avoid peak commute hours; nighttime construction work would require localized construction lighting. Other situations may also arise that require extended work hours and nighttime lighting, including hydrostatic testing and shutdowns to complete tie-ins. However, night work would be confined to these situations only and would be temporary. Once construction is complete, the trunk line would be primarily underground with the exception of minor appurtenant facilities such as isolation valves, blow-offs, and air/vacuum valves, none of which would include light fixtures. The flow control station vault may be equipped with limited security lighting. Any light would be directed onto the vault and the associated electrical cabinet. As such, nighttime lighting associated with the flow control station vault would be minor and would not be expected to spill over onto adjacent properties. The flow control station vault would be concrete on its exterior; as such, it would not introduce highly reflective materials to the area that could result in daytime glare. For these reasons, the proposed project would not create a new source of substantial light or glare such that day or nighttime views in the area would be substantially affected. Impacts would therefore be less than significant.

References

Caltrans (California Department of Transportation). 2017. *List of Eligible and Officially Designated State Scenic Highways* [excel spreadsheet]. Accessed September 18, 2019. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways.

City of Los Angeles. 2001. City of Los Angeles General Plan, Conservation Element. Accessed August 19, 2019. https://planning.lacity.org/cwd/gnlpln/consvelt.pdf.

3.2 Agriculture and Forestry Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.				
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?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
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))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
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?	☐	☐	☐	☒

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 and surrounding areas are developed and are characterized by features typical of an urban landscape. According to the Department of Conservation's Important Farmland Finder, there are no farmlands designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance within the vicinity of the project alignment (DOC 2019). The proposed project would not convert Farmland to non-agricultural uses, and no impact would occur.

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

No Impact. The project site is not under a Williamson Act contract; therefore, no impacts related to conflicts with Williamson Act contracts would occur (DOC 2016). The proposed project would be located within paved roadways located in a developed area. The properties along the project alignment are zoned for commercial and residential land uses, which preclude agricultural activities. However, the properties along the project alignment are also within an Urban Agriculture Incentive Zone (UAIZ). The UAIZ was established by the City to encourage agriculture in urban areas through reductions in property taxes for qualifying properties used for agricultural purposes for at least 5 years. Property owners can submit a UAIZ application to the City, and if the property qualifies, a UAIZ contract can be issued for tax reductions (City of Los Angeles 2019). Because the proposed project would occur predominantly within paved roadways, it would not affect the use of surrounding private properties for urban agricultural purposes. While project construction could create temporary nuisances at adjacent properties associated with noise, dust, and roadway closures, these nuisances would be temporary and would not affect the long-term use of adjacent properties should the property owner(s) choose to use them for agricultural purposes. As such, the proposed project would not conflict with existing zoning for agricultural use, or a Williamson Act contract. No impacts would occur.

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. As stated above, the proposed project would be located in an urban area, within a roadway that is surrounded by residential, commercial, and some parking and open space land uses. No forest land, timberland, or Timberland Production areas or areas zoned for those purposes are located within or adjacent to the project alignment. Therefore, the proposed project would not conflict with existing zoning for forest land, timberland, or Timberland Production areas, or result in the loss or conversion of forest lands to non-forest uses. No impact to forest land or timberland would occur.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. As characterized above, no forest land is located within the project area or in the vicinity of the project area, as the area is generally developed with commercial, residential, and public facilities uses. No forest land would be converted or otherwise affected by the proposed project, and no impact would occur.

e) 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 described above, no farmland or forest land is located in the project area or within the vicinity of the project alignment, as the area is generally developed with commercial, residential, and public facilities uses. Furthermore, the proposed project would consist of a trunk line improvement project that would not include a residential or commercial component that could induce population growth, resulting in the subsequent conversion of farmland to non-agricultural use or the conversion of forest land to non-forest use. No impact would occur.

References

DOC (California Department of Conservation). 2016. Los Angeles County Williamson Act FY 2015/2016 Map. Accessed August 20, 2019. ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA_15_16_WA.pdf.

DOC. 2019. California Important Farmland Finder Database. Accessed August 20, 2019. https://maps.conservation.ca.gov/DLRP/CIFF/.

City of Los Angeles. 2019. Urban Agriculture Incentive Zone (UAIZ) Program. July 2019. Accessed August 20, 2019. https://planning.lacity.org/odocument/8ad42004-12d8-4338-95d4-d6d41434cc13/FAQ.pdf.

3.3 Air Quality

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

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

Less Than Significant Impact. The project site is located within the South Coast Air Basin (SCAB), which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County, and 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 California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The most recent adopted AQMP is the 2016 AQMP (SCAQMD 2017), which was adopted by the SCAQMD Governing Board in March 2017. 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 GHGs and toxic risk, as well as efficiencies in energy use, transportation, and goods movement (SCAQMD 2017).

The purpose of a consistency finding is to determine if a project is inconsistent with the assumptions and objectives of the regional air quality plans, and, thus, if it would interfere with the region's ability to comply with federal and state air quality standards. The SCAQMD has established criteria for determining consistency with the currently applicable AQMP in Chapter 12, Sections 12.2 and 12.3, in the SCAQMD CEQA Air Quality Handbook. The criteria are as follows (SCAQMD 1993):

- Whether the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the AQMP.
- Whether the project would exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

To address the first criterion regarding the project's potential to result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the AQMP, project-generated criteria air pollutant emissions were estimated and analyzed for significance and are addressed under Section 3.3(b). Detailed results of this analysis are included in Appendix A. As presented in Section 3.3(b), project construction would not generate criteria air pollutant emissions that would exceed the SCAQMD thresholds, and the project is not anticipated to generate operational criteria air pollutant emissions.

The second criterion regarding the project's potential to exceed the assumptions in the AQMP or increments based on the year of project buildout and phase is primarily assessed by determining consistency between the project's land use designations and potential to generate population growth. In general, projects are considered consistent with, and would not conflict with or obstruct implementation of, the AQMP if the growth in socioeconomic factors is consistent with the underlying regional plans used to develop the AQMP (per Consistency Criterion No. 2 of the SCAQMD CEQA Air Quality Handbook). The SCAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) developed by the Southern California Association of Governments (SCAG) for its Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (SCAG 2016), 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.

[1] Information necessary to produce the emission inventory for the SCAB is obtained from the SCAQMD and other governmental agencies, including the California Air Resources Board, California Department of Transportation (Caltrans), and SCAG. Each of these agencies is responsible for collecting data (e.g., industry growth factors, socioeconomic 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 its Travel Demand Model for estimating/projecting vehicle miles traveled and driving speeds. SCAG's socioeconomic and transportation activities projections in their 2016 RTP/SCS are integrated in the 2016 AQMP (SCAQMD 2017).

As discussed in Section 2 of this IS/MND, the project would occur entirely within the existing roadway ROWs. After construction is complete, the pipeline would not be visible and therefore would not change or affect the existing zoning or land use designations in the project area. Accordingly, the project is consistent with the SCAG RTP/SCS forecasts used in the SCAQMD AQMP development.

In summary, based on the considerations presented for the two criteria, impacts relating to the project's potential to conflict with or obstruct implementation of the applicable AQMP 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 Impact. A quantitative analysis was conducted to determine whether proposed construction activities would result in emissions of criteria air pollutants that may cause exceedances of the NAAQS or CAAQS, or contribute to existing nonattainment of ambient air quality standards. Criteria air pollutants include ozone (O_3), nitrogen dioxide (NO_2), carbon monoxide (CO), sulfur dioxide (SO_2), particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM_{10}), particulate matter with an aerodynamic diameter less than or equal to 2.5 microns ($PM_{2.5}$), and lead. Pollutants that are evaluated herein include volatile organic compounds (VOCs) and oxides of nitrogen (NO_x), which are important because they are precursors to O_3, as well as CO, sulfur oxides (SO_x), PM_{10}, and $PM_{2.5}$.

Regarding NAAQS and CAAQS attainment status,[2] the SCAB is designated as a nonattainment area for federal and state O_3 standards and federal and state $PM_{2.5}$ standards (CARB 2017; EPA 2017). The SCAB is designated as a nonattainment area for state PM_{10} standards; however, it is designated as an attainment area for federal PM_{10} standards. The SCAB is designated as an attainment area for federal and state CO standards, federal and state NO_2 standards, and state SO_2 standards. Although 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.[3]

Appendix G of the CEQA Guidelines indicates that, where available, the significance criteria established by the applicable air district may be relied upon to determine whether a project would have a significant impact on air quality. The SCAQMD has established Air Quality Significance Thresholds, as revised in

[2] 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 Environmental Protection Agency and California Air Resources Board, 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. Attainment = meets the standards; attainment/maintenance = achieve the standards after a nonattainment designation; nonattainment = does not meet the standards.

[3] The phase out of leaded gasoline started in 1976. Since gasoline no longer contains lead, the project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

March 2015, which set forth quantitative emissions significance thresholds below which a project would not have a significant impact on ambient air quality under project-level and cumulative conditions (SCAQMD 2019). The quantitative air quality analysis provided herein applies the SCAQMD thresholds to determine the potential for the project to result in a significant impact under CEQA. The SCAQMD mass daily construction thresholds are as follows: 75 pounds per day for VOC, 100 pounds per day for NO_x, 550 pounds per day for CO, 150 pounds per day for SO_x, 150 pounds per day for PM_{10}, and 55 pounds per day for $PM_{2.5}$.

The following discussion quantitatively evaluates project-generated construction impacts and qualitatively evaluates operational impacts that would result from implementation of the proposed project.

Construction Emissions

Proposed construction activities 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, delivery trucks, and worker vehicle trips). Construction emissions can vary substantially from day to day, depending on the level of activity; 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.

The California Emissions Estimator Model (CalEEMod) Version 2016.3.2 was used to estimate emissions for construction of the proposed project. CalEEMod is a statewide computer model developed in cooperation with air districts throughout the state to quantify criteria air pollutant emissions associated with construction activities from a variety of land use projects, such as residential, commercial, and industrial facilities. CalEEMod input parameters, including the land use type used to represent the project and size, construction schedule, and anticipated construction equipment utilization, were based on information provided by LADWP and default model assumptions.

For the purpose of conservatively estimating project emissions, it is assumed that construction of the project would start in April 2021[4] and would last approximately 2 years.

[4] The analysis assumes a construction start date of April 2021, which represents an earlier construction start date than expected (construction is expected to begin in November 2021). A several month reduction in the schedule does not change the analysis or the

The construction phasing schedule and duration is as follows:

- Flow Control Station Vault Installation (April 2021 – June 2022)
- Site Preparation – Cut and Cover (i.e., Open Trench) (November 2022 – February 2023)
- CFRP Installation (November 2022 – April 2023)
- Pipe jacking (November 2022 – May 2023)

The vehicle trip assumptions and construction equipment mix used for estimating the project-generated emissions are shown in Table 3.3-1, Construction Scenario Assumptions.

Table 3.3-1. Construction Scenario Assumptions

Construction Phase	Average Daily Workers Trips	Average Daily Delivery Truck Trips	Total Haul Truck Trips	Equipment	Quantity	Usage Hours
Flow Control Station	50	16	188	Forklifts	2	6
				Cranes	1	4
				Excavators	1	8
				Skid Steer Loaders	1	8
				Tractors/Loaders/Backhoes	1	8
Site Preparation – Cut and Cover	56	12	762	Aerial Lifts	1	8
				Cranes	1	8
				Excavators	1	8
				Forklifts	1	8
				Skid Steer Loaders	1	8
				Tractors/Loaders/Backhoes	2	8
Carbon Fiber Reinforced Polymer Installation	50	0	0	Air Compressors	2	8
				Generator Sets	2	8
				Other Construction Equipment	1	8
Pipe Jacking	56	12	0	Pipe Jacking		

conclusions of this analysis, because the daily construction activities and intensity are anticipated to be the same; as such, maximum daily air emissions would not exceed that which is analyzed and presented herein. Furthermore, assuming the earliest start date for construction represents a worst-case scenario for criteria air pollutant and GHG emissions, because equipment and vehicle emission factors for later years would be slightly less 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.

Table 3.3-1. Construction Scenario Assumptions

Construction Phase	Average Daily Workers Trips	Average Daily Delivery Truck Trips	Total Haul Truck Trips	Equipment	Quantity	Usage Hours
				Excavator	1	3
				Concrete Saws	1	3
				Tractor/Loaders/Backhoes	1	8
				Pumps	1	8
				Pile Driving for Pipe Jacking Pit		
				Crane (Vibratory hammer)	1	8
				Generator Sets	1	8
				Skid Steer Loaders	1	8
				Air compressors	1	8

Notes: See Appendix A for details.

Internal combustion engines used by construction equipment, trucks, and worker vehicles would result in emissions of VOCs, NO_x, CO, PM_{10}, and $PM_{2.5}$. PM_{10} and $PM_{2.5}$. Emissions would also be generated by entrained dust, which results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil. It is anticipated that the project would require the export of approximately 7,600 cubic yards of earthwork material. The project would be required to comply with SCAQMD Rule 403 to control dust emissions during any dust-generating activities. Standard construction practices that would be employed to reduce fugitive dust emissions include watering of the active grading areas twice a day, with additional watering depending on weather conditions. The application of asphalt pavement would also produce VOC emissions; however, the contractor is required to procure asphalt from a supplier in compliance with the requirements of SCAQMD's Rules 1108 (Cutback Asphalt) and/or 1108.1 (Emulsified Asphalt). The project would be required to comply with SCAQMD's Rule 1166 (VOC Emissions from Decontamination of Soil) if impacted soil is encountered. The project would also be required to comply with SCAQMD Rule 1403 to limit asbestos emissions during removal of existing pipelines that, due to the time of their construction, may have been built with asbestos or asbestos containing materials. In the event that less than 100 square feet of asbestos containing materials is removed, and the asbestos containing material has not been damaged or disturbed, the project may be considered exempt from certain requirements of Rule 1403.

Estimated maximum daily construction criteria air pollutant emissions from all on-site and off-site emission sources is provided in Table 3.3-2.

Table 3.3-2. Estimated Maximum Daily Construction Emissions

Year	VOC	NO_x	CO	SO_x	PM_{10}[a]	$PM_{2.5}$[a]
	pounds per day					
2021	2.83	27.02	26.30	0.06	1.99	1.35
2022	5.23	46.35	51.65	0.12	4.37	2.57
2023	4.89	41.04	50.48	0.12	4.18	2.31
Maximum Daily Emissions	**5.89**	**46.35**	**51.65**	**0.12**	**4.37**	**2.57**
SCAQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: SCAQMD 2019.
Notes: VOC = volatile organic compound; NOx = oxides of nitrogen; CO = carbon monoxide; SOx = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District.
See Appendix A for detailed results.
[a] These estimates reflect control of fugitive dust (watering two times daily) required by SCAQMD Rule 403 (SCAQMD 2005).

As shown in Table 3.3-2, daily construction emissions would not exceed the SCAQMD significance thresholds for VOC, NO_x, CO, SO_x, PM_{10}, or $PM_{2.5}$ during project construction.

Estimated maximum annual construction criteria air pollutant emissions from all on-site and off-site emission sources is provided in Table 3.3-3

Table 3.3-3. Estimated Maximum Annual Construction Emissions

Year	VOC	NO_x	CO	SO_x	PM_{10}[a]	$PM_{2.5}$[a]
	Tons per year					
2021	0.15	1.42	1.37	>0.01	0.13	0.07
2022	0.18	1.61	1.81	>0.01	0.16	0.09
2023	0.14	1.03	1.36	>0.01	0.12	0.06
Maximum Annual Emissions	**0.18**	**1.61**	**1.81**	**>0.01**	**0.16**	**0.09**
Federal De Minimus Threshold	*10*	*10*	*100*	*100*	*100*	*70*
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: SCAQMD 2019.
Notes: VOC = volatile organic compound; NOx = oxides of nitrogen; CO = carbon monoxide; SOx = sulfur oxides; PM10 = coarse particulate matter; PM2.5 = fine particulate matter; SCAQMD = South Coast Air Quality Management District.
See Appendix A for detailed results.
[a] These estimates reflect control of fugitive dust (watering two times daily) required by SCAQMD Rule 403 (SCAQMD 2005).

As shown in Table 3.3-3, annual construction emissions would not exceed the Federal De Minimus thresholds for VOC, NO_x, CO, SO_x, PM_{10}, or $PM_{2.5}$ during project construction. Therefore the project is not subject to federal general conformity determination.

Operational Emissions

Once project construction is complete, operational activities associated with the proposed project would be minimal. No routine daily equipment operation or vehicle trips would be required. There would be interior improvements within the existing Coldwater Canyon Pump Station (located along Oeste Avenue), consisting of the removal of four existing pump units, installation of four new pump units, replacement of valves within the pump station, and replacement of piping to accommodate the new pumps. However, the new pumps would be of a lower horsepower and are anticipated to result in lower emissions than the existing infrastructure. Additionally, while periodic maintenance, repair, and inspections would be conducted, these activities would not represent a substantial change in LADWP operations relative to existing conditions and would not require additional vehicle trips or workers. Because the project would result in minimal long-term operational activities, air quality impacts associated with operational air pollutant emissions would be nominal.

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. Based on these considerations, project-level thresholds of significance for criteria pollutants are used in the determination of whether a project's individual emissions would have a cumulatively considerable contribution on air quality. If a project's emissions would exceed the SCAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant (SCAQMD 2003).

As discussed previously, the SCAB has been designated as a federal nonattainment area for O_3 and $PM_{2.5}$ and a state nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. 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. Proposed construction activities of the project would generate VOC and NO_x emissions (which are precursors to O_3) and emissions of PM_{10} and $PM_{2.5}$. However, as indicated in Table 3.3-2, project-generated construction emissions would not exceed the SCAQMD emission-based significance thresholds for VOC, NO_x, PM_{10}, or $PM_{2.5}$.

Cumulative localized impacts would potentially occur if a construction project were to occur concurrently with another off-site project. Construction schedules for potential future projects near the project site are currently unknown; therefore, potential construction impacts associated with two or more simultaneous projects would be considered speculative.[5] However, future projects would be subject to CEQA and would require air quality analysis and, where necessary, mitigation. Criteria air pollutant emissions associated with construction activity

[5] 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). This discussion is nonetheless provided in an effort to show good-faith analysis and comply with CEQA's information disclosure requirements.

of future projects would be reduced through implementation of control measures required by the SCAQMD. Cumulative PM_{10} and $PM_{2.5}$ emissions would also 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 the SCAQMD. Based on the previous considerations, the project would not result in a cumulatively considerable increase in emissions of nonattainment pollutants, and impacts would be less than significant.

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

Less Than Significant Impact. Localized project impacts associated with construction criteria air pollutants emissions are assessed below.

Sensitive Receptors

Sensitive receptors are those individuals more susceptible to the effects of air pollution than the population at large. People most likely to be affected by air pollution include children, the elderly, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993). The closest sensitive receptor land uses are single-family residences located adjacent to the project as it passes through residential neighborhoods.

Localized Significance Thresholds

The SCAQMD recommends a localized significance threshold (LST) analysis to evaluate localized air quality impacts to sensitive receptors in the immediate vicinity of the project site as a result of construction activities. The impacts were analyzed using methods consistent with those in the SCAQMD's Final Localized Significance Threshold Methodology (SCAQMD 2009). The project is located in Source Receptor Area 2 (Northwest Coastal Los Angeles County). The project's pipeline construction activities would occur over a 0.21-acre area; therefore, for the purposes of the LST analysis, emissions thresholds based on a one-acre site were utilized, which is the smallest unit available in the tables. As mentioned previously, the closest sensitive receptors are single-family homes located adjacent to the project as it passes through residential neighborhoods. The shortest receptor distance available in the SCAQMD LST Methodology is 25 meters (82 feet), which is what was conservatively assumed for this analysis.

Project construction activities would result in temporary sources of on-site criteria air pollutant emissions associated with construction equipment exhaust and dust-generating activities. Off-site emissions from trucks and worker vehicle trips are not included in the LST analysis because they occur off site. The maximum daily on-site construction emissions generated during construction of the proposed project is presented in Table 3.3-

4, and compared to the SCAQMD localized significance criteria for Source Receptor Area 1 to determine whether project-generated on-site construction emissions would result in potential LST impacts.

Table 3.3-4. Construction Localized Significance Thresholds Analysis

Year	NO_2	CO	PM_{10}	$PM_{2.5}$
	pounds per day (on site)			
2021	12.07	11.17	0.59	0.54
2022	20.75	22.45	0.99	0.95
2023	18.96	22.32	0.86	0.82
Maximum Daily On Site Emissions	**20.75**	**22.45**	**0.86**	**0.95**
SCAQMD LST Criteria	*103*	*562*	*4*	*3*
Threshold Exceeded?	**No**	**No**	**No**	**No**

Source: SCAQMD 2009.
Notes: NO_2 = nitrogen dioxide; CO = carbon monoxide; PM_{10} = particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District; LST = localized significance threshold.
See Appendix A for detailed results.
Localized significance thresholds are shown for a 1-acre project site corresponding to a distance to a sensitive receptor of 25 meters.

As shown in Table 3.3-4, proposed construction activities would not generate emissions in excess of site-specific LSTs; therefore, localized project construction impacts would be less than significant.

CO Hotspots

Traffic-congested roadways and intersections have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed federal and/or state standards for CO are termed CO "hotspots." CO transport is extremely limited, because CO disperses rapidly with distance from the source. Under certain extreme meteorological conditions, however, CO concentrations near a congested roadway or intersection may reach unhealthy levels, affecting sensitive receptors. Typically, high CO concentrations are associated with severely congested intersections. Projects contributing to adverse traffic impacts may result in the formation of a CO hotspot. Additional analysis of CO hotspot impacts would be conducted if a project would result in a significant impact or contribute to an adverse traffic impact at a signalized intersection that would potentially subject sensitive receptors to CO hotspots. During construction of the project, construction traffic would affect the intersections near the project site. However, the proposed project would be temporary and would not be a source of daily, long-term mobile-source emissions. In addition, due to 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. Finally, as discussed in Section 3.17 of this IS/MND, transportation impacts would be less than significant with mitigation. Furthermore, as discussed in Section 2.4 of this IS/MND, the project would not require new operational staff because the project is a trunk

line replacement project. Therefore, the project would not generate additional traffic volumes and impacts related to CO hot spots would be less than significant.

Toxic Air Contaminants

Toxic air contaminants (TACs) are defined as substances that may cause or contribute to an increase in deaths or in serious illness, or that may pose a present or potential hazard to human health. As discussed under the LST analysis, the nearest sensitive receptors to the proposed project are residences located adjacent to the project as it passes through residential neighborhoods.

Health effects from carcinogenic air toxics are usually described in terms of cancer risk. The SCAQMD recommends an incremental cancer risk threshold of 10 in 1 million. "Incremental cancer risk" is the net increased likelihood that a person continuously exposed to concentrations of TACs resulting from a project over a 9-, 30-, and 70-year exposure period will contract cancer based on the use of standard Office of Environmental Health Hazard Assessment risk-assessment methodology (OEHHA 2015). In addition, some TACs have non-carcinogenic effects. The SCAQMD recommends a Hazard Index of 1 or more for acute (short-term) and chronic (long-term) non-carcinogenic effects.[6] TACs that would potentially be emitted during construction activities associated with the proposed project would be diesel particulate matter.

Diesel particulate matter emissions would be emitted from heavy equipment operations and heavy-duty trucks. Heavy-duty construction equipment is subject to a California Air Resources Board (CARB) Airborne Toxics Control Measure for in-use diesel construction equipment to reduce diesel particulate emissions. As described for the LST analysis, PM_{10} and $PM_{2.5}$ (representative of diesel particulate matter) exposure would be minimal. According to the Office of Environmental Health Hazard Assessment, health risk assessments (which determine the exposure of sensitive receptors to toxic emissions) should be based on a 30-year exposure period for the maximally exposed individual resident; however, such assessments should also be limited to the period/duration of activities associated with the project. The duration of the proposed construction activities would constitute a small percentage of the total 30-year exposure period. The construction period for the proposed project would be approximately two years, after which construction-related TAC emissions would cease. Due to this relatively short period of exposure and minimal particulate emissions on site, TACs generated during construction would not be expected to result in concentrations causing significant health risks. Additionally, due to the linear nature of the proposed project, emissions would not be concentrated in any one

[6] Non-cancer adverse health risks are measured against a hazard index, which is defined as the ratio of the predicted incremental exposure concentrations of the various non-carcinogens from the project to published reference exposure levels that can cause adverse health effects.

work area for the entire construction duration. Proposed project construction would not generally remain in a single location for more than a few weeks.

Following completion of on-site construction activities, the project would not involve routine daily operational activities that would generate TAC emissions. While periodic maintenance, repair, and inspections would be conducted, these activities would not represent a substantial change in LADWP operations relative to existing conditions and would not require additional vehicle trips. Operation of the proposed project would not result in any non-permitted direct emissions (e.g., those from a point source such as diesel generators).

For the reasons described above, the project would not result in substantial TAC exposure to sensitive receptors in the vicinity of the proposed project, and impacts would be less than significant.

Health Impacts of Criteria Air Pollutants

Construction of the proposed project would generate criteria air pollutant emissions; however, the project would not exceed the SCAQMD mass-emission thresholds, as shown in Table 3.3-2.

The SCAB is designated as nonattainment for O_3 for the NAAQS and CAAQS. Thus, existing O_3 levels in the SCAB are at unhealthy levels during certain periods. The health effects associated with O_3 are generally associated with reduced lung function. Because the proposed project would not involve construction activities that would result in O_3 precursor emissions (VOC or NO_x) in excess of the SCAQMD thresholds, the project is not anticipated to substantially contribute to regional O_3 concentrations and the associated health impacts.

In addition to O_3, NO_x emissions contribute to potential exceedances of the NAAQS and CAAQS for NO_2. Exposure to NO_2 and NO_x can irritate the lungs, cause bronchitis and pneumonia, and lower resistance to respiratory infections. Project construction would not exceed the SCAQMD NO_x threshold, and existing ambient NO_2 concentrations are below the NAAQS and CAAQS. Thus, proposed project construction is not expected to exceed the NO_2 standards or contribute to associated health effects.

CO tends to be a localized impact associated with congested intersections. In terms of adverse health effects, CO competes with oxygen, often replacing it in the blood, reducing the blood's ability to transport oxygen to vital organs. The results of excess CO exposure can include dizziness, fatigue, and impairment of central nervous system functions. CO hotspots were discussed previously as a less than significant impact. Thus, the proposed project's CO emissions would not contribute to the health effects associated with this pollutant.

The SCAB is designated as nonattainment for PM_{10} under the CAAQS and nonattainment for $PM_{2.5}$ under the NAAQS and CAAQS. Particulate matter contains microscopic solids or liquid droplets that are so small that they can get deep into the lungs and cause serious health problems. Particulate matter exposure has been linked to a

variety of problems, including premature death in people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, and increased respiratory symptoms such as irritation of the airways, coughing, or difficulty breathing (EPA 2016). As with O_3 and NO_x, the proposed project would not generate emissions of PM_{10} or $PM_{2.5}$ that would exceed the SCAQMD's thresholds. Additionally, the proposed project would be required to comply with SCAQMD Rule 403, which limits the amount of fugitive dust generated during construction. Accordingly, the proposed project's PM_{10} and $PM_{2.5}$ emissions are not expected to cause any increase in related regional health effects for these pollutants.

In summary, the proposed project would not result in a potentially significant contribution to regional concentrations of non-attainment pollutants and would not result in a significant contribution to the adverse health impacts associated with those pollutants. Impacts 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?

Odor Emissions

Less Than Significant Impact. The occurrence and severity of potential odor impacts depend on numerous factors. The nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying, cause distress among the public, and generate citizen complaints. In accordance with SCAQMD Rule 402 (Nuisance), a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

During project construction, exhaust from equipment may produce discernible odors typical of most construction sites. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment and asphalt pavement application. However, such odors would disperse rapidly from the project site and generally occur at magnitudes that would not affect substantial numbers of people. Accordingly, impacts associated with odors during construction 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 (SCAQMD 1993). Operation of the proposed project would not entail any of these potentially odor-causing land uses. Rather, operation would primarily involve passive operation of the proposed

potable water pipeline underground, as well as occasional, routine maintenance activities conducted by LADWP. Therefore, the proposed project would not create any new sources of odor during operation. Impacts would be less than significant.

Asbestos Emissions

Less Than Significant Impact. Construction activities could result in airborne entrainment of asbestos, particularly when structures built prior to 1980 (such as the existing abandoned pipeline within the proposed alignment) would be removed. However, these materials would be removed in accordance with regulatory requirements pursuant to SCAQMD Rule 1403 (Asbestos Emissions), which establishes survey, notification, and work practice requirements to prevent asbestos emissions during construction activities. Therefore, with compliance with all the applicable federal, state, and local regulations, the potential for the proposed project to create a significant impact to the public or environment from emissions of asbestos would be low. Therefore, impacts related to asbestos emissions would be less than significant.

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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 Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
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 Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
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?	☐	☐	☒	☐
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?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

This section is based on a Biological Technical Report prepared by Dudek for the project (see Appendix B), which analyzed the proposed project alignment and staging areas (project site), as well as a 300-foot buffer surrounding the project site. The project site and buffer are called the "action area" for the purposes of the biological resources analysis.

The proposed Unit 5, Phase II alignment portion of the action area is generally surrounded by multi-family residential and small segments of strip commercial and civic (City of Los Angeles Department of Water and Power, Station 46) land uses. This portion of the project traverses the channelized Los Angeles River. The proposed Unit 6 alignment of the action area generally traverses through single-family residential land uses. There is open space located to the east (Wilacre Park) and the west (Coldwater Canyon Open Space) of the residential land.

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. One special-status plant species, southern California black walnut (*Juglans californica*), was observed within the project site or surrounding action area during the site visit conducted in May 2019. Southern California black walnut is considered a sensitive species by the City (2006a). The species is found within the LADWP-owned property located at 3380 Coldwater Canyon Avenue within the proposed Unit 6 alignment. Impacts may occur due to the construction of the proposed flow control station and open trench excavation. Since southern California black walnut is also covered under the City's Protected Tree Ordinance (City of Los Angeles 2006b), direct and indirect impacts to special-status plants are discussed in Section 3.4(e).

As discussed in Appendix B, one special-status bird species, Nuttall's woodpecker (*Picoides nuttallii*), was observed in the action area and another, oak titmouse (*Baeolophus inornatus*), has a moderate potential to occur.

These species are U.S. Fish and Wildlife Service Birds of Conservation Concern (USFWS 2008) and have potential to nest and/or forage within or immediately adjacent to the proposed project footprint within the LADWP-owned property located at 3380 Coldwater Canyon Avenue where the flow control station vault is proposed. If these species were determined to occur on the project site prior to construction, project-related direct impacts would occur particularly if construction results in the loss of active nests of the two species. The loss of active nests of these species would be significant. Project implementation of Mitigation Measure MM-BIO-1 (i.e., seasonal recommendations, pre-construction survey, avoidance buffers, and monitoring) would reduce potential direct impacts to a less-than-significant level.

MM-BIO-1: Nesting Bird Avoidance

Initiation of construction activities (i.e., initial vegetation clearing) should avoid the migratory bird nesting season (February 1 through August 31), to reduce any potential significant impact to birds that may be nesting on the project site. If construction activities must be initiated during the migratory bird-nesting season, an avian nesting survey of the project site and contiguous habitat within 500 feet of all impact areas must be conducted for protected migratory birds and active nests. The avian nesting survey shall be performed by a qualified wildlife biologist within 72 hours prior to the start of 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 species' sensitivity to disturbance (typically 50 feet for common, urban-adapted species, 300 feet for other passerine species, and 500 feet for raptors and special-status species). The nest area shall be avoided until the nest is vacated and the juveniles have fledged. The nest area shall be demarcated in the field with flagging and stakes or construction fencing. A qualified biologist (with the ability to stop work) shall serve as a construction monitor during those periods when construction activities will occur near active nest areas to ensure that no inadvertent impacts on these nests occur.

As described in Appendix B, no other special-status plant or wildlife species were observed within the project site or surrounding action area during the site visit conducted in May 2019. The proposed project occurs within the Van Nuys United States Geological Survey 7.5-minute quadrangle. A California Natural Diversity Database and California Native Plant Society Inventory of Rare and Endangered Plants query was conducted for the Hollywood United States Geological Survey 7.5-minute quadrangle and surrounding eight quadrangles (Burbank, Canoga Park, Oat Mountain, San Fernando, Sunland, Topanga, Beverly Hills, and Hollywood)

(CDFW 2019a; CNPS 2019), and a 1-mile buffer around the project site was queried for U.S. Fish and Wildlife Service occurrence data (USFWS 2019a). The results of these queries are provided in Appendix B. No U.S. Fish and Wildlife Service–designated critical habitat for listed wildlife or plant species exists within 1 mile of the project site (USFWS 2019b). Given the above, and with implementation of MM-BIO-1, the proposed project would have a less than significant impact 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.

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?

Less Than Significant with Mitigation Incorporated. The project site and surrounding action area supports one sensitive vegetation community (coast live oak–southern California walnut woodland association), found within the LADWP-owned property located at 3380 Coldwater Canyon Avenue within the proposed Unit 6 alignment. The understory of the community within the action area has been regularly disturbed due to fuel reduction required for the surrounding residential properties and the practice is expected to continue in perpetuity. Since project impacts would only occur to the tree component of the community (coast live oak [*Quercus agrifolia*] and southern California black walnut), which are also trees protected by the City of Los Angeles's Protected Tree Ordinance (City of Los Angeles 2006b), direct and indirect impacts to sensitive vegetation communities are discussed in Section 3.4(e). As concluded in Section 3.4(e), impacts would be less than significant with mitigation incorporated.

c) Would the project 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?

Less Than Significant Impact. A segment of the proposed project would cross the Los Angeles River, which is within a concrete channel, via the Coldwater Canyon Avenue bridge. The project proposes to reline 175 linear feet of existing 62-inch riveted steel pipe in this section with CFRP. The CFRP lining would be installed from the inside of the pipeline and is not anticipated to result in direct impacts to the Los Angeles River. As such, work within the Los Angeles River is not anticipated as part of this project. However, there is some possibility that this segment of the pipe may need additional reinforcements. This could be achieved by placing a boom outside the river and extending the boom far enough to place a worker under the bridge. If that method of access is not deemed possible during construction, access via the Los Angeles River may be necessary. A boom or scissor lift would be placed in the Los Angeles River for workers to drill holes on the bridge soffit and install steel band and lateral bracing that would add

additional support to the existing pipe. To prevent impacts to the river, the boom or scissor lift would be rubber tired and would be lowered into the channel with a crane. Equipment within the river would be removed at the end of each work day and would not remain in the channel overnight. The methods of using rubber-tired equipment, placing the equipment into the channel with a crane, and removing equipment from the river channel after each work day would ensure that direct impacts to the Los Angeles River would be avoided.

Potential temporary indirect impacts to jurisdictional waters (Los Angeles River) in the action area would primarily result from construction activities and would include potential impacts from the generation of fugitive dust and the introduction of chemical pollutants (including herbicides). Excessive dust can decrease the vigor and productivity of vegetation through effects on light, penetration, photosynthesis, respiration, transpiration, increased penetration of phytotoxic gaseous pollutants, and increased incidence of pests and diseases. Erosion and chemical pollution (releases of fuel, oil, lubricants, paints, release agents, and other construction materials) may affect wetlands/jurisdictional waters. The release of chemical pollutants can reduce the water quality downstream and degrade adjacent habitats. However, during construction, erosion-control measures would be implemented as part of the Storm Water Pollution Prevention Plan (SWPPP) for the project. Prior to the start of construction activities, the Contractor is required to file a Permit Registration Document with the State Water Resources Control Board in order to obtain coverage under the NPDES General Permit for Storm Water Discharges Associated with the Construction and Land Disturbance Activities (Order No 2009-009-DWQ, NPDES No. CAS000002) or the latest approved general permit. This permit is required for earthwork that results in the disturbance of one acre or more of total land area. The required SWPPP would mandate the implementation of best management practices to reduce or eliminate construction-related pollutants in the runoff, including sediment. With implementation of the SWPPP best management practices (BMPs), indirect impacts would be less than significant.

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?

Less Than Significant with Mitigation Incorporated. The LADWP-owned property located at 3380 Coldwater Canyon Avenue is within Habitat Block 16 identified in the Eastern Santa Monica Mountains Habitat Linkage Planning Map (SMMC 2017). This habitat block is one of the connections between Wilacre Park to the east and Coldwater Canyon Open Space and Longridge Canyon Park to the west. Project components proposed in this location would include the flow control station vault and approximately 80 feet of excavation trenching. The LADWP-owned property is 99,750 square feet in size (County of Los Angeles 2009). The 80 feet of trenching would result in a temporary impact on the surface and would not restrict wildlife movement through the area. The proposed flow control station vault is expected to have a footprint of 43.5 feet by 34 feet

(1,500 square feet). Upon operation of the proposed project, the remaining 98,250 square feet (2.26 acres) of the property would still be available for wildlife movement. The loss of approximately 1.5% of the property would result in less than significant impacts to wildlife corridors and habitat linkages.

The remainder of the proposed project alignment would occur within an urban setting, primarily within the ROWs of existing public roadways, and would neither interfere with or remove access to established native resident or migratory wildlife corridors nor impede the use of native wildlife nursery sites. Urban-adapted wildlife species (i.e., coyote, striped skunk, raccoon, opossum) may use the action area for local movement, but these species are primarily nocturnal and limited nighttime work and lighting is expected; project construction is scheduled to occur between 7:00 a.m. and 6:00 p.m. Monday through Friday. Therefore, direct and/or indirect impacts to wildlife corridors and habitat linkages are not anticipated.

The trees and shrubs in the LADWP-owned property located at 3380 Coldwater Canyon Avenue and along Oeste Avenue within the proposed Unit 6 alignment provides nesting habitat for bird species protected under the Migratory Bird Treaty Act (16 USC 703-712) and California Fish and Game Code Sections 3503.5, 3503, and 3513. Trimming, pruning, and/or removal of trees and shrubs may occur as a result of construction of the project and could disrupt breeding activity. There may be a potential for a direct permanent impact to occur to nesting birds (i.e., direct impacts to individuals, active nests, eggs, or young), particularly during the general nesting season of February 1 through August 31. Construction activities that could result in direct impacts to nesting birds include vegetation and tree removal during grading activities. Implementation of MM-BIO-1 would reduce potential direct impacts to a less-than-significant level.

The trees and shrubs throughout the remainder of the project site provide limited nesting habitat for bird species protected under the Migratory Bird Treaty Act (16 USC 703-712) and California Fish and Game Code Sections 3503.5, 3503, and 3513. Given the generally urbanized setting and noise prevalent within the action area, the proposed project activities are not anticipated to result in direct and/or indirect impacts to nesting birds throughout the remainder of the alignment. With implementation of MM-BIO-1, the proposed project would have a less than significant impact.

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 four inches or more in cumulative diameter, as measured at 4.5 feet above the ground level at the base of the tree (City of Los Angeles 2006b). Trees protected under this ordinance include all oak trees

indigenous to California, excluding the scrub oak (*Quercus dumosa*), southern California black walnut, California sycamore (*Platanus racemosa*), and California bay (*Umbellularia californica*).

It is estimated that five southern California black walnut and three coast live oak may need to be removed within the LADWP-owned property located at 3380 Coldwater Canyon Avenue and along Oeste Avenue (Appendix B). This is a potentially significant impact, absent mitigation. Project implementation of MM-BIO-2 (i.e., tree replacement) would reduce potential direct impacts to a less than significant level.

An additional 30 trees (eight southern California black walnut and 22 coast live oak) within the LADWP-owned property and along Oeste Avenue could be indirectly impacted due to project activities within the tree protection zone (canopy drip line plus 5 feet or 15 feet from trunk, whichever is greater), which could cause root damage that results in tree mortality (Appendix B). However, during construction, tree protection measures would be implemented as required by the conditions of the City-issued tree removal permit (City of Los Angeles 2018). A photograph exhibit must be submitted as part of the application package for the tree removal permit that shows protective fencing around the trees that are not expected to be removed by project activities. The application package must also include construction impact guidelines that avoid or minimize impacts to protected trees. With implementation of the tree removal permit conditions, indirect impacts to protected trees would be less than significant.

MM-BIO-2: Tree Replacement

Based on removal of eight protected trees from the project site, a minimum of 32 (20 southern California black walnuts and 12 coast live oak) 15-gallon-size protected trees of like species are required to be planted by the Los Angeles Department of Water and Power (LADWP). The specific location of individual mitigation tree plantings on site shall be addressed in a mitigation planting plan or landscape design plan prepared for the site. It is estimated that all of the required mitigation trees can be accommodated within the LADWP-owned property located at 3380 Coldwater Canyon Avenue. The mitigation requirement and the approved tree replacement mitigation ratio is at the discretion of the City and subject to the final conditions of the City-issued tree removal permit.

All tree plantings will be subject to a five-year monitoring effort by an independent third-party certified arborist. This monitoring effort will consider growth, health, and condition of the subject trees in order to evaluate the proposed project's success. The monitoring effort may result in a recommendation of remedial actions should any of the tree plantings exhibit poor or declining health. In an effort to maintain minimum mitigation tree quantities following the five-year monitoring period, it is recommended that over-planting be done for the required

mitigation trees by 50%, resulting in a mitigation planting of 48, 15-gallon-size protected trees of like species.

With implementation of MM-BIO-2, impacts would be less than significant.

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. Species or habitats covered within any Habitat Conservation Plan, Critical Habitat Designations, Natural Community Conservation Plans, Significant Ecological Areas, or other approved conservation plans have not been identified within the action area (CDFW 2019b). As such, the proposed project would not be located within an area affected by or subject to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, no impact would occur.

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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 §15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Less Than Significant Impact. A segment of the City Trunk Line South pipeline and some of its associated infrastructure are historic-age structures. Additionally, the proposed project would occur adjacent to numerous historic-age structures, including buildings and a California Department of Transportation (Caltrans) bridge. Historic-age structures are those that are built more than 45 years ago and, therefore, have the potential to be considered historical resources pursuant to Section 15064.5 of the CEQA Guidelines. (While some historical resources are also considered archaeological resources, such resources are addressed in Section 3.5(b), as part of the discussion of archaeological resources.)

The cultural resources assessment for the proposed project (contained in this document as Appendix C) includes a description of the historic-age structures that could be affected by the proposed project and an evaluation as to whether the project would cause a substantial adverse change in the significant of a historical resource.

The segment of the City Trunk Line South pipeline and its associated infrastructure from just north of the Coldwater Canyon Avenue/Moorpark Street intersection to the north entrance to the Franklin Tunnel is of historic age. As part of the proposed project, these structures would be demolished and replaced with modern structures that have a similar function. As such, these structure would be directly affected by the proposed project and, therefore, were evaluated for their historical significance in consideration of National Register of Historic Places, California Register of Historical Resources, and City of Los Angeles Historic-Cultural Monument criteria and integrity requirements. Based on the evaluation, these structures were determined to be ineligible for national, state, or local listing as historical resources. Therefore, this segment of the City Trunk Line South and its associated infrastructure are not considered a historical resource under CEQA. As such, removal of these structures as part of the proposed project would not cause a substantial adverse change in the significance of a historical resource.

The Coldwater Canyon Pump Station would undergo interior improvements consisting of retrofitting activities involving replacement of the four existing pump units within the building, replacement of valves within the pump station, and replacement of interior piping to accommodate the new pumps. These activities would occur within the pump station building and would not require any changes to the exterior of the building. The internal pump station equipment must be upgraded in order for the building to continue its historic use and will not result in any exterior changes to the building itself. Therefore, there is no potential to impact historical resources as a result of the pump station improvements.

The proposed project would also occur adjacent to numerous historic-age structures. As such, Appendix C includes an evaluation of the proposed project's potential to cause indirect effects to historical resources. One

of these historic-age structures is Caltrans Bridge Number 53C1138, which is located where Coldwater Canyon Avenue passes over the Los Angeles River. The proposed project would extend below this bridge. While this bridge is a historic-age structure, it was determined to be ineligible for the National Register of Historic Places by Caltrans Professionally Qualified Staff. Additionally, the segment of the City Trunk Line South that runs below the bridge would be subject to CFRP pipe lining, which is considered minimally invasive. Given the finding of ineligibility by Caltrans, and the fact that the proposed project would not directly impact the bridge, no significant effects would occur to this bridge as a result of the proposed project.

Many of the buildings adjacent to the proposed project are over 50 years old and are thus considered historic-age structures. Because all pipeline work would be completed below ground, no permanent visual impacts would occur to the adjacent buildings. However, proposed project construction activities would result in groundborne vibrations in close proximity to these historic-age buildings. As such, Appendix C includes an assessment of indirect impacts from groundborne vibration for the proposed construction methods and associated equipment. The assessment showed that the proposed project would not adversely affect any adjacent buildings or structures. As such, the proposed project would not indirectly affect any adjacent historic-age structures. For these reason, impacts would be less than significant.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less Than Significant with Mitigation Incorporated. No newly or previously recorded archaeological resources were identified within the project alignment during the California Historical Resources Information System records search, Native American Heritage Commission Sacred Lands File search, or pedestrian survey (see Appendix C for details on the records searches and Native American coordination). With exception to the open space area along the southern terminus of the proposed Unit 6 alignment on LADWP-owned property located at 3380 Coldwater Canyon Avenue, excavation activities associated with the proposed project would be limited to previously disturbed portions of the public right-of-way. However, it is possible that previously undiscovered intact archaeological deposits are present at subsurface levels and could be uncovered during ground-disturbing activities. As such, mitigation measure MM-CUL-1 is provided to address inadvertent discoveries during construction. Impacts related to archaeological resources would be less than significant with mitigation incorporated.

MM-CUL-1: Inadvertent Discovery of Archaeological Resources

In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the proposed 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 under the California Environmental Quality Act (14 CCR 15064.5(f); California PRC Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, data recovery, and/or monitoring may be warranted.

c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant with Mitigation Incorporated. No prehistoric or historic burials were identified within the project area as a result of the records search. However, the possibility of encountering human remains within the proposed project area exists. The discovery of human remains would require handling in accordance with California Public Resources Code 5097.98, which states that in the event that human remains are discovered during construction, construction activity shall be halted and the area shall be protected until consultation and treatment can occur as prescribed by law. In the unexpected event that human remains are unearthed during construction activities, impacts would be potentially significant. However, upon implementation of MM-CUL-2, impacts would be reduced to below a level of significance. Impacts to human remains are therefore less than significant with mitigation incorporated.

MM-CUL-2: Inadvertent Discovery of Human Remains

In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the County Coroner shall be immediately notified of the discovery and a qualified archaeologist will be contacted. No further excavation or disturbance of the project site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within two working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the Native American Heritage Commission in Sacramento within 24 hours. In accordance with California Public Resources Code, Section 5097.98, the Native American Heritage Commission must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant shall complete their inspection within 48 hours of being granted access to the site. The most likely descendant would then determine, in consultation with the property owner, the disposition of the human remains. Upon discovery, a qualified archaeologist will be retained to ensure

proper implementation of the treatment agreed upon by the most likely descendant and property owner.

References

None.

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?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

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 are 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 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 serves the City, including the proposed project area. Southern California Gas 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), Southern California Gas 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 Energy Information Association, 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 Energy Use

Electricity

Temporary electric power for as-necessary lighting and electronic equipment would be provided by the contractor through fuel powered generators. 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, proposed 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 proposed project. Fuels used for construction would primarily consist of diesel and gasoline, which are discussed under the subsection "Petroleum." Any natural gas that may be consumed as a result of proposed project construction would be

negligible and used only temporarily and, as such, would not have an adverse effect; therefore, proposed project construction would not result in wasteful, inefficient, or unnecessary consumption of natural gas. Impacts would be less than significant.

Petroleum

Petroleum would be consumed throughout construction. Fuel consumed by construction equipment would be the primary energy resource expended over the course of construction. Transportation of construction materials and construction workers would also result in petroleum consumption. Heavy-duty construction equipment, vendor trucks, and haul trucks would use diesel fuel. Construction workers would likely travel to and from the project area in gasoline-powered vehicles. The two-year construction period is expected to begin in 2021 and end in 2023. Once construction activities cease, petroleum use from off-road equipment and transportation vehicles would end. Because of the short-term nature of construction and relevantly small scale of the project, impacts would be less than significant.

Operational Energy Use

As discussed in Section 2, maintenance activities for the trunk line would be similar in scope and scale to the maintenance activities that are currently conducted for the existing pipelines that would be connected and other pipelines throughout LADWP's service area under existing conditions. Once complete, the proposed project would require minimal amounts of power to operate the flow control station vault located on the LADWP property at 3380 Coldwater Canyon Boulevard; however, the electric power required would not be notable. Additionally, the new pumps proposed for installation within the Coldwater Canyon Pump Station would require power as well; however, the power required is anticipated be lower than that required for the existing pumps due to improvements in equipment efficiency. Anticipated maintenance activities would be minimal and similar to maintenance activities currently occurring for the existing pipelines in the project area; therefore, the project's energy demand for operation and maintenance would be similar when compared to existing conditions. In addition, energy used for maintenance purposes would decrease over time, as worker vehicles and equipment become increasingly efficient, in accordance with the energy efficiency and GHG reduction standards. As such, energy use for operation and maintenance purposes would not substantially change under the proposed project, and no impacts would occur as a result of project operations and maintenance.

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

Less Than Significant Impact. The proposed project would follow applicable energy standards and regulations during the construction phases. In addition, the proposed project would be built and operated in accordance with all existing, applicable regulations at the time of construction. As such, impacts related

to the project's potential to conflict with plans for renewable energy and energy efficiency would be less than significant.

References

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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	☐	☐	☐	☒

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

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. Surface fault rupture occurs when movement on a fault deep within the earth breaks through the surface. Ground surface fault rupture may also accompany fault creep of natural or man-induced subsidence. Fault rupture can cause structural damage and safety risks on and near the rupture. Fault rupture along or near a pipeline alignment would have the potential to compromise the structural integrity of the pipeline, resulting in the potential for pipeline breakage and associated safety hazards for people in the area (e.g., flooding and/or temporary service outages).

The "Alquist-Priolo Earthquake Fault Zoning Act" is a state law that regulates development projects near active faults to mitigate the hazard of surface fault rupture. The proposed project alignment is not located within an Alquist-Priolo fault zone, meaning that the State Geologist has not mapped any surface traces of active faults along the alignment. The closest active fault is located approximately one mile to the northeast of the project site, at the closest point. According to the California Geological Survey (CGS), this fault is unnamed and considered Holocene-active, however it is not considered an Alquist-Priolo earthquake fault zone (CGS 1998, 2010). As such, the potential for fault rupture to affect the project is considered low. Furthermore, project construction and operation would not increase or exacerbate the potential for fault rupture to occur. Therefore, the project would not directly or indirectly cause potential adverse effects involving rupture of a known earthquake fault and no impacts would occur.

ii) Strong seismic ground shaking?

Less Than Significant Impact. The project area is located within southern California, a seismically active region that is known for its many active faults and historic seismicity. As described above, a Holocene-active fault is located approximately one mile northeast of the project alignment. While this fault is not within an Alquist-Priolo fault zone, it could still cause strong ground shaking. Ground shaking from this fault and others throughout the region resulting from an earthquake could impact the proposed project. The degree of ground shaking that is felt at a given site depends on the distance from the earthquake source (epicenter), the magnitude of the earthquake, the type of subsurface material on which the site is situated, and topography. Ground shaking can result in severe damage to pipelines if subjected to strong horizontal movement that exceeds the design standards. Ground shaking could result in pipeline

breakage and associated flooding hazards. However, the proposed pipeline and appurtenant structures would be constructed in compliance with earthquake-resistant standards, as required by the California Building Code. Furthermore, although the proposed project could be subject to severe seismic shaking, the project would not increase or exacerbate the potential for earthquakes to occur. In the event of pipeline breakage during ground shaking, flooding may occur in the project area. However, safety valves throughout the water distribution system may be shut off (as deemed necessary by LADWP in response to a loss of pressure), which would isolate the break. The volume of potable water released in such an event would therefore be limited to the amount of water contained in the section of pipeline between the shut-off valves, which would not be expected to yield enough water to pose a significant risk to life or property. Additionally, adherence to seismic standards and geotechnical engineering recommendations would reduce the potential for pipe breakage during a seismic event to the extent practicable. In addition, project construction and operation would not increase or exacerbate the potential for strong seismic ground shaking to occur. Therefore, the proposed project would not directly or indirectly cause potential adverse effects involving seismically induced ground shaking and impacts would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Seismic-related ground failure can include hazards such as liquefaction, earthquake-induced landslides, and seismically induced settlement (landslides are addressed below in Section 3.7(a)(iv)). According to the CGS with the exception of the southern approximate 800 feet of the project alignment, the project would be located within a liquefaction hazard zone (CGS 2010). In the event of liquefaction or other types of seismic-related ground failure along or near the project alignment, the structural integrity of the pipeline and appurtenant structures could be compromised, posing a potential risk to the pipeline and causing potential safety hazards for people in the area in the event of pipeline breakage (e.g., flooding and/or temporary service outages). However, the proposed trunk line segments and appurtenant structures would be constructed in compliance with earthquake-resistant standards as required by the California Building Code. With appropriate design precautions, the potential for liquefaction, seismically induced settlement, or other seismic-related ground failure to adversely affect the new pipeline would be minimal. Furthermore, although portions of the project alignment could be subject to seismic-related ground failure, the project would not increase or exacerbate the potential for seismic-related ground failure to occur. In the event of pipeline breakage during seismic-related ground failure, flooding may occur in the project area. However, safety valves throughout the water distribution system may be shut off (as deemed necessary by LADWP in response to a loss of pressure), which would isolate the break. The volume of potable water released in such an event would therefore be limited to the amount of water contained in the section of pipeline between the shut-off valves, which would not be expected to yield enough water to pose a significant risk to life or property. Additionally, adherence to seismic standards and

geotechnical engineering recommendations would reduce the potential for pipe breakage during a seismic event to the extent practicable. Impacts related to liquefaction and other types of seismic-related ground failure would therefore be less than significant.

iv) Landslides?

No Impact. The project site topography slopes north toward the Los Angeles River, located at the northern terminus of the project alignment. The topography is mostly gently sloping along Coldwater Canyon Avenue; however, the upper approximate 800 feet of the alignment is moderately sloping, in the upper part of the canyon. Much of the southern half of the project, south of Van Noord Avenue, abuts steep, east-facing hillsides that may be prone to seismically induced landslides (CGS 1998, 2015). However, project construction in this area would occur within the paved ROW of Coldwater Canyon Avenue, Oeste Avenue and Avenida Del Sol, and within the interior of the Coldwater Canyon Pump Station, and would not encroach upon or undermine the adjacent hillsides. As such, excavations associated with open trenching and pipe jacking (i.e., jacking pit and a receiving pit) and interior improvements to the Coldwater Canyon Pump Station would not likely increase or exacerbate the potential for landslides to occur. Therefore, the project would not directly or indirectly cause potential adverse effects involving landslides and no impacts would occur.

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

Less Than Significant Impact. The proposed trunk line replacement, including the pipeline and related appurtenant structures, would be located on previously developed or disturbed areas, consisting primarily of paved roadways. Related appurtenant structures would be constructed above ground in unpaved areas. Construction activities including open trenching, pipe jacking, and construction in unpaved areas would produce exposed soils that could be susceptible to erosion as a result of rain, windy conditions, and/or construction vehicles traveling over the exposed soils. However, LADWP or its construction contractor would be required to implement a SWPPP, in compliance with the NPDES requirements for stormwater discharges at construction sites. SWPPPs are required to include erosion control measures, such as covering exposed soil stockpiles, lining the perimeter of construction areas with sediment barriers, and protecting storm drain inlets. These measures would control and reduce erosion and loss of topsoil to a less than significant level. Once construction is complete, the proposed pipeline would be located underground, with the exception of small aboveground appurtenant structures and the proposed flow control station located on the LADWP property at 3380 Coldwater Canyon Avenue, and additional operational impacts related to soil erosion or loss of topsoil would not occur. The proposed relining of existing pipe along Coldwater Canyon above the Los Angeles River would occur at an existing bridge and would not result in the loss of topsoil. Therefore, impacts related to soil erosion or the 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. As previously discussed, much of the project would be located within a zone of potential liquefaction. The project alignment is located primarily on Holocene alluvium, consisting of unconsolidated gravel, sand, silt, and clay. However, the southern portion of the alignment, in the steeper portion of the canyon, is underlain by upper Miocene Modelo Formation bedrock, which consists of silty shale or soft earthy siltstone and interbedded fine- to coarse-grained sandstone (USGS 1996). Portions of the alignment are also likely underlain by artificial fill deposits, resulting from construction of the roadway. Unconsolidated portions of the underlying soils may not be adequate for supporting the proposed pipeline and may be subject to collapse. In the event that soils are inadequate for supporting the proposed pipeline, the structural integrity of the pipeline could become compromised, which could result in damage to the pipeline and associated safety hazards in the immediate area (e.g., flooding and/or temporary service outages).

In addition, localized shallow groundwater may be present along the project alignment, which could result in collapse of excavation sidewalls, as well as uplift, hydrostatic loads, and other geotechnical hazards including swelling, consolidation, erosion, etc. These hazards could compromise the structural integrity of the pipeline.

However, the proposed pipeline and appurtenant structures would be constructed in compliance with geotechnical engineering standards as required by the California Building Code. In areas of proposed trenching and jacking/receiving pits, the excavations would be shored using the most appropriate shoring system for the site, as determined by the project contractor (usually either hydraulic shoring or beam and plate shoring), to prevent caving or collapse, per the requirements of the Division of Occupational Safety and Health.

If construction occurs in areas with high groundwater, either a watertight shoring system would be implemented or the groundwater would be removed during the excavation of the trenches, usually by pumping it from the ground through dewatering wells that have been drilled along the alignment. In areas of trenching, once the trench has been excavated and shored, pipe segments would be lowered into the trench and covered with bedding material (sand or cement slurry). Once appurtenant structures have been installed and the pipe has been laid, the trench would be backfilled with cement slurry backfill, thus stabilizing the pipe and overlying roadway.

Therefore, construction of the proposed project would not cause local geologic units or soils to become unstable and is not anticipated to result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. As such, impacts 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. Expansive soils are clay-based and tend to increase in volume due to water absorption and decrease in water volume due to drying. The project site is underlain by alluvial gravel, sand, silt, and clay, as well as interbedded shale and sandstone bedrock of the Modelo Formation (USGS 1996). As such, soils underlying the project contain clay, indicating that some soils may be expansive. Expansive soils can result in structural damage, particularly if wetting and drying does not occur uniformly throughout the soil. Soil expansion or shrinkage in the soils surrounding the proposed pipeline could compromise the structural integrity of the pipeline. While the proposed pipeline could potentially be exposed to soil expansion, the trenches where the pipeline is installed would be backfilled with material (such as sand and cement slurry) that would be designed to offset any expansive soils present in the area. The proposed pipeline and appurtenant structures would be constructed in compliance with geotechnical engineering standards as required by the California Building Code (Section 1803.5.3, Expansive Soil), which supersedes the Uniform Building Code. Furthermore, although the project could be subject to soil expansion hazards, project construction and operation would not increase or exacerbate the potential for soils to expand or contract. As a result, impacts would 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. No septic tanks or alternative wastewater disposal systems are proposed under the project. Therefore, no impact associated with the use of such systems would occur.

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

Less Than Significant with Mitigation Incorporated. The proposed project would be located within the Transverse Ranges geomorphic province (Norris and Webb 1990; CGS 2002). This geomorphic province extends from Point Conception in the west to the San Bernardino Mountains in the east. The province also includes the San Gabriel, Santa Monica, and Santa Ynez Mountains and the offshore San Miguel, Santa Rosa, and Santa Cruz Islands. (Norris and Webb 1990; California Geological Survey 2002; Morton and Miller 2006; Fuller et al. 2015). This geomorphic province structure is east-west trending and is oblique to the normal northwest trend of coastal California.

More specifically, the proposed project would be located within the eastern Northwestern Block of the Los Angeles Basin, which includes portions of the San Fernando Valley and Verdugo and Santa Monica Mountains (Yerkes et al. 1965). The Northwestern Block is underlain by Jurassic basement rocks, which are in turn overlain

by Late Cretaceous to Pleistocene marine sedimentary rocks that in some areas are capped by Pleistocene to recent terrestrial alluvial sediments.

According to surficial geological mapping at a scale of 1:24,000, the Unit 5 segment of the proposed project alignment is underlain by Holocene (< 12,000 years ago) alluvium (map units Qay1 and Qay2), and the Unit 6 segment of the proposed project alignment is underlain by Holocene alluvium in the lower elevations and the late Miocene (approximately 12 million to 5.3 million years ago) Modelo Formation (map units Tm, Tmd, and Tmss) in the higher elevations (USGS 1996).

Past excavation and trenching activities in the area surrounding the proposed project area have encountered paleontological resources in bedrock. A paleontological records search was requested from the Natural History Museum of Los Angeles County (LACM) on September 5, 2019, and the results were received on September 11, 2019. According to the LACM, younger Quaternary alluvium underlies the northern Unit 5 segment and the majority of the southern portion of Unit 6 segment of the proposed project. However, older sedimentary deposits may underlie the younger deposits in this area (McLeod 2019). While no paleontological localities are documented within the proposed project area, the LACM reported numerous fossil localities within the area, including several within the 1-mile buffer, west of the proposed project site. The nearest locality (locality number LACM 6970) is located due east of Unit 5 at depths of approximately 60 to 80 feet below grade. The locality was discovered during excavation for the Metrorail Redline Universal City Tunnel and yielded Pleistocene age megafaunal reminas, including camel (*Camelops hesternus*), bison (*Bison antiquus*) and ground sloth (*Glossotherium harlani*) (McLeod 2019). Localities LACM 3263, 3822, and 6208, all located west-northwest of the project area and east of the Sepulveda Dam Recreation Area, yielded Pleistocene age fossils. Locality LACM 3822, near the intersection of Kester Avenue and Sepulveda Boulevard and north of Oxnard Street, yielded fossilized peccary (*Platygonus*), camel (*Camelops*), and bison (*Bison*) between 75 and 100 feet below the ground surface. Another fossil locality, LACM 6208, located along Kester Avenue near Burbank Boulevard, produced fossil specimens of bison (*Bison*) at 20 feet below the ground surface. An additional locality to the south, LACM 3263, located near the intersection of Kester Avenue and Otsego Street, yielded fossil specimens of horse (*Equus*) at 14 feet below the ground surface.

The closest locality within the Modelo Formation is LACM 1230, located north-northeast of the Unit 6 segment of the project, just south of Harvard School, and produced a fossil specimen of dolphin (*Pithanodelphis nasalis*) which has been documented in the published literature (McLeod 2019; Barnes 1977, 1985). East of the southern portion of the Unit 5 segment, on the south side of Ventura Boulevard, west of Whitsett Avenue, locality LACM 1229 within the Modelo Formation yielded marine fish (scad, *Decapterus*; deep sea smelt, Bathylagidae; sabretooth salmon, *Oncorhyncus rastrosus*; cod, *Eclipes*; herring, *Xyne grex*) as well as avian (bird) remains. The bird specimen (booby, or *Sula pohli*) is documented in the scientific literature (Howard 1958).

No paleontological resources were identified within the proposed project alignment as a result of the institutional records search and desktop geological review; however, numerous fossil localities from Pleistocene age alluvium, late Miocene age Modelo Formation have been documented nearby. The project site is not anticipated to be underlain by unique geological features. While the proposed project area has been heavily disturbed by development over the years, intact paleontological resources may be present. Given the proximity of past fossil discoveries in the surrounding area and the potential for the proposed project to result in impacts to the underlying Pleistocene alluvium or the Modelo Formation, the proposed project area is highly sensitive for supporting paleontological resources. In the event that intact paleontological resources are present within the proposed project alignment, ground-disturbing activities associated with construction of the proposed project have the potential to destroy a unique paleontological resource or site. Without mitigation, the potential damage to paleontological resources during construction would be a potentially significant impact. However, upon implementation of MM-GEO-1, construction impacts would be reduced to below a level of significance. Construction impacts of the proposed project are therefore considered less than significant with mitigation incorporated. No impacts to paleontological resources would occur during operation, since the proposed project would operate passively, generally below ground and without additional ground disturbing activities.

MM-GEO-1: Paleontological Monitoring Program

Prior to commencement of any grading activity for the project, the Los Angeles Department of Water and Power (LADWP) shall retain a qualified paleontologist per the Society of Vertebrate Paleontology (2010) guidelines. The paleontologist shall prepare a Paleontological Resources Impact Mitigation Program for the proposed project. Following the guidelines of the Society of Vertebrate Paleontology (2010), the Paleontological Resources Impact Mitigation Program shall outline requirements for preconstruction meeting attendance and worker environmental awareness training, where monitoring is required within the project area based on construction plans and/or geotechnical reports, procedures for adequate paleontological monitoring and discoveries treatment, and paleontological methods (including sediment sampling for microvertebrate fossils), reporting, and collections management**.** The qualified paleontologist shall attend the preconstruction meeting and be on site (or a qualified paleontological monitor per the SVP [2010] guidelines) during all rough grading and other significant ground-disturbing activities in previously undisturbed Miocene marine (Modelo Formation and Monterey Formation) deposits. These deposits may be encountered at any depth below any fill materials (i.e., road base). In addition, the qualified paleontologist or paleontological monitor shall monitor below a depth of 5 feet below the ground surface in areas underlain by Quaternary alluvium. The specific monitoring locations will be detailed in the Paleontological Resources Impact Mitigation Program. In the event that paleontological

resources (e.g., fossils) are unearthed during ground-disturbing activities, the qualified paleontologist will temporarily halt and/or divert the activity to allow recovery of paleontological resources. Once documentation and collection of the find is completed, the monitor will allow work to recommence in the area of the find. Per the Society of Vertebrate Paleontology (2010) guidelines, if 50% of excavations in a single geological unit has occurred with no fossil recovery, reduction or termination of paleontological monitoring can be implemented at the qualified paleontologist's discretion.

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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?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact. Climate change refers to any significant change in measures of climate, such as temperature, precipitation, or wind patterns, lasting for an extended period of time (decades or longer). The Earth's temperature depends on the balance between energy entering and leaving the planet's system, and many factors (natural and human) can cause changes in Earth's energy balance. The greenhouse effect is the trapping and build-up of heat in the atmosphere (troposphere) near the Earth's surface. The greenhouse effect is a natural process that contributes to regulating the Earth's temperature, and it creates a

livable environment on Earth. Human activities that emit additional GHGs to the atmosphere increase the amount of infrared radiation that gets absorbed before escaping into space, thus enhancing the greenhouse effect and causing the Earth's surface temperature to rise. Global climate change is a cumulative impact; a project contributes to this impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. Thus, GHG impacts are recognized exclusively as cumulative impacts (CAPCOA 2008).

A GHG is any gas that absorbs infrared radiation in the atmosphere; in other words, GHGs trap heat in the atmosphere. As defined in California Health and Safety Code Section 38505(g) for purposes of administering many of the state's primary GHG emissions reduction programs, GHGs include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3) (see also 14 CCR 15364.5). The three GHGs evaluated herein are CO_2, CH_4, and N_2O. Emissions of hydrofluorocarbons, perfluorocarbons, SF_6, and NF_3 are generally associated with industrial activities including the manufacturing of electrical components, heavy-duty air conditioning units, and insulation of electrical transmission equipment (substations, power lines, and switch gears.). Therefore, emissions of these GHGs were not evaluated or estimated in this analysis because the project would not include these activities or components and would not generate hydrofluorocarbons, perfluorocarbons, SF_6, and NF_3 in measurable quantities.

Gases in the atmosphere can contribute to climate change both directly and indirectly.[7] The Intergovernmental Panel on Climate Change developed the global warming potential (GWP) concept to compare the ability of each GHG to trap heat in the atmosphere relative to other gases. The reference gas used is CO_2; therefore, GWP-weighted emissions are measured in metric tons (MT) of CO_2 equivalent (CO_2e). Consistent with CalEEMod Version 2016.3.2, this GHG emissions analysis assumed the GWP for CH_4 is 25 (emissions of 1 MT of CH_4 are equivalent to emissions of 25 MT of CO_2), and the GWP for N_2O is 298, based on the Intergovernmental Panel on Climate Change Fourth Assessment Report (IPCC 2007).

[7] Direct effects occur when the gas itself absorbs radiation. Indirect radiative forcing occurs when chemical transformations of the substance produce other GHGs, when a gas influences the atmospheric lifetimes of other gases, and/or when a gas affects atmospheric processes that alter the radiative balance of the Earth (e.g., affect cloud formation or albedo) (EPA 2017).

As discussed in Section 3.3 of this IS/MND, the project is located within the jurisdictional boundaries of the SCAQMD. In October 2008, the SCAQMD proposed recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of residential and commercial development projects as presented in its 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 CO_2e 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 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 CO_2e 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 CO_2e per year), commercial projects (1,400 MT CO_2e per year), and mixed-use projects (3,000 MT CO_2e per year). Under option 2, a single numerical screening threshold of 3,000 MT CO_2e 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 CO_2e per-service population for

project-level analyses and 6.6 MT CO_2e 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.

Section 15064.7(c) of the CEQA Guidelines specifies that "[w]hen adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence." The CEQA Guidelines do not prescribe specific methodologies for performing an assessment, establish specific thresholds of significance, or mandate specific mitigation measures. Rather, the CEQA Guidelines emphasize the lead agency's discretion to determine the appropriate methodologies and thresholds of significance that are consistent with the manner in which other impact areas are handled in CEQA (CNRA 2009).

To determine the project's potential to generate GHG emissions that would have a significant impact on the environment, the project's GHG emissions were compared to the non-industrial land project quantitative threshold of 3,000 MT CO_2e per year. Because the project does not include operational sources of emissions, and because the project does not conform to the standard land use types, the 3,000 MT CO_2e per year threshold, which was identified under Tier 3 Option 1, was applied herein. Per the SCAQMD guidance, construction emissions should be amortized over the operational life of the project (SCAQMD 2008). The life of the pipeline is anticipated to be 100 years, and the valves are anticipated to have an operational life of 70 years. As such, a project lifetime of 70 years was conservatively assumed. This impact analysis, therefore, compares amortized construction emissions to the proposed SCAQMD threshold of 3,000 MT CO_2e per year.

Construction Emissions

Construction of the proposed project would result in GHG emissions primarily associated with the use of off-road construction equipment, on-road trucks, and worker vehicles. A depiction of expected construction schedules (including information regarding phasing, equipment used during each phase, truck trips, and worker vehicle trips) assumed for the purposes of emissions estimation is provided in Table 3.8-1 and in Appendix A. On-site sources of GHG emissions include off-road equipment; off-site sources include trucks and worker vehicles. Table 3.8-1 presents construction GHG emissions for the project from on-site and off-site emissions sources.

Table 3.8-1. Estimated Annual Construction GHG Emissions

Year	CO_2	CH_4	N_2O	CO_2e
	Metric Tons per Year			
2021	309.34	0.07	0.00	311.21
2022	409.38	0.09	0.00	411.52
2023	294.41	0.05	0.00	295.63
Total	**1,013.13**	**0.21**	**0.00**	**1,018.36**
			Amortized Construction Emissions	**14.55**

Source: See Appendix A for complete results.
Notes: GHG = greenhouse gas; CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent.

As shown in Table 3.8-1, the estimated total GHG emissions in 2021, 2022, and 2023 would be approximately 311 MT CO_2e, 412 MT CO_2e, and 296 MT CO_2e, respectively. Amortized over 70 years, construction GHG emissions would be approximately 15 MT CO_2e per year. In addition, as with project-generated construction criteria air pollutant emissions, GHG emissions generated during proposed construction activities 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 Emissions

Once project construction is complete, operational activities associated with the proposed project would be minimal. No routine daily equipment operation or vehicle trips would be required. While periodic maintenance, repair, and inspections would be conducted, these activities would not represent a substantial change in LADWP operations relative to existing conditions and would not require additional vehicle trips or workers. Specifically, there would be interior improvements within the existing Coldwater Canyon Pump Station (located along Oeste Avenue), consisting of the removal of four existing pump units, installation of four new pump units, replacement of valves within the pump station, and replacement of piping to accommodate the new pumps. However, the new pumps would be of a lower horsepower and are anticipated to result in lower emissions than the existing infrastructure because of increased efficiency. As such, operational GHG emissions would be nominal.

As shown in Table 3.8-1, amortized project-generated construction emissions would not exceed the 3,000 MT CO_2e per year SCAQMD threshold. Therefore, GHG emissions impacts would be less than significant.

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

Less Than Significant Impact. The proposed project would result in less than significant impacts related to conflicts with greenhouse gas emission reduction plans, for the reasons described below.

Consistency with the City of Los Angeles Sustainable City Plan

LADWP has not adopted a qualified climate action plan and the City of Los Angeles's Sustainable City Plan is not a quantified GHG reduction plan according to the CEQA Guidelines Section 15183.5 and thus cannot be used in a cumulative impact analysis to determine significance. However, a discussion of the project's consistency with the City's plan is provided for informational purposes. Table 3.8-2 provides an overview of the measures and goals set forth in the Sustainable City Plan and the project's consistency with these measures and goals. As shown in Table 3.8-2, the proposed project would not conflict with any of the GHG reduction measures or goals set forth in the Sustainable City Plan. Thus, the proposed project is consistent with this plan.

Table 3.8-2. Proposed Project Consistency with the Sustainable City Plan's GHG Emission Reduction Strategies

Sustainable City Plan Measure	Proposed Project Consistency
Water	
Reduce LADWP purchases of imported water by 50% by 2025 and source 50% of water locally by 2035.	Does not apply. The proposed project would not affect whether LADWP purchases water for its system or sources it locally, and, therefore, would not interfere with implementation of this goal.
Reduce average per capita water use by 22.5% by 2025 and 25% by 2035.	Does not apply. The project would not interfere with efforts to reduce per capita water use.
Solar Power	
Increase cumulative total megawatts (MW) of local solar photovoltaic power to 900-1,500 MW by 2025 and 1,500-1,800 MW by 2035.	Does not apply. The proposed project does not pertain to solar power and would not interfere with efforts to increase the use of solar power.
Increase cumulative total MW of energy storage capacity to at least 1,654-1,750 MW by 2025.	Does not apply. The proposed project does not pertain to energy storage and would not interfere with efforts to increase energy storage in the City.
Energy Efficient Buildings	
Reduce energy use per square foot below 2013 baseline for all building types by at least 14% by 2025 and 30% by 2035.	Does not apply. The proposed project involves underground pipelines and appurtenant structures. As such, the project would not interfere with efforts to reduce the energy use of buildings.

Table 3.8-2. Proposed Project Consistency with the Sustainable City Plan's GHG Emission Reduction Strategies

Sustainable City Plan Measure	Proposed Project Consistency
Use energy efficiency to deliver 15% of all LA's projected electricity needs by 2020.	Does not apply. Temporary energy use to power equipment during construction and minimal amounts of power to operate the flow control station vault would occur under the proposed project, The proposed project would not use substantial amounts of energy or electricity, as it would involve conveyance of potable water that is already flowing through LADWP's water distribution system. As such, measures for electricity efficiency would not apply to the project.
GHGs	
Reduce GHG emissions below 1990 baseline by at least 45% by 2025, 60% by 2035, and 80% by 2050.	Does not apply. The proposed project would not contribute to long-term GHG emission generation. As such, the proposed project would not interfere with efforts to reduce GHG emissions.
Improve GHG efficiency of LA's economy from 2009 levels by 55% by 2025 and 75% by 2035.	Does not apply. The proposed project would not contribute to long-term GHG emission generation. As such, the proposed project would not interfere with efforts to improve GHG efficiency.
Influence national and global action through the leadership of LA and other cities on climate change.	Does not apply. The proposed project would not interfere with efforts to influence action on climate change.
Have no ownership stake in coal-fired power plants by 2025.	Does not apply. The proposed project involves the replacement of potable water pipelines and, therefore, would not affect the ownership stake of coal-fired power plants.
Waste	
Increase landfill diversion rate to at least 90% by 2025 and 95% by 2035.	Consistent. The proposed project would produce waste during construction. Construction debris, such as pavement and excavated soils, would be reused on site or recycled to the extent feasible. Wastes would be diverted from landfills to the extent practicable and in accordance with state law. The proposed project would not generate waste during operation.
Increase proportion of waste production and recyclable commodities productively reused and/or repurposed within LA County to at least 25% by 2025 and 50% by 2035.	Does not apply. The proposed project would involve the replacement of pipelines, and therefore, would not interfere with efforts to increase reuse or repurposing of commodities. During construction, pavement and excavated soils would be reused on site or recycled as feasible. The proposed project would not generate waste during operation.

Source: City of Los Angeles 2015

Consistency with CARB's Scoping Plan

The CARB Scoping Plan, approved by CARB in 2008 and updated in 2014 and 2017, 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. The Scoping Plan is not directly applicable to specific projects, nor is it intended to be used for project-level evaluations.[8] 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 (i.e., hybrid, electric, and more fuel-efficient vehicles) and associated fuels (e.g., Low Carbon Fuel Standard), among others.

Consistency with the Southern California Association of Governments 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy

SCAG's 2016 RTP/SCS is a regional growth-management strategy that targets per capita GHG reduction from passenger vehicles and light-duty trucks in the Southern California region. The 2016 RTP/SCS incorporates local land use projections and circulation networks in city and county general plans. The 2016 RTP/SCS is not directly applicable to the project because the purpose of the 2016 RTP/SCS is to provide direction and guidance by making the best transportation and land use choices for future development (SCAG 2016). The proposed project would not conflict with implementation of the strategies identified in the 2016 RTP/SCS that would reduce GHG emissions.

The proposed project would not impede the attainment of the GHG reduction goals for 2030 or 2050 identified in Executive Order S-3-05 and Senate Bill (SB) 32. Executive Order S-3-05 establishes the following goals: GHG emissions should be reduced to 2000 levels by 2010, to 1990 levels by 2020, and to 80% below 1990 levels by 2050. SB 32 establishes a statewide GHG emissions reduction target whereby CARB, in adopting rules and regulations to achieve the maximum technologically feasible and cost-effective

[8] The Final Statement of Reasons for the amendments to the CEQA Guidelines reiterates the statement in 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 2009).

GHG emissions reductions, shall ensure that statewide GHG emissions are reduced to at least 40% below 1990 levels by December 31, 2030. While there are no established protocols or thresholds of significance for that future year analysis, 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).

CARB has expressed optimism with regard to both the 2030 and 2050 goals. It states in the First Update to the Climate Change Scoping Plan that "California is on track to meet the near-term 2020 GHG emissions limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32" (CARB 2014). With regard to the 2050 target for reducing GHG emissions to 80% below 1990 levels, the First Update to the Climate Change Scoping Plan states that the level of reduction is achievable in California (CARB 2014). CARB believes that the state is on a trajectory to meet the 2030 and 2050 GHG reduction targets set forth in AB 32, SB 32, and Executive Order S-3-05. This is confirmed in the Second Update, which states (CARB 2017):

> The Proposed Plan builds upon the successful framework established by the Initial Scoping Plan and First Update, while also identifying new, technologically feasibility and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health, including in disadvantaged communities. The Proposed Plan is developed to be consistent with requirements set forth in AB 32, SB 32, and AB 197.

The project would not interfere with implementation of any of the above-described GHG reduction goals for 2030 or 2050 because the project would not exceed the SCAQMD's recommended threshold of 3,000 MT CO_2e per year (SCAQMD 2008). Because the proposed project would not exceed the threshold, this analysis provides support for the conclusion that the project would not impede the state's trajectory toward the above-described statewide GHG reduction goals for 2030 or 2050.

The proposed project's consistency with the State's Scoping Plan would assist in meeting the City's contribution to GHG emission reduction targets in California. With respect to future GHG targets under SB 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 SB 32 40% reduction target by 2030 and the Executive Order S-3-05 80% reduction target by 2050. This legal interpretation by an expert agency provides evidence that future regulations will be adopted to continue the trajectory toward meeting these future GHG targets.

Based on the above considerations, the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. This impact would be less than significant.

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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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☒	☐	☐
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?	☐	☒	☐	☐
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?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☒	☐	☐

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

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

Less Than Significant Impact. Relatively small amounts of commonly used hazardous substances such as gasoline, diesel fuel, lubricating oil, adhesive materials, grease, solvents, and architectural coatings would be used during construction. These materials are not considered extremely hazardous and are used routinely throughout urban environments for both construction projects and structural improvements. Further, these materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. Consequently, use of these materials for their intended purpose would not pose a significant risk to the public or environment. Once construction has been completed, fuels and other petroleum products would no longer remain within the work area. Daily operation of the proposed project would not otherwise require the use, storage, or disposal of hazardous substances; however, operational activities would require scheduled maintenance and repair. Maintenance includes exercising valves and replacing or repairing worn appurtenances to ensure proper performance over the life of the facilities. These activities would require use of commercially available oils, greases, lubricants, and solvents. Use would be limited to the maintenance activity, and materials would not be stored on site. As with materials associated with construction, transportation and handling would be in accordance with federal, state, and local laws and regulations. Impacts would be less than significant.

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?

Less Than Significant Impact. As discussed under Section 3.9(a), construction would involve relatively small amounts of commonly used hazardous substances such as gasoline, diesel fuel, lubricating oil, grease, adhesive materials, solvents, and architectural coatings. These materials are not considered extremely hazardous and are used routinely throughout urban environments for both construction projects and small-scale structural

improvements. Further, these materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials.

Cement mortar used in concrete cradles, annular grouting, and coatings, may contain asbestos. Improper removal, transport, and/or disposal of such pipes would have the potential to cause release of asbestos to the environment, potentially resulting in exposure of workers and/or the public to asbestos. In accordance with SCAQMD Rule 1403, mortar would be surveyed for asbestos prior to demolition activities, and materials that contain asbestos would be removed, handled, transported, and disposed of in accordance with appropriate procedures defined in SCAQMD Rule 1403. With implementation of the requirements of SCAQMD Rule 1403, as well as adherence to all appropriate federal, state, and local rules and regulations regarding asbestos containing materials, the construction impacts would be less than significant.

As discussed in Section 3.9(a), limited scheduled maintenance activities would require the use of relatively small amounts of lubricants, greases, and possibly solvents. The amounts used would not be in such quantities that an upset or accident condition would occur should they be released. Use at the project site would be temporary. Impacts due to operation would be 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?

Less Than Significant with Mitigation Incorporated. Nearby schools include the Sunnyside Preschool, located at 3646 Coldwater Canyon Avenue; Harvard-Westlake Upper School, located at 3700 Coldwater Canyon Avenue; The Emerson Academy for Arts and Sciences, located at 12749 Ventura Boulevard; and, WISH private school, located at 12817 Moorpark Street.

Both the Emerson Academy for Arts and Sciences and the WISH private school are located 0.15 miles east of the proposed Unit 5, Phase II alignment, while the Harvard-Westlake Upper School is located between the proposed Unit 5, Phase II and Unit 6 alignments, in an area that would not be directly affected by project implementation. Sunnyside Preschool is located adjacent to the project site (CDE 2019).

As discussed in Section 3.9(a), project construction, maintenance, repairs, and inspections during operation would involve relatively small amounts of commonly used hazardous substances such as gasoline, diesel fuel, lubricating oil, grease, adhesive materials, solvents, and architectural coatings. These materials are not considered extremely hazardous, nor would any wastes be considered acutely hazardous. In the event of an accidental release of fuels, oils, lubricants, or other hazardous materials, hazardous emissions could occur within one-quarter mile of a school. All spills would be quickly contained and cleaned up. Potential effects would only occur during construction activities or operational maintenance/repair/inspection activities, which would be

temporary and localized. Hazardous substances would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. Use of these materials for their intended purpose and in accordance with applicable safety laws would not pose a significant risk to nearby schools.

Should excavation of contaminated soils or dewatering of contaminated groundwater occur (due to nearby hazardous material sites, see Section 3.9(d)), handling of these materials would be in accordance with applicable local, state, and federal laws and regulations to prevent exposure to the public. In addition, MM-HAZ-1 requires hazardous materials contingency measures be put in place during construction for the identification and management of hazardous soils and groundwater related to the hazardous material sites, should they be encountered (see Section 3.9(d)). This hazardous material contingency plan will include procedures to identify, handle, and remove contamination encountered during construction in a way to avoid endangering the public or the environment. These procedures would be sufficient to reduce potential impacts to nearby schools.

As discussed in Section 3.9(a), potential asbestos-containing concrete may be encountered. In accordance with SCAQMD Rule 1403, mortar would be surveyed for asbestos prior to demolition activities, and materials that contain asbestos would be removed, handled, transported, and disposed of in accordance with appropriate procedures defined in SCAQMD Rule 1403.

Daily operation of the proposed project would not require the use, storage, or disposal of hazardous substances. If there were any emergency condition involving the proposed project, the result would involve the release of potable water. In the event of pipeline failure, safety valves throughout the water distribution system may be shut off (as deemed necessary by LADWP) in response to a loss of pressure and to isolate the break. The volume of potable water released in such an event could cause flooding to nearby buildings, but would not result in a release of hazardous materials. Impacts would be less than significant with mitigation incorporated.

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 requires the Department of Toxic Substances Control, State Department of Health Services, SWRCB, and the California Department of Resources Recycling and Recovery to compile and annually update lists of hazardous waste sites and lands designated as hazardous waste sites throughout the state. The provisions

in Government Code Section 65962.5 are commonly referred to as the "Cortese List." The Cortese List includes the resources listed as follows:

- List of hazardous waste and substances sites from the (Department of Toxic Substances Control) EnviroStor database
- List of leaking underground storage tank (LUST) sites from the SWRCB GeoTracker database
- List of solid waste disposal sites identified by SWRCB with waste constituents above hazardous waste levels outside the waste management unit
- List of "active" cease-and-desist orders and cleanup and abatement orders from SWRCB
- List of hazardous waste facilities subject to corrective action identified by Department of Toxic Substances Control

Dudek conducted a search of regulatory databases that maintain information on hazardous material sites, including those listed above, for reference to the project site. Multiple sites were identified on Cortese List databases within a 1-mile radius of the proposed project. Dudek reviewed the listings, and summarized those that could potentially impact the project site based on environmental conditions, type of contamination, and distance to the project site. Table 3.9-1 details the Cortese List sites adjacent to the project alignment, including listings involving potentially contaminated soils and/or groundwater that could be encountered during proposed project construction. In addition, multiple closed LUST sites were identified along the project alignment, as listed in Table 3.9-2. While these are not on Cortese List databases (because they have been closed by the overseeing regulatory agency), some of the sites received low-threat closure, which allows contamination to remain in place. Table 3.9-2 includes the sites that fall into this category which are along the project alignment. Locations of the sites listed in Tables 3.9-1 and 3.9-2 are shown in Figure 3.9-1, Project Site Hazards.

Table 3.9-1. Cortese List Sites

Hazardous Site Name and Address	Regulatory Database	Distance/Direction from Project Alignment
Coldwater Cleaners Former Shell Station 4360 Coldwater Canyon Avenue	LUST, State Cleanup Program	Adjacent to the southeast
Details: This site is a former gasoline service station (Shell), and is currently operating as a dry cleaning facility (Coldwater Cleaners). It was a service station from at least 1950 to 1985. Four underground storage tanks (USTs) were removed in 1985. Due to leaks in the USTs, the soil and groundwater became contaminated with petroleum hydrocarbons and associated volatile organic compounds (VOCs). Multiple investigations and remediation activities occurred between 1994 and 2015. The dry cleaner operated in a separate building from at least 1950 until the site was remodeled in 1985, then dry cleaning operations continued in the new building. The dry cleaning operations are believed to have resulted in separate		

Table 3.9-1. Cortese List Sites

Hazardous Site Name and Address	Regulatory Database	Distance/Direction from Project Alignment
and additional VOC contamination, which was discovered in 2014. An investigation order was enforced by the Los Angeles Regional Water Quality Control Board in 2018, but to date no activities are recorded on GeoTracker (GeoTracker 2019). The most recent groundwater monitoring report (Wayne Perry 2019) states that groundwater levels have dropped since 2016, and therefore onsite monitoring wells have been dry since that time. Groundwater samples collected in January 2016 had concentrations of diesel-range petroleum hydrocarbons (TPH-d), gasoline-range petroleum hydrocarbons (TPH-g), benzene, toluene, ethylbenzene, and xylenes (BTEX), and diisopropyl ether (DIPE) .These levels were above the current regulatory screening levels for groundwater (California MCLs and California ESLs*). Groundwater monitoring was limited to the site, and was not conducted in the Coldwater Canyon Avenue right-of-way. The Conceptual Site Model (CSM) performed on the site in 2015 (Wayne Perry 2015) indicates that groundwater flow is to the northeast and southwest from a high point near the northwest corner of the site, away from the project site. Based on the most recent groundwater contamination levels detected in 2016, the fact that groundwater was not sampled from 2016 to 2019, the lack of groundwater data in the Coldwater Canyon Avenue right-of-way, and the fact that the regulatory file is still open, impacts to the project site cannot be ruled out.		

* California MCLs are the Maximum Contaminant Levels for groundwater used as drinking water defined by Department of Toxic Substances Control, HERO Note 3. California ESLs are the Environmental Screening Levels for groundwater for a variety of beneficial uses as defined by the San Francisco Regional Water Quality Control Board (and used statewide as reference screening levels).

Table 3.9-2. Hazardous Materials Sites (Non-Cortese List)

Hazardous Site Name and Address	Regulatory Database	Distance/Direction from Project Alignment
76 Station 1747 12863 Ventura Blvd	LUST (closed)	Adjacent to the east
Details: This is a former LUST site, which received low-threat regulatory closure in 2009. Final analysis of groundwater from the Coldwater Canyon Avenue right-of-way identified low levels of TPH-g, MTBE, and tert-butyl-alcohol (TBA) in groundwater within the project alignment (LARWQCB 2009). TBA concentrations were above the California MCL for groundwater. Therefore, there is a potential that residual contamination is present in the groundwater beneath the project site.		
Former Mobil #18-164 12904 Ventura Blvd	LUST (closed)	Adjacent to the west
Details: This is a former LUST site, which received low-threat regulatory closure in 2012. Final analysis of groundwater identified low levels of benzene, TPH-g, and MTBE in groundwater, which likely extended into the intersection of Ventura Blvd and Coldwater Canyon Avenue (LARWQCB 2012). The MTBE and TBA concentrations detected in the right of way exceed some of the California screening levels for groundwater. Therefore, there is a potential that residual contamination is present in the groundwater beneath the project site.		

SOURCE: Bing Maps 2019, Open Street Map 2019

FIGURE 3.9-1

Project Site Hazards

City Trunk Line South Unit 5 Phase II and Unit 6 Project

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Based on the sites listed in Tables 3.9-1 and 3.9-2, there is a potential that contaminated media (soil, groundwater, and soil vapor), may be present within the project alignment. These contaminated media could be encountered during construction activities.

Based on a review of historical aerials and available Sanborn Fire Insurance Maps, the project site has been paved public roads since at least 1928, with the exception of the southernmost tip along Oeste Avenue, which was paved in the 1930s. As discussed in Section 2.1, the original trunk line was installed in 1914. The Sanborn maps show gasoline stations at the northeast and southwest corners of the intersection of Ventura Boulevard and Coldwater Canyon Avenue, beginning in at least 1955. Both of these sites are identified in Tables 3.9-2. No other observations were noted that could indicate historical contamination on or adjacent to the project site.

In addition to the hazardous material sites listed above, there is also a potential for asbestos to be encountered during construction, as discussed in Section 3.9(a). There are no oil and gas wells located with the project alignment (DOGGR 2019), nor are there gas transmission or hazardous liquid pipelines along or crossing the project alignment (NPMS 2019). The project site is also not located within a methane buffer zone (LADPW 2004).

Once operational, the project would operate predominantly underground, with minimal to negligible operational activities, and would not disturb hazardous materials sites. Therefore, potential risks associated with the sites and potentially hazardous materials listed above would be limited to the construction period. Construction activities would occur in close proximity to the potential environmental conditions listed above. Potential hazards identified include encountering and releasing contaminated soil, soil vapor, groundwater, and/or asbestos. If contaminated materials are encountered and are not handled properly, they could create a hazard to the public, construction workers on the proposed project, or the environment. Petroleum and VOC contaminated soil, soil vapor, and/or groundwater, and asbestos-containing concrete could cause health exposure risks (e.g. potential carcinogens).

Mitigation measures MM-HAZ-1 has been included to reduce the potential hazards associated with the proposed excavation activities within and/or near the hazardous materials sites listed above. Specifically, implementation of MM-HAZ-1 would require preparation of and adherence to site-specific contingency measures, which would avoid or minimize hazards associated with excavation near the sites listed in Tables 3.9-1 and 3.9-2, as well as hazards associated with the potential of encountering asbestos. With the implementation of MM-HAZ-1 and compliance with all applicable federal, state, and local regulations, the potential for the proposed project to create a significant hazard to the public or environment due to its location on a hazardous materials site is low. Therefore, impacts related to hazardous materials sites would be less than significant with mitigation incorporated.

MM-HAZ-1: Hazardous Materials Contingency Measures

Prior to construction, the Los Angeles Department of Water and Power (LADWP) and/or its contractor shall implement contingency measures that address potential impacts in soil, soil vapor, and groundwater from releases at the sites listed in Tables 3.9-1 and 3.9-2. These measures shall include but are not limited to the following:

- Identification of known areas of concern.
- Training procedures for identification of contamination.
- Management, removal, disposal, and reporting of contaminated soils and/or groundwater in accordance with local and state regulations.
- Health and safety measures, including periodic work breathing zone monitoring, if appropriate, and AQMD Rule 1166 monitoring for volatile organic compounds (using a handheld organic vapor analyzer), in the event impacted soils are encountered during excavation activities.

LADWP and/or its contractor shall implement these contingency measures during construction activities for the proposed project. If encountered, asbestos cement shall be handled and disposed of in a manner that keeps the material in predominantly whole pieces to be considered nonfriable and in a manner consistent with United States Environmental Protection Agency requirements and SCAQMD Rule 1403. Samples shall be collected for laboratory analysis of asbestos prior to disposal, consistent with United States Environmental Protection Agency National Emissions Standard for Hazardous Air Pollutants regulations.

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?

No Impact. The nearest airport to the project alignment is the Hollywood Burbank (Bob Hope) Airport, located approximately 4.5 miles northeast of the proposed project (airnav.com 2019). The proposed project area is located well outside of the planning boundary of the Hollywood Burbank Airport (County of Los Angeles 2003). As such, the project area is not located within a 2-mile radius of any public airport, and no airport land use plans apply to the site. Therefore, the proposed project would not create an airplane safety hazard or result in excessive noise for people residing or working in the project area, and no impact would occur.

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

Less Than Significant with Mitigation Incorporated. The City of Los Angeles has a Local Hazard Mitigation Plan, which includes a thorough hazard vulnerability analysis, community disaster mitigation priorities, and plans for disaster mitigation strategies and projects. The City adopted its current Local Hazard Mitigation Plan in January 2018 (City of Los Angeles 2018a). Additionally, the Los Angeles County Department of Public Works designates disaster routes. Ventura Boulevard and Ventura Freeway (US 101) are designated disaster routes (County of Los Angeles 2012). US 101 is north of the project site, and is therefore not expected to be impacted by project construction activities. Ventura Boulevard crosses the project alignment at Coldwater Canyon Avenue. Lane closures may be required for work along Coldwater Canyon Avenue. However, closures would be limited to a single lane. As such, these roadways could continue to function as disaster routes during project construction, if necessary. Additionally, traffic control plans would be submitted to LADOT for review and approval before construction would begin. Alternate evacuation routes, as required, would be designated at that time.

As further explained in Section 3.17, incorporation of a Construction Traffic Control Plan, as required by MM-TRAF-1, would ensure that any temporary impacts to emergency vehicle flow and/or ingress/egress to properties along the alignment are coordinated in advance with emergency service providers and law enforcement to ensure that provision of sufficient emergency service, access, and evacuation can occur during construction if necessary. Implementation of MM-TRAF-1 would reduce impacts to local emergency service providers to less than significant levels. Upon operation, the new trunk line would be located predominantly underground or hanging beneath the Coldwater Canyon Avenue bridge over the Los Angeles River. Minor appurtenant structures would protrude above grade near the alignment; however, these structures would be small and would not obstruct emergency response or evacuation. The City's Local Hazard Mitigation Plan would proceed and be implemented with or without the proposed project. Impacts to emergency access and plans would be less than significant with mitigation incorporated.

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. The project area south of Valleyheart Drive is designated as a Very High Fire Hazard Severity Zone (VHFHSZ) (City of Los Angeles 2018b). Potential wildland fire impacts could occur if the project were to introduce additional people or structures to an area that is susceptible to wildland fire hazards. While the project is partially within potential fire hazard areas, it is not expected to expose people or structures to a significant risk of loss, injury, or death involving wildland fire. Potential wildland fire hazards could also occur if the proposed project were to cause a wildland fire risk, increase wildland fire risk in the area,

exacerbate the severity of a wildland fire, and/or exacerbate the severity of damage or hazards during a fire. Construction activities adjacent to or within wildlands can increase the risk of ignition. However, construction in each proposed project work area would be temporary and would occur within an existing roadway. Additionally, the City's Fire Code has brush clearance requirements for properties within VHFHSZs. It is expected that the properties adjacent to the project alignment have been and would continue to be maintained such that fire ignition hazards are minimized. For these reasons, project construction is unlikely to cause fire ignition or to expose workers to wildland fire hazards. Operation of the new trunk line would occur passively below ground with no potential to cause or exacerbate wildland fires or their impacts to people or structures in the vicinity of the proposed project alignment. As such, construction and operation of the proposed project would not expose any people or structures to a significant risk of loss, injury or death involving wildland fires, either directly or indirectly. Therefore, impacts would be less than significant.

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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 ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
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;	☐	☐	☐	☒

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. Water quality impacts could occur if construction activities resulted in spilled or leaked petroleum products and/or entrainment of sediment, debris, or other construction-related materials into stormwater runoff. In addition, the project may involve certain non-stormwater discharges, including trench dewatering discharges and hydrostatic testing discharges, that, if improperly performed, could contribute pollutants to the local storm drain system or receiving waters.

LADWP requires its workers and construction contractors to adhere to standard site management practices and applicable water quality regulations, which collectively would avoid or substantially minimize potential threats to water quality. Additionally, the nature and location of the pipe installation activities would pose an overall low threat to water quality, since construction activities would be of limited extent and duration in any one place at one time and would generally occur within an urban streetscape environment that flows to storm drains rather than flowing directly to natural creek corridors or infiltrating into the groundwater. However, the

project is located near and over the Los Angeles River and to the maximum practicable extent, should avoid direct/indirect runoff and spillage into or near the waterway.

To avoid adverse impacts on water quality, LADWP and/or its construction contractor would implement standard site management practices (e.g., perimeter controls, storm drain inlet protection, maintaining a clean and orderly work area, etc.) and would conduct construction activities in accordance with the statewide Construction General Permit (Order No. 2009-0009-DWQ/CAS000002, as amended). Where applicable, LADWP and/or its construction contractor would submit all permit registration documents to the SWRCB (including a SWPPP) which would demonstrate compliance with linear underground project requirements (Type 1). The SWPPP would include all applicable BMPs necessary to meet discharge prohibitions, effluent limitations, and other performance standards specified in the permit. The following list includes examples of BMPs that would be implemented during construction of the project:

- Storm drain inlets in the construction area would be surrounded by gravel bags or other suitable methods of filtration.
- All potential hazardous wastes would be contained, transported, and disposed of in accordance with applicable regulations.
- Construction work areas would be regularly swept and kept clean, orderly, and free of trash.
- Upon completion of construction activities, the area would be restored to pre-construction conditions.
- All authorized non-storm water discharges would be identified in the SWPPP along with BMPs that would be implemented to eliminate or reduce pollutants, which may include use of settling tanks or screens to reduce suspended sediment loads.

The specific location and type of BMPs to be implemented would be outlined in the SWPPP, which must be prepared by a qualified SWPPP professional. Construction would not begin until a waste discharge identification number and letter of coverage has been received from the SWRCB. Compliance with the Construction General Permit and the associated SWPPP prepared for the project would result in less than significant impacts to water quality during construction excavation.

If high groundwater is encountered during excavation, either a watertight shoring system would be implemented or dewatering may be required. As explained in Section 2.3, groundwater would be removed during the excavation of the trenches, usually by pumping it from the ground through dewatering wells that have been drilled along the alignment or by using sump pumps in the bottom of the excavation. The extracted groundwater would be pumped into a settling tank, tested, and then treated for any contaminants before being discharged to the storm drain system, in accordance with Los Angeles Regional Water Quality Control Board permit requirements, or to the sewer system in accordance with SCAR Permit requirements. If water is to be discharged to the storm drain system, LADWP would file a Notice of Intent to comply with the General NPDES Permit for Discharges of

Groundwater from Construction and Project Dewatering to Surface Waters (Order No. R4-2018-0125, NPDES No. CAG994004). LADWP would be required to comply with all applicable permit conditions.

In addition to stormwater runoff and dewatering discharges, construction may involve other sources of discharge water. Prior to operation, the new pipelines would be hydrostatically tested and disinfected with chlorine. As described in Section 2.3, hydrostatic test water and disinfectant water would be discharged directly into the storm drain or sewer systems. These actions would comply with the provisions of the Construction General Permit (if the storm drain system is used) or SCAR Permit requirements (if the sewer system is used). Compliance with the provisions of the Construction General Permit and/or SCAR Permit requirements would ensure that the processes of hydrostatic testing and disinfecting the new pipeline segments, as well as flushing the decommissioned pipeline segments, would not violate water quality standards or waste discharge requirements.

Once constructed, the new pipeline would be located underground with the exception of minor appurtenant structures and the proposed flow control station located within the LADWP property at 3380 Coldwater Canyon Avenue, and the work sites would be returned to pre-construction conditions. As the project would not involve changes in impervious surfaces or operational discharges, operation of the project would not be associated with increases in stormwater runoff, polluted runoff, or other types of water quality impacts. The water supplied by the proposed project would meet all applicable water quality standards. Based on the type and magnitude of activities anticipated during project construction and operation, the proposed project would not otherwise substantially degrade surface or ground water quality. Impacts 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?

Less Than Significant Impact. A project would have the potential to decrease groundwater supplies if it resulted in increased water usage from groundwater sources, such that overdraft conditions occur. The proposed project includes the replacement of an underground water trunk line, and would not draw upon groundwater supplies to the extent that such supplies would be compromised.

During construction, either a watertight shoring system would be implemented or dewatering may occur if groundwater is encountered during trenching and excavation activities. However, dewatering would be temporary, limited to the construction period, and would not occur in quantities that could substantially deplete groundwater supplies. The new pipeline would serve existing consumers in LADWP's service area and would not involve an increase in demand for groundwater.

The proposed project would occur primarily within existing, paved roadways that extend through developed areas. Repaving roadways after the replacement pipeline has been installed would not impede infiltration to a

greater extent than under existing conditions, as no change in impervious surface area would occur. The flow control station vault would slightly reduce the amount of pervious surfaces on the property at 3380 Coldwater Canyon Avenue. (This property is generally undeveloped and unpaved under current conditions.) However, the flow control station vault would have a footprint of approximately 1,500 square feet, which is negligible for the purposes of groundwater recharge. As such, changes in impervious surfaces would not occur to the extent that groundwater infiltration rates would be substantially affected. Therefore, the project would not deplete groundwater supplies or interfere substantially with groundwater recharge such that the project would impede sustainable groundwater management. Impacts 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?

No Impact. Construction would occur immediately upgradient of the Los Angeles River. However, project construction activities would not include excavations, in paved and unpaved areas, sufficient to alter topography or to change drainage patterns. During construction, some pavement would be temporarily removed from the roadways to allow for the installation of the new trunk line. However, all portions of the project area that would be disturbed during construction would be restored to pre-construction conditions. Changes in impervious surfaces would be minor and would generally be limited to installation of the flow control station vault, which would have a footprint of 1,500 square feet. Site conditions during project operation would be similar to existing conditions, and operation would not result in increased erosion or siltation in the area. For these reasons, no impact would occur. Refer to Section 3.7(b) above for a discussion of construction-related impacts as related to erosion and siltation.

ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

No Impact. As discussed above, changes in impervious surface area would be limited. Project construction activities would not include earthmoving or grading sufficient to alter topography or to change drainage patterns. During construction, some pavement would be temporarily removed from the roadways to allow for installation of the new trunk line segments. Once construction is complete, the excavated areas would be repaved. Changes in impervious surfaces would be minor and would generally be limited to installation of the flow control station vault, which would have a footprint of 1,500 square feet. Site conditions would be generally similar to existing conditions during project operation. As such, the project would not result in increased potential for flooding. For these reasons, no impacts would occur.

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?

No Impact. As discussed above, changes in impervious surface area would be limited. All portions of the project area disturbed during construction would be repaved and restored to pre-construction conditions. During operation, site conditions would be similar to existing conditions, and runoff patterns would not substantially differ from those under existing conditions. No impact would occur.

iv) impede or redirect flood flows?

No Impact. The project alignment is located within Zone X of the Federal Emergency Management Agency (FEMA) Flood Map Service (FEMA 2008). Zone X is considered an area of minimal flood hazard. All portions of the project area that would be disturbed during construction would be restored to pre-construction conditions once the new trunk line has been installed. As such, site conditions during project operation would be similar to existing conditions. The proposed project would operate passively, primarily below ground. As such, the proposed project would not be expected to impede or redirect flood flows. No impact would occur.

d) In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Less Than Significant Impact. The project alignment is located approximately 12 miles inland from the Pacific Ocean, and is not within a Tsunami Inundation Area (City of Los Angeles 1996). As a result, no tsunami risk is present.

Seiches are earthquake-induced waves in enclosed bodies of water, such as lakes or reservoirs. The Los Angeles River is the nearest body of water to the project site, located directly below and adjacent to a portion of the project alignment. Water flow within the river is generally very low. In the unlikely event that seismic activity occurs during a flood event, it is unlikely that a seiche would affect the portion of the pipeline that spans the river. As part of the project, this portion of the pipeline would be relined with CFRP, where Coldwater Canyon Avenue crosses the Los Angeles River. CFRP is an extremely strong composite material made from fiber-reinforced plastic.

As stated above, in Section 3.10(c)(iv), most of the project alignment is located in an area that is considered at minimal risk of flood hazards. The project site is, however, located within a dam inundation zone (City of Los Angeles 1996). The project site would be susceptible to inundation as a result of dam failure, but the extent of the damage would depend on the water level contained within the dam at the time of the collapse. However, overall, dam failure probability is considered low. In the event of inundation, the proposed pipeline would not be inundated, since it would be located primarily underground. For the section of the project alignment hanging

above the Los Angeles River, inundation would not compromise the segment as the exterior of the pipeline is impermeable. In the unlikely event that an inundation event was to adversely affect or compromise the pipeline, inundation would not release pollutants to the environment during a flood event, since the pipeline would convey potable water. For these reasons, impacts would be less than significant.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact. During project construction, the proposed project would comply with regional and local regulations requiring preparation of a SWPPP as well as with construction dewatering permit requirements, if necessary. During operation, the water supplied by the proposed project would meet all applicable water quality standards. The proposed project would not obstruct existing water quality control plans or sustainable groundwater management plans. In addition, the proposed project site is not considered a suitable site for groundwater recharge and would not introduce substantial new impervious areas over a significant groundwater recharge zone. Therefore, no impacts would occur related to conflicts with a water quality control plan or sustainable groundwater management plan.

References

City of Los Angeles. 1996. *Safety Element of the Los Angeles City General Plan.* https://planning.lacity.org/cwd/gnlpln/saftyelt.pdf.

FEMA (Federal Emergency Management Agency). 2008. "FEMA Flood Map Service Center: Search by Address." https://msc.fema.gov/portal/search.

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?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

a) Would the project physically divide an established community?

No Impact. The project alignment would be located within existing roadways. The proposed relining of an existing pipe would occur on a bridge over a portion of the Los Angeles River. Additionally, appurtenant structures would be installed as part of the proposed project. During construction, portions of the roadway would be closed, and some construction work and staging activities may also occur along adjacent sidewalks. These activities may create a temporary nuisance to residents and employees in the communities surrounding the project alignment; however, accessibility impacts during construction would be short term and temporary in nature. Additionally, access to the surrounding residences, businesses, and schools would be maintained during construction with two-way traffic being maintained where practicable.

Upon operation, the proposed project would not involve any access restrictions, since the project would include the replacement of a trunk line that is predominantly underground, or hanging underneath the existing bridge where Coldwater Canyon Avenue crosses the Los Angeles River. The proposed project would not be visible once completed. Appurtenant facilities such as isolation valves, blow-offs, air/vacuum valves, and the proposed flow control station vault would be visible above ground. However, these structures would be low profile and would not substantially contrast with the surrounding urban built-up environment. The proposed project would not include any aboveground buildings or infrastructure that would physically divide an established community. For these reasons, the proposed project would not physically divide an established community, and no impact would occur.

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

No Impact. The proposed project would be located within the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan (Community Plan) area within the City of Los Angeles. The project would be subject to the Community Plan and the City of Los Angeles General Plan. The project's consistency with these land use plans is described in the subsections below. The proposed project would also be subject to applicable portions of the Los Angeles Municipal Code.

Sherman Oaks-Studio City-Toluca lake-Cahuenga Pass Community Plan

According to the Community Plan, the overarching purposes and goals of the Community Plan include promoting an arrangement of land uses, streets, and services that will encourage and contribute to the economic, social and physical health, safety, welfare, and convenience of the people who live and work in the community (City of Los Angeles 2003).

The proposed project would involve the replacement of segments of the existing City Trunk Line South potable water trunk line within the Community Plan area, which is primarily residential and commercial in character.

During construction, temporary nuisances for residents, businesses and patrons, and people traveling through the Community Plan area may occur. Nuisances would include full or partial road closures, increased construction vehicles on the surrounding roadways, access restrictions, and increased construction noise (see Section 3.13, Noise, for more information). Construction, therefore, could temporarily affect the character of nearby neighborhoods and the function of the surrounding commercial corridors. However, the goals and policies set forth in the Community Plan involve long-term development patterns, of which sufficient and efficient utility infrastructure is a fundamental component.

Temporary construction activities would not affect the community's ability to preserve and enhance its neighborhoods, commercial corridors, and industrial areas. Additionally, this IS/MND sets forth a variety of mitigation measures that would reduce temporary construction noise and control temporary construction traffic (see Sections 3.13 and 3.17 of this IS/MND for details). Furthermore, the proposed project would enhance the reliability and resiliency of the water system in the area. Reliable and safe water supply to residences and businesses is necessary for achieving the goals and policies in the Community Plan, specifically those pertaining to the preservation and enhancement of residential neighborhoods, provision of new housing, improvements to commercial corridors, and improvements to the economic and physical condition of the Community Plan area. For these reasons, the proposed project would not conflict with the provisions of the Community Plan such that a significant environmental impact would result.

City of Los Angeles General Plan

The City of Los Angeles General Plan contains several elements that set forth policies for avoiding or mitigating environmental effects, including the Air Quality Element, Conservation Element, Noise Element, and Safety Element. Many of the policies pertain to land use patterns and commercial, residential, industrial, or open space land use and development and, therefore, do not apply to public works projects such as the proposed trunk line. However, there are a number of policies that apply to construction projects in general. Examples of these policies are listed below (City of Los Angeles 1992, 1999, 2001). The proposed project would not conflict with these policies.

- Air Quality Policy 1.3.1: Minimize particulate emissions from construction sites.
- Noise Objective 2: Reduce or eliminate non-airport related intrusive noise, especially relative to noise sensitive uses.
- Noise Policy 2.2: Enforce and/or implement applicable city, state, and federal regulations intended to mitigate proposed noise producing activities, reduce intrusive noise and alleviate noise that is deemed a public nuisance.
- Conservation Objective (Cultural Resources): Protect the City's archaeological and paleontological resources for historical, cultural, research, and/or educational purposes.

The proposed project would create construction-related air pollutant emissions and would also generate noise during construction near noise-sensitive uses. However, as described in Sections 3.3 and 3.13, these effects would be minimized to the extent practicable through compliance with regulations and/or implementation of mitigation measures. Regarding the conservation of archaeological and paleontological resources, the proposed project involves excavation of soils and therefore has the potential to uncover previously undiscovered resources. However, as explained in Section 3.5, 3.7, and 3.18, mitigation measures have been set forth to minimize the potential for previously undiscovered resources to be adversely affected by the project. For the reasons described above, the proposed project would not conflict with the policies set forth in applicable land use plans such that a significant environmental impact would result. As such, no impact would occur.

References

City of Los Angeles. 1992. *Air Quality Element of the City of Los Angeles General Plan*. Adopted November 24, 1992. Accessed August 29, 2019.//planning.lacity.org/cwd/gnlpln/aqltyelt.pdf.

City of Los Angeles. 1999. *Noise Element of the City of Los Angeles General Plan*. Adopted February 3, 1999. Accessed August 29, 2019. https://planning.lacity.org/cwd/gnlpln/noiseElt.pdf.

City of Los Angeles. 2001. *Conservation Element of the City of Los Angeles General Plan*. Adopted September 2001. Accessed August 29, 2019. https://planning.lacity.org/cwd/gnlpln/consvelt.pdf.

City of Los Angeles. 2003. *Sherman Oaks-Studio City-Toluca lake-Cahuenga Pass Community Plan*. Updated January, 2003. Accessed August 29, 2019. https://planning.lacity.org/complan/pdf/shrcptxt.pdf.

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?	☐	☐	☐	☒

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

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 California Department of Conservation, Division of Oil, Gas, and Geothermal Resources, there are no oil, gas, geothermal, or other known wells along the project alignment. The nearest oil well is located approximately one mile northwest of the proposed alignment's northern terminus; however, this well is registered as "plugged" and has been out of operation since 1963 (DOC 2013). The nearest active oil/gas well is located approximately 4.5 miles southeast of the project alignment's southernmost terminus (DOGGR 2019). Additionally, the proposed project would occur primarily within paved roadways that traverse an urban residential and commercial neighborhood, and, as such, does not support the extraction of oil, gas, and geothermal resources under existing conditions. As such, the proposed project would not interfere with oil, gas, or geothermal resource production.

The project site is within Mineral Resource Zone 1 (MRZ-1) and MRZ-3 for aggregate resources. MRZ-1 is defined as an "area(s) where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence." MRZ-3 is defined as "area(s) containing mineral deposits the significance of which cannot be evaluated from available data" (Division of Mines and Geology 1979). The proposed project would occur primarily within paved roadways that traverse an urban residential and commercial neighborhood, and, as such, the project site does not support any mineral extraction activities under existing conditions. Due to the generally developed nature of the project area and its surroundings, as well as the absence of known mineral resources mapped by the state, project implementation would not result in the loss of availability of a known mineral resource of value to the region and residents of the state. No impacts to state or regionally important mineral resources would occur.

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. As shown in the City of Los Angeles General Plan, the project alignment does not extend through a "Major Oil Drilling Area," as mapped by the City (City of Los Angeles 1996). Additionally, as described above under Section 3.12(a), the proposed project would occur primarily within paved roadways, which precludes extraction activities under existing conditions. As such, the proposed project would not interfere with oil, gas, or geothermal resource production. The project site is not delineated as a locally important mineral resource recovery site in the General Plan (City of Los Angeles 2001). The project site is located in a generally urbanized area and does not support any mineral extraction activities under existing conditions. Due to the generally developed nature of the project area and its surroundings, as well as the absence of significant mineral resources as mapped in the General Plan, project implementation is not anticipated to result in the loss of availability of a known mineral resource of value to the region and residents of the state. No impacts to locally important mineral resources would occur.

References

City of Los Angeles. 1996. *Safety Element Exhibit E – Oil Field and Oil Drilling Areas in the City of Los Angeles*. 1996. Accessed September 3, 2019. https://planning.lacity.org/cwd/gnlpln/saftyelt.pdf.

City of Los Angeles. 2001. *Conservation Element Exhibit A – Mineral Resources in the City of Los Angeles*. 2001. Accessed September 3, 2019. https://planning.lacity.org/cwd/gnlpln/consvelt.pdf.

DOC (Department of Conservation), Division of Mines and Geology. 1979. *Mineral Land Classification Map – Aggregate Resources Only*. Van Nuys Quadrangle (plate 2-20). May 25, 1979. Accessed September 3, 2019. ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_143/PartII/.

DOGGR (California Department of Conservation, Division of Oil, Gas, and Geothermal Resources). 2013. DOGGR Well Finder. Last updated May 23, 2013. Accessed September 3, 2019. ftp://ftp.consrv.ca.gov/pub/oil/WellRecord/037/03705969.

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?	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐
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?	☐	☐	☐	☒

Background Information for the Noise Analysis

Existing Noise Conditions

The proposed project alignment would be within the ROW of City streets (i.e., Coldwater Canyon Avenue, Avenida del Sol and Oeste Avenue). Adjacent land uses are predominately residential and commercial, with some educational and institutional land uses, including a school, a pre-school, and a church. Existing ambient noise measurements were conducted adjacent to the project alignment to characterize the existing noise environment. The daytime, short-term (1 hour or less) attended sound level measurements were taken with a Piccolo SoftdB sound-level meter. This sound-level meter meets the current American National Standards Institute standard for a Type 2 (General Purpose) sound-level meter. The calibration of the sound level meter was verified before and after the measurements were taken, and the measurements were conducted with the microphone positioned approximately 5 feet above the ground.

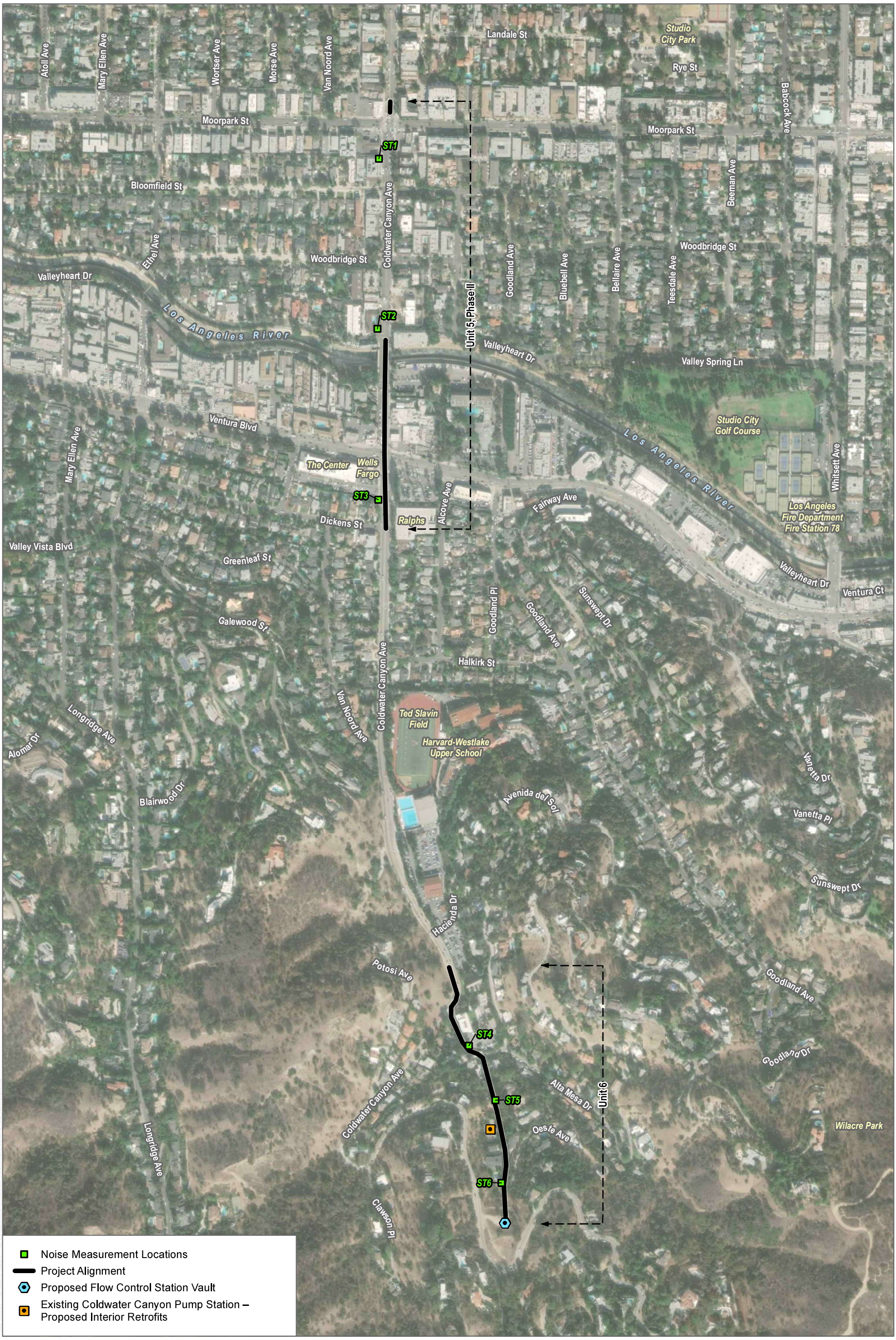
Six noise measurement locations were taken near noise-sensitive receptors adjacent to or near the project site. The measurement locations are shown in Figure 3.13-1, and the measured average noise levels and measurement locations are provided in Table 3.13-1 below.

The primary noise sources at the measurement locations consisted of traffic along the adjacent roads, except at ST5 and ST6, in which the primary noise source consisted of mechanical noise from adjacent infrastructure, as well as distant traffic, and construction noise. As shown in Table 3.13-1, existing ambient noise levels ranged from approximately 59 A-weighted decibels (dBA) equivalent continuous sound level (L_{eq}) (at location ST6) to approximately 72 dBA L_{eq} (at location ST1).

Table 3.13-1. Measured Noise Levels

Receptors	Address (Land Use)	Date	Time	Leq (dBA)	Lmax (dBA)
ST1	4353 Coldwater Canyon Avenue, Los Angeles (Residential)	June 27, 2019	9:34 a.m. – 9:49 a.m.	71.8	89.5
ST2	4265 Coldwater Canyon Avenue, Los Angeles (Residential)	June 27, 2019	10:32 a.m. – 10:48 a.m.	70.2	86.1
ST3	12903 Dickens Street, Los Angeles (Residential)	June 27, 2019	10:32 a.m. – 10:48 a.m.	69.8	85
ST4	Adjacent to parking lot for St. Michael's Episcopal Church and Preschool. Los Angeles	June 27, 2019	11:01 a.m. – 11:16 a.m.	64.4	79.1
ST5	3961 North Oeste Avenue, Los Angeles (Residential - under construction)	June 27, 2019	11:21 a.m. – 11:36 a.m.	64.2	79.2
ST6	3931 North Oeste Avenue, Los Angeles (Residential)	June 27, 2019	11:38 a.m. – 11:55 a.m.	59.1	75.8

Source: Dudek 2019
L_{eq} = equivalent continuous sound level (time-average sound level); L_{max} = maximum noise level; dBA = A-weighted decibels



SOURCE: Bing Maps 2019, Open Street Map 2019

Los Angeles Department of Water & Power

0 250 500 Feet

FIGURE 3.13-1

Noise Measurement Locations

City Trunk Line South Unit 5 Phase II and Unit 6 Project

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City of Los Angeles Noise Ordinance

The City of Los Angeles regulates noise through several sections of its Municipal Code: 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?

Less Than Significant with Mitigation Incorporated. Implementation of the proposed project would result in two primary types of potential noise impacts: short-term (i.e., temporary) noise during construction, and long-term noise during operation.

Construction

As described in Section 1.1, Project Overview and Section 2.2, Project Design, the proposed project would include three methods through which the trunk line replacements and improvements would be implemented, namely a) pipe jacking; b) open trenching, and c) CFRP lining. These construction methods and the CFRP lining process are described in detail in Section 2.3, Construction, and summarized below.

Pipe Jacking

Pipe jacking is a form of tunneling that is utilized to reduce disruptions at busy intersections and to extend underneath surface features along the alignment that are not suitable for open trench construction. Pipe jacking would be would be used to install approximately 620 linear feet of 60-inch WSP within Coldwater Canyon Avenue starting at Ventura Boulevard and ending at Valleyheart Drive South. Pipe jacking activities would last approximately six months and would require 28 construction workers.

The installation of pipelines using pipe jacking avoids the continuous surface disruption that is required for open trench construction. However, some surface disruption would still occur, since "jacking" and "receiving" pits are used and would be excavated along the project alignment. Pipe jacking involves a horizontal auger boring machine that is advanced in a tunnel bore to remove material ahead of or inside the jacking pipe. Powerful hydraulic jacks are used to push a steel jacking pipe from a launch (bore) pit to a receiving pit. As the tunneling machine is driven forward, a jacking pipe is added into the pipe string. As with open trench excavation, the primary phases for pipe jacking are site preparation, excavation, shoring, casing pipe installation, pipe installation, pressure testing, disinfection, and work site restoration.

Open Trench Excavation

Open Trench Excavation is typically used to install pipelines and their appurtenant features. The process consists of site preparation, excavation and shoring, pipe installation and backfilling, and work site restoration. Construction typically occurs within roadways and encompasses an approximately 800- to 1,000-foot work area. Open trench excavation would require approximately 12 construction workers throughout the construction period.

Carbon Fiber Reinforced Polymer Lining

As explained in Section 1.1, the proposed project would include reinforcing approximately 855 linear feet of the existing trunk line with CFRP, an extremely strong composite material made from fiber-reinforced plastic. Implementation of the CFRP lining would last approximately six months and would require 25 full-time construction workers.

Flow Control Station Vault

The proposed project would include the installation of an approximately 43.5 x 34 x 23-foot flow control station vault on the LADWP-owned property, located at 3380 Coldwater Canyon Avenue, Studio City. Construction of the flow control station vault would last for approximately one year and would require 25 full-time construction workers.

Coldwater Canyon Pump Station

The proposed project would also include interior improvements within the Coldwater Canyon Pump Station. These improvements would take place during proposed project construction with the same workers and equipment that are being used for the other activities.

Construction Noise Analysis Results

Noise impacts from construction activities associated with the proposed project would be a function of the noise generated by construction equipment, equipment location, sensitivity of nearby land uses, and the timing and duration of the construction activities. The nearest sensitive receptors to the project site are residences located as close as 30 feet from the project alignment. Because of the linear nature of the project, the amount of time that construction work would occur immediately adjacent to any one noise-sensitive receiver would generally be relatively short (typically, one to two days for open-trench pipeline installation). For trenchless installation and CFRP lining, it is anticipated that work would take place for approximately 6 months.

Construction of the proposed project would result in temporary localized increases in noise levels from on-site construction equipment, as well as from off-site trucks hauling construction materials. Noise generated by construction equipment would occur with varying intensities and durations during the various phases of construction. The typical maximum noise levels at a distance of 50 feet for various pieces of construction equipment anticipated to be used during construction are listed in Table 3.13-2. Note that these are maximum noise levels, not an average sound level. The equipment would operate in alternating cycles of full power and low power, thus producing noise levels that would ultimately fall below the maximum levels. The average sound level of the construction activity as a whole depends upon the amount of time that the equipment operates and the intensity of construction. As such, the average noise level during construction activity is generally lower, since maximum noise generation may only occur up to 50% of the time. Noise levels from construction operations decrease at a rate of approximately 6 dBA per doubling of distance from the source.

Table 3.13-2. Construction Equipment Noise Levels

Equipment Type	Maximum Noise Level dB(A) at 50 feet
Backhoe	80
Compactor	82
Concrete Mixer	85
Crane	83
Generator	81
Loader	85
Paver	89
Roller	74
Truck	88
Saw	76
Pile Driver	101

Source: DOT 2018

Noise from the construction phase of the proposed project was estimated using the Federal Highway Administration Roadway Construction Noise Model (FHWA 2008). Input variables for the Roadway Construction Noise Model 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. No topographical or structural shielding was assumed in the modeling of construction noise. Construction scenario assumptions, including phasing and equipment mix, were based on the project construction details described in Section 2.3 of this document and the CalEEMod default values developed for the Air Quality impacts analysis. Construction noise levels were assessed at two distances for each project phase. One represents the anticipated construction noise that may be experienced at the closest possible sensitive receptor (residences nearest to the proposed work areas). The second represents anticipated construction noise that may be experienced within the general vicinity of construction. Table 3.13-3 summarizes these estimated construction noise levels, with separate calculations provided for the different types of construction activities that would occur for this project. The detailed Roadway Construction Noise Model input and output is provided in Appendix D.

Table 3.13-3. Construction Noise Model Results Summary

Construction Phase	Construction Noise at Representative Receiver Distances (Leq (dBA))	
	Nearest Source-Receiver Distance (Approximately 30 Feet)[1]	*Typical Source-Receiver Distance (Approximately 150 Feet)*[2]
Cut and Cover	84	76
CFRP Installation	85	74
Pit Shoring for Pipe Jacking	95	85
Pipe Jacking	87	78
Flow Control Station Vault Installation	84	83
Flow Control Station Vault Architectural Coating	63	62

Source: Appendix D
Notes:
1 The exception is for the Flow Control Station Vault Installation and Architectural Coating phases, for which the nearest source/receiver distance is approximately 175 feet.
2 The exception is for the Flow Control Station Vault Installation and Architectural Coating phases, for which the typical source/receiver distance is approximately 200 feet.

As shown in Table 3.13-3, noise levels from construction activities would be as high as 95 dBA L_{eq} at the nearest existing residences, approximately 30 feet away, during the time in which the sending and receiving pits for pipe jacking (i.e., trenchless pipeline installation) would be excavated and constructed. However, this activity would occur for a brief time period relative to the other construction activities associated with the project and would occur in limited areas along the alignment. At more typical distances, construction noise would range from

approximately 62 to 85 dBA L_{eq}. Noise from the Coldwater Canyon Pump Station improvements would be minimal and less than the values shown in Table 3.13-3, as construction activities would occur inside a building.

Although nearby off-site residences would be exposed to elevated construction noise levels, the exposure would be short term and would cease upon completion of project construction. It is anticipated that active construction associated with the proposed project would generally take place within the allowable hours per Section 41.40 of the City of Los Angeles Municipal Code (7:00 am through 9:00 pm Monday through Friday, 8:00 am through 6:00 pm on Saturdays, if weekend work is necessary, and would not occur on Sundays or national holidays). In the event that construction is required to extend beyond these times, extended hours permits would be required. As such, construction would not violate City of Los Angeles standards for construction.

Construction noise levels would be substantially higher than existing ambient daytime noise levels, particularly within 30 feet of the proposed construction activities (see Tables 3.13-1 and 3.13-3). For this reason, noise impacts from construction would be considered potentially significant. However, MM-NOI-1 and MM-NOI-2 have been set forth to reduce construction noise associated with the proposed project and to ensure that nearby receptors are informed of construction activities. The effectiveness of the measures listed in MM-NOI-1 would vary from several decibels (which in general is a relatively small change) to 10 or more decibels (which would be perceived as a substantial change). The range of effectiveness would vary based on the equipment in use, the original condition of the equipment, the specific location of the noise source and receiver, etc. The noise reduction achieved by equipment silencers, for example, would range from several decibels to well over 10 decibels. Limiting equipment idling could reduce overall noise levels up to several decibels. However, the measures listed in MM-NOI-1, in conjunction, would result in a substantial decrease in construction noise. While MM-NOI-2 would not reduce construction noise levels, it would ensure that receptors in the project area are prepared for any nuisances that may occur and would allow them to plan accordingly. Upon implementation of MM-NOI-1 and MM-NOI-2, impacts would be less than significant with mitigation incorporated.

MM-NOI-1: Construction Noise Reduction

The Los Angeles Department of Water and Power and/or its construction contractor shall comply with the following measures during construction:

1. Construction activities shall not occur between the hours of 9:00 pm and 7:00 am Monday through Friday, 6:00 pm and 8:00 am on Saturday, or on Sundays or national holidays. In the event that construction is required to extend beyond these times, extended hours permits shall be required.
2. Pumps and associated equipment (e.g., portable generators etc.) shall be situated and configured so as to minimize noise at nearby noise-sensitive receivers.
3. Where possible, staging of construction equipment shall be situated at least 30 feet from noise- or vibration-sensitive land uses.
4. All noise-producing equipment and vehicles using internal combustion engines shall be equipped with mufflers; air-inlet silencers where appropriate; and any other shrouds, shields, or other noise-reducing features in good operating condition that meet or exceed original factory specification. Mobile or fixed "package" equipment (e.g., arc-welders, air compressors) shall be equipped with shrouds and noise control features that are readily available for that type of equipment.
5. All mobile or fixed noise-producing equipment used for the project that are regulated for noise output by a local, state, or federal agency shall be in compliance with regulations.
6. Idling equipment shall be kept to a minimum and moved as far as practicable from noise-sensitive land uses.
7. Electrically powered equipment shall be used instead of pneumatic or internal combustion powered equipment, where feasible.
8. Mobile equipment staging, parking, and maintenance areas shall be located as far as practicable from noise-sensitive receptors.
9. The use of noise-producing signals, including horns, whistles, alarms, and bells, shall be used for safety warning purposes only.

MM-NOI-2: Notification

Effective communication with local residents shall be maintained prior to and during construction. Specifically, the Los Angeles Department of Water and Power shall inform local residents of the schedule, duration, and progress of the construction. Additionally, residents shall be provided contact information for noise- or vibration-related complaints.

Operation

Operation of the proposed project would be predominantly belowground and would primarily be passive in nature. Any noise generated by the pipeline and associated mechanical equipment would occur predominantly underground and is anticipated to be negligible.

The proposed Coldwater Canyon Pump Station improvements would include replacing four existing pumps with new pumps. The new pumps would have slightly reduced horsepower ratings relative to the existing pumps that currently operate within the pump station. As such, noise produced by the new pumps would be similar to or less than noise produced by the existing pumps. Additionally, consistent with existing conditions, the pumps are located within an enclosed building. As such proposed aboveground appurtenant equipment (including the Coldwater Canyon Pump Station improvements) would not contribute to a notable change in the noise environment when compared to existing conditions. Maintenance activities would be minimal and would be similar to those that occur throughout LADWP's service area under existing conditions. No permanent workers would be required to operate or maintain the proposed project. Activities associated with long-term operations and maintenance would therefore be minimal. Noise associated with these activities would range from no noise to negligible amounts of noise and, therefore, would be less than significant.

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

Less Than Significant with Mitigation Incorporated. Construction activities may generate excessive groundborne vibration or groundborne noise, causing a potentially significant impact. Caltrans has collected groundborne vibration information related to construction activities (Caltrans 2013). Information from Caltrans indicates that continuous vibrations with a peak particle velocity of approximately 0.1 inches per second begin to cause annoyance. Heavier pieces of construction equipment, such as bulldozers, have peak particle velocities of approximately 0.089 inches per second or less at a distance of 25 feet, and impact-type pile drivers have typical peak particle velocities of approximately 0.644 inches per second at a distance of 25 feet (DOT 2018). Although vibratory pile driving (which is planned to be used for the proposed project) typically produces vibration levels less than those from impact-type devices (DFI 2015), the more conservative reference level documented for impact-type pile driving is used for this analysis.

Groundborne vibration typically attenuates over short distances. At the distance from the nearest residence to the construction area (approximately 30 feet) and with the anticipated construction equipment (with the exception of pit shoring for trenchless installation, which is addressed below), the peak particle velocity would be approximately 0.068 inches per second. At the closest sensitive receptors, vibration levels are not anticipated to exceed the vibration threshold of potential annoyance of 0.1 inches per second; although vibration would likely be perceptible when occurring nearby, these vibration levels would be below the threshold of annoyance and would only occur intermittently during transitory pipeline construction activities. Typically, open trench pipeline construction would proceed at a rate of approximately 15 feet per day, limiting the duration of vibration exposure to one week or less at any sensitive receptor location along the alignment. Therefore, vibration impacts related to open trench construction would be less than significant.

Noise- and vibration-sensitive receptors are located approximately 30 feet from the proposed trenchless installation near Ventura Boulevard. During pit shoring, in which pile driving is anticipated to be used, the resulting peak particle velocity during pile driving is estimated to be approximately 0.489 inches per second. This level would exceed the vibration threshold of potential annoyance of 0.1 inches per second and would be clearly perceptible. It should be noted, however, that pit shoring activities would be relatively brief at any one spot; it typically requires only several minutes to drive a pile of the size likely to be used for this project. Implementation of mitigation measure MM-NOI-1 would ensure that construction staging is situated farther than 30 feet from any sensitive receptors where possible, and MM-NOI-2 would ensure that sensitive receptors are notified of construction activities and are provided contact information for noise- or vibration-related complaints. Implementation of these measures would reduce vibration impacts at sensitive receptor locations to a less than significant level.

Construction can also affect nearby buildings by inflicting damage from vibration. However, construction vibration associated with this project would not result in structural building damage. Building damage typically occurs at vibration levels of 0.5 inches per second or greater for buildings of reinforced concrete, steel, or timber construction. The heavier pieces of construction equipment used for this project would include backhoes, front-end loaders, and flat-bed trucks. As discussed above, it is also anticipated that a vibratory hammer would be utilized during pit shoring. During this activity, vibration levels are anticipated to approach but not equal or exceed 0.5 inches per second, provided that pile driving does not take place within 30 feet of nearby buildings or their foundations. Once operational, the project would not generate substantial levels of groundborne vibration. As such, no building damage would be expected to occur as a result of project-related vibration during construction or operation. Overall, upon compliance with MM-NOI-1 and MM-NOI-2, impacts would be less than significant with mitigation incorporated.

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?

No Impact. The project area is not located within the vicinity of a private airstrip (Airnav.com 2019). Accordingly, no impacts related to exposing people residing or working in the project area to excessive noise levels related to private airstrips would occur. The nearest airport to the project is the Hollywood Burbank (Bob Hope) Airport, located approximately 4.5 miles to the northeast of the project area (Caltrans 2018). The proposed project area is located outside of the planning boundary of the Hollywood Burbank Airport or of other airports (County of Los Angeles 2003). As such, the project area is not located within a 2-mile radius of any public airport, and no airport land use plans apply to the site. Therefore, the project would not expose people residing or working in the project area to excessive noise related to public airports. No impact would occur.

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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)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

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)?

No Impact. The proposed project would replace segments of an aging potable water trunk line. The proposed project would not include construction or operation of any new residential or commercial land uses and, therefore, would not result in a direct population increase from construction of new homes or businesses. During the proposed construction activities, construction personnel would be required. The need for these workers would be accommodated within the existing and future labor market in the City and the surrounding Los Angeles metropolitan area. Under operational activities, the proposed project would be unmanned, requiring only periodic maintenance, repair, and inspection, and would therefore not require permanent employees for operation. As such, implementation of the proposed project would not result in a direct increase in the population of the area due to increases in employment opportunities.

Expanded infrastructure has the potential to indirectly induce population growth. However, the proposed project involves the replacement of an existing potable water trunk line for the purposes of enhancing system reliability and resiliency during normal operations. The pipeline was designed to meet existing water demands in the San Fernando Valley and City of Los Angeles and would ensure continued water service to the existing homes and businesses in that area. As such, the proposed project would not increase the service capacity of the potable water system in the area such that unplanned population growth would occur. Therefore, the proposed project would not induce population growth either directly or indirectly. No impact would occur.

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 replace segments of an existing trunk line and would not displace people or involve the removal of existing housing. As such, the proposed project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. No impact would occur.

References

None.

3.15 Public Services

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
Police protection?	☐	☐	☐	☒
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☐	☒

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

No Impact. The need for new or altered fire facilities is typically associated with an increase in population. As described under Section 3.14, the proposed project would not alter population in the project area. Construction of the proposed project could have the potential to reduce access for emergency vehicles near the work areas

during the construction period. However, all construction activities would be carried out in accordance with all applicable LADOT and Los Angeles Fire Department emergency access standards, and emergency access would be maintained during construction, as needed. Upon operation, the proposed trunk line repair and replacement project would be located predominantly underground, would not result in a localized population increase, and, as such, would not require additional fire protection services. As such, the proposed project would not alter service ratios, response times, or other performance objectives to the extent that new or expanded fire protection facilities, equipment, or staff would be required. No impact would occur.

Police Protection

No Impact. The need for new or altered police facilities is typically associated with an increase in population. As described under Section 3.14, the proposed project would not alter population in the project area. Construction of the proposed project could have the potential to reduce access for emergency vehicles near the work areas during construction activities. However, all construction activities would be carried out in accordance with all applicable LADOT and Los Angeles Police Department emergency access standards, and emergency access would be maintained during construction as needed. Upon operation, the proposed trunk line repair and replacement project would be located predominantly underground, would not result in a localized population increase, and, as such, would not require additional police protection services. As such, the proposed project would not alter service ratios, response times, or other performance objectives to the extent that new or expanded police protection facilities, equipment, or staff would be required. No impact would occur.

Schools

Less Than Significant Impact. The need for new or altered school facilities is typically associated with an increase in local population such that student enrollment in district schools increases consecutively. As described under Section 3.14, the proposed project would not alter population in the project area. However, construction of the proposed project could have the potential to temporarily interfere with access to schools in the project area. Specifically, nearby schools include the Sunnyside Preschool, located at 3646 Coldwater Canyon Avenue; Harvard-Westlake Upper School, located at 3700 Coldwater Canyon Avenue; The Emerson Academy for Arts and Sciences, located at 12749 Ventura Boulevard; and, WISH private school, located at 12817 Moorpark Street.

Both the Emerson Academy for Arts and Sciences and the WISH private school are located 0.15 miles east of the proposed Unit 5, Phase II alignment, while the Harvard-Westlake Upper School is located between the proposed Unit 5, Phase II and Unit 6 alignments, in an area that would not be directly affected by project implementation. Of these nearby schools, only Sunnyside Preschool, which is located immediately north of the Unit 6 segment of the trunk line, is within immediate proximity to the project alignment. However, interferences to school access would be limited to temporary increases in traffic and obstructions along roadways and

sidewalks in the vicinity of the schools due to construction activities and staging. These effects would be temporary, and access to each school would be maintained throughout construction. Operation of the project would occur underground in the vicinity of the nearby schools, and, as such, would not impact school operations. The proposed project would not induce population growth and would not increase the population of children of school-attending age in the Studio City neighborhood. For these reasons, the proposed project would have a less than significant impact on the ability of existing schools to accommodate students to the extent that new or expanded school facilities, materials, or staff would be required.

Parks

No Impact. The need for new or altered parks is typically associated with an increase in population. As described under Section 3.14, the proposed project would not alter population in the project area. As such, project construction and operation would have no impact on nearby parks. The proposed project would not alter the ability of parks to serve the region to the extent that new or expanded parks would be required. No impact would occur.

Other Public Facilities

No Impact. Other public facilities include libraries and government administrative services. The need for new or altered libraries or administrative services is typically associated with an increase in population. As described under Section 3.14, the proposed project would not result in notable population growth and, as such, would not result in the need for new or expanded libraries or other government administrative services. No impact would occur.

References

None.

3.16 Recreation

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

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. The proposed project is located in an urban area, predominantly surrounded by commercial and residential development. The proposed project would not be located within the immediate vicinity of an existing neighborhood park, regional park, or other recreational facility. There are two parks within proximity to the project alignment, namely Coldwater Canyon Open Space area (to the west) and Wilacre Park (to the east). Both Coldwater Canyon Open Space and Wilacre Park are separated from the project site by interceding residential development. The proposed project would include the replacement of an existing trunk line and small, appurtenant structures within the ROW of Coldwater Canyon Avenue, Oeste Avenue, and Avenida Del Sol, installation of a flow control station at the LADWP property located at 3380 Coldwater Canyon Avenue, and interior improvements within the existing Coldwater Canyon Pump Station. The proposed project would not include the construction of any habitable structures, and, as such, would not result in local population growth in the Studio City neighborhood (see Section 3.14 for details). The proposed project would not result in population increases resulting in an increased need for park facilities. Project construction and operation would not increase the use of existing neighborhood and regional parks or other recreational facilities. No impact would occur.

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 stated above in Section 3.15(a), the need for new or altered parks is typically associated with an increase in population. The proposed project would not alter population in the project area. There are two parks within proximity to the project alignment, namely Coldwater Canyon Open Space area (to the west) and Wilacre Park (to the east). Both Coldwater Canyon Open Space and Wilacre Park are separated from the project site by interceding residential development. Project construction could temporarily interfere with access to public parks and facilities in the project vicinity. However, these effects would be temporary in nature and access to all parks

and recreation facilities would be maintained throughout the construction period. The proposed project is a trunk line repair and replacement project and would not include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment. For these reasons, the proposed project would not alter the ability of parks to serve the region to the extent that new or expanded parks would be required. No impact would occur.

References

None.

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?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☒	☐	☐
d) Result in inadequate emergency access?	☐	☒	☐	☐

The following provides background information for the transportation analysis:

Project Study Area

The proposed study area extends along Coldwater Canyon Avenue, from Moorpark Street to Dickens Street, and along Oeste Avenue to the south. Once on Coldwater Canyon Avenue, pipe jacking, cut and cover, and bridge hanging would occur from Woodbridge Street to Dickens Street. Cut and cover and CFRP pipe lining would also occur along Avenida Del Sol and Oeste Avenue. Figure 3.17-1 shows the project site location and study area roadway segments.

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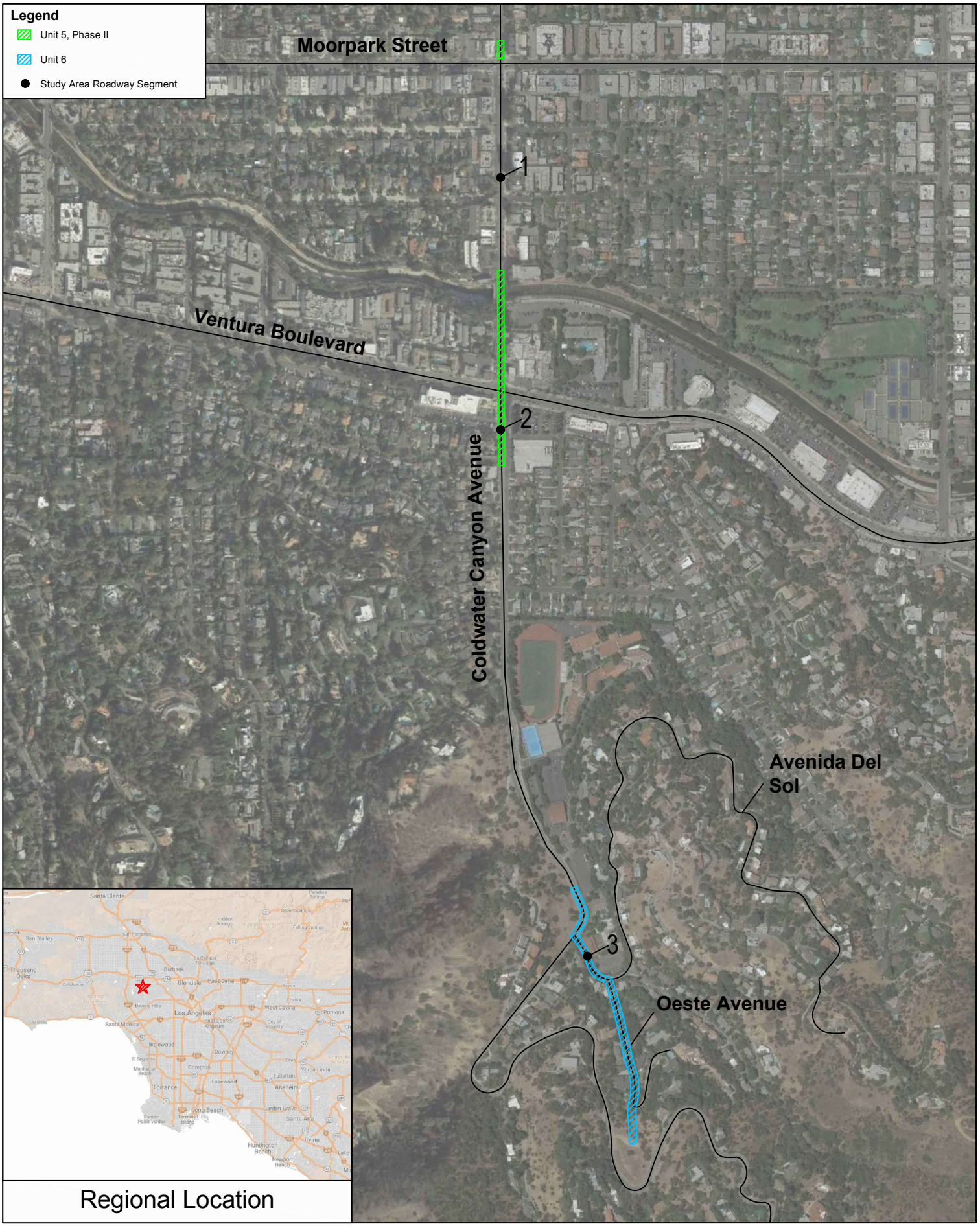

Source: Google Maps 2018

LA DWP Los Angeles Department of Water & Power

NOT TO SCALE

FIGURE 3.17-1

Project Site Location and Study Area

City Trunk Line South Unit 5 Phase II and Unit 6 Project

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Existing Conditions

The following presents a description of the existing street network conditions in the study area.

Street Network

Characteristics of the existing street system in the study area are shown in Table 3.17-1.

Table 3.17-1. Study Area Existing Street System Summary

Roadway	Street Classification	Posted Speed Limit (MPH)	# of Travel Lanes	Parking	Sidewalks	Bicycle Lanes
Ventura Boulevard	Boulevard II	35	4 w/ TWLTL	Some sections/ Metered	Yes	No
Coldwater Canyon Avenue	Avenue II[1]	35	2-4 w/ TWLTL	Some sections/ Parking restrictions[2]	Some sections	No
Moorpark Street	Avenue II	35	2 w/ TWLTL	Some sections/ Parking restrictions[2]	Yes	Yes
Valleyheart Drive	Collector Local Street – Standard	20[3]	2	Some sections/ Parking restrictions[2]	Some sections	No
Dickens Street	Collector Local Street – Standard	20[3]	2	Yes/ Parking restrictions[2]	Some sections	No
Avenida del Sol	Collector Local Street – Standard	15[3]	2	No	No	No
Oeste Avenue	Hillside Standard/Limited[4]	15[3]	2	No	No	No

Source: City of Los Angeles 2015
Notes: MPH = miles per hour; TWLTL = two-way left-turn lane

1 Also designated as a scenic highway south of Ventura Boulevard by the City of Los Angeles Citywide General Plan Circulation System Map A3 – West Suburbia

2 Parking restrictions on certain days/times for street cleaning.

3 No posted speed limits found; speed limits noted are design speeds from the City of Los Angeles Complete Streets Design Guide for the indicated street classifications.

4 Indicated as "unidentified" by NavigateLA (City of Los Angeles Bureau of Engineering, Department of Public Works interactive map); based on street width and location, Oeste Avenue could be classified as a Hillside Standard or Hillside Limited street.

Transit System

The Los Angeles County Metropolitan Transportation Authority provides bus transit service in the project study area via Routes 150, 167, and 750.

Route 150/240 provides Monday through Sunday service along Ventura Boulevard, from Canoga Park to Studio City. Weekday and weekend/holiday service is 24 hours, with service every hour to every quarter-hour depending on the time of day and stop. Routes 150 and 240 operate along the same route, with the exception that Route 240 travels along Reseda Boulevard and Route 150 travels along Topanga Canyon Boulevard to and from Canoga Park.

Route 167 provides Monday through Sunday service along Coldwater Canyon Avenue and Plummer Street from California State University Northridge to Studio City. Weekday service runs from 4:31 a.m. to 12:03 a.m., with service approximately every 45 minutes, limited on weekends, holidays, and off-peak periods to every hour.

Route 750 provides service along Ventura Boulevard, from Canoga Park to Studio City. Route 750 operates a similar route to Route 150/240; however, only Monday through Friday service is provided, with service running from 5:08 a.m. to 10:06 p.m. every 15 to 20 minutes.

Senate Bill 743

On September 27, 2013, SB 743 was signed into law, which creates a process to change the way that transportation impacts are analyzed under CEQA. SB 743 requires that the Governor's Office of Planning and Research (OPR) amend the CEQA Guidelines to provide an alternative to level of service (LOS) for evaluating transportation impacts. Once the new transportation guidelines are adopted, LOS, or automobile delay, will no longer be considered an environmental impact under CEQA. Per OPR's Final Proposed Updates to the CEQA Guidelines released on November 27, 2017, OPR proposes to add Section 15064.3 to the CEQA Guidelines, which would provide that, in most cases, vehicle miles traveled is the most appropriate measure of transportation impacts. OPR also proposed several changes to the questions related to transportation in Appendix G of the CEQA Guidelines. First, OPR proposed to revise the question related to "measures of effectiveness" (threshold question A) so that the analysis focuses on circulation elements of city and county general plans and other land use plans governing transportation. Second, OPR proposed to delete the second question related to LOS and insert references to proposed new Section 15064.3. Third, OPR proposed to clarify the question related to design features.

The new Section 15064.3(b), Criteria for Analyzing Transportation Impacts, states "If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate."

OPR's regulatory text indicates that a public agency may immediately commence implementation of the transportation impact guidelines, and that the guidelines shall apply statewide by July 1, 2020. The following analysis section utilizes the recently updated significance thresholds per Appendix G of the CEQA Guidelines.

Transportation Analysis

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. Construction of the proposed project is anticipated to commence in November 2021 and would end in May 2023. Construction would occur between the hours of 7:00 a.m. and 6:00 p.m., Monday through Friday. Nighttime construction work is not anticipated; however, in the event that extended hours, including nighttime hours, are required, additional permits would be required. Additional construction assumptions are provided in Section 2.3 of this IS/MND.

Based on the weekday construction hours, most trips generated by construction workers would occur before the AM peak hour since the daily work shift starts at 7:00 a.m. Similarly, most would leave after the PM peak hour at 6:00 p.m. For the purposes of this analysis, it is conservatively assumed that 15% of construction worker traffic may arrive after 7:00 a.m., during the AM peak hour, and 15% may leave before 6:00 p.m., during the PM peak hour. The vendor trucks were assumed to be distributed evenly throughout the work shift, while the haul trucks would be generated in the middle of the day, in between the AM and PM peak hours. Based on estimates of the maximum number of construction workers and vendor and haul trucks for the peak construction phase (i.e., overlapping of the Site Preparation [Cut and Cover], CFRP Installation, and Pipe Jacking construction phases), Table 3.17-2 provides the project trip generation for the peak construction phase.

Table 3.17-2. Peak Construction Phase Trip Generation

Vehicle Type	Daily Quantity		Daily Trips	AM Peak Hour			PM Peak Hour		
				In	*Out*	*Total*	*In*	*Out*	*Total*
Trip Generation									
Site Preparation - Cut and Cover									
Workers[1]	28	workers	56	5	0	5	0	5	5
Vendor Trucks[2]	6	trucks	12	1	1	2	1	1	2
Haul trucks[3]	2	trucks	4	0	0	0	0	0	0
Subtotal Site Preparation - Cut and Cover			*72*	*6*	*1*	*7*	*1*	*6*	*7*
Carbon Fiber Reinforced Polymer (CFRP) Installation									
Workers[1]	25	workers	50	4	0	4	0	4	4
Vendor Trucks[2]	0	trucks	0	0	0	0	0	0	0
Haul trucks[3]	1	trucks	2	0	0	0	0	0	0
Subtotal CFRP Installation			*52*	*4*	*0*	*4*	*0*	*4*	*4*

Table 3.17-2. Peak Construction Phase Trip Generation

Vehicle Type	Daily Quantity		Daily Trips	AM Peak Hour			PM Peak Hour		
				In	*Out*	*Total*	*In*	*Out*	*Total*
Pipe Jacking									
Workers[1]	28	workers	56	5	0	5	0	5	5
Vendor Trucks[2]	6	trucks	12	1	1	2	1	1	2
Haul trucks[3]	1	trucks	2	0	0	0	0	0	0
Subtotal Pipe Jacking			*70*	*6*	*1*	*7*	*1*	*6*	*7*
Total			**194**	**16**	**2**	**18**	**2**	**16**	**18**
Trip Generation with PCE									
Site Preparation - Cut and Cover									
Workers (1.0 PCE)	28	workers	56	5	0	5	0	5	5
Vendor Trucks (2.0 PCE)	6	trucks	24	2	2	4	2	2	4
Haul Trucks (3.0 PCE)	2	trucks	12	0	0	0	0	0	0
Subtotal Open Trench (w/ PCE)			*92*	*7*	*2*	*9*	*2*	*7*	*9*
Carbon Fiber Reinforced Polymer (CFRP) Installation									
Workers (1.0 PCE)	25	workers	50	4	0	4	0	4	4
Vendor Trucks (2.0 PCE)	0	trucks	0	0	0	0	0	0	0
Haul Trucks (3.0 PCE)	1	trucks	6	0	0	0	0	0	0
Subtotal CFRP Installation (w/ PCE)			*56*	*4*	*0*	*4*	*0*	*4*	*4*
Pipe Jacking									
Workers (1.0 PCE)	28	workers	56	5	0	5	0	5	5
Vendor Trucks (2.0 PCE)	6	trucks	24	2	2	4	2	2	4
Haul Trucks (3.0 PCE)	1	trucks	6	0	0	0	0	0	0
Subtotal Pipe Jacking (w/ PCE)			*86*	*7*	*2*	*9*	*2*	*7*	*9*
Total (w/ PCE)			**234**	**18**	**4**	**22**	**4**	**18**	**22**

Source: Dudek 2019

Notes: PCE = Passenger Car Equivalents

1 As construction hours are from 7:00 a.m. to 6:00 p.m., this analysis assumes the majority of construction workers will arrive prior to the AM peak hour and leave after the PM peak hour; approximately 15% of construction workers are conservatively assumed to overlap into the AM or PM peak hours.

2 Vendor trucks are assumed to be distributed evenly across the 11-hour work shift.

3 For the purposes of this analysis, it is assumed that at least one haul trip would occur per day during the peak construction period in the Pipe Jacking and CFRP Installation phases and two haul trips would occur per day in the Site Preparation phase.

As shown in Table 3.17-2, the project is expected to generate approximately 194 daily trips during the peak period of construction, with 18 AM peak-hour trips (16 inbound and 2 outbound), and 18 PM peak-hour trips (2 inbound and 16 outbound). With the application of passenger-car equivalence (PCE) factors to truck trips, the proposed project would generate 234 PCE daily trips, with 22 PCE trips during the AM peak hour (18 inbound and 4 outbound) and 22 PCE trips during the PM peak hour (4 inbound and 18 outbound).

Per the updated CEQA thresholds for VMT, the City's minimum threshold for the analysis of land use project impacts is 250 or more daily trips. As described above, the proposed project would not develop a new (permanent) land use; but would temporarily generate 194 daily trips (234 daily PCE trips) during the peak construction period. As construction is temporary, all trips associated with the project would cease after replacement of the trunk line. Any trips associated with operational activities would be limited to scheduled maintenance, repair, and inspection, and would result in negligible traffic to the study area.

The Los Angeles County Congestion Management Program requires evaluation of all Congestion Management Program arterial monitoring intersections where the project would add 50 or more new peak-hour trips. As shown in Table 3.17-2, construction of the proposed project would generate 18 trips in both the AM and PM peak hours (22 trips when adjusted with PCE) and therefore would not require a Congestion Management Program analysis. Additionally, operational activities required for scheduled maintenance, repair, and inspection would not generate 50 or more new peak-hour trips, as they would be minimal, intermittent, and similar to those that occur throughout LADWP's service area under existing conditions. Since the project would not result in the generation of additional future traffic, conflicts with an applicable congestion management program or standards would not occur during operation.

It should be noted that while the trip generation estimates of the peak construction phase include traffic destined to/from the site, workers would be situated in different areas along the two alignments. Unit 5, Phase II construction would occur along Coldwater Canyon Avenue, between Dickens Street and Valleyheart Drive, and Unit 6 construction would occur further south along Coldwater Canyon Avenue and onto Avenida Del Sol and Oeste Avenue. Figure 3.17-1 shows the approximate locations of both alignments, and Figure 2-1 shows approximate locations of all components. As shown in Figure 2-1, CFRP Installation and Site Preparation (Cut and Cover) would occur in both locations, and Pipe Jacking would only occur in Unit 5, Phase II. Therefore, during peak construction intensity, the trip generation estimates would not be concentrated in one particular area along the project alignment. Table 3.17-3 shows an approximate split of average daily traffic along roadway segments within the study area.

Table 3.17-3. Existing plus Project Average Daily Traffic Summary

No.	Roadway Segment	Classification	No. of Lanes	Existing ADT	Project ADT	Existing plus Project ADT
Coldwater Canyon Avenue						
1	Valleyheart Drive to Moorpark Street	Avenue II	4	28,870	97	28,967
2	South of Ventura Boulevard	Avenue II	2 (w/TWLTL)	24,353	97	24,450
Avenida Del Sol						
3	Coldwater Canyon Ave to Oeste Ave	Local Street - Standard	2	1,549	62	1,611

Table 3.17-3. Existing plus Project Average Daily Traffic Summary

No.	Roadway Segment	Classification	No. of Lanes	Existing ADT (PCE)	Project ADT (PCE)	Existing plus Project ADT (PCE)
Coldwater Canyon Avenue						
1	Valleyheart Drive to Moorpark Street	Avenue II	4	29,611	117	29,728
2	South of Ventura Boulevard	Avenue II	2 (w/TWLTL)	25,088	117	25,205
Avenida Del Sol						
3	Coldwater Canyon Ave to Oeste Ave	Local Street - Standard	2	1,598	74	1,672

Source: Dudek 2019; NDS 2019 – ADT counts collected in May, 2019.
Notes: PCE = Passenger Car Equivalents; ADT = Average Daily Traffic; w/TWLTL = with two-way left-turn lane

Construction of the proposed project would require the use of open-trench construction methods as well as pipe jacking and CFRP lining methods. The general process consists of utility clearance/mark-out activities, site preparation, excavation, shoring, pipe installation, backfilling, and work area street restoration. Construction staging would occur on the streets where the construction is taking place, within the ROW and nearby LADWP properties. The potential effects of open trenching and trenchless installation along the project alignment are described and analyzed below. Section 2.3 provides a detailed discussion of each construction method.

Pipe Jacking

As described in Section 2.3, pipe jacking is a form of tunneling that is utilized to reduce disruptions at busy intersections and to extend underneath surface features along the alignment that are not suitable for open trench construction. Pipe jacking would be used to install approximately 620 linear feet of 60-inch WSP within Coldwater Canyon Avenue starting at Ventura Boulevard and ending at Valleyheart Drive South.

A jacking pit and a receiving pit are used for each location that would require jacking, typically one at each end of the pipe segment. The distance between the jacking and receiving pit would be approximately 620 feet, but may be longer or shorter depending on the soil or site conditions. The jacking pits would generally have interior dimensions of 42 feet long by 17 feet wide, and the receiving pits would have interior dimensions of approximately 25 feet by long by 27 feet wide. Coldwater Canyon Avenue is approximately 60-feet wide along the pipe jacking segment, therefore providing sufficient width for at least two lanes of traffic. As indicated in Section 2.3, prior to the start of pipe jacking activities, LADWP would coordinate with the LADOT to prepare traffic control plans. The traffic control plans would delineate the traffic lanes

around any proposed work areas, as well as address any impacts to turn lane pockets at major intersections that could be affected during project construction.

Open Trench Excavation

Open Trench Excavation is a construction method that is typically used to install pipelines and their appurtenant features. The process consists of site preparation, excavation and shoring, pipe installation and backfilling, and work site restoration. Construction typically occurs within roadways and encompasses an approximately 800- to 1,000-foot work area. As detailed in Section 2.3, prior to the start of open trench excavation, LADWP would coordinate with LADOT to prepare traffic control plans. The traffic control plans would delineate the traffic lanes around any proposed work areas, as well as address any impacts to turn lane pockets at major intersections that could be affected during project construction. Where practicable, two-way travel along the affected roadways would be maintained throughout construction. Construction would primarily occur along one side of the street and would progress along the alignment with the maximum length of open trench being approximately 500 feet in length at any one time. The size of the trench required for this project would be approximately 8 feet wide to accommodate the new 60-inch-diameter pipeline installation.

The open-trench method would be used along sections of the alignment for both Unit 5, Phase II, and Unit 6. Partial block closures would be necessary for installing the new pipeline and its appurtenances; however, no full street closures are anticipated, and at least one lane of travel will be maintained along all street segments.

Carbon Fiber Reinforced Polymer Lining

As described in Section 2.3, the proposed project would include reinforcing approximately 855 linear feet of the existing trunk line. CFRP Lining would occur within existing manhole accesses and would therefore provide the lowest impact to the surrounding roadways.

As detailed above, construction activity may block parking, portions of travel lanes or full blocks, restrict access to driveways, disrupt access for emergency providers, and result in potential safety issues and nuisances for vehicular traffic, pedestrians, bicyclists, and transit riders along Coldwater Canyon Avenue, Avenida Del Sol, Oeste Avenue, and some of the intersecting cross streets. Potential safety issues and nuisances, as well as appropriate mitigation, are discussed in Section 3.17(c) and 3.17(d). The Mobility Plan 2035 element of the City of Los Angeles General Plan details the existing transit, roadway, bicycle, and pedestrian facilities as well as plans and policies to implement enhanced facilities throughout the City. Although temporary inconveniences and conflicts may occur for vehicular traffic, pedestrians, bicyclists, and transit riders during the construction period, the project would not conflict with the plans and policies detailed in the Mobility Plan 2035.

Additionally, no permanent workers would be required to operate or maintain the proposed project as operational activities would be limited to scheduled maintenance, repair, and inspection. These activities would be minimal and would be similar to those that occur throughout LADWP's service area under existing conditions. Activities associated with long-term operations and maintenance of the proposed project would be minimal. Therefore, the proposed project would not conflict with transportation plans and policies during operation. Impacts are therefore less than significant.

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 specific criteria (VMT), for determining the significance of transportation impacts. It is further divided into four subdivisions: (1) land use projects, (2) transportation projects, (3) qualitative analysis, and (4) methodology. The proposed project is a potable water pipeline project that would generate temporary construction-related traffic and nominal operations and maintenance traffic. This project would be categorized under subdivision (b)(3), qualitative analysis. Subdivision (b)(3) recognizes that lead agencies may not be able to quantitatively estimate VMT for every project type. In those circumstances, this subdivision encourages lead agencies to evaluate factors such as the availability of transit, proximity to other destinations, and other factors that may affect the amount of driving required by the project.

Per the updated CEQA thresholds for VMT, the City's minimum threshold for the analysis of land use project impacts is 250 or more daily trips. As described above, the proposed project would not develop a new (permanent) land use; but would temporarily generate 194 daily trips (234 daily PCE trips) during the peak construction period. Additionally, as the trip generation is less than 250 daily trips, the proposed project would not exceed the City's threshold.

As described previously, construction of the proposed project would result in a temporary increase in local traffic as a result of construction-related workforce traffic and material deliveries, and construction activities occurring within the public ROW during the 2-year construction period. The primary off-site impacts from the movement of construction trucks would include short-term and intermittent effects on traffic operations because of slower movements and larger turning radii of delivery and haul trucks compared to passenger vehicles. However, the majority of the proposed project is located close to major arterials and freeways, including Ventura Boulevard, State Route 170, and US 101, and travel on local streets would be minimized. Nevertheless, a summary of estimated construction VMT is provided in Table 3.17-4 below for the daily, peak construction period, and the total project construction.

Table 3.17-4. Vehicle Miles Traveled Summary

Trip Type	Distance (miles)[1]	Daily Trips	Daily VMT	Peak Construction Period Trips	Peak Construction Period VMT	Total Construction Trips	Total Construction VMT
Haul A[2]	5	6	30	431	2,155	713	3,563
Haul B[2]	14	2	28	144	2,016	238	3,325
Vendor	6.9	24	166	2,580	17,802	7,796	53,792
Worker	14.7	162	2,381	18,490	271,803	34,790	511,413
	Total	**194**	**2,605**	**21,645**	**293,776**	**43,537**	**572,093**

Source: Dudek 2019

1 Haul distances are approximate (5 miles to Upper Stone Canyon and 14 miles to the Sun Valley Landfill). Vendor and worker trip distances are used from CalEEMod default values.

2 It is assumed that the majority (80%) of haul trips will use the LADWP-owned Upper Stone Canyon, and the remaining 20% will use the Sun Valley Landfill.

Potential increases in vehicle trip generation as a result of project construction would vary based on the construction activity, location, equipment needs, and other factors. Additionally, as described above, the proposed project's trip generation of 194 daily trips (234 daily PCE trips) during the peak construction period would not exceed the City's threshold of 250 daily trips. However, once construction is completed, construction-related traffic would cease and VMT levels would return to pre-project conditions. Therefore, the proposed project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). Impacts would be less than significant.

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)?

Less Than Significant with Mitigation Incorporated. During construction, lane closures, roadway closures, detours, driveway blockages, loss of parking, and disruptions to traffic, transit, bicycle, and pedestrian movement would occur in and around proposed project construction. This may result in a potentially significant safety hazard to construction workers and/or the public; therefore, mitigation would be required. To minimize these potential safety hazards, mitigation measure MM-TRAF-1 would be implemented.

MM-TRAF-1: Construction Traffic Control Plan

Prior to the start of any construction-related work or encroachment, the Los Angeles Department of Water and Power (LADWP) shall develop and implement a Traffic Control Plan. The Traffic Control Plan shall include but will not be limited to the following measures:

- All construction activities shall be conducted in accordance with the Greenbook, traffic control plans designed by the City of Los Angeles Department of Transportation and LADWP, and the *Work Area Traffic Control Handbook Manual* to allow the least impacts to levels of service, traffic safety, and emergency access to the site during construction.
- LADWP shall install temporary equipment necessary for safe and efficient traffic control including changeable message signs, delineators, arrow boards, flagmen, etc.
- LADWP shall provide advance notification of the proposed construction work area limits and lane closure times to transit services and all local emergency service providers (police, fire, ambulance, etc.).
- Qualified flagmen shall be posted at each work site to direct construction traffic entering and exiting the site and/or to direct large construction-related vehicles to/from the work areas.
- Two-way travel shall always be provided along Coldwater Canyon Avenue throughout construction. Where two-way travel may not be possible along Oeste Avenue, LADWP shall provide an access plan for residents and emergency vehicles.
- The Traffic Control Plans shall also include detours and safe passage areas for bicyclists and pedestrians in the impacted work areas.

The construction of the proposed project would be conducted in accordance with the Greenbook, traffic control plans designed by LADOT/LADWP, and the Work Area Traffic Control Handbook (WATCH) Manual to allow acceptable LOS, traffic safety, and emergency access to the site during construction. With implementation of MM-TRAF-1, impacts related to hazards during construction would be reduced to less than significant levels. Once operational, the maintenance, repair, and inspections for the proposed project would be similar in nature to what is currently occurring for the existing pipelines in the project area. Therefore, no new impacts would occur. As such, impacts would be limited to the construction period and would be less than significant with mitigation incorporated.

d) Would the project result in inadequate emergency access?

Less Than Significant with Mitigation Incorporated. As previously discussed, construction vehicles would temporarily access the project site via Coldwater Canyon Avenue, Avenida Del Sol, Oeste Avenue, and other local roadways. The proposed project would have the potential to obstruct portions of these roadways during construction. However, incorporation of a Traffic Control Plan, as required by MM-TRAF-1, and associated traffic control plans and adherence to the Greenbook and WATCH Manual would ensure that any temporary impacts to emergency vehicle flow and/or ingress/egress to properties along the alignment are coordinated in advance with emergency service providers and law enforcement to ensure that provision of sufficient emergency service, access, and evacuation can occur during construction if necessary. Implementation of a Traffic Control Plan with applicable traffic control plans and adherence to the Greenbook and WATCH Manual would reduce impacts to emergency access to less than significant levels. Once operational, the proposed project would predominantly operate below ground and would not include any impediments to emergency access. Aboveground features, including the small appurtenant structures and the proposed flow control station, would be located within the public sidewalks and on a privately owned LADWP property, respectively. As such, aboveground structures would not result in impediments to emergency access. Additionally, vehicular trips for maintenance, repair, and inspection during operation of the pipeline would be minimal and would be similar in quantity and nature to those currently occurring in the area for other LADWP pipelines. Therefore, no new impacts to emergency access would occur during operation. As such, impacts would be limited to the construction period and would be less than significant with mitigation incorporated.

References

City of Los Angeles. 2015. Citywide General Plan Circulation System, Map A2 – Valley Subarea. December 2015. Accessed September 12, 2019. https://navigatela.lacity.org/common/mapgallery/pdf/planning/mobility/mobility_maps_A1_A9.pdf.

Metro (Los Angeles County Metropolitan Transportation Authority). 2010. *2010 Congestion Management Program for Los Angeles County*. Accessed September 12, 2019. http://www.metro.net/projects/congestion_mgmt_pgm/.

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 section 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 in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☒	☐
ii) A resource determined by the 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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 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 in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

Less Than Significant Impact. As described under Section 3.5 of this IS/MND, a California Historical Resources Information System records search and Sacred Lands File search was conducted for the project area. No tribal cultural resources were identified as a result of the records searches. Additionally, to date, no specific tribal cultural resources were identified by California Native American

tribes as part of LADWP's AB 52 notification and consultation process; however, consultation is still ongoing (see Section 3.18(a)(ii) below for a description of this process). Therefore, the proposed project would not adversely affect tribal cultural resources that are listed or eligible for listing in the state or local register. Impacts would be less than significant.

ii) A resource determined by the 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 Resource 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. There are no resources in the project area that have been determined by the lead agency to be significant pursuant to the criteria set forth in Public Resources Code Section 5024.1. Further, no specific tribal cultural resources were identified in the project area by the Native American Heritage Commission, by California Native American tribes, or by LADWP as part of the AB 52 notification and consultation process.

On October 16, 2019, LADWP sent notification of the proposed project to all California Native American tribal representatives that have requested project notifications from LADWP pursuant to AB 52 and that are on file with the Native American Heritage Commission as being traditionally or culturally affiliated with the geographic area. To date, two tribes have requested to consult on the project. Consultation is currently ongoing.

On January 10, 2020, LADWP consulted with Mr. Jairo Avila of the Fernandeno Tataviam Band of Mission Indians, pursuant to AB 52. Mr. Avila stated that the project area of potential effect has the potential for inadvertent discoveries. As a result, LADWP agreed to the procedure for inadvertent discovery of tribal cultural resources (TCRs), as outlined in MM-TCR-3.

Andrew Salas of the Gabrieleño Band of Mission Indians – Kizh Nation sent a letter stating that the proposed project may cause substantial adverse changes to tribal cultural resources, as the project area is within the Gabrieleño Band of Mission Indians – Kizh Nation's ancestral tribal territory. However, the letter did not identify any specific tribal cultural resources at or near the project area. On February 27, 2020, LADWP consulted with Mr. Salas, pursuant to AB 52. Mr. Salas stated that since the project is located within close proximity to the Los Angeles River and hillside areas south of the river, that he considered there to be a high potential for inadvertent discoveries during construction. As a result, LADWP agreed to Native American monitoring, as outlined in MM-TCR-2.

No other letters were received from California Native American tribes.

Due to the absence of previously recorded tribal cultural resources along the project alignment and because no specific tribal cultural resources have been identified by California Native American tribes through the AB 52 consultation process, LADWP has determined that no known tribal cultural resources are present in the project area. However, the correspondence from Mr. Salas suggests that there is some potential for unknown subsurface tribal cultural resources to be impacted by the project. In the event that unknown subsurface tribal cultural resources are uncovered during construction ground disturbance, and such resources are not identified and avoided or properly treated, a potentially significant impact could result. As such, mitigation measures MM-TCR-1, MM-TCR-2, and MM-TCR-3 have been set forth to protect tribal cultural resources, in the event that any are discovered during project construction. Upon implementation of MM-TCR-1, MM-TCR-2, and MM-TCR-3, impacts would be less than significant with mitigation incorporated.

MM-TCR-1: Worker Environmental Awareness Program Training

All construction workers shall undergo Worker Environmental Awareness Program (WEAP) training conducted by a qualified archaeologist to ensure that any unanticipated archaeological or tribal cultural discoveries are treated appropriately. The WEAP training will provide specific details on the kinds of archaeological and/or tribal cultural resources materials that may be identified during ground disturbing activities.

MM-TCR-2: Native American Monitoring

Tribal representatives who have participated in Native American consultation for the project shall be contacted prior to the start of construction activities to determine the appropriate Native American monitor(s), the phases and locations of project ground-disturbing activities that would involve monitoring, and the frequency and duration of monitoring throughout construction. Should any tribal cultural resources be encountered, the Native American monitor(s) will have the authority to request construction to cease within 60 feet of the discovery to assess and document potential finds as outlined in Mitigation Measure MM-TCR-3.

MM-TCR-3: Inadvertent Discovery of Tribal Cultural Resources

Should a potential tribal cultural resource be encountered, construction activities near the discovery shall be temporarily halted within 60 feet of the discovery. The Los Angeles Department of Water and Power (LADWP) along with the Native American monitor(s) shall discuss the significance of the discovery. If the potential resource is archaeological in nature, appropriate management requirements shall be implemented as outlined in Mitigation Measure MM-CUL-1. If the resource is determined to be a potential tribal cultural resource (as defined

by PRC, Section 21074), LADWP shall, in good faith, consult with the tribes who have participated in consultation under Assembly Bill 52 on the disposition and treatment of the resource. Depending on the nature of the resource and tribal recommendations, review by a qualified archaeologist may be required. Implementation of proposed recommendations will be made based on the determination of LADWP that the approach is reasonable and feasible and a good faith effort has been made to find agreement with consulting tribes. All activities shall be conducted in accordance with regulatory requirements.

References

None.

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 stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	☒
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
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?	☐	☐	☐	☒
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local	☐	☐	☒	☐

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
infrastructure, or otherwise impair the attainment of solid waste reduction goals?				
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

a) 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?

No Impact.

Existing Utilities

The proposed project would involve the replacement of a trunk line located within City streets. Other utilities, including street light conduit, other water pipelines, sewer lines, and gas lines are present underneath the roadways along the project alignment, and storm drains are present along the surface of the streets. As described in Section 2.3, construction would include utility clearance/mark out activities. Any subsurface utilities that fall within the proposed excavation areas would be supported and protected as excavation and shoring occurs. Gutters and storm drain inlets would be protected where necessary through compliance with stormwater BMPs, including measures outlined in the SWPPP. Where trenching activities are situated adjacent to existing utilities, manual excavation may be used to ensure that such utilities are not inadvertently damaged. In the event that existing underground utilities are damaged during construction of the proposed project, LADWP or its construction contractor would repair or replace the damaged utilities per the Greenbook and the corresponding Brown Book, which is the City of Los Angeles Department of Public Works' Standard Specifications for Public Works Construction. As such, existing utilities would be protected and maintained, or repaired and replaced if inadvertently damaged. The construction activities associated with supporting utilities during excavation or manually excavating around utilities are included as part of the project and, therefore, have been analyzed for their potential environmental effects in this IS/MND. As substantiated throughout this document, no significant, adverse environmental effects would occur as a result of the proposed project.

New/Expanded Facilities

Wastewater Facilities

The project would not involve long-term sanitary sewer discharges, as the project would not include permanent sources of wastewater. Non-stormwater discharges would be generated during construction (hydrostatic testing, pipeline disinfection, pipeline flushing, and trench dewatering). These discharges could potentially be made to the local municipal sewer system. However, such discharges would be temporary and periodic in nature and would comingle with wastewater in the municipal sewer collection system prior to being treated at a regional wastewater treatment plant. Prior to making such discharges, especially related to pipeline disinfection, LADWP would coordinate with the Los Angeles Department of Sanitation and Environment to ensure that the sewer conveyance system would not be unduly burdened with regard to either capacity or water quality (e.g., disinfection agents and/or by-products). LADWP would obtain a SCAR Permit from the Los Angeles Department of Sanitation and Environment, which would specify an approved maximum allowable discharge rate. LADWP would not release construction-related discharges to the sewer system at a rate that exceeds the specifications in the SCAR Permit. Adherence to those specifications would ensure that the sewer system and downstream wastewater treatment facilities are not unduly burdened and that existing capacities are not exceeded as a result of the project. As such, the proposed project would not require or result in the need for new wastewater facilities or expansion of existing facilities. No impact would occur.

Water Facilities

The proposed project would involve the replacement of segments of a water trunk line. As such, the project itself consists of constructing a new water facility. The environmental effects of constructing and operating the new pipeline, as well as the associated flow control station vault and Coldwater Canyon Pump Station improvements, are analyzed for their potential environmental effects throughout this IS/MND. As substantiated throughout this document, no significant, adverse environmental effects would occur as a result of the proposed project.

Proposed project construction would result in temporary increases in water use in the project area, since water would be required for dust control, concrete mixing, hydrostatic testing, and pipeline disinfection. However, the project's water needs would be limited to the construction period. Temporary, minor increases in water use in the project area would not result in the need for new or expanded water facilities. During operation, the new pipeline would operate predominantly below ground. The project would convey existing water sources and would not require new water treatment facilities. As such, operation of the project would not require or result in the need for new water facilities or expansion of existing facilities. No impact would occur.

Stormwater Drainage Facilities

Stormwater drainage facilities are provided throughout the project area. During construction, hydrostatic testing, pipeline disinfection, dewatering, and pipeline flushing could result in temporary increases in discharges to the stormwater drainage system. The hydrostatic test water, disinfectant water, extracted groundwater, and flushed water would either be discharged to the stormwater or sewer system. If this water is discharged to the storm drain system, the project could cause a temporary increase in runoff water entering the drainage systems in the project area. However, because dewatering, disinfection, flushing, and hydrostatic testing activities would be temporary and spread out along the project alignment, they would not result in a need for new or expanded stormwater drainage facilities. Once operational, the proposed project would be part of a closed water supply system and would not affect stormwater drainage facilities. Changes in impervious surface area would be limited to the proposed flow control station vault. This structure, which has a footprint of approximately 1,500 square feet, would not substantially increase runoff in the project area. For these reasons, the proposed project would not be anticipated to require, or indirectly result in, the construction of new stormwater drainage facilities or the expansion of existing facilities. No impact would occur.

Electric Power and Natural Gas Facilities

The proposed project would involve installation of a new water pipeline and would not involve habitable structures that would require new or expanded electric power and/or natural gas facilities. Additionally, operational activities associated with the proposed project would be minimal (no routine daily equipment operation or vehicle trips would be required). Once complete, the proposed project would require minimal amounts of power to operate the flow control station vault located on the LADWP property at 3380 Coldwater Canyon Avenue; however, the electric power required would not be notable. Additionally, the Coldwater Canyon Pump Station involves use of electricity to power some of the pumps. The proposed project would involve replacing the existing pumps with pumps that have slightly reduced horsepower ratings relative to the existing pumps. As such, the demand for electric power from the pump station would be expected to decrease under the proposed project. Therefore, no new or expanded electric power or natural gas facilities would be required, and no impacts would occur.

Telecommunications Facilities

The proposed project would involve installation of a new water pipeline and would not involve habitable structures that would require new or expanded telecommunications facilities. Furthermore, as explained in Section 3.14, the proposed project would not result in substantial population growth. As such, the project would not require new or expanded telecommunications facilities. Therefore, no impacts related to the need for new or expanded telecommunication facilities would occur.

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. A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers. LADWP provides potable water to the City, and the proposed project would be used to convey that water to portions of LADWP's service area. The LADWP 2015 Urban Water Management Plan provides normal year, single dry year, and multiple dry year supply-and-demand analysis for LADWP's domestic water service area. As shown in the Urban Water Management Plan, LADWP's supplies can meet demand for multiple dry years (LADWP 2015).

Water needs of the project during construction would be relatively minor and temporary. Water would be used for dust control, concrete mixing, hydrostatic testing, and pipeline disinfection. Water use during construction would be negligible relative to regional supplies and would be typical of similar water conveyance projects. Existing water resources are sufficient to meet those needs. Following construction, the proposed project would merely convey existing potable water sources and would not involve increases in the consumptive use of water. Therefore, impacts related to water supply 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?

No Impact. During construction, hydrostatic testing, pipeline disinfection, pipeline flushing, and dewatering could result in temporary increases in wastewater in the project area. As explained in Section 3.10(a), the hydrostatic test water, disinfectant water, flushing water, and extracted groundwater would either be discharged to the storm drain or sewer system. If this water is discharged to the sewer system, the project could cause a temporary increase in wastewater entering the sewer system in the project area. However, because these discharges would be temporary and would end once construction is complete, they would not adversely affect wastewater treatment capacity. During operation, the project would not generate wastewater. As such, the project would not result in a long-term demand for wastewater treatment services and no impacts to wastewater treatment capacity would occur.

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. The proposed project would be required to comply with all applicable local and state regulations related to solid waste. Construction associated with the proposed project would generate minor amounts of solid waste. Solid waste would primarily consist of soils and asphalt from the proposed construction activities. Once construction is complete, the project would not require solid waste disposal.

Per the California Green Building Standards Code, 65% of construction and demolition waste must be diverted from landfills. As such, at least 65% of all construction and demolition debris from the site would be diverted. Any hazardous wastes that are generated during construction activities would be managed and disposed of in compliance with all applicable federal, state, and local laws. At the local level, the City has a Citywide Construction and Demolition Waste Recycling Ordinance, which requires that all construction and demolition waste generated within City limits be taken to City-certified construction and demolition waste processors. All haulers and contractors responsible for handling construction and demolition waste must obtain a private waste hauler permit from the Los Angeles Department of Sanitation and Environment. LADWP and/or its construction contractor would be required to adhere to the requirements of the Citywide Construction and Demolition Waste Recycling Ordinance.

As described in Section 2.3 of this document, pavement that is removed from the project site would be recycled, reused as pavement base material, or transported to an appropriate facility for recycling or disposal. Soils would be hauled off site. During construction activities, approximately 7,600 cubic yards of excavated material would be removed and hauled away to the LADWP-owned Upper Stone Canyon or to the Sun Valley Landfill. The Sun Valley Landfill has a maximum daily capacity of 1,458 cubic yards per day and an expected cease operation date of 2026 (County of Los Angeles 2019; CalRecycle 2020). As such, the landfill that is expected to serve the project area is anticipated to have sufficient permitted capacity to accommodate the construction debris that would be generated by the proposed project and would be operational throughout the construction period. (The project's anticipated daily construction waste generation would be approximately 1% of the landfill's maximum daily capacity.) Additionally, some of the project's construction waste would be brought to Upper Stone Canyon, which would reduce the amount of waste taken to Sun Valley Landfill. As such, the amount of debris generated during construction is anticipated to be minimal and is anticipated to be accommodated by landfills in the area.

For these reasons, the proposed project would not generate waste in excess of state or local standards or in excess of the capacity of local infrastructure and would not impair the attainment of solid waste reduction goals. Impacts would be less than significant.

Operation of the proposed project would not generate solid waste. For these reasons, impacts related to solid waste and landfill capacity would be less than significant.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. As described under Section 3.19(d), the proposed project would comply with the City's Citywide Construction and Demolition Waste Recycling Ordinance as well as state requirements for construction and demolition waste. In addition to the California Green Building Standards Code's requirements

for recycling construction and demolition waste, the state has set a goal of 75% recycling, composting, and source reduction of solid waste by 2020. To help reach this goal, the state has adopted AB 341 and AB 1826. AB 341 is a mandatory commercial recycling bill, and AB 1826 is mandatory organic recycling. Waste generated by the proposed project would enter the City's waste stream but would not adversely affect the City's ability to meet AB 341 or AB 1826, since the proposed project's waste generation would be limited to the temporary construction period and would represent a nominal percentage of the waste created within the City. Once construction is complete, the proposed project would not generate solid waste. Therefore, impacts related to compliance with solid waste regulations would be less than significant.

References

CalRecycle. 2020. "Facility Detail: Sun Valley Landfill (19-AR-1160)." Accessed January 16, 2020. https://www2.calrecycle.ca.gov/swfacilities/Directory/19-AR-1160.

County of Los Angeles. 2019. *Countywide Integrated Waste Management Plan – 2018 Annual Report*. December 2019. Accessed January 16, 2020. https://pw.lacounty.gov/epd/swims/ShowDoc.aspx?id=6530&hp=yes&type=PDF.

LADWP (Los Angeles Department of Water and Power). 2015. *Urban Water Management Plan*. Accessed September 4, 2019. https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-w-sos-uwmp;jsessionid=mnqTcZSfh23hpXGvjFtjSnxWcRTBxCGJwQngqjyzh6HlLs2ZLxwR!-1131025128?_afrLoop=297912534597770&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D297912534597770%26_afrWindowMode%3D0%26_adf.ctrl-state%3D141m96d0e6_4.

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?	☐	☒	☐	☐
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?	☐	☐	☒	☐

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
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

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

Less Than Significant with Mitigation Incorporated. The proposed project would be located in a generally urbanized environment, which diminishes the potential for the spread of wildland fire. Specifically, the proposed Unit 5, Phase II alignment portion of the project area is generally surrounded by multi-family residential and small segments of strip commercial and civic land uses. This portion of the project traverses the channelized Los Angeles River. The proposed Unit 6 alignment of the project area generally traverses through single-family residential land uses. There is open space located to the east (Wilacre Park) and the west (Coldwater Canyon Open Space) of the residential land.

As explained in Section 3.9(f), the LADPW designates disaster routes, which would be used for evacuation in the case of a wildfire, or other disaster, in the vicinity of the project alignment. Ventura Boulevard and Ventura Freeway (US 101) are designated disaster routes (County of Los Angeles 2012). US 101 is north of the project site, and is therefore not expected to be impacted by project construction activities. Ventura Boulevard crosses the project alignment at Coldwater Canyon Avenue. Lane closures may be required for work along Coldwater Canyon Avenue. However, closures would be limited to a single lane. As such, these roadways could continue to function as disaster routes during project construction, if necessary. Additionally, traffic control plans would be submitted to LADOT for review and approval before construction would begin. Alternate evacuation routes, as required, would be designated at that time.

As further explained in Section 3.17, incorporation of a Traffic Control Plan, as required by MM-TRAF-1, would ensure that any temporary impacts to emergency vehicle flow and/or ingress/egress to properties along the alignment are coordinated in advance with emergency service providers and law enforcement to ensure that provision of sufficient emergency service, access, and evacuation can occur during construction if necessary. Implementation of MM-TRAF-1 would reduce impacts to local emergency service providers to less than significant levels. At the end of construction, the new trunk line would be located underground. Minor appurtenant structures would protrude above grade near the alignment; however, these structures would be small and would not obstruct emergency response or evacuation. Similarly, the proposed flow control station located at 3380 Coldwater Canyon Avenue would be located on private property owned by the LADWP and would not obstruct emergency response or evacuation. The City's Local Hazard Mitigation Plan would proceed and be implemented with or without the proposed project. Impacts to emergency access and plans would be less than significant after incorporation of MM-TRAF-1.

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?

Less Than Significant Impact. The project alignment is predominantly located underground, with the exception of small appurtenant structures, a proposed flow control station, and interior improvements to the existing Coldwater Canyon Pump Station. Additionally, a small segment of the existing pipeline hangs underneath the Coldwater Canyon Avenue bridge where it crosses the Los Angeles River. The project work area is generally urbanized and traverses through surrounding residential and commercial land uses; however, a majority of the project alignment is located within a VHFHSZ in an area that is characterized by gently sloping terrain (City of Los Angeles 2019). As such, portions of the project alignment would be located within an area susceptible to wildfire hazards, including pollutant concentrations from a wildfire and the uncontrolled spread of a wildfire.

There are two open space areas located in the general vicinity of the proposed Unit 6 alignment, namely Coldwater Canyon Open Space area (to the west) and Wilacre Park (to the east). However, while the project is in the vicinity of these potential fire hazard areas, the proposed project is not expected to exacerbate the potential for wildfires to occur, expose project occupants to pollutant concentrations from a wildfire, or the uncontrolled spread of a wildfire. Construction activities in each proposed project work area would be temporary and short-term in nature and would occur within existing roadways that are surrounded by urban development. Project-specific construction activities would not include any activities that are commonly associated with a high risk of fire ignition. Due to the location of the proposed project within a generally urbanized area, proposed project construction is unlikely to expose workers to increased risk of wildfire hazards.

The proposed project would include the replacement of a trunk line, which would not introduce any habitable structures to the area that could expose occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Operation of the new trunk line would occur predominantly below ground, with the exception of the portion of the alignment that hangs underneath the Coldwater Canyon Avenue bridge over the Los Angeles River, the aboveground appurtenant structures, proposed flow control station, and interior improvements to the existing Coldwater Canyon Pump Station. As such, the proposed project would not result in a notable change to the environment (including environmental fire hazards) when compared to existing conditions. The proposed project would not require permanent on-site workers. As such, construction and operation of the proposed project is not anticipated to result in the exposure of any people or structures to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Therefore, impacts would be less than significant.

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?

Less Than Significant Impact. The proposed project would involve the repair and replacement of segments of an existing potable water trunk line. The proposed project would be located in an existing neighborhood. Construction work would be limited to existing paved roadways that are surrounded predominantly by commercial and residential development. As explained above in 3.20(b), the proposed project alignment is located within a VHFHSZ in an area that is characterized by gently sloping terrain (City of Los Angeles 2019). As such, portions of the project would be located within an area susceptible to wildfire hazards. However, construction activities associated with the proposed project would be unlikely to exacerbate fire risks. Construction activities in each proposed project work area would be temporary and short-term in nature and would generally occur within existing roadways that are surrounded by urban development. Project-specific construction activities would not include any activities that are commonly associated with a high risk of fire ignition.

The proposed project would include the replacement of a trunk line and would not introduce 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. Operation of the new trunk line would occur predominantly below ground, with the exception of the portion of the alignment that hangs underneath the Coldwater Canyon Avenue bridge over the Los Angeles River, the aboveground appurtenant structures, proposed flow control station, and interior improvements to the existing Coldwater Canyon Pump Station. As such, the proposed project would not result in a notable change to the environment (including environmental fire hazards) when compared to existing conditions. The proposed project would not require permanent on-site workers and maintenance activities would be routine and similar in nature when compared to those carried out by LADWP under

existing conditions. As such, construction and operation of the proposed project would not 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. Impacts would be less than significant.

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?

Less Than Significant Impact. The proposed project would include the replacement and repair of an existing potable water trunk line. While additional workers would be temporarily present in the project area during construction, they would not be subject to undue risks associated with flooding or landslides, relative to other areas in the City or region and when compared to existing conditions. As explained in Section 3.7(a)(iv), the project is not likely to increase or exacerbate the potential for landslides to occur (CGS 2015). As explained above, the project site is located in an urban neighborhood and, although within a VHFHSZ, would not include any components that would exacerbate the likelihood for the spread of wildfire. As such, the potential for post-fire slope instability resulting in landslides or flooding within the project area is low. As explained in Section 3.10, the proposed project would not result in permanent drainage changes or significant runoff with the potential to cause or exacerbate flooding or landslides. As explained in Section 3.20(b), the proposed project would not increase the risk of fire in the area. While the proposed project alignment is located within a VHFHSZ, the project alignment is located within a generally urbanized area, which can help precludes the spread of wildland fire. Operation of the new trunk line would occur predominantly below ground, with the exception of the portion of the alignment that hangs underneath the Coldwater Canyon Avenue bridge over the Los Angeles River, the aboveground appurtenant structures, proposed flow control station, and interior improvements to the Coldwater Canyon Pump Station. As such, the proposed project would not result in a notable change to the environment (including environmental fire hazards) when compared to existing conditions. For these reasons, the proposed project would not 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. Impacts would be less than significant.

References

CGS (California Geological Survey). 2015. CGS Information Warehouse: Landslides. Accessed September 16, 2019. https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=landslides.

City of Los Angeles. 2019. Earth Layer – Fire Hazard Responsibility Areas. Los Angeles GeoHub. 2019. Accessed September 4, 2019. http://geohub.lacity.org/datasets/56935c2fb7d84455adba0c414f0ebe34_1?geometry=-121.736%2C33.736%2C-115.202%2C34.531.

3.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially 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, substantially 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?	☐	☒	☐	☐
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)?	☐	☒	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

a) Does the project have the potential to substantially 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, substantially 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. The proposed project would not degrade the quality of the environment, as the proposed project would be placed predominantly below ground, under existing streets and public rights-of-way. MM-BIO-1 and MM-BIO-2 would ensure that any potential impacts to biological resources, including impacts to nesting birds and protected trees, would be less than significant.

The project would involve excavation and grading activities, which could potentially unearth previously unknown buried cultural resources. Such actions could unearth, expose, or disturb subsurface paleontological, archaeological, historical, or Native American resources that were not observable on the ground surface. However, with the incorporation of MM-GEO-1, MM-CUL-1, MM-CUL-2, MM-TCR-1, MM-TCR-2, and MM-TCR-3, potential impacts to cultural resources that represent major periods of California history or prehistory would be less than significant. As such, impacts would be less than significant with mitigation incorporated.

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 discussed in the respective issue areas, the proposed project would not result in any significant, unmitigable effects to environmental resources. The implementation of the identified project-specific mitigation measures and compliance with applicable codes, ordinances, laws, and other required regulations would reduce the magnitude of any impacts associated with proposed project construction activities to a level of less than significant. For the reasons further set forth below, impacts would not be cumulatively considerable.

Related projects with the potential to contribute to cumulative impacts would be those projects occurring concurrent with and in proximity to the proposed project. Such projects, as may be determined at this level of planning, would be other linear utility projects being undertaken by LADWP in the proposed project area at the time of construction activities and would also include development projects in the area that would create similar construction effects. The impacts of these projects, as well as those of the proposed project (as discussed above), would be temporary in nature, and would generally be limited to the area in which construction activities are occurring. Given that related linear utility projects would be coordinated by LADWP, it can be anticipated that LADWP would initiate construction of these related projects in a manner such that construction activities associated with different projects would occur either at different times or at sufficient distance from one another, avoiding cumulative effects relative to air quality, noise, and traffic.

With regard to air quality, the SCAQMD has established incremental emissions thresholds to determine whether a project will contribute to significant impacts. Because the proposed project would contribute emissions at rates well below SCAQMD significance thresholds, and given the aforementioned assumption that related LADWP projects would be coordinated as to avoid cumulative impacts, it is anticipated that the air quality impacts of the proposed project and other related projects would not be cumulatively considerable.

Noise impacts, similar to those related to air quality, would be dependent on the timing and location of related project construction in conjunction with the construction of the proposed project. As such, assuming that LADWP would phase such projects to avoid, to the extent feasible, concurrent construction of linear utilities in any one location, it can be concluded that noise impacts of the proposed project and related projects would not result in noise impacts that are cumulatively considerable. As explained in Section 3.13 of this IS/MND, noise from project construction would be greatest at the properties immediately adjacent to the project alignment. As such, cumulative projects with the potential to combine with the noise effects of the proposed project would generally be limited to those located along the project alignment. The possibility of proposed project construction coinciding with construction of this project is unlikely. In the event that construction were to coincide, the overlap would be brief, since proposed project construction would not generally remain in a single location for more than a few days. The transitory nature of this project's construction process would limit the potential for cumulative noise effects to occur from stationary development projects (e.g., a development of a multi-family building). Furthermore, implementation of MM-NOI-1 would limit noise produced by the proposed project to the extent practicable, and implementation of MM-NOI-2 would ensure that local residents are informed of the construction schedule, duration, and progress. Additionally, other development projects in the project area have been or would be subject to environmental review pursuant to state law. If potentially significant noise impacts are identified, appropriate mitigation would be applied to the related projects. The combination of the transitory nature of this project, implementation of project-specific mitigation, and regulatory and/or project-specific requirements that would be applied to related projects would ensure that cumulatively significant noise impacts would be less than significant with mitigation incorporated.

With regard to traffic, construction activities would generate truck traffic and vehicular traffic associated with construction workers. Construction activities would also result in lane closures and/or block closures along affected streets. Project-level impacts resulting from the proposed project's construction traffic would be temporary and less than significant with the implementation of MM-TRAF-1. Traffic impacts of the proposed project, in conjunction with those of related projects, would be minimized by coordination with LADOT, which is required to maintain proper levels of service and the overall function of the City's transportation network. Given that all related projects are subject to review by LADOT (when traffic system components or function are affected), LADOT would require that LADWP coordinate the proposed project such that the traffic system and levels of service in any one area are maintained to the extent feasible. Coordination with LADOT in conjunction with implementation of MM-TRAF-1 would preclude the possibility of cumulative traffic impacts resulting from the proposed project and related project construction activities. Based on the above, the cumulative traffic effects of the proposed project would be less than significant with mitigation incorporated.

In summary, the proposed project's cumulative impacts would be less than significant with mitigation incorporated.

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

Less Than Significant with Mitigation Incorporated. Implementation of the proposed project would not result in any impacts that are significant and unavoidable or cumulatively considerable. The implementation of the mitigation measures set forth herein would reduce all potential impacts to less-than-significant levels. Implementation of the proposed project would improve capacity, reliability, and flexibility in the water system and would complete the LADWP's six-phase plan to connect the Los Angeles Aqueduct Filtration Plant to the Franklin Reservoir. Therefore, upon implementation of the mitigation measures identified in this IS/MND, the proposed project would not result in impacts that would cause substantial adverse effects on human beings, either directly or indirectly. Therefore, impacts would be less than significant with mitigation incorporated.

References

None.

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4 REPORT PREPARERS

Lead Agency

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

Contributors

Christopher Lopez, Environmental Project Manager
Miguel Campos, Trunk Line Design Engineer
John Conti, Civil/Structural Design Engineer
Cuong Nguyen, Civil/Structural Design Engineer
Christopher Heron, Engineering Geologist

Technical Assistance Provided By

Dudek
38 North Marengo Avenue
Pasadena, California 91101

Contributors

Eric Wilson, Project Director
Tamseel Mir, Project Manager
Michele Webb, Lead Environmental Analyst
Nicholas Lorenzen, Air Quality Specialist
Michael Cady, Senior Biologist
Samantha Murray, MA, RPA, Cultural Resources Specialist/Architectural Historian
Sarah Corder, Senior Architectural Historian
Linda Kry, Archaeologist
Adrienne Dorrler, Associate Archaeologist
Perry Russel, P.G., Certified Engineering Geologist (#1837)
Ryan Munnikhuis, Environmental Technical Analyst
Glenna McMahon, PE, CEM, Hydrogeology Principal Engineer
Audrey Herschberger, PE, Environmental Engineer
Mike Green, INCE, Senior Noise Specialist

Dennis Pascua, Transportation Services Manager
Sabita Tewani, AICP, Transportation Planner
Amanda Meroux, EIT, Transportation Analyst
Chris Starbird, GIS Specialist

5 RESPONSE TO COMMENTS RECEIVED

This section includes a copy of each comment letter provided during the public review period of the IS/MND. The comment letters received have each been assigned a number (e.g., 1, 2, 3). The issues within each comment letter are bracketed and numbered (e.g., 1-1, 1-2). Comment letters are followed by responses, which are numbered to correspond with the bracketed comments. The comment letters and emails that were received by LADWP are listed in Table 5-1.

LADWP's responses to comments on the IS/MND represent a good-faith, reasoned effort to address the environmental issues identified by the comments. Pursuant to CEQA Guidelines Section 15074(b), decision makers will consider the proposed IS/MND together with the comments received during the public review process.

Table 5-1. Index of Commenters on the Initial Study/Mitigated Negative Declaration

Comment Letter	Date of Letter	Commenter	Response Nos.
1	May 14, 2020	California Department of Transportation District 7 *Signed: Miya Edmonson, IGR/CEQA Branch Chief*	1-1 & 1-2
2	May 18, 2020	Los Angeles County Metropolitan Transportation Authority *Signed: Shine Ling, AICP - Manager, Transit Oriented Communities*	2-1 through 2-3
3	May 15, 2020	State of California Department of Fish and Wildlife Service *Signed: Erinn Wilson*	3-1 through 3-6
4	May 14, 2020	Gabrieleno Band of Mission Indians-Kizh Nation	4-1
5	May 11, 2020	Legacy Entertainment *Signed: Count Steven Moore, CEO*	5-1 through 5-3
6	May 14, 2020	Nancy Smith	6-1 through 6-7
7	May 8, 2020	Jennifer	7-1
8	May 14, 2020	Richard C. Carson and Karlyn Kuper Carson	8-1 through 8-8
9	April 21, 2020	Evan Kransdorf	9-1
10	May 19, 2020	State Clearinghouse and Planning Unit, Governor's Office of Planning and Research	10-1
11	May 21, 2020	County of Los Angeles Fire Department *Signed: Ronald M. Durbin, Chief, Forestry Division Prevention Services Bureau*	11-1 through 11-4

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Comment Letter 1

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY Gavin Newsom, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7 – Office of Regional Planning
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-9140
FAX (213) 897-1337
TTY 711
www.dot.ca.gov

Making Conservation a California Way of Life.

May 14, 2020

James R. Howe
Los Angeles Department of Water and Power
111 North Hope Street, Room 1044
Los Angeles, CA 90012

RE: City Trunk Line South Unit 5 Phase II and Unit 6 Project – Mitigated Negative Declaration (MND)
SCH # 2020040184
GTS # 07-LA-2020-03237
Vic. LA-101/PM: 13.735 – 13.89

Dear James R. Howe:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for this Mitigated Negative Declaration (MND). The proposed project would include the replacement of the existing large-diameter potable water trunk line using the open trench and the pipe jacking methods. The proposed project would also include the installation of a flow control station, the structural relining of portions of the existing pipeline, and interior improvements within the existing Coldwater Canyon Pump Station. 1-1

After reviewing the MND, Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities.

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods. 1-2

If you have any questions, please contact Reece Allen, the project coordinator, at reece.allen@dot.ca.gov, and refer to GTS # 07-LA-2020-03237

Sincerely,

Miya Edmonson

MIYA EDMONSON
IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

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Response to Comment Letter 1

Miya Edmonson, IGR/CEQA Branch Chief
California Department of Transportation
May 14, 2020

1-1 This comment provides a synopsis of the proposed project from the IS/MND and does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the IS/MND. The comment also states that the California Department of Transportation (Caltrans) does not expect project approval to result in a direct adverse impact to existing State transportation facilities. No further response is necessary.

1-2 Any oversized transport vehicles used during construction would be subject to applicable Caltrans requirements. Any required permits would be obtained by LADWP, its construction contractor, or equipment owners who are responsible for transporting the equipment. Truck trips would be scheduled for off-peak commute periods to the extent practicable.

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Comment Letter 2

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

Metro

May 18, 2020

Mr. James R. Howe
City of Los Angeles Department of Water and Power (LADWP)
111 North Hope Street, Room 1044
Los Angeles, CA 90012
Sent by Email: james.howe@ladwp.com

RE: City Trunk Line South Unit 5 Phase II and Unit 6 Project
Mitigated Negative Declaration (MND)

Dear Mr. Howe:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed City Trunk Line South Project (Project) in the City of Los Angeles (City). Per Metro's area of statutory responsibility pursuant to sections 15082(b) and 15086(a) of the Guidelines for Implementation of the California Environmental Quality Act (CEQA: Cal. Code of Regulations, Title 14, Ch. 3), the purpose of this letter is to provide the City with specific detail on the scope and content of environmental information that should be included in the Mitigated Negative Declaration (MND) for the Project. In particular, this letter outlines topics regarding the Project's potential impacts on the Metro bus facilities and services which should be analyzed in the MND, and provides recommendations for mitigation measures and project design features as appropriate. Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA.[1] 2-1

Project Description
The Project is located in the Studio City neighborhood. The Unit 5, Phase II alignment of the proposed project would be located within the Coldwater Canyon Avenue public right-of-way and runs south for approximately 1,500 feet from immediately north of Ventura Boulevard, across the Los Angeles River, to terminate at the intersection of Coldwater Canyon Avenue and Dickens Street. Additionally, Unit 5 Phase II of the City Trunk Line South Project would include an additional 20-foot segment, located north of Moorpark Street where a new tie-in connection would connect the existing 64-inch City Trunk Line to the existing 54-inch trunk line.

Comments

Bus Service Adjacency

1. Service: Metro Bus Line 167 operates on Coldwater Canyon Avenue within the Unit 5, Phase II alignment. There is one Metro bus stop on Coldwater Canyon. Additionally, Metro Bus Lines 750, 150, and 240 service Ventura Boulevard, intersecting Coldwater Canyon Avenue. 2-2

[1] See CEQA Guidelines section 15064.3(a); Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts In CEQA, December 2018, p. 19.

City Trunk Line South
Mitigated Negative Declaration – Metro Comments
May 18, 2020

2. Impact Analysis: The MND should analyze potential effects on Metro Bus service and identify mitigation measures or project design features as appropriate. Potential impacts may include impacts to transportation services, stops, and temporary or permanent bus service rerouting. Specific types of impacts and recommended mitigation measures to address them include, without limitation, the following:

    a. Bus Operations Coordination: LADWP shall coordinate with Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro's Stops and Zones Department at 213-922-5190 not later than 30 days before the start of Project construction. Other municipal bus services may also be impacted and shall be included in construction outreach efforts.

    b. Bus Stop Condition: During construction, LADWP may either maintain the stop in its current condition and location, or temporarily relocate the stops consistent with the needs of Metro Bus operations. Temporary or permanent modifications to any bus stop as part of the Project, including any surrounding sidewalk area, must be Americans with Disabilities Act (ADA)-compliant and allow passengers with disabilities a clear path of travel between the bus stop and the Project. Once the Project is completed, LADWP must ensure any existing Metro bus stop affected by the Project is returned to its pre-Project location and condition, unless otherwise directed by Metro.

2-3

If you have any questions regarding this letter, please contact me by phone at 213-922-2671, by email at DevReview@metro.net, or by mail at the following address:

Metro Development Review
One Gateway Plaza
MS 99-22-1
Los Angeles, CA 90012-2952

Sincerely

Shine Ling, AICP
Manager, Transit Oriented Communities

Page 2 of 2

Response to Comment Letter 2

Shine Ling, AICP, Manager, Transit Oriented Communities
Los Angeles County Metropolitan Transportation Authority
May 18, 2020

2-1 LADWP acknowledges the comment as an introduction to comments that follow. This comment states that the purpose of the letter is to outline recommendations from the Los Angeles County Metropolitan Transportation Authority (Metro) concerning issues related to Metro bus facilities and services that may be affected by the proposed project. LADWP acknowledges the project's proximity to Metro bus facilities. The comment also provides a synopsis of the proposed project and project location from the IS/MND.

2-2 This comment lists the Metro bus lines that operate in the project vicinity. Metro Bus Line 167 operates on Coldwater Canyon Avenue within the proposed Unit 5 Phase II alignment. Metro Bus Lines 750, 150, and 240 service Ventura Boulevard, intersecting Coldwater Canyon Avenue. Section 3.17 of the IS/MND characterizes transit services in the project area, including the Metro bus lines listed in this comment. This comment does not raise a specific concern or question regarding the adequacy of the environmental impact analysis in the IS/MND; no further response is necessary.

2-3 The comment requests that LADWP contact the Metro Bus Operations Control Special Events Coordinator and Metro's Stops and Zones Department at least 30 days prior to construction. The comment also notes that other municipal buses may provide service in the project area and should be consulted and included in the construction outreach efforts.

The comment further states that during project construction, LADWP can either maintain bus stops along the alignment in their current condition and location or temporarily relocate the stops consistent with the needs of Metro bus operations. Additionally, any temporary or permanent modifications to bus stops and surrounding sidewalk areas must be American Disabilities Act–compliant and must allow passengers with disabilities a clear path of travel to the bus stop. The comment states that LADWP must ensure that after project completion, any existing Metro bus stop affected by the proposed project is returned to its pre-project location and condition, unless otherwise directed by Metro.

LADWP acknowledges that Metro bus stops are located in the project area. Bus stops along the alignment are not proposed for removal as part of project construction. The Draft IS/MND sets forth a mitigation measure for transportation impacts (MM-TRAF-1) that includes a requirement to provide advance notification of the proposed construction work area limits and lane closure times to transit services. In the event that construction would result in temporary disturbances to the use of bus stops, LADWP would coordinate with Metro to maintain or relocate the affected stops. Upon completion of construction, the proposed project would not

affect operation of or access to transit services, including Metro bus stops. LADWP would alert the identified Metro departments prior to construction and would coordinate with Metro as needed prior to and during construction. No comments or concerns regarding other transit services have been provided to date. However, LADWP would coordinate with any other transit providers that would be potentially affected by construction as necessary.

Comment Letter 3

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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 82123
(858) 467-4201
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

May 15, 2020

Mr. James Howe
Los Angeles Department of Water of Power
111 North Hope Street, Room 1044
Los Angeles, CA 90012
James.Howe@ladwp.com

Subject: Mitigated Negative Declaration for the City Trunk Line South Unit 5 Phase II and Unit 6 Project, City of Los Angeles, Los Angeles County

Dear Mr. Howe:

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced Mitigated Negative Declaration (MND) for the City Trunk Line South Unit 5 Phase II and Unit 6 Project (Project) provided by Los Angeles Department of Water and Power (LADWP). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources, and holds those resources in trust by statute for all the people of the State [Fish & Game Code, §§ 711.7, subdivision (a) & 1802; Public Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Public Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & Game Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by state law, of any species protected under the California Endangered Species Act (CESA) (Fish & Game Code, § 2050 et seq.), or State-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & Game Code, § 1900 et seq.) authorization as provided by the applicable Fish and Game Code will be required.

3-1

Project Description and Summary

Objective: LADWP is proposing the replacement of Unit 5, Phase II and Unit 6 of the City Trunk Line South Project in the Studio City neighborhood of the City of Los Angeles, County of Los Angeles. Implementation of the proposed Project would improve capacity, reliability, and flexibility in the water system, and would complete the LADWP's six-phase plan to replace the existing Los Angeles City Trunk Line, which connects the Los Angeles Aqueduct Filtration Plant to the Franklin Reservoir. The proposed Project would include the replacement of the existing large-diameter potable water trunk line using the open trench and the pipe jacking methods. The proposed Project would also include the installation of a flow control station, the structural relining of portions of the existing pipeline, and interior improvements within the existing Coldwater Canyon Pump Station.

Components of the proposed Project are described, as follows:

City Trunk Line South: Unit 5, Phase II

- The installation of 20 linear feet of 64-inch welded steel pipe (WSP) for the tie-in connection within the Coldwater Canyon Avenue public right-of-way (ROW), north of Moorpark Street, using the open trench method.
- The installation of 620 linear feet of 60-inch WSP within Coldwater Canyon Avenue starting at Ventura Boulevard and ending at Valleyheart Drive South, using the pipe jacking method.
- The structural relining with carbon fiber reinforced polymer (CFRP) of 175 linear feet of the existing 62-inch riveted steel pipe where Coldwater Canyon Avenue crosses the Los Angeles River.
- The installation of 50 linear feet of 60-inch WSP for the tie-in connections within Coldwater Canyon Avenue at Dickens Street, using the open trench method.

City Trunk Line South: Unit 6

- The installation of 60 linear feet of 60-inch WSP for the tie-in connection to the southerly terminus of the City Trunk Line South, Unit 5, Phase I, in Coldwater Canyon Avenue, using the open trench method.
- The removal and replacement of the existing Flow Control Station within Oeste Avenue with 200 linear feet of 60-inch WSP, using the open trench method.
- The structural relining with CFRP of 675 linear feet of 60-inch WSP; 334 linear feet of 51-inch WSP; and, 688 linear feet of 62-inch riveted steel pipe.
- The installation of an approximately 43.5 x 34 x 23-foot, flow control station vault on the LADWP owned property, located at 3380 Coldwater Canyon Avenue, Studio City.
- Interior improvements within the existing Coldwater Canyon Pump Station (located along Oeste Avenue), consisting of the removal of four existing pump units, installation of four new pump units, replacement of valves within the pump station, and replacement of piping to accommodate the new pumps.
- The proposed Project would connect the new, large-diameter water trunk line segments to the previously implemented City Trunk Line South Unit 5, Phase 1 Project, which was completed in March 2016. Implementation of the proposed Project would improve capacity, reliability, and flexibility in the water system, and would complete the LADWP's six-phase plan to connect the Los Angeles Aqueduct Filtration Plant to the Franklin Reservoir.

Location: The proposed Project would be located in the Studio City neighborhood in the City of Los Angeles, in the southeastern portion of the San Fernando Valley, approximately 15 miles

3-2

northwest of Downtown Los Angeles. The Unit 5, Phase II alignment of the proposed Project would be located within the Coldwater Canyon Avenue public right-of-way and runs south for approximately 1,500 feet from immediately north of Ventura Boulevard, across the Los Angeles River, to terminate at the intersection of Coldwater Canyon Avenue and Dickens Street. Additionally, Unit 5 Phase II of the Project would include an additional 20-foot segment, located north of Moorpark Street where a new tie-in connection would connect the existing 64-inch City Trunk Line to the existing 54-inch trunk line.

3-2 Cont.

The Unit 6 alignment would begin approximately ½ mile south of the Unit 5, Phase II alignment, and would run south within the public right-of-way of Coldwater Canyon Avenue, Avenida Del Sol and Oeste Avenue before terminating at the LADWP-owned property, located at 3380 Coldwater Canyon Boulevard.

Comments and Recommendations

CDFW offers the comments and recommendations below to assist LADWP in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. CDFW recommends the measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project's CEQA mitigation, monitoring, and reporting program (Public Resources Code, § 21081.6 and CEQA Guidelines, § 15097).

Project Description and Related Impact Shortcoming

Comment #1: Impacts to Sensitive Vegetation Communities

Issue: The Project IS/MND states that "five southern California black walnut and three coast live oak may need to be removed within the LADWP-owned property located at 3380 Coldwater Canyon Avenue and along Oeste Avenue." The IS/MND includes mitigation measure MM-BIO-2 addressing tree replacement but may be inadequate compared to the recommended mitigation measures of CDFW.

3-3

- MM-BIO-2 recommends "a minimum of 32 (20 southern California black walnuts and 12 coast live oak) 15-gallon-size protected trees of like species are required to be planted by the Los Angeles Department of Water and Power (LADWP)."
- MM-BIO-2 recommends that "all tree plantings will be subject to a five-year monitoring effort".

The City of Los Angeles' Tree Ordinance requires that a "protected tree be replaced within the property by at least two trees of a protected variety" but does not account for the acreage of habitat lost. The IS describes Disturbed California Walnut Woodland as a vegetation classification found on the Project site. CDFW considers all subcategories of California walnut grove (*Juglans californica*) as a sensitive natural vegetation community and classified by California Native Plant Society with a rarity ranking of S3.2.

Specific impact: CDFW considers plant communities, alliances, and associations with a statewide ranking of S1, S2, S3 and S4 as sensitive and declining at the local and regional level (Sawyer et al. 2008). An S3 ranking indicates there are 21-80 occurrences of this community in existence in California, S2 has 6-20 occurrences, and S1 has less than 6 occurrences. The Project may have direct or indirect effects to these sensitive species.

Why impact would occur: Project implementation includes grading, vegetation clearing for construction, road maintenance, and other activities that may result in direct mortality, population declines, or local extirpation of sensitive plant species. Misidentification or misclassification of tree species and/or their vegetation community would contribute to the degradation of natural open space or riparian habitats found within the City limits. CDFW is concerned that by not requiring all native trees and plants be replaced by similar native tree and plant species, the function and value of the impacted native tree species would not be mitigating to below a level of significance. . 3-4

Evidence impact would be significant: Impacts to special status plant species should be considered significant under CEQA unless they are clearly mitigated below a level of significance. Inadequate avoidance, minimization, and mitigation measures for impacts to these sensitive plant species will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative 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 CDFW or USFWS. 3-5

Correct mapping of recognized vegetation alliances is vital to disclose actual acreage-based impacts to these tree-dominated vegetation community, as well as ensure they are adequately mitigated. Including the scientific names for alliances as well as a thorough description of the membership requirements of each alliance would be helpful for validating the assessment completed.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: CDFW recommends conducting focused surveys for sensitive/rare plants on-site and disclosing the results in the IS. Based on the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW, 2018) (https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959), a qualified biologist should "conduct surveys in the field at the time of year when species are both evident and identifiable. Usually this is during flowering or fruiting." The final CEQA documentation should provide a thorough discussion on the presence/absence of sensitive plants on-site and identify measures to protect sensitive plant communities from Project-related direct and indirect impacts. 3-6

Mitigation Measure #2: In 2007, the State Legislature required CDFW to develop and maintain a vegetation mapping standard for the state (Fish & Game Code, § 1940). This standard complies with the National Vegetation Classification System, which utilizes alliance and association-based classification of unique vegetation stands. CDFW utilizes vegetation descriptions found in the Manual of California Vegetation (MCV), found online at http://vegetation.cnps.org/. To determine the rarity ranking of vegetation communities on the Project site, the MCV alliance/association community names should be provided as CDFW only tracks rare natural communities using this classification system. 3-7

Mitigation Measure #3: CDFW recommends avoiding any sensitive natural communities found on the Project. If avoidance is not feasible, mitigating at a ratio of no less than 5:1 for impacts to S3 ranked communities and 7:1 for S2 communities should be implemented. This ratio is for the acreage and the individual plants that comprise each unique community. All revegetation/restoration areas that will serve as mitigation should include preparation of a 3-8

restoration plan, to be approved by USFWS and CDFW prior to any ground disturbance. The restoration plan should include restoration and monitoring methods; annual success criteria; contingency actions should success criteria not be met; long-term management and maintenance goals; and, a funding mechanism to assure for in perpetuity management and reporting. Areas proposed as mitigation should have a recorded conservation easement and be dedicated to an entity which has been approved to hold/manage lands (Assembly Bill 1094; Government Code, §§ 65965-65968).

3-8 Cont.

Mitigation Measure #4: CDFW recommends that a monitoring period of a minimum of 10 years should be established for long-lived arid communities such as oaks and walnuts being impacted.

3-9

Comment #2: Impacts to Streams

Issue: Page 55 of the IS/MND states that heavy equipment may be placed in the Los Angeles River. "If that method of access is not deemed possible during construction, access via the Los Angeles River may be necessary. A boom or scissor lift would be placed in the Los Angeles River for workers to drill holes on the bridge soffit and install steel band and lateral bracing that would add additional support to the existing pipe." The Project location may support streams subject to notification under Fish and Game code section 1600 *et seq*.

Specific impacts: The Project may result in the loss of streams and associated watershed function and biological diversity. The placement of equipment directly into the Los Angeles River may diminish onsite and downstream water quality.

Why impacts would occur: Placing heavy construction equipment into the Los Angeles River could decrease water quality on the Project site via leaks of oil or other petroleum products. Downstream streams and associated biological resources beyond the Project development footprint may be impacted by Project-related releases of sediment and altered watershed effects resulting from Project activities.

Evidence impacts would be significant: The Project may substantially adversely affect the existing stream pattern of the Project site through the alteration or diversion of a stream, which absent specific mitigation, could result in substantial erosion or siltation on site or off site of the Project. Debris, soil, silt, sawdust, rubbish, raw cement/concrete or washings thereof, asphalt, paint or other coating material, oil or other petroleum products, or any other substances which could be hazardous or deleterious to aquatic life, wildlife, or riparian habitat resulting from Project related activities may enter the stream.

3-10

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: For any such activities, the Project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 *et seq*. of the Fish and Game Code. Based on this notification and other information, CDFW shall determine whether a Lake and Streambed Alteration (LSA) Agreement is required prior to conducting the proposed activities. A notification package for a LSA may be obtained by accessing CDFW's web site at https://www.wildlife.ca.gov/conservation/lsa.

CDFW's issuance of an LSA Agreement for a Project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may

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consider the CEQA document of the Lead Agency for the Project. To minimize additional requirements by CDFW pursuant to section 1600 *et seq.* and/or under CEQA, the CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement.

Mitigation measure #2: Any LSA Agreement issued for the Project by CDFW may include additional measures protective of streambeds on and downstream of the Project such as additional erosion and pollution control measures. To compensate for any on-site and off-site impacts to riparian resources, additional mitigation conditioned in any LSA Agreement may include the following: avoidance of resources, on-site or off-site creation, enhancement or restoration, and/or protection and management of mitigation lands in perpetuity.

3-10 Cont.

Filing Fees

The Project, as proposed, could have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required for the underlying project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & Game Code, § 711.4; Pub. Resources Code, § 21089).

3-11

Conclusion

We appreciate the opportunity to comment on the Project to assist Los Angeles Department of Water and Power in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that LADWP has to our comments and to receive notification of any forthcoming hearing date(s) for the Project. If you have any questions or comments regarding this letter, please contact Andrew Valand, Environmental Scientist, at Andrew.Valand@wildlife.ca.gov or (562) 342-2142.

3-12

Sincerely,

DocuSigned by:
Erinn Wilson 5/15/2020
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Erinn Wilson
Environmental Program Manager I

ec: CDFW
Victoria Tang – Los Alamitos
Megan Evans – Los Alamitos
Andrew Valand – Los Alamitos
Malinda Santonil – Los Alamitos
CEQA HQ – Sacramento

State Clearinghouse

References:

California Department of Fish and Wildlife [CDFW]. March 20,2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see https://www.wildlife.ca.gov/Conservation/Plants).

Sawyer, J.O., Keeler Wolf, T., and Evens J.M. 2008. A manual of California Vegetation, 2nd ed. ISBN 978 0 943460 49 9.

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CDFW recommends the following language to be incorporated into a future environmental document for the Project.

Biological Resources			
	Mitigation Measure	**Timing**	**Responsible Party**
MM-BIO-1 – Sensitive/rare Plant Surveys	The Project proponent shall conduct focused surveys for sensitive/rare plants on site and disclose the results in the final environmental document. Based on the *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (CDFW 2018), a qualified biologist shall "conduct surveys in the field at the time of year when species are both evident and identifiable. Usually this is during flowering or fruiting." The final CEQA documentation shall provide a thorough discussion on the presence/absence of sensitive plants on site and identify measures to protect sensitive plant communities from Project-related direct and indirect impacts.	Prior to construction	Los Angeles Department of Power and Water
MM-BIO-2 – Mapping According to Manual of California Vegetation	The Project proponent shall provide the Manual of California Vegetation alliance/association community names for mapped vegetation in the final environmental document to determine the rarity ranking of vegetation communities on the Project site.	Prior to construction	Los Angeles Department of Power and Water
MM-BIO-3 – Replacement of Sensitive Vegetation	The Project proponent shall avoid any sensitive natural communities found on the Project. If avoidance is not feasible, the Project proponent shall mitigate at a ratio of no less than 5:1 for impacts to S3 ranked communities and 7:1 for S2 communities. This ratio is for the acreage and the individual plants that comprise each unique community. All revegetation/restoration areas that will serve as mitigation shall include preparation of a restoration plan, to be approved by USFWS and CDFW prior to any ground	Prior to construction	Los Angeles Department of Power and Water

3-12
Cont.

	disturbance. The restoration plan shall include restoration and monitoring methods; annual success criteria; contingency actions should success criteria not be met; long-term management and maintenance goals; and, a funding mechanism to assure for in perpetuity management and reporting. Areas proposed as mitigation should have a recorded conservation easement and be dedicated to an entity which has been approved to hold/manage lands.		
MM-BIO-4 – Tree Monitoring	CDFW recommends that a monitoring period of a minimum of 10 years should be established for long-lived arid communities such as oaks and walnuts being impacted.	Prior to Project completion	Los Angeles Department of Power and Water
MM-BIO-5 – Notification for a Lake & Streambed Alteration Agreement	For activities resulting in the alteration of streams, the Project proponent must provide written notification to CDFW pursuant to Section 1600 *et seq*. of the Fish and Game Code. To minimize additional requirements by CDFW pursuant to Fish and Game Code, Section 1600 *et seq*. and/or under CEQA, the CEQA document shall fully identify the potential impacts to the stream or riparian resources and shall provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.	Prior to construction	Los Angeles Department of Power and Water
MM-BIO-6 – Additional Measures in Lake & Streambed Alteration Agreements	To compensate for any on-site and off-site impacts to riparian resources, the Project proponent shall provide measures of avoidance of resources, on-site or off-site creation, enhancement or restoration, and/or protection and management of mitigation lands in perpetuity.	Prior to construction	Los Angeles Department of Power and Water

3-12
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Response to Comment Letter 3
Erinn Wilson, Environmental Program Manager I
State of California Department of Fish and Wildlife
May 15, 2020

3-1 This comment is introductory in nature. As substantiated in the IS/MND, and as further described in the responses below, the proposed project is not expected to result in "take" of an endangered species or a rare plant. The potential for the project to require a Lake and Streambed Alteration Agreement is addressed in Response 3-5 below.

3-2 This comment provides a synopsis of the project and the project location from the IS/MND and does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the IS/MND. No further response is necessary.

3-3 The project's potential effects to the coast live oak and southern California black walnut association have been analyzed and disclosed in the IS/MND. Specifically, Section 6.1.1 of the Biological Technical Report (Appendix B of the IS/MND) states that Disturbed Coast Live Oak - Southern California Walnut Woodland Association is present on and within the vicinity of the project site. The Biological Technical Report identifies that this association has a rank of G3 and that this association is considered a sensitive natural community by CDFW. The Biological Technical Report cites Faber- Langendoen, et al (2012) as the source of this ranking. Since the completion of the Biological Technical Report, CDFW issued a new California Sensitive Natural Community list, dated November 8, 2019, which has changed the rank of this community to G3/S3. This revised rank still indicates that the community is considered sensitive, consistent with how the community is described in the IS/MND. As such, the updated ranking does not change the impact analysis or the impact conclusions presented in the IS/MND. The IS/MND has therefore identified and disclosed the presence of a sensitive natural community on and within the vicinity of the project site. Nevertheless, the Biological Technical Report has been revised as part of this Final IS/MND to show the more recent version of the ranking (see the Preface and Errata of this Final IS/MND, which shows this change). This revision has not altered the impact analysis or impact conclusions of the IS/MND.

The IS/MND identifies potentially significant impacts to the coast live oak and southern California black walnut association. However, mitigation measure MM-BIO-2 is set forth to address this potentially significant impact. With incorporation of MM-BIO-2, impacts to the coast live oak and southern California black walnut association would be considered less than significant.

3-4 Consistent with this comment, the IS/MND identifies potentially significant impacts to the coast live oak–southern California walnut woodland association. The Biological Technical Report specifically identifies this community as "Disturbed Coast Live Oak - Southern California Walnut Woodland Association" due to the removal of the natural understory within the community from over 30 years of fuel modification that will need to continue for fire hazard control, based on the existing residential structures adjacent to the project site. The Biological Technical Report identifies and maps this association within the vicinity of the project and also identifies the trees and key plant species within the association, as well as those that were found to be present on the project site. Impacts to this vegetation community would be addressed through a tree replacement plan, set forth in MM-BIO-2, and through compliance with the City of Los Angeles Protected Tree Ordinance. The analysis in the IS/MND found that implementation of MM-BIO-2 and required compliance with the City of Los Angeles Protected Tree Ordinance would reduce impacts to the affected sensitive vegetation community to below a level of significance. MM-BIO-2 requires LADWP to replace the removed trees with trees of similar species, which is consistent with the recommendations in this comment. Because the proposed project is estimated to result in the removal of five southern California black walnut trees and three coast live oak trees, MM-BIO-2 requires a minimum of 20 southern California black walnuts and 12 coast live oak to be planted to replace the trees that would be removed. (This equates to a replacement ratio of 4:1.) Regarding replacement of other native plants within the coast live oak–southern California walnut woodland association, impacts to the understory species are not expected to be significant for the reasons enumerated in the following paragraphs. As such, mitigation would not be required for the understory.

As stated in Section 7.2 of the Biological Technical Report, the understory of the coast live oak–southern California walnut woodland association within the project site has been regularly disturbed due to fuel reduction required for the surrounding residential properties. Based upon available historic aerial imagery, the clearance of vegetation began between 1980 and 1989, and has continued to the present (NETR 2020). This clearance is expected to continue occurring and would continue to prevent the development of the understory within the project site. Furthermore, fuel modification practices have resulted in dense shortpod mustard (*Hirschfeldia incana*) and ripgut brome (*Bromus diandrus*) dominating the understory composition. Immature poison oak (*Toxicodendron diversilobum*) was found to be the sole representative of the typical understory for coast live oak–southern California walnut woodland association observed during a biological survey of the site. Additionally, a majority of the project and associated ground-disturbing activities would take place within paved roadways, with the exception of installation of a flow control station vault at 3380 Coldwater Canyon Avenue. In addition to regular fuel modification, this property has also been used by LADWP for water system infrastructure since the early 1900s. As such, this property is routinely accessed and used by LADWP for operations and maintenance of the water system, resulting in additional disturbance to the understory at this property.

Subsequent to release of the Draft IS/MND for public review, additional details regarding the design of the project at the LADWP-owned property (3380 Coldwater Canyon Avenue) have become available. Section 7.2 of the Biological Technical Report, which describes the project's impacts to the coast live oak–southern California walnut woodland association, has been revised to reflect these additional details. (See the Preface and Errata of this Final IS/MND for these revisions.) The discussion below also incorporates these new details. As described in the Preface and Errata and as demonstrated below, the additional details that have been added as part of the Final IS/MND have not changed the impact conclusions or mitigation measures in the IS/MND and do not warrant recirculation of the IS/MND under CEQA.

Within the property located at 3380 Coldwater Canyon Avenue, permanent and temporary impacts would occur to the coast live oak–southern California walnut woodland association. Due to the proposed installation of the flow control station vault, the project would permanently impact 0.01 acres of coast live oak–southern California walnut woodland association (including several coast live oak and southern California black walnut trees) and would temporarily impact 0.18 acres of coast live oak–southern California walnut woodland association. (Figure 5 has been added to the Biological Technical Report to show these permanent and temporary impact areas.) While several trees associated with coast live oak–southern California walnut woodland association would be lost, replacement trees would be planted on the property per MM-BIO-2, at a 4:1 ratio. The additional number of trees added to the community would enhance the quality of the vegetation community and would adequately mitigate for the impacts. While trenching would result in temporary and permanent impacts to the understory of the coast live oak–southern California walnut woodland association, these impacts would be not be considered significant. The permanent loss of 0.01 acres of understory dominated by nonnative, invasive species is not significant based upon the small area and the species composition being removed. The 0.18 acres of temporary impacts to the understory would be expected to revert to the existing conditions due to the nature of the nonnative, invasive species present, so the impact would not be significant. The installed pipe would be covered with earth, which would allow for the existing plant species found on site to reestablish in the area. The small temporary and permanent losses of the disturbed understory of the vegetation community, composed primarily of shortpod mustard and ripgut brome, would not be significant based upon the remaining coast live oak–southern California walnut woodland association on the property and in the project vicinity, the disturbed nature of the understory, and the predominance of nonnative, invasive species within the understory. For these reasons, replacement of native understory plant species would not be required to reduce impacts below a level of significance. Through implementation of MM-BIO-2, the function and value of the impacted native tree species and the coast live oak–southern California walnut woodland association would be retained on site.

3-5 Potentially significant impacts were identified to the sensitive vegetation community; however, impacts would be reduced below a level of significance through implementation of MM-BIO-2, as described in Response 3-4. The Biological Technical Report prepared for the project includes a map of the biological resources within the project site and in the vicinity of the project site (see Figure 3 in the Biological Technical Report). This map identifies the scientific name for the coast live oak–southern California walnut woodland association (*Quercus agrifolia – Juglans californica*) and shows the area within and near the project site that is identified as coast live oak–southern California walnut woodland association. However, in response to this comment and based upon more detailed engineering designs for the project that have been completed since the time of the Draft IS/MND, an additional map has been added to the Biological Technical Report. This map (Figure 5 of the Biological Technical Report) shows the area of coast live oak–southern California walnut woodland association that would be subject to temporary and permanent impacts. A description of this association and its characteristics is provided in Section 6.1 of the Biological Technical Report. The description includes examples of species found within this association and cites the document describing the specific membership requirements for this alliance (Keeler-Wolf and Evans 2006). In response to this comment, Section 6.1 has been revised to include the scientific name and membership requirements of the coast live oak–southern California walnut woodland association. As such, the IS/MND has adequately identified, described, and mapped the coast live oak–southern California walnut woodland association as it relates to the project. The additional details regarding the coast live oak–southern California walnut woodland association that have been added as part of this Final IS/MND have clarified and amplified information in the IS/MND but have not altered the impact conclusions or mitigation measures in the IS/MND. As such, these revisions do not warrant recirculation of the IS/MND under CEQA.

3-6 The comment provides a number of recommended mitigation measures. These measures are summarized herein, followed by LADWP's responses. The commenter recommends conducting focused surveys for sensitive/rare plants on site. The project site was surveyed on May 29, 2019, by a biologist with 15 years' experience in conducting plant surveys in southern California. The date of this survey falls within the blooming period for the special-status plant species with recorded occurrences in the project vicinity. No special-status species were observed on the project site, and overall species diversity was low. Additional focused plants surveys were deemed unnecessary based on the results of the survey, the existing conditions of the project site, and absence of the associated habitat requirements of the special-status plant species with known occurrences in the project region. The survey results are summarized in the IS/MND and documented in further detail in the Biological Technical Report (Appendix B of the IS/MND). While potentially significant impacts were identified in the IS/MND to sensitive vegetation communities, implementation of MM-BIO-2 was determined to reduce impacts to below a level of significance.

3-7 The comment states that the rarity ranking of vegetation communities on the project site should be determined by providing alliance/association community names from the California Manual of Vegetation (MCV), which can be found online. Vegetation community classifications used in the IS/MND are based on this recommended manual: MCV, 2nd Edition. The online version of the MVC cited in this comment is based upon this classification. The coast live oak–southern California walnut woodland association is recognized in the MVC (see http://vegetation.cnps.org/alliance/78). As such, the analysis in this IS/MND relies on the vegetation classification system recommended in this comment and adds the "Disturbed" modifier to the community due to the removal of the natural understory from over 30 years of fuel modification, which will need to continue due to existing residential structures adjacent to the project site.

3-8 The commenter recommends avoidance of sensitive natural communities. If avoidance is not feasible, mitigation is recommended at a ratio of no less than 5:1 for impacts to S3-ranked communities and 7:1 for S2-ranked communities. All revegetation/restoration areas should include a restoration plan, to be approved by the United States Fish and Wildlife Service and CDFW.

The project site does not include S2-ranked communities. As described above, the project site includes an S3-ranked community (the coast live oak–southern California walnut woodland association). Trees removed from this community would be replaced at a ratio of 4:1, as required by MM-BIO-2. As described in Response 3-4, the proposed project would not result in significant impacts to the understory of the coast live oak–southern California walnut woodland association, and mitigation would not be required for the understory species. The additional trees added per MM-BIO-2 would enhance the quality of the vegetation community and would adequately mitigate for the project's impacts.

3-9 The comment recommends that a monitoring period of a minimum of 10 years should be established for long-lived arid communities such as oaks and walnuts. As prescribed in MM-BIO-2, the replacement trees would be subject to a 5-year monitoring effort by an independent third-party certified arborist. The monitoring effort will consider growth, health, and condition of the subject trees in order to evaluate the trees' success. The monitoring effort may result in a recommendation of remedial actions should any of the tree plantings exhibit poor or declining health. This measure was set forth in the Protected Tree Report for the project, which was prepared by certified arborists (see IS/MND, Appendix B). A 5-year monitoring effort was considered sufficient and is also the industry standard. LADWP would have the option to extend monitoring beyond five years, should there be losses to the installed trees that would lower the surviving number below the required replacement number. Additionally, MM-BIO-2 recommends the installation of a greater number of trees than what is required to allow for a buffer to ensure that the loss of the existing trees is still mitigated to a less than significant impact.

3-10 Potential impacts to the Los Angeles River are described and disclosed in Section 3.4 of the IS/MND, as well as in the Biological Technical Report for the project (IS/MND, Appendix B). Providing a notification to CDFW would not be considered mitigation but rather a required procedure per Fish and Game Code Section 1600 et seq. Work within the Los Angeles River is not anticipated as part of this project. An alternative is presented in the IS/MND, should work need to occur under the Coldwater Canyon Avenue bridge. LADWP will provide a submission of notification to CDFW and understands that CDFW will determine if a Lake and Streambed Alteration Agreement is necessary for the potential temporary work within the Los Angeles River. The Los Angeles River is a concrete channel at the Coldwater Canyon Avenue bridge crossing. As stated in the IS/MND, a boom or scissor lift would be placed in the Los Angeles River. To prevent impacts to the river, the boom or scissor lift would be rubber tired and would be lowered into the channel with a crane. Equipment within the river would be removed at the end of each work day and would not remain in the channel overnight. The methods of using rubber-tired equipment, placing the equipment into the channel with a crane, and removing equipment from the river channel after each work day would ensure that direct impacts to the Los Angeles River would be avoided. The proposed project is not expected to substantially divert or obstruct the natural flow or substantially change or use any material from the bed, channel, or bank of the concrete channel containing the waters of the Los Angeles River. As such, permanent impacts to jurisdictional waters would not be expected from the placement of vehicles and equipment in the channel. Potential temporary impacts to downstream waters from potential accidental releases of fuel, oil, lubricants, paints, release agents, and other construction materials could occur. These impacts have been described and disclosed in Section 3.4 of the IS/MND. As stated therein, such temporary impacts would be addressed through best management practices required in the proposed project's Storm Water Pollution Prevention Plan (SWPPP). With implementation of the SWPPP best management practices, temporary indirect impacts from project construction would be considered less than significant, as described and disclosed in the IS/MND.

In the event that a Lake and Streambed Alteration Agreement is determined to be necessary by CDFW, LADWP would implement any additional conditions that may be required as part of the agreement. While impacts were determined to be less than significant, any additional conditions that are applied would be even more protective of biological resources in the project area.

3-11 This comment describes the CDFW filing fees that would be required for the project.

LADWP would be required to pay the appropriate CDFW filing fees and would do so at the time that the Notice of Determination is filed for the project, in the event that the project is approved and the MND is adopted.

3-12 This comment states that CDFW appreciates the opportunity to comment on the project. The commenter requests that CDFW be given an opportunity to review and comment on any responses from LADWP and that CDFW also be notified of any forthcoming hearing date(s) for the project. This comment also provides contact information for any questions or coordination related to CDFW's comments. This comment provides a list of measures recommended by CDFW, which are duplicative of the recommendations discussed in the comments above.

LADWP will provide a written response to CDFW prior to consideration of the proposed project for approval. Additionally, LADWP will retain CDFW on its mailing list for the proposed project, to ensure that CDFW receives notices pertaining to the project, including any notifications of hearings. For responses to the recommended measures in this comment, refer to the responses above.

References

Faber-Langendoen, D., J. Nichols, L. Master, K. Snow, A. Tomaino, R. Bittman, G. Hammerson, B. Heidel, L. Ramsay, A. Teucher, and B. Young. 2012. NatureServe Conservation Status Assessments: Methodology for Assigning Ranks. NatureServe, Arlington, VA.

Keeler-Wolf, T., and J. Evens. 2006. Vegetation classification of the Santa Monica Mountains National Recreation Area and environs in Ventura and Los Angeles counties, California. A report submitted to National Park Service, Santa Monica Mountains. Accessed August 2019. https://www1.usgs.gov/csas/nvcs/nvcsGetUnitDetails?elementGlobalId=788730.

NETR (Nationwide Environmental Title Research). 2020. Historic Aerials; online viewer. Accessed May 2020. https://www.historicaerials.com/viewer.

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Comment Letter 4

GABRIELENO BAND OF MISSION INDIANS - KIZH NATION
Historically known as The San Gabriel Band of Mission Indians
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

Notice of Intent to Adopt An Initial Study/ Mitigated Negative Declaration

May 14, 2020

Los Angeles Department of Water& Power

111 North Hope Street, Room 1044

Los Angeles, CA 90012

Dear James Howe,

We have received your Notice of Intent to adopt a Negative Declaration for the City Trunk Line South 5 Phase II and Unit 6 Project in the location of the City of Los Angeles. Our Tribal Government is requesting the retention of a Native American Tribal Consultant to monitor all ground disturbance conducted for this project. 4-1

Sincerely,
Gabrieleno Band of Mission Indians/Kizh Nation
(1844) 390-0787 Office

Andrew Salas, Chairman | Nadine Salas, Vice-Chairman | Dr. Christina Swindall Martinez, secretary
Albert Perez, treasurer I | Martha Gonzalez Lemos, treasurer II | Richard Gradias, Chairman of the council of Elders

PO Box 393 Covina, CA 91723 www.gabrielenoindians@yahoo.com gabrielenoindians@yahoo.com

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Response to Comment Letter 4
Gabrieleno Band of Mission Indians-Kizh Nation
May 14, 2020

4-1 This comment states that the Gabrieleno Band of Mission Indians – Kizh Nation is requesting the retention of a Native American Tribal Consultant to monitor all ground disturbance conducted for this project.

Section 3.18 of the IS/MND addresses impacts to tribal cultural resources and describes the consultation process that took place for the proposed project pursuant to Assembly Bill (AB) 52. As described in Section 3.18, LADWP consulted with the Gabrieleno Band of Mission Indians – Kizh Nation pursuant to AB 52 in February 2020. The Gabrieleno Band of Mission Indians – Kizh Nation stated that there is a high potential for inadvertent discoveries of tribal cultural resources during project construction. As further stated in Section 3.18, in the event that unknown subsurface tribal cultural resources are uncovered during construction ground disturbance, and such resources are not identified and avoided or properly treated, a potentially significant impact could result. Mitigation measures MM-TCR-1, MM-TCR-2, and MM-TCR-3 have been set forth to protect tribal cultural resources, in the event that any are discovered during project construction.

MM-TCR-2 specifically requires tribal representatives who have participated in Native American consultation for the project to be contacted prior to the start of construction activities to determine the appropriate Native American monitor(s), the phases and locations of project ground-disturbing activities that would involve monitoring, and the frequency and duration of monitoring throughout construction. The Gabrieleno Band of Mission Indians – Kizh Nation participated in Native American consultation for the project. As such, this tribe will be contacted (as required per MM-TCR-2) prior to the start of project construction and will have the opportunity to participate in determining the plan for Native American monitoring during project ground-disturbing activities.

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Comment Letter 5

From: Steve Moore
To: Howe, James
Cc: (Legacy) - Lily Moore
Subject: [EXTERNAL] 3619 Coldwater Canyon Ave., Studio City Reply to your letter & our water damage claim
Date: Monday, May 11, 2020 11:54:41 AM

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Hi James,

Per our telephone conversation, I'm following up via email per your request. My home is located at:
3619 Coldwater Canyon Ave., Studio City, CA 91604. The following lists our conversation: 5-1

I asked you weather or not there will be any assessments to home owners for the work that you will be doing:
Your reply was that you didn't know and that you would look into it.

You stated that the project in question is set to begin Oct. 2022 and will last for 18 months. You stated that there
will be access for home owners to get to and from their homes. You stated that there would be no service interruptions.
The only possible interruption being the day the new pipe is hooked up.

I told you of the major water damage our home just experienced as per our plumber, the city caused the problem do
to turning off then back on their water lines. This caused severe pressure to go through our lines which blew a hole in
a flexible hot water line under our kitchen sink. Wood floors, cupboards, drywall, etc have major damage and we are
looking for the city to cover these costs. You said to call DWP Customer Service (800) 342-5397 to sort it out with them.
Can you please double check with Charles Holloway if in fact, this is the case? 5-2

I look forward to your prompt reply.

PS: I suggest that you send out another letter that more clearly states what you are proposing, what our options are, and to
provide the information that I had to call you and glean the information through the questions I posed to you. 5-3

Count Steven Moore-CEO
Legacy Entertainment
www.legacyus.com
15550 Cohasset St.

Van Nuys, CA 91406
T: 818-505-0025
C: 818-481-1017
F: 818-505-0545
Email: steve@legacyus.com

Response to Comment Letter 5
Count Steven Moore, CEO
Legacy Entertainment
May 11, 2020

5-1 This comment provides the commenter's address and references a telephone conversation held with LADWP.

This comment does not raise a specific concern or question regarding the adequacy of the environmental impact analysis in the IS/MND; no further response is necessary. The address given in this comment is not located along the project alignment and is approximately 300 feet south of the project alignment. As such, construction activities associated with the proposed project would not occur immediately adjacent to the residence mentioned in this comment.

5-2 This comment documents several questions that the commenter asked of LADWP during a telephone conversation. Questions listed in the comment include whether homeowners would be assessed for the cost of the proposed project and whether the City would cover costs of recent water damage in the commenter's home. The comment also documents information that was provided by LADWP regarding access for residents during project construction and service interruptions.

Comments pertaining to costs associated with the proposed project and costs associated with water damage do not pertain to the environmental analysis of the proposed project under CEQA. No further response is necessary for the purposes of the Final IS/MND.

Regarding access to properties along the project alignment during construction, Section 3.17 of the IS/MND describes potential impacts to transportation that could occur during project construction, including travel along roadways in the project area, emergency access, and access to residences in the area. While potentially significant impacts are identified, mitigation measure MM-TRAF-1 has been set forth to ensure that transportation impacts are minimized. MM-TRAF-1 includes provisions to ensure that two-way travel is provided along Coldwater Canyon Avenue throughout construction and to ensure safe passage areas for bicyclists and pedestrians in the impacted work areas. The provisions set forth in MM-TRAF-1 would ensure that transportation-related impacts would not be significant. Furthermore, LADWP would ensure that residents and businesses in the project area are well informed regarding access and water service leading up to construction.

5-3 This comment provides a recommendation for LADWP to send out another letter with project details, including the information that the commenter obtained during their phone call with LADWP.

LADWP distributed a Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) to interested or involved public agencies, organizations, and addresses adjacent to and within the vicinity of the project. The

NOI was distributed for the purposes of complying with CEQA. The NOI and the IS/MND provides the level of detail that is required pursuant to CEQA. The proposed project must be approved by LADWP decision makers before it can proceed. If the project is approved, LADWP would ensure that residents and businesses in the project area are well informed leading up to construction. For the purposes of coordinating proposed project construction with the neighborhood surrounding the project alignment, LADWP would conduct separate outreach and notification processes, particularly closer to the start of construction.

Comment Letter 6

From: Nancy Smith
To: Howe, James
Subject: [EXTERNAL] City Trunk Line Unit 6
Date: Thursday, May 14, 2020 11:59:50 AM

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Please do not include my email address as part of the public record.

Mr. Howe,
I received a notice on the upcoming City Trunk Line for Unit 5 Phase II and Unit 6 project and have some questions and concerns. The letter as well as the documents on the LADWP website did not give specifics on the project nor how this project would affect the residents of Oeste Ave. 6-1

Oeste is a short, but narrow, street consisting of nine houses plus two additional under construction. The DWP pumping station is approximately half way to the end. As such, currently there is limited access for emergency vehicles especially in light of the ongoing construction of two homes. 6-2

1. It appears a 60" pipe will be installed in an open trench on Oeste and the existing Flow Control Station is being replaced or removed. It this correct? What specifically will be happening on Oeste Ave? 6-3

2. How long will the construction take? 6-4

3. What accommodations are being made for us to be able to access our homes during construction? 6-5

4. Will emergency vehicles be able to access the homes on Oeste during the project? 6-6

5. Will the existing Flow Control Station be landscaped to blend in with the surrounding community? 6-7

Any additional and specific information would be appreciated.

Nancy Smith
3977 Oeste Ave
Studio City, 91604

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Response to Comment Letter 6
Nancy Smith
May 14, 2020

6-1 This comment states that the letter received by the commenter, as well as documents available on LADWP's website, did not provide specifics on the project or how the project would affect Oeste Avenue residents.

LADWP distributed a Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) to interested or involved public agencies, organizations, and addresses adjacent to and within the vicinity of the project. The NOI was distributed for the purposes of CEQA compliance and provided the level of detail that is required by CEQA. The project must be approved by LADWP decision makers before it can proceed. If the project is approved, LADWP would ensure that residents and businesses in the project area are well informed leading up to construction. For the purposes of coordinating proposed project construction with the neighborhood surrounding the project alignment, LADWP would conduct separate outreach and notification processes, particularly closer to the start of construction.

Effects to Oeste Avenue and residences along Oeste Avenue have been analyzed and disclosed in the IS/MND, pursuant to CEQA. Figure 2-1 (Project Components) shows the extent of the proposed project alignment along Oeste Avenue, as well as the types of project activities that would occur along Oeste Avenue. Section 3.3 of the IS/MND analyzes the effects of construction air emissions on nearby sensitive receptors, which include residences along Oeste Avenue. Effects were determined to be less than significant. Section 3.13 of the IS/MND analyzes of the effects of construction noise on nearby sensitive receptors, including residences along Oeste Avenue. Effects were determined to be potentially significant; however, mitigation measures have been set forth that would reduce these impacts to below a level of significance. Section 3.17 addresses potential effects to transportation, including effects related to property access and emergency vehicle access along Oeste Avenue. As stated in Section 3.17, construction activity may block parking and portions of travel lanes or full blocks, may restrict access to driveways, may disrupt access for emergency providers, and may result in potential safety issues and nuisances for vehicular traffic, pedestrians, bicyclists, and transit riders along Coldwater Canyon Avenue, Avenida Del Sol, Oeste Avenue, and some of the intersecting cross streets. To minimize the potential effects of project construction on transportation, a mitigation measure (MM-TRAF-1) has been set forth in this IS/MND and would be required as part of the project. MM-TRAF-1 includes provisions to ensure that two-way travel is provided along Coldwater Canyon Avenue throughout construction. Where two-way travel may not be possible along Oeste Avenue, implementation of MM-TRAF-1 would ensure that an access plan is provided for residents and emergency vehicles. MM-TRAF-1 also requires workers with flags to be posted at each work site and requires provisions to ensure safe passage areas for bicyclists and pedestrians. With implementation of MM-TRAF-1, transportation-related impacts during construction were found to be less than significant.

6-2 This comment states that Oeste Avenue is a short, narrow street consisting of nine houses, with two additional houses under construction. The comment further states that there is limited access for emergency vehicles, especially with the ongoing construction of two homes.

The constraints and characteristics of Oeste Avenue are described in the IS/MND, and nature of Oeste Avenue has been considered for the purposes of the environmental analysis in the IS/MND. The analysis in Sections 3.3 (Air Quality) and 3.13 (Noise) considers the proximity of construction to residential sensitive receptors, including those along Oeste Avenue. As described above in Response 6-1, MM-TRAF-1 includes provisions for emergency access along Oeste Avenue, as well as access for residents. With mitigation, impacts were determined to be below a level of significance.

Section 3.21 of the IS/MND addresses the potential cumulative effects of the project, including the potential for proposed project construction to combine with the construction effects of nearby projects. Such cumulative impacts were determined to be less than significant, after implementation of the mitigation measures for the proposed project that are identified throughout the IS/MND. Nevertheless, it is also noted that project construction is anticipated to begin in November 2021. As such, construction projects that are currently underway could be completed by this time. LADWP would coordinate with residents as necessary to minimize construction conflicts.

6-3 This comment asks whether a 60-inch pipe would be installed in an open trench along Oeste Avenue and whether the existing Flow Control Station would be replaced or removed. The comment requests further information regarding the proposed construction activities along Oeste Avenue.

Figure 2-1 (Project Components) in the IS/MND shows the specific construction activities that are proposed along Oeste Avenue. As shown in Figure 2-1, portions of the existing pipeline within Oeste Avenue would be relined with carbon fiber reinforced polymer (CFRP). This process does not require open trenching; CFRP is installed via manhole access. A small portion of new pipeline (approximately 200 linear feet) would be installed along Oeste Avenue using the open trench method. The new pipeline would be 60 inches in diameter and would replace the existing Flow Control Station within Oeste Avenue. Other activities along Oeste Avenue would consist of the following: interior improvements within the existing Coldwater Canyon Pump Station located along Oeste Avenue (consisting of the removal of four existing pump units, installation of four new pump units, replacement of valves within the pump station, and replacement of piping to accommodate the new pumps); and, installation of a new flow control station vault on an LADWP-owned property, located at 3380 Coldwater Canyon Avenue (which is at the southern/uppermost end of Oeste Avenue).

As stated above, the proposed project descriptions included in the NOI and in the IS/MND are provided for the purposes of CEQA compliance. If the project is approved by LADWP decision makers, LADWP would ensure that residences and businesses in the project area are well informed leading up to construction.

6-4 This comment requests information regarding construction duration.

An anticipated construction schedule has been provided in the IS/MND for the purposes of the environmental analysis and is shown as extending from November 2021 through May 2023. As stated above, if the project is approved by LADWP decision makers, LADWP would ensure that residents and businesses in the project area are well informed of construction activities leading up to construction.

6-5 This comment requests information regarding resident access during construction.

As stated in Response 6-1, a mitigation measure (MM-TRAF-1) has been set forth in this IS/MND to address potentially significant transportation effects during construction, including access issues. MM-TRAF-1 includes a provision to ensure that an access plan is provided for residents and emergency vehicles along Oeste Avenue. LADWP would issue resident passes as necessary.

6-6 This comment requests information regarding emergency vehicle access during construction. See Responses 6-1 and 6-5, which both concerns regarding access along Oeste Avenue during construction.

6-7 This comment asks whether the existing Flow Control Station would be landscaped to blend in with the surrounding community. The comment further states that any additional and specific information would be appreciated.

It is assumed that the commenter is referring to the existing Coldwater Canyon Pump Station, which is an aboveground LADWP building located along the west side of Oeste Avenue. As described in Response 6-3, the proposed project would involve interior improvements within the existing Coldwater Canyon Pump Station.

As stated above, if the project is approved by LADWP decision makers, LADWP would ensure that residents and businesses in the project area are well informed leading up to construction. For the purposes of coordinating construction activities with the neighborhood surrounding the project alignment, LADWP would conduct separate outreach and notification processes, particularly closer to the start of construction.

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Comment Letter 7

From: Jennifer
To: Howe, James
Subject: [EXTERNAL] Coldwater City Trunk Line
Date: Friday, May 8, 2020 6:53:49 PM

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Hello,

Coldwater was closed several days last week, blocking access to our residence at 3371 Coldwater Canyon Ave. Are there resident road passes available as this project continues like there were for the past project? We need to be able to come and go. Additionally, we have employees that need to be able to get through as well. Please advise. 7-1

Thank You,
Jennifer

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Response to Comment Letter 7
Jennifer
May 8, 2020

7-1 The comment states that during a recent closure of Coldwater Canyon Avenue, access to the commenter's residence was blocked. The commenter is inquiring if resident road passes will be provided and if employees will have access during project construction.

See Responses 5-2 and 6-1 above, which address similar concerns regarding property access during project construction. As stated in Section 2.5 of the IS/MND, to minimize potential traffic and transportation impacts, the construction of the proposed project would be implemented in accordance with the Standard Specifications for Public Works Construction (Greenbook). Traffic Control Plans would be designed, reviewed, and approved by LADOT in coordination with LADWP. Implementation of the Traffic Control Plan would allow acceptable levels of service, traffic safety, and emergency access to the site during construction. Additionally, access to the surrounding residences, businesses, and schools would be maintained during construction with two-way traffic being maintained where practicable. LADWP would issue resident passes as necessary. Additionally, as described in Responses 5-2 and 6-1, mitigation measure MM-TRAF-1 has been set forth in the IS/MND to minimize impacts related to transportation during project construction. MM-TRAF-1 includes a provision for maintaining two-way travel along Coldwater Canyon Avenue throughout construction.

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Comment Letter 8

May 14, 2020

Mr. Charles C. Holloway
Manager, Environmental Planning and Assessment
Los Angeles Department of Water and Power
111 North Hope Street Room 1044
Los Angeles, CA 90012

Dear Mr. Holloway:

Following up on a recent conversation with James Howe of your staff, we wish to express some concerns and obtain further information regarding the proposed project entitled Unit 6 alignment on Coldwater Canyon Avenue , Avenida Del Sol and Oeste Avenue in Studio City. Mr. Howe advised us that the start date of this project is schduled to commence in November, 2021 and complete in May of 2013. We appreciate the courtesy and information he extended in our phone call. 8-1

Since our residence is located near the cul de sac end of Oeste Avenue (a private road beyond the DWP pumping station on Oeste), we are very much concerned about how this would impact our access, the environmental impacts of the work, and the damage to road, trees and landscaping now in place on the road. As you must know, the road is extremely narrow at its opening from Avenida del Sol, and if one meets a vehicle coming downhill toward Avenida del Sol, it is necessary to back up onto Avenida del Sol in order for that vehicle to exit. This is extremely dangerous. 8-2

Once one gets onto the road (which gradually goes uphill), it remains very narrow until after the pumping station location. If cars are parked along the road, as sometimes is the case at the home of a neighbor, or if maintencance vehicles are present, it still is only one lane wide. Once one makes a sharp turn to the upper road, the road does widen, allowing for 2-way traffic. 8-3

If we understand this project correctly, the new DWP pumping station would be located uphill from Oeste Avenue (not a straight road, but a gently curving one). We cannot imagine how the ten homes on Oeste can be accessible during what sounds like a massive, lengthy project. Besides the regular concerns for our own access, and that of the service calls, mail, trash pickup, family, guests,etc., we are most worried about emergency access. After expressing that concern to Mr. Howe, we were faced with a scary situation on Monday afternoon of this week, when Mr. Carson, age 90, exhibited stroke symptoms. The response was perhaps overly cautious: two large fire engines and a rescue unit all arrived! Because there is no turnaround available, all, including the unit carrying him , had to back all the way downhill to Avenida del Sol---very time consuming in an emergency. 8-4

After spending time in the hospital overnight, Mr. Carson was allowed to return home, but he has had other issues in the past, and may have others in the future, so this access issue does cause both of us considerable worry. 8-4 Cont.

There are ten residences along Oeste Avenue. Two are in the final stages of construction and will be for sale very soon. One other large residence on the road is listed for resale. We wonder if those sales can be made if there is a project of this scale looming ahead. There are currently some aesthetic road improvements being made to the upper road, and we assume those would need to be redone. 8-5

We all are accustomed to some inconveniences from the present pumping station and adjacent DWP equipment on the opposite side of the road, but this proposal sounds much more disruptive than we can even imagine. Our home was an original structure, dating back to 1929, when the only other homes were two small ones on the lower section of road. The city has allowed the newer structures to be built without adequate street width on the lower section of Oeste, and now we are facing this access problem on a daily basis. 8-6

In addition to the project itself, we wonder if there would be any changes to the existing pumping station and adjacent work areas, or whether the new station would only be supplemental to what now exists. We would like to know what the noise effects from both would be, as it seems that there are nighttime noises now coming from the present location. We need to see an environmental impact study regarding those issues. In addition, there is very poor maintenance of the grounds and landscaping around the existing facilities, and we would hope that more attention can be paid to those issues in the future. 8-7

Our little street has a congenial, alert group of neighbors who share the same concerns, and you will surely hear from others in addition to us.

We will appreciate your addressing these concerns by contacting us at your earliest convenience. 8-8

Thank you for your attention.

Sincerely yours,

Richard C. Carson
Richard C. Carson

Karlyn Kuper Carson
Karlyn Kuper Carson

3900 Oeste Avenue, Studio City, CA 91604
phone: 818/762-3809
e-mail: dickarcarson@aol.com

Response to Comment Letter 8
Richard C. Carson and Karlyn Kuper Carson
May 14, 2020

8-1 This comment states that the commenters had a telephone conversation with LADWP regarding the proposed project. The commenters state that they wish to express concerns and to obtain further information regarding the project.

This comment is introductory in nature and does not raise a specific concern or question regarding the adequacy of the environmental impact analysis in the IS/MND. The concerns and questions raised throughout the letter are addressed in Responses 8-2 through 8-8 below. No further response is necessary.

8-2 This comment expresses concerns regarding access along Oeste Avenue; the environmental impacts of the project; and potential damages to the road, trees, and landscaping along the road. The comment further states that Oeste Avenue is narrow, with capacity for only one vehicle to travel along the road at a time.

For responses to concerns regarding access along Oeste Avenue during proposed project construction and the narrow characteristics of this roadway, see Responses 6-1, 6-2, 6-5, and 7-1. Regarding environmental impacts, the potential impacts of the project on the environment have been analyzed and disclosed in this IS/MND, pursuant to CEQA. As described throughout the IS/MND, the proposed project would result in potentially significant environmental impacts; however, in all cases, mitigation measures have been identified that would reduce potential impacts to below a level of significance. Regarding damages to the roadway, areas along Oeste Avenue where open trenching is proposed would be repaved once the new pipeline has been installed. Potential impacts to trees along Oeste Avenue are described in Section 3.4 of the IS/MND. Several trees may need to be removed to accommodate the proposed project. Additional trees could be indirectly impacted due to construction activities within tree protection zones. Any protected trees that are removed would be replaced in accordance with the tree replacement plan outlined in MM-BIO-2. Indirect impacts to the trees that would remain would be addressed through tree protection measures required by the City-issued tree removal permit. As such, effects to trees would be addressed through City permit provisions, as well as implementation of MM-BIO-2. Effects to ornamental landscaping are not generally considered significant environmental impacts under CEQA; however, work sites would be returned to their existing conditions to the extent practicable, once construction at a particular location is complete.

8-3 This comment describes the narrowness of Oeste Avenue.

See Responses 6-1 and 6-2, which also address concerns regarding access and construction along Oeste Avenue.

8-4 This comment expresses concerns regarding emergency access during construction.

See Response 6-1, which discusses emergency access along Oeste Avenue during construction.

8-5 This comment expresses concerns regarding home sales along Oeste Avenue leading up to project construction. The comment also states that aesthetic road improvements have been completed on the upper end of Oeste Avenue and that those improvements would need to be redone due to the proposed project.

Home sales and property values are not considered impacts to the environment under CEQA. As such, no further response regarding home sales and property values is required for the purposes of this Final IS/MND. As stated in Response 8-2, construction work sites along the project alignment would be returned to their existing conditions to the extent practicable, once construction at a particular location is complete.

8-6 This comment expresses concerns regarding disruptions from the proposed project. The comment states that newer homes along Oeste Avenue do not have adequate street width and that access problems are faced on a daily basis.

See Response 6-2, which addresses concerns regarding environmental impacts along Oeste Avenue. As described in Response 6-2, where significant impacts have been identified, mitigation measures would be incorporated to reduce those effects to below a level of significance. If the project is approved by LADWP decision makers, LADWP would ensure that residents in the project area are well informed leading up to construction. For the purposes of coordinating construction activities with the neighborhood surrounding the project alignment, LADWP would conduct separate outreach and notification processes, particularly closer to the start of construction. Furthermore, implementation of MM-TRAF-1 would require LADWP to provide an access plan for residents and emergency vehicles along Oeste Avenue. LADWP would issue resident passes as necessary.

8-7 This comment asks whether there would be any changes to the existing pumping station and adjacent work areas. The comment also expresses concerns regarding noise effects associated with the pumping station, and the commenter requests to see an environmental impact study regarding those issues.

The existing Coldwater Canyon Pump Station would undergo interior improvements as part of the proposed project. The existing structure would remain in place; a new pump station would not be constructed under the proposed project. Another project component would involve installation of a new flow control station vault on the LADWP-owned property located at 3380 Coldwater Canyon Avenue (which is at the southern/upper end of Oeste Avenue). The vault would be set into a slope on this property and would only be partially aboveground.

The noise impacts of the Coldwater Canyon Pump Station improvements and the new flow control station vault have been analyzed under CEQA in Section 3.13 (Noise) in the IS/MND. Construction impacts were determined to be less than significant with mitigation, and operational impacts were determined to be less than significant. With regards to the Coldwater Canyon Pump Station improvements, as stated in Section 3.13, the improvements would include replacing four existing pumps with new pumps. The new pumps would have slightly reduced horsepower ratings relative to the existing pumps that currently operate within the pump station. As such, noise produced by the new pumps would be similar to or less than noise produced by the existing pumps. Additionally, consistent with existing conditions, the pumps are located within an enclosed building. With regards to the proposed flow control station vault, noise would be produced within the vault from the operation of valves and piping. However, operational noise would be shielded and reduced since the vault would be partially buried belowground. Additionally, the vault would be constructed with thick walls, insulation, and sound attenuation features. As such, any noise experienced outside the vault would be minimal to negligible. Therefore, proposed aboveground appurtenant equipment associated with the project (including the Coldwater Canyon Pump Station improvements and the new flow control station vault) would not contribute to a notable change in the noise environment when compared to existing conditions.

This comment also states that the grounds and landscaping around the existing facilities on Oeste Avenue are poorly maintained. The commenter expresses hope that more attention could be paid to those issues in the future.

As stated above, the proposed project would involve interior improvements only at the existing Coldwater Canyon Pump Station. Installation of a new flow control station vault at the LADWP-owned property located at 3380 Coldwater Canyon Avenue would involve disturbance to existing vegetation on the property. Any protected trees that are removed from that property would be replaced per mitigation measure MM-BIO-2. MM-BIO-2 requires replacement trees to be monitored after planting, to ensure success.

8-8 This comment concludes the letter, stating that neighborhood along Oeste Avenue is alert and shares similar concerns as those expressed in this letter.

Letters received from other residents within the vicinity of the project alignment have been addressed above (see Response to Comment Letters 5, 6, and 7). If the project is approved by LADWP decision makers, LADWP would ensure that residents in the project area are well informed leading up to construction. For the purposes of coordinating construction activities with the neighborhood surrounding the project alignment, LADWP would conduct separate outreach and notification processes, particularly closer to the start of construction.

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Comment Letter 9

From: Howe, James
To: "Evan Kransdorf"
Subject: RE: [EXTERNAL] Trunk line project
Date: Wednesday, April 22, 2020 8:56:00 AM

Good morning Mr. Kransdorf,

Thank you for your comments regarding this project. Construction for this project is tentatively scheduled to begin in November 2021 and will continue until May 2023 (a duration of approximately a year and a half).

Regarding traffic concerns during construction, LADWP will develop and implement a traffic control plan that result in the least impacts to the levels of service in the construction area. "Pipe jacking," one of the construction methods, will be used at the intersection of Ventura Blvd. and Coldwater Canyon Ave. Pipe jacking is a tunneling method that limits disruptions to intersections, as it does not involve actual digging at the intersection, but tunnels under the intersection.

Please feel free to reach out if you have any additional questions regarding this project or would like to comment further. Thank you and stay safe and healthy.

Best,

James

James R. Howe, Environmental Specialist
Environmental Planning and Assessment
Los Angeles Department of Water and Power
111 N. Hope St., Room 1044
Los Angeles, CA 90012
Office: 213-367-0414

-----Original Message-----
From: Evan Kransdorf [mailto:evan.kransdorf@gmail.com]
Sent: Tuesday, April 21, 2020 5:58 PM
To: Howe, James
Subject: [EXTERNAL] Trunk line project

EXTERNAL EMAIL! This email was generated from a non-LADWP address. If any links exist, do not click/open on them unless you are 100% certain of the associated site or source. ALWAYS hover over the link to preview the actual URL/site and confirm its legitimacy.

Hello,

I live in Studio City and received the notice re: city trunk lint south unit 5 phase II and unit 6 project.

When will this project start and finish?

How will traffic at Ventura and Coldwater be managed?

Thank you, Evan

Sent from my iPhone

9-1

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Response to Comment Letter 9
Evan Kransdorf
April 21, 2020

9-1 This comment consist of a several questions about the project. LADWP responded to these questions via email on April 22, 2020, as shown in the email above. No further comments or questions were received from the commenter.

This letter does not state a specific concern regarding the adequacy of the environmental impact analysis in the IS/MND, and LADWP has responded to the commenter's inquiries regarding the project. No further response is necessary.

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Comment Letter 10

From: Meng Heu
To: Howe, James
Subject: [EXTERNAL] SCH Number 2020040184
Date: Tuesday, May 19, 2020 1:30:07 PM

EXTERNAL EMAIL! This email was generated from a non-LADWP address. If any links exist, do not click/open on them unless you are 100% certain of the associated site or source. ALWAYS hover over the link to preview the actual URL/site and confirm its legitimacy.

The State Clearinghouse would like to inform you that our office will be transitioning from providing a hard copy of acknowledging the close of review period on your project to electronic mail system.
Please visit: https://ceqanet.opr.ca.gov/2020040184/2 for full details about your project and if any state agencies submitted comments by close of review period (note: any state agencies in bold, submitted comments and are available).

This email acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please email the State Clearinghouse at state.clearinghouse@opr.ca.gov if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

10-1

To view your submission, use the following link.
https://ceqasubmit.opr.ca.gov/Document/Index/261143/2

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Response to Comment Letter 10

State Clearinghouse and Planning Unit
Governor's Office of Planning and Research
May 19, 2020

10-1 This letter acknowledges the closure of the state public review period for the IS/MND and identifies how to obtain comment letters submitted by state agencies online. The letter also states that LADWP has complied with the State Clearinghouse review requirements for draft environmental documents pursuant to CEQA.

LADWP has visited the website referenced by the commenter and confirmed that the comment letter from Caltrans was submitted to LADWP during the public review period for the IS/MND. The comment letter from Caltrans and responses to those comments are included within this Final IS/MND as Comment Letter 1 and Response to Comment Letter 1.

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Comment Letter 11

COUNTY OF LOS ANGELES
FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294
(323) 881-2426
www.fire.lacounty.gov

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THIRD DISTRICT

JANICE HAHN
FOURTH DISTRICT

KATHRYN BARGER
FIFTH DISTRICT

May 21, 2020

James Howe, Analyst
Los Angeles Department of Water and Power
Planning Department
111 North Hope Street
Los Angeles, CA 90012

Dear Mr. Howe:

NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION, "CITY TRUNK LINE SOUTH UNIT 5 PHASE II AND UNIT 6 PROJECT," THE PROJECT WOULD IMPROVE CAPACITY, RELIABILITY, AND FLEXIBILITY IN THE WATER SYSTEM, AND WOULD COMPLETE THE LADWP'S SIX-PHASE PLAN TO REPLACE THE EXISTING LOS ANGELES CITY TRUNK LINE, WHICH CONNECTS THE LOS ANGELES AQUEDUCT FILTRATION PLANT TO THE FRANKLIN RESERVOIR, LOS ANGELES, FFER 2020002524

The Notice of Intent to Adopt a Mitigated Negative Declaration has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

PLANNING DIVISION:

The subject property is entirely within the City of Los Angeles, which is not a part of the emergency response area of the Los Angeles County Fire Department (also known as the Consolidated Fire Protection District of Los Angeles County). Therefore, this project does not appear to have any impact on the emergency responsibilities of this Department.

11-1

For any questions regarding this response, please contact Loretta Bagwell, Planning Analyst, at (323) 881-2404 or Loretta.Bagwell@fire.lacounty.gov.

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS
ARTESIA
AZUSA
BALDWIN PARK
BELL
BELL GARDENS
BELLFLOWER
BRADBURY
CALABASAS
CARSON
CERRITOS
CLAREMONT
COMMERCE
COVINA
CUDAHY
DIAMOND BAR
DUARTE
EL MONTE
GARDENA
GLENDORA
HAWAIIAN GARDENS
HAWTHORNE
HERMOSA BEACH
HIDDEN HILLS
HUNTINGTON PARK
INDUSTRY
INGLEWOOD
IRWINDALE
LA CANADA-FLINTRIDGE
LA HABRA
LA MIRADA
LA PUENTE
LAKEWOOD
LANCASTER
LAWNDALE
LOMITA
LYNWOOD
MALIBU
MAYWOOD
NORWALK
PALMDALE
PALOS VERDES ESTATES
PARAMOUNT
PICO RIVERA
POMONA
RANCHO PALOS VERDES
ROLLING HILLS
ROLLING HILLS ESTATES
ROSEMEAD
SAN DIMAS
SANTA CLARITA
SIGNAL HILL
SOUTH EL MONTE
SOUTH GATE
TEMPLE CITY
WALNUT
WEST HOLLYWOOD
WESTLAKE VILLAGE
WHITTIER

LAND DEVELOPMENT UNIT:

The County of Los Angeles Fire Department's Land Development Unit has no requirements for the proposed work. Please submit plans to the County of Los Angeles Fire Department's Engineering Section for review and approval.

Additional comments pending the information returned by the applicant for Fire Department plan check; presently all outstanding comments have been addressed via plan check.

For any questions regarding the report, please contact Joseph Youman at (323) 890-4243 or Joseph.Youman@fire.lacounty.gov.

11-2

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

Under the Los Angeles County Oak tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage or encroach into the protected zone of any tree of the Oak genus which is 25 inches or more in circumference (eight inches in diameter), as measured 4 1/2 feet above mean natural grade.

If Oak trees are known to exist in the proposed project area further field studies should be conducted to determine the presence of this species on the project site.

The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

For any questions regarding this response, please contact Forestry Assistant, Joseph Brunet at (818) 890-5719.

11-3

HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division of the Los Angeles County Fire Department has no comments or requirements for the project at this time.

Please contact HHMD senior typist-clerk, Perla Garcia at (323) 890-4035 or Perla.garcia@fire.lacounty.gov if you have any questions.

If you have any additional questions, please contact this office at (323) 890-4330.

11-4

James Howe, Analyst
May 21, 2020
Page 3

Very truly yours,

RONALD M. DURBIN, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

RMD:ac

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Response to Comment Letter 11

Ronald M. Durbin, Chief, Forestry Division
County of Los Angeles Fire Department
May 21, 2020

11-1 This comment states that the project site is entirely within the City of Los Angeles, which is not a part of the emergency response area of the Los Angeles County Fire Department (LACFD). The comment states that the project does not appear to have any impact on emergency responsibilities of the LACFD.

LADWP has noted that the proposed project is not within LACFD's emergency response area. No further response is necessary.

11-2 This comment states that LACFD's Land Development Unit has no requirements for the proposed work. As described above, the proposed project is not within LACFD's response area. LADWP would coordinate with the City of Los Angeles Fire Department regarding the project, as needed. No further response is necessary.

11-3 This comment lists the statutory responsibilities of the Forestry Division of LACFD. The comment states that potential impacts in the categories of erosion control, watershed management, rare and endangered species, vegetation, fuel modification in Very High Fire Hazard Severity Zones, archaeological and cultural resources, and the County Oak Tree Ordinance should be addressed. The comment further states that under the Los Angeles County Oak Tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage, or encroach into the protected zone of any tree of the Oak genus that is 25 inches or more in circumference, as measured 4.5 feet above mean natural grade. The comment states that if oak trees are known to exist in the proposed project area, further field studies should be conducted to determine the presence of oak species on the project site.

Potential impacts in the environmental categories listed by the Forestry Division have been addressed in the IS/MND. Erosion is discussed in Section 3.7, water and water quality is discussed in 3.10, special-status species and vegetation are discussed in Section 3.4, fire hazards are discussed in Section 3.20, archaeological and cultural resources are discussed in Section 3.5, and oak trees are discussed in Section 3.4. No significant, unavoidable impacts were identified in these categories.

Section 3.4(e) specifically discusses whether the proposed project would conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. The discussion covers the City of Los Angeles Protected Tree Ordinance. The Los Angeles County Oak Tree Ordinance applies to unincorporated areas of the County. The proposed project would take place entirely within the

City of Los Angeles and, therefore, would not be subject to the Los Angeles County Oak Tree Ordinance. As identified in Section 3.4, City-protected trees would be impacted by the project; however, mitigation has been set forth that would reduce these impacts to below a level of significance.

11-4 This comment states that the Health Hazardous Materials Division of the LACFD has no comments regarding the project. This comment also provides contact information for the fire department. No response is required.

6 MITIGATION MONITORING AND REPORTING PROGRAM

CEQA requires that public agencies adopting MNDs take affirmative steps to determine that approved mitigation measures are implemented subsequent to project approval. The lead agency must adopt a reporting and monitoring program for the mitigation measures incorporated into a project or included as conditions of approval. The program must be designed to ensure compliance with the MND during project implementation (California Public Resources Code, Section 21081.6(a)(1)).

The Mitigation Monitoring and Reporting Program (MMRP) will be used by LADWP as lead agency to ensure compliance with adopted mitigation measures identified in this MND. LADWP, as lead agency pursuant to the CEQA Guidelines, will ensure that all mitigation measures are carried out.

Implementation of the mitigation measures would reduce impacts to below a level of significance for biological resources, cultural resources, geology and soils, hazards and hazardous materials, noise, transportation, and tribal cultural resources.

The remainder of this MMRP consists of a table that identifies the mitigation measures by resource area. Table 6-1 identifies the mitigation monitoring and reporting requirements, including the timing of verification (prior to, during, or after construction) and the responsible party. Space is provided for sign-off following completion/implementation of the mitigation measure.

Table 6-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	Biological Resources					
MM-BIO-1	**Nesting Bird Avoidance.** Initiation of construction activities (i.e., initial vegetation clearing) should avoid the migratory bird nesting season (February 1 through August 31), to reduce any potential significant impact to birds that may be nesting on the project site. If construction activities must be initiated during the migratory bird-nesting season, an avian nesting survey of the project site and contiguous habitat within 500 feet of all impact areas must be conducted for protected migratory birds and active nests. The avian nesting survey shall be performed by a qualified wildlife biologist within 72 hours prior to the start of 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 species' sensitivity to disturbance (typically 50 feet for common, urban-adapted species, 300 feet for other passerine species, and 500 feet for raptors and special-status species). The nest area shall be avoided until the nest is vacated and the juveniles have fledged. The nest area shall be demarcated in the field with flagging and stakes or construction fencing. A qualified biologist (with the ability to stop work) shall serve as a construction monitor	Prior to the start of construction; during construction (if an active nest is found)	Los Angeles Department of Water and Power (LADWP)			

Table 6-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	during those periods when construction activities will occur near active nest areas to ensure that no inadvertent impacts on these nests occur.					
MM-BIO-2	**Tree Replacement.** Based on removal of eight protected trees from the project site, a minimum of 32 (20 southern California black walnuts and 12 coast live oak) 15-gallon-size protected trees of like species are required to be planted by the Los Angeles Department of Water and Power (LADWP). The specific location of individual mitigation tree plantings on site shall be addressed in a mitigation planting plan or landscape design plan prepared for the site. It is estimated that all of the required mitigation trees can be accommodated within the LADWP-owned property located at 3380 Coldwater Canyon Avenue. The mitigation requirement and the approved tree replacement mitigation ratio is at the discretion of the City and subject to the final conditions of the City-issued tree removal permit. All tree plantings will be subject to a five-year monitoring effort by an independent third-party certified arborist. This monitoring effort will consider growth, health, and condition of the subject trees in order to evaluate the proposed project's success. The monitoring effort may result in a recommendation of remedial actions should any of the tree plantings exhibit poor or declining health. In an effort to maintain minimum mitigation tree quantities following the five-year monitoring period, it is recommended that over-	Prior to, during, and after construction	LADWP			

Table 6-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	planting be done for the required mitigation trees by 50%, resulting in a mitigation planting of 48, 15-gallon-size protected trees of like species.					
	Cultural Resources					
MM-CUL-1	**Inadvertent Discovery of Archaeological Resources.** In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the proposed 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 under the California Environmental Quality Act (14 CCR 15064.5(f); California PRC Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, data recovery, and/or monitoring may be warranted.	During construction	LADWP			
MM-CUL-2	**Inadvertent Discovery of Human Remains.** In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the County Coroner shall be immediately notified of the discovery and a qualified archaeologist will be contacted. No further excavation or disturbance of the project site or any nearby area reasonably suspected to overlie adjacent remains shall	During construction	LADWP			

Table 6-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	occur until the County Coroner has determined, within two working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the Native American Heritage Commission in Sacramento within 24 hours. In accordance with California Public Resources Code, Section 5097.98, the Native American Heritage Commission must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant shall complete their inspection within 48 hours of being granted access to the site. The most likely descendant would then determine, in consultation with the property owner, the disposition of the human remains. Upon discovery, a qualified archaeologist will be retained to ensure proper implementation of the treatment agreed upon by the most likely descendant and property owner.					
		Geology and Soils				
MM-GEO-1	**Paleontological Monitoring Program.** Prior to commencement of any grading activity for the project, the Los Angeles Department of Water and Power (LADWP) shall retain a qualified paleontologist per the Society of Vertebrate Paleontology (2010) guidelines. The paleontologist shall prepare a Paleontological Resources Impact Mitigation Program for the proposed project. Following the guidelines of the Society of Vertebrate	Prior to and during construction	LADWP			

Table 6-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	Paleontology (2010), the Paleontological Resources Impact Mitigation Program shall outline requirements for preconstruction meeting attendance and worker environmental awareness training, where monitoring is required within the project area based on construction plans and/or geotechnical reports, procedures for adequate paleontological monitoring and discoveries treatment, and paleontological methods (including sediment sampling for microvertebrate fossils), reporting, and collections management. The qualified paleontologist shall attend the preconstruction meeting and be on site (or a qualified paleontological monitor per the SVP [2010] guidelines) during all rough grading and other significant ground-disturbing activities in previously undisturbed Miocene marine (Modelo Formation and Monterey Formation) deposits. These deposits may be encountered at any depth below any fill materials (i.e., road base). In addition, the qualified paleontologist or paleontological monitor shall monitor below a depth of 5 feet below the ground surface in areas underlain by Quaternary alluvium. The specific monitoring locations will be detailed in the Paleontological Resources Impact Mitigation Program. In the event that paleontological resources (e.g., fossils) are unearthed during ground-disturbing activities, the qualified paleontologist will temporarily halt and/or divert the activity to allow recovery of paleontological resources. Once documentation and collection of the find is completed, the					

Table 6-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	monitor will allow work to recommence in the area of the find. Per the Society of Vertebrate Paleontology (2010) guidelines, if 50% of excavations in a single geological unit has occurred with no fossil recovery, reduction or termination of paleontological monitoring can be implemented at the qualified paleontologist's discretion.					
	Hazards and Hazardous Materials					
MM-HAZ-1	**Hazardous Materials Contingency Measures.** Prior to construction, the Los Angeles Department of Water and Power (LADWP) and/or its contractor shall implement contingency measures that address potential impacts in soil, soil vapor, and groundwater from releases at the sites listed in Tables 3.9-1 and 3.9-2. These measures shall include but are not limited to the following: • Identification of known areas of concern. • Training procedures for identification of contamination. • Management, removal, disposal, and reporting of contaminated soils and/or groundwater in accordance with local and state regulations. • Health and safety measures, including periodic work breathing zone monitoring, if appropriate, and AQMD Rule 1166 monitoring for volatile organic compounds (using a handheld organic vapor analyzer), in the event impacted soils are encountered during excavation activities. LADWP and/or its contractor shall implement these contingency measures during construction activities for the proposed project. If encountered, asbestos cement shall be	Prior to and during construction	LADWP			

Table 6-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	handled and disposed of in a manner that keeps the material in predominantly whole pieces to be considered nonfriable and in a manner consistent with United States Environmental Protection Agency requirements and SCAQMD Rule 1403. Samples shall be collected for laboratory analysis of asbestos prior to disposal, consistent with United States Environmental Protection Agency National Emissions Standard for Hazardous Air Pollutants regulations.					
	Noise					
MM-NOI-1	**Construction Noise Reduction.** The Los Angeles Department of Water and Power (LADWP) and/or its construction contractor shall comply with the following measures during construction: 1. Construction activities shall not occur between the hours of 9:00 pm and 7:00 am Monday through Friday, 6:00 pm and 8:00 am on Saturday, or on Sundays or national holidays. In the event that construction is required to extend beyond these times, extended hours permits shall be required. 2. Pumps and associated equipment (e.g., portable generators etc.) shall be situated and configured so as to minimize noise at nearby noise-sensitive receivers. 3. Where possible, staging of construction equipment shall be situated at least 30 feet from noise- or vibration-sensitive land uses. 4. All noise-producing equipment and vehicles using internal combustion engines shall be equipped with mufflers; air-inlet silencers where appropriate; and any other shrouds,	During construction	LADWP			

Table 6-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	shields, or other noise-reducing features in good operating condition that meet or exceed original factory specification. Mobile or fixed "package" equipment (e.g., arc-welders, air compressors) shall be equipped with shrouds and noise control features that are readily available for that type of equipment. 5. All mobile or fixed noise-producing equipment used for the project that are regulated for noise output by a local, state, or federal agency shall be in compliance with regulations. 6. Idling equipment shall be kept to a minimum and moved as far as practicable from noise-sensitive land uses. 7. Electrically powered equipment shall be used instead of pneumatic or internal combustion powered equipment, where feasible. 8. Mobile equipment staging, parking, and maintenance areas shall be located as far as practicable from noise-sensitive receptors. 9. The use of noise-producing signals, including horns, whistles, alarms, and bells, shall be used for safety warning purposes only.					
MM-NOI-2	**Notification.** Effective communication with local residents shall be maintained prior to and during construction. Specifically, the Los Angeles Department of Water and Power (LADWP) shall inform local residents of the schedule, duration, and progress of the construction. Additionally, residents shall be provided contact information for noise- or vibration-related complaints.	Prior to and during construction	LADWP			

Table 6-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	Transportation					
MM-TRAF-1	**Construction Traffic Control Plan.** Prior to the start of any construction-related work or encroachment, the Los Angeles Department of Water and Power (LADWP) shall develop and implement a Traffic Control Plan. The Traffic Control Plan shall include but will not be limited to the following measures: • All construction activities shall be conducted in accordance with the Greenbook, traffic control plans designed by the City of Los Angeles Department of Transportation and LADWP, and the *Work Area Traffic Control Handbook Manual* to allow the least impacts to levels of service, traffic safety, and emergency access to the site during construction. • LADWP shall install temporary equipment necessary for safe and efficient traffic control including changeable message signs, delineators, arrow boards, flagmen, etc. • LADWP shall provide advance notification of the proposed construction work area limits and lane closure times to transit services and all local emergency service providers (police, fire, ambulance, etc.). • Qualified flagmen shall be posted at each work site to direct construction traffic entering and exiting the site and/or to direct large construction-related vehicles to/from the work areas. • Two-way travel shall always be provided along Coldwater Canyon Avenue throughout construction. Where two-way travel may not be possible along Oeste Avenue, LADWP shall provide an access plan for residents and emergency vehicles. • The Traffic Control Plans shall also include detours and safe passage areas for bicyclists and pedestrians in the impacted work areas.	Prior to and during construction	LADWP			

Table 6-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
Tribal Cultural Resources						
MM-TCR-1	**Worker Environmental Awareness Program (WEAP).** All construction workers shall undergo Worker Environmental Awareness Program (WEAP) training conducted by a qualified archaeologist to ensure that any unanticipated archaeological or tribal cultural discoveries are treated appropriately. The WEAP training will provide specific details on the kinds of archaeological and/or tribal cultural resources materials that may be identified during ground disturbing activities.	Prior to construction	LADWP			
MM-TCR-2	**Native American Monitoring.** Tribal representatives who have participated in Native American consultation for the project shall be contacted prior to the start of construction activities to determine the appropriate Native American monitor(s), the phases and locations of project ground-disturbing activities that would involve monitoring, and the frequency and duration of monitoring throughout construction. Should any tribal cultural resources be encountered, the Native American monitor(s) will have the authority to request construction to cease within 60 feet of the discovery to assess and document potential finds as outlined in Mitigation Measure MM-TCR-3.	Prior to and during construction	LADWP			
MM-TCR-3	**Inadvertent Discovery of Tribal Cultural Resources.** Should a potential tribal cultural resource be encountered, construction activities near the discovery shall be temporarily halted within 60 feet of the discovery. The Los Angeles Department of Water and Power (LADWP) along with the Native American monitor(s) shall discuss the significance of the discovery. If the potential resource is archaeological in nature, appropriate management requirements shall be implemented as outlined in Mitigation Measure MM-CUL-1. If the resource is determined to be a potential tribal cultural resource (as defined by PRC, Section	During construction	LADWP			

Table 6-1. Mitigation Monitoring and Reporting Program

Number	Mitigation Measure	Time Frame for Implementation	Responsible Monitoring Agency	Verification of Compliance		
				Initials	*Date*	*Remarks*
	21074), LADWP shall, in good faith, consult with the tribes who have participated in consultation under Assembly Bill 52 on the disposition and treatment of the resource. Depending on the nature of the resource and tribal recommendations, review by a qualified archaeologist may be required. Implementation of proposed recommendations will be made based on the determination of LADWP that the approach is reasonable and feasible and a good faith effort has been made to find agreement with consulting tribes. All activities shall be conducted in accordance with regulatory requirements.					