Initial Study/Proposed Mitigated Negative Declaration

First Street
Trunk Line Project

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

October 2005

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Appendices (Bound Separately)

*The full EDR Report is available for inspection at the Los Angeles Department of Water and Power, Environmental Affairs and Economic Development– Environmental Assessment, 111 North Hope Street; Room 1044; Los Angeles, CA 90012.

SECTION 1.0

INTRODUCTION

The following discussion of potential environmental effects was completed in accordance with Section 15063(d)(3) of the CEQA Guidelines (2004) to determine if the project may have a significant effect on the environment.

CEQA INITIAL STUDY FORM

Project Title:

First Street Trunk Line Project

Lead Agency Name and Address:

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

Contact Person and Phone Number:

Sarah Easley Perez
Environmental Assessment
Los Angeles Department of Water and Power
(213) 367-1276

Project Sponsor's Name and Address:

Los Angeles Department of Water and Power
Water Engineering and Technical Services
111 North Hope Street, Room 1356
Los Angeles, CA 90012

Project Location:

Public street rights-of-way within the Wilshire and Westlake communities of the City of Los Angeles (see Section 2.1 for details).

City Council Districts:

Districts 4 and 13

Neighborhood Council Districts:

Wilshire Center-Koreatown, Greater Wilshire, and Rampart Village Neighborhood Council Districts.

General Plan Designation:

The proposed project would directly affect the City of Los Angeles General Plan Public Streets designation. The project would include a linear pipeline which would traverse under existing streets through areas of multiple land use designations including: Public Facilities, Industrial, Commercial, Multiple Family Residential and Single Family Residential in the Wilshire and Westlake Community Plan areas.

Zoning:

The zoning designations vary along the proposed alignment, and include Public Facilities, Industrial, Commercial, Multiple Family Residential and Single Family Residential designations. Within the Wilshire Community Plan area, a small portion of the proposed linear alignment lies within the Windsor Square Historic Preservation Overlay Zone, and a portion of the proposed linear alignment would pass through an area included within the Vermont/Western Transit Oriented Development Specific Plan Area.

Description of Project:

The Los Angeles Department of Water and Power (LADWP) is proposing to construct approximately 11,000 linear feet (about two miles) of 60-inch diameter concrete-lined welded steel underground potable water pipeline along existing street rights-of way. The proposed project would include the construction of appurtenant structures such as maintenance/access holes, flow meters, vents, valves, cabinets, vaults, a regulator station, and a pressure relief station.

Surrounding Land Uses and Setting:

The proposed pipeline would be located within paved city streets passing through highly urbanized residential, commercial and industrial areas in central Los Angeles.

Agencies That May Have an Interest in the Proposed Project:

Responsible/Trustee Agencies

- California Division of Occupational Safety and Health;
- South Coast Air Quality Management District;
- Los Angeles Regional Water Quality Control Board;
- County of Los Angeles Department of Public Works;
- County of Los Angeles Metropolitan Transportation Authority;
- City of Los Angeles Department of Transportation;
- City of Los Angeles Department of Public Works.

Reviewing Agencies

- California Department of Transportation;
- City of Los Angeles Fire Department;
- City of Los Angeles Police Department.

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 Environmental Impacts discussion in Section 3.0.

☐ Aesthetics	☐ Agriculture Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Geology/Soils
☐ Hazards & Hazardous Materials	☐ Hydrology/Water Quality	☐ Land Use Planning
☐ Mineral Resources	☐ Noise	☐ Population/Housing
☐ Public Services	☐ Recreation	☐ Transportation/Traffic
☐ Utilities/Service Systems	☐ 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 EIR pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Charles C. Holloway — Signature

10/12/05 — Date

Charles Holloway
Supervisor of Environmental Assessment
Los Angeles Department of Water and Power

SECTION 2.0

PROJECT DESCRIPTION

2.1 Project Location

The proposed project would consist of a potable water pipeline and appurtenant structures (maintenance/access holes, flow meters, vents, valves, cabinets, vaults, and an underground regulator station) located within paved city streets and sidewalks in the Wilshire and Westlake communities of central Los Angeles. The linear alignment of the proposed project, beginning at the western end, is as follows:

- First Street from Van Ness Avenue (Hollywood Reservoir Outlet Line) east to Western Avenue;
- Western Avenue from Van Ness Avenue north to First Street;
- First Street from Western Avenue east to Normandie Avenue;
- Normandie Avenue from First Street south to First Street again;
- First Street from Normandie Avenue east to Beverly Boulevard/Commonwealth Avenue;
- Beverly Boulevard from First Street southeast to Dillon Street (Silverlake Reservoir Outlet Line).

Additionally, a pressure relief station would be constructed near the intersection of Dillon and London Street.

2.2 General Setting

The proposed project would be located within an urbanized area in the City of Los Angeles. Land use in the vicinity of the proposed potable water pipeline is predominantly single and multifamily residential with some small-scale commercial uses. Public facilities, including schools (Virgil Junior High School, Belmont New Elementary School #6, and White House Place Primary), a day care center and churches, occur intermittently along the approximate two mile project alignment. The proposed alignment passes over the Los Angeles County Metropolitan Transportation Authority's Red Line subway tunnel. A portion of the proposed linear alignment lies within the Windsor Square Historic Preservation Overlay Zone, and a portion would pass through an area included within the Vermont/Western Transit Oriented Development Specific Plan Area. In addition to residential and commercial uses, public and private facilities that exist within a ¼ mile radius of the proposed alignment include additional schools (Cahuenga Elementary School, Cahuenga Elementary School #1, St. Brendan School, Mc Alister High School, Commonwealth Avenue Elementary School), day care centers, churches, a nursing home, a small park (Robert Burns Park), a recreation center (Shatto Recreation Center), a library (Wilshire Branch Library) and a post office (Oak Wood Station Post Office).

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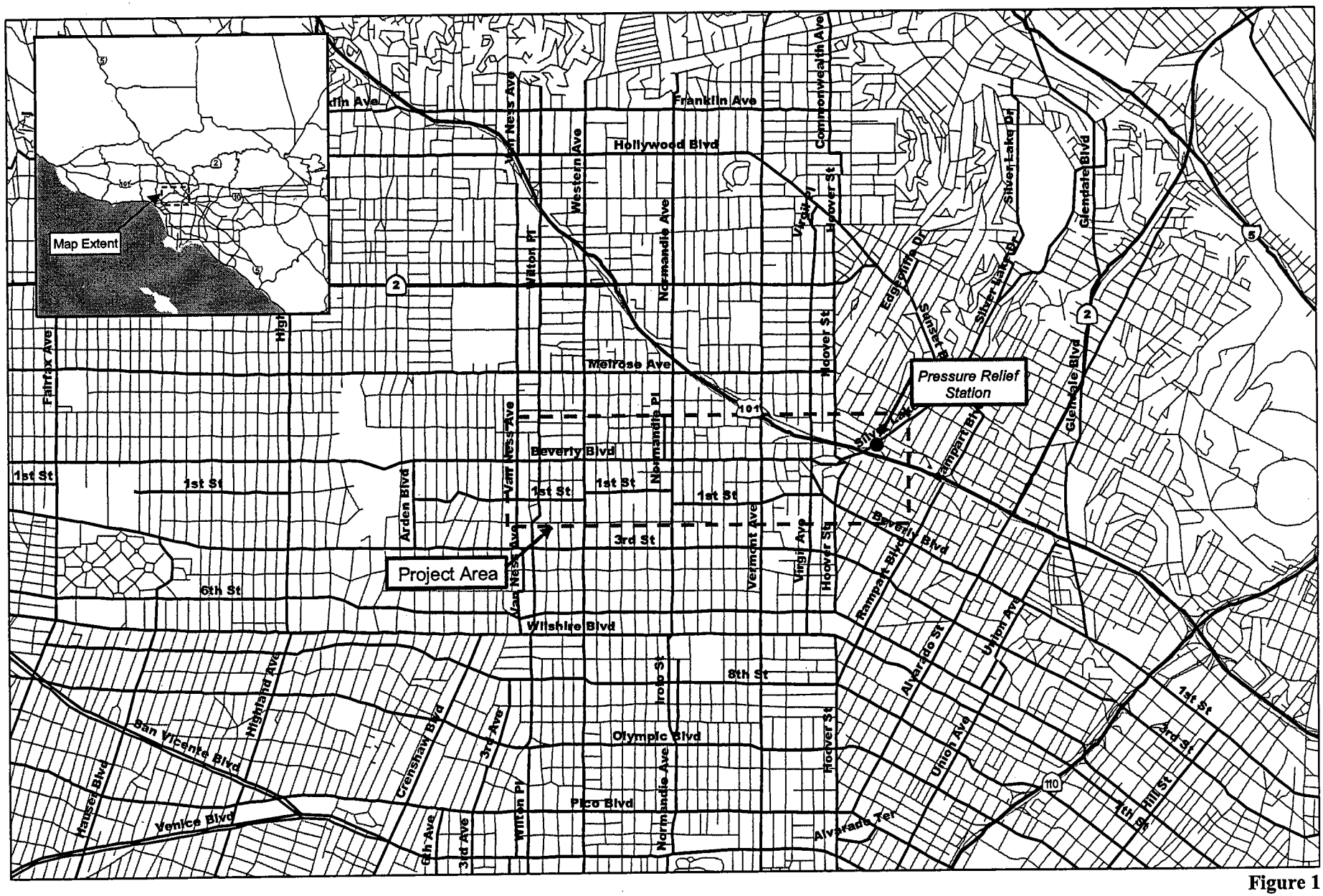

Figure 1
Regional and Vicinity Map

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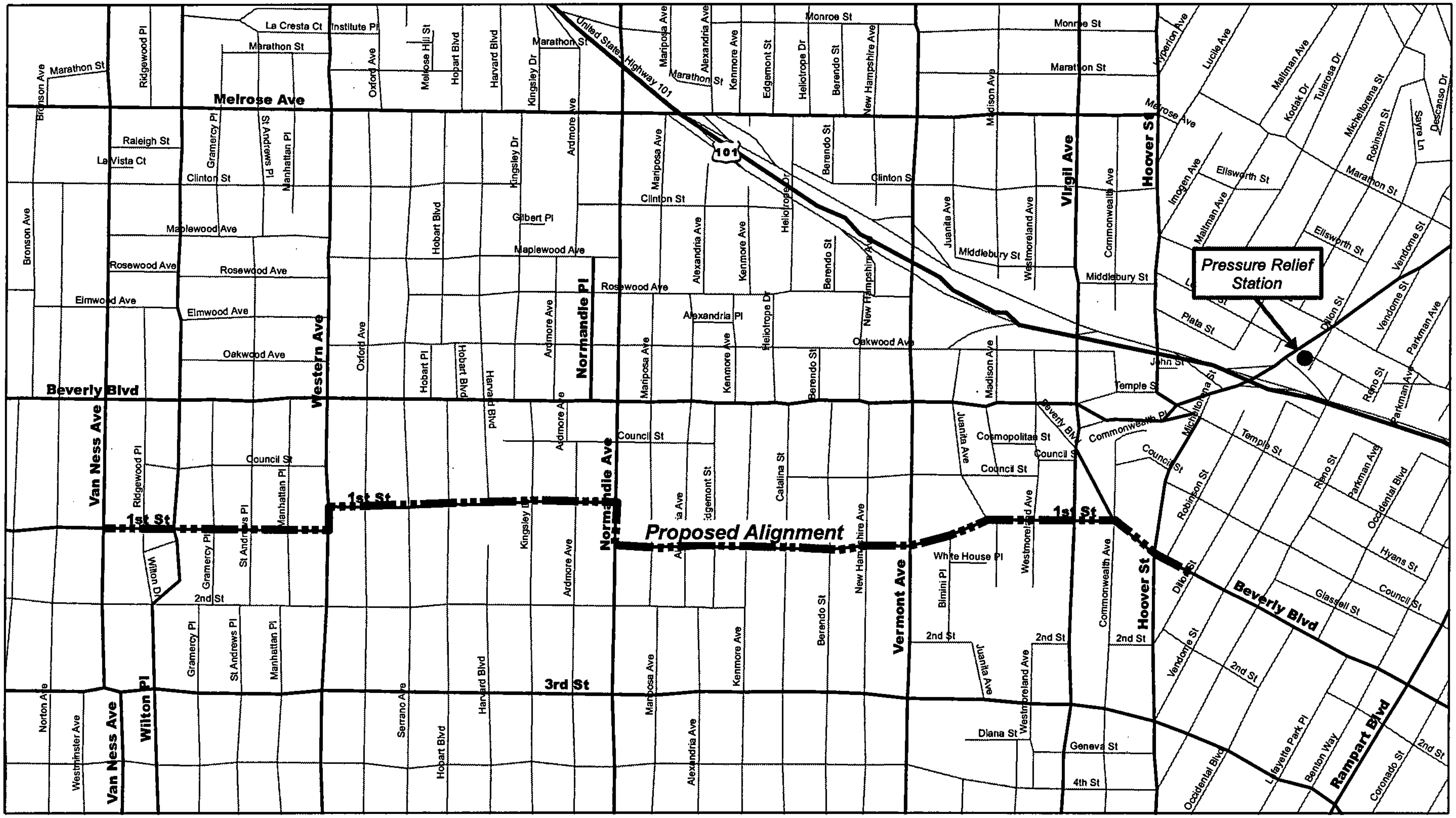

Figure 2
Project Alignment Map

N

1 inch equals 0.25 miles

0 0.25 0.5 Miles

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2.3 Project Objectives

The objectives of the First Street Trunk Line Project are as follows:

- To provide greater water system reliability in the Silver Lake distribution area by interconnecting two previously unconnected trunk lines;
- To provide greater flexibility of the water distribution system within the City of Los Angeles by allowing fro bi-directional flow of water; and;
- To provide an emergency back up supply to the Hollywood Reservoir.

2.4 Project Description

The proposed project would involve the construction of approximately 11,000 linear feet (about 2 miles) of 60-inch diameter concrete-lined welded steel pipeline. Construction of the proposed project would occur along existing street rights-of-way primarily using an open-trench construction method, but a jacking construction method would be used at two busy intersections: at First Street/Vermont Avenue and at First Street/Beverly Boulevard/Commonwealth Avenue, as well as at three additional location to accommodate existing utilities located under the street: near First Street/Manhattan Avenue, at First Street/Madison Street, and at Beverly Boulevard/Hoover Street. The proposed project would also include the construction of appurtenant structures, such as maintenance/access holes, flow meters, vents, valves, cabinets, vaults, a regulator station, and a pressure relief station. Specifically, a underground regulator station, the Beverly/Robinson regulator station, would be constructed near Beverly Boulevard/Robinson Street, and an underground pressure relief station, the Silver Lake pressure relief station, would be constructed near Dillon Street/London Street. Four additional underground vault locations are proposed along the project alignment: near First Street/Van Ness Avenue (for isolation valves), near First Street/Normandie Avenue (for isolation valves), at two locations near Beverly Boulevard/Dillon Street (for a flow meter and for valves). An above ground cabinet, measuring approximately 1 foot by 3 feet and 5 feet tall, will also be installed within the sidewalk right-of-way near each underground vault.

Greater system flexibility and reliability would be achieved through the proposed project by the connection of two previously unconnected trunk lines, the Hollywood Reservoir Outlet Line and the Silver Lake Outlet Line, within the LADWP system. Under emergency conditions, the shallow grade of the proposed pipeline will allow for water flow in the east/west or the west/east directions depending on system pressures. This bi-directional option will allow for emergency back up supply to the Hollywood Reservoir system.

2.5 Construction Methods

Construction of the proposed project would generally occur within delineated work areas Monday through Friday from 7:00 a.m. and 6:00 p.m. and Saturday from 8:00 a.m. and

6:00 p.m. Any construction in areas within existing street rights-of-way not within delineated work areas would occur Monday through Saturday from 9:00 a.m. through 3:30 p.m.. Delineated work areas are work areas within the street right-of way which have been temporarily striped to exclude traffic during the duration (usually several weeks to a couple of months) of the construction operation within a particular area. The construction would proceed primarily using an open-trench construction method, but, where necessary, some portions of the pipeline would be installed using a jacking method. In sequence, the general process for both methods consists of site preparation, excavation and shoring, pipe (and/or appurtenant structure) installation, backfilling if necessary, and street restoration. Both construction methods would require an off-site staging area(s) to temporarily store supplies and materials. The site of the staging area(s) would be determined by the contractor prior to construction.

Open-Trench

An open-trench construction method is typically utilized to install pipelines and their appurtenant structures, including maintenance/access holes, flow meters, valves, cabinets, vaults and regulator stations. In general, the process consists of site preparation, excavation and shoring, pipe installation and backfilling and street restoration. Construction usually progresses along the alignment with a maximum length of open trench at one time being approximately 500 feet in length with a work area of no more than 2,000 linear feet. The following is a description of the phases of construction for open-trench excavation:

Site Preparation. Traffic control plans would be prepared in coordination with the Los Angeles Department of Transportation to detour and delineate the traffic lanes around the work area. The existing pavement along the pipeline alignment would be cut with a concrete saw or otherwise broken and removed using jackhammers, pavement breakers, loaders, or other similar equipment. The pavement would be removed from the project site and recycled or disposed of at an appropriate facility.

Excavation and Shoring. A trench would be excavated along the alignment using backhoes, excavators, or other types of excavation equipment. Portions of the trench adjacent to some utilities could be manually excavated. The excavated soil would be temporarily stored in single rows adjacent to the trenches, stored at off-site staging areas, or immediately hauled away off-site to an approved disposal facility.

The size of the trench for the proposed 60-inch diameter pipeline would be approximately 8 feet wide. In addition, depending on the depth of adjacent substructures along the alignment, the depth of the trench would range from approximately 10 feet to 30 feet below the ground surface**.** As the trench is excavated, the trench walls would be supported, or shored, typically with hydraulic jacks or trench boxes. Steel or wood sheeting between H-beams (e.g., beam and plate) or other similar shoring methods may also be used. Utilities not relocated prior to trenching would be supported in place as excavation and shoring occurs.

If construction is to occur in an area of high groundwater, the groundwater would be removed during trench excavation, typically by being pumped through a hose. The extracted groundwater would be treated for any contaminants, if present, as required before being discharged to the storm drain system under permit issued by the Regional Water Quality Control Board.

Pipe Installation and Backfilling. Once a trench has been excavated and shored, pipelaying would begin. Bedding material, such as sand or slurry, would be placed in the bottom of the trench. Pipe segments would be lowered into the trench and placed on the bedding. The segments would be welded to one another at the joints. The amount of pipe installed in a single day would vary, but is expected to range from 40 to 120 feet per day. Prior to backfilling, appurtenant structures would be installed as necessitated by design. After laying the pipe and welding the joints, the trench would be immediately backfilled with native soils, crushed miscellaneous base, or cement slurry. The maximum trench length left unbackfilled at any time is either 500 feet of trench or the amount of trench that can be completed in one day, which ever is greater...

Street Restoration. Any portion of the roadway affected as a result of proposed construction activities would be repaved and restored in accordance with all applicable City of Los Angeles Department of Public Works standards. Once the pavement has been restored, traffic delineation (lane striping) would also be restored. Typically, an intersection would be affected by open-trench construction for approximately two weeks, but connection points at Van Ness Avenue/First Street and Dillon Street/Beverly Boulevard may take three weeks.

Jacking

A jacking construction method, which utilizes pipe-jacking, a form of tunneling, would be used to avoid traffic disruptions to heavily traveled intersections (at First Street/Vermont Avenue and at First Street/Beverly Boulevard/ Commonwealth Avenue) or to avoid substructure utilities (near First Street/ Manhattan Avenue, at First Street/Madison Avenue and at Beverly Boulevard/Hoover Street). Pipe-jacking is an operation in which the soil ahead of a steel casing is excavated and brought out through the casing barrel while the casing is simultaneously being pushed forward by a horizontal hydraulic jack placed at the rear of the casing. Once the casing is in place underground, pipe is installed within the casing. Jacking and receiving pits are located at either end of a pipe-jacking operation to accommodate equipment operation and soil removal.

Although installation of pipeline using this method avoids the continuous surface disruption common to open-trench construction, some surface disruption would be unavoidable as jacking and receiving pits located in street rights-of-way, with an average size of 12 by 40 feet and 12 by 15 feet respectively, would be necessary. The following is a description of the phases of construction for jacking:

Site Preparation. Traffic control plans would be prepared in coordination with the Los Angeles Department of Transportation to detour and delineate the traffic lanes around

the work area and then implemented. In preparation to construct the jacking and receiving pits, the pavement would be cut using a concrete saw or pavement breaker. As with open-trench excavation, the pavement would be removed from the project site and recycled, reused as a backfill material, or disposed of at an appropriate facility.

Excavation and Shoring. A jacking pit and a receiving pit would be used for each jacking location, one at each end of the jacked pipe segment at either side of the intersecting street. The distance between the pits typically ranges from 200 to 300 feet, but could be longer or shorter depending on site conditions.

For the proposed project, the size of jacking pits would be approximately 12 by 40 feet with an average depth of 30 feet, and the size of receiving pits would be approximately 12 by 15 feet also with an average depth of 30 feet. The pits would be excavated with backhoes, cranes, and/or other excavation equipment. The excavated soil would be immediately hauled away. As excavation occurs, the pits would be shored utilizing a beam and plate shoring system.

Pipe Installation. Once the pits are constructed and shored, a horizontal hydraulic jack would be placed at the bottom of the jacking pit. A 72-inch diameter steel casing would be lowered into the pit with a crane and placed on the jack. A simple cutting shield would be placed in front of the pipe segment to cut through the soil more easily. As the jack pushes the steel casing and cutting shield into the soil, soil would be removed from within the leading casing with an auger or boring machine, either by hand or on a conveyor. Once the casing segment has been pushed into the soil, a new segment would be lowered, set in place, and attached to the casing that has been previously pushed. Installation of the 72-inch diameter steel casing would be expected to progress at approximately 20 feet per day. Once the casing has been installed, the 60-inch diameter carrier pipe would be lowered and placed on the jacks, which would then push the pipe into the steel casing. Installation of the carrier pipe would be expected to progress at approximately 40 feet per day.

Site Restoration. After completion of the pipe installation along the jacking location, the shoring system would be disassembled as the pits are backfilled, the soil compacted and the pavement above replaced. Any portion of the roadway affected as a result of proposed construction activities would be repaved and restored in accordance with all applicable City of Los Angeles Department of Public Works standards. Once the pavement has been restored, traffic delineation (lane striping) would also be restored. Typically, an intersection would be affected by jacking construction for a total of approximately three months.

2.6 Construction Schedule

If approved, the construction of the proposed project is anticipated to commence on or about June 2006 and take approximately 16 months to complete.

2.7 Land Use Consistency

Construction and operation of the proposed project would be consistent with all surrounding land use designations within the project area.

2.8 Environmental Setting

As mentioned previously, the area adjacent to the proposed project is characterized by dense urban development. There are very limited, if any, sensitive natural resources in the vicinity of the project site, though various sensitive receptors (e.g., public and private schools, day care centers, churches, nursing homes, a small park, a recreation center, a library and a post office) exist in close proximity or adjacent to the proposed project.

The proposed alignment passes over the Los Angeles County Metropolitan Transportation Authority's Red Line subway tunnel. Four intersections along the proposed alignment, First Street/Western Avenue, First Street/Normandie Avenue, First Street/Vermont Avenue and First Street/Beverly Boulevard/Commonwealth Avenue, are heavily traveled, and three locations, near First street/Manhattan Avenue, at First Street/Madison Avenue and at Beverly Boulevard/Hoover Street, have substructure utilities that are sensitive to disruption from construction activity.

2.9 Required Permits and Approvals

Permits and/or necessary approvals may be required from the following agencies for the activities described:

- State of California Division of Occupational Safety and Health – permit for construction of trenches and excavations and underground classification for jacking operations.
- South Coast Air Quality Management District – site specific permit under Rule 1166 for work areas contaminated with volatile organic compounds;
- Los Angeles Regional Water Quality Control Board – permits for general construction runoff, construction dewatering discharges, pipeline hydrostatic testing and/or groundwater discharges under the National Pollutant Discharge Elimination System (NPDES);
- Los Angeles County, Department of Public Works – permits for construction, excavation and/or encroachment within road rights-of-way; permit for discharges into storm system and channels;
- Los Angeles County Metropolitan Transportation Authority – approval for crossing Red Line subway tunnel;
- City of Los Angeles, Department of Transportation – approval for temporary lane-street closures and traffic/transportation issues during construction;
- City of Los Angeles, Department of Public Works – permit for excavation activities within the public right-of-way

SECTION 3.0

DISCUSSION OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

INTRODUCTION

The following discussion addresses impacts to various environmental resources, per the Initial Study Checklist questions contained in Appendix G of the State CEQA Guidelines. In some instances, one response addresses two or more checklist questions.

I. AESTHETICS

Would the project:

a) Have a substantial adverse effect on a scenic vista?

No Impact. The proposed project alignment is located in a developed urban area and is surrounded by single- and multi-family residences uses, commercial uses, and various public facilities (e.g., schools, churches, day care centers, a small park, a recreation center, a library and a post office). No scenic vistas exist within the area of the proposed project; therefore, the construction and operation of the project would not have any effect on scenic vistas.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. No scenic resources (including, but not limited to, trees, rock outcroppings and historic buildings within a state scenic highway) exist along or near the proposed project. Roadways that provide scenic views within and around the City of Los Angeles are classified by the County of Los Angeles and State of California Department of Transportation as officially designated scenic highways or corridors. The proposed project alignment is not located in the vicinity of officially designated scenic highways or corridor. The closest officially designated scenic highway to the proposed project is US Route 110, the Arroyo Seco Parkway, which is approximately 1.9 miles east of the project. Therefore, no impacts to scenic highways or other scenic resources would result from construction or operation of the proposed project.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

Less Than Significant Impact. The proposed project would involve the construction of approximately two miles of underground pipeline with appurtenant structures. Visual impacts to the surrounding community would occur temporarily during the sixteen month construction phase. Because the pipeline would be underground, operation of the pipeline would not affect the visual character of any community in the vicinity of the project. Some of the appurtenant structures (such as air vacuum valves, vents and cabinets) would be aboveground, within the sidewalk portion of the public right-of-way, and are necessary for the operation and maintenance of the pipeline. These structures would be placed, as necessary, along the alignment. These structures are common elements of the urban environment. No above ground structures would be located within the Windsor Square Historic Preservation Overlay Zone.

d) Create new source of substantial light or glare that would adversely affect day or nighttime views in the area?

Less Than Significant Impact. The proposed project would be located in an area developed with several urban uses, including residential, commercial, religious, medical and educational, as well as being located within roadways (including Class II Highways and secondary, collector, and local streets). External and internal night and day illumination is already in place within the project area. The proposed project would involve the construction of an underground water pipeline and appurtenant structures; the construction phase would be temporary and activities would only occur during daylight hours. However, traffic control and safety measures, such as barriers, reflective signs, and flashing warnings would be implemented, as necessary, and could introduce lights and/or glare to the surrounding area, but only on a temporary basis (during construction). Operation of the pipeline portion of the proposed project would occur below the surface; therefore, no light or glare impacts would occur. Operation of the appurtenant structures would not create or require new sources of light or glare; therefore, only less than significant impacts would occur.

II. AGRICULTURE RESOURCES

Would the project:

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?

See item c) below.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

See item c) below.

c) Involve other changes in the existing environment which, due to their location or nature, could result in the conversion of Farmland, to non-agricultural use?

No Impact. The proposed project would be located in a developed area and surrounded by single- and multi-family residences, as well as other commercial, public facilities, and open space uses. There is no Prime, Unique Farmland, or Farmland of Statewide Importance (Farmland) on, or in the vicinity of, the proposed project, therefore there would be no potential for the construction or operation of the project to convert farmland, either directly or indirectly, to non-agricultural use. No piece of land in the surrounding vicinity is zoned for agricultural uses or enrolled in a Williamson Act contract. The construction and operation of the proposed project does not involve changes to the existing environment that could result in the conversion of Farmland to non-agricultural use.

III. AIR QUALITY

Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan (e.g., the SCAQMD Plan or Congestion Management Plan)?

No Impact. The South Coast Air Quality Management District (SCAQMD) and the Southern California Association of Governments (SCAG) have responsibility for preparing an Air Quality Management Plan (AQMP) which addresses federal and state Clean Air Act requirements. The AQMP details goals, policies, and programs for improving air quality and establishes thresholds for daily operation emissions. Environmental review of individual projects within the region must demonstrate that daily construction and operational emissions thresholds as established by the SCAQMD would not be exceeded, nor would the number or severity of existing air quality violations be increased. With proposed mitigation, the construction and operation of the proposed project is not anticipated to exceed the AQMP's daily emission thresholds, as discussed in item c) below, and would therefore not conflict with or obstruct implementation of the AQMP.

The construction and operation of the proposed project is being undertaken to help meet the needs of LADWP for water system operation and reliability. The implementation of the proposed project would not affect population, housing units, or employment, and would thus be consistent with SCAG's Growth Management Plan. The proposed project would not have an impact on the type, size, or location of transportation infrastructure in the long-term, and would thus be consistent with SCAG's Regional Mobility Plan. There are

no Los Angeles County Metropolitan Transportation Authority (MTA) Congestion Management Plan (CMP) arterial corridors or intersections along the proposed project. No such arteries, intersections, or freeway onramps or offramps would be affected by project construction activities or by operation of the proposed project (see Section XV, Transportation/Traffic, on page 3-29 for further discussion of related traffic issues). As such, no impacts to the local or regional air quality or congestion management plans would occur.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

See item c), below.

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)?

Less Than Significant with Mitigation Incorporated. State and federal agencies have set ambient air quality standards for various pollutants. Both California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS) have been established to protect the public health and welfare (see Table A-1 in Appendix A).

Based on Section 182(e) of the Federal Clean Air Act, the SCAQMD has set significance thresholds for five criteria pollutants. The SCAQMD significance threshold criteria are shown in Table III-1.

Table III-1
SCAQMD Air Quality Significance Thresholds

Pollutant	Construction Phase (lbs/day)	Operational Phase (lbs/day)
Volotile Organic Compounds (VOCs)/ Reactive Organic Gas (ROG)	75	55
Carbon Monoxide (CO)	550	550
Nitrogen Oxides (NO_x)	100	55
Sulfur Oxides (SO_x)	150	150
Particulates (PM_{10})	150	150
Source: SCAQMD, Air Quality Analysis Guidance Handbook, 2005.		

Specific geographic areas are classified as either “attainment” or “nonattainment” areas for each criteria pollutant based on the comparison of measured data with federal and state standards. If an area is redesignated from nonattainment to attainment, the Federal Clean Air Act (CAA) requires a revision to the State Implementation Plan (SIP), a maintenance plan which demonstrates how the air quality standard will be maintained for at least 10 years. Federal and state attainment designations are shown in Table A-2 in Appendix A.

The SCAQMD, the regional agency that regulates stationary sources, maintains an extensive air quality monitoring network to measure criteria pollutant concentrations throughout the Basin. The closest air monitoring station to the project is the Central Los Angeles Monitoring Station, located at 1630 North Main Street in the City of Los Angeles. A summary of the air quality data from this monitoring station is summarized in Table A-3 in Appendix A.

Construction Emissions

The air quality impacts of construction activities were evaluated using methods recommended in the latest Sacramento Metropolitan Air Quality Management District (SMAQMD) Road Construction Model Version 5.1 (2005) and the URBEMIS2002 air quality model for mobile source and construction equipment emissions. Refer to Appendix B for air quality calculations.

Temporary air contaminant emissions would result from the use of construction equipment and construction worker vehicles. Construction activities (site preparation through street restoration phases) are expected to consist of operation of one excavator, one loader, one backhoe, one compactor, one crane, one paver, signal boards, one roller, and six other vehicles at each construction site; and several (24 assumed) construction worker vehicles that would be traveling to and from each site from the nearest LADWP facility. Up to two construction sites would be in construction at any one time. On a typical workday, workers would travel directly to one of the predetermined staging areas, where they would gather equipment and proceed in work crews to the construction site along the alignment. Additionally, diesel emissions would result from truck trips associated with supply delivery (including pipeline sections), transport of excavated soil from trenching (soil would be transported to the closest appropriate LADWP facility, as is standard LADWP practice, for reuse or ultimate disposal), and transport of backfill and paving materials to the site. It is assumed that such truck operations would require 6 trucks to travel 20 miles per day, or an equivalent mix of trucks and trips, to a maximum of 120 miles per day. Equipment anticipated for use in each phase of pipeline construction is shown in Table A-4 in Appendix A.

In addition, a proposed pressure relief station vault would be expected to begin construction in July 2006. Construction of the relief station would overlap with the construction phase of the pipeline for approximately 5 months. Construction of the relief station would consist of one excavator, one loader, two cranes, one dump truck, one tractor, two utility trucks, one flat-bed truck, one welding truck, one ventilation blower, one generator, one water truck, one drill rig, one back hoe, one concrete pump, one paver and one grader. Approximately 9000 CY of fill would be exported off site. Soil hauling would consist of approximately 22 trucks, with an average of 2.5 trips for each truck per day. It was assumed that roundtrip haul trip lengths are 20 miles.

Equipment anticipated for use in each phase of construction for the relief station is shown in Table A-5 in Appendix A.

Project-related construction traffic and operation of diesel equipment would have a temporary effect on air quality in the vicinity of the proposed project. Construction worker vehicles and diesel-powered equipment would emit NO_x, CO, ROCs, and PM10. Emissions of SO_x and lead would be negligible in comparison with the other pollutants, and are not calculated.

Pollutant emissions were estimated separately for each phase of the pipeline and relief station activities. Data input and output for the calculations are included as Appendix A. Table III-2 shows the results of the calculations. Emissions of NO_x would exceed the construction thresholds established by the SCAQMD. Consequently, mitigation is required to reduce NO_x emissions below those thresholds. Unmitigated PM_{10} ,CO, ROG emissions are less than the SCAQMD thresholds; therefore, mitigation measures are not required by SCAQMD for these emissions.

Table III-2 Estimated Maximum Construction Emissions (Unmitigated)				
	Estimated Emissions (lbs/day/)			
	ROG	NO_x	CO	PM_{10}
Pressure Relief Station Construction				
Site Preparation/Excavation and Shoring Phase	7	52	53	3
Onsite Construction Phase\Installation Phase	3	18	16	2
Street Restoration Phase	1	11	8	1
Pressure Relief Station Construction Maximum Emissions*	**7**	**52**	**53**	**3**
Pipeline Construction for Two Pipeline Sites				
Site Preparation/Excavation and Shoring Phase	8	48	48	4
Onsite Pipeline Construction Phase\Installation Phase	10	50	52	4
Street Restoration Phase	9	47	43	3
Pipeline Construction Maximum Emissions for Two Pipeline Sites**	**10**	**50**	**52**	**4**
Maximum Daily Emissions for Simultaneous Construction of the Pressure Relief Station and Two Pipeline Sites***	**17**	**102**	**105**	**7**
SCAQMD Thresholds	**75**	**100**	**550**	**150**
Exceeds SCAQMD Thresholds?	No	Yes	No	No

Notes: The road construction model was used as a tool to estimate construction emissions. Emissions were based on equipment usage estimates shown in Table 5 and 6.

*The Pressure Relief Station Maximum Emissions represents the worst-case maximum emissions day for the construction of the pressure relief station.

**The Pipeline Maximum Emissions for Two Pipeline Sites represents the worst-case maximum emissions day for the concurrent construction of *two* pipeline sites.

*** Due to scheduling of construction activities, construction of up to two separate pipeline sites along the alignment and construction of the proposed regulator station may occur simultaneously. The Maximum Daily Emissions for Simultaneous Construction was calculated by adding the Pipeline Maximum Emission for Two Pipeline Sites and the Pressure Relief Station Maximum Emissions. It represents the worst-case maximum emissions day for any of the construction scenarios.

Source: Road Construction Model Version 5.1 SMAQMD, 2005, and URBEMIS 2002

Mitigation measures are available to reduce NO_x emissions to a level below the significance threshold of 100 pounds per day. Implementation of the following mitigation measures would reduce emissions for NO_x.

AQ -1 During pipe installation, aqueous diesel fuel shall be used in all off-road and on-road diesel equipment.

Residual Construction Impacts

The implementation of air quality mitigation measures would reduce NOx emissions from the proposed project. Implementation of Mitigation Measure 1 would reduce NOx emissions to a less-than-significant levels. Table III-3 shows the maximum emissions resulting from construction activities after the implementation of the mitigation measures described above.

Table III-3
Estimated Maximum Construction Emissions with Mitigatation

	Estimated Emissions (lbs/day/)			
	ROG	**NO_x**	**CO**	**PM_{10}**
Pressure Relief Station Construction				
Site Preparation/Excavation and Shoring Phase	7	45	53	1
Onsite Construction Phase\Installation Phase	3	15	16	1
Street Restoration Phase	1	9	8	0
Pressure Relief Station Construction Maximum Emissions*	**7**	**45**	**53**	**2**
Pipeline Construction for Two Pipeline Sites				
Site Preparation/Excavation and Shoring Phase	8	41	48	1
Onsite Pipeline Construction Phase\Installation Phase	10	43	52	1
Street Restoration Phase	9	40	43	1
Pipeline Construction Maximum Emissions for Two Pipeline Sites**	**10**	**43**	**52**	**1**
Maximum Daily Emissions for Simultaneous Construction of the Pressure Relief Station and Two Pipeline Sites***	**17**	**88**	**105**	**3**
SCAQMD Thresholds	**75**	**100**	**550**	**150**
Exceeds SCAQMD Thresholds?	No	No	No	No

Notes: The road construction model was used as a tool to estimate construction emissions. Emissions were based on equipment usage estimates shown in Table 5 and 6.

*The Pressure Relief Station Maximum Emissions represents the worst-case maximum emissions day for the construction of the pressure relief station with NOx emissions reduction mitigation.

**The Pipeline Maximum Emissions for Two Pipeline Sites represents the worst-case maximum emissions day for the concurrent construction of *two* pipeline sites with NOx emissions reduction mitigation.

*** Due to scheduling of construction activities, construction of up to two separate pipeline sites along the alignment and construction of the proposed regulator station may occur simultaneously. The Maximum Daily Emissions for Simultaneous Construction was calculated by adding the Pipeline Maximum Emission for Two Pipeline Sites and the Pressure Relief Station Maximum Emissions. It represents the worst-case maximum emissions day for any of the construction scenarios with NOx emissions reduction mitigation.

Source: Road Construction Model Version 5.1 SMAQMD, 2005, and URBEMIS 2002

Construction emissions would be short-term in nature, and would be limited only to the 16-month period estimated to complete installation. The construction emissions analysis incorporated conservative assumptions. For

example, all 24 workers were assumed to drive their own vehicle 20 miles round-trip each workday, two pipeline construction areas and one relief station area were assumed to be under construction at one time, and worst-case conditions for fugitive dust generation were assumed (i.e., high wind conditions with minimal, if any, soil stabilization). As such, construction emissions are not expected to add to long-term air quality degradation. Emissions would increase local concentrations temporarily but would not increase the overall number of violations of air quality standards. Further, the proposed project would comply with provisions of the most recently-adopted SCAQMD Rule 403 (Fugitive Dust), as applicable. SCAQMD provisions of Rule 403 that will be applied to the project are summarized as follows:

Rule 403 Provisions:

1. A person shall not cause or allow the emissions of fugitive dust from any active operation, open storage pile, or disturbed surface area such that the presence of such dust remains visible in the atmosphere beyond the property line of the emission source.
2. A person conducting active operations within the boundaries of the South Coast Air Basin shall utilize one or more of the applicable best available control measures to minimize fugitive dust emissions from each fugitive dust source type which is part of the active operation.
3. A person conducting active operations outside the boundaries of the South Coast Air Basin may utilize reasonably available control measures in lieu of best available control measures to minimize fugitive dust emissions from each fugitive dust source type which is part of the active operation.
4. A person shall not cause or allow PM_{10} levels to exceed 50 micrograms per cubic meter when determined, by simultaneous sampling, as the difference between upwind and downwind samples collected on high-volume particulate matter samplers or other U.S. EPA-approved equivalent method for PM_{10} monitoring. If sampling is conducted, samplers shall be:
    a. Operated, maintained, and calibrated in accordance with 40 Code of Federal Regulations (CFR), Part 50, Appendix J, or appropriate U.S. EPA-published documents for U.S. EPA-approved equivalent method(s) for PM_{10}.
    b. Reasonably placed upwind and downwind of key activity areas and as close to the property line as feasible, such that other sources of fugitive dust between the sampler and the property line are minimized.

5. Any person in the South Coast Air Basin shall:

    a. Prevent or remove within one hour the track-out of bulk material onto public paved roadways as a result of their operations; or

    b. Take at least one of the actions listed in Table 3 of Rule 403 and:

        i. Prevent the track-out of bulk material onto public paved roadways as a result of their operations and remove such material at anytime track-out extends for a cumulative distance of greater than 50 feet on to any paved public road during active operations; and

        ii. Remove all visible roadway dust tracked-out upon public paved roadways as a result of active operations at the conclusion of each work day when active operations cease.

Operation Emissions

Operation of the proposed project would not generate any emissions of criteria pollutants, as the pipeline, valve vaults, and regulator station would be underground and would transport water under pressure without the use of pollutant-generating equipment. As such, no operational air quality impacts would result from the proposed project.

d) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. The proposed project would be bordered by sensitive receptors, namely single- and multi-family residences, and other pollutant-sensitive uses (e.g., schools, day care centers, a nursing home, a small park and a recreation center). Since daily construction emissions would be below significance thresholds and construction activities would be temporary in duration, impacts to sensitive receptors from construction-related air emissions would be less than significant. In addition Rule 403 would minimize fugitive dust as described above. The operation of the proposed project would not result in a significant impact to adjacent sensitive receptors, because operation of the proposed project would not generate vehicle trips or produce air emissions.

Additionally, potential air contaminants emissions due to the excavation and storage of petroleum-contaminated soil would be controlled through a Contaminated Soil Mitigation Plan as required by the SCAQMD Site Specific Permit under Rule 1166.

e) Create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. Any odors (e.g., odors from construction vehicle emissions) will be controlled in accordance with SCAQMD Rule 402 (Nuisance Emissions). During project construction, paving will occur to

restore streets after pipe installation and backfilling. Paving activities omit odors that would be experienced by people in the immediate vicinity. Paving activities would occur at the end of project construction in each area and would produce temporary odors. Application of coal tar coatings for some pipe and appurtenances required for corrosion protection would also produce temporary odors. Other than paving , coal tar application and construction vehicle operation, no activities are anticipated to occur, and no materials or chemicals would be stored on-site, that would have the potential to cause odor impacts during the construction and use of the proposed project and appurtenant structures. Because paving, coal tar application and operational of construction vehicles would be temporary, and no objectionable odors would remain after project construction.

IV. BIOLOGICAL RESOURCES

Would the project:

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

No Impact. The proposed project would be located entirely within areas that are presently developed with urban uses such as paved streets and sidewalks. No species identified as a candidate, sensitive, or special status species (including but not limited to plants, fish, insects, animals, and birds) in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service are known to exist on or near the site. Since no known special species have been identified in the project area, there is no potential for substantial adverse direct or indirect effects from construction or operation of the proposed project and no mitigation is required.

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

No Impact. The proposed project alignment does not cross any riparian habitats or other sensitive natural communities identified in local or regional plans, policies or regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service; therefore, there is no potential for impacts on riparian habitat or other sensitive natural communities and no mitigation is required. No substantial adverse direct or indirect effects from construction or operation of the proposed project would occur.

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?

No Impact. No federal or nonfederal wetland habitat (including, but not limited to, marsh, vernal pool, coastal, etc.) has been identified or is known to exist on, or in the vicinity of, the proposed project; therefore, there is no potential for significant construction or operation impacts to wetland habitat and no mitigation is required; therefore, there is no potential for significant construction or operation impacts to wetland habitat.

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/breeding sites?

No Impact. The area surrounding the proposed project is entirely urbanized and the proposed project would operate almost entirely underground; therefore, the construction and operation of the proposed project would not interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors. Also, there is no native wildlife nursery site in the project area.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

See item f) below.

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?

No Impact. The proposed project would be located in a developed urban area, and construction activities would take place almost exclusively along existing street rights-of-way and sidewalks, with the exception of possible staging areas. Staging areas would be at an existing LADWP facility and/or vacant/unoccupied parcel, which would be expected to contain non-native and ornamental species or no vegetation at all. Therefore, the construction and operation of the proposed project are not anticipated to conflict with any local policies or ordinances protecting such resources. Also, the proposed project would not be located within an area affected by or subject to an adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional, or state habitat conservation plan.

V. CULTURAL RESOURCES

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in California Code of Regulations Section 15064.5?

No Impact. A records search was conducted to assess the potential for historical resources within the proposed project area. The search produced twelve City of Los Angeles declared monuments, two National Register of Historic Places (NRHP) registered sites, two NRHP Historic Districts, and one historical resource within ½-mile of the alignment.[1] However, none of these are within the project area.[2] In addition, the proposed project would be located in a developed urban area and construction activities would take place almost exclusively along existing street rights-of-way. No structures would be demolished or altered as a result of the project and the majority of the proposed project (except valves and cabinets) would be underground; no impacts to the setting of any historical resources would occur. The project would not cause a substantial adverse change in the significance of any historical resources.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to California Code of Regulations Section 15064.5?

Less Than Significant with Mitigation Incorporation. No prior archaeological investigations have been conducted in the project area; however, geothermal springs were discovered south of First Street in the late 1890s and were known as the Bimini Baths.[3] In addition, review of historic maps identified trackage for street railway cars within the proposed project area.[4] Although no cultural resources were found during the archaeological review, subsurface archaeological resources may be present within the proposed project area. The areas in proximity to the site of the former Bimini Baths, the Bimini Slough, and their associated geothermal springs could contain buried archaeological resources. Remnants of street railways might also be found below the ground surface and archaeological deposits associated with domestic structures that previously existed or are present today along the alignment may be exposed during construction.[5]

Given that the proposed project area is obscured almost entirely with pavement initially constructed in the early twentieth century, it is impossible to discern if subsurface archaeological deposits are present through archaeological survey. Standard Specifications for Public Works Construction (Greenbook) requires that construction in the area of discovery of an

[1] Garcia and Associates. *Cultural Resources Survey for the Los Angeles Department of Water and Power First Street Trunk Line Project, Los Angeles, California*. June 2005.
[2] Ibid.
[3] Ibid.
[4] Ibid.
[5] ibid.

archaeological resource be suspended until appropriate action can be taken. Adherence to the Greenbook and the implementation of Mitigation CUL-1 would reduce potential impacts to archaeological resources to a less than significant level.

CR-1 Archaeological spot check monitoring shall be conducted during construction in areas with the greatest potential for archaeological resources. These areas include the former Bimin Baths, Bimini Slough, and street railway locales.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant with Mitigation Incorporation. Most of the project area is urban and highly developed. The geologic makeup of the proposed alignment is Late Miocene marine sediments and Pleistocene nonmarine sediments. No unique geologic features are located within the project area and no impacts are anticipated.

A search of paleontological records was conducted for a one-mile area around the proposed alignment for resources. No fossil localities are known from along the alignment; however, the project is mapped as Late Miocene marine Puente Formation which is overlain in part by Pleistocene nonmarine deposits, which are both known to be fossiliferous; the Puente Formation potentially yielding fossils at any depth and the Pleistocene alluvium potentially yielding fossils at depths greater than five feet in the project area.[6] In addition, three vertebrate fossil localities and one invertebrate fossil locality are recorded near the proposed project.[7]

Grading and excavation have the potential to impact significant nonrenewable fossil resources. Standard Specifications for Public Works Construction (Greenbook) requires that construction in the area of discovery of a paleontological resource be suspended until appropriate action can be taken. Adherence to the Greenbook and implementation of Mitigation CUL-2 through CUL-5 would reduce the potential impacts to paleontological resources to a less than significant level.

CR-2 A qualified paleontological monitor shall conduct full time monitoring of construction grading and excavation in native sediments. Monitoring shall include inspection of exposed surfaces and microscopic examination of matrix. The monitor shall have authority to divert grading away from exposed resources temporarily in order to recover the specimens.

[6] Cogstone Resource Management Inc. *Paleontological Resources Assessment Report for the First Street Trunk Line Project, City of Los Angeles, California*. June 2005.
[7] Ibid.

CR-3 Should a discovery be made which meets the criteria for a fossil locality, work shall be diverted until the Paleontological Field Supervisor or Principal Investigator evaluates the discovery. Localities require documentation including location and stratigraphic information. Should microfossils be discovered, the monitor shall collect matrix for processing.

CR-4 Specimens and fossils recovered shall be prepared, identified, and cataloged before donation to the accredited repository designated by the lead agency. Any resources determined not to meet significance criteria shall be offered to local schools for use in education programs.

CR-5 Monthly progress reports and final report shall be filed with the client and the lead agency. The report shall include a list of resources recovered, documentation of each locality, interpretation of resources recovered and shall include all specialist's reports.

d) Disturb any human remains, including those interred outside of formal cemeteries?

No Impact. No prehistoric sites have been identified within the project area. Accordingly, there is no evidence that human remains are located along the proposed alignment. Should human remains be encountered, all work would cease and the county coroner would be contacted per Greenbook and State of California law. Should the remains be identified as Native American, the Native American Heritage Commission would be contacted within 48 hours to provide a Most Likely Descendent (MLD) to determine reburial practices for the remains. Adherence to this policy would ensure that no impacts to human remains, including those buried outside of formal cemeteries would occur.

VI. GEOLOGY AND SOILS

Would the project:

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.

No Impact. The proposed project is not located within the boundaries of any state designated Alquist-Priolo Special Studies Zone.[8] In addition, the alignment is not within a State of California Special Studies Zone for earthquake faults.[9] The construction and operation of the proposed

[8] City of Los Angeles, *General Plan, Safety Element Exhibit A,* "Alquist-Priolo Special Studies and Fault Rupture Areas."
[9] Ninyo & Moore, *Geotechnical Reconnaissance Report (Technical Report) First Street Trunk Line Project (Los Angeles Department of Water and Power) Los Angeles, California*. June 29, 2005.

project would therefore not expose people or structures to potential adverse effects from the rupture of a known earthquake fault.

ii) Strong seismic ground shaking?

Less Than Significant Impact. Seismic activity on area faults may result in groundshaking at the project site. Seismic hazard from groundshaking is typical for many areas of Southern California. The Hollywood fault, located three miles north of the alignment, is capable of generating a magnitude 6.5 earthquake[10]. Such a major earthquake would produce significant seismic shaking along the proposed alignment. However, the potential for seismic activity would not be greater than for much of the City of Los Angeles. All pipeline structures and elements would be constructed in compliance with earthquake-resistant standards per LADWP standard practices. The fact that the proposed pipeline is underground minimizes the potential for above-ground impacts, and below-ground impacts would be limited to the area surrounding the point of pipe failure to a shallow depth. Therefore, the proposed project would not increase the risk of exposure of people or structures to strong seismic ground shaking.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Depending on the levels of ground shaking, groundwater conditions, the relative density of soils, and the age of the geologic units in the area, the potential for liquefaction may vary in the City of Los Angeles. Seismic-related ground failure, including liquefaction, occurs when a saturated, granular deposit of low relative density is subject to extreme shaking and loses strength or stiffness due to increased pore water pressure. The consequences of liquefaction are expected to be predominantly characterized by settlement or uplift of structures, and increase in lateral pressure on buried structures.

The proposed alignment is not located within an area with a historic occurrence of liquefaction or ground displacement.[11] However, based on possible seismic accelerations, the potential for relatively shallow groundwater, and the potential for relatively loose, sandy alluvium underlying portions of the alignment, a potential for liquefaction was identified.[12] In addition, two portions of the proposed project alignment (i.e., in the area of First Street/Western and in the area of First Street/Virgil Avenue) are located in areas that have been identified to be susceptible to liquefaction[13]. However, subsequent soil sampling along the proposed alignment was conducted to test for liquefaction potential, and testing

[10] Ninyo & Moore, *Geotechnical Reconnaissance Report (Technical Report) First Street Trunk Line Project (Los Angeles Department of Water and Power) Los Angeles, California*. June 29, 2005.
[11] State of California, *Seismic Hazard Zones map, Hollywood Quadrangle*.
[12] Ninyo & Moore, *Geotechnical Reconnaissance Report (Technical Report) First Street Trunk Line Project (Los Angeles Department of Water and Power) Los Angeles, California*. June 29, 2005.
[13] City of Los Angeles, *General Plan, Safety Element Exhibit B,* "Areas Susceptible to Liquefaction in the City of Los Angeles."

determined that liquefaction in these areas is unlikely[14]. Nevertheless, the proposed pipeline and appurtenances would be constructed to meet applicable seismic safety standards. Furthermore, trenches and other excavations would be backfilled with engineered fill, which meets compaction and shear strength requirements, and has little liquefiable potential.

A majority of the proposed project would operate as an underground structure. Due to the fact that the proposed project would be constructed to meet applicable seismic safety standards, and backfilled material would be engineered to meet compaction and shear strength specifications, no impact from an increase in lateral pressure is anticipated. Therefore, no significant impacts would occur that would expose people or structures to risk of substantial adverse effects from liquefaction.

iv) Landslides?

No Impact. Landslides and other slope failures are common occurrences during or soon after earthquakes. The project sites and surrounding areas are relatively flat. In the absence of significant ground slopes and because the pipeline would be interred below grade, the potential for seismically induced landslides to affect the sites is considered to be negligible. According to the City of Los Angeles General Plan Safety Element, the proposed project site is not located in, or in proximity to, an area potentially susceptible to landslides and no indication of previous landslide movement has been observed.[15,16]

b) Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. The construction and operation of the proposed project would occur along previously disturbed areas, which consist of sections of paved streets. During construction, short-term erosion impacts could occur as a result of excavation from construction activities. These exposed soils could potentially cause erosion impacts during windy conditions and from construction vehicles traveling through the site. Heavy rains could cause the exposed soils to run off into public right-of-ways and/or storm drainage systems. The contractor would develop and implement a plan to control erosion of soil from the site during construction. Because the proposed project site has been previously excavated and highly urbanized, significant losses of topsoil are not anticipated. The development and implementation of an erosion control plan would keep impacts resulting from construction to less than significant levels. Operation of the proposed project would be passive; therefore, no additional impact on soil erosion or loss of topsoil would occur.

[14] Los Angeles Department of Water and Power, *First Street Trunk Line Geotechnical and Geology Report,* May 25, 2005.
[15] City of Los Angeles, *General Plan, Safety Element Exhibit C,* "Landslide Inventory & Hillside Areas In the City of Los Angeles."
[16] State of California, *Seismic Hazard Zones map, Hollywood Quadrangle*.

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?

Less Than Significant with Mitigation Incorporation. As discussed above in Section VI(a)iii, liquefaction and associated settlement is unlikely along the proposed alignment. The proposed pipeline and appurtenances would be constructed to meet applicable seismic safety standards and trenches and other excavations would be backfilled with engineered fill, which meets compaction and shear strength requirements, and has little liquefiable potential. Therefore, no significant impacts would occur that would expose people or structures to risk of substantial adverse effects from liquefaction or lateral spreading.

Subsidence is the lowering of surface elevation due to changes occurring underground. In the arid southwest, subsidence can be associated with earth fissures, cracks in the ground surface that form from horizontal movement of sediment and can be more than 100 feet deep. Landsliding at the site was not indicated during field reconnaissance and historical landsliding is not indicated on a seismic hazard zone map for the area along the alignment.[17,18] Accordingly, the potential for large scale slope instability and failure, including landslides or subsidence is considered less than significant.

While the potential for unstable soil is considered to be less than significant, the relatively high groundwater and relatively loose, sandy material indicate a slight potential for dynamic settlement along portions of the proposed alignment. Mitigation GEO-1 is provided to reduce potential impacts to a less than significant level.

GEO-1 A baseline geotechnical evaluation, including project-specific subsurface exploration and laboratory testing shall be conducted at settlement sensitive structures prior to design and construction of the proposed pipeline. This shall include the tunnel associated with the Metropolitan Transit Authority's Red Line subway where it crosses the proposed alignment. The purpose of the subsurface evaluation shall be to further assess the subsurface conditions and to provide site-specific information pertaining to the engineering characteristics of earth materials and groundwater conditions.

[17] Ninyo & Moore, *Geotechnical Reconnaissance Report (Technical Report) First Street Trunk Line Project (Los Angeles Department of Water and Power) Los Angeles, California*. June 29, 2005.
[18] State of California, *Seismic Hazard Zones map, Hollywood Quadrangle.*

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?

Less Than Significant Impact. The proposed project would be located in a highly urbanized/developed area, and construction activities and operation would occur almost exclusively along previously disturbed areas. As discussed in item a) above, two portions of the proposed project alignment (i.e., in the area of First Street/Western and in the area of First Street/Virgil Avenue) are located in areas susceptible to liquefaction. These areas are characterized by recent alluvial deposits. Such soils can exhibit shrink-swell potential (as is characteristic of expansive soils) when exposed to moisture (e.g., groundwater, percolating surface runoff). However, the proposed project would be constructed to meet all applicable Uniform Building Code standards. In addition, all trenches would be properly backfilled with engineered fill, which would be compacted according to Uniform Building Code standards.

e) Have soils incapable of adequately supporting use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The proposed project would not involve soils incapable of adequately supporting the use of a septic tank or alternative wastewater disposal system where sewers are not available for the disposal of wastewater. The project would install a potable water pipe and associated appurtenant structures including flow meters, valves, cabinets, vaults, maintenance/access holes, and a regulator station. No septic tanks or alternative wastewater disposal systems would be used.

VII. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

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

Less than Significant Impact. Although construction of the proposed project would involve the excavation and transport of paving materials (e.g., asphalt, concrete, road bed fill materials) that could possibly be contaminated by vehicle-related pollution (e.g., oil, gasoline, diesel, other automotive chemicals), the project does not involve the routine transport, use, or disposal of hazardous materials. All such materials would be transported and disposed of in accordance with applicable codes and regulations. Such transport and disposal is not expected to create a significant hazard to workers or the community.

The eastern portion of the proposed project alignment, from about First Street/Catalina Street to Beverly Boulevard/Dillon Street, would be located in the vicinity of an area identified as having a presence of oil wells, and, as

such, has been identified as an area of possible soil and groundwater contamination. It is possible that during project construction contaminated soils and groundwater may be encountered. If encountered, contaminated soils and groundwater may need to be transported and/or disposed of during the course of project construction; however, the transport and/or disposal of these materials would result in a less than significant hazard to the public and the environment through compliance with all regulatory requirements for such materials.

In a 200-foot long portion of the project located on Western Avenue, there may be existing abandoned railroad tracks approximately 18 inches below the street surface. Railroad ties found in the excavation may contain creosote or other toxic substances. If buried railroad ties are encountered, they would be segregated from the excavated soil and disposed of in compliance with all applicable regulatory requirements.

Additionally, a Health and Safety Plan would be developed to guide construction activities prior to the commencement of the project. The Health and Safety Plan would meet the requirements of 29 CFR 1910 and all other applicable federal, state, and local regulations and requirements. The plan would contain specific procedures to be used in the event that expected or unexpected contaminants are identified within the project work area. The plan would prescribe safe work practices, contaminant monitoring, personal protective equipment, emergency response procedures, and safety training requirements for the protection of construction workers third parties.

Operation of the proposed project would not require the use, storage, or disposal of hazardous substances. Therefore, the proposed project would not create impacts related to the routine transport, use, or disposal of hazardous materials.

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

No Impact. Implementation of the proposed project would not involve the use, storage, or disposal of explosive or hazardous substances that could result in an upset and accident condition. Before commencing any excavation, the construction contractor would be required to obtain an "Underground Service Alert Identification Number". To minimize potential damage to any existing utilities, the contractor would not be allowed to excavate until all utility owners are notified, and all substructures are clearly identified. As the proposed project would carry potable water, operation would not create a significant hazard to the public or environment involving the release of hazardous materials. No reasonably foreseeable upset or accident conditions that could involve the release of hazardous materials into the environment are anticipated during construction or operation.

c) 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. As discussed in the Air Quality section (starting on page 3-3), operation of construction equipment creates air contaminant emissions. None of these emissions would be generated at levels that are considered hazardous. Construction of the proposed project would also involve the excavation and transport of paving materials (e.g., asphalt, concrete, road bed fill materials) that could possibly be contaminated by vehicle-related pollution (e.g., oil, gasoline, diesel, other automotive chemicals). All such materials would be transported and disposed of in accordance with applicable codes and regulations. Such transport and disposal are not expected to involve acutely hazardous materials, substances, or waste. Contaminated soils, abandoned railroad ties and/or ground water may also be encountered during construction excavation. The implementation of a Health and Safety Plan would address potential hazards posed by these materials, and any transport or disposal of such materials would be in compliance with all regulatory requirements. Although several schools, day care centers, a nursing home, a small park and a recreation center are located within one-quarter mile of the proposed project, with implementation of applicable codes and regulations, construction of the proposed project would have a less-than-significant effect on these facilities.

Operation of the proposed project would not involve hazardous emissions or materials. The proposed project would transport potable water at high pressure under existing street rights-of-way. If there were any emergency condition involving the proposed project the result would involve the release of potable water; therefore, no significant impacts to sensitive receptors are anticipated.

d) Be located on a site which 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. No portion of the proposed project alignment is contained on the lists compiled pursuant to Section 65962.5 of the Government Code; although, as expected in a highly urbanized area, numerous such sites (four Large Quantity Generators and 48 Small Quantity Generators) are located within a quarter mile of the proposed alignment.[19] The proposed project, which is a potable water pipeline and appurtenant structures, would not create a significant hazard to the public or the environment relative to hazardous materials.

[19] Environmental Data Resources, Inc. *ERD DataMap Corridor Study: First Street Trunk Line; Los Angeles, CA 90004.* February 2, 2005

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?

See item f) below.

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 proposed project is not located within an airport land use plan. The closest airport/airstrip to the proposed project site is the Santa Monica Airport (a public airport), located approximately nine miles southwest of the proposed project site. Neither construction nor operation of the proposed project would impact airport operations or pose a safety hazard.

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The proposed project would not impair or physically interfere with an adopted emergency response plan or a local, state, or federal agencies emergency evacuation plan, except for short-term periods during constructiondue to temporary street closures. The on-street construction activities would conform to all City of Los Angeles Department of Transportation (LADOT), Los Angeles Police Department (LAPD), and Los Angeles Fire Department (LAFD) access standards to allow adequate emergency access. Once operational, the proposed project would be underground or in public rights-of-way (e.g., sidewalk) that would not interfere with emergency response or evacuation plans.

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?

No Impact. According to the City of Los Angeles General Plan Safety Element, no Fire Hazard Districts or Fire Buffer Zones, occur along the proposed alignment. No significant areas of brush, grass, or trees are located in the project area, as the area is highly urbanized, is not located in close proximity to any wildlands, and no wildlands are found intermixed. Furthermore, operation of the pipeline would occur passively below ground with little, if any, potential to cause or exacerbate any wildland fires or their impacts to people or structures in the vicinity of the proposed project alignment. As such, construction and operation of the proposed project would not expose any people or structures to a significant risk of loss, injury or death involving wildland fires.

VIII. HYDROLOGY AND WATER QUALITY

Would the project:

a) Violate any water quality standards or waste discharge requirements?

No Impact. The construction and operation of the proposed project would not generate significant amounts of wastewater or increase urban runoff into existing storm drains. During construction, due to the shallow depth of local groundwater, dewatering will be required for pipeline open trench construction and jacking operations. The dewatering rate is expected to be low based on the permeability factors of the soils. This would generate minimal quantities of discharge water, which would be treated as necessary and pumped into existing nearby storm drains. There is a possibility that contaminated groundwater may be encountered as described in Section VII a) above, but the preparation of and implementation of a Health and Safety Plan would ensure compliance with applicable rules and regulations. Additionally, all dewatering discharges would be carried out in accordance with applicable requirements of the Regional Water Quality Control Board, including compliance with the National Pollutant Discharge Elimination Permit (NPDES) system.

Prior to operation of the proposed pipeline, it would be hydrostatically tested and disinfected with chlorine. The test and disinfectant water would be treated pursuant to NPDES permit requirements by the Regional Water Quality Control Board prior to discharge into the storm drain system. During operation, the water supplied by the proposed project would meet all applicable water quality standards. Therefore, no water quality standards or waste discharge requirements would be violated from construction or operation.

b) 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 (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)?

Less Than Significant Impact. During construction, the only groundwater that the proposed project has the potential to deplete would be from dewatering activities. Groundwater is likely to be encountered along the pipeline alignment (as described above), but dewatering would occur in quantities that would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge. The proposed project would serve to increase the reliability and adaptability of the existing LADWP water supply system, and would not contribute to the depletion of groundwater supplies, interfere substantially with groundwater recharge, or lower the level of the groundwater table. As such, less than significant impacts to groundwater supply or recharge are expected.

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?

See item d) below.

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?

No Impact. The proposed project would be constructed under public streets and rights-of-way, and would therefore not alter the existing grade or drainage pattern of the area. The proposed project would not cross any stream or river courses, and as such, construction of the proposed project would not alter any stream or river courses. Neither open-trench or jacking construction methods would substantially increase the rate or amount of surface runoff, or result in flooding on- or off-site. Operation of the proposed project would occur below grade or within public rights-of-way; neither of which occur in the drainage or course of a stream or river.

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?

Less Than Significant Impact. Dewatering that may be required for open trench and jacking operations would contribute minimal amounts of discharge water; however, this water is not expected to be released in substantial quantities, and is not expected to exceed the existing or planned capacity of the local stormwater drainage system. Furthermore, as mentioned above, the discharge water would be treated in accordance with all applicable requirements of the Regional Water Quality Control Board and would be of limited volume. Once the construction of the proposed project has been completed, the pipeline would be hydrostatically tested and disinfected. The test and disinfectant water (approximately 207,000 cubic feet) would be treated pursuant to NPDES permit requirements by the Regional Water Quality Control Board prior to discharge into the storm drain system. Operation of the proposed project would be a closed system that would not create or contribute to runoff water. Consequently, impacts to stormwater systems from increased runoff volumes or polluted runoff due to construction or operation of the proposed project would be less than significant.

f) Otherwise substantially degrade water quality?

Less Than Significant Impact. Potential short-term erosion effects could occur during site excavation and construction activities that could affect

surface water quality with runoff. However, due to the linear nature of the area of the proposed project and limited area of ground disturbance, this effect is expected to be minimal. For dewatering necessary during construction, the water would be treated, as necessary, and discharged into the nearby storm drain system. Any hydrostatic test and disinfectant water necessary would also be treated before discharge into the storm drain system. Operation of the proposed project would primarily be a closed system and therefore not substantially degrade or affect water quality.

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?

See item i) below.

h) Place within a 100-year flood area structures to impede or redirect flood flows?

See item i) below.

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?

Less Than Significant Impact. While portions of the proposed project alignment lie within a 100-year flood zone and an area susceptible to inundation from failure of upstream dams, the proposed project would serve existing LADWP customers, operate underground, and would not involve sizeable aboveground structures. As such, the construction and operation of the proposed project would not increase the risk from flood or inundation over what is currently experienced by existing local residents and employees nor would it involve the placement of housing within these areas or cause the redirection of flood flows, and neither people or nor structures would be exposed to an increased significant risk of loss, injury or death involving flooding. In the event of pipeline failure during operation, safety valves throughout the water distribution system may be shut off (as deemed necessary by LADWP) in response to a loss of pressure and to isolate the break. The volume of potable water released in such an event would be limited to the amount of water contained in the section of pipeline between the shut-off valves, which is not expected to yield enough water to pose a threat to life or property.

j) Inundation by seiche, tsunami, or mudflow?

No Impact. The proposed project is not subject to seiche- or tsunami-related inundation as it is not located within the range of a seiche hazard zone or tsunami hazard zone. In addition, the proposed project is not located in an area subject to mudflows. Therefore, the potential impact on or to the

proposed project, during either construction or operation, from inundation by seiche, tsunami, or mudflow is very low, if not non- existent.

IX. LAND USE AND PLANNING

Would the project:

a) Physically divide an established community?

No Impact. Construction impacts from the proposed project would be short-term and within public streets and rights-of-way. Though the construction would transverse through established communities, the proposed project would operate underground or in public rights-of-way (e.g., sidewalk); therefore, it would not physically divide the community.

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?

No Impact. Construction and operation of the proposed project would occur within public rights-of-way, with the majority of structures located underground, and would thus would have no effect on any land uses on or near the project site, or conflict with any General Plan designations or zoning ordinances. Some appurtenant structures, such as air vacuum valves and cabinets, would be located aboveground, within the sidewalk portion of the public right-of-way. These structures are common elements of the urban environment and would not conflict with any applicable land use plan, policy or regulation.

A portion of the eastern section of the alignment (from First Street/North Kenmore Avenue to Beverly Boulevard/Hoover Street) lies within public streets the Vermont/Western Transit Oriented District Specific Plan area[20]. However, the provisions of this plan pertain to residential and commercial development (i.e., use and design restrictions for buildings or structures requiring a building permit), and do not apply to public works projects (such as the proposed project), since such projects do not affect the and use patterns or qualities of the area. A portion of the eastern section of the alignment lies within public streets within the Windsor Square Historic Preservation Overlay Zone. All project components within the Historic Preservation Overlay Zone will be installed below ground.

[20] City of Los Angeles Department of City Planning. *Vermont/Western Transit Oriented District Specific Plan, Ordinance No. 173,749.* Effective March 1, 2001.

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. The land uses in the immediate vicinity of the project site are residential, commercial, industrial, and public facility uses. No known habitat or natural communities conservation plans exist for the project area. Therefore, the construction and operation of the proposed project would not conflict with, or otherwise adversely impact, any habitat or natural communities conservation plans.

X. MINERAL RESOURCES

Would the project:

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?

Less Than Significant Impact. Development of the proposed project would involve the use of construction materials, which include negligible quantities of non-renewable resources. Construction of the proposed project would follow industry standards and would not use non-renewable resources in a wasteful or inefficient manner. No mineral resources that are of value to the region or residents of the state have been identified in the vicinity of the proposed project. The proposed project is not located within a Significant Mineral Aggregate Resources Area as designated by the State of California Department of Conservation. Therefore, the proposed project would not result in the loss of availability of any mineral resource that would be of value to the region and the residents of the state. Once constructed, operation of the proposed project would not affect known mineral resources. Impacts to known mineral resources (i.e., petroleum fuels) from construction are expected to be less than significant.

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?

No Impact. The proposed project is not located in an area designated as containing locally important mineral resources. Therefore, the construction and operation of the proposed project would not result in the loss of availability of any mineral resource.

XI. NOISE

a) Exposure of persons to or generation of noise levels in excess of applicable standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact with Mitigation Incorporated. Noise from construction activities includes noise from heavy equipment, pavement removal, trenching and tunneling, pipe-laying, and pavement restoration.

Construction of the proposed project is expected to last 16 months beginning in June 2006. While construction would generally occur between 9:00 a.m. and 3:30 p.m. Monday through Saturday per Los Angeles City Department of Transportation requirements, in all circumstances, construction activities would be limited to the hours of 7:00 a.m. and 6:00 p.m. Monday through Friday, and between 8:00 a.m. and 6:00 p.m. on Saturdays.

Section 112.05 of the Los Angeles Building Code specifies the maximum noise level of powered equipment or powered hand tools. Any powered equipment or powered hand tool that produces a maximum noise level exceeding 75 dBA at a distance of 50 feet shall be prohibited between the hours of 7:00 a.m. and 10:00 p.m. in any residential zone of the City or within 500 feet of a residential zone. However, the above noise limitation shall not apply where compliance is technically infeasible. Technically infeasible shall mean that the above noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of equipment.

Typically, individual pieces of heavy construction equipment produce maximum noise levels on the order of 80 to 90 dBA at 50 feet. Table 7 shows noise level at 0 feet for each of the equipment types anticipated for project construction. Construction of the proposed project would occur at locations less than 50 feet from residences and noise levels would be anticipated to exceed the 75 dBA standard at 50 feet even with the use of all feasible noise attenuation measures. As the project will comply with Section 112.05 to the extent feasible, and would employ feasible noise reduction measures, as described in section (c) below, impacts would be less than significant with mitigation incorporated.

Table XI-1
Typical Noise Levels by Equipment Type

Construction Phase and Equipment	Typical High Noise Level (at 0 feet)
Site Preparation, Excavation, and Shoring	
Excavators	92
Rubber-Tired Loaders	86
Backhoe	95
Pipe Installation and Backfilling	
Compactor	82
Crane	88
Other Equipment	-
Worker Vehicles	-
Street Restoration	
Paver	93
Source: Draft LA CEQA Thresholds Guide, 1998.	

The proposed project is subject to Section 41.40, which limits the hours of construction between 7:00 a.m. and 6:00 p.m. Monday through Friday, and between 8:00 a.m. and 6:00 p.m. on Saturdays.

The operation of dewatering pumps will result in the generation of noise. The pump may run 24 hours depending on how much water there is in the trench. Operation of the dewatering pumps has the potential to the potential to generate noise in excess of the City of Los Angeles threshold of 65 CNEL. Consequently, this impact is considered a potentially short-term adverse impact. Implementation of the following mitigation measure will reduce this impact to a less-than-significant level.

N-1 Acoustically design dewatering pump enclosures. LADWP shall ensure that all dewatering pumps be enclosed within appropriate structures so as to meet or exceed the City's general plan standard of 65 CNEL.

Operational noise would be limited to the above ground cabinets, which would be required to demonstrate compliance with the Los Angeles Municipal Code during plan check and engineering review. As a result, the project would comply with all applicable regulations, and impacts would be less than significant.

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. Construction activities associated with the proposed project may result in some minor amount of ground vibration. Vibration from construction activity is typically below the threshold of perception when the activity is more than about 50 feet from receiver.

Additionally, vibration from these activities will be short-term and will end when construction is completed. Because construction activity will not involve high impact activities, such as pile driving, and is short-term in nature, this impact is considered less-than-significant.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

No Impact. Operation of the proposed project would include underground water flow and above ground cabinets. All such structures are required to comply with the Los Angeles Municipal Code during plan check and engineering review. Therefore, operation of the proposed project would not result in an increase in ambient noise, and no impact would occur.

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact with Mitigation Incorporated. Noise impacts associated with project construction will result in temporary or periodic increases in daytime noise levels. Existing daytime noise levels in the vicinity of the project site range from 56 to 71 dBA Leq (average hourly noise level). The City has not adopted specific noise level criteria for construction noise impacts. However, it is typically accepted that short term daytime construction noise levels less than 85 dBA Leq at a residential receptor are acceptable. As a worst case example, peak construction activity is expected to increase the daytime noise level by 30 dBA at the nearest receptor. Occasional daytime construction noise levels may be approximately 86 to 89 dBA Leq at this receptor. This is considered a potentially short-term adverse impact.

Implementation of the following mitigation measures are expected to reduce daytime construction noise to acceptable levels. For example, constructing a solid wall that blocks the line of sight, with a surface weight of at least 4 pounds per square foot, between construction noise sources and noise sensitive land uses will provide a 5 dBA reduction, reducing the noise level below 85 dBA Leq. Therefore, with implementation of Mitigation Measures N-2 through N-4, this impact would be less than significant.

N-2 Employ Noise-Reducing Construction Practices. Construction shall be restricted to the hours of 7:00 a.m. to 6:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturday. Where feasible, the construction contractor shall employ noise-reducing construction practices such that noise from construction does not exceed 75 dBA Leq at noise sensitive uses between the hours of 7:00 a.m. to 6:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturday.

Measures that shall be used to limit noise include:

- Construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels;
- The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices; and
- Locating equipment as far a practical from noise sensitive uses,
- Using equipment that is quieter than standard equipment,
- Selecting haul routes that affect the fewest number of people,
- Using noise-reducing enclosures around noise-generating equipment,
- Constructing barriers between noise sources and noise sensitive land uses or taking advantage of existing barrier features (terrain, structures) to block sound transmission. Barriers break the line of sight between the noise source and the receptor and should have a surface weight of at

least 4 pounds per square foot with no gaps between the ground and the top of the wall.

N-3 Prepare a Noise Control Plan. The construction contractor shall prepare a detailed noise control plan based on the construction methods proposed. This plan will identify specific measures that will be taken to ensure compliance with the letter and intent of City noise ordinances to the extent reasonably feasible. The noise control plan shall be reviewed and approved by LADWP before any noise-generating construction activity begins.

N-4 Disseminate essential information to residences and implement a complaint/response tracking program. Prior to construction, the construction contractor shall notify residences within 500 feet of the construction areas, in writing, of the construction schedule and anticipated noise levels. The construction contractor will designate a noise disturbance coordinator who will be responsible for responding to complaints regarding construction noise. The coordinator will determine the cause of the complaint and will ensure that reasonable measures are implemented to correct the problem. A contact telephone number for the noise disturbance coordinator will be conspicuously posted construction site fences and will be included in the written notification of the construction schedule sent nearby residents.

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?

No Impact. The proposed project is not located within an airport land use plan or within 2 miles of an airport.

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?

No Impact. The proposed project is not located within the vicinity of a private airstrip.

XII. POPULATION AND HOUSING

Would the project:

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)?

No Impact. Construction and operation of the proposed project would serve to increase the reliability of water supply in the LADWP services area, and would not increase the available supply of potable water in the region. As such, the project would not induce substantial population growth in the area,

either directly or indirectly. No growth-inducing impacts are anticipated to result from the proposed project, as the project would accommodate existing LADWP water customers.

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact. The construction and operation of the proposed project would occur within public streets and rights-of-way, and staging areas would be located at existing LADWP facilities or vacant/undeveloped lots. No housing is to be removed as part of the proposed project. Therefore, construction and operation of the proposed project would not have any impacts on the number or availability of existing housing in the area and would not necessitate the construction of replacement housing elsewhere.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. As mentioned in item b) above, the construction and operation of the proposed project would not displace any housing, and therefore would not result in the displacement of people.

XIII. PUBLIC SERVICES

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

i) Fire protection?

Less Than Significant Impact. Construction of the proposed project could have the potential to temporarily reduce access for emergency vehicles near the project site. However, all construction activities would be carried out in accordance with all applicable LADOT and LAFD emergency access standards, and access would be maintained during construction. Operation of the proposed project is passive and would not require additional fire protection. No substantial adverse physical impacts would occur to fire services.

ii) Police protection?

Less Than Significant Impact. Construction of the proposed project could have the potential to temporarily reduce access for emergency vehicles near the project site. However, all construction activities would be carried out in accordance with all applicable LADOT and LAPD emergency access standards, and access will be maintained during construction. Operation of the proposed project is passive and would not

require additional police protection. No substantial adverse physical impacts would occur to police services.

iii) Schools?

Less Than Significant Impact. No population increase in the project area would result from the construction and operation of the proposed project. However, construction of the proposed project could have the potential to temporarily reduce access to schools adjacent to the proposed project alignment while construction is occurring adjacent to schools. Access will be maintained during construction activities through compliance with all requirements specified by LADOT and by using best management practices for construction traffic, as described in Section XV, Transportation/Traffic, (a); therefore, no substantial adverse physical impact to local schools would occur; operation of the proposed project is underground and would not impact schools.

iv) Parks?

No Impact. The construction and operation of the proposed project would not generate any additional population that would increase demand for neighborhood or regional parks or other recreational facilities. Accordingly, no substantial adverse physical impact to parks would result.

v) Other public facilities?

Less Than Significant Impact. Construction activities would be short-term in nature and would only affect a small portion of the alignment during any single period, and hospital access would be maintained at all times. Operation is not expected to result in physical impacts associated with any other public facilities in the area or in the City of Los Angeles as a whole. No substantial adverse physical impacts to public facilities (e.g., hospitals) would occur.

XIV. RECREATION

Would the project:

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

No 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. Therefore, no impacts to existing neighborhood and regional parks or other recreational centers would occur.

b) Include recreational facilities or require construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. The proposed project is a pipeline and appurtenant structures necessary for the operation and maintenance of the pipeline. Construction and operation of the proposed project would not include recreational facilities or require construction or expansion of recreational facilities, which might have an adverse physical effect on the environment.

XV. TRANSPORTATION/TRAFFIC

Would the project:

a) Cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume-to-capacity ratio on roads, or congestion at intersections)?

Less Than Significant Impact. Construction of the proposed alignment would result in temporarily increased traffic from construction activities and reduced roadway capacities during brief periods of time. In general, the pipeline would be installed in sections no longer than 2000 feet within a work area. After the installation of each section of pipe, the open trench would be backfilled. Once construction activities are complete in a work area, the street would be paved and normal traffic patterns would be restored. This would occur for several weeks to several months at each of the twenty-two defined work areas. Approximately 12 full road closures are anticipated out of twenty-two work areas during project construction (see Appendix F for a description of proposed construction activities within each work area). Jacking would be used at the intersections of First Street/Vermont Avenue, First Street/Beverly Boulevard/Commonwealth Avenue, near First Street/Manhattan Avenue, First Street/Madison and at Beverly Boulevard/Hoover Street). The increased traffic and reduced roadway capacities would be temporary and traffic conditions would go back to normal after the sixteen month construction period. Project impacts to traffic load and street capacity would be potentially significant during various construction phases for short periods of time at some or all of the work areas, but LADWP would prepare worksite traffic control and detour plans for each area which would avoid potentially significant impacts. Prior to construction, LADWP would submit the plans for approval to LADOT to ensure that traffic impacts, including impacts to public transportation routes, are kept to a minimum. LADWP would comply with all requirements specified by LADOT and would implement the following best management practices for construction traffic, as necessary:

- Construction areas would be separated by concrete barriers or other LADOT-approved barriers;

- During construction, temporary traffic control devices, signs, and flaggers would be provided to minimize traffic congestion. At nighttime, all barricades would be provided with flashing, steady burn warnings, and all delineators would have white reflective bands. All barricading and traffic controls would conform to the latest editions of the Greenbook and the Work Area Traffic Control Handbook (WATCH);
- Safe and adequate pedestrian and vehicular access would be provided to police and fire stations, schools, day care facilities, fire hydrants, hospitals, commercial and industrial establishments. The access to these facilities would be continuous and unobstructed;
- The construction of the project would be coordinates with the MTW to relocate bus stops, if needed;
- Temporary traffic lanes would have a minimum of 10 feet in width to provide safe access to cars, buses, trucks, and trailers;
- At busy intersections, project construction would take place below-grade using pipe-jacking techniques, without disturbing the street surface, to avoid traffic impacts;
- The construction of the project would create some minor temporary impacts to the existing street parking facilities. However, LADWP would coordinate the construction activities with the LADOT to minimize any potential impacts to the existing street parking facilities;
- Excavations would be fenced or barricaded with K-rails to provide protection against anyone falling into the excavation; and
- LADWP would assign a full-time construction inspector to the project to monitor the construction activities and to ensure that all traffic requirements specified by LADOT are implemented.

Impacts to traffic congestion and street capacity would be less than significant with the adherence to the above construction practices.

b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?

No Impact. The Congestion Management Program (CMP) was created statewide as a result of Proposition 111 and has been implemented locally by MTA. The CMP for Los Angeles County requires that the traffic impact of individual development projects of potentially regional significance be analyzed. Level-of-service impact thresholds are not intended to be applied to construction activities.[21] The project traffic impacts would occur during construction activities only. Therefore, the project is not forecast to exceed

[21] Katz, Okitsu & Associates. Memo: First Street Trunk Line Project, Los Angeles, California Traffic Impact Assessment. July, 2005.

the significant impact thresholds defined by the county congestion management agency. The operation of the proposed project, once constructed, would be passive and mostly underground. Appurtenant structures are at or just above ground, however, these structures are common urban elements and do not impact traffic. As such, no traffic impacts would occur upon project completion.

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?

No Impact. The proposed project would install a pipeline and associated appurtenant structures. The construction and operation of the proposed project would not generate air traffic nor would it affect air traffic activity.[22]

d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. Construction of the proposed project would temporarily alter existing street/traffic patterns along the alignment. These temporary changes to traffic patterns and levels of service during the construction phase would be temporary and limited to the immediate area in which construction activities are occurring. All changes to traffic patterns (i.e. lane closures) and detour plans would be coordinated with LADOT and MTA to minimize impacts to motorists, public transportation patrons, and pedestrians and would be in compliance with applicable city, county, state, and federal codes.[23] No design features (i.e. sharp curves or dangerous intersections) or incompatible uses are proposed as part of this project. Accordingly, operation of the proposed project would have no impact on traffic patterns.

e) Result in inadequate emergency access?

Less Than Significant Impact. The proposed project would not hinder emergency access in the area, except for short term periods during construction. As discussed above, all construction activities would be carried out in accordance with LADOT, LAFD, and LAPD emergency access requirements, and access would be maintained during construction activities. Impacts to emergency access would be less than significant.

f) Result in inadequate parking capacity?

Less Than Significant Impact. During construction, curbside parking would be reduced in various work areas to accommodate the construction "foot print". Lane closures resulting from construction activities in the existing street rights-of-way would result in short term loss of parking capacity along affected sections of streets along the alignment. The reduction in parking

[22] Ibid.
[23] Ibid.

supply would be temporary and would not affect long term parking capacity along the alignment or the surrounding vicinity.[24] The project, upon completion, would not result in a reduction of parking in the project vicinity as no additional vehicle trips would be generated and the project would not require parking as part of its operation. Accordingly, no permanent impacts to parking capacity would occur.

g) Would the project conflict with adopted policies supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

No Impact. The proposed project would not conflict with adopted policies supporting alternative transportation. Construction activities would be coordinated with LADOT and MTA in order to minimize impacts to alternative transportation facilities (i.e. bus stops, bike lanes). Access to public transportation and bike lanes would be maintained throughout construction, as required by LADOT and MTA. Accordingly, no impacts to alternative transportation would occur.

XVI. UTILITIES AND SERVICE SYSTEMS

Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

No Impact. The proposed project would not result in changes to facilities or operations at existing wastewater treatment facilities. Consequently, no modification to a wastewater treatment facility's current wastewater discharges would occur; hence, no impact to wastewater treatment requirements of the applicable Regional Water Quality Control Board would occur.

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?

No Impact. It is not anticipated that the construction and operation of the proposed project would generate wastewater, and would therefore not require the construction of new water or wastewater treatment facilities or expansion of existing facilities.

c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. Stormwater drainage facilities are provided throughout the project area. Construction of the proposed project is not expected to increase stormwater runoff in the project area, since the project would be placed beneath previously developed surfaces. Although

[24] Katz, Okitsu & Associates. Memo: First Street Trunk Line Project, Los Angeles, California Traffic Impact Assessment. July, 2005.

construction dewatering may be required during construction, the activity would be temporary in nature and the amount of dewatering discharge would not exceed the capacity of the existing stormwater drainage facilities, nor require new or expanded facilities of this type. The proposed project, once operational, would primarily be a closed system, except at the Silver Lake regulator station which would automatically discharge water as necessary to regulate pipeline pressures into an underground stormwater drain. The amount of discharge water necessary for pressure regulation would be within the capacity of the existing system, and therefore would not require the construction of new or the expansion of existing stormwater drainage facilities. The construction and operation of the proposed project is not anticipated to require, or indirectly result in, the construction of new stormwater drainage facilities or the expansion of existing facilities.

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

No Impact. The proposed project is a water supply infrastructure project that would convey water as part of the existing LADWP water supply infrastructure and serve the area from existing entitlements and resources. No new or expanded entitlements would be needed during construction or operation of the proposed project. No water supply impacts would result.

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?

No Impact. Construction and operation of the proposed project would not generate wastewater or otherwise require wastewater treatment capacity. No impacts to wastewater treatment capacity would occur.

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

No Impact. Excavation and construction debris would be recycled or transported to the nearest landfill site and disposed of appropriately. The construction contractor will work with the City of Los Angeles' Recycling Coordinator to ensure that source reduction techniques and recycling measures are incorporated into project construction. The amount of debris generated during project construction is not expected to significantly impact landfill capacities. Operation of the proposed project would not generate any solid waste. No significant impacts to landfill capacity are anticipated.

g) Comply with federal, state, and local statutes and regulations related to solid waste?

No Impact. As mentioned above in item f) above, construction debris would be recycled or disposed of according to local and regional standards, and operation of the project would not generate any solid waste. As such, no significant impacts related to compliance with solid waste statutes and regulations are expected.

MANDATORY FINDINGS OF SIGNIFICANCE

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

No. The analysis conducted in this Initial Study results in a determination that the proposed project, either individually or cumulatively, would not have a significant effect on the local environment with the incorporation of the proposed mitigation measures. The majority of the proposed project would be placed underground, under existing street and other public rights-of way (e.g., sidewalks) in an area that is currently developed with residential, commercial, public facility, and open space, and the site is devoid of fish, significant wildlife, and/or plant populations. Accordingly, the proposed project would not have the potential to substantially degrade the environment in this regard. It is hereby found that the proposed project involves no potential for any impacts, either individually or cumulatively, on wildlife resources and cultural resources.

Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?

No. The short-term and long-term goals of the proposed project are the same: to provide greater LADWP water system flexibility, greater LADWP water system reliability and to provide an emergency back up supply and supplemental source to LADWP water system reservoirs. As such, short-term goals would not be achieved at the disadvantage of long-term goals, as identified.

Does the project have environmental effects that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

No. The proposed project would have no impacts on biological resources, land use and planning, population and housing, and recreation; therefore, it would not result in cumulative impacts to these environmental factors. The proposed project would have less than significant impacts to aesthetics, hazardous materials and hazardous waste, hydrology and water quality, mineral resources, public services, transportation/traffic, and utilities and service systems. The potential impacts of the project on these environmental factors would be expected to be minimal, and in conjunction with other local and/or DWP projects, would not be expected to contribute cumulatively considerable impacts. The project would have less than significant impacts with mitigation incorporated on air quality, cultural resources, geology and soils, and noise. Because the proposed project would implement mitigation measures during construction for impacts to these environmental factors and operation of the proposed project would not result in any environmental

impacts, these impacts in conjunction with other local and/or LADWP projects would not contribute to cumulatively considerable impacts.

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

No. As discussed in the respective issue areas, the proposed project would have no adverse effects on human beings.A beneficial effect would be provided by providing a more reliable and flexible water supply for existing LADWP water service customers. Therefore, the proposed project would not be anticipated to have a direct or indirect substantial adverse effect on human beings.

SECTION 4.0

SUMMARY OF MITIGATION MEASURES

AIR QUALITY

AQ –1: During pipe installation, aqueous diesel fuel shall be used in all off-road and on-road diesel equipment.

CULTURAL RESOURCES

CR-1: Archaeological spot check monitoring shall be conducted during construction in areas with the greatest potential for archaeological resources. These areas include the former Bimin Baths, Bimini Slough, and street railway locales.

CR-2: A qualified paleontological monitor shall conduct full time monitoring of construction grading and excavation in native sediments. Monitoring shall include inspection of exposed surfaces and microscopic examination of matrix. The monitor shall have authority to divert grading away from exposed resources temporarily in order to recover the specimens.

CR-3: Should a discovery be made which meets the criteria for a fossil locality, work shall be diverted until the Paleontological Field Supervisor or Principal Investigator evaluates the discovery. Localities require documentation including location and stratigraphic information. Should microfossils be discovered, the monitor shall collect matrix for processing.

CR-4: Specimens and fossils recovered shall be prepared, identified, and cataloged before donation to the accredited repository designated by the lead agency. Any resources determined not to meet significance criteria shall be offered to local schools for use in education programs.

CR-5: Monthly progress reports and final report shall be filed with the client and the lead agency. The report shall include a list of resources recovered, documentation of each locality, interpretation of resources recovered and shall include all specialist's reports.

GEOLOGY AND SOILS

GEO-1 A baseline geotechnical evaluation, including project-specific subsurface exploration and laboratory testing shall be conducted at settlement sensitive structures prior to design and construction of the proposed pipeline. This shall include the tunnel associated with the Metropolitan Transit Authority's Red Line subway where it crosses the proposed alignment. The purpose of the subsurface evaluation shall be to further assess the subsurface conditions and to provide site-specific information pertaining to the engineering characteristics of earth materials and groundwater conditions.

NOISE

N-1: Acoustically design dewatering pump enclosures. LADWP shall ensure that all dewatering pumps be enclosed within appropriate structures so as to meet or exceed the City's general plan standard of 65 CNEL.

N-2: Employ Noise-Reducing Construction Practices. Construction shall be restricted to the hours of 7:00 a.m. to 6:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturday. Where feasible, the construction contractor shall employ noise-reducing construction practices such that noise from construction does not exceed 75 dBA Leq at noise sensitive uses between the hours of 7:00 a.m. to 6:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturday.

Measures that shall be used to limit noise include:

- Construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels;
- The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices; and
- Locating equipment as far a practical from noise sensitive uses,
- Using equipment that is quieter than standard equipment,
- Selecting haul routes that affect the fewest number of people,
- Using noise-reducing enclosures around noise-generating equipment,
- Constructing barriers between noise sources and noise sensitive land uses or taking advantage of existing barrier features (terrain, structures) to block sound transmission. Barriers break the line of sight between the noise source and the receptor and should have a surface weight of at least 4 pounds per square foot with no gaps between the ground and the top of the wall.

N-3: Prepare a Noise Control Plan. The construction contractor shall prepare a detailed noise control plan based on the construction methods proposed. This plan will identify specific measures that will be taken to ensure compliance with the letter and intent of City noise ordinances to the extent reasonably feasible. The noise control plan shall be reviewed and approved by LADWP before any noise-generating construction activity begins.

N-4: Disseminate essential information to residences and implement a complaint/response tracking program. Prior to construction, the construction contractor shall notify residences within 500 feet of the construction areas, in writing, of the construction schedule and anticipated

noise levels. The construction contractor will designate a noise disturbance coordinator who will be responsible for responding to complaints regarding construction noise. The coordinator will determine the cause of the complaint and will ensure that reasonable measures are implemented to correct the problem. A contact telephone number for the noise disturbance coordinator will be conspicuously posted construction site fences and will be included in the written notification of the construction schedule sent nearby residents.

SECTION 5.0

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