

# APPENDIX A

IS/NOP, NOC, and Scoping Letters



Los Angeles Department of Water & Power



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DOCUMENT FILED City Clerk's Office No. NP-17-006-WP Certified by MAH Date 11/22/17

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT

Date: December 1, 2017 To: Affected Agencies, Organizations and Interested Persons Subject: Notice of Preparation of a Draft Environmental Impact Report for the De Soto Tanks Project

2017 337327 FILED Nov 29 2017 Dean C. Logan, Registrar - Recorder/County Clerk Electronically signed by DEMETRIA ATRINS

This Notice of Preparation (NOP) has been prepared to notify agencies and interested parties that the Los Angeles Department of Water and Power (LADWP), as the Lead Agency, will prepare an Environmental Impact Report (EIR) pursuant to the California Environmental Quality Act (CEQA) for the proposed De Soto Tanks Project.

LADWP is requesting input from interested individuals, organizations, and agency representatives regarding the scope and content of the environmental information to be included in the EIR for the proposed project. In accordance with CEQA, LADWP requests that agencies review the project description provided in this NOP and provide comments on environmental issues related to the statutory responsibilities of the agency. A description of the project, location, and preliminary determination of the environmental resource topics to be addressed in the EIR are contained in the Initial Study for the De Soto Tanks Project.

Project Location:

The proposed project is located in the City of Los Angeles within the County of Los Angeles, at 11200 De Soto Avenue, in the Chatsworth community. The project site is generally bounded by the 118 Freeway to the north, De Soto Avenue to the west, and Rinaldi Street to the south and east. Adjacent to the property on the east side, is an undeveloped, privately-owned parcel of land that would be acquired to facilitate construction of the proposed project. The project is located in Council District No. 12 and in the Chatsworth Neighborhood Council area.

Project Description:

The De Soto Tanks Project is a water storage project to provide additional local storage and increase operational effectiveness, reliability, and flexibility; system redundancy; and emergency supply to the West San Fernando Valley.

The project would functionally replace the existing 3-million gallon (MG) De Soto



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Reservoir, with two buried, pre-stressed circular concrete storage tanks immediately north of the existing reservoir site. The combined storage capacity upon completion of the new storage tanks would be approximately 20 MG.

The existing De Soto Reservoir, located in the northwestern area of the San Fernando Valley, was built in 1941. It has a base elevation of 1,100 feet above mean sea level and a high water level of 1,123 feet. In order to maintain appropriate operating pressure, the two proposed buried pre-stressed concrete tanks would have a base elevation of 1,100 feet, a high water level of 1,130 feet, and a top of tank elevation of 1,140 feet. Excavation at the proposed project site would be required to bury the tanks, which would be approximately 240 feet in diameter and 40 feet in height, below existing grade level in order to achieve these target elevations.

The construction of these tanks will require a temporary excavation to a depth of approximately 50 feet. This excavation will likely include 2:1 (horizontal:vertical) slope cuts and vertical walls of up to 40 feet with tie-backs as part of the shoring system. Additional geotechnical investigation is being conducted to determine the final location of the tanks.

Construction of the De Soto Tanks Project would also require the installation of approximately 2,500 linear feet of new inlet pipelines that would connect to the LADWP Rinaldi Trunk Line and outlet pipelines that would connect to the LADWP De Soto Trunk Line and Granada Trunk Line. In addition, a new pressure regulator station is needed to reduce the water pressure coming via Rinaldi Trunk Line from Los Angeles Aqueduct Filtration Plant UV Plant, 1,190-foot high water, to the De Soto Tanks which will have a 1,130-foot high water.

Upon completion of the De Soto Tanks, the existing De Soto Reservoir will be demolished and a new De Soto Pump Station will also be constructed to pump water to the 1305-ft pressure zone. Currently, the 1305-ft pressure zone is supplied by the Van Norman Pump Station No. 2, which pumps water to the 1445-ft pressure zone and is regulated at the Granada TL at De Soto Reservoir Regulator Station to the 1305-ft pressure zone. The new De Soto Pump Station will reduce dependence on Van Norman Pump Station No. 2 and improve water quality by allowing for better cycling of the Kittridge Tanks in the 1305-ft pressure zone.

**Potential Environmental Impacts:**

Based on the Initial Study, the Project could have potentially significant environmental impacts in the following topic areas, which will be addressed in the EIR: Air Quality, Biological Resources, Cultural Resources, Greenhouse Gas Emissions, Hydrology and Water Quality, Noise, Transportation and Traffic, and Utilities and Service Systems.

**Scoping Meeting:**

LADWP will hold a scoping meeting to share information regarding the proposed project and environmental review process and to receive written comments about the scope and content of the environmental analysis to be addressed in the EIR. The LADWP

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Electronically signed by DEMETRIA ATKINS

encourages all interested individuals and organizations to attend this meeting. No decisions about the project will be made at the scoping meeting. The date, time, and location of the public scoping meeting are as follows:

Wednesday, January 17, 2018  
6:00PM  
Chatsworth Branch Library – Meeting Room  
21052 Devonshire Street  
Chatsworth, CA 91311



**Public Review and Comments:**

The public comment period for the NOP and review of the Initial Study will start on December 1, 2017, and end on January 31, 2018.

Please ensure that comments are postmarked or emailed on or before January 31, 2018.

The Initial Study is available for review at the locations listed below or may be accessed electronically and/or downloaded at the following website:

<http://www.ladwp.com/envnotices>.

Chatsworth Branch Public Library  
21052 Devonshire Street  
Chatsworth, CA 91311

Los Angeles Department of Water and Power  
Environmental Affairs  
111 N. Hope Street, Room 1044  
Los Angeles, CA 90012

Please mail or email your comments, and direct any questions to:

Brian Gonzalez  
Los Angeles Department of Water and Power  
Environmental Planning and Assessment  
111 North Hope Street, Room 1044  
Los Angeles, CA 90012  
(213) 367-2612  
[brian.gonzalez@ladwp.com](mailto:brian.gonzalez@ladwp.com)

Signature: Charles C. Holloway  
Charles C. Holloway, Manager of Environmental Planning and Assessment, LADWP

BG:rc

and certified copy of the record  
to the seal, imprinted in purple ink,  
of the Registrar-Recorder/County Clerk

NOV 29 2017

*Donna Lynn* REG. STRAT. RECORDER/COUNTY CLERK  
LOS ANGELES COUNTY, CALIFORNIA





**Notice of Completion & Environmental Document Transmittal**

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613  
 For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #
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**Project Title:** De Soto Tanks ProjectLead Agency: City of Los Angeles Department of Water & PowerContact Person: Charles HollowayMailing Address: 111 North Hope Street, Room 1044Phone: (213) 367-0285City: Los AngelesZip: 90012County: Los Angeles**Project Location:** County: Los Angeles City/Nearest Community: Chatsworth & Porter RanchCross Streets: De Soto Avenue/Rinaldi Street Zip Code: 91311Longitude/Latitude (degrees, minutes and seconds): 34 ° 271 ' \_\_\_\_\_ " N / -118 ° 587 ' \_\_\_\_\_ " W Total Acres: 20Assessor's Parcel No.: 2701003907, 2707001-904 and -019 Section: Oat Mtn Twp.: 2N Range: 16W Base: 8Within 2 Miles: State Hwy #: 118 Waterways: Browns Canyon WashAirports: N/A Railways: Metrolink Rail Line Schools: Sierra Canyon School**Document Type:**

CEQA:  NOP  Draft EIR NEPA:  NOI Other:  Joint Document  
 Early Cons  Supplement/Subsequent EIR  EA  Final Document  
 Neg Dec (Prior SCH No.) \_\_\_\_\_  Draft EIS  Other: \_\_\_\_\_  
 Mit Neg Dec Other: \_\_\_\_\_

**Local Action Type:**

General Plan Update  Specific Plan  Rezone  Annexation  
 General Plan Amendment  Master Plan  Prezone  Redevelopment  
 General Plan Element  Planned Unit Development  Use Permit  Coastal Permit  
 Community Plan  Site Plan  Land Division (Subdivision, etc.)  Other: \_\_\_\_\_

**Development Type:**

Residential: Units \_\_\_\_\_ Acres \_\_\_\_\_  
 Office: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_  Transportation: Type \_\_\_\_\_  
 Commercial: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_  Mining: Mineral \_\_\_\_\_  
 Industrial: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_  Power: Type \_\_\_\_\_ MW \_\_\_\_\_  
 Educational: \_\_\_\_\_  Waste Treatment: Type \_\_\_\_\_ MGD \_\_\_\_\_  
 Recreational: \_\_\_\_\_  Hazardous Waste: Type \_\_\_\_\_  
 Water Facilities: Type Storage Tanks MGD 2, 20MG tanks  Other: Demolition of De Soto Reservoir

**Project Issues Discussed in Document:**

Aesthetic/Visual  Fiscal  Recreation/Parks  Vegetation  
 Agricultural Land  Flood Plain/Flooding  Schools/Universities  Water Quality  
 Air Quality  Forest Land/Fire Hazard  Septic Systems  Water Supply/Groundwater  
 Archeological/Historical  Geologic/Seismic  Sewer Capacity  Wetland/Riparian  
 Biological Resources  Minerals  Soil Erosion/Compaction/Grading  Growth Inducement  
 Coastal Zone  Noise  Solid Waste  Land Use  
 Drainage/Absorption  Population/Housing Balance  Toxic/Hazardous  Cumulative Effects  
 Economic/Jobs  Public Services/Facilities  Traffic/Circulation  Other: \_\_\_\_\_

**Present Land Use/Zoning/General Plan Designation:**

Agricultural/A2-1 Agricultural Zone

**Project Description:** (please use a separate page if necessary)

The De Soto Tanks Project (proposed project) is a water storage project that is being proposed by the Los Angeles Department of Water and Power (LADWP). The project would functionally replace the existing 3-million-gallon (MG) De Soto Reservoir, located at 11200 De Soto Avenue, with two buried, pre-stressed circular concrete storage tanks immediately north of the existing reservoir site. The combined operating storage capacity upon completion of the new storage tanks would be approximately 20 MG. These tanks would provide additional local storage to increase operational effectiveness, reliability, and flexibility; system redundancy; and emergency supply to the West San Fernando Valley.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

## Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with an "X".  
If you have already sent your document to the agency please denote that with an "S".

<u>S</u> Air Resources Board	<u>X</u> Office of Historic Preservation
<u>    </u> Boating & Waterways, Department of	<u>    </u> Office of Public School Construction
<u>    </u> California Emergency Management Agency	<u>S</u> Parks & Recreation, Department of
<u>X</u> California Highway Patrol	<u>    </u> Pesticide Regulation, Department of
<u>S</u> Caltrans District #7	<u>X</u> Public Utilities Commission
<u>    </u> Caltrans Division of Aeronautics	<u>S</u> Regional WQCB #4
<u>    </u> Caltrans Planning	<u>X</u> Resources Agency
<u>    </u> Central Valley Flood Protection Board	<u>    </u> Resources Recycling and Recovery, Department of
<u>    </u> Coachella Valley Mtns. Conservancy	<u>    </u> S.F. Bay Conservation & Development Comm.
<u>    </u> Coastal Commission	<u>X</u> San Gabriel & Lower L.A. Rivers & Mtns. Conservancy
<u>    </u> Colorado River Board	<u>    </u> San Joaquin River Conservancy
<u>X</u> Conservation, Department of	<u>X</u> Santa Monica Mtns. Conservancy
<u>    </u> Corrections, Department of	<u>X</u> State Lands Commission
<u>    </u> Delta Protection Commission	<u>    </u> SWRCB: Clean Water Grants
<u>    </u> Education, Department of	<u>X</u> SWRCB: Water Quality
<u>X</u> Energy Commission	<u>    </u> SWRCB: Water Rights
<u>S</u> Fish & Game Region #5	<u>    </u> Tahoe Regional Planning Agency
<u>    </u> Food & Agriculture, Department of	<u>S</u> Toxic Substances Control, Department of
<u>X</u> Forestry and Fire Protection, Department of	<u>X</u> Water Resources, Department of
<u>    </u> General Services, Department of	
<u>    </u> Health Services, Department of	<u>S</u> Other: <u>See attached agency distribution</u>
<u>    </u> Housing & Community Development	<u>    </u> Other: _____
<u>X</u> Native American Heritage Commission	

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### Local Public Review Period (to be filled in by lead agency)

Starting Date December 1, 2017 Ending Date January 31, 2018

### Lead Agency (Complete if applicable):

Consulting Firm: <u>Dudek</u>	Applicant: <u>Los Angeles Department of Water &amp; Power</u>
Address: <u>38 North Marengo Avenue</u>	Address: <u>111 North Hope Street, Room 1044</u>
City/State/Zip: <u>Pasadena, CA 91101</u>	City/State/Zip: <u>Los Angeles, CA 90012</u>
Contact: <u>Nicole Colbeigh, Senior Project Manager</u>	Phone: <u>(213) 367-2612</u>
Phone: <u>(626) 204-9829</u>	

Signature of Lead Agency Representative: \_\_\_\_\_ Date: \_\_\_\_\_

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.



# INITIAL STUDY

## DE SOTO TANKS PROJECT

### LOS ANGELES DEPARTMENT OF WATER AND POWER

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

WITH ASSISTANCE FROM

**DUDEK**

38 North Marengo Avenue  
Pasadena, California 91101

NOVEMBER 2017



# TABLE OF CONTENTS

SECTION	PAGE
ACRONYMS AND ABBREVIATIONS.....	III
1 INTRODUCTION .....	1
1.1 Project Overview.....	1
1.2 California Environmental Quality Act.....	1
1.3 Project Location .....	1
1.4 Environmental Setting.....	1
1.5 References.....	2
2 PROJECT DESCRIPTION .....	7
2.1 Background .....	7
2.2 Construction.....	7
2.3 Operations.....	8
2.4 Discretionary Approvals Required for the Project .....	8
3 INITIAL STUDY CHECKLIST .....	11
3.1 Aesthetics.....	17
3.2 Agriculture and Forestry Resources .....	19
3.3 Air Quality .....	21
3.4 Biological Resources .....	24
3.5 Cultural Resources.....	29
3.6 Geology and Soils.....	31
3.7 Greenhouse Gas Emissions.....	35
3.8 Hazards and Hazardous Materials .....	36
3.9 Hydrology and Water Quality.....	40
3.10 Land Use and Planning.....	45
3.11 Mineral Resources .....	47
3.12 Noise.....	48
3.13 Population and Housing.....	50
3.14 Public Services .....	51
3.15 Recreation.....	53
3.16 Transportation and Traffic .....	54
3.17 Tribal Cultural Resources.....	57
3.18 Utilities and Service Systems.....	59
3.19 Mandatory Findings of Significance .....	62
4 REPORT PREPARERS.....	65

# TABLE OF CONTENTS (CONTINUED)

PAGE

## FIGURES

1	Regional Map .....	3
2	Vicinity Map .....	5
3	Site Plan.....	9

## ACRONYMS AND ABBREVIATIONS

Acronym/ Abbreviation	Definition
ACOE	Army Corps of Engineers
ALUC	Airport Land Use Commission
APN	Assessor's Parcel Number
AQMP	Air Quality Management Plan
BOE	Bureau of Engineering
CAP	Climate Action Plan
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CNDDB	California Natural Diversity Data Base
CNPS	California Native Plant Society
CO	carbon monoxide
CO <sub>2</sub> E	carbon dioxide equivalent
CR	California rare
CRPR	California Rare Plant Rank
CWA	Clean Water Act
EIR	Environmental Impact Report
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FT	federally threatened
GHG	greenhouse gas
IS	Initial Study
LADWP	Los Angeles Department of Water and Power
MG	million-gallon
MT	metric tons
NAHC	Native American Heritage Commission
NO <sub>2</sub>	nitrogen dioxide
O <sub>3</sub>	ozone
OHWM	ordinary high water mark
PM <sub>10</sub>	particulate matter with a diameter less than or equal to 10 microns (coarse particulate matter)
PM <sub>2.5</sub>	particulate matter with a diameter less than or equal to 2.5 microns (fine particulate matter)
RWQCB	Regional Water Quality Control Board
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
SO <sub>2</sub>	sulfur dioxide
SR-	state route

DE SOTO TANKS PROJECT  
INITIAL STUDY

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Acronym/ Abbreviation	Definition
SSC	state species of special concern
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
WL	Watch List



# 1 INTRODUCTION

## 1.1 Project Overview

The De Soto Tanks Project (proposed project) is a water storage project that is being proposed by the Los Angeles Department of Water and Power (LADWP). The project would functionally replace the existing 3-million-gallon (MG) De Soto Reservoir, located at 11200 De Soto Avenue, with two buried, pre-stressed circular concrete storage tanks immediately north of the existing reservoir site. The combined operating storage capacity upon completion of the new storage tanks would be approximately 20 MG. These tanks would provide additional local storage to increase operational effectiveness, reliability, and flexibility; system redundancy; and emergency supply to the West San Fernando Valley.

## 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 and will therefore act as the CEQA lead agency.

An Initial Study (IS) has been prepared by LADWP as the lead agency in accordance with CEQA guidelines to determine if the proposed project could have the potential to cause significant adverse environmental impacts. Based on the conclusions of the Initial Study evaluation (contained in Section 3), LADWP has determined that the proposed project may have a significant impact and, therefore, will prepare an Environmental Impact Report (EIR) pursuant to CEQA. Since some impacts evaluated in the Initial Study would not be potentially significant, LADWP proposes to eliminate them from detailed evaluation in the EIR.

## 1.3 Project Location

The proposed project site is located at 11200 De Soto Avenue, in the Chatsworth community of City of Los Angeles. The project site is generally bounded by the 118 Freeway to the north, De Soto Avenue to the west, Rinaldi Street to the south and east. Adjacent to the De Soto Reservoir property on the east side, is an undeveloped, privately-owned parcel of land that would be acquired in order to facilitate construction of the proposed project. The project is located in Council District No. 12 and in the Chatsworth Neighborhood Council area. See Figure 1, Regional Map and Figure 2, Vicinity Map.

## 1.4 Environmental Setting

The proposed project would occur on several assessor's parcels owned by LADWP. The southernmost parcel (APN 2706007901) is developed with the existing De Soto Reservoir, which would be removed after completion of the

proposed tanks. The two northernmost parcels (APNs 2701003907 and 2707001904) are essentially undeveloped. An additional undeveloped parcel (APN 2707001019), not owned by LADWP, is proposed for acquisition to facilitate project construction. The project site is highly disturbed, consisting primarily of ruderal vegetation that is maintained through mowing and/or tilling. A 12-foot wide dedicated equestrian trail easement extends from Rinaldi Street on the south adjacent to the eastern edge of the southernmost LADWP parcel, where the reservoir is located. This formal easement does not continue across the northernmost LADWP parcels, but LADWP has allowed equestrian access across these parcels between Rinaldi Street on the east and the dedicated equestrian easement on the west. Throughout construction and operation of the proposed project, equestrian access would be maintained.

Existing development that adjoins the LADWP property includes Sierra Canyon School to south/southeast of the project site and residential properties to the southwest. Undeveloped property adjoins the LADWP property to the south, west, and northeast. The 118 Freeway is located directly north of the project site. Surrounding uses include Sierra Canyon School to the west of De Soto Avenue, residential development south and southeast of Rinaldi Street, and open space and residential development north of the 118 Freeway. See Figure 2.

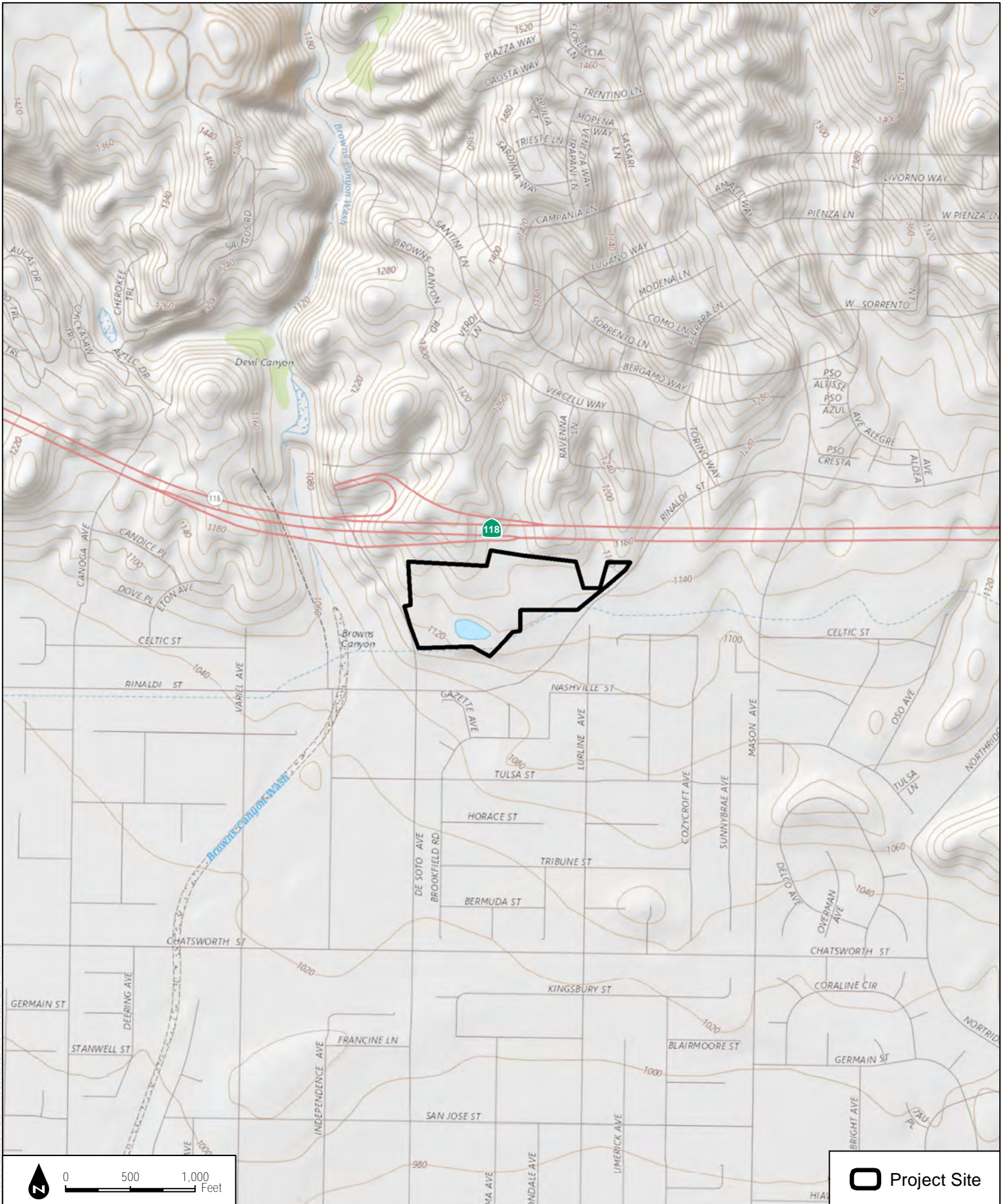
## 1.5 References

- City of Los Angeles. 2017. *Chatsworth-Porter Ranch Circulation*. Department of City Planning, Information Technologies Division. February 2, 2017. Accessed June 13, 2017. <https://planning.lacity.org/>.
- County of Los Angeles. 2016. "Figure 7.3 Highway Plan Policy Map" in *Los Angeles County General Plan*. Adopted October 6, 2016. Accessed June 13, 2017. <http://planning.lacounty.gov/generalplan/generalplan>.



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SOURCE: USGS 7.5-Minute Series Oat Mountain Quadrangle

**DUDEK**

LADWP De Soto Tanks Project

**FIGURE 2**  
Vicinity Map

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## 2 PROJECT DESCRIPTION

### 2.1 Background

The De Soto Tanks Project (proposed project) is a water storage project that is being proposed by the Los Angeles Department of Water and Power (LADWP). The project would functionally replace the existing 3-MG De Soto Reservoir, located at 11200 De Soto Avenue, with two buried, pre-stressed circular concrete storage tanks immediately north of the existing reservoir site. The combined operating storage capacity upon completion of the new storage tanks would be approximately 20 MG. These tanks would provide additional local storage to increase operational effectiveness, reliability, and flexibility; system redundancy; and emergency supply to the West San Fernando Valley (see Figure 3, Site Plan).

The existing De Soto Reservoir, located in the northwestern area of the San Fernando Valley, was built in 1941. It has a base elevation of 1,100 feet above mean sea level and a high water level of 1,123 feet. In order to maintain appropriate operating pressure, the two proposed buried pre-stressed concrete tanks would have a base elevation of 1,100 feet, a high water level of 1,130 feet, and a top of tank elevation of 1,140 feet. Excavation at the proposed project site would be required to bury the tanks, which would be approximately 240 feet in diameter and 40 feet in height, below existing grade level in order to achieve these target elevations.

Construction of the De Soto Tanks Project would also require the installation of new inlet pipelines that would connect to the LADWP Rinaldi Trunk Line and outlet pipelines that would connect to the LADWP De Soto Trunk Line and Granada Trunk Line. These new lines would be a total of approximately 2,500 linear feet and would be located entirely within the proposed project site on LADWP property. A new regulator station would also be required to reduce water pressure from the Rinaldi Trunk Line originating at the Los Angeles Aqueduct Filtration Plant, which is located in Sylmar and has an 1190-foot high water elevation.

Upon completion of the De Soto Tanks, a new pump station (the De Soto Pump Station) would be constructed in the location of the De Soto Reservoir, which would be removed. The pump station would be used to more efficiently and effectively supply water to various pressure zones in the distribution system of the west San Fernando Valley.

### 2.2 Construction

The proposed project involves excavation of the site north of the existing De Soto Reservoir to a depth of approximately 50 feet, followed by the construction of two pre-stressed concrete tanks, each of which would be approximately 240 feet in diameter and approximately 40 feet in height. Excavated material would be hauled from the project site via the 118 Freeway to a facility permitted to accept excavated soil materials. Upon completion of the tanks, the existing reservoir would be demolished in order to facilitate construction of the future pump station.

Excavation for the tanks would involve the use of heavy equipment, including excavators, front loaders, and dozers. Based on preliminary estimates, approximately 350,000 loose cubic yards of soil would need to be excavated at the project site to

accommodate the tanks. Some of this material would be used to backfill around the tanks once they are constructed. However, the majority of the excavated material would be hauled off site, requiring several thousand truck trips. Excavation and hauling would occur over a period of about 8 months. After excavation, the tank construction would entail the installation of inlet/outlet pipes, a reinforced concrete floor, the erection of scaffolding for the walls and roof, the installation of wall and roof panels, the construction of columns to support the roof, wrapping the tanks with pre-stressing cables, and the application of concrete on the walls and roof. This process would involve the delivery of materials and concrete and the use of heavy equipment, including cranes and concrete pump trucks.

After completion of the tanks, the area surrounding the tanks would be backfilled, and a perimeter road would be constructed around the tanks for maintenance access. All cut slopes from excavation would be properly stabilized and revegetated. Although the tanks themselves would be buried, the roof of the tanks would not be covered. However, the top of the tanks would be approximately 10 feet below the surrounding grade.

New pipelines, the inlets, and outlets pipelines of the tanks would be constructed on site. After completion of the tanks and pipelines, the existing De Soto Reservoir would be demolished and the new pump station would be constructed.

Access to and egress from the site during construction would be from Rinaldi Street on the east and/or De Soto Avenue on the west. Construction of the proposed project would take approximately 6 years to complete, beginning in late-2020.

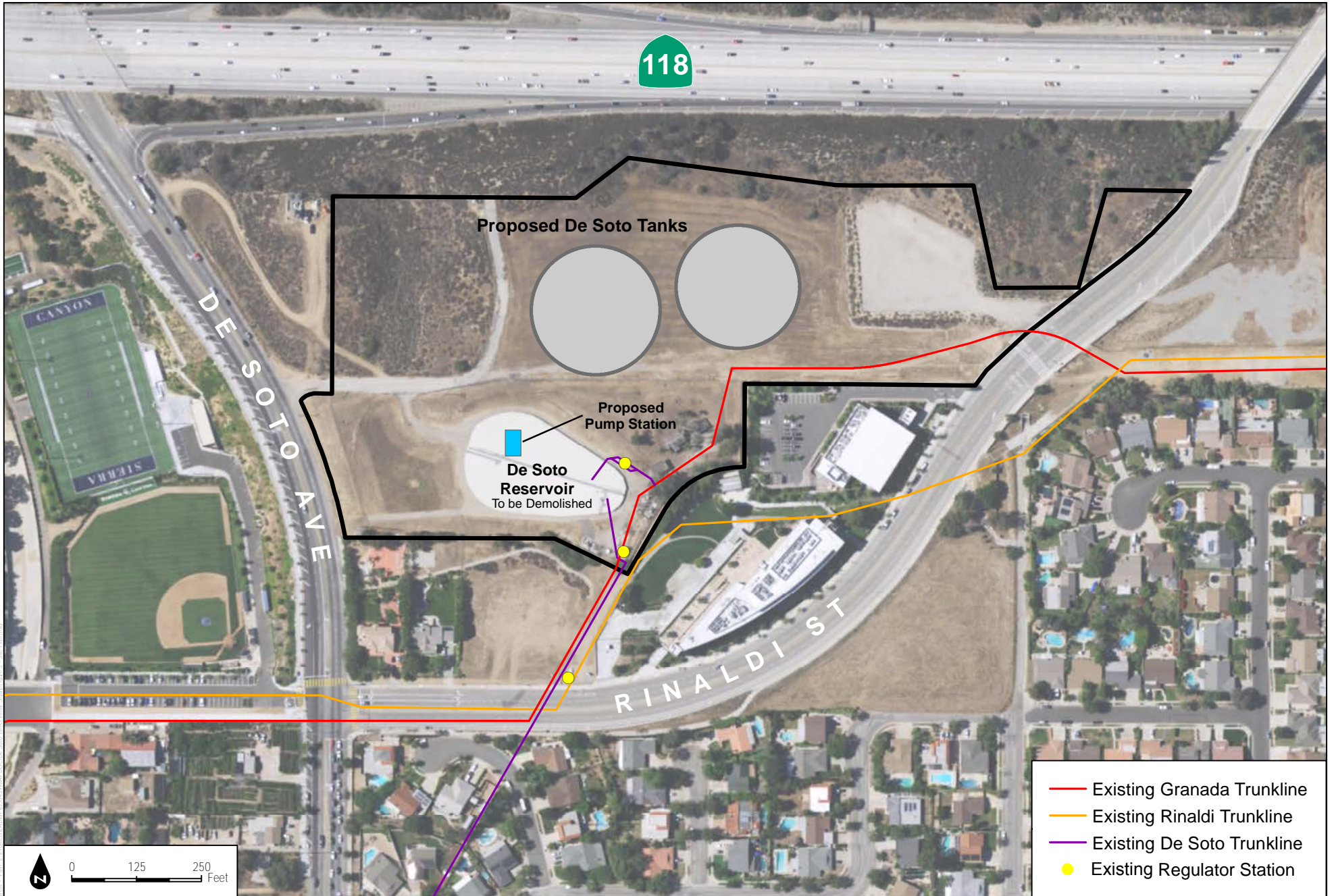
## 2.3 Operations

As discussed above, the proposed tanks would store potable water to increase operational effectiveness, reliability, and flexibility; system redundancy; and emergency supply to the West San Fernando Valley. The proposed pressure regulator station would reduce the water pressure coming from Los Angeles Aqueduct Filtration Plant, which has an 1190-foot high water elevation, to the De Soto Tanks, which have a 1130-foot high water elevation. The proposed De Soto Pump Station would pump water from the De Soto Tanks to the 1305-ft pressure zone in the southwest valley. No workers would be required to operate these facilities on a daily basis; however, these facilities would require regular maintenance. As such, operational activities would be essentially the same as those that occur under existing conditions.

## 2.4 Discretionary Approvals Required for the Project

The following discretionary permits and approvals may be required for the proposed project:

- Permit from Los Angeles Department of Public Works Bureau of Engineering (BOE) for excavation in a public right of way
- Permit from Los Angeles Department of Building and Safety for haul route
- Permit from California Department of Transportation (Cal Trans), if temporary shoring tie-backs encroach onto Cal Trans property
- Permit from Los Angeles Department of Transportation for traffic control plans and lane closures



118

Proposed De Soto Tanks

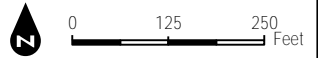
Proposed Pump Station

De Soto Reservoir  
To be Demolished

DE SOTO AVE

RINALDI ST

- Existing Granada Trunkline
- Existing Rinaldi Trunkline
- Existing De Soto Trunkline
- Existing Regulator Station



**DUDEK**

SOURCE: LADWP

LADWP De Soto Tanks Project

**FIGURE 3**  
Site Plan

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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 (2017) to determine if the proposed project may have a significant effect on the environment.

**1. Project title:**

De Soto Tanks Project

**2. Lead agency name and address:**

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

**3. Contact person and phone number:**

Brian Gonzalez  
Environmental Planning and Assessment  
Los Angeles Department of Water and Power  
213.367.2612

**4. Project location:**

11200 De Soto Avenue  
Los Angeles, California 91311

**5. Project sponsor's name and address:**

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

**6. City Council District:**

District 12

**7. Neighborhood Council District**

Chatsworth Neighborhood Council



**8. General plan designation:**

- 11050 De Soto Avenue (APN 2701003907): Very Low II Residential, Existing “K” Equine-keeping District under the Chatsworth-Porter Ranch Community Plan
- 11200 De Soto Avenue (APN 2706007901): Very Low II Residential
- 11101 North Lurline Avenue (APN 2707001904): Very Low II Residential, Existing “K” Equine-keeping District under the Chatsworth-Porter Ranch Community Plan
- APN 2806001903: Very Low II Residential
- APN 2706001\*\*\*: Very Low II Residential
- APN 2707001019: Very Low II Residential, designated Very Low I Housing in the Porter Ranch Land Use and Transportation Specific Plan
- De Soto Avenue is identified as a Boulevard II in the City of Los Angeles’ Chatsworth-Porter Ranch Circulation Map and a Major Existing Highway in the County of Los Angeles General Plan

**9. Zoning:**

- 11050 De Soto Avenue (APN 2701003907): A1-1 (Agriculture Zone), ZI No.2438: Equine-keeping in the City of Los Angeles, ZI No. 2427: Freeway Adjacent Advisory Notice for Sensitive Uses
- 11200 De Soto Avenue (APN 2706007901): A2-1 (Agricultural Zone), ZI No.2438: Equine-keeping in the City of Los Angeles, ZI No. 2427: Freeway Adjacent Advisory Notice for Sensitive Uses
- 11101 North Lurline Avenue (APN 2707001904): A1-1 (Agriculture Zone), ZI No.2438: Equine-keeping in the City of Los Angeles, ZI No. 2427: Freeway Adjacent Advisory Notice for Sensitive Uses
- APN 2806001903 and APN 2706001\*\*\*: RA-1 (Suburban Zone), ZI No.2438: Equine-keeping in the City of Los Angeles, ZI No. 2427: Freeway Adjacent Advisory Notice for Sensitive Uses, ZI No. 2462: Modifications to Single-Family Zones and Single-Family Zone Hillside Area Regulations
- APN 2707001019: RE20-1 (Residential Estate Zone), ZI No.2438: Equine-keeping in the City of Los Angeles, ZI No. 2427: Freeway Adjacent Advisory Notice for Sensitive Uses, ZI No. 2462: Modifications to Single-Family Zones and Single-Family Zone Hillside Area Regulations

**10. Description of project:**

The De Soto Tanks Project (proposed project) is a water storage project that is being proposed by the Los Angeles Department of Water and Power (LADWP). The project would replace the existing 3-MG De Soto Reservoir, located at 11200 De Soto Avenue, with two buried, pre-stressed concrete circular storage tanks immediately north of the existing reservoir site. The combined operating storage capacity upon completion of the new storage tanks would be approximately 20 MG. These tanks would provide additional local storage to



increase operational effectiveness and flexibility, system redundancy, and emergency supply to the West San Fernando Valley.

**11. Surrounding land uses and setting:**

Existing development that adjoins the LADWP property includes Sierra Canyon School to south/southeast of the project site and residential properties to the southwest. Undeveloped property adjoins the DWP property to the south, west, and northeast. The 118 Freeway is located directly north of the project site. Surrounding uses include Sierra Canyon School to the west of De Soto Avenue, residential development south and southeast of Rinaldi Street, and open space and residential development north of the 118 Freeway.

**12. Other public agencies whose approval is required:**

**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, has consultation begun?**

LADWP requested a listing of tribes to notify from the Native American Heritage Commission (NAHC). The NAHC provided the list on July 28, 2017, and LADWP subsequently sent letters on August 25, 2017 to each of the eight tribes identified by NAHC. To date, no tribes have contacted LADWP requesting consultation.

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 21083.3.2.) 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.

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

## DETERMINATION

On the basis of this initial evaluation:

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

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Signature

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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.

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

### 3.1 Aesthetics

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

**Less Than Significant Impact.** Scenic vistas generally refer to views of expansive open space areas or other natural features, such as mountains, undeveloped hillsides, large natural water bodies, or coastlines. Less commonly, certain urban settings or features, such as a striking or renowned skyline, may also represent a scenic vista. Under CEQA, scenic vistas also generally, although not exclusively, refer to views that are accessible to broader segments of the public, rather than those available to a limited number of private entities. The proposed project site is not located within such a scenic vista and is generally not visible from areas off site. Furthermore, the proposed tanks would be located below grade. As such, the tanks would not generally be visible from outside of the project site nor would they obscure any existing scenic vistas. The proposed inlet/outlet trunk line would also be located below grade and thus would not be visible. As such, impacts to scenic vistas would be less than significant. This issue will not be further analyzed in the EIR.

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

**Less Than Significant Impact.** The proposed project is located within 250 feet of the 118 Freeway, a City designated scenic freeway (City of Los Angeles 2014) and an eligible state scenic highway (Caltrans 2011). In addition, the portion of Rinaldi Street approximately 500 feet to the west and 650 feet to the south of the project site is designated as a Scenic Major Highway II and a Scenic Secondary Highway by the City of Los Angeles (City of Los Angeles 2014). However, due to intervening terrain and vegetation directly south of the 118 Freeway and the fact that project facilities would be subterranean, the proposed project would not be visible from the 118 Freeway. Views of the proposed site are largely obscured from Rinaldi Street due to intervening elements, such as structures and trees. Furthermore, the tanks and the proposed inlet/outlet trunk line would be underground and would not be visible from Rinaldi Street. For this reason, impacts to scenic highways would be less than significant. This issue will not be further analyzed in the EIR.

- c) *Would the project substantially degrade the existing visual character or quality of the site and its surroundings?*

**Less Than Significant Impact.** With the exception of the existing reservoir, proposed to be removed, the site is largely undeveloped with a few transmission towers present. As described above, the project would be located below grade and would not be visible outside of the project site. Therefore, the proposed project would not significantly alter the existing visual character and quality of the site and its surroundings, and impacts would be less than significant. This issue will not be further analyzed in the EIR.

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

**No Impact.** It is expected that construction of the proposed project would only occur during daytime hours, between 7:00 am and 6:00 pm, Monday through Friday, and, if necessary, between 8:00 am and 5:00 pm on Saturday. As such, no sources of light at the site would be introduced during construction of the proposed project. During operation of the proposed project, no new substantial sources of light and glare would be present. As such, impacts would be less than significant, and this issue will not be further analyzed in the EIR.

## References

- California Department of Transportation (Caltrans). 2011. California Scenic Highway Mapping System. September 7 2011. [http://www.dot.ca.gov/hq/LandArch/16\\_livability/scenic\\_highways/](http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/). Accessed May 18 2017.
- City of Los Angeles. 2014. Chatsworth – Porter Ranch Community Plan. General Plan Land Use Map. August 20 2014.

### 3.2 Agriculture and Forestry Resources

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

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

**No Impact.** The project site does not contain land that is designated as Farmland on maps prepared pursuant to the Farmland Mapping and Monitoring Program (California Department of Conservation 2014). As such, the proposed project would not convert Farmland to a non-agricultural use, and no impact would occur. This issue will not be further analyzed in the EIR.

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

**Less Than Significant Impact.** The northernmost and easternmost portions of the project site are Zoned A1-1 (Agricultural Zone) and designated Very Low II Residential in the City of Los Angeles General Plan (City of Los Angeles 2017). The southern portion of the project site, where the existing reservoir is located is Zoned A2-1 (Agricultural Zone) and designated Very Low II Residential in the City of Los Angeles General

Plan (City of Los Angeles 2017). The property adjacent to the project site to the east is an undeveloped, privately-owned parcel which LADWP proposes to acquire. The property is adjacent to the proposed tanks site to the east is zoned RE20-1 (Residential Estate Zone) and designated Very Low II Residential in the City of Los Angeles General Plan (City of Los Angeles 2017).

The proposed project site has been owned by LADWP for approximately 80 years as part of the De Soto Reservoir property. The project site has never been utilized for agriculture or any use other than water storage and conveyance. Thus, the proposed water tanks would be consistent with the historical use of water storage on the LADWP property. Since no agricultural use has ever occurred on the property, the property is not subject to a Williamson Act contract. Impacts would be less than significant. This issue will not be further analyzed in the EIR.

- 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.** Although the site contains some tree cover, it is not considered forest land, timberland, or a timberland production zone as defined in the California Public Resources Code or Government Code. As such, no impact would occur, and this issue will not be further analyzed in the EIR.

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

**Less Than Significant Impact.** As described under Section 3.2(c), the project site does not contain forest land. It would not result in the loss of forest land or conversion of forest land to non-forest use. Impacts would be less than significant and this issue will not be further analyzed in the EIR.

- 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?***

**Less Than Significant Impact.** There is no farmland or forest land within the project site or on adjacent parcels. The project would increase overall water supply, but rather increase the reliability of water supply. Thus, it would not contribute to growth that may lead to the conversion of farmland or forest land. There would be no potential for construction or operation of the proposed project to convert farmland to non-agricultural use or forest land to non-forest use, either directly or indirectly. Impacts would be less than significant. This issue will not be further analyzed in the EIR.

## References

California Department of Conservation. 2014. *California Important Farmland Finder*. Accessed May 18 2017.  
<http://maps.conservation.ca.gov/ciff/>



California Department of Conservation. 2015. *State of California Williamson Act Contract Land*. [map]. Accessed May 18, 2017. <http://www.conservation.ca.gov/dlrp/lca/Pages/Index.aspx>

City of Los Angeles. 2017. Zimas. "Planning and Zoning." Web Map Application. Accessed May 18, 2017. <http://zimas.lacity.org/>

### 3.3 Air Quality

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

**Potentially Significant Impact.** The proposed project is located in the South Coast Air Basin (SCAB), which is under the jurisdiction of the SCAQMD. The most recent applicable air quality plan is the SCAQMD 2016 Air Quality Management Plan (AQMP), which includes reduction and control measures that are outlined to mitigate emissions based on existing and projected land use and development. The SCAQMD has established criteria for determining consistency with the 2016 AQMP in Chapter 12, Sections 12.2 and 12.3 of the SCAQMD *CEQA Air Quality Handbook* (SCAQMD 1993). These criteria are:

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

Due to the extensive excavation required for the proposed project, as well as the haul truck trips required to remove the excavated soil, there is the potential for the project to result in significant air quality impacts. As such, the EIR will evaluate the project's consistency with the SCAQMD 2016 AQMP based on the SCAQMD guidance.

**b) *Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?***

**Potentially Significant Impact.** The proposed project would be required to comply with all relevant federal, state, and local air quality regulations, including acquisition of a permit to construct, permit to operate, and permit for demolition from SCAQMD. Nonetheless, the proposed project would generate short-term criteria air pollutant emissions associated with large scale excavation of soil, pollutant emissions associated with entrained dust (earth movement), and internal combustion engines used by on-site construction equipment and from off-site worker vehicles and truck trips. Minimal impacts to air quality would occur during operation of the proposed project. However, impacts from construction, while temporary, would be potentially significant and will be further analyzed in the EIR.

**c) *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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?***

**Potentially Significant Impact.** The SCAB is designated as a nonattainment area for both federal and state ozone (O<sub>3</sub>) standards and fine particulate matter (PM<sub>2.5</sub>) standards. The SCAB is designated as a nonattainment area for state PM<sub>10</sub> standards; however, it is designated as an attainment area for federal PM<sub>10</sub> standards. The SCAB is designated as an attainment area under the state and federal standards for nitrogen dioxide (NO<sub>2</sub>), carbon monoxide (CO), and sulfur dioxide (SO<sub>2</sub>) standards. While the SCAB has been designated as nonattainment for the federal rolling 3-month average lead standard, it is designated attainment for the state lead standard (EPA 2017; CARB 2016). Air quality emissions anticipated to result from construction of the proposed project could be potentially significant and as such will be quantified as part of the EIR. This analysis will indicate whether the proposed project would result in a cumulatively considerable net increase in criteria air pollutants for which the SCAB has been designated non-attainment.

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

**Potentially Significant Impact.** According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes. Exhaust from construction equipment and vehicles would release air pollutants to the atmosphere. The project site is located adjacent to Sierra Canyon School and within 600 feet of residential uses. Therefore, construction of the proposed project may have potential to expose sensitive receptors to

increased pollutant concentrations. No equipment or activities are proposed during project operations; thus, minimal to no impacts to air quality would occur during operation of the proposed project. However, due to potentially significant air quality impacts to sensitive receptors during construction, this issue will be further analyzed in the EIR.

e) ***Would the project create objectionable odors affecting a substantial number of people?***

**Less Than Significant Impact.** Odor is a form of air pollution that is possibly most obvious to the general public. Odors can present significant problems for the source and its surrounding community. The occurrence and severity of potential odor impacts depends on numerous factors. The nature, frequency, and intensity of the source; the wind speeds 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 and cause concern.

Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, and dairies (SCAQMD 1993). The project entails construction of two buried water storage tanks, a pump station, a pressure regulating station, and a buried inlet/outlet trunk line and would not result in the creation of a land use that is associated with odors. Potential sources that may emit odors during construction of the proposed project would include diesel equipment, gasoline fumes, and asphalt paving materials from the installation of the proposed trunk line. Additionally, the proposed project involves significant soil excavation which may create odors. However, odors from these sources would disperse rapidly from the project site and generally occur at magnitudes that would not affect substantial numbers of people. In addition, the proposed project would use typical construction techniques to reduce odors in compliance with SCAQMD rules. As such, the construction of the proposed project would not cause an odor nuisance, and odor impacts would be less than significant. This issue will not be further analyzed in the EIR.

## References

- CARB (California Air Resources Board). 2016. *State Area Designations*. Area Designations Maps / State and National. Last reviewed May 5, 2016. <http://www.arb.ca.gov/desig/adm/adm.htm>.
- EPA (U.S. Environmental Protection Agency). 2017. "Region 9: Air Quality Analysis, Air Quality Maps." Last updated March 7, 2017. <https://www3.epa.gov/region9/air/maps/#cal>.
- SCAQMD (South Coast Air Quality Management District). 1993. *CEQA Air Quality Handbook*.

### 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

**Potentially Significant Impact.** A biological reconnaissance site visit was performed on June 20, 2017, which included a survey of the project site plus a 500-foot area from the perimeter of the project site (study area). No special-status plants species were identified on site during the site visit, which occurred during the blooming period for most special-status plants with potential to occur within the study area based on a review of California Department of Fish and Wildlife (CDFW) California Natural Diversity Data Base (CNDDB) (CDFW 2017) and California Native Plant Society (CNPS 2017) 9-quadrangle search. The majority of the project site is compacted and overgrown with mustards (*Brassica nigra* and *Hirschfeldia incana*), providing limited potential to support special-status plant species. A smaller portion of coastal sage scrub habitat dominated by California buckwheat (*Eriogonum fasciculatum* var. *foliolosum*) occurs within the northwestern portion of the site. Although it is unlikely for special-status plants to occur within the compacted areas dominated by mustards, there is moderate or high potential for four special-status plant species to occur within the coastal scrub habitat on-site. Special-status plant species with potential to occur include Santa Susana tarplant (*Deinandra mintbornii*; California rare (CR), CNPS California Rare Plant Rank (CRPR) 1B.2); Robinson's pepper-grass (*Lepidium virginicum* var. *robinsonii*; CNPS CRPR 4.3); white rabbit-tobacco (*Pseudognaphalium leucocephalum*; CNPS CRPR 2B.2); and chaparral ragwort (*Senecio aphanactis*; CNPS CRPR 2B.2).

Although no special-status wildlife species were observed during the site visit, two special-status bird species have a moderate potential to occur within the study area based on a 9-quadrangle review of CNDDB (CDFW 2017): coastal California gnatcatcher (*Poliophtila californica*; federally threatened [FT]; state species of special concern [SSC]); and Cooper's hawk (*Accipiter cooperii*; CDFW Watch List species [WL]). The coastal sage scrub habitat within the northeastern portion of the project site, as well as the adjacent areas north of the project site provide suitable habitat to support coastal California gnatcatcher. The closest documented occurrence for the species is 6.5 miles east and 7.3 miles northwest of the project site; however, federally-designated critical habitat for this species exists within a mile northwest of the project site. Thus, based on suitable coastal scrub habitat and its range, coastal California gnatcatcher could occur on site. Additionally, Cooper's hawk have adapted to nesting in tall ornamental trees (e.g., *Eucalyptus* spp. and *Pinus* spp.) within developed areas, including commercial and industrial areas (Chiang et al. 2012). This species was not observed on site during the site visit; however, the ornamental trees within the study area provide suitable nesting habitat for this species, in addition to other nesting raptors. Thus, Cooper's hawk has a moderate potential to nest within the study area. Searches for suitable burrowing owl burrows, surrogates, and/or fossorial mammals were performed to determine potential for burrowing owl. No burrowing owls, signs, or suitable burrows were observed during the site visit. Additionally, the site is compacted and the majority of the project site is overgrown with mustards too dense to support burrowing owl. Thus, potential for burrowing owl occurrence is low.

Cooper's hawk is a CDFW watch list species, with no state and/or federal listing. Minimal impacts to potential foraging habitat are anticipated following project construction. However, direct permanent and temporary impacts may occur to special-status birds with moderate to high potential to nest within and adjacent to the project site. Construction activities conducted during the general nesting bird breeding season (February 1 through August 31) could disrupt breeding activity. Additionally, given that coastal sage scrub habitat suitable to support the federally listed coastal California gnatcatcher habitat would be impacted, focused coastal California gnatcatcher surveys are recommended for the project site. As such, impacts are potentially significant, and this issue will be further analyzed in the EIR.

- 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?*

**Potentially Significant Impact.** The only sensitive vegetation community present at the project site is California buckwheat scrub; no riparian habitats occur on-site. Although California buckwheat scrub is not recognized as a sensitive vegetation community by California Department of Fish and Wildlife (CDFW; CDFG 2010a,b,c), this vegetation community has the potential to support the federally listed coastal California gnatcatcher. As such, if this species is determined to be present during focused surveys, occupied coastal California gnatcatcher habitat would be considered sensitive. Hence, impacts or substantial adverse effects on riparian or other sensitive natural communities are potentially significant. This issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** There are several concrete drainage swales within and adjacent to the project site. A jurisdictional delineation of the project site would be required to determine whether or not these drainages are jurisdictional and, therefore, regulated by the U.S. Army Corps of Engineers (ACOE) acting under Section 404 of the Clean Water Act (CWA); the Regional Water Quality Control Board (RWQCB) acting under Section 401 of the CWA and the Porter-Cologne Act; and/or the CDFW acting under Sections 1600–1607 of the California Fish and Game Code. Additionally, a metal corrugated pipe is located along the southeastern extent of the project site, just west of Rinaldi Street. Run-off from the graded road and southeastern extent of the property appears to collect at the metal corrugated pipe, as is evident by two or three swales identified in the adjacent area during the site visit. These swales lacked an ordinary high water mark (OHWM) and/or bed or bank and appear to facilitate runoff from the graded road and areas north of the southeastern portion of the project site to the underground storm drain. Although the swales are unlikely to be jurisdictional, the storm drain is likely to connect with an existing underground channel southeast of its location, which runs parallel to Rinaldi Street; and thus, is potentially state and/or federally jurisdictional. As

such, impacts would be potentially significant. Although wetlands do not occur within the study area, there are a number of potentially jurisdictional state and/or federally jurisdictional waters that will be further analyzed in the EIR.

- 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?*

**Potentially Significant Impact.** The project site is located in proximity with urban environments to the north, west, south, and east, and is located immediately south of the 118 Freeway. The project site does not reside within any designated wildlife corridors or habitat linkages identified in the South Coast Missing Linkages analysis conducted by South Coast Wildlands (South Coast Wildlands 2008) or by the City of Los Angeles (1993). The South Coast Missing Linkages Report (2008) identifies the Santa Monica-Sierra Madre Connection as one of the few coastal to inland connections remaining in the South Coast Ecoregion. However, the Santa Monica-Sierra Madre Connection is located approximately 4.5 miles west of the project site and is separated from the project site by development. The Chatsworth-Porter Ranch Community Plan recognizes a wildlife corridor through the Simi Hills and Santa Susana Mountains to the Santa Monica Mountains and acknowledges the 118 Freeway as a major potential barrier to these corridors. Thus, culverts are required to be constructed under 118 Freeway in areas west of Topanga Canyon Boulevard (City of Los Angeles 1993). The project is located approximately 1.0 mile east of Topanga Boulevard, outside of any City designated wildlife corridors; thus, it would not result in impacts to this designated wildlife corridor.

Although the project site is not recognized as a wildlife corridor as per South Coast Wildlands (2008) or City of Los Angeles (1993), it has the potential to be occasionally used by wildlife in the area, particularly to access Monteria Lake approximately 0.76 mile east of the project site via a small strip of undeveloped lands, occurring south of the 118 Freeway. Additionally, Browns Canyon Wash is located approximately 0.25 mile west of the project site immediately north of the Sierra Canyon School Lower Campus field. Browns Canyon Wash supports riparian vegetation, flows beneath the 118 Freeway, and eventually provides connection with Santa Susana Mountains, as well as the Santa Monica-Sierra Madre Connection at its northern extent; thus, is likely to facilitate wildlife passage beneath the 118 Freeway to better quality open space areas north of the project site and the 118 Freeway. De Soto Avenue divides the project site from Browns Canyon Wash on its western extent, and serves as an underpass beneath the 118 Freeway. Thus, wildlife could access better quality open space areas from the project site by crossing De Soto Avenue to access and utilize Browns Canyon Wash. Therefore, although the project site is not part of a recognized linkage it has the potential to be utilized as a wildlife corridor to these undeveloped areas. Additionally, these areas could provide habitat for some more common species (i.e., common birds and desert cottontail). Hence, impacts or substantial adverse effects on movement of any native resident or migratory fish or wildlife species are potentially significant, and this issue will be further analyzed in the EIR.

Operation of the proposed project would still allow the area to be utilized by wildlife at the same capacity in which it is currently used. Construction of the underground storage tanks would not prohibit any potential current use as a wildlife corridor and habitat linkage; thus, operational impacts would be less than significant.

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

**Potentially Significant Impact.** One valley oak tree (*Quercus lobata*) is present east of the reservoir, and a number of western sycamore trees (*Platanus racemosa*) are present north and south of the project site. Valley oak and western sycamore trees are recognized as protected trees by the City of Los Angeles. The valley oak tree is located 40 feet east of the reservoir and has the potential to be impacted by the proposed project activities. Three western sycamore trees were identified north of the eastern extent of the project site. Two of these western sycamore trees are within 100 feet north of the project site. Although these trees are outside of the project site, these trees could be indirectly impacted by the proposed project activities and thus, should be analyzed further in the EIR. The western sycamore trees to the south of the project site appear to be planted and are unlikely to be protected under local policies or ordinances. Additionally, these trees are separated from the project site by a wall; and thus, are unlikely to be affected by the proposed project activities.

Further evaluation is needed to confirm the presence of both species and whether or not they are protected under local policies or ordinances. As such, impacts are considered potentially significant. This issue will be further analyzed in the EIR.

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

**No Impact.** The project site is not located within an adopted Habitat Conservation Plan or Natural Community Conservation Plan (CDFW 2017). Additionally, the project does not conflict with the provisions of the Chatsworth-Porter Ranch Community Plan (City of Los Angeles 1193). As discussed above, the Chatsworth-Porter Ranch Community Plan recognizes a wildlife corridor through the Simi Hills and Santa Susana Mountains to the Santa Monica Mountains, which requires that culverts be constructed under SR-118 in areas west of Topanga Canyon Boulevard (City of Los Angeles 1993). The project is located approximately 1.0 mile east of Topanga Boulevard, outside of any recognized wildlife corridor; thus, no impact to this corridor would occur. Therefore, the proposed project would not 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 would occur and this issue will not be further evaluated in the EIR.



## References

CDFG (California Department of Fish and Game). 2010a. “Natural Communities List Arranged Alphabetically by Life Form”. September 2010. Accessed January 13, 2014. [http://www.dfg.ca.gov/biogeodata/vegcamp/natural\\_comm\\_list.asp](http://www.dfg.ca.gov/biogeodata/vegcamp/natural_comm_list.asp).

CDFG. 2010b. “Hierarchical List of Natural Communities with Holland Types”. September 2010. Accessed January 13, 2014. [http://www.dfg.ca.gov/biogeodata/vegcamp/natural\\_comm\\_list.asp](http://www.dfg.ca.gov/biogeodata/vegcamp/natural_comm_list.asp).

CDFG. 2010c. “List of Vegetation Alliances and Associations.” Vegetation Classification and Mapping Program. September 2010. Accessed January 2014. <https://nrmsecure.dfg.ca.gov/FileHandler.ashx?DocumentID=24718>.

CDFW (California Department of Fish and Wildlife). 2015. *California Regional Conservation Plans* [map]. August 2015. Accessed June 21, 2017. <https://www.wildlife.ca.gov/Conservation/Planning/NCCP>.

Chiang, S. N., P. H. Bloom, A. M. Bartuszevige, and S. E. Thomas. 2012. Home Range and Habitat Use of Cooper’s Hawks in Urban and Natural Areas. Online ([www.ucpress.edu/go/sab](http://www.ucpress.edu/go/sab)) in C. A. Lepczyk and P. S. Warren (editors). Urban bird ecology and conservation. Studies in Avian Biology (no. 45), University of California Press, Berkeley, California.

City of Los Angeles. 1993. *Chatsworth—Porter Ranch Community Plan*. Accessed June 21, 2017. <http://planning.lacity.org/>

South Coast Wildlands. 2008. *South Coast Missing Linkages: A Wildland Network for the South Coast Region*. Accessed online on February 28, 2014 at: <http://www.scwildlands.org/reports/Default.aspx#3>.

## 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 as defined in §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) *Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?*

**Potentially Significant Impact.** The proposed project site is largely undeveloped. One structure, the De Soto Reservoir, was constructed in the early 1940's. Demolition of this structure has the potential to result in an adverse change to an historical resource. LADWP has conducted a cultural record search for the proposed project site and surrounding one-mile radius. The records search found that 30 previously recorded cultural resources were located within one mile of the project area, but none of these resources overlap with the project area. However, because the De Soto Reservoir was constructed more than 50 years ago, impacts to historical resources could be potentially significant and this issue will be further discussed in the EIR.

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

**Potentially Significant Impact.** The proposed project would involve significant soil excavation during construction of the underground storage tanks. These ground-disturbing activities have the potential to damage or destroy intact subsurface archaeological resources or deposits that may be present. In the event that this happens, impacts could be significant. Although the cultural records search found no previously recorded cultural resources within the project area, the potential for discovery of resources during construction and soil disturbance is possible, and damage to or destruction of resources may result in significant adverse impacts on archaeological resources. The EIR will therefore discuss the potential for archaeological resources to be impacted by the proposed project and, if necessary, identify mitigation measures to reduce impacts of the proposed project on any archaeological resources that may be present.

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

**Potentially Significant Impact.** The proposed project would involve significant soil excavation during construction of the underground storage tanks. These ground-disturbing activities have the potential to

damage or destroy paleontological resources that may be present below the ground surface. In the event that this happens, impacts could be significant. Although the cultural records search found no previously recorded cultural resources within the project area, the potential for discovery of resources during construction and soil disturbance is possible, and damage to or destruction of resources may result in significant adverse impacts on paleontological resources. The EIR will therefore discuss the potential for paleontological resources to be impacted by the proposed project and, if necessary, identify mitigation measures to reduce impacts of the proposed project on any paleontological resources that may be present.

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

**Potentially Significant Impact.** The proposed project would involve significant soil excavation during construction of the underground storage tanks. These ground-disturbing activities have the potential to disturb human remains that may be present below the ground surface. In the event that this happens, impacts could be significant. The EIR will therefore discuss the potential for human remains to be impacted by the proposed project and, if necessary, identify mitigation measures to reduce impacts of the proposed project on human remains that may be present.

### 3.6 Geology and Soils

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) *Would the project expose people or structures to 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.*

**Less Than Significant Impact.** The proposed project site is not located within an Earthquake Fault Zone, formerly known as an Alquist-Priolo Earthquake Fault Zone, and is not traversed by any known active faults. The nearest active fault to the project site, as identified by the City of Los Angeles, is the Santa Susana fault, located approximately 2.9 miles from the project site. Fault rupture is not expected to occur on the project site (City of Los Angeles 2017). Impacts would therefore be less than significant, and this issue will not be further analyzed in the EIR.

ii) *Strong seismic ground shaking?*

**Less Than Significant Impact.** As with all areas in Southern California, the project site is located in a seismically active region, within which are numerous known earthquake faults. As stated in Section 3.6(a)(i), there is a known earthquake fault approximately 2.9 miles from the project site. As with most areas throughout Southern California, the site could be exposed to strong seismic ground shaking. However, the proposed tanks would be designed and constructed in accordance with the latest version of the California Building Code and the City of Los Angeles Building Code, and all other applicable federal, state, and local codes relative to seismic criteria. Additionally, the

proposed project would not exposure people or structures to potential adverse effects from strong ground shaking. As such, impacts would be less than significant, and this issue will not be further analyzed in the EIR.

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

**Less Than Significant Impact.** The project site has not been identified as being potentially susceptible to liquefaction (City of Los Angeles 2017). According to preliminary geotechnical investigations, the project site is not situated within the Liquefaction Hazard Zone. Liquefaction is generally considered possible when the depth to groundwater is less than about 50 feet below the ground surface. At the project site, the depth of groundwater is more than 50 feet below the ground surface. Thus, the potential for liquefaction is considered to be low. Impacts would be less than significant. This issue will not be further analyzed in the EIR.

*iv) Landslides?*

**Less Than Significant Impact.** The project site has not been mapped as a landslide hazards area (City of Los Angeles 2017). According to preliminary geotechnical investigations, the potential for landslides induced by seismic shaking is not anticipated to pose a significant hazard to the project site. Further, most of the project site is in a relatively flat-lying area where landslides would not be expected to occur. Based on an aerial photograph analysis and geologic reconnaissance, there is no geomorphic evidence of pre-existing landslides at the project site. Thus, there is a low potential for landslides to adversely affect the project.

The proposed project would involve extensive excavation during construction of the underground storage tanks. This excavation would occur in accordance with standard design practices, stability analyses will be performed, and grading measures, such as maximum slope gradients and benching, would be implemented to ensure stability of the slopes. Thus, it is not anticipated that slope failure and landslides will pose a significant hazard, and impacts would be less than significant. This issue will not be further analyzed in the EIR.

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

**Less Than Significant Impact.** Construction of the proposed project would involve extensive excavation that would result in ground surface disturbance that could create the potential for erosion. As discussed in Section 3.6(a)(iv), above, construction would occur in accordance with standard design practices, stability analyses will be performed, and grading measures, such as maximum slope gradients and benching, would be implemented to ensure stability of the slopes. As such, impacts would be less than significant and this issue will not be further analyzed in the EIR.

- 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 discussed in Section 3.6(a)(iii), the project site is not subject to seismically-related ground failure, including liquefaction or lateral spreading. The project would not involve the extraction of groundwater such that subsidence would occur. Further, as described in Section 3.6(a)(iv), construction would occur in accordance with standard design practices, stability analyses will be performed, and grading measures such as maximum slope gradients and benching, would be implemented to ensure stability of the slopes. Thus, it is not anticipated that slope failure and landslides will pose a significant hazard. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

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

**Less Than Significant Impact.** Expansive soils are fine-grained soils that can undergo a significant increase in volume with an increase in water content and a significant decrease in volume with a decrease in water content. According to preliminary geotechnical investigations, the soils in the project area consist primarily of sand and gravel. Therefore, expansive soils are not considered to pose a significant hazard to the proposed project. As such, impacts would be less than significant, and this issue will not be further analyzed in the EIR.

- 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?*

**Less Than Significant Impact.** The proposed project would not require the use of septic tanks or other alternative wastewater disposal systems. During project construction, sanitary waste would be handled by temporary portable chemical toilets. The waste from temporary facilities would be removed by a private contractor and disposed of at an approved off-site location. During operation, the project would not require the use of septic tanks or other alternative disposal systems. As such, impacts would be less than significant. This issue will not be further analyzed in the EIR.

## References

City of Los Angeles. 2017. Zimas. "Seismic Hazards." Web Map Application. Accessed May 30, 2017.  
<http://zimas.lacity.org/>

### 3.7 Greenhouse Gas Emissions

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

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

**Potentially Significant Impact.** Greenhouse gas (GHG) emissions would be produced from project-related short-term construction activities. Construction activities would result in GHG emissions from heavy construction equipment, haul trips of excavated soil, truck traffic, and worker trips to and from the project site. As global climate change is a cumulative impact, the proposed project would have a potential impact through its incremental contribution of GHG emissions combined with the cumulative increase of all other sources of GHGs. As such, impacts associated with GHGs would be potentially significant. The EIR will analyze GHG emissions and determine whether the proposed project would result in a significant cumulative increase in GHGs.

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

**Potentially Significant Impact.** The City of Los Angeles released the GreenLA Climate Action Plan (CAP) in May 2007. The City’s CAP includes goals, objectives, and actions to reduce GHG emissions within the City and create a more sustainable environment (City of Los Angeles 2007). In April 2015, the City of Los Angeles’s Sustainable City Plan was released. Among other goals, the plan sets GHG emissions reduction targets of 45% by 2025, 60% by 2035, and 80% by 2050, all against a 1990 baseline, and GHG efficiency targets for Los Angeles’s economy of improvement by 55% in 2025 and 75% in 2035 from 2009 baseline levels<sup>1</sup> (City of Los Angeles 2015). The second annual Sustainable City Plan report (2016–2017) determined that the City of Los Angeles’s emissions are 20% below the 1990 baseline as of 2013, putting the City of Los Angeles nearly halfway to the 2025 plan reduction target of 45% below (City of Los Angeles 2017).

<sup>1</sup> GHG efficiency is the amount of GHG emissions emitted per dollar of economic productivity, which is assumed to be 44.5 MT CO<sub>2</sub>E per million dollars of metro area gross domestic product in 2009 (City of Los Angeles 2015).

Further investigation is required to determine whether the proposed project would be consistent with applicable plans, policies, or regulations. Impacts are potentially significant, and this issue will be further analyzed in the EIR.

## References

City of Los Angeles. 2007. Green LA: An Action Plan to Lead the Nation in Fighting Global Warming. Released May, 2007. Accessed May 18, 2017. [http://www.environmentla.org/pdf/GreenLA\\_CAP\\_2007.pdf](http://www.environmentla.org/pdf/GreenLA_CAP_2007.pdf)

City of Los Angeles. 2015a. About the pLAN. Accessed July 7, 2017. <http://plan.lamayor.org/about-the-plan/>

City of Los Angeles. 2015b. Sustainable City pLAN. Released April 8, 2015. Accessed July 7, 2017. <http://plan.lamayor.org/about-the-plan/>

City of Los Angeles. 2017. Sustainable City pLAN Second Annual Report (2016-2017). Accessed July 7, 2017. <http://plan.lamayor.org/our-progress/second-annual-report/>

## 3.8 Hazards and Hazardous Materials

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted,	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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.** Small amounts of commonly used hazardous substances, such as gasoline, diesel fuel, lubricating oil, grease, and solvents would be used during construction of the proposed project. However, construction activities would be short-term in nature, and the type of materials that would be involved are not considered acutely hazardous. Furthermore, the routine handling, transport, and storage of these materials are subject to federal, state, and local health and safety requirements. In accordance with the City’s Construction and Demolition Ordinance, all haulers and contractors responsible for handling construction and demolition waste must obtain a Private Waste Hauler Permit prior to collecting, hauling and transporting the waste from within the City, and construction and demolition waste can only be taken to City Certified processing facilities.

The operation of the proposed project would not involve hazardous materials. There is currently a chlorination station on site next to the existing reservoir. However, this station is currently not operational and would be demolished under the proposed project. Although injection ports for spot treatments would be required for the tanks, chemicals would not be stored on site. As such, the proposed project would not create a significant hazard the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant and will not be further analyzed in the EIR.

- 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 3.8(a) above, although small amounts of commonly used hazardous substances would be used during construction, the type of materials would be limited and not be considered acutely hazardous. Additionally, currently there are no known conditions at the project site that would result in the reasonably foreseeable upset or accident conditions. As such, the proposed project would not increase hazards to the public involving upset or accidents. Impacts would be less than significant and this issue will not be further analyzed in the EIR.

- 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 Impact.** The proposed project is located adjacent to Sierra Canyon School Upper Campus and approximately 500 feet from Sierra Canyon School Lower Campus. However, as stated in discussions under 3.8(a) and 3.8(b), above, the project would involve limited amounts of commonly used hazardous substances during construction. The type of materials, including fuel, lubricating oil, grease, and solvents, would be limited, would not be considered acutely hazardous, and would be subject to federal, state, and local health and safety requirements. Impacts would be less than significant. This issue will not be further examined in the EIR.

- 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?*

**No Impact.** The project site is not included on any hazardous waste site lists including the California Department of Toxic Substances Control's EnviroStor database, the State Water Resources Control Board's GeoTracker site, the Cortese list, the Superfund Site list, or other lists compiled pursuant to Section 65962.5 of the Government Code (CalEPA2017; California Department of Toxic Substances Control 2017; California State Water Resources Control Board 2017; U.S. EPA 2016, 2017). Therefore, the project would not create a significant hazard to the public or the environment and no impact would occur. No further analysis of this issue is required in the EIR.

- 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 for people residing or working in the project area?*

**No Impact.** The proposed project site is not located within a two-mile radius of any public airport or public use airport. The closest airport to the project site is Van Nuys Airport, located approximately 7 miles

southeast of the project site. Additionally, no airport land use plans apply to the site. Therefore, the proposed project would not create an aircraft safety hazard for people residing or working in the project area, no impacts would occur, and no further analysis of this issue is required in the EIR.

- f) *For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?*

**No Impact.** The nearest private airstrip is Boeing De Soto Heliport – CN32, a private heliport, located 2.4 miles south of the project site, and Hughes-Canoga Park Heliport, located approximately 3 miles southwest of the project site. Due to the distance of these airstrips from the project site, no safety hazards would occur. This issue will not be further analyzed in the EIR.

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

**Less Than Significant Impact.** The City of Los Angeles adopted a multi-hazard emergency response plan in order to respond with maximum feasible speed and efficiency to disaster events. Construction of the proposed project would occur on LADWP property and thus would not conflict with an adopted emergency response plan or emergency evacuation plan. As such, impacts would be less than significant. This issue will not be further analyzed in the EIR.

- h) *Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?*

**Less Than Significant Impact.** The project site is largely undeveloped and located adjacent to mostly residential areas, with open space located to the north and northwest. According to the City of Los Angeles General Plan, the site is located within a Fire Buffer Zone (City of Los Angeles 1996). The project site is also designated Very High Severity Fire Zone by the City (City of Los Angeles 2017). Construction of the proposed project would involve brush clearance. According to the City's brush clearance requirements, owners of properties located in the Very High Fire Hazard Severity Zone shall maintain their property in accordance with the Fire Code, as outlined in the City of Los Angeles Municipal Code Section 57.322. LADWP would ensure compliance with the City's brush clearance requirements. Compliance with all codes and requirements to minimize the potential for impacts from wild fires would ensure that impacts are less than significant. This issue will not be further analyzed in the EIR.

## References

CalEPA (California Environmental Protection Agency). 2017. Cortese List Data Resources. Accessed May 19, 2017. <http://www.calepa.ca.gov/sitecleanup/corteselist/>.

California Department of Toxic Substances Control. 2017. *EnviroStor Database*, Search by Map Location. Accessed May 19, 2017. <http://www.envirostor.dtsc.ca.gov/public/>.

California State Water Resources Control Board. 2017. GeoTracker Database, Search by Map Location. Accessed May 19, 2017. <http://geotracker.waterboards.ca.gov/>.

City of Los Angeles. 1996. “Safety Element” in *The Los Angeles City General Plan*. Department of City Planning. Adopted November 26, 1996. Accessed May 19, 2017. <http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf>.

City of Los Angeles. 2017. Zimas. “Additional.” Web Map Application. Accessed May 19, 2017. <http://zimas.lacity.org/>

County of Los Angeles. 2004. Van Nuys Airport – Airport Influence Area. Los Angeles County Airport Land Use Commission. December 1, 2014. Accessed May 19, 2017. <http://planning.lacounty.gov/view/alup/>.

County of Los Angeles. 2009. Airport Land Use Commission (ALUC) Viewer. Accessed May 22, 2017. <http://planning.lacounty.gov/gis/interactive>

LASAN (Los Angeles Sanitation). 2017. “Waste Hauler Permit Program.” Accessed June 19, 2017. [https://www.lacitysan.org/san/faces/wcnav\\_externalId/s-lsh-wwd-s-c-whp?\\_adf.ctrl-state=qzwd06sz1\\_4&\\_afLoop=7446509154384210#!](https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-s-c-whp?_adf.ctrl-state=qzwd06sz1_4&_afLoop=7446509154384210#!)

U.S. EPA (United States Environmental Protection Agency). 2017. Superfund Site Search Results (National Priorities List). Last updated May 15, 2017. Accessed May 15, 2017. <https://www.epa.gov/superfund/search-superfund-sites-where-you-live>.

U.S. EPA (United States Environmental Protection Agency). 2017. Pacific Southwest Region 9, Site List, Search by County. Accessed May 19, 2017. <http://yosemite.epa.gov/r9/sfund/r9sfdocw.nsf/WSOState!OpenView>

### 3.9 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) *Would the project violate any water quality standards or waste discharge requirements?*

**Less than Significant Impact.** Construction of the proposed project could create the potential for erosion during excavation. However, construction activities would be subject to applicable requirements of the

SWRCB and RWQCB with respect to control of surface erosion, sedimentation, and runoff quality. LADWP would comply with these requirements, including preparation of a construction Stormwater Pollution Prevention Plan (SWPPP). Because implementation of the proposed project would collectively require construction activities resulting in land disturbance of more than 1 acre, through tank installation, pipe construction, and removal of the existing reservoir, LADWP would be required to obtain coverage under the Construction General Permit (SWRCB Order 2009-0009-DWQ, as amended), which pertains to pollution from grading and Project construction. Coverage under the Construction General Permit requires a qualified individual (as defined by the SWRCB) to prepare a SWPPP to address the potential for construction-related activities to contribute to pollutants within the proposed project's receiving waterways. The SWPPP must describe the type, location and function of structural measures to alleviate stormwater impacts and must demonstrate that the combination of measures selected are adequate to meet the discharge prohibitions, effluent standards, and receiving water limitations contained in the Construction General Permit. This would ensure that construction impacts would be less than significant. During operations, the proposed project would not contribute additional pollutant sources to the groundwater basin. As such, through compliance with construction regulations, impacts to water quality would be less than significant. This issue will not be further evaluated in the EIR.

- b) *Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (i.e., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?*

**Less Than Significant Impact.** Although the proposed project would not use local groundwater supplies, construction of the proposed storage tanks would require significant soil excavation. According to preliminary geotechnical investigations, no groundwater was encountered in the borings drilled during the investigation, and groundwater is not expected to constrain site preparation or construction of the tanks. As such, construction activities would not interfere with local groundwater recharge. Impacts are less than significant. This issue will not be further analyzed in the EIR.

- 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, in a manner which would result in substantial erosion or siltation on- or off-site?*

**Potentially Significant Impact.** One creek, Brown's Creek, is located 500 feet to the west of the project site. However, no impacts or alterations of the waterway would occur as a result of the proposed project. The construction of the proposed project would involve ground disturbance from excavation that could create the potential for erosion to occur. Further, the two storage tanks and additional structures would add impervious surfaces on the site, creating a potential to alter the existing drainage pattern. Although the construction

contractor would be required to implement methods to minimize erosion and sedimentation during construction and post construction operations, in accordance with the Construction General Permit described in Section 3.9(a), impacts to the existing drainage pattern on site would be potentially significant. Further analysis is required to ensure that potential alterations of the existing drainage courses and the increase in impervious surfaces on site would not result in substantial erosion or siltation on- or off- site. This issue will be further analyzed in the EIR.

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

**Potentially Significant Impact.** As described in Section 3.9(c), one creek, Brown's Creek, is located 500 feet to the west of the project site. The proposed project would not result in the alteration of the course of Brown Creek. However, the proposed project would involve significant excavation to install two buried concrete water storage tanks. As such, during construction, the project would temporarily alter the drainage pattern of the site due to excavation, grading, and exposure of topsoil and has the potential to alter the existing drainage pattern on site. Further analysis is required to ensure potential alterations of existing drainage and the increase of impervious surfaces on site would not substantially increase the rate or amount of surface runoff resulting in flooding on- or off-site. In addition, Low Impact Development post best management practices may be applicable if developing 500 square feet or more pervious to impervious surface. As such, impacts are potentially significant. This issue will be further analyzed in the EIR.

- e) *Would the project 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?*

**Potentially Significant Impact.** The proposed project would involve an increase in impervious surfaces on site, attributable to the addition of two buried tanks. An increase in impervious surfaces has the potential to increase runoff and/or pollutants in the site runoff. The proposed project also involves the removal of the existing De Soto Reservoir, directly to the south of the storage tanks. There are two stormwater drains located to the southwest of the project site at the intersection of De Soto Avenue and Rinaldi Street, four stormwater catch basins to the southeast of the project site, and six catch basins further to the east along Rinaldi Street. These nearby catch basins would direct excess drainage from the proposed project to the municipal storm drain system (LADPW 2017). However, because the increase in impervious surfaces on the site, impacts would be potentially significant. This issue will be further analyzed in the EIR.

- f) *Would the project otherwise substantially degrade water quality?*

**Less Than Significant Impact.** Based on the type and magnitude of activities anticipated during project construction and operations, and the fact that industrial waste discharges will be managed through a discharge

permit process with the RWQCB, and runoff will be managed during both construction and operations, the proposed project would not otherwise substantially degrade water quality. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

*g) Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?*

**No Impact.** The project site is not located within a 100-year flood hazard area as indicated on the Federal Emergency Management Agency (FEMA) Flood Insurance zone maps for Los Angeles County. The proposed project would not provide any new housing, nor would it increase the risk related to flood hazard for existing housing in the vicinity currently located outside the 100-year flood hazard area. Since no impact would occur, this issue will not be further analyzed in the EIR.

*h) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?*

**No Impact.** According to the most recent FEMA Flood Insurance Rate Map for the area and the City of Los Angeles General Plan Safety Element, the project site is not located within an area subject to a 100-year flood hazard. Therefore, no impact would occur, and this issue will not be further analyzed in the EIR.

*i) Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?*

**No Impact.** The proposed project involves the construction of two buried concrete water storage tanks, pipeline installation, and removal of the existing De Soto Reservoir. As such, the project would not increase the risk of loss, injury, or death involving flooding on the site or in the vicinity. No impact would occur, and this issue will not be further analyzed in the EIR.

*j) Inundation by seiche, tsunami, or mudflow?*

**No Impact.** The tsunami inundation hazard maps, published by the California Department of Conservation, show that the project site is not within a tsunami inundation zone (State of California Department of Conservation 2016). While the proposed project would involve the construction of two buried concrete water storage tanks, these tanks would be enclosed and below grade and would therefore not pose a seiche hazard. As such, no impacts would occur, and this issue will not be further analyzed in the EIR.



## References

- State of California Department of Conservation. Los Angeles County *Tsunami Inundation with USGS 24K Quads, 2016*. Accessed May 22, 2017. [http://www.conservation.ca.gov/cgs/geologic\\_hazards/Tsunami/Inundation\\_Maps/LosAngeles](http://www.conservation.ca.gov/cgs/geologic_hazards/Tsunami/Inundation_Maps/LosAngeles)
- FEMA Map Service Center. 2008. *Flood Insurance Rate Map (FIRM) 06037C1075F*. September 26, 2008. Accessed May 22 2017. <https://msc.fema.gov/portal/search?AddressQuery=11050%20De%20Soto%20Avenue#searchresultsanchor>
- LADPW (Los Angeles Department of Public Works). 2017. Los Angeles County Storm Drain System. Web map application. Accessed May 22, 2017. <http://dpw.lacounty.gov/fcd/stormdrain/index.cfm>.

### 3.10 Land Use and Planning

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

**No Impact.** The proposed project would be located in the interior of a site that is owned by LADWP. The proposed project would involve construction of two storage tanks on property owned by LADWP followed by the removal of the existing De Soto Reservoir. Thus, project implementation would not result in physical division of any established communities. No impact would occur, and this issue will not be further analyzed in the EIR.

- b) *Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?*

**Less Than Significant Impact.** The proposed project would be located on a site owned by LADWP. The project site is designated Very Low II Residential in the City of Los Angeles General Plan (City of Los Angeles 2017). The northernmost property that comprises the project site as well as the property adjacent to the southeast are Zoned A1-1 (Agricultural Zone). The property to the south of the proposed tanks, where the existing reservoir is located, is Zoned A2-1 (Agricultural Zone). The properties adjacent to the existing reservoir to the west are zoned RA-1 (Suburban Zone). This property would be used for access during construction and no project component would be constructed on this property.

The entire project site is designated Very Low II Residential by the City of Los Angeles General Plan. However, the project site is largely undeveloped and has been owned by LADWP for approximately 80 years as part of the De Soto Reservoir property. The site has never been utilized for agriculture, residential use, or any use other than water storage and conveyance. Thus, the proposed tanks would be consistent with the historical use of water storage on the LADWP property. Because the use of the project site would remain unchanged, the proposed project would not conflict with a land use or zoning designation. Impacts would be less than significant. This issue will not be further analyzed in the EIR.

- c) *Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?*

**No Impact.** The proposed project would not conflict with any habitat conservation plan. The site is not within a habitat conservation plan or a natural community conservation area (CDFW 2015; City of Los Angeles 2015). No impact would occur, and this issue will not be further analyzed in the EIR.

## References

- CDFW (California Department of Fish and Wildlife). 2015. *California Regional Conservation Plans* [map]. August 2015. Accessed May 22, 2017. <https://www.wildlife.ca.gov/Conservation/Planning/NCCP>.
- City of Los Angeles. 2014. *General Plan Land Use Map – Chatsworth – Porter Ranch Community Plan* [map]. August 2015. Accessed May 22, 2015.
- City of Los Angeles. 2017. Zimas. "Planning and Zoning." Web Map Application. Accessed May 22, 2017. <http://zimas.lacity.org/>

City of Los Angeles. 1993. *Chatsworth—Porter Ranch Community Plan*. Accessed May 22, 2017.  
<http://planning.lacity.org/>

City of Los Angeles Municipal Code Section 12.05 “A1” Agricultural Zone.

City of Los Angeles Municipal Code Section 12.06 “A2” Agricultural Zone.

City of Los Angeles Municipal Code Section 12.07.01 “RE” Residential Estate Zone.

City of Los Angeles Municipal Code Section 12.22. Exceptions

### 3.11 Mineral Resources

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

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

**No Impact.** The proposed project is not designated as a known mineral resources site of significance to the State or region (California Department of Conservation 2015). No impact would occur. This issue will not be further analyzed in the EIR.

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.** The proposed project site is not identified as a locally important mineral resource site delineated on a local general plan, specific plan, or other land use plan (City of Los Angeles 1996). No impact would occur, and this issue will not be further analyzed in the EIR.

## References

California Department of Conservation (Division of Mines and Geology). 1979. *Mineral Land Classification of the Greater Los Angeles Area: Classification of Sand and Gravel Resource Areas, San Fernando Valley Production-Consumption Region. Aggregate*. Accessed May 22, 2017. <http://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc>

City of Los Angeles. 1996. General Plan – Safety Element. Adopted November 26, 1996. Accessed May 22, 2014. <http://cityplanning.lacity.org/>

### 3.12 Noise

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) *Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

**Potentially Significant Impact.** The proposed project site is bordered by a school to the west, southeast, and south of the site. Residential uses are also generally surround the project site. As such, construction activities could potentially expose nearby sensitive receptors to noise levels above established standards. Although construction activity would be temporary, some activities may be audible at receptors. Because construction activities have the potential to result in noise levels above established standards, impacts could be potentially significant. This issue will be further analyzed in the EIR.

The operation of the proposed project would not create any substantial noise generating activities. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

- b) *Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?*

**Potentially Significant Impact.** Certain activities during project construction may expose persons to excessive groundborne noise levels. Although this impact would be temporary, related to only the construction phase of the proposed project, it may still be considered significant. Further evaluation of potentially significant impacts related to groundborne noise generated by construction activities for the proposed project will be conducted in the EIR.

The operation of the proposed project would not create any groundborne vibration. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

- c) *Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?*

**Less Than Significant Impact.** The proposed project involves the construction of two underground storage tanks, water line installation, and removal of the existing De Soto Reservoir. The operation of these facilities would not create a permanent increase in ambient noise levels. As such, impacts would be less than significant, and this issue will not be further analyzed in the EIR.

- d) *Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?*

**Potentially Significant Impact.** A substantial temporary increase in ambient noise levels in the project vicinity above levels existing without the project may occur related to project construction activities. As such, temporary impacts during construction would be considered potentially significant. Further evaluation of this issue will be conducted in the EIR.

e) *Would the project be 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 expose people residing or working in the project area to excessive noise levels?*

**No Impact.** As discussed in Threshold 3.8(e), the proposed project is not located within an airport land use plan (County of Los Angeles 2009) or within a two-mile radius of any public airport or public use airport. No impact would occur, and this issue will not be further analyzed in the EIR.

f) *Would the project be within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?*

**No Impact.** As discussed in Threshold 3.8(f), the nearest private airstrip is Boeing De Soto Heliport – CN32, a private heliport, located 2.4 miles south of the project site, and Hughes-Canoga Park Heliport, located approximately 3 miles southwest of the project site. Due to the distance of these airstrips from the project site, no noise impacts would occur, and this issue will not be further analyzed in the EIR.

**References**

County of Los Angeles. 2009. Airport Land Use Commission (ALUC) Viewer. Accessed May 22, 2017.  
<http://planning.lacounty.gov/gis/interactive>

**3.13 Population and Housing**

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

- a) *Would the project induce substantial 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 does not include construction of new homes or businesses or the extension of roads or other infrastructure that would induce population growth. The project does not propose to increase overall water supply, but rather provide additional local storage to increase operational effectiveness, reliability, and flexibility; system redundancy; and emergency supply to the West San Fernando Valley. Additionally, the number of personnel required for project construction in the context of the Los Angeles urban area would be low and temporary in nature, and no substantial population growth in the area would occur related to construction. The operation of the proposed project would not increase the number of operating personnel on site and thus would not induce population growth or the need for new housing in the area. No impact would occur relative to population growth. This issue will not be further analyzed in the EIR.

- b) *Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?*

**No Impact.** There is no existing housing within the project site, and the proposed project would not involve removal of any housing. No impact would occur. This issue will not be further analyzed in the EIR.

- c) *Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?*

**No Impact.** The proposed project would not displace any people, as none live on site. No impact would occur. This issue will not be further analyzed in the EIR.

### 3.14 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

***Fire Protection***

**No Impact.** Fire protection for the proposed project site is provided by the City of Los Angeles Fire Department (City of Los Angeles 2017). The proposed project would not generate a requirement for additional fire protection services. No Impact would occur, and this issue will not be further analyzed in the EIR.

***Police Protection***

**No Impact.** Police protection for the proposed project site is provided by the Los Angeles Police Department. The proposed project would not generate a requirement for additional police protection. No impact would occur, and this issue will not be further analyzed in the EIR.

***Schools***

**No Impact.** The proposed project would not generate a demand for school services, nor would it lead directly or indirectly to substantial population growth within a given geographical area such that new or physically altered school facilities would be required. No impact would occur, and this issue will not be further analyzed in the EIR.

***Parks***

**No Impact.** The proposed project would generate a demand for parks, nor would it lead directly or indirectly to substantial population growth within a given geographical area such that new or physically altered park facilities would be required. As such, no impact would occur, and this issue will not be further analyzed in the EIR.

***Other Public Facilities***

**No Impact.** No new housing or business would be constructed as part of the project, nor would the proposed project directly or indirectly induce population growth in the area such that new or physically altered governmental facilities would be required to adequately provide services. No impact would occur, and this issue will not be further analyzed in the EIR.



## References

City of Los Angeles. 2017. Zimas. "Public Safety." Web Map Application. Accessed May 23, 2017.  
<http://zimas.lacity.org/>

### 3.15 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

**Less Than Significant Impact.** Neither the construction nor operation of the proposed project would generate any additional population that would increase the use of existing neighborhood or regional parks or other recreational facilities. However, an equestrian trail does pass through a portion of the project site. A 12-foot wide equestrian trail was constructed as part of the Sierra Canyon Secondary School Project in order to provide connectivity between major horse-keeping neighborhoods. This trail, which is located within a dedicated easement, extends eastward along Rinaldi Street from De Soto Avenue and then northward adjacent to the school, where it connects to the LADWP property. The formal easement does not continue across the LADWP property, but LADWP has allowed equestrian access across the property between the dedicated equestrian easement on the west and Rinaldi Street on the east. During both construction and operation of the proposed project, equestrian access through the LADWP property would be maintained by constructing a wall separating the project site from the trail. As such, impacts to existing neighborhood and regional parks and other recreational facilities would be less than significant. This issue will not be further analyzed in the EIR.

- 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?*

**Less than Significant Impact.** The proposed project involves the construction of two buried concrete water storage tanks, pipeline installation, and demolition of an existing reservoir on land owned by LADWP, as well as an undeveloped parcel that LADWP would acquire. The proposed project does not include construction or expansion of recreational facilities or require construction or expansion of recreational facilities that might have an adverse physical effect on the environment. The proposed project would not generate a demand for parks, nor would it lead directly or indirectly to substantial population growth such that the construction or expansion of recreation facilities would be required. As such, impacts to recreational facilities or the construction or expansion of recreational facilities would be less than significant. This issue will not be further analyzed in the EIR.

### References

City of Los Angeles. 2002. Chatsworth—Porter Ranch Community Plan Equestrian Areas and Trails [map]. Prepared June 2002. Accessed May 23 2017.

### 3.16 Transportation and Traffic

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) *Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?*

**Potentially Significant Impact.** The proposed project involves the construction of two buried concrete water storage tanks and pipeline installation, as well as the demolition of the existing De Soto Reservoir. Construction would require trucks to haul excavated soils and demolition material away from the project site and to deliver materials and supplies during tank construction. Although construction conditions would be temporary, related only to the period of time needed for construction of the proposed facilities, it may cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system. Further evaluation of potentially significant impacts related to traffic generated by construction activities for the proposed project will be conducted in the EIR.

Operation of the proposed project would not cause any increase in traffic in relation to the existing traffic load and capacity of the street system nor would it adversely affect any other mode of transportation because no workers or vehicles beyond current operations at the site would be required. As such, operational impacts would be less than significant and will not be further analyzed in the EIR.

- b) *Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?*

**Potentially Significant Impact.** Construction of the proposed project would require extensive grading and excavation thereby generating a significant number of haul truck trips. Although impacts would be temporary,

and related only to the construction phase of the proposed project, construction traffic may exceed a level of service standards established by the county congestion management agency for designated roads or highways. Further evaluation of potentially significant impacts related to traffic generated by construction activities for the proposed project will be conducted in the EIR.

Operation of the proposed project would not increase the amount of daily inbound and outbound traffic at the site as no workers or vehicles beyond current operations at the site would be required. As such, operational impacts would be less than significant and will not be further analyzed in the EIR.

- c) *Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?*

**No Impact.** The proposed project involves the construction of two buried concrete water storage tanks and pipeline installation, as well as the demolition of the existing De Soto Reservoir. As such, the construction and operation of the project would not generate air traffic, and the project would not include any structures of a height that could act as a hazard to aircraft navigation. No impact would occur. This issue will not be further analyzed in the EIR.

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

**Potentially Significant Impact.** No changes to existing transportation facilities would occur as a result of the proposed project. Construction of the proposed project would involve deliveries of materials, components, and supplies to the site, and may involve oversize trucks. Since oversize loads are needed, permits specifying route and time limits, as well as necessary traffic control measures, would be required from state, county, and/or City agencies. As such, impacts to increase of hazards due to incompatible uses are potentially significant. This issue will be further analyzed in the EIR.

- e) *Would the project result in inadequate emergency access?*

**Less Than Significant Impact.** The City of Los Angeles adopted a multi-hazard emergency response plan in order to respond with maximum feasible speed and efficiency to disaster events. . Construction would occur on LADWP property and not interfere with the City's emergency access. As such, impacts would be less than significant. This issue will not be further analyzed in the EIR. Operation of the proposed project would not require personnel at the site on a daily basis. As such, impacts on existing emergency access during operation of the proposed project would be less than significant. This issue will not be further analyzed in the EIR.

- f) *Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?*

**Less Than Significant Impact.** The proposed project involves the construction of two buried concrete water storage tanks and pipeline installation, as well as the demolition of the existing De Soto Reservoir. Construction would take place on LADWP property. Therefore, the project would not conflict with adopted plans, policies, or programs regarding public transit, bicycle, or pedestrian facilities during construction, and impacts would be less than significant. This issue will not be further analyzed in the EIR.

Operation of the proposed project would not increase the amount of daily inbound and outbound traffic at the site as no workers or vehicles beyond current operations would be required. As such, impacts related to conflicts with adopted plans, policies, or programs regarding public transit, bicycle, or pedestrian facilities during operation of the proposed project would be less than significant. This issue will not be further analyzed in the EIR.

### 3.17 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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code 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.** LADWP performed a cultural records search for the proposed project site and surrounding one-mile radius. The records search found that 30 previously recorded cultural resources were located within one mile of the project area. However, none of these resources overlap with the project area. Outreach to local tribes in the vicinity of the proposed project property and the project Area of Potential Effect has been performed by LADWP. LADWP requested a listing of tribes to notify from the NAHC. The NAHC provided the list on July 28, 2017, and LADWP subsequently sent letters on August 25, 2017 to each of the eight tribes identified by NAHC. To date, no tribes have contacted LADWP requesting consultation. Given that the records search did not reveal any known resources on the project site and that no tribes have provided information regarding the potential presence of tribal cultural resources, impacts to tribal cultural resources would be less than significant. This issue will not be further analyzed in the EIR.

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 Impact.** LADWP requested a listing of tribes to notify from the NAHC. The NAHC provided the list on July 28, 2017, and LADWP subsequently sent letters on August 25, 2017 to each of the eight tribes identified by NAHC. To date, no tribes have contacted LADWP requesting consultation. Given that the records search did not reveal any known resources on the project site and that no tribes have provided information regarding the potential presence of tribal cultural resources, impacts to tribal cultural resources would be less than significant. This issue will not be further analyzed in the EIR.

### 3.18 Utilities and Service Systems

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) ***Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?***

**Less Than Significant Impact.** The proposed project would not involve residential, commercial, or institutional uses that would result in wastewater generation. The proposed project would increase the number of personnel on site during construction activities. Sanitary waste related to the temporary increase in on-site workforce during project construction would be handled through the use of portable chemical toilets, the waste from which would be removed by a private contractor and disposed at an approved off-site location that would comply with the wastewater treatment requirements of the RWQCB Los Angeles Region. As such, impacts would be less than significant. This issue will not be further analyzed in the EIR.

- b) *Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

**Less Than Significant Impact.** The proposed project would not involve or require the construction of new wastewater treatment facilities or require an expansion of the existing facilities. As stated in 3.18(a), sanitary waste related to the temporary increase in on-site workforce during project construction would be handled through the use of portable chemical toilets. The volume of sanitary waste generated by the construction workforce would be minor and not require the expansion of these facilities.

The proposed project would not involve or require the construction of new water treatment facilities or require an expansion of the existing facilities. As discussed above, the proposed project would not increase overall water supply, but rather provide additional operational local storage and increase operational effectiveness, reliability, and flexibility; provide system redundancy; and provide emergency supply to the West San Fernando Valley. As such, impacts are less than significant, and this issue will not be further analyzed in the EIR.

- c) *Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

**Less Than Significant Impact.** As discussed in 3.9(e), the proposed two buried concrete water storage tanks would increase the amount of impervious surfaces at the site. There are two stormwater drains located to the southwest of the project site at the intersection of De Soto Avenue and Rinaldi Street, four stormwater catch basins to the southeast of the project site, and six further to the east along Rinaldi Street. These nearby catch basins would direct excess drainage from the proposed project to the municipal storm drain system (LADPW 2017). In addition, the undeveloped areas surrounding the project site to the north and the northeast are expected to partially absorb runoff.

Although the proposed project would increase the amount of impervious surfaces on site, the project would not alter the storm water drainage system to the extent that new storm water drainage facilities or expansion of existing facilities would be required. As such, impacts would be less than significant, and this issue will not be further analyzed in the EIR.

- d) *Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?*

**Less Than Significant Impact.** The proposed project would not require the use of water on site. The project does not propose to increase overall water supply, but rather increase the reliability of the existing



water supply in the west San Fernando Valley. As such, impacts would be less than significant. This issue will not be further analyzed in the EIR.

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

**Less Than Significant Impact.** As discussed in Threshold 3.18(a), above, the project would result in a negligible amount of wastewater generation due to the increased number of personnel on site during construction. Sanitary waste related to the temporary increase in on-site workforce during project construction would be handled through the use of portable chemical toilets, the waste from which would be removed by a private contractor and disposed at an approved off-site location that would comply with the wastewater treatment requirements of the RWQCB Los Angeles Region. No wastewater generation would occur during operation of the proposed project. As such, the proposed project would not place a significant demand on wastewater treatment plants and providers. Impacts would be less than significant and this issue will not be further analyzed in the EIR.

- f) *Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?*

**Potentially Significant Impact.** Waste generated at the project site would consist of excavated soil during construction, construction equipment packaging, construction scrap, and debris from the demolition of De Soto Reservoir. No waste generation is expected to occur at the site as a result of the proposed project during operation. Potential landfills that would accommodate construction waste generated by the proposed project include the Sunshine Canyon, located approximately 6 miles northeast of the project site, and Calabasas Landfill, located approximately 11 miles southwest of the project site. Sunshine Canyon is owned and operated by Republic Services and currently handles approximately one-third of the daily waste of all of Los Angeles County. Sunshine Canyon has a maximum permitted throughput of 12,100 tons of waste per day. This amounts to more than 3.5 million tons annually. Calabasas Landfill currently has a maximum permitted throughput of 3,500 tons of waste per day. This amounts to more than 1.0 million tons annually. General construction waste, including the demolition debris from De Soto Reservoir (which would generate about 100 tons of waste requiring disposal), is anticipated to be small in relation to the capacity of local landfills. However, as discussed above, the proposed project would require excavation of approximately 350,000 cubic yards of soil. Some of this material would be reused as backfill on site, and it is anticipated that much of the exported material would be utilized at other construction sites within the region and would thus not affect the capacity of local landfills. Nonetheless, a portion of the exported material may require disposal in landfills. As such, there is a potential for significant impacts associated with solid waste disposal, and this issue will be further analyzed in the EIR.

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

**Less Than Significant Impact.** As described above, the construction waste generated by the proposed project would be properly disposed of in existing solid waste facilities. Further, construction materials and excavated soils will be disposed of in accordance to federal, state, and local statutes and regulations. LADWP would comply with the City’s Construction and Demolition Ordinance and obtain a Private Hauler Permit prior to collecting, hauling, and transporting waste from within the City and dispose of waste only in City Certified processing facilities. LADWP would also comply with the County-wide Integrated Waste Management Plan. The impact would be less than significant, and this issue will not be further analyzed in the EIR.

**References**

CalRecycle (2017). Facility/Site Summary Details: Calabasas Landfill (19-AA-0056). Accessed July 10, 2017.  
<http://www.calrecycle.ca.gov/SWFacilities/Directory/19-AA-0056/Detail/>

LADPW (Los Angeles Department of Public Works). 2017. Los Angeles County Storm Drain System. Web map application. Accessed May 22, 2017. <http://dpw.lacounty.gov/fcd/stormdrain/index.cfm>.

LASAN (Los Angeles Sanitation). 2017. “Waste Hauler Permit Program.” Accessed June 19, 2017.  
[https://www.lacitysan.org/san/faces/wcnav\\_externalId/s-lsh-wwd-s-c-whp?\\_adf.ctrl-state=qzwd06sz1\\_4&\\_afLoop=7446509154384210#!](https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-s-c-whp?_adf.ctrl-state=qzwd06sz1_4&_afLoop=7446509154384210#!)

**3.19 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 degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

**Potentially Significant Impact.** The project site contains Coastal sage scrub, which may provide habitat for Coastal California Gnatcatcher. Special-status plant species also occur on site. As described in Section 3.4, impacts to special status species would be potentially significant. Further, demolition of the De Soto Reservoir, constructed in the early 1940s, has the potential to result in an adverse change to a historical resource. Ground-disturbing activities have the potential to damage or destroy intact subsurface archaeological or paleontological resources or deposits that may be present below the ground surface. As described in Section 3.5, impacts to Cultural Resources would be potentially significant. As such, this will be evaluated in the EIR prepared for the proposed project.

- 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)?*

**Potentially Significant Impact.** The proposed project may have impacts that have been identified in the Initial Study as individually limited, but may be cumulatively considerable, depending on other current or probable future projects in the vicinity. The EIR will evaluate potential project-related cumulative impacts.

As discussed Section 3.3, the proposed project could contribute to a cumulatively considerable net increase in criteria air pollutants for which the SCAB has been designated non-attainment. The production of GHG related to project construction may result in cumulative impacts that may contribute to global change. Cumulative traffic impacts could also occur during project construction. These impacts are potentially significant and will be further discussed in the EIR.

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

**Potentially Significant Impact.** As discussed above, environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly, may occur from implementation of the proposed project. Further evaluation of potentially significant impacts will be conducted in the EIR relative to construction air quality, construction greenhouse gas emissions, hydrology, construction noise, construction transportation/traffic, and construction solid waste disposal.

## 4 REPORT PREPARERS

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# South Coast Air Quality Management District

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SENT VIA USPS AND E-MAIL:

December 27, 2017

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Brian Gonzalez

Los Angeles Department of Water and Power

Environmental Planning and Assessment

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## **Notice of Preparation of a Draft Environmental Impact Report for the De Soto Tanks Project**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send SCAQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address shown in the letterhead. **In addition, please send with the Draft EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files<sup>1</sup>. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, SCAQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

### **Air Quality Analysis**

SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from SCAQMD's Subscription Services Department by calling (909) 396-3720. More guidance developed since this Handbook is also available on SCAQMD's website at: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). SCAQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: [www.caleemod.com](http://www.caleemod.com).

SCAQMD has also developed both regional and localized significance thresholds. SCAQMD staff requests that the Lead Agency quantify criteria pollutant emissions and compare the results to

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<sup>1</sup> Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

SCAQMD's CEQA regional pollutant emissions significance thresholds to determine air quality impacts. SCAQMD's CEQA regional pollutant emissions significance thresholds can be found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>. In addition to analyzing regional air quality impacts, SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by SCAQMD staff or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis.

In the event that the Proposed Project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Guidance<sup>2</sup> on strategies to reduce air pollution exposure near high-volume roadways can be found at: [https://www.arb.ca.gov/ch/rd\\_technical\\_advisory\\_final.PDF](https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF).

### **Mitigation Measures**

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are

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<sup>2</sup> In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: <https://www.arb.ca.gov/ch/landuse.htm>.



available to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project, including:

- Chapter 11 of SCAQMD's CEQA Air Quality Handbook
- SCAQMD's CEQA web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- SCAQMD's Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86): <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf>
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

### **Alternatives**

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a “no project” alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the Draft EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

### **Permits**

In the event that the Proposed Project requires a permit from SCAQMD, SCAQMD should be identified as a responsible agency for the Proposed Project. For more information on permits, please visit SCAQMD webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to SCAQMD's Engineering and Permitting staff at (909) 396-3385.

### **Data Sources**

SCAQMD rules and relevant air quality reports and data are available by calling SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available at SCAQMD's webpage at: <http://www.aqmd.gov>.

SCAQMD staff is available to work with the Lead Agency to ensure that project air quality impacts are accurately evaluated and any significant impacts are mitigated where feasible. If you have any questions regarding this letter, please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov) or call me at (909) 396-3308.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

LAC171205-06

Control Number



# COUNTY OF LOS ANGELES

## FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE  
LOS ANGELES, CALIFORNIA 90063-3294

DARYL L. OSBY  
FIRE CHIEF  
FORESTER & FIRE WARDEN

December 21, 2017

Brian Gonzalez, Associate Planner  
Los Angeles Department of Water and Power  
Environmental Planning and Assessment  
111 North Hope Street  
Los Angeles, CA 90012

Dear Mr. Gonzalez:

**NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT, "DE SOTO TANKS PROJECT," IS A WATER STORAGE PROJECT TO PROVIDE ADDITIONAL LOCAL STORAGE AND INCREASE OPERATIONAL EFFECTIVENESS, RELIABILITY, AND FLEXIBILITY; SYSTEM REDUNDANCE; AND EMERGENCY SUPPLY TO THE WEST SAN FERNANDO VALLEY, 11200 DE SOTO AVENUE, CHATSWORTH, FFER 201700164**

The Notice of Preparation of a Draft Environmental Impact Report 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.

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS	BRADBURY	CUDAHY	HAWTHORNE	LA HABRA	LYNWOOD	PICO RIVERA	SIGNAL HILL
ARTESIA	CALABASAS	DIAMOND BAR	HIDDEN HILLS	LA MIRADA	MALIBU	POMONA	SOUTH EL MONTE
AZUSA	CARSON	DUARTE	HUNTINGTON PARK	LA PUENTE	MAYWOOD	RANCHO PALOS VERDES	SOUTH GATE
BALDWIN PARK	CERRITOS	EL MONTE	INDUSTRY	LAKEWOOD	NORWALK	ROLLING HILLS	TEMPLE CITY
BELL	CLAREMONT	GARDENA	INGLEWOOD	LANCASTER	PALMDALE	ROLLING HILLS ESTATES	WALNUT
BELL GARDENS	COMMERCE	GLEN DORA	IRWINDALE	LAWNDALE	PALOS VERDES ESTATES	ROSEMEAD	WEST HOLLYWOOD
BELLFLOWER	COVINA	HAWAIIAN GARDENS	LA CANADA-FLINTRIDGE	LOMITA	PARAMOUNT	SAN DIMAS	WESTLAKE VILLAG
						SANTA CLARITA	WHITTIER

**LAND DEVELOPMENT UNIT:**

This project is located entirely in the City of Los Angeles, Chatsworth. Therefore, the City of Los Angeles Fire Department has jurisdiction concerning this project and will be setting conditions. This project is located in close proximity to the jurisdictional area of the Los Angeles County Fire Department. However, this project is unlikely to have an impact that necessitates a comment concerning general requirements from the Land Development Unit of the Los Angeles County Fire Department.

Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department's Land Development Unit, Inspector Nancy Rodeheffer at (323) 890-4243.

The County of Los Angeles Fire Department's Land Development Unit appreciates the opportunity to comment on this project.

**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 or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

**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.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



MICHAEL Y. TAKESHITA, ACTING CHIEF, FORESTRY DIVISION  
PREVENTION SERVICES BUREAU

MYT:ac

