

Public Draft

CITY OF BEVERLY HILLS LA BREA SUBAREA WELL AND TRANSMISSION MAIN PROJECT

Initial Study/Mitigated Negative Declaration

Prepared for
City of Beverly Hills

September 2019



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City of Beverly Hills

September 2019

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TABLE OF CONTENTS

City of Beverly Hills La Brea Subarea Well and Transmission Main Project

| | <u>Page</u> |
|--|-------------|
| Section 1, Introduction | 1 |
| 1.1 Statutory Authority and Requirements | 1 |
| 1.2 Purpose | 1 |
| Section 2, Project Description | 3 |
| 2.1 Project Background | 3 |
| 2.2 Project Objectives | 4 |
| 2.3 Project Location and Setting | 4 |
| 2.4 Description of Project Elements | 5 |
| 2.5 Project Implementation | 12 |
| 2.6 Required Approvals | 16 |
| Section 3, Initial Study Checklist | 17 |
| 3.1 Background | 17 |
| 3.2 Environmental Factors Potentially Affected | 18 |
| Section 4, Environmental Analysis | 19 |
| 4.1 Aesthetics | 21 |
| 4.2 Agricultural and Forest Resources | 25 |
| 4.3 Air Quality | 28 |
| 4.4 Biological Resources | 39 |
| 4.5 Cultural Resources | 43 |
| 4.6 Energy | 49 |
| 4.7 Geology, Soils, and Seismicity | 52 |
| 4.8 Greenhouse Gas Emissions | 64 |
| 4.9 Hazards and Hazardous Materials | 70 |
| 4.10 Hydrology and Water Quality | 77 |
| 4.11 Land Use and Land Use Planning | 83 |
| 4.12 Mineral Resources | 85 |
| 4.13 Noise | 87 |
| 4.14 Population and Housing | 99 |
| 4.15 Public Services | 101 |
| 4.16 Recreation | 104 |
| 4.17 Transportation | 105 |
| 4.18 Tribal Cultural Resources | 110 |
| 4.19 Utilities and Service Systems | 113 |
| 4.20 Wildfire | 116 |
| 4.21 Mandatory Findings of Significance | 118 |

List of Figures

| | | |
|---|--|----|
| 1 | Regional Location | 6 |
| 2 | Project Location | 7 |
| 3 | Proposed Well Site | 8 |
| 4 | Project Land Use | 9 |
| 5 | Well Rendering | 11 |
| 6 | School and Recreational Facilities in the Project Area | 73 |
| 7 | Noise Measurement Locations | 91 |

List of Tables

| | | |
|---|--|----|
| 1 | Construction Phase Duration | 12 |
| 2 | Construction Equipment Mix and No. of Workers | 13 |
| 3 | Maximum Daily Construction Emissions | 33 |
| 4 | Localized Significant Summary Construction | 35 |
| 5 | Annual Project Greenhouse Gas Emissions | 67 |
| 6 | Ambient Noise Levels | 90 |
| 7 | Construction Equipment and Maximum Noise Levels | 92 |
| 8 | Unmitigated Maximum Construction Noise Levels at Sensitive Receptors | 93 |
| 9 | Vibration Source Levels for Construction Equipment | 96 |

List of Appendices

- Appendix A: Air Quality, Greenhouse Gas and Energy Information
- Appendix B: Biological Resources Data
- Appendix C: Cultural Resources and Paleontological Resources Technical Reports,
and AB 52 Consultation Materials
- Appendix D: Noise and Vibration Information

List of Acronyms

| | |
|-----------------|--|
| AFY | acre feet per year |
| AQMP | Air Quality Management Plan |
| AR4 | Fourth Assessment Report |
| ATCM | airborne toxic control measures |
| AWWA | American Water Works Association |
| BACT | Best Available Control Technology |
| BC3 | Business Council on Climate Change |
| BHFD | Beverly Hills Fire Department |
| BHPD | Beverly Hills Police Department |
| BHUSD | Beverly Hills Unified School District |
| BMPs | best management practices |
| CAAQS | California Ambient Air Quality Standards |
| CalOSHA | California Division of Occupational Safety and Health |
| CARB | California Air Resources Board |
| CBC | California Building Code |
| CCR | California Code of Regulations |
| CDC | California Department of Conservation |
| CDFW | California Department of Fish and Wildlife |
| CEQA | California Environmental Quality Act |
| CGP | Construction General Permit |
| CGS | California Geologic Survey |
| CH ₄ | methane |
| CNDDDB | California Natural Diversity Database |
| CO ₂ | carbon dioxide |
| DDW | Division of Drinking Water |
| DTSC | California Department of Toxic Substance Control |
| EDD | Employment Development Department |
| ERP | Emergency Response Plan |
| FEMA | Federal Emergency Management Agency |
| FHWA | Federal Highway Administration |
| GHG | Greenhouse Gas |
| GWPs | global warming potential |
| HCP | Habitat Conservation Plan |
| HFCs | hydrofluorocarbons |
| I-10 | Interstate 10 |
| IPCC | United Nations Intergovernmental Panel on Climate Change |
| IS | Initial Study |
| LACM | Natural History Museum of Los Angeles County |
| LADWP | Los Angeles Department of Water and Power |

| | |
|------------------|---|
| LAFD | Los Angeles Fire Department |
| LAMC | Los Angeles Municipal Code |
| LAPD | Los Angeles Police Department |
| LAUSD | Los Angeles Unified School District |
| LOS | Level of Service |
| LST | localized significant threshold |
| MBTA | Federal Migratory Bird Treaty Act |
| MG | million gallons |
| MMT | million metric tons |
| MND | Mitigated Negative Declaration |
| MRDS | Mineral Resource Data System |
| MT | metric ton |
| MWD | Metropolitan Water District of Southern California |
| N ₂ O | nitrous oxide |
| NAAQS | National Ambient Air Quality Standards |
| NCCP | Natural Community Conservation Plan |
| NOX | primary oxides of nitrogen |
| NPDES | National Pollutant Detection and Elimination System |
| OEHHA | Environmental Health Hazard Assessment |
| PFCs | perfluorocarbons |
| PM ₁₀ | particulate matter 10 microns in diameter or less |
| PPV | peak particle velocity |
| RCP | Regional Comprehensive Plan |
| RMS | root mean square |
| RO | Reverse Osmosis |
| ROW | right-of-way |
| RPS | California Renewables Portfolio Standard |
| RTP | Regional Transportation Plan |
| SCAB | South Coast Air Basin |
| SCAG | Southern California Associate of Governments |
| SCAQMD | South Coast Air Quality Management District |
| SCS | Sustainable Communities Strategy |
| SF ₆ | sulfur hexafluoride |
| SMARA | Surface Mining and Reclamation Act |
| SOON | Surplus Off-Road Option for NO _x |
| SR | State Route |
| SRA | source receptor area |
| SWPPP | Storm Water Pollution Prevention Plan |
| SWRCB | California State Water Resources Control Board |
| TACs | toxic air contaminants |
| USDA | United States Department of Agriculture |

| | |
|-------|--|
| USEPA | United State Environmental Protection Agency |
| USGS | United States Geologic Survey |
| WEP | Water Enterprise Plan |
| WTP | Water Treatment Plant |

SECTION 1

Introduction

To expand local water supply, the City of Beverly Hills (City) proposes to develop the La Brea Subarea Well and Transmission Main Project (proposed project or project) by providing an additional net 1,700 acre-feet per year (AFY) of groundwater supply in the La Brea Subarea within the Central Groundwater Basin. The project would include the construction and operation of new pipelines, rehabilitation of an existing abandoned pipeline, and construction of a new groundwater extraction well, as described below. While there may be a need to develop additional wells in the area to accomplish the water production goal, the location and timing of any such wells is unknown at this time.

1.1 Statutory Authority and Requirements

In accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Sections 21000–21177) and the CEQA Guidelines (California Code of Regulations (CCR), Title 14, Section 15000 et seq.), the City of Beverly Hills, acting in the capacity of Lead Agency, is required to prepare an Initial Study (IS) to determine if the proposed project may have a significant effect on the environment (CEQA Guidelines Section 15063). If a Lead Agency finds that there is no substantial evidence that a project, either as proposed or as modified to include the mitigation measures identified in the IS, may cause a significant effect on the environment, the Lead Agency must prepare a Negative Declaration or Mitigated Negative Declaration (MND) for that project (Public Resources Code Section 21080(c), CEQA Guidelines Section 15070(b)).

This document is prepared in accordance with CEQA and is intended to provide an environmental analysis to support subsequent discretionary actions upon the project (CEQA Guidelines Section 15074). This analysis is not a policy document and its approval by the City neither presupposes nor mandates any actions on the part of those agencies from whom permits and other discretionary approvals would be required. This environmental documentation and supporting analysis is subject to a public review period (CEQA Guidelines Sections 15073, 15105). During this review period, comments on the document should be addressed to the City. The City will consider any comments received as part of the proposed project's environmental review and include them with the CEQA documentation for consideration by the City.

1.2 Purpose

Acting as the CEQA Lead Agency, the City has prepared this IS/MND to provide the public and responsible agencies with information about the potential environmental impacts associated with implementation of the proposed project. This IS/MND was prepared in compliance with Sections

15063 and 15070 through 15075 of the CEQA Guidelines. In accordance with Section 15070 of the CEQA Guidelines, an MND shall be prepared if the IS identifies potentially significant effects, but revisions in the project plans would avoid or mitigate the effects to a point where clearly no significant effects would occur, and there is no substantial evidence that the revised project may have a significant effect on the environment.

SECTION 2

Project Description

The proposed project would include the construction of a groundwater production well in the La Brea Subarea (that would provide approximately 1,700 AFY of new water supply), the rehabilitation of an existing (inactive) 18 and 24-inch pipelines, and the connection of the rehabilitated pipeline to a newly constructed raw water transmission main with a diameter of 16-inches (collectively, referred to herein as “proposed transmission main”). The proposed transmission main would connect the proposed production well to the existing Foothill Water Treatment Plant (WTP) for treatment and supply. The pipelines would be sized to accommodate 3,000 gallons per minute (gpm), which would be from the currently proposed well and, potentially, other wells in the area although the need for and locations of any such future wells is unknown at this time.

2.1 Project Background

The City’s water service area is approximately 6.35 square miles and includes approximately 10,600 service connections. The system includes over 170 miles of pipeline, 16 pressure zones and 10 reservoirs. The service area has a resident population of approximately 43,000 people and a daytime population of up to 250,000 people. The City’s service area supplies water from imported sources from the Metropolitan Water District of Southern California (MWD).

Historically, the City relied heavily on groundwater to meet service demands with the first wells developed in the 1880’s. The City became a charter member of MWD in 1941 at which point it started to import water from MWD, thereby increasing its reliance on imported water sources. This reliance slowed in the early 1990’s when imported water became more expensive and less reliable, at which point the City began reconsidering the use of its local groundwater resources.

Today, the City’s water supply is solely dependent on imported water. To add reliability to their water supply portfolio, the City previously constructed four production wells in the Hollywood Basin and a new Reverse Osmosis (RO) treatment plant that was first put into operation in 2003. The groundwater from the four wells is conveyed to the RO treatment plant where it is treated and discharged into the City’s distribution system under normal operation, blending with the imported water from MWD. From 2011 to 2015, the approximate average annual flows were 740 acre-feet per year (AFY) produced through local groundwater, while 10,800 AFY was imported from MWD. Therefore, local groundwater production accounted for an average of six percent of the City’s average annual water supply (City of Beverly Hills 2016). The 10 reservoirs supporting the system store a combined 43 million gallons (MG).

There are three local groundwater basins near the City: the Hollywood Basin (in which the City is located); the Santa Monica Basin to the west; and the Central Basin, which includes the La Brea Subarea. Due to the adjudication status of the basins and historical groundwater development, various areas within the City's vicinity have been investigated for the expansion of groundwater resources. The City recently completed a 2015 Water Enterprise Plan (WEP) which specifically identified the need to re-establish the well field in the La Brea Subarea to increase the local water contribution to the City (City of Beverly Hills 2015).

2.2 Project Objectives

Project objectives include the following:

- Develop approximately 1,700 AFY of new potable water supply in the La Brea Subarea of the Central Basin;
- Optimally locate a new well to provide the highest feasible level of sustainable groundwater production, and sites that can be purchased and developed in the most efficient manner and permitted by Division of Drinking Water (DDW);
- Use the existing WTP;
- Rehabilitate existing inactive 18 and 24-inch pipelines where possible to minimize construction impacts; and
- Increase operational flexibility through the development of a new water supply.

2.3 Project Location and Setting

The proposed project would be located within two jurisdictions; the City of Beverly Hills and the City of Los Angeles, as depicted on **Figure 1, Regional Location** and **Figure 2, Project Location**. The City of Beverly Hills' Foothill WTP is located on Foothill Road between Alden Drive and Third Street. The Foothill WTP is a developed water treatment plant which contains reverse osmosis (RO) facilities that would treat the raw water received from the proposed groundwater production well (Figure 2).

The proposed Well Site would be implemented on a City-owned property located at 1956 Chariton Street in the City of Los Angeles, as depicted on **Figure 3, Proposed Well Site**. The proposed Well Site has a land use designation of Low Medium II Residential and is zoned as Restricted Density Multiple Dwelling Zone (RD2-1). The site is currently developed with a residential structure; however, there are no current residents living in the structure. The site is surrounded by other residences to the north, west and south. To the east is an area designated as Neighborhood Commercial, which consists of City-owned property, and other commercial properties along La Cienega Boulevard. Implementation of the Well Site would require the installation of 15-inch storm drain pipe, which would be located within the paved right-of-way (ROW) along Chariton Street. The storm drain would dispose of water being flushed through the well during well testing and during normal operations.

While there may be a need of additional wells in the area to meet the production goal, the need for and locations of any such future wells have not been determined at this time. The La Brea Subarea is located in the northern unadjudicated portion of the Central Basin.

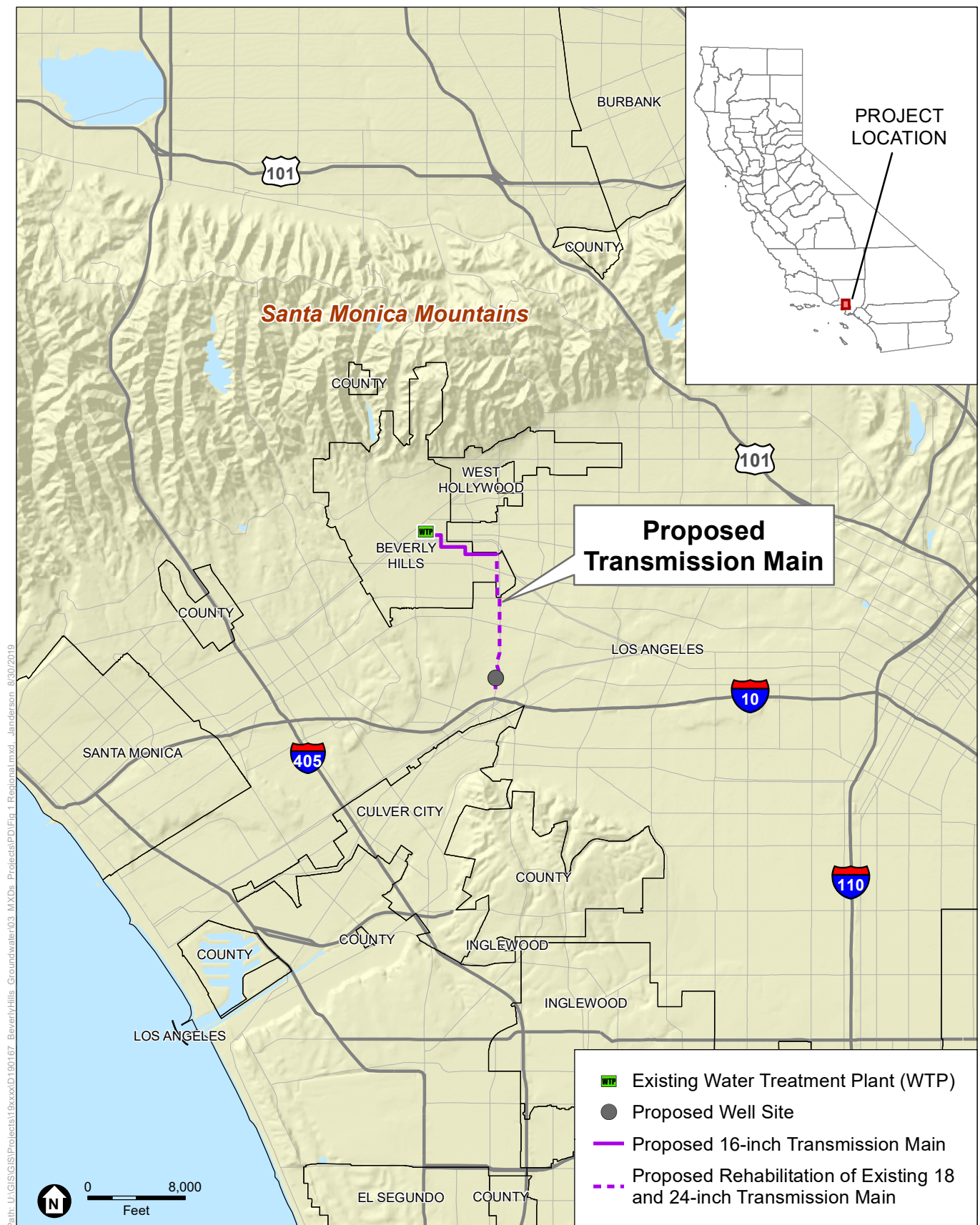
The proposed transmission main, in its entirety would be approximately four miles long. The proposed rehabilitation area of the transmission main (existing 18 and 24-inch inactive pipelines) would proceed north within La Cienega Boulevard to Olympic Boulevard and within Le Doux Road from Gregory Way to Clifton Way (see Figure 2) and to connect to the proposed 16-inch new pipeline. The length of the proposed new 16-inch transmission main would then continue westward until turning north on North Swall Drive, then west on Dayton Way. The transmission main would continue westerly along Dayton Way until turning north on North Palm Drive, then westward on 3rd street then through the City yard to connect to the utilities inlet side of the Foothill WTP (Figure 2).

Land uses in the project area vary in both the City of Los Angeles and Beverly Hills (**Figure 4, Project Land Use**). In the City of Los Angeles, the existing surrounding land uses include community commercial, general commercial, and neighborhood office commercial, where the transmission main alignment would be located along La Cienega Boulevard leading to the Well Site. Other existing land uses in the overall project area located in the City of Los Angeles include: public facilities, low density residential, medium density residential, open space, and industrial. The portion of the transmission main in the City of Beverly Hills is surrounded by single residential, multi-family residential, commercial, and public schools (Figure 4) (City of Beverly Hills 2019; City of Los Angeles 2019).

Zoning in the City of Los Angeles where the proposed transmission main would be located are as follows: Single Family Residential, Multiple Family Residential, Commercial, Manufacturing, Open Space, and Public Facilities. As the proposed transmission main travels through the City of Beverly Hills, it passes through various zones including C-5 (Commercial Zone), P-S (Public Service Zone), R-4 (Multiple Residence Zone), Parks, Reservoirs, Government (Unzoned), R-1.5X (One-Family Residential Zone), C-3 (Commercial Zone), C-3T-3 (Commercial Transition Zone), and R-1 (One-Family Residential Zone).

2.4 Description of Project Elements

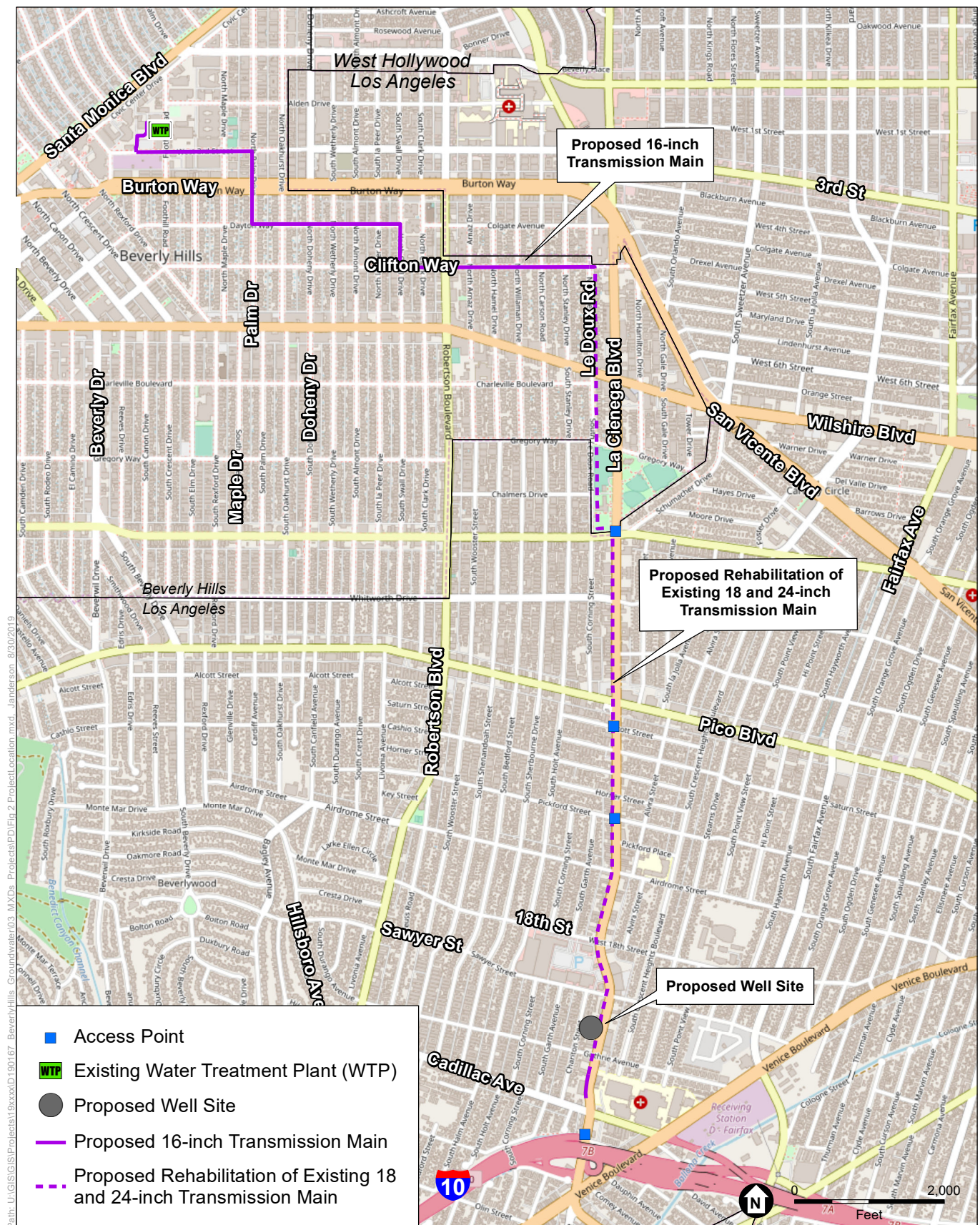
The proposed project includes: the demolition of existing structures at the proposed Well Site; the construction of one well within the La Brea Subarea; the rehabilitation of existing inactive 18 and 24-inch transmission main pipelines along La Cienega Boulevard; and the construction of a new 16-inch transmission main that would convey flows from the proposed Well Site to the City's WTP for treatment. Demolition, rehabilitation, and the construction of new facilities associated with the proposed project are described further below.

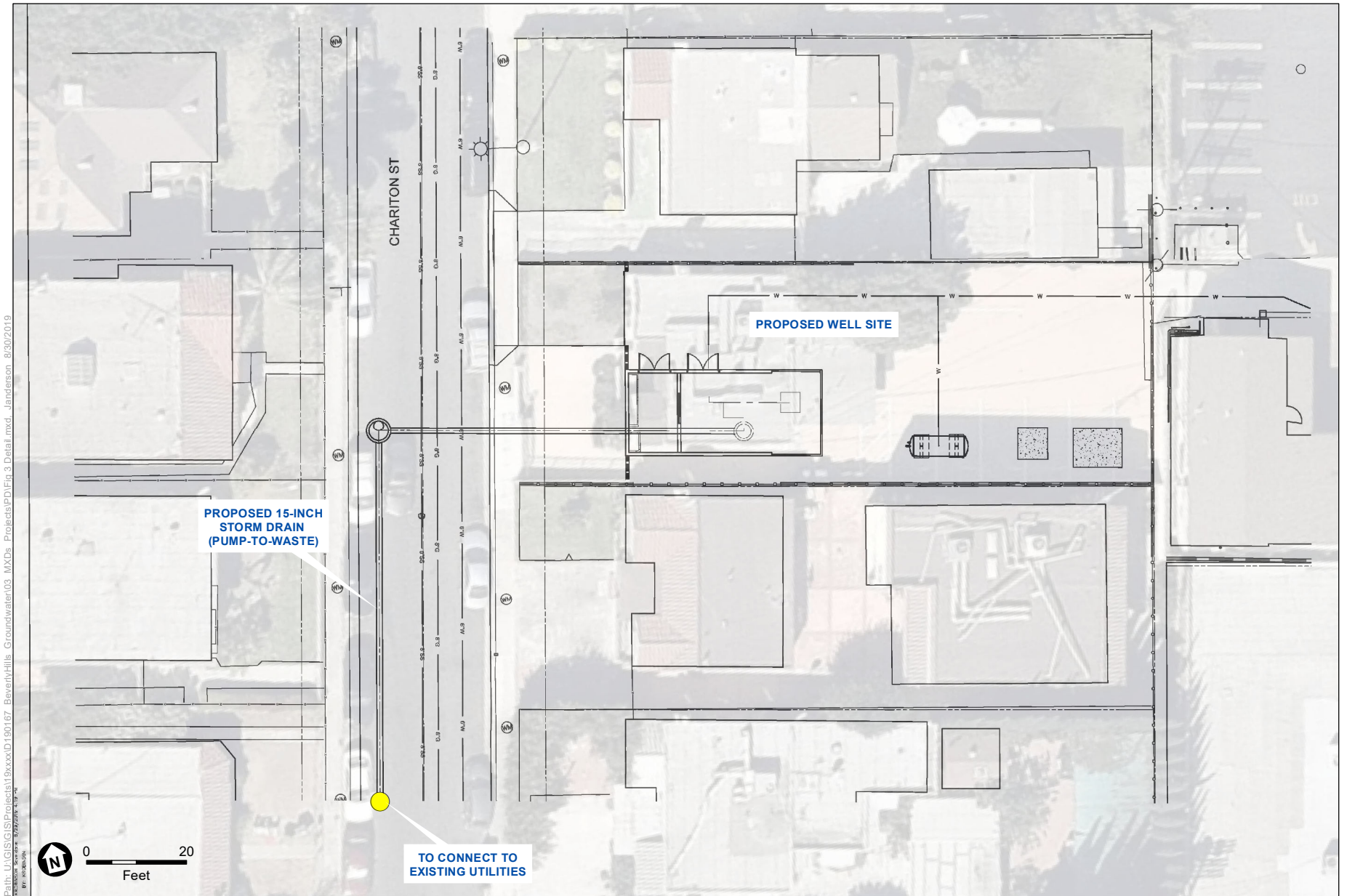


SOURCE: ESRI

La Brea Subarea Well and Transmission Main Project

Figure 1
Regional Location

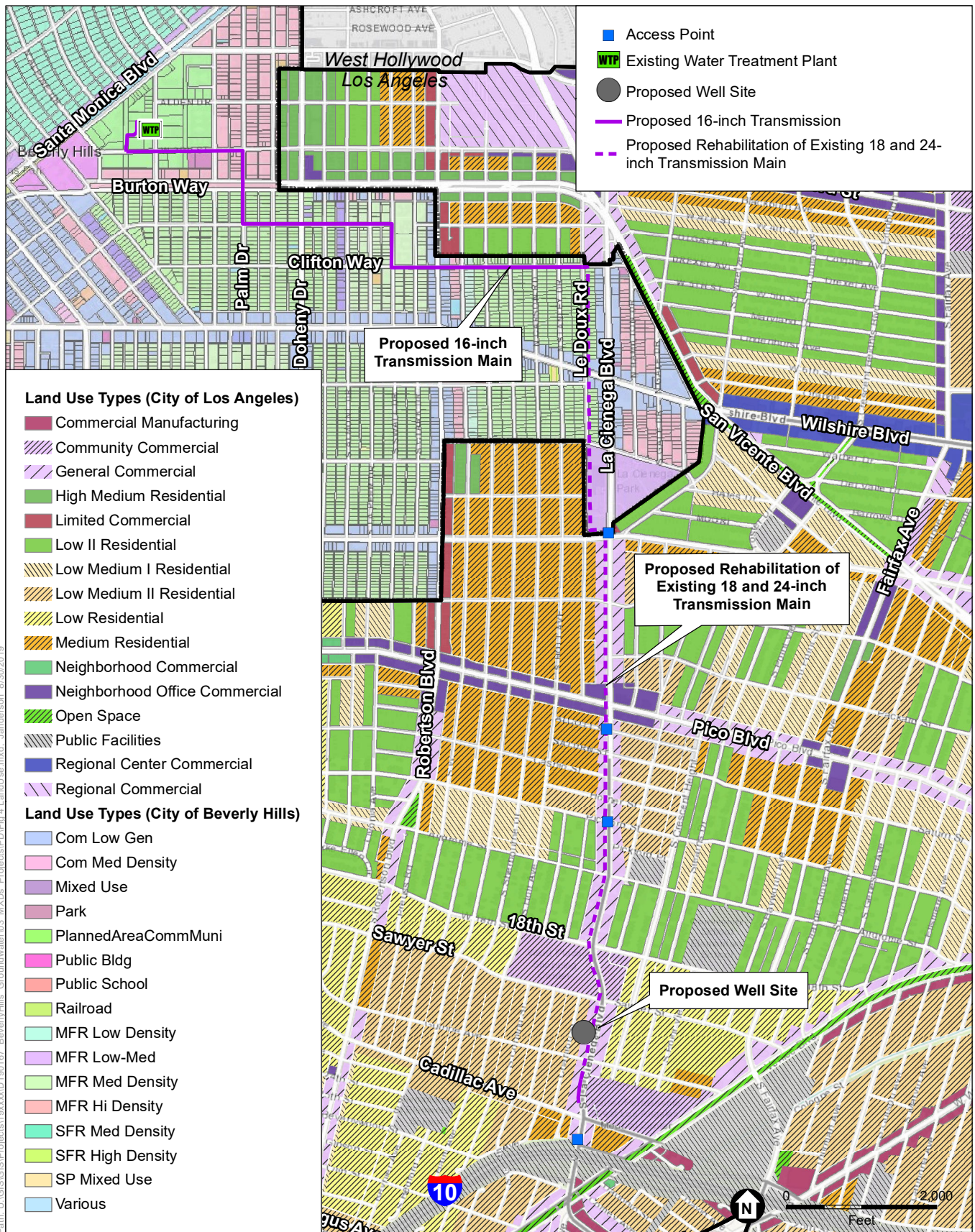




SOURCE: Mapbox; City of Beverly Hills

La Brea Subarea Well and Transmission Main Project

Figure 3
Proposed Well Site



SOURCE: ESRI; City of Beverly Hills; City of Los Angeles

La Brea Subarea Well and Transmission Main Project

Figure 4
Project Land Use

2.4.1 Production Well

The proposed Well Site would be located on 1956 Chariton Street in the City of Los Angeles (Figure 2). The area is essentially flat and the existing residential structure would be demolished before the construction of the Well. After demolition, a 15-inch storm drain (pump-to-waste pipeline) would be constructed within Chariton Street, to connect to an existing storm drain system within the local streets. When a well is turned on, typical procedure is to “pump-to-waste” for a short duration to flush the well system. This flushing procedure will discharge through the 15-inch storm drain.

The proposed well would include an approximately 150 horsepower (hp) electric pump that would be housed within a new pump building. The pump building would be approximately 700 square feet (sf) with a 3-foot by 3-foot concrete pad underneath. The well-housing would not exceed the height of adjacent structures. Total well depth would be approximately 500 feet. The predicted flow rate for the well is between 500 and 700 gpm. The well-housing would be designed to blend in with the surrounding environment. **Figure 5, Well Rendering** illustrates what the proposed well may look like.

The Well Site has two existing driveways along La Cienega Boulevard as well as access to the Well Site along Chariton Street (see Figure 2). La Cienega Boulevard is a high traffic street given that it provides access to I-10 and is also a truck route.

2.4.2 Rehabilitation and Proposed Transmission Main

The installation of new groundwater production well in the La Brea Subarea would include the rehabilitation of existing inactive 18 and 24-inch transmission pipelines and the construction of a new 16-inch transmission main alignment to convey water to the City distribution system from the proposed Well Site.

The existing, inactive 18-inch transmission main pipeline is located just north of Interstate 10 (I-10) at La Cienega Boulevard and continues north for approximately 8,000 linear feet (lf) to Olympic Boulevard at a depth of approximately 3 feet below the ground surface (bgs). The City has an easement to allow for the rehabilitation and use of this pipeline. The alignment horizontally and vertically varies at intersections; however, the majority of the pipe is located beneath the existing sidewalk on the west side of La Cienega Boulevard. The existing inactive 24-inch transmission main is located within Le Doux Road from Gregory Way north approximately 2,250 liner feet (lf) to Clifton Way, and includes the crossing of Wilshire Blvd. The alignment is located approximately 6-feet east of street centerline at a cover depth that varies between 3.5-feet and 6-feet. The existing 18 and 24-inch pipelines would be rehabilitated as part of the overall transmission main of the project, then connect to the newly constructed 16-inch transmission main pipeline. The rehabilitated and new portions of the proposed transmission main would be connected and sized appropriately for anticipated flows.



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SOURCE: Hazen & Sawyer, 2019

La Brea Subarea Well and Transmission Main Project

Figure 5
Well Rendering

The projected operational flow rate for the proposed production well is in the range of 500 to 700 gpm. An 8-inch diameter pipe would be used for the individual discharge pipeline from the production well. The transmission main would be sized to handle the flow rate of the optimal flow of approximately (2,100 gpm), to allow for use in conjunction with potential future wells in the area. Many of the streets along the transmission main alignment are single lane roads, with existing utilities such as water, sewer, gas, electric, and storm drain.

2.5 Project Implementation

Implementation of the proposed project would consist of a combination of construction activities as well as the operation and maintenance of facilities once construction and rehabilitation is complete. This section describes the characteristics associated with the construction (including rehabilitation and demolition) and operation and maintenance phases of the proposed project.

2.5.1 Construction Phase Characteristics

Construction Schedule

Project construction would take place for approximately 13 months, from Fall 2019 through Winter 2020, with several activities potentially occurring in parallel. Construction activities would occur during nighttime and weekends for the 24-hour drilling of the production requiring approximately 120 days of drilling and testing. Nighttime construction would also be required for the rehabilitation and construction of the transmission main along La Cienega Boulevard because it is within a commercial area. This nighttime construction would minimize impacts to traffic and construction delays within roadways.

The remainder of the proposed well and transmission main would involve construction typically occurring between 7:00 a.m. and 7:00 p.m., Monday through Friday except on federal holidays.

Table 1 summarizes the proposed construction activities and their estimated durations.

TABLE 1
CONSTRUCTION PHASE DURATION

| Type of Construction | Estimated Duration |
|---|--------------------|
| Wells Site Demolition and Pump-to-Waste | 2 months |
| Well Construction Monitoring | 4 months |
| Well Equipping | 7 months |
| Rehabilitation/Transmission Main Installation | 8 months |
| Total Construction Phase Duration | 13 months |

Note: Construction phasing/type may not occur concurrently.
SOURCE: Hazen 2019

Construction Activities and Construction Vehicle Trips

All construction activities associated with the proposed project would occur within the Well Site boundaries and within existing public ROWs and sidewalks. Construction equipment, vehicles, personnel, and materials staging areas would be located onsite or immediately adjacent to the site, where such areas can be accommodated. Construction traffic would utilize local streets, primarily La Cienega Boulevard. The following subsections provide descriptions of the various aspects of the proposed project's construction phase. **Table 2** summarizes equipment that are anticipated to be used during construction of the proposed project. Table 2 shows the equipment that could be used during any of the construction phases and is not indicative of the total amount that would be operated onsite at any given time.

TABLE 2
CONSTRUCTION EQUIPMENT MIX AND NO. OF WORKERS

| Construction Activity | Estimated Construction Workers | Number and Types of Construction Equipment |
|--|--------------------------------|---|
| Well Site Demolition and Pump-to-Waste line construction | 10 | hydraulic excavators, pulverizes, hammers, forklift, front loader, trench boxes, dump truck |
| Well Construction | 4 | 1 drill rig, 1 pipe trailer, 3 baker-type tanks, 1 frontend loader, 1 generator, 1 compressor, 1 gravel pump, 4 sound walls, 1 small crane, 1 water truck, 4 auxiliary materials delivery trucks; 1 pump installation rig; 3 cement trucks; 1 cement pump truck |
| Well Equipping | 4 | forklift, crane |
| Rehabilitation/Transmission Main Installation | 10 | backhoe, excavator, front end loader, trench boxes, dump truck |

SOURCE: Hazen 2019

Up to 20 workers per day would be required during the peak construction phase of the proposed project. Construction-related transportation activities associated with the proposed project will include haul truck trips, construction material truck trips and employee trips. Table 2, above, summarizes the estimated number of workers necessary for each phase.

Demolition/Site Preparation

The proposed project would demolish existing structures at the Well Site, totaling approximately 6,767 cubic yards of construction material. Generally, ground disturbance during demolition would not extend deeper than 25 feet; concrete below this depth would be left in place.

Demolition and site grading activities would require approximately 5 dumpster haul trucks per day and 20 dumpster haul trucks total. Imported soil may be required to level the site after demolition. Construction waste would be disposed of at 365 Disposal & Recycling Landfill located at 11153 Tuxford Street, Sun Valley, CA 91352.

Due to the age of the existing structures at the Well Site, hazardous materials may be encountered during removal. Hazardous materials, including asbestos-containing materials, lead-based paint, and universal wastes¹ were documented in facilities designated for demolition. Removal of these materials would be performed in accordance with federal and state regulations.

New Facilities/Rehabilitation

Production Well

The proposed project would construct a new above-grade well-house and new below-grade production well, as described previously. Construction equipment pertaining to the Well Site would be staged onsite or immediately adjacent to the site, where such areas can be accommodated. Best management practices (BMPs) would be implemented to control erosion. The proposed production well would require continuous 24-hour drilling and testing, and therefore would require temporary overnight lighting. All temporary constructing lighting would be shielded downward and away from the adjacent properties, cars driving along Chariton Street and other roadways, and the surrounding residential neighborhoods.

Well drilling would require the removal of approximately 11 cubic yards of excavated soil for the Well Site. The removal of excavated soil would require four haul truck trips per day at the Well Site. No imported soil would be required. Well installation would require 10 vendor/supply trucks and other vehicles. The total amount of trucks and vehicles required for Well Site would be approximately 84 vehicles.

Transmission Main Rehabilitation and Construction

Pipeline construction equipment will be temporarily staged in areas immediately adjacent to roadways and/or stored off site. The transmission main alignment would be installed primarily within existing roadways and ROW to the extent feasible.

Construction of the proposed transmission main would involve trenching using conventional cut and cover and jack and bore techniques for pipeline portions within the City of Beverly Hills. The transmission main would run along Le Doux Road, Clifton Way, North Swall Drive, Dayton Way, North Palm Drive, and West 3rd Street. The trenching technique would include saw cutting of the pavement where applicable, trench excavation, pipe installation, backfill operations, and resurfacing. Open trenches would be between approximately 4 feet wide and 5 feet deep with vertical cuts and trench shoring. Excavation depths would vary depending on location of existing utilities. On average, about 100-200 linear feet of pipeline would be installed per day.

No full road closures are anticipated for the proposed project. Partial road closures may be required. The City would obtain the appropriate encroachment permitting and coordinate with the City of Los Angeles in applicable areas, as needed. Partial road closures would include signage, traffic guidance, and other safety measures. Please see Section 4.17, *Transportation*, below for further details on traffic control measures. Boring methods would be used as needed to avoid full road closures. Implementation of the new 16-inch transmission main would require the

¹ Universal waste is a category of waste materials designated as "hazardous waste", but containing materials that are very common. It is defined in 40 C.F.R. 273.9, by the United States Environmental Protection Agency but states may also have corollary regulations regarding these materials.

excavation of approximately 11,018 cubic yards of soil. All excavated soil would be hauled away and trenches would be backfilled with 2-sack slurry.

Rehabilitation of the existing inactive 18 and 24-inch transmission main pipelines would be executed through the sliplining technique². The rehabilitated portion of the 18 and 24-inch existing pipelines will be sliplined with a 13.5-inch carrier pipe (it gets inserted within the 18 and 24-inch pipes). Typical practice in pipeline design is to use pipe fittings called reducers to connect pipes of different sizes. The rehabilitated 18 and 24-inch pipes will connect to the newly constructed 16-inch portion of the transmission main by using a standard ductile iron mechanical joint (18-inch by 16-inch ductile iron reducer) fittings. The design flow rate for the pipeline is 2100 gpm, but the transmission main in its entirety is sized to accommodate up to 3000 gpm. Rehabilitation would require the excavation of approximately 185 cubic yards of soil.

All impacted areas would be returned to pre-project conditions. Approximately 1,000 sf of various portions of the west sidewalk along La Cienega Boulevard would need to be reinstalled. When a new pipeline is installed, it requires the excavation of a trench through the street/roadway. After a pipeline is installed, the trench should be backfilled and the pavement surface needs to be replaced with new pavement. This is typical construction technique for all segments of a pipeline being installed within an open-trench construction area. Le Doux Road, Clifton Way, North Swall Drive, Dayton Way, North Palm Drive, and West 3rd Street would need to be repaved once the new 16-inch transmission main is installed. The total square feet to repaved area is approximately 10,000 sf.

2.5.2 Operation and Maintenance

Full operation of all components of the proposed project is estimated to commence in late 2020, and operate as needed 24 hours per day, 7 days a week. Operation of proposed facilities would only require periodic maintenance with daily staffing similar to the City's existing conditions at similar City facilities. The proposed well and transmission main would not require an increase in the number of City employees; therefore, routine operations, maintenance, and/or repair would be performed by the City's current existing staff. Since the City already owns and operates similar assets, maintenance activities would be performed in the same manner. The proposed well pump would require varying amounts of energy depending on pumping schedules. The proposed well would use a maximum of 112kW of energy when operating. Therefore, the proposed project would not significantly increase the need for energy within the project vicinity.

² The pipeline rehabilitation method sliplining uses High Density Polyethylene (HDPE) with the rolldown method, or traditional sliplining with fusible polyvinyl chloride (PVC). The sliplining method maximizes the internal diameter of the pipe, which maximizes the benefit of utilizing the existing inactive 18 and 24-inch inch transmission main.

2.6 Required Approvals

The proposed project may require approvals from the following agencies:

- City of Los Angeles, demolition permit, grading permit, construction permit within public right-of-way, utility permit;
- City of Beverly Hills, permit application, encroachment permit for work within public street or right-of-way;
- Los Angeles Regional Water Quality Control Board – Region 4, Storm Water Pollution Prevention Plans (SWPPP) and General Construction Permit;
- Division of Drinking Water, Domestic Water Supply Permit; and
- South Coast Air Quality Management District, Permit to construct.

SECTION 3

Initial Study Checklist

3.1 Background

1. **Project Title:** La Brea Subarea Well and Transmission Main Project
2. **Lead Agency Name and Address:** City of Beverly Hills
345 Foothill Road
Beverly Hills, CA 90210
3. **Contact Person and Phone Number:** Tristan Malabanan, P.E.
City of Beverly Hills, Project Manager
(310) 285-2512
4. **Project Location:** City of Beverly Hills and the City of Los Angeles (see Section 2.3, above)
5. **Project Sponsor's Name and Address:** City of Beverly Hills
Department of Public Works, Civil Engineering Division
345 Foothill Road
Beverly Hills, CA 90210
6. **General Plan Designation(s):** Various (see Section 2.3, above)
7. **Zoning:** Various (see Section 2.3, above)
8. **Description of Project:**

The project would include the construction of a groundwater production well in the La Brea Subarea, the rehabilitation of existing 18 and 24-inch pipelines, and the connection of the rehabilitated pipeline to a newly 16-inch constructed raw water transmission main. The proposed 16-inch transmission main would connect the proposed production well to the existing Foothill Water Treatment Plant (WTP) for treatment and supply.

9. Surrounding Land Uses and Setting:

Residential and Commercial Uses (See Section 2.3, above for more information)

10. Other public agencies whose approval is required:

See Section 2.6, above.

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

See Section 4.18, below.

3.2 Environmental Factors Potentially Affected

The environmental factors checked below include impacts that are “Less Than Significant with Mitigation Incorporated.” There are no environmental factors that have an impact that is identified as a “Potentially Significant Impact” because all potential significant impacts can be reduced to less than significant with the incorporation of mitigation measures.

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

DETERMINATION:

On the basis of this IS:

- ☐ 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 or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.


 Signature

Tristan Malabanan, P.E., Project Manager
 Printed Name

9/19/19
 Date

City of Beverly Hills
 For

SECTION 4

Environmental Analysis

Sections 4.1 through 4.21 analyze the potential environmental impacts associated with the Project. The environmental issue areas that are evaluated are:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology, Soils, and Seismicity
- Greenhouse Gas Emissions
- Hazards/Hazardous Materials
- Hydrology/Water Quality
- Land Use/Planning
- Mineral Resources
- Noise
- Population/Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities/Services Systems
- Wildfire
- Mandatory Findings of Significance

The environmental analysis in the following sections is patterned after the CEQA Guidelines Appendix G, Environmental Checklist (hereafter referred to as the Initial Study Checklist or IS Checklist), which was revised by the Office of Planning and Research on December 28, 2018, and used by the City in its environmental review process. The IS Checklist will identify and briefly explain the environmental effects of the project. For any effects that are determined to be potentially significant, the IS Checklist will identify and evaluate feasible measures that may be incorporated into the project to avoid or mitigate any adverse impacts.

For the evaluation of potential impacts, the questions in the IS Checklist are stated and an answer is provided according to the analysis undertaken as part of the IS. The analysis considers the long-term, direct, and indirect impacts of the development. To each question, there are four possible responses:

- **No Impact.** The development will not have any measurable environmental impact on the environment.
- **Less than Significant Impact.** The development will have the potential for impacting the environment, although this impact will be below established thresholds that are considered to be significant.
- **Less than Significant with Mitigation Incorporated.** The development will have the potential to generate impacts, which may be considered as a significant effect on the environment, although mitigation measures or changes to the development's physical or operational characteristics can reduce these impacts to levels that are less than significant.

- **Potentially Significant Impact.** The development could have impacts, which may be considered significant, and therefore additional analysis is required to identify mitigation measures that could reduce potentially significant impacts to less than significant levels.

The following is a discussion of potential project impacts as identified in the IS/Environmental Checklist. Explanations are provided for each item.

4.1 Aesthetics

| <i>Issues (and Supporting Information Sources):</i> | <i>Potentially Significant Impact</i> | <i>Less Than Significant with Mitigation Incorporated</i> | <i>Less Than Significant Impact</i> | <i>No Impact</i> |
|---|---------------------------------------|---|-------------------------------------|-------------------------------------|
| 1. AESTHETICS — Except as provided in Public Resources Code Section 21099, would the project: | | | | |
| a) Have a substantial adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Environmental Evaluation

Would the Project:

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

Less Than Significant Impact. The City of Los Angeles General Plan identifies several scenic resources within the city, including but not limited to the San Gabriel and Santa Susana Mountains to the north, the Santa Monica Mountains that extend across the middle of the city, the Palos Verdes Hills and Pacific Ocean to the south and west, and views of the Los Angeles River throughout the city (City of Los Angeles 2001). Similarly, the City of Beverly Hills identifies landscaping and various urban settings as scenic vistas with the city (City of Beverly Hills 2010). The nearest scenic vistas to the project area would be the Pacific Ocean and the Santa Monica Mountains located approximately eight miles to the west and two miles northwest of the proposed project, respectively. Furthermore, a portion of Santa Monica Boulevard (old Route 66) within the City of Beverly Hills is located immediately north of the WTP, where the water will be treated.

The project area is not officially designated as a scenic vista or scenic corridor. Short-term construction impacts would include: equipment staging; well drilling and installation; and transmission main rehabilitation and new pipeline. installation. These construction activities would occur for approximately 13 months. The presence of construction equipment within the project area could temporarily disrupt views of the distant mountains from motorists traveling along local roadways. However, the project area is heavily built-up and urban in nature. Many views of local scenic resources are already obstructed by commercial and residential buildings within the project area. Further, construction is temporary, and would not permanently effect

views of local scenic vistas. Therefore, construction impacts on aesthetics would be less than significant.

Once constructed, the transmission main would be underground and would not affect any existing views of local scenic vistas. The Well Site facilities would be located above-ground on property owned by the City of Beverly Hills. Although, implementation of proposed project would introduce built structures into the project area, the existing Well Site is currently developed. Therefore, implementation of well facilities would not appear substantially different than current land uses. Additionally, the well-housing and ancillary facilities would be designed to conform with surrounding development. Further, the proposed well facilities would not have the scale or massing to significantly obstruct views of the surrounding scenic vistas such as the Santa Monica Mountains. Therefore, the proposed project would not result in a substantial adverse effect on a scenic vista and impacts would be considered less than significant.

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

No Impact. Based on a review of the California Department of Transportation (Caltrans) List of Scenic Highways, the project area is not located along an officially Designated State Scenic Highway (Caltrans 2019). The nearest eligible state scenic highway is State Route (SR) 1 which is located approximately 8 miles southwest of the project area. Therefore, the proposed project would not substantially damage scenic resources such as trees, rock outcroppings, or historic buildings within a state scenic highway. No impacts would occur.

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

No Impact. The proposed project would be located in an urbanized area. Construction activities associated with the proposed well and transmission main would result in short-term impacts to the visual character and quality of the project area. Construction activities would require the use of construction equipment and storage of materials within the project sites. Excavated areas, stockpiled soils, and other materials generated during construction could impact the visual character of the surrounding environment. These impacts would be temporary, would occur over the 13-month construction period, and would not permanently affect the existing visual character of the surrounding area.

Once constructed, the transmission main would be underground and would not substantially degrade the visual character or the quality of public view of the site or its surroundings. The proposed well, once constructed, would place permanent above-ground structures within the project area. However, as described previously, the area in which the well would be implemented is highly developed and surrounded by commercial and residential development. The well facilities would be designed to blend in with existing and surrounding development, and will be have the appearance of a single family residence consistent with the neighboring development

(refer to Figure 5)). Specifically, the well height would not exceed the height of surrounding buildings and structures. Therefore, the visual character and quality of the Well Site would not be degraded. Nor would the project conflict with applicable zoning or other regulations governing scenic quality. Thus, no impacts would occur.

d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?

Less than Significant Impact. Existing light and glare sources within the project area include exterior lighting, glass and building materials of surrounding residential and commercial development. Additionally, the transmission main area is largely adjacent to La Cienega Boulevard, Olympic Boulevard, Le Doux Road, Clifton Way, North Swall Drive, Dayton Way, North Palm Drive, and West 3rd Street in both Beverly Hills and Los Angeles. All local roadways contain cars and streetlights that emit light and glare during the day and night.

The presence of construction equipment would not introduce new permanent lighting or glare to the project area. Nighttime lighting would be required for proposed well drilling, which would require 24-hour drilling, and portions of the proposed transmission line within commercial areas, where construction would occur at night. Nighttime construction would be temporary and limited to the area immediately surrounding the active construction areas. All lighting would be shielded and pointed toward the construction activity and away from surrounding sensitive land uses. Therefore, light and glare impacts due to project construction would be considered less than significant.

Once constructed, the proposed transmission main would be located underground and would not result in any impacts to light or glare. The aboveground portions of the proposed well facilities would not have highly reflective surfaces, and would not include large areas of glass on structures/buildings; therefore, the proposed project would have less than significant impacts regarding glare.

The proposed well facilities would be located within existing City property boundaries that currently contain lighting within the interior and exterior of existing structures. The Well Site would be located within an urban area, developed with residential, commercial, and industrial uses. Implementation of the proposed project could result in new exterior nighttime lighting for operational and security purposes within the Well Site. However, the outdoor facility lighting would be confined to the immediate area and would not be directed into adjacent areas or create light beams into the night sky. Onsite security lighting would be directed away from the adjacent residential uses. As a result, the proposed project would not introduce substantial sources of lighting to the project area and impacts regarding lighting would be less than significant.

References

- Caltrans, 2019. California Scenic Highway Mapping System: Los Angeles County. Available online at: http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/, accessed April 2019.
- City of Beverly Hills, 2010. City of Beverly Hills General Plan, Open Space Element. Available online at: http://www.beverlyhills.org/cbhfiles/storage/files/filebank/10282--5_OpenSpace%2001122010.pdf, accessed April 2019.
- City of Los Angeles, 2001. Conservation Element of the City of Los Angeles General Plan. Available online at: <https://planning.lacity.org/cwd/gnlpln/consvelt.pdf>. Accessed April 2019.
- City of Los Angeles, 2016. Mobility Plan 2035, an Element of the General Plan. Available online at: <https://planning.lacity.org/documents/policy/mobilityplnmemo.pdf>, accessed June 2019.
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4.2 Agricultural and Forest Resources

| <i>Issues (and Supporting Information Sources):</i> | <i>Potentially Significant Impact</i> | <i>Less Than Significant with Mitigation Incorporated</i> | <i>Less-Than-Significant Impact</i> | <i>No Impact</i> |
|---|---------------------------------------|---|-------------------------------------|-------------------------------------|
| 2. AGRICULTURAL AND FOREST RESOURCES — | | | | |
| In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. | | | | |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Result in the loss of forest land or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Environmental Evaluation

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?**

No Impact. The project area is currently developed and void of any agricultural uses. The California Department of Conservation (CDC) Important Farmland Map for Los Angeles County has not been mapped. There is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance within or adjacent to the project area (CDC 2019). Therefore, no impact to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would occur.

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

No Impact. A Williamson Act Contract requires private landowners to voluntarily restrict their land to agricultural land and compatible open-space uses. The project area is not located on land zoned for agricultural use (City of Beverly Hills 2008; City of Los Angeles 2019). Additionally, the project area is void of agricultural uses and does not include land enrolled in a Williamson Act Contract (CDC 2016). Therefore, implementation of the proposed project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impact would occur.

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

No Impact. The proposed project would not conflict with existing zoning of forest land or cause rezoning of forest land, timberland, or timberland zoned for Timberland Production. The proposed project does not involve any changes to current General Plan land use or zoning. Additionally, the City of Beverly Hills and City of Los Angeles zoning maps do not include zoning categories related to forest land, timberland, or timberland zoned as Timberland Production (City of Los Angeles 2001; City of Beverly Hills 2010). Therefore, the proposed project would not conflict with existing zoning for these uses, and would not result in the conversion of forest land. No impact would occur.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The project area and surrounding areas contain no forest land. Thus, implementation of the proposed project would result in no impacts related to the loss or conversion of forest land to non-forest use.

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

No Impact. Refer to responses above. The project area consists of public right-of-ways, residential and commercial development. No other changes to the existing environment would occur from implementation of the proposed project that could result in conversion of farmland to nonagricultural use or forest land to non-forest use. Thus, no impact would occur.

References

- California Department of Conservation (CDC), 2019. California Important Farmland Finder. DOC). 2017a. Farmland Mapping and Monitoring Program- Los Angeles County Important Farmland 2016. Available online at: <https://maps.conservation.ca.gov/DLRP/CIFF/>, <https://www.conservation.ca.gov/dlrp/fmmp/Pages/LosAngeles.aspx>, , accessed on April 12, 2019.
- CDC, 2016. DOC. 2017b. Los Angeles County Williamson Act FY 2015/2016. Available online at: <ftp://ftp.consrv.ca.gov/pub/dlrp/wa/>, Division of Land Resource Protection- State of California Williamson Act Contract Land. Available online at: ftp://ftp.consrv.ca.gov/pub/dlrp/wa/2016%20Statewide%20Map/WA_2016_8.5X11.pdf, , accessed on April 12, 2019.
- City of Beverly Hills, 2008. City of Beverly Hills Zoning Map. Available online at: <http://www.beverlyhills.org/cbhfiles/storage/files/64529851516564397/FinalZoningMap.pdf>
[dfhttp://www.beverlyhills.org/cbhfiles/storage/files/64529851516564397/FinalZoningMap.pdf](http://www.beverlyhills.org/cbhfiles/storage/files/64529851516564397/FinalZoningMap.pdf), accessed on April 12, 2019.
- City of Los Angeles, 2019. ZIMAS. Available online at: <http://zimas.lacity.org/>, accessed June 2019.
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4.3 Air Quality

| <i>Issues (and Supporting Information Sources):</i> | <i>Potentially Significant Impact</i> | <i>Less Than Significant with Mitigation Incorporated</i> | <i>Less-Than-Significant Impact</i> | <i>No Impact</i> |
|--|---------------------------------------|---|-------------------------------------|--------------------------|
| 3. AIR QUALITY — Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. | | | | |
| Would the project: | | | | |
| a) Conflict with or obstruct implementation of the applicable air quality plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Expose sensitive receptors to substantial pollutant concentrations? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Environmental Evaluation

Would the Project:

a) Conflict with or obstruct implementation of the applicable air quality plan?

Less than Significant Impact. The project area is located within the 6,745-square-mile South Coast Air Basin (SCAB). Air quality planning for the SCAB is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD has adopted a series of Air Quality Management Plans (AQMP) to meet the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS) for criteria air pollutants. The SCAQMD is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the Air Basin is in non-attainment of the NAAQS (e.g., ozone [O₃], and particulate matter 2.5 microns in diameter or less [PM_{2.5}]). The SCAQMD, California Air Resources Board (CARB), and United States Environmental Protection Agency (USEPA) have adopted the 2012 AQMP which incorporates scientific and technological information and planning assumptions, regarding air quality, including the Southern California Association of Governments (SCAG) 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and emission inventory methodologies for various source categories (SCAQMD 2013). The AQMP builds upon other agencies' plans to achieve federal standards for air quality in the Air Basin and incorporates a comprehensive strategy aimed at controlling pollution from all sources, including stationary sources, and on-road and off-road mobile sources. In addition, it highlights the significant amount of emission reductions needed and the urgent need to identify additional strategies, especially for mobile sources, to meet all federal criteria pollutant standards in accordance with the Clean Air Act.

The AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving the NAAQS. These strategies are developed, in part, based on regional

growth projections prepared by the SCAG. As part of its air quality planning, SCAG has prepared the Regional Comprehensive Plan (RCP) and Guide and the RTP/SCS, which provide the basis for the land use and transportation components of the AQMP and are used in the preparation of the air quality forecasts and the consistency analysis included in the AQMP. Both the RCP and AQMP are based, in part, on projections originating with county and city general plans.

The 2012 AQMP was prepared to accommodate growth, reduce the high levels of pollutants within the areas under the jurisdiction of SCAQMD, return clean air to the region, and minimize the impact on the economy. Projects that are consistent with the assumptions used in the AQMP do not interfere with attainment because the growth is included in the projections utilized in the formulation of the AQMP. Thus, projects, uses, and activities that are consistent with the applicable growth projections and control strategies used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP, even if it would individually exceed the SCAQMD's numeric indicators.

Control strategies in the 2012 AQMP with potential applicability to reducing short-term emissions from construction activities associated with the Project include strategies denoted in the AQMP as ONRD-04 and OFFRD-01, which are intended to reduce emissions from on-road and off-road heavy-duty vehicles and equipment. Descriptions of measures ONRD-04 and OFFRD-01 are provided below:

- **ONRD-04 – Accelerated Retirement of Older On-Road Heavy-Duty Vehicles:** This measure seeks to replace up to 1,000 heavy-duty vehicles per year with newer or new vehicles that at a minimum, meet the 2010 on-road heavy-duty NO_x exhaust emissions standard of 0.2 grams per brake horsepower-hour (g/bhp-hr).
- **OFFRD-01 – Extension of the Soon Provision for Construction/Industrial Equipment:** This measure continues the Surplus Off-Road Option for NO_x (SOON) provision of the statewide In-Use Off-Road Fleet Vehicle Regulation beyond 2014 through the 2023 timeframe.

The SCAQMD Governing Board adopted the 2016 AQMP on March 3, 2017 (SCAQMD 2016). CARB approved the 2016 AQMP on March 23, 2017. USEPA approval is pending, but is a necessary requirement before the 2016 AQMP can be incorporated into the State Implementation Plan. Key elements of the 2016 AQMP include implementing fair-share emissions reductions strategies at the federal, state, and local levels; establishing partnerships, funding, and incentives to accelerate deployment of zero and near-zero-emissions technologies; and taking credit from co-benefits for greenhouse gas (GHG), energy, transportation and other planning efforts. The strategies included in the 2016 AQMP are intended to demonstrate attainment of the NAAQS for the federal O₃ and PM_{2.5} standards. The 2016 AQMP also incorporates growth projections from the SCAG 2016 RTP/SCS. Until such time as the 2016 AQMP is approved by the USEPA, the 2012 AQMP remains the applicable AQMP for federal air quality planning purposes. However, the 2016 AQMP is used in the analyses in this section, since it has been adopted by both SCAQMD and CARB. The 2016 AQMP incorporates the above-listed 2012 AQMP control strategies, which are designated as MOB-08 and MOB-10.

Construction Emissions

Construction activities associated with the proposed project have the potential to generate temporary criteria pollutant emissions through the use of heavy-duty construction equipment, such as excavators and trenchers, and through vehicle trips generated from worker trips and haul trucks traveling to and from the proposed project area. In addition, fugitive dust emissions would result from demolition and various soil-handling activities. Mobile source emissions, primarily oxides of nitrogen (NO_x), would result from the use of construction equipment such as dozers and loaders. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of construction activity, and prevailing weather conditions. The assessment of construction air quality impacts considers each of these potential sources.

Under this criterion, the SCAQMD recommends that lead agencies demonstrate that a project would not directly obstruct implementation of an applicable air quality plan and that a project be consistent with the assumptions (typically land-use related, such as resultant employment or residential units) upon which the air quality plan are based. The project would result in an increase in short-term employment compared to existing conditions. Being relatively small in number and temporary in nature, construction jobs under the project would not conflict with the long-term employment projections upon which the AQMP is based. As discussed above, emission control strategies in the AQMP with potential applicability to short-term emissions from construction activities include strategies denoted in the 2012 AQMP as ONRD-04 and OFFRD-01 and denoted in the 2016 AQMP as MOB-8 and MOB-10 in the 2016 AQMP, which are intended to reduce emissions from on-road and off-road heavy-duty vehicles and equipment by accelerating replacement of older, emissions-prone engines with newer engines meeting more stringent emission standards. Construction contractors utilized for the project would be required to comply with State regulations that require the phase-in of less polluting construction equipment and trucks (Title 13 California Code of Regulations [CCR], Sections 2449 and 2025) and as such, the project would not conflict with implementation of these AQMP emissions reduction strategies. Additionally, the project would comply with CARB requirements to minimize short-term emissions from on-road and off-road diesel equipment. The project would also comply with SCAQMD regulations for controlling fugitive dust pursuant to SCAQMD Rule 403, which includes watering to suppress dust, covering or stabilizing haul trucks, and other fugitive dust control measures.

Compliance with these requirements is consistent with and meets or exceeds the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. Because the project would not conflict with the control strategies intended to reduce emissions from construction equipment, the project would not conflict with or obstruct implementation of the AQMP, and impacts would be less than significant.

Operation

The 2016 AQMP was prepared to accommodate growth, reduce the levels of pollutants within the areas under the jurisdiction of SCAQMD, return clean air to the region, and minimize the impact on the economy. Projects that are considered consistent with the AQMP would not interfere with attainment because this growth is included in the projections used in the formulation of the AQMP. The proposed project represents an infrastructure project that would have no effect on

long-term population and employment growth. As the project would not conflict with the growth projections in the AQMP, impacts would be less than significant.

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

Less than Significant Impact. The SCAB is currently in extreme nonattainment for ozone (federal and State standards), non-attainment for respirable particulate matter 10 microns in diameter or less (PM10) (State standards) and PM2.5 (federal and State standards). The SCAQMD's approach for assessing cumulative impacts related to operations is based on attainment of ambient air quality standards in accordance with the requirements of the federal and State Clean Air Acts. As discussed above, the SCAQMD has developed a comprehensive plan, the 2016 AQMP, which addresses the region's cumulative air quality condition.

A significant impact may occur if a project were to add a cumulatively considerable contribution of a federal or State non-attainment pollutant. Because the SCAB is currently in nonattainment for ozone, PM10 and PM2.5, related projects could cause ambient concentrations to exceed an air quality standard or contribute to an existing or projected air quality exceedance. Cumulative impacts to air quality are evaluated under two sets of thresholds for CEQA and the SCAQMD. In particular, CEQA Guidelines Sections 15064(h)(3) provides guidance in determining the significance of cumulative impacts. Specifically, Section 15064(h)(3) states in part that:

"A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program which provides specific requirements that will avoid or substantially lessen the cumulative problem (e.g., water quality control plan, air quality plan, integrated waste management plan) within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency..."

For purposes of the cumulative air quality analysis with respect to CEQA Guidelines Section 15064(h)(3), the project's incremental contribution to cumulative air quality impacts is determined based on compliance with the SCAQMD adopted 2016 AQMP. The 2016 AQMP includes demographic growth forecasts for various socioeconomic categories (e.g. population, housing, employment), developed by SCAG for their 2016 Regional Transportation Plan (RTP). As discussed under (a), above, the project would not conflict with the 2016 AQMP.

The project would contribute to local and regional air pollutant emissions during construction (short-term or temporary) and project occupancy (long-term). However, based on the following analysis, construction and operation of the project would result in less than significant impacts relative to the daily significance thresholds for criteria air pollutant emissions established by the SCAQMD for construction and operational phases (SCAQMD 2015).

Daily regional and annual construction and operational source project criteria pollutant emissions (NO_x, volatile organic compounds [VOC], PM₁₀, PM_{2.5}, sulfur oxides [SO_x], and carbon monoxide [CO]) are estimated using the CalEEMod (Version 2016.3.2) software, an emissions inventory software program recommended by the SCAQMD. The model also calculates emissions from direct and indirect sources and quantifies applicable emissions reductions achieved from emissions control strategies and mitigation measures. CalEEMod is based on outputs from OFFROAD and EMFAC, which are emissions estimation models developed by CARB and used to calculate emissions from construction activities, including on- and off-road vehicles and statewide and regional emissions inventories from all motor vehicles, including passenger cars to heavy-duty trucks, operating on highways, freeways, and local roads in California. The input values used in the CalEEMod modeling analysis were adjusted based on project specific information. Assumptions and modeling output are included in **Appendix A**.

Construction Emissions

Construction activities associated with the project would result in emissions of CO, VOCs, NO_x, SO_x, PM₁₀, and PM_{2.5}. Construction related emissions are expected from the trenching, paving, pump house construction, and construction worker commutes. Construction is expected to commence in October 2019 and would last through December 2020, as described previously in *Section 2.5.1 Construction Phase Characteristics*. The construction schedule utilized in the Air Quality Impact Analysis represents a “worst-case” scenario. It is assumed that construction for the well would occur concurrently with work for the transmission main line. If project construction commences later than the anticipated start date, air quality impacts would be less than those analyzed herein, because a more energy-efficient and cleaner burning construction equipment fleet mix would be expected in the future, pursuant to State regulations that require construction equipment fleet operators to phase-in less polluting heavy-duty equipment. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per CEQA guidelines. Site specific construction fleet may vary due to specific project needs at the time of construction. The analysis utilized construction fleet information and a construction schedule provided by Hazen. A detailed summary of construction equipment assumptions by phase is provided in Table 2 above in *Section 2.5.1 Construction Phase Characteristics*.

The estimated maximum daily construction emissions are summarized in **Table 3** below. Transmission main installation and well construction may occur simultaneously so the maximum daily emissions is the sum of the overlapping phases. Emissions from the project construction would not exceed any criteria pollutant thresholds established by the SCAQMD. Therefore, impacts would be considered less than significant.

TABLE 3
MAXIMUM DAILY CONSTRUCTION EMISSIONS

| Year | Emissions (pounds per day) | | | | | |
|--|----------------------------|-----------------|-----------|-----------------|----------|----------|
| | VOC | NO _x | CO | SO _x | PM10 | PM2.5 |
| Overlapping Phases | | | | | | |
| Well Site Demolition and Pump-to-Waste - 2019 and Rehabilitation/Transmission Main Installation - 2019 | 4 | 33 | 30 | < 1 | 3 | 2 |
| Well Construction Monitoring - 2019 and Rehabilitation/Transmission Main Installation - 2019 | 6 | 63 | 50 | < 1 | 4 | 3 |
| Well Construction Monitoring - 2020 and Rehabilitation/Transmission Main Installation - 2020 | 6 | 58 | 49 | < 1 | 3 | 3 |
| Well Equipping - 2020 and Rehabilitation/Transmission Main Installation - 2020 | 2 | 20 | 15 | <1 | 1 | 1 |
| Maximum Daily Regional Emissions | 6 | 63 | 50 | < 1 | 4 | 3 |
| SCAQMD Regional Threshold | 75 | 100 | 550 | 150 | 150 | 55 |
| Threshold Exceeded? | No | No | No | No | No | No |

SOURCE: ESA 2019.

Operational Emissions

During operation of the project, there would only be periodic maintenance for the Well and proposed transmission main. The proposed facilities would not require an increase in the number of employees compared to the existing facilities; therefore, routine operations, maintenance, and/or repair would be performed by the City's current existing staff. Additional fuel and emissions for servicing the proposed facilities would be minimal. Therefore, impacts would be considered less than significant.

By applying SCAQMD's cumulative air quality impact methodology, implementation of the project would not result in an addition of criteria pollutants such that cumulative impacts would occur, in conjunction with related projects in the region. In addition, construction of the project is not expected to result in a cumulatively considerable net increase of any criteria pollutant for which the SCAQMD is in non-attainment (ozone, PM10, PM2.5). Therefore, impacts would be considered less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. The localized effects from the on-site portion of the emissions are evaluated at nearby sensitive receptor locations potentially impacted by the Proposed Action according to the SCAQMD's Localized Significance Threshold Methodology (June 2003, revised July 2008), which relies on on-site mass emission rate screening tables and project-specific dispersion modeling typically for sites greater than five acres, as appropriate (SCAQMD 2008). The localized significance thresholds are applicable to NO_x, CO, PM10, and PM2.5. For NO_x

and CO, the thresholds are based on the ambient air quality standards. For PM10 and PM2.5, the thresholds are based on requirements in SCAQMD Rule 403 (Fugitive Dust) for construction and Rule 1303 (New Source Review Requirements) for operations. The SCAQMD has established screening criteria that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance thresholds and therefore not cause or contribute to an exceedance of the applicable ambient air quality standards without project-specific dispersion modeling. The screening criteria depend on: (1) the area in which the project is located, (2) the size of the project area, and (3) the distance between the project area and the nearest sensitive receptor (e.g., residences, schools, hospitals). The screening criteria were utilized in this assessment. For the project, the appropriate Source Receptor Area (SRA) for the localized significant threshold (LST) is the Northwest Los Angeles County Coastal monitoring station (SRA 2). Since the total acreage disturbed is less than five acres per day, SCAQMD's screening look-up tables were used to determine localized significance thresholds. The nearest sensitive receptors to the Well are the residential uses located adjacent to the well. Sensitive receptors would also be located adjacent to the pipeline alignment along La Cienega Boulevard, Le Doux Road, Clifton Way, South Clark Drive, North Swall Drive, Dayton Way, North Elm Street, and Palm Drive as described in *Section 2.3 Project Location and Setting*, and Figure 2. Receptors adjacent to the pipeline alignment may be exposed to localized emissions on short-term and temporary basis. On average, about 100-200 linear feet of pipeline would be installed per day; therefore, any one specific sensitive receptor adjacent to the pipeline alignment would only be exposed to localized emissions for a few days.

SCAQMD's Methodology clearly states that "off-site mobile emissions from the project should not be included in the emissions compared to LSTs." Therefore, for purposes of the LST analysis only emissions included in the CalEEMod "on-site" emissions outputs were considered. The significance thresholds determined conservatively assume that the site is 1 acre and 25 meters away from the nearest sensitive receptor.

Localized Construction Emissions

Table 4 identifies the localized impacts at the nearest receptor location in the vicinity of the project area. The localized emissions during construction activity would not exceed any of the SCAQMD's localized significance thresholds. Therefore, impacts would be considered less than significant.

TABLE 4
LOCALIZED SIGNIFICANT SUMMARY CONSTRUCTION

| On-Site Grading Emissions | Emissions (pounds per day) | | | |
|--|----------------------------|-----------|------------|------------|
| | NO _x | CO | PM10 | PM2.5 |
| Overlapping Phases | | | | |
| Well Site Demolition and Pump to Waste - 2019 and Rehabilitation/Transmission Main Installation - 2019 | 30 | 29 | 2.0 | 1.9 |
| Well Construction Monitoring - 2019 and Rehabilitation/Transmission Main Installation - 2019 | 60 | 48 | 3.1 | 2.9 |
| Well Construction Monitoring - 2020 and Rehabilitation/Transmission Main Installation - 2020 | 54 | 48 | 2.7 | 2.5 |
| Well Equipping - 2020 and Rehabilitation/Transmission Main Installation - 2020 | 17 | 14 | 1.0 | 0.9 |
| Maximum Daily Localized Emissions | 60 | 48 | 3.1 | 2.9 |
| SCAQMD Localized Threshold | 103 | 562 | 4 | 3 |
| Threshold Exceeded? | No | No | No | No |

SOURCE: ESA 2019.

Operational Emissions

According to SCAQMD LST methodology, LSTs would apply to the operational phase of a proposed project, if the project includes stationary sources, or attracts mobile sources that may queue and idle at the site (e.g., warehouse or transfer facilities). The proposed transmission main and well are not expected to be a source of air emissions. Therefore, due to the lack of stationary source emissions, no long-term localized significance threshold analysis is needed.

CO “Hot Spot” Analysis

According to SCAQMD ambient air quality monitoring data, existing CO concentrations within the project area (Source Receptor Area 2, Northwest Coastal Los Angeles County) for 2016, 2017, and 2018 were approximately 2.2, 2.0, 1.6 parts per million (ppm), respectively, for the maximum 1-hour average and 1.1, 1.2, 1.3 ppm, respectively, for the maximum 8-hour average (SCAQMD 2016b, 2017, 2018). These measured values are substantially below the most stringent ambient air quality standard of 20 ppm for the 1-hour average and 9.0 ppm for the 8-hour average.

A CO hotspot is an area of localized CO pollution that is caused by severe vehicle congestion on major roadways, typically near intersections. Projects may worsen air quality if they increase the percentage of vehicles in cold start modes by two percent or more; significantly increase traffic volumes (by five percent or more) over existing volumes; or worsen traffic flow, defined for signalized intersections as increasing average delay at intersections operating at Level of Service (LOS) E or F or causing an intersection that would operate at LOS D or better without the proposed project, to operate at LOS E or F. While construction-related traffic on the local roadways would occur during construction, the net increase of construction worker vehicle trips to the existing daily traffic volumes on the local roadways would be relatively small (no more

than 20 construction workers at a time) and would not result in CO hotspots. Additionally, the construction-related vehicle trips would only occur in the short-term and intermittently along the approximately 4-mile transmission main alignment and Well Site.

Construction of the project may include lane closures to accommodate the placement of the transmission pipeline within the public street right-of-way. Lane closures for the project would not increase the actual traffic volume on the public street right-of-way but may result in traffic congestion over a greater time duration due to the unavailability of one or more travel lanes and vehicles requiring additional time to travel through the congested area. Lane closures for the project would result in a reduction of physical space available to vehicles. Thus, while a lane closure could result in traffic congestion over a greater duration, there would be a fewer number of vehicles physically occupying a specific area (i.e., within a congested intersection or on a roadway segment) due to the unavailability of one or more travel lanes. The net result with respect to CO hotspots would be that while traffic congestion over a greater time duration may cause CO concentration levels to be incrementally increased over a similarly greater time duration, the reduced number of vehicles physically occupying a specific area (i.e., within a congested intersection or a roadway segment) would act to counterbalance potential increases in CO hotspots concentrations by reducing the number of vehicles emitting CO within an area. With typical atmospheric dispersion of CO emissions, and given that existing CO concentrations are substantially below the ambient air quality standards, lane closures associated with construction of the project would not cause a substantial increase in CO concentrations such that the project would cause CO hotspots in excess of the 1-hour or 8-hour ambient air quality standard.

During operation, only minimal emissions would be generated from vehicle trips by worker staff for periodic inspection and maintenance purposes. The project would not produce the volume of traffic required to generate a CO hotspot. Therefore, impacts would be considered less than significant.

Toxic Air Contaminants

Concentrations of toxic air contaminants (TACs) are also used as indicators of ambient air quality conditions. A TAC is defined as an air pollutant that may cause or contribute to an increase in mortality or in serious illness, or that may pose a hazard to human health. TACs are usually present in minute quantities in the ambient air; however, their high toxicity or health risk may pose a threat to public health even at low concentrations.

Construction

Intermittent construction activities associated with the proposed project would result in short-term emissions of diesel particulate matter, which the State has identified as a TAC. During construction, the exhaust of off-road heavy-duty diesel equipment would emit diesel particulate matter during general construction activities, such as demolition, site preparation, and well/transmission main construction.

Diesel particulate matter poses a carcinogenic health risk that is generally measured using an exposure period of 30 years for sensitive residential receptors, according to the California Environmental Protection Agency, Office of Environmental Health Hazard Assessment

(OEHHA) *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments* (OEHHA Guidance), which was updated in 2015 with new exposure parameters including age sensitivity factors (OEHHA 2015). Sensitive receptors would be located adjacent to the well and along the pipeline alignment; however, localized diesel particulate matter emissions (strongly correlated with PM_{2.5} emissions) would be minimal and would be below localized thresholds as presented in Table 4. Although the localized analysis does not directly measure health risk impacts, it does provide data that can be used to evaluate the potential to cause health risk impacts. The low level of PM_{2.5} emissions coupled with the short-term duration of construction activity and the relatively small-scale of the proposed project would result in overall low level of diesel particulate matter concentrations in the project area. Furthermore, compliance with the CARB airborne toxic control measures (ATCM) anti-idling measure, which limits idling to no more than five minutes at any location for diesel-fueled commercial vehicles, would further minimize diesel particulate matter emissions in the project area. The proposed project would utilize a construction contractor(s) that complies with required and applicable BACT and the In-Use Off-Road Diesel Vehicle Regulation. Thus, it is expected that sensitive receptors would be exposed to emissions below thresholds and construction TAC impacts would be less than significant.

Operations

The proposed project would introduce new on-site stationary equipment, such as pumps and generators, and the Well Site. However, the equipment would not generate TAC emissions into the outdoor environment. Therefore, the proposed project would not expose surrounding sensitive receptors to TAC emissions. Impacts would be considered less than significant.

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

Less than Significant Impact. As shown in Table 3, the project would not exceed any criteria pollutant thresholds for which the SCAQMD is in attainment (CO, SOX). Therefore, impacts would be considered less than significant.

Odors

Potential sources that may emit odors during construction activities include construction equipment exhaust, the application of asphalt, and the use of architectural coatings and solvents. According to the SCAQMD CEQA Air Quality Handbook, construction equipment is not a typical source of odors. SCAQMD Rule 1113 limits the amount of VOCs from architectural coatings and solvents. Further, construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of construction. Through adherence with mandatory compliance with SCAQMD Rules, no construction activities or materials are proposed which would create objectionable odors. Given that the well is located in a single-family residential neighborhood, it is assumed that this would be the worst case scenario as the residence (sensitive receptor) is adjacent to the project.

According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass

molding facilities. While the project would connect to the existing Foothill Water Treatment Plant, the transmission main and well are not anticipated to generate fugitive or evaporative odor emissions. Therefore, the proposed project would not generate odors affecting a substantial number of people and impacts would be considered less than significant.

References

- Office of Health Hazard Assessment (OEHHA), 2015. *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*. Available at: <http://oehha.ca.gov/air/crn/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0>. Accessed July 2019.
- South Coast Air Quality Management District (SCAQMD), 2008. Final Localized Significance Threshold Methodology. Available at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>. Accessed July 2019.
- SCAQMD, 2013. *Final 2012 Air Quality Management Plan*. Available at: <https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2012-air-quality-management-plan>. Accessed July 2019.
- SCAQMD, 2015. *Air Quality Significance Thresholds*. Available at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>. Accessed July 2019.
- SCAQMD, 2016a. *Final 2016 Air Quality Management Plan*. Available: <https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp>. Accessed July 2019.
- SCAQMD, 2016b, 2017, 2018. Historical Data by Year (2016, 2017, and 2018). Available: <http://www.aqmd.gov/home/air-quality/historical-air-quality-data/historical-data-by-year>. Accessed September 2019.
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4.4 Biological Resources

| <i>Issues (and Supporting Information Sources):</i> | <i>Potentially Significant Impact</i> | <i>Less Than Significant with Mitigation Incorporated</i> | <i>Less Than Significant Impact</i> | <i>No Impact</i> |
|--|---------------------------------------|---|-------------------------------------|-------------------------------------|
| 4. 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Environmental Evaluation

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 project area is located in a highly urbanized area of the cities of Los Angeles and Beverly Hills, and is currently developed with commercial and residential buildings and associated parking lots. The proposed transmission main would run along major roads and residential streets. The project area with a 500-foot buffer does not include suitable habitat for candidate, sensitive, or special-status species. Due to high levels of human activity and the density of development in the project area, there is no potential for sufficient natural habitat to support candidate, sensitive, or special status species within the project area. As such, the proposed project would not have a substantial adverse effect on candidate, sensitive, or special status species, and no impact would occur in this regard.

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

No Impact. As discussed under in Question 4.4(a), the project area is currently developed with urban uses. No riparian habitat or designated sensitive natural communities exist on the project sites or in the surrounding area. The proposed Well Site supports ornamental landscaping, including mature trees along streets, hedges, and low shrubs around residential and commercial buildings. The Well Site and areas along the proposed transmission main do not include any vegetation that constitutes a plant community. As such, the proposed project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community, and no impact would occur in this regard.

- c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

No Impact. As discussed under Question 4.4(a), the project area is currently developed and located within an urbanized area. The project area is not known to contain any federally protected wetlands as defined by Section 404 of the Clean Water Act or state wetlands as defined by the State Water Resources Control Board, and no proposed project facilities would occur within or state of federal wetlands. As such, the project would not have a substantial adverse effect on state or federally protected wetlands, and no impact would occur.

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

Less than Significant Impact with Mitigation Incorporated. The project area is currently developed and located in a highly urbanized area of the cities of Beverly Hills and Los Angeles. No wildlife corridors or native wildlife nursery sites are known to occur on the Well Site, transmission main alignment, or in the surrounding areas. Further, due to the urbanized nature of the project area, the potential for native resident or migratory wildlife species movement through the project area is negligible.

Nonetheless, the proposed Well Site does include ornamental trees and manmade structures that could support raptor and/or songbird nests. As discussed under Question 4.4(b), mature trees are located along La Cienega Boulevard and the other adjacent residential streets. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). Implementation of the proposed project has the potential to interfere with nesting birds during construction activities. Mitigation provided below would reduce this impact to a less than significant level.

Mitigation Measure

BIO-1: The City shall be responsible for the implementation of mitigation to reduce impacts to migratory and/or nesting bird species to below a level of significance through one of the following two ways:

1. Vegetation removal and demolition of structures shall be scheduled outside the avian nesting season which runs from February 15 to August 31 to avoid potential impacts to nesting birds; or
2. If avoidance of the avian nesting season (February 15 through August 31) is not feasible then the following shall occur:
 - a) A qualified biologist (i.e. biologist(s) familiar with local nesting bird species and their behavior) shall conduct a preconstruction nesting bird survey no more than 3 days prior to any vegetation removal or demolition of structures. The survey shall be conducted to ensure that impacts to birds, including raptors, protected by the MBTA and/or the California Fish and Game Code and bat maternity colonies are avoided. Survey areas shall include suitable avian nesting habitat.
 - b) If active nests of protected birds are identified during pre-construction surveys, an avoidance buffer area shall be determined at the discretion of the qualified biologist and demarcated for avoidance using flagging, staking, fencing, or another appropriate barrier to delineate construction avoidance until the nest is determined to no longer be active by a qualified biologist (i.e., young have fledged or no longer alive within the nest). An active nest is defined as a structure or site under construction or preparation, constructed or prepared, or being used by a bird for the purpose of incubating eggs or rearing young. Perching sites and screening vegetation are not part of the nest. Construction personnel shall be informed of the active nest and avoidance requirements. A biological monitor shall review the Project Site, at a minimum of one-week intervals, during all construction activities occurring near active nests to ensure that no inadvertent impacts to active nests occur. Pre-construction nesting bird surveys and monitoring results shall be submitted to the City of Beverly Hills Planning Division via email or memorandum upon completion of the pre-construction surveys and/or construction monitoring to document compliance with applicable state and federal laws pertaining to the protection of native birds.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less than Significant Impact. The proposed Well Site contains mature street trees located on private property within the project area. Therefore, the project would be subject to the provisions of the City of Los Angeles Municipal Code pertaining to the removal and replacement of street trees and trees on privately owned property. It is a violation of the City of Los Angeles Municipal Code (Sec. 5-4.1001) for people who are not official representatives or authorized agents of the City of Los Angeles to prune, remove, make attachment to, or otherwise damage a city street or park tree. However, the Well Site is owned by the City of Beverly Hills and the project is exempt from the City of Los Angeles' municipal and zoning codes and ordinances (see Section 4.11, *Land Use and Planning* of this Draft IS/MND for more information). Therefore, no conflict with

local policies or ordinances protecting biological resources would occur with implementation of the proposed Well Site and mitigation. Impacts would be less than significant.

Vegetation within the transmission main corridor is comprised of mature trees located along local streets, and the removal or modification of city trees is considered a potentially significant impact if this activity conflicts with local policies or ordinances. However, implementation of the proposed project would not remove or prune trees as part of the project, therefore, no impacts would occur.

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. There is no adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or State habitat conservation plan in place for the Well Site, the City of Los Angeles, or the City of Beverly Hills. Therefore, the project would have no impact with respect to these plans.

References

California Department of Fish and Wildlife (CDFW), 2019. California Natural Diversity Database (CNDDB) Rarefind 5. Electronic database, Sacramento, California. Available online at: <https://www.wildlife.ca.gov/Data/CNDDB/Maps-and-Data>, accessed on May 29, 2019.

4.5 Cultural Resources

| <i>Issues (and Supporting Information Sources):</i> | <i>Potentially Significant Impact</i> | <i>Less Than Significant with Mitigation Incorporated</i> | <i>Less-Than-Significant Impact</i> | <i>No Impact</i> |
|---|---------------------------------------|---|-------------------------------------|--------------------------|
| 5. CULTURAL RESOURCES — Would the project: | | | | |
| a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Disturb any human remains, including those interred outside of dedicated cemeteries? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

A Phase I Cultural Resources Assessment was prepared in support of the IS/MND (**Appendix C**). The study included archival research for archaeological, and historic resources within the study area. A records search for the proposed project was conducted on April 11, 2019 at the California Historical Resources Information System (CHRIS) South Central Coastal Information Center (SCCIC) housed at California State University, Fullerton. The records search included a review of all recorded archaeological resources and previous studies within the proposed project area and a 0.5-mile radius, and historic architectural resources within a 0.25-mile radius of the proposed project. For the purposes of this assessment, a study area beyond the project alignment was established by considering all known project components and the optimal zone of the La Brea Subarea and provided additional information on the broader context of the La Brea Subarea.

The records search results indicate that 23 cultural resources have been identified within the proposed project records search area. Three archaeological resources have been previously recorded within a 0.5-mile radius of the proposed project area and four have been previously recorded within the La Brea Subarea. Additionally, a cluster of ten prehistoric village archaeological resources, recorded in the 1950's, is located less than one-mile south and adjacent to the La Brea Subarea. Ten historic architectural resources and one California Historic Landmark (CHL) have been recorded within 0.25 miles of the proposed project and five have been previously recorded within the La Brea Subarea. The three archaeological resources previously recorded within 0.5 miles of the proposed project as well as the four previously recorded within the La Brea Subarea are prehistoric camp or village sites. Of the 11 architectural resources previously recorded within 0.25 miles of the proposed project, four are located within 100 feet of the proposed project (P-19-187281, -187282, -187283, and -189803). Three of the four resources (P-19-187281, -187282, -187283) were demolished in the early 2000s and are no longer extant. Resource P-19-189803 is a wooden utility pole constructed sometime prior to 1966. P-19-189803, is located within 30 feet of the proposed project and has been previously determined ineligible for listing National Register of Historical Resources (NRHP), but has not been previously evaluated for inclusion in the California Register of Historical Resources (CRHR). In addition, ESA conducted extensive historic map research of the project site and vicinity.

As part of this investigation, ESA contacted the Native American Heritage Commission (NAHC) requesting that a Sacred Lands File check be conducted for the proposed project and that contact information be provided for Native American groups or individuals that may have concerns about cultural resources in the study area. The response received on April 25, 2019 which indicated that Native American cultural resources are not known to be located within the proposed project area. A cultural resources field survey of the study area was conducted and focused on areas that would be potentially impacted by the proposed project and included survey and documentation of the built environment,

Environmental Evaluation

Would the Project:

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

Less Than Significant Impact. Two historic architectural resources have been identified within or immediately adjacent to the proposed project and include a wooden utility pole constructed prior to 1966 (P-19-189803) and the residence located at 1956 Chariton Street. The following paragraphs present the significance findings for both resources.

P-19-189803

Resource P-19-189803 has been determined ineligible for listing in the NRHP (Status Code 6Y), but has not been previously evaluated for inclusion in the CRHR. The NRHP evaluation for the resource did not identify that the resource was associated with a significant event (Criteria A/1), nor does it appear to be associated with a significant person or persons (Criterion B/2) (Loftus 2011). The resource is a typical example of a mid-20th century wooden utility pole does not possess qualities of design or distinctive characteristics of design and the work of a master (Criterion C/3) (Loftus 2011). Based on this evaluation, it is recommended that resource P-19-189803 is not eligible for listing in the CRHR and does not qualify as a historical resource. In addition, the resource is not listed for local significance. This resource will not be directly or indirectly impacted by the project and no additional evaluation or recommendations are warranted.

1956 Chariton Street

1956 Chariton Street is a single-family residence, and this building type was evaluated under the historical and architectural themes that follow: the Spanish Colonial Revival Architectural Style (1912-1942), Community and Operative Builders (1888-1940), and Early Single-Family Residential Development (1880-1930). This resource is recommended ineligible for listing in the CRHR, is not listed locally, and does not qualify as historical resources pursuant to CEQA. As such the proposed project would not result in significant impacts to known historical resources.

Therefore, the proposed project would result in less than significant impacts to historical resources and no mitigation measures are required.

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

Less Than Significant with Mitigation Incorporated. Review of previous investigations in the vicinity of the project, as well as review of the prehistoric context for the area provides an understanding of the potential for encountering prehistoric archaeological resources in the project site. When completing analysis of buried archaeological site sensitivity, important factors to consider include elevation, soil conditions, proximity to water, proximity to raw materials, and ethnographic and historic information. It is also necessary to evaluate the subsequent land use in determining the possibility for the preservation of prehistoric archaeological materials.

Archaeological Sensitivity

No archaeological resources were identified within or immediately adjacent to the known proposed project area. The proposed project includes the installation of a new transmission main, the rehabilitation of an existing transmission main, and the installation of Well Site. The installation and rehabilitation of the transmission mains would involve cut and cover excavations extending to depths of 5 feet within existing city streets. The installation of the Well Site would require the demolition of the residence at 1956 Chariton Street and excavations associated with the demolition would extend to depths of up to 25 feet. These ground disturbing activities have the potential to encounter unknown, sub-surface historic-period and/or prehistoric archaeological resources that could qualify as historical resource or unique archaeological resources pursuant to CEQA. Given that the rehabilitation of the transmission mains will occur within city streets with existing utilities, the likelihood of encountering intact archaeological deposits is moderate to low. However, the installation of new transmission mains may include trenching in undisturbed or moderately disturbed sediments and so the sensitivity is considered moderate to high. As described above the majority of the project alignment is within historic roads which were built in the 1940's. Historically, road construction did not require substantial excavation and historic and prehistoric sites or resources may be capped and preserved under the roads. A large number of prehistoric sites and villages are known to have been located less than a mile from the southern terminus of the known project alignment and redeposited archaeological material could be encountered during excavation, and intact materials could be encountered in trench sidewalls or if the rehabilitation requires additional excavation. During consultation for AB 52, the Gabrieleño Band of Mission Indians – Kizh Nation expressed concern about the high sensitivity of the project alignment. The demolition work at 1956 Chariton Street also has a high likelihood of encountering historic-period subsurface archaeological deposits associated with the residence such as privies or refuse deposits.

Mitigation Measures

Given the potential to encounter subsurface archaeological deposits during proposed project implementation, ESA provides the following recommended mitigation measures to reduce potential impacts to archaeological deposits that may qualify as historical resources or unique archaeological resources to less than significant.

CUL-1: Retention of Qualified Archaeologist. Prior to the start of any ground disturbing activities, a qualified archaeologist, defined as an archaeologist meeting the

Secretary of the Interior's Standards for professional archaeology (U.S. Department of the Interior 2008) shall be retained by the City of Beverly Hills to carry out all mitigation measures related to cultural resources. In addition, the City of Beverly Hills will retain a Native American monitor to work in tandem with the archaeologist in the areas and during activities with potential to encounter prehistoric archaeological resources.

CUL-2: Cultural Resources Sensitivity Training. Prior to start of any ground-disturbing activities, the qualified archaeologist shall conduct cultural resources sensitivity training for all construction personnel associated with the proposed project. Construction personnel shall be informed of the types of cultural resources that may be encountered during construction, and of the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains. The City of Beverly Hills shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.

CUL-3: Construction Monitoring. An archaeological monitor (working under the direct supervision of the qualified archaeologist) shall observe all excavation activities associated with the installation of the Well Site. For the portion of the alignment requiring installation of the new transmission mains, an archaeological monitor and Native American monitor will conduct full time monitoring of all excavations including trenching and bore pits. For the portion of the alignment which involves the rehabilitation of existing transmission mains, an archaeological monitor and Native American monitor will conduct full time monitoring on all access points along the rehabilitation alignment. Should the soils prove to be too disturbed to contain archaeological resources these spot checks can be reduced or discontinued. Conversely, if the sediments are found to contain archaeological resources, the qualified archaeologist may recommend full time monitoring for such areas along the route. The qualified archaeologist, in coordination with the City of Beverly Hills, may reduce or discontinue monitoring if it is determined that the possibility of encountering buried archaeological deposits is low based on observations of soil stratigraphy or other factors. Archaeological monitoring shall be conducted by an archaeologist familiar with the types of archaeological resources that could be encountered within the proposed project. The archaeological monitor(s) shall be empowered to halt or redirect ground-disturbing activities away from the vicinity of a discovery until the qualified archaeologist has evaluated the discovery and determined appropriate treatment (as prescribed in Mitigation Measure CUL-4). The archaeological monitor shall keep daily logs detailing the types of activities and soils observed, and any discoveries. After monitoring has been completed, the qualified archaeologist shall prepare a monitoring report that details the results of monitoring. The report shall be submitted to the City of Beverly Hills. The qualified archaeologist shall submit a copy of the final report to the SCCIC.

CUL-4: Unanticipated Discoveries. In the event of an unanticipated discovery of archaeological materials, all work shall immediately cease in the area (within approximately 100 feet) of the discovery until it can be evaluated by the qualified archaeologist. Construction shall not resume until the qualified archaeologist has conferred with the City of Beverly Hills, and the appropriate Native American representatives for prehistoric resources, on the significance of the resource.

If it is determined that the discovered archaeological resource constitutes a historical resource or a unique archaeological resource under CEQA, avoidance and preservation in place is the preferred manner of mitigation. Preservation in place may be accomplished by, but is not limited to,

avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement. In the event that preservation in place is demonstrated to be infeasible and data recovery through excavation is the only feasible mitigation available, an Archaeological Resources Treatment Plan shall be prepared and implemented by the qualified archaeologist in consultation with the City of Beverly Hills that provides for the adequate recovery of the scientifically consequential information contained in the archaeological resource and makes recommendations for curation or donation to appropriate curation facilities. The qualified archaeologist and the City of Beverly Hills shall consult with appropriate Native American representatives in determining treatment for prehistoric or Native American resources to ensure cultural values ascribed to the resource, beyond those that are scientifically important, are considered.

c) Disturb any human remains, including those interred outside of dedicated cemeteries?

Less than Significant Impact with Mitigation Incorporated. The NAHC was contacted on April 10, 2019 to request a search of the Sacred Lands File (SLF). The NAHC responded to the request in a letter dated April 25, 2019. The results of the SLF search conducted by the NAHC indicate that Native American cultural resources are not known to be located within the proposed project area.

Mitigation Measure

CUL-5: Unanticipated Discovery of Human Remains and Associated Funerary Objects. In the event human remains and/or associated funerary objects are encountered during construction of the proposed project, all activity in the vicinity of the find shall cease (within 100 feet). Human remains discoveries shall be treated in accordance with and California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98, requiring assessment of the discovery by the County Coroner, assignment of a Most Likely Descendant by the NAHC, and consultation between the Most Likely Descendant and the landowner regarding treatment of the discovery. Until the landowner has conferred with the Most Likely Descendant, the City of Beverly Hills shall ensure that the immediate vicinity where the discovery occurred is not disturbed by further activity and that further activities take into account the possibility of multiple burials.

References

- Loftus, Shannon. 2011. Primary Record for P-19-189803. On file at the South Central Coastal Information Center, California State University Fullerton.
- South Central Coastal Information Center (SCCIC). 2019a. Single Property Printout for P-19-187281. On file at the South Central Coastal Information Center, California State University, Fullerton.
- . 2019b. Single Property Printout for P-19-187282. On file at the South Central Coastal Information Center, California State University, Fullerton.
- . 2019c. Single Property Printout for P-19-187283. On file at the South Central Coastal Information Center, California State University, Fullerton.
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4.6 Energy

| <i>Issues (and Supporting Information Sources):</i> | <i>Potentially Significant Impact</i> | <i>Less Than Significant with Mitigation Incorporation</i> | <i>Less-Than-Significant Impact</i> | <i>No Impact</i> |
|---|---------------------------------------|--|-------------------------------------|--------------------------|
| 6. ENERGY — Would the project: | | | | |
| a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Environmental Evaluation

Would the Project:

- a) **Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**

Less than Significant Impact. The project would result in consumption of energy resources during project construction and operation. During construction, the project would use heavy construction equipment and require worker, vendor, and hauling trips to install the proposed Well and transmission main. These construction activities would use approximately 59,665 gallons of diesel and 1,827 gallons of gasoline (Appendix A). The project would require construction contractors and truck operators to comply with applicable state regulations governing heavy duty diesel on- and off-road equipment to minimize transportation fuel consumption. As discussed in Section 4.3, *Air Quality*, the CARB anti-idling measure, which limits idling to no more than five minutes at any location for diesel-fueled commercial vehicles, would minimize diesel fuel consumption from on-road trucks in the project area.

During operation, it is assumed that there would not be a substantial increase in mobile trips as the project would not require an increase in the number of employees compared to the existing facilities; therefore, routine operations, maintenance, and/or repair would be performed by the City's current existing staff. The Well Site is located in the City of Los Angeles and the proposed Well would have a 150 hp pump, which would consume a total of 725,089 kWh per year (Appendix A), conservatively assuming a 24-hour per day, 365 days per year operation. Under actual operating conditions, the proposed pump would require varying amounts of energy depending on pumping schedules. The proposed pump would have a maximum rating of 112 kW of electricity (instantaneous power) but would normally require less electricity under normal operating condition or approximately 83 kW assuming a load factor of 0.74, which is equivalent to powering approximately 25 homes.³ This electricity demand is within the capability of LADWP to provide without the need for substantial new energy infrastructure, and as such the

³ A load factor of 0.74 is based on the default load factor for pumps in the CalEEMod emissions model. The estimated 83 kW equivalent to power 25 homes is based on conversion of 16.4 megawatt system providing power for nearly 5,000 homes as reported from the Office of the Mayor (see <https://www.lamayor.org/mayor-garcetti-announces-completion-world%E2%80%99s-most-powerful-rooftop-solar-project>).

project would not significantly increase the need for energy within the project vicinity. Furthermore, compared to the Los Angeles Department of Water and Power (LADWP) Energy and Demand Forecast for 2020, the Project would represent 0.003 percent of the total demand (LADWP 2017; Appendix A).

Therefore, the project would not result in wasteful, inefficient, or unnecessary consumption of energy resources and would not increase the need for new energy infrastructure and impacts would be considered less than significant.

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

Less than Significant Impact. The State of California, City of Los Angeles, and City of Beverly Hills have implemented energy policies relevant to this project. The California Renewables Portfolio Standard (RPS) was established in 2002 and required retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2013. California Senate Bill 350 (Chapter 547, Statutes of 2015) is the most recent update to the state's RPS requirements. The RPS requires publicly owned utilities and retail sellers of electricity in California to procure 33 percent of their electricity sales from eligible renewable sources by 2020 and 50 percent by the end of 2030. The project would generate an increase in electricity demand for operation of the well pumps from LADWP; however, the demand would be extremely minimal with respect to LADWP supplies and no additional power generation facilities would be required. The project would not conflict with LADWP or the State's ability to achieve the RPS goals.

The City of Los Angeles' Plan, published in April 2019, sets a goal to supply 55 percent renewable energy by 2025; 80 percent by 2036; and 100 percent by 2045. For energy efficiency, the Plan would reduce building energy use per sq. ft. for all types of buildings 22 percent by 2025; 34 percent by 2035; and 44 percent by 2050 (City of Los Angeles 2019). The City of Beverly Hills' Sustainable City Plan establishes policies to maximize energy efficiency in both City operations and Citywide; maximize use of renewable energy generating systems and other energy efficiency technologies; minimize the use of nonrenewable, polluting transportation fuels; and strive for energy independence as a City (City of Beverly Hills 2009). As the project would install a well and transmission main, it would not conflict with or obstruct either city's plan for renewable energy or energy efficiency. The project would reduce the energy demand for water conveyance as it develops a local supply. Therefore, the project would have a less than significant impact to conflicting with or obstructing a state or local plan for renewable energy or energy efficiency.

References

- California Air Resources Board, 2004. Proposed Regulation Order: Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling, Appendix A, 2004. Available at <https://www.arb.ca.gov/regact/idling/isorappf.pdf>. Accessed September 2019.
- City of Beverly Hills, 2009. Sustainable City Plan. Available: <http://www.beverlyhills.org/cbhfiles/storage/files/24347783778629768/SustainableCityPlan.pdf>. Accessed July 2019.
- City of Los Angeles, 2019. L.A.'s Green New Deal: Sustainable City Plan (Plan). Available: http://plan.lamayor.org/sites/default/files/pLAn_2019_final.pdf. Accessed July 2019.
- Los Angeles Department of Water and Power (LADWP). 2017 Retail Electric Sales and Demand Forecast. September 15, 2017. Available: http://rates.ladwp.com/Admin/Uploads/Load%20Forecast/2017/10/2017%20Retails%20Sales%20Forecast_Final.pdf Accessed: July 2019.
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4.7 Geology, Soils, and Seismicity

| <i>Issues (and Supporting Information Sources):</i> | <i>Potentially Significant Impact</i> | <i>Less Than Significant with Mitigation Incorporated</i> | <i>Less-Than-Significant Impact</i> | <i>No Impact</i> |
|--|---------------------------------------|---|-------------------------------------|-------------------------------------|
| 7. GEOLOGY and Soils — Would the project: | | | | |
| a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: | | | | |
| i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| ii) Strong seismic ground shaking? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| iii) Seismic-related ground failure, including liquefaction? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| iv) Landslides? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Result in substantial soil erosion or the loss of topsoil? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

The following evaluation is based on geologic and seismic information derived from various sources listed below and compiled in this section to develop a comprehensive understanding of the potential constraints and hazards associated with geotechnical exploration activities. Information sources include geologic and soils maps and information prepared by the Department of Conservation, California Geologic Survey (CGS), the county of Los Angeles, and the cities of Los Angeles and Beverly Hills, all of which reflect the most up-to-date understanding of the regional geology and seismicity. Additionally, a paleontological resources fossil locality search was conducted by the Natural History Museum of Los Angeles County (LACM) on April 19, 2019.

American Water Works Association Standards for Proposed Pipelines

Pipelines are constructed to various industry standards. The American Water Works Association (AWWA) is a worldwide nonprofit scientific and educational association that, among its many activities, establishes recommended standards for the construction and operation of public water supply systems, including standards for pipe and water treatment facility materials and sizing, installation, and facility operations. While the AWWA's recommended standards are not enforceable code requirements, they nevertheless can dictate how pipelines for water conveyance are designed and constructed. As part of the proposed project, the construction contractors would incorporate AWWA Standards into the design and construction of the proposed transmission main.

Seismic Considerations

In California, an earthquake can cause injury or property damage by: (1) rupturing the ground surface, (2) violently shaking the ground, (3) causing the underlying ground to fail due to liquefaction, or (4) causing enough ground motion to initiate slope failures or landslides, any of which could damage or destroy structures. The checklist items in Appendix G of the CEQA Guidelines, which provide the basis for most of the significance criteria above, reflect the potential for large earthquakes to occur in California and recommend analysis of the susceptibility of the project sites to seismic hazards and the potential for the proposed program to exacerbate the effects of earthquake-induced ground motion at the project sites and surrounding areas. Impacts associated with seismic hazards would be considered significant if the potential effects of an earthquake on a particular site could not be mitigated by an engineered solution. The significance criteria do not require elimination of the potential for structural damage from seismic hazards. Rather, the criteria require an evaluation of whether significant seismic hazards could be minimized through engineering design solutions that would reduce the associated risk of loss, injury, or death.

State and local code requirements ensure buildings and other structures are designed and constructed to withstand major earthquakes, thereby reducing the risk of collapse and the associated risks to human health and safety and private property. The code requirements have been developed through years of study of earthquake response and the observed performance of structures during significant local earthquakes and others around the world. The proposed project would be required to comply with the California Building Code (CBC) and the *CGS Guidelines for Evaluating and Mitigating Seismic Hazards* (Special Publication 117A) (CGS 2008) which provides guidance for evaluating and mitigating seismic hazards as required by the Public Resources Code Section 2695(a).

Environmental Evaluation

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.)

Less than Significant Impact. The Alquist-Priolo Earthquake Fault Zoning Act, signed into law in December of 1972, requires the delineation of zones along active faults in California. The purpose of the Alquist-Priolo Act is to regulate development and prohibit construction on or near active fault traces to reduce hazards associated with fault rupture. The Alquist-Priolo Earthquake Fault Zones (AP Zones) are the regulatory zones delineated on maps that include surface traces of active faults. The maps are distributed to all affected cities, counties, and state agencies for their use in planning and controlling new or renewed construction. Local agencies must regulate most development projects within the zones, which include all land divisions and most structures for human occupancy.

Active or potentially active faults within Los Angeles County within one mile of the project area are the Newport-Inglewood, Santa Monica and Hollywood Faults (CGS 2018). The existing Foothill WTP, the proposed Well Site, and various other areas project areas where the proposed well may be implemented within an AP Zones (CGS 2018). Thus, the impacts associated with ground fault rupture resulting from a seismic event could be potentially significant.

However, the proposed well and transmission main would undergo appropriate project site-specific, design-level geotechnical evaluations prior to final design and construction as required to comply with the CBC. The geotechnical engineer, as a registered professional with the State of California, is required to comply with the CBC and local codes while applying standard engineering practice and the appropriate standard of care required for projects in the Los Angeles County area. The California Professional Engineers Act (Building and Professions Code Sections 6700-6799), and the Codes of Professional Conduct, as administered by the California Board of Professional Engineers and Land Surveyors, provides the basis for regulating and enforcing engineering practice in California. Adherence to the CBC standards would ensure the strongest structure feasible at the proposed locations, with no increased risk to human life. Impacts related to the risk of loss, injury, or death involving fault rupture would be reduced to less than significant.

ii) Strong seismic ground shaking?

Less than Significant Impact. The project area lies within a region that is seismically active. In the event of an earthquake in Southern California, some seismic ground shaking would likely be experienced in the project area sometime during the operational life of the project. As discussed, the Newport-Inglewood, Santa Monica, and Hollywood Faults are known active faults within the project area and are capable of producing earthquakes. Ground shaking could result in structural damage to the proposed well and transmission main, which in turn could affect operation of related systems. The proposed facilities are non-habitable; however, existing City employees may need to access the various facilities for maintenance or manual control purposes. Therefore, structural and mechanical failure of facilities onset by seismic ground shaking would continue to potentially threaten the safety of onsite workers. As discussed above, the City would design the proposed well and transmission main in conformance with applicable standards established by the CBC. These design standards consider proximity to potential seismic sources and the maximum

anticipated groundshaking possible. Compliance with these building safety design standards would reduce the potential to threaten the safety of existing onsite workers, and therefore, reduce the potential impacts associated with groundshaking to less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less than Significant Impact. According to the City of Los Angeles and City of Beverly Hills General Plans, and the CGS, various portions of the project area are located within liquefaction hazard zones (City of Los Angeles 1996; City of Beverly Hills 2010; CGS 2018). Thus, in the event of a large earthquake with a high acceleration of seismic shaking, the potential for liquefaction exists.

As discussed above, the proposed well and transmission main locations would undergo a geotechnical investigation and be designed to resist damage from seismic shaking. As part of the proposed project, all geotechnical recommendations provided by the project geotechnical engineer and the City would be incorporated into project designs in areas where liquefiable soils are identified. Solutions to rectify liquefaction are modern engineering approaches used throughout California and are considered standard industry practice. Methods to correct liquefiable soils include removal and replacement of problematic soils, the use of pile foundations, and drainage columns to reduce saturated conditions. The geotechnical investigation and corrective actions for potential liquefiable soils, where needed, would be based on the CGS Special Publication 117A (see the discussion above). The project structures would be subject to the CBC which controls the design and location of buildings and structures in order to safeguard the public and reduce potential impacts related to liquefaction to less than significant.

iv) Landslides?

No Impact. The implementation of the proposed project would not result in an increased exposure to landslides. Landslides are deep-seated ground failures (several tens to hundreds of feet deep) in which a large section of a slope detaches and slides downhill. The project area is located in a relatively flat area that has previously been graded and developed. There is no known history of landslides in the general area of the project. Further, the project area is not within a State-Designated Seismic Hazard Zone for Earthquake-Induced Landslides (CGS 2018). Therefore, landslides are not considered a potential hazard within the project area, and no impacts would occur.

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

Less than Significant Impact. Soil exposed by construction activities for the proposed project could be subject to erosion if exposed to heavy rain, winds, or other storm events. Further, as construction could disturb one or more acres of soil, the City would be required to comply with the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. In compliance with this permit, a Storm Water Pollution Prevention Program (SWPPP) would be prepared and implemented, which would require erosion control, sediment control, non-stormwater and waste and material management BMPs to minimize the loss of topsoil or substantial erosion.

Furthermore, implementation of the proposed project would need to comply with SCAQMD Rule 403 for dust control that would ensure the prevention and/or management of the loss of topsoils and erosion during construction. Therefore, potential loss of topsoil and substantial soil erosion during construction and operation of the proposed project would be less than significant.

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 Impact. Non-seismically-induced geologic hazards such as landslides, lateral spreading, settlement, and slope failure can be caused by unstable soils. Subsidence of the ground surface occurs under static conditions (i.e., due to consolidation settlement from overlying load or long-term water or mineral extraction), but can also be accelerated and accentuated by earthquakes. The extraction of fluid resources from subsurface sedimentary layers (i.e., water or oil) can result in subsidence from the removal of supporting layers in the geologic formation. Settlement of loose, unconsolidated soils generally occurs slowly, but can cause significant structural damage if structures are not properly designed. According to the Los Angeles and City of Beverly Hills General Plan Safety Elements, the cities have experienced limited subsidence over the years; however, it is still a potential hazard (City of Los Angeles 1996; City of Beverly Hills 2010). Therefore, impacts related to subsidence are potentially significant.

Refer to responses above for discussions of potential impacts related to liquefaction and landslides. The proposed project is located in an area defined as having the potential for liquefaction or collapse. The proposed project would involve grading activities and would construct subterranean facilities that could induce unstable soil activity. Therefore, the project could be located on unstable soils resulting in potentially significant impacts. However, the proposed project would be subject to the CBC which controls the design and location of facilities in order to safeguard the public and reduce potential unstable soils impacts. The proposed project would incorporate engineering design features to remediate potential significant impacts associated with subsidence, liquefaction, collapsible soils, and lateral spreading. Therefore, the implementation of the proposed project would result in less than significant impacts associated with unstable soils.

Furthermore, the City and its contractors would be required to adhere to all California Division of Occupational Safety and Health (CalOSHA) requirements for working within active construction sites, including specific provisions for working within trenches that would ensure the safety of all construction workers onsite. Therefore, relative to existing conditions, the proposed Project would not expose people or structures to new potential substantial adverse effects related to unstable soils. Impacts would be less than significant.

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. Expansive soils are predominantly comprised of clays, which expand in volume when water is absorbed and shrink when the soil dries. Expansion is measured by shrink-swell potential, which is the volume change in soil with a gain in moisture. Soils with a

moderate to high shrink-swell potential can cause damage to roads, buildings, and infrastructure (USDA 2019). Primary soil types in the project area contain Urban-land complexes comprised of sands and sandy loams. These soils are not typically expansive. However, the two unknown proposed well locations may be located within areas that contain expansive soils. The presence of expansive soils could decrease the structural stability of the proposed project facilities, which could result in structural or operational failure of proposed facilities and or threaten the health and safety of onsite workers. Such impacts are considered potentially significant.

However, as described above, all geotechnical recommendations provided by the project geotechnical engineer would be incorporated into the project's designs. The geotechnical investigation would provide corrective actions for potential expansive soils. The project structures would be subject to the CBC which controls the design and location of facilities in order to safeguard the public and reduce potential impacts related to expansive soils to less than significant levels.

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

No Impact. The proposed project does not include the installation of septic tanks or alternative wastewater disposal systems. During project implementation, the City or the contractor may have portable toilet facilities available onsite temporarily for use by construction workers. Once the proposed well and transmission main are constructed, such portable facilities would be removed and the wastewater properly handled and disposed in accordance with all applicable laws and regulations. There would be no impact associated with wastewater disposal.

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

Less Than Significant Impact with Mitigation Incorporated. On April 19, 2019, ESA requested a database search from the LACM for records of fossil localities in and around the project area. The purpose of the museum records search was to: (1) determine whether any previously recorded fossil localities occur in the Project Site, (2) assess the potential for disturbance of these localities during construction, and (3) evaluate the paleontological sensitivity within the Project Site and vicinity.

The records search identified three fossil localities from within 0.1 miles of the project area and an additional six localities within one mile. While exact coordinate data is not provided by the LACM, it appears that at least one of these sites may fall within the project area. These localities preserve a wide variety of terrestrial vertebrates, such as mammoth, mastodon, bison, horse, birds, and rodents, as well as plants and invertebrate fossils (McLeod 2019). While the depths of several of these localities are unstated, recorded depths range from 13 to 30 ft below ground surface (bgs) (McLeod 2019). These results are consistent with the Pleistocene terrestrial fossil record of the Los Angeles Basin.

Geologic mapping by Dibblee and Ehrenspeck (1991) indicates that the surface of the project area is covered with Holocene-aged younger alluvium, likely overlying older alluvium and marine sediments, which in turn may overlie the Monterey Formation at undetermined depths. These geologic units are discussed below.

Younger Alluvium (Qa). These sediments consist of unconsolidated silt, sand, and gravel and date from modern times to the Holocene (Dibblee and Ehrenspeck 1991). Younger alluvium is mapped as occurring across the entirety of the project area at the surface. Due to the young age of these deposits, they have low paleontological potential at the surface; however, these sediments increase in age with depth, and therefore fossil resources may be encountered in the deeper levels of this unit. While the exact depth at which the transition to older, high potential sediments [$>5,000$ years old, following the SVP's definition (SVP 2010)] is not known, fossils have been discovered across the Los Angeles Basin as shallowly as 5-10 feet below ground surface (Jefferson 1991a; 1991b). These fossils are similar to those described below from older alluvial fan deposits.

Older Alluvial Fan Deposits (Qae). Older alluvial fan deposits occur just to the east of the project area, as close as 0.1 – 0.2 miles from the project area, indicating these sediments may be present in the subsurface of the project area at relatively shallow depths. These sediments date to the Pleistocene and consist of tan to light reddish brown sand with minor gravel detritus from the highlands to the north (Dibblee and Ehrenspeck 1991). These Pleistocene sediments have a rich fossil history in the Los Angeles Basin (Hudson and Brattstrom 1977; Jefferson 1991a and b; McDonald and Jefferson 2008; Miller 1941 and 1971; Roth 1984; Scott 2010, Scott and Cox 2008; Springer et al., 2009). The most common Pleistocene terrestrial mammal fossils include the bones of mammoth, bison, deer, and small mammals, but other taxa, including horse, lion, cheetah, wolf, camel, antelope, peccary, mastodon, capybara, and giant ground sloth, have been reported (Graham and Lundelius 1994), as well as reptiles such as frogs, salamanders, and snakes (Hudson and Brattstrom 1977). In addition to illuminating the striking differences between Southern California in the Pleistocene and today, this abundant fossil record has been vital in studies of extinction (e.g. Sandom et al. 2014; Barnosky et al. 2004), ecology (e.g. Connin et al. 1998), and climate change (e.g. Roy et al. 1996).

Shallow Marine Deposits (Qom). Shallow marine deposits occur to the west of the project area, as close as 0.4 miles. indicating they may be present in the shallow subsurface of the project area. These sediments consist of light gray to light brown sand, pebbly sand gravel, and silt deposited when the area was last submerged by the ocean during the Pleistocene (Dibblee and Ehrenspeck 1991). Similar sediments have a rich fossil history in the Los Angeles Basin. In the Cheviot Hills, roughly 1.5 miles west of the southern portion of the project area, over one hundred species of marine invertebrates, primarily mollusks, were identified from Pleistocene marine sediments (Rodda 1957). Across the Los Angeles Basin shallow marine deposits assigned to the San Pedro Sand have a strong record of preserving Pleistocene marine and terrestrial fossils. The San Pedro Sand has yielded a diverse fauna of nearshore marine invertebrates such as crabs, snails, bivalves, gastropods, and echinoids (Kennedy 1975; Valentine 1989; Woodring 1957) and vertebrates such as sharks, bony fish, amphibians, reptiles, birds, whales, antelopes, mammoth, dire wolves, rodents, and bison (Barnes and McLeod 1984; Fitch 1967; Kennedy 1975; Woodring 1957).

Fernando Formation. While the Fernando Formation does not crop out in the vicinity of the project area due to truncation by the Hollywood-Santa Monica Fault Zone to the north of the project area, subsurficial cross sections developed by Diblee and Ehrenspeck (1991) indicate it is likely present in the subsurface underlying alluvial sediments within the range of the depth for the well (500 ft below ground surface [bgs]). The Fernando Formation dates to the Pliocene and consists of marine siltstone, sandstone, pebbly sandstone, and conglomerate (Morton and Miller 2006). The lower part of the Fernando Formation consists of a pebble-cobble conglomerate in a sandstone matrix that fines upwards into a coarse sandstone and then a silty sandstone (Schoellhamer et al. 1981). The upper Fernando Formation consists of coarse grained sandstone with conglomerate lenses (Schoellhamer et al. 1981). The Fernando Formation has an extensive record of preserving scientifically significant fossils, including invertebrates such as mollusks, echinoids, and bryozoans (Groves 1992; Morris 1976; Woodring 1938), fish (Huddleston and Takeuchi 2006), squid (Clarke et al. 1980), and a number of unidentified megafossils (Schoellhamer et al. 1981).

As a result of this study, the surficial sediments of the project site identified as **Younger Alluvium (Qa)** Surficial sediments; **low-to-high potential, increasing with depth**. A wide variety of Ice Age fossils have been found in older alluvial sediments across southern California, as reviewed above, including multiple specimens known from the very near vicinity of the project area (McLeod, 2019). The exact depth at which the transition from low to high potential occurs is unknown in the Project Site, depths of 5-10 feet are common in the region (Jefferson 1991a, 1991b). **Older Alluvial Fan Deposits (Qae)** – Subsurficial sediments; **high potential**. A wide variety of Ice Age fossils have been found in these sediments across the Los Angeles Basin, as reviewed above, including multiple localities known from within one mile of the project area (McLeod 2019). **Shallow Marine Deposits (Qom)** - Subsurficial sediments; **high potential**. Similar sediments have produced extensive marine fossils of both vertebrate and invertebrate animals, some as close as 1.5 miles from the project area (Rodda 1957). **Fernando Formation** – Subsurface; **high potential**. The Fernando Formation is well-known in Southern California for preserving a wide array of marine fossils such as sharks, bony fishes, and marine invertebrates.

As a result of this study, sediments present across the project area identified as younger alluvium are assigned low-to-high paleontological potential, increasing with depth. The underlying older alluvial fan and shallow marine deposits, as well as the Fernando Formation, have high paleontological potential. This classification indicates a high potential for fossils to be present in the subsurface. The following recommendations would serve to protect potentially unique paleontological resources or unique geological features, should they be encountered:

Mitigation Measures

The following mitigation measures are required to reduce impacts to unique paleontological resources or unique geological feature to a less than significant level:

GEO-1: A qualified paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards (SVP 2010) (Qualified Paleontologist) shall be retained prior to the approval of demolition or grading permits. The Qualified Paleontologist shall provide technical and compliance oversight of all work as it relates to paleontological resources,

shall attend the project kick-off meeting and Project progress meetings on a regular basis, and shall report to the project site in the event potential paleontological resources are encountered.

GEO-2: The Qualified Paleontologist shall conduct construction worker paleontological resources sensitivity training at the project kick-off meeting prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.). In the event construction crews are phased, additional training shall be conducted for new construction personnel. The training session shall focus on the recognition of the types of paleontological resources that could be encountered within the project site and the procedures to be followed if they are found. Documentation shall be retained by the Qualified Paleontologist demonstrating that the appropriate construction personnel attended the training.

GEO-3: The Qualified Paleontologist shall develop a Paleontological Resources Monitoring Plan (PRMP) that shall detail the monitoring program necessary for the project, based off of specific construction methodologies and locations. Construction activities have varying impacts on paleontological resources and may require different monitoring procedures. The PRMP shall take the specific construction plans for the project to tailor a monitoring plan to the types of construction activities and the geologic units each may encounter. In general, ground disturbance across the project site that occurs in undisturbed sediments and exceeds 5-10 feet in depth may impact high potential sediments and therefore should be monitored. This includes; excavation and site preparation at the Well Site, drilling for the production well, cut and cover and entrance and exit pits for jack and bore along the proposed transmission main and at all access points for the rehabilitation of the transmission main. Paleontological resources monitoring shall be performed by a qualified paleontological monitor (meeting the standards of the SVP 2010) under the direction of the Qualified Paleontologist. Depending on the conditions encountered, full-time monitoring can be reduced to part-time inspections or ceased entirely if determined adequate by the Qualified Paleontologist. The Qualified Paleontologist shall spot check the excavation on an intermittent basis and recommend whether the depth of required monitoring should be revised based on his/her observations. Monitors shall have the authority to temporarily halt or divert work away from exposed fossils or potential fossils. Monitors shall prepare daily logs detailing the types of activities and soils observed, and any discoveries. Any significant fossils collected during project-related excavations shall be prepared to the point of identification and curated into an accredited repository with retrievable storage. The Qualified Paleontologist shall prepare a final monitoring and mitigation report for submittal to the City in order to document the results of the monitoring effort and any discoveries.

GEO-4: Any significant fossils collected during project-related excavations shall be prepared to the point of identification and curated into an accredited repository with retrievable storage. The Qualified Paleontologist shall prepare a final monitoring and mitigation report for submittal to the City in order to document the results of the monitoring effort and any discoveries. If there are significant discoveries, fossil locality information and final disposition will be included with the final report which will be submitted to the appropriate repository and the City.

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4.8 Greenhouse Gas Emissions

| <i>Issues (and Supporting Information Sources):</i> | <i>Potentially Significant Impact</i> | <i>Less Than Significant with Mitigation Incorporated</i> | <i>Less-Than-Significant Impact</i> | <i>No Impact</i> |
|---|---------------------------------------|---|-------------------------------------|--------------------------|
| 8. GREENHOUSE GAS EMISSIONS — Would the project: | | | | |
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Environmental Evaluation

Would the Project:

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

Less than Significant Impact. Gases that trap heat in the atmosphere are called greenhouse gases (GHGs). The major concern with GHGs is that increases in their concentrations are causing global climate change. Global climate change is a change in the average weather on Earth that can be measured by wind patterns, storms, precipitation, and temperature. Although there is disagreement as to the rate of global climate change and the extent of the impacts attributable to human activities, most in the scientific community agree that there is a direct link between increased emissions of GHGs and long term global temperature increases.

The State defines GHGs as carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), perfluorocarbons (PFCs), and hydrofluorocarbons (HFCs). Because different GHGs have different global warming potentials (GWPs) and CO₂ is the most common reference gas for climate change, GHG emissions are often quantified and reported as CO₂ equivalents (CO₂e). For example, CH₄ has a GWP of 25 (over a 100-year period); therefore, one metric ton (MT) of CH₄ is equivalent to 25 MT of CO₂ equivalents (MTCO₂e). The GWP ratios are available from the United Nations Intergovernmental Panel on Climate Change (IPCC) and are published in the *Fourth Assessment Report* (AR4). By applying the GWP ratios, project-related CO₂e emissions can be tabulated in metric tons (MT) per year. Large emission sources are reported in million metric tons (MMT) of CO₂e.⁴

Some of the potential effects in California of global warming may include loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more forest fires, and more drought years (CARB 2008). Globally, climate change has the potential to impact numerous environmental resources through potential, though uncertain, impacts related to future air temperatures and precipitation patterns. The projected effects of global warming on weather and

⁴ A metric ton is 1,000 kilograms; it is equal to approximately 1.1 U.S. tons and approximately 2,204.6 pounds.

climate are likely to vary regionally, but are expected to include the following direct effects (IPCC 2001):

- Higher maximum temperatures and more hot days over nearly all land areas;
- Higher minimum temperatures, fewer cold days and frost days over nearly all land areas;
- Reduced diurnal temperature range over most land areas;
- Increase of heat index over land areas; and
- More intense precipitation events.

Also, there are many secondary effects that are projected to result from global warming, including global rise in sea level, impacts to agriculture, changes in disease vectors, and changes in habitat and biodiversity. While the possible outcomes and the feedback mechanisms involved are not fully understood and much research remains to be done, the potential for substantial environmental, social, and economic consequences over the long term may be great.

California produced 429.4 MMTCO₂e in 2016. Combustion of fossil fuel in the transportation sector was the single largest source of California's GHG emissions in 2016, accounting for approximately 41 percent of total GHG emissions in the state. This sector was followed by the industrial sector (23 percent) and the electric power sector (including both in-state and out-of-state sources) (16 percent) (CARB 2018).

Impacts of GHGs are borne globally, as opposed to localized air quality effects of criteria air pollutants and toxic air contaminants. The quantity of GHGs that it takes to ultimately result in climate change is not precisely known; however, it is clear that the quantity is enormous, and no single project would measurably contribute to a noticeable incremental change in the global average temperature, or to global, local, or micro climates. From the standpoint of CEQA, GHG impacts to global climate change are inherently cumulative.

Neither the city of Los Angeles nor city of Beverly Hills has not adopted a threshold of significance for GHG emissions that would be applicable to this project. In December 2008, the SCAQMD adopted a 10,000 MTCO₂e per year significance threshold for industrial facilities for projects in which the SCAQMD is the lead agency. Although SCAQMD has not formally adopted a significance threshold for GHG emissions generated by a proposed project for which SCAQMD is not the lead agency, or a uniform methodology for analyzing impacts related to GHG emissions on global climate change, in the absence of any industry-wide accepted standards, the SCAQMD's significance threshold of 10,000 MTCO₂e per year for projects is the most relevant air district-adopted GHG significance threshold and is used as a benchmark for the proposed project. It should be noted that the SCAQMD's significance threshold of 10,000 MTCO₂e per year for industrial projects is intended for long-term operational GHG emissions. The SCAQMD has developed guidance for the determination of the significance of GHG construction emissions that recommends that total emissions from construction be amortized over an assumed project lifetime of 30 years and added to operational emissions and then compared to the threshold (SCAQMD 2008).

The justification for the threshold is provided in SCAQMD's *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans* ("SCAQMD Interim GHG Threshold"). The SCAQMD Interim GHG Threshold identifies a screening threshold to determine whether additional analysis is required. As stated by the SCAQMD:

"...the...screening level for stationary sources is based on an emission capture rate of 90 percent for all new or modified projects...the policy objective of [SCAQMD's] recommended interim GHG significance threshold proposal is to achieve an emission capture rate of 90 percent of all new or modified stationary source projects. A GHG significance threshold based on a 90 percent emission capture rate may be more appropriate to address the long-term adverse impacts associated with global climate change because most projects will be required to implement GHG reduction measures. Further, a 90 percent emission capture rate sets the emission threshold low enough to capture a substantial fraction of future stationary source projects that will be constructed to accommodate future statewide population and economic growth, while setting the emission threshold high enough to exclude small projects that will in aggregate contribute a relatively small fraction of the cumulative statewide GHG emissions. This assertion is based on the fact that [SCAQMD] staff estimates that these GHG emissions would account for slightly less than one percent of future 2050 statewide GHG emissions target (85 [MMTCO₂e per year]). In addition, these small projects may be subject to future applicable GHG control regulations that would further reduce their overall future contribution to the statewide GHG inventory. Finally, these small sources are already subject to [Best Available Control Technology (BACT)] for criteria pollutants and are more likely to be single-permit facilities, so they are more likely to have few opportunities readily available to reduce GHG emissions from other parts of their facility."

The SCAQMD has applied its 10,000 MTCO₂e/year significance threshold in such a way that GHG emissions covered by the Cap-and-Trade Program do not constitute emissions that must be measured against the threshold.⁵ However, for purposes of analysis in this MND, the GHG emissions from all of the project's GHG emissions sources are included in the GHG emissions and are measured against the 10,000 MTCO₂e/year significance threshold. Thus, as explained above, based on guidance from the SCAQMD, if an industrial project would emit GHGs less than 10,000 MTCO₂e per year, the project would not be considered a substantial GHG emitter and GHG emission impact would be less than significant, requiring no additional analysis and no mitigation.

CEQA Guidelines 15064.4 (b)(1) states that a lead agency may use a model or methodology to quantify GHGs associated with a project. In October 2017, the SCAQMD in conjunction with CAPCOA released the latest version of the CalEEMod (Version 2016.3.2). The purpose of this model is to estimate construction-source and operational-source emissions from direct and

⁵ For example, the SJVAPCD "determined that GHG emissions increases that are covered under CARB's Cap-and-Trade regulation cannot constitute significant increases under CEQA ..." (SJVAPCD 2014). Furthermore, the SCAQMD has taken this position in CEQA documents it has produced as a lead agency. The SCAQMD has prepared three Negative Declarations and one Draft EIR that demonstrate the SCAQMD has applied its 10,000 MTCO₂e/year significance threshold in such a way that GHG emissions covered by the Cap-and-Trade Program do not constitute emissions that must be measured against the threshold (SCAQMD 2014a, 2014b, 2014c, 2015).

indirect sources. Accordingly, the latest version of CalEEMod has been used for this project to estimate the project's emission impacts (see Appendix A).

Construction Emissions

Construction activities associated with the project would result in emissions of CO₂ and to a lesser extent CH₄ and N₂O. Construction-period GHG emissions were quantified based on the same construction schedule, activities, and equipment list as described in Table 1 and Table 2 above in *Section 2.5.1 Construction Phase Characteristics*. To amortize the emissions over the life of the project, the SCAQMD recommends calculating the total GHG emissions attributable to construction activities, dividing it by the 30-year project life, and then adding that number to a project's annual operational-phase GHG emissions. As such, construction emissions were amortized over a 30-year period (see Appendix A).

Operational Emissions

As described in *Section 4.3 Air Quality*, during operation of the project, there would only be periodic maintenance for the Well and proposed transmission main. The proposed facilities would not require an increase in the number of employees compared to the existing facilities; therefore, routine operations, maintenance, and/or repair would be performed by the City's current existing staff. Additional fuel and emissions for servicing the proposed facilities would be minimal. Furthermore, implementation of the project would increase reliance on local ground water supplies that would reduce the amount of imported water. Importing of water generates higher levels of GHG emissions associated with conveyance as compared to local water supplies that would be generated from this project (at least a 58 percent reduction in water supply electricity, based on CalEEMod default factors⁶). Therefore, impacts to GHG emissions during operation would be considered less than significant.

Emissions Summary

The annual GHG emissions for the project were estimated to be approximately MTCO₂e per year as summarized in **Table 5**. Direct and indirect emissions associated with the project are compared with the SCAQMD proposed screening level for industrial/stationary source projects, which is 10,000 MTCO₂e. As shown in Table 5, the project would result in a less than significant impact with respect to GHG emissions.

TABLE 5
ANNUAL PROJECT GREENHOUSE GAS EMISSIONS

| Emission Source | Total MTCO₂e/year |
|--|-------------------------------------|
| Amortized construction emissions | 21 |
| Energy (Electricity) | 513 |
| Annual CO ₂ e (All Sources) | 534 |
| Significance Threshold | 10,000 |
| Threshold Exceeded? | No |
| SOURCE: Appendix B, ESA 2019. | |

⁶ See: CalEEMod User's Guide, Appendix D, Table 9.2, 2017.

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

Less than Significant Impact. A significant impact would occur if the project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment by conflicting with applicable regulatory plans and policies to reduce GHG emissions as discussed within CARB's Climate Change Scoping Plan, City of Los Angeles' pLAn, and City of Beverly Hills Sustainable City Plan.

The CARB Scoping Plan Update focused on establishing a greenhouse gas reduction target of 40 percent below 1990 levels by 2030. The Project would provide increased access to local water supplies, which would in turn reduce the need for imported water and resulting energy and emissions that come from water conveyance (at least a 58 percent reduction in electricity, based on CalEEMod default factors⁷). Because the CARB Scoping Plan requires a suite of strategies across multiple sectors to achieve the GHG reduction targets, the proposed Project would be consistent by reducing the energy consumption needed for water pumping and treatment with the installation of a new, local Well and rehabilitated/expanded water pipeline infrastructure.

The City of Los Angeles' pLAn, published in April 2019, sets targets to increase renewable energy, source water locally, reduce building energy, reduce vehicle miles traveled and increase zero emission vehicles, build housing, create green jobs, and reduce GHG emissions. Los Angeles' ultimate goal is to reach carbon neutral by 2050. Specific to the Project, pLAn aims to source 70 percent of water locally by 2035 (City of Los Angeles 2019). This Project would help achieve that goal by installing a new, local Well and rehabilitating and expanding water pipeline infrastructure within the City of Los Angeles.

The City of Beverly Hills Sustainable City Plan, published in 2009, provides a framework for prioritizing policies and programs to achieve sustainability. Contributing factors to sustainability include community participation & civic duty, climate protection & air quality, energy, water, land use, transportation & open space, materials & waste, environmental & public health, sustainable local economy, and social equity. The Project is consistent with the Sustainable City Plan's objective to "use water efficiently and effectively while managing storm and waste water in a beneficial manner" and policy to "maximize the availability and use of alternative water sources." As of 2009, Beverly Hills sourced approximately 10 percent of its water from local ground water and 90 percent from Metropolitan Water District (MWD), which imports water from the California State Water Project and Colorado River (City of Beverly Hills 2009). This Project would be consistent with the City of Beverly Hills policies to provide an alternate water source locally and reduce energy use from water conveyance.

Overall, as the project would be consistent with CARB's Climate Change Scoping Plan, City of Los Angeles' pLAn, and City of Beverly Hills Sustainable City Plan, the project would not conflict with an applicable plan, policy, or regulation to reduce GHG emissions. As such, impacts would be considered less than significant.

⁷ See: CalEEMod User's Guide, Appendix D, Table 9.2, 2017.

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4.9 Hazards and Hazardous Materials

| <i>Issues (and Supporting Information Sources):</i> | <i>Potentially Significant Impact</i> | <i>Less Than Significant with Mitigation Incorporated</i> | <i>Less-Than-Significant Impact</i> | <i>No Impact</i> |
|---|---------------------------------------|---|-------------------------------------|-------------------------------------|
| 9. 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Be located on a site 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? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Environmental Evaluation

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. The California Office of Emergency Services oversees state agencies and programs that regulate hazardous materials (Health and Safety Code, Article 1, Chapter 6.95). A hazardous material is any material that because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or environment. The proposed project would require the use of construction vehicles and equipment and thus involve the routine transport, use, storage, and disposal of hazardous materials such as diesel fuel, gasoline, oils, grease, equipment fluids, cleaning solutions and solvents, lubricant oils, and adhesives. If such hazardous materials were not handled properly, in accordance with federal, state and local regulations, a potentially significant hazards to the public or environmental could occur.

Existing federal and state law regulates the handling, storage and transport of hazardous materials and hazardous wastes. Pursuant to the federal Hazardous Materials Transportation Act, 49 U.S.C. § 5101 et seq., the United States Department of Transportation promulgated strict regulations applicable to all trucks transporting hazardous materials. Occupational safety standards have been established in federal and state laws to minimize worker safety risks from both physical and chemical hazards in the workplace, including construction sites. The CalOSHA has primary responsibility for developing and enforcing standards for safe workplaces and work practices in California in accordance with regulations specified in California Code of Regulations (CCR) Title 8. For example, under Title 8 CCR 5194 (Hazard Communication Standard), construction workers must be informed about hazardous substances that may be encountered, and under Title 8 CCR 3203 (Injury Illness Prevention Program) workers must be properly trained to recognize workplace hazards and to take appropriate steps to reduce potential risks due to such hazards. Thus, during construction and operation, contractors and/or City staff handling, storing or transporting hazardous materials or wastes must comply with regulations that would reduce the risk of accidental release and provide protocols and notification requirements should an accidental release occur. Therefore, by complying with relevant federal, state, and local laws, the proposed project would not result in a significant hazard to the public or to the environment through the routine transport, use, or disposal of hazardous materials during implementation of the proposed project.

During operation, the proposed project would not require the routine use of large quantities of hazardous materials at the Well Site. Impacts would be less than significant.

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?

Less than Significant Impact. As discussed above in the response to Question 4.9(a), the proposed project would involve the routine use of hazardous materials during construction and activities; the transport, use, storage and disposal of such hazardous materials would be required to comply with existing applicable federal, state and local regulations. Accidental spills of small amounts of these materials could occur during routine transport, use, storage or disposal, and could potentially injure construction workers, contaminate soil, and/or affect the groundwater below the reservoir. Impacts associated with the accidental release, although localized to the project site, could potentially create a significant hazard to the environment.

In the event of an accidental release during implementation of the proposed project, containment and clean up would be in accordance with existing applicable regulatory requirements. Title 8 CCR 5194 requires preparation of a hazards communication program identifying hazardous materials onsite and reducing the potential for a spill; and 29 CFR 1910.120 includes requirements for emergency response to releases or substantial threats of releases of hazardous substances. Contractors and/or the City would be required to prepare and implement a Hazardous Materials Business Plan, as required under the state Hazardous Materials Release Response Plans and Inventory Act, to manage any hazardous materials they use during construction and operation, respectively. A HMBP is a document containing detailed information on the inventory

of hazardous materials at a facility; Emergency Response Plans (ERP) and procedures in the event of a reportable release or threatened release of a hazardous material; a Site Safety Plan with provisions for training for all workers; a site map that contains north orientation, loading areas, internal roads, adjacent streets, storm and sewer drains, access and exit points, emergency shutoffs, hazardous material handling and storage areas, and emergency response equipment. Further, all spent hazardous materials would be disposed of in accordance with California Department of Toxic Substances Control (DTSC) and County regulations. Construction and maintenance specifications prepared for the proposed project would identify best management practices (BMPs) to ensure the lawful transport, use, storage, and disposal of hazardous materials. Therefore, potential impacts to the public or the environment related to reasonably foreseeable accident conditions involving hazardous materials would be less than significant.

During operation, the proposed project would not require the routine use of hazardous materials at the Well Site or along the transmission main, and thus it is not reasonably foreseeable that accident conditions involving the release of hazardous materials into the environment would occur during operation. Conveyed production well water would be treated at the Foothill WTP under existing City of Beverly Hills permits. Impacts would be less than significant.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

Less than Significant Impact. The project area is located adjacent to and within one-quarter mile of various schools such as Crescent Heights Boulevard Elementary School (**Figure 6, School and Recreational Facilities in the Project Area**). Construction activities would use limited quantities of hazardous materials as described above, which would occur within one-quarter mile of the school facilities. However, the City is required to comply with all relevant and applicable federal, state and local laws and regulations that pertain to the release of hazardous materials during construction activities as described in response to Questions 4.9(a) and 4.9(b). Compliance with all applicable federal, state and local regulations would reduce potential impacts to the public or the environment regarding hazardous waste emissions within one-quarter mile of a school. During operation, there would not be routine use of hazardous materials at the proposed well sites. Impacts would be less than significant.



SOURCE: ESRI; City of Beverly Hills; City of Los Angeles

La Brea Subarea Well and Transmission Main Project

Figure 6
School and Recreational Facilities in the Project Area

- 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?**

Less than Significant with Mitigation Incorporated. A review of the Department of Toxic Substances Control's (DTSC) Hazardous Waste and Substances List – Site Cleanup (Cortese List) indicates that there are no identified hazardous material sites located within the proposed Well Site, the Foothill WTP, or within Chariton Street, La Cienega Boulevard, Olympic Boulevard, Le Doux Road, Clifton Way, North Swall Drive, Dayton Way, North Palm Drive, or 3rd Street where the proposed transmission main would travel (DTSC 2019a). A database search of hazardous materials sites using the online DTSC EnviroStor and State Water Resources Control Board (SWRCB) GeoTracker databases identified zero hazardous clean-up sites within these same project areas (DTSC 2019b; SWRCB 2019). Construction activities associated with the proposed well could encounter contaminated soil and/or groundwater during excavation, thereby posing a health threat to construction workers, the public, and the environment.

As standard procedure for siting groundwater wells, an environmental assessment of the proposed location would be conducted to ensure soil and groundwater contamination is avoided.

Mitigation Measures HAZ-1 and HAZ-2 would require that these site-specific studies be conducted prior to selecting suitable sites in order to identify local contamination. These studies would identify recommendations and cleanup measures to reduce risk to the public and the environment from existing hazardous waste sites. Therefore, impacts to the public or the environment related to hazardous materials sites would be less than significant.

Mitigation Measures

HAZ-1: Prior to the initiation of any construction requiring ground-disturbing activities, the City shall complete an environmental assessment of the proposed site to locate the potential for soil and groundwater contamination in the project area. The recommendations set forth in the site assessment shall be implemented to the satisfaction of applicable agencies before and during construction.

HAZ-2: If the site assessments determine that the site has contaminated soil and/or groundwater, a Soil and Groundwater Management Plan shall be prepared that specifies the method for handling and disposing of contaminated soil and groundwater prior to demolition, excavation, and construction activities. The City shall be responsible for ensuring implementation of the Plan in compliance with applicable regulations.

- e) **For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?**

No Impact. The nearest airport to the project area is the Santa Monica Airport, located approximately 4.6 miles southwest of the project area. The proposed project is not located within an airport land use plan or within 2 miles of a public airport or public use airport. No impact would occur.

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

Less than Significant with Mitigation Incorporated. The proposed Well Site would not impair implementation of or physically interfere with adopted emergency response plans or emergency evacuation plans. There would be no installation of well facilities within public rights-of-way and no possibility of interfering with evacuation routes. During construction, truck haul trips would transport construction and debris materials to and from project sites; however, these trips would not impact the roadway in a way that would impede emergency evacuations. The truck trips would not require closure of any roadways and would only temporarily slow traffic near the project sites. Project-related vehicles would not block existing street access to the sites. Therefore, no impacts related to an emergency response or evacuation plan would occur.

Operation of the proposed well facilities would not impair or physically interfere with an adopted emergency response plan or emergency evacuation plan. The facilities all consist of groundwater retrieval infrastructure which, during operation, would not interfere with traffic flows. However, aboveground well facilities would require periodic maintenance. Maintenance activities would be random and require minimal trips that would not significantly impact the surrounding roadways. Impacts related to an adopted emergency plan would be considered less than significant during operation.

The proposed transmission main would be rehabilitated and constructed within public rights-of-way. This construction activity could potentially block access to roadways and driveways for emergency vehicles. The construction-related impacts, although temporary, could potentially impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. However, the implementation of **Mitigation Measure HAZ-3** would require the preparation of a Traffic Control Plan with comprehensive strategies to reduce disruption to emergency access. Therefore, with implementation of mitigation measures, potential significant impacts to emergency access would be reduced to less than significant levels.

Following construction, operation of the pipelines would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan as they would be located underground. Impacts related to an adopted emergency plan would be less than significant during operation.

Mitigation Measures

HAZ-3: In conjunction with **Mitigation Measure TR-1**, prior to initiating construction of the transmission main within roadway rights-of-way, the City shall prepare and implement a Traffic Control Plan that contains comprehensive strategies for maintaining emergency access. Strategies shall include, but are not limited to, maintaining steel trench plates at the construction sites to restore access across open trenches and identification of alternate routing around construction zones. In addition, police, fire, and other emergency service providers shall be notified of the timing, location, and duration of the construction activities and the location of detours and lane closures. The City shall ensure that the Traffic Control Plan and other construction activities are consistent with the Los Angeles County Operational Area Emergency Response Plan.

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

No Impact. The project area is located within a highly developed area containing little to no vegetation. The project area is located within a State/Federal Responsibility Area (SRA), Non-Very High Fire Hazard Severity Zone (Non-VHFHSZ) (CAL FIRE 2011). Therefore, implementation of the proposed project would not create hazardous fire conditions or expose construction workers to wildfire risks. No impacts would occur.

References

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- DTSC, 2019b. EnviroStor Database. Available online at: <https://www.envirostor.dtsc.ca.gov/public/>, accessed June 2019.
- State Water Resources Control Board (SWRCB), 2019. GeoTracker. Available online at: <https://geotracker.waterboards.ca.gov/>, accessed June 2019.
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4.10 Hydrology and Water Quality

| <i>Issues (and Supporting Information Sources):</i> | <i>Potentially Significant Impact</i> | <i>Less Than Significant with Mitigation Incorporated</i> | <i>Less-Than-Significant Impact</i> | <i>No Impact</i> |
|---|---------------------------------------|---|-------------------------------------|--------------------------|
| 10. HYDROLOGY AND WATER QUALITY — Would the project: | | | | |
| a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or river or through the addition of impervious surfaces, in a manner which would: | | | | |
| i) result in substantial erosion or siltation on- or off-site; | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| iii) create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| iv) impede or redirect flood flows? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Environmental Evaluation

Would the Project:

- a) **Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?**

Less than Significant Impact. Construction and demolition activities including grading, excavation, and backfilling would result in substantial soil disturbance and exposure onsite. Disturbed and exposed soils could be moved by wind and water and result in erosion and sedimentation of stormwater runoff. Construction of the proposed well, 15-inch Stormdrain, transmission main, and demolition equipment would use chemicals and solvents such as fuel and lubricating grease for motorized heavy equipment, which could also come into contact with stormwater by way of inadvertent spills or releases (For more discussion of this topic please refer to Section 4.9, *Hazards and Hazardous Materials*). Due to the age of the residential structure at Well Site, hazardous materials may be encountered during demolition that could also mix with

stormwater. Therefore, proposed project construction and demolition has the potential to affect water quality.

Since construction and demolition would disturb an area greater than an acre, the project would be subject to a Construction General Permit (CGP) under the National Pollutant Discharge Elimination System (NPDES) permit program of the federal Clean Water Act. As required under the CGP, the City or its contractor would prepare and implement a Storm Water Pollution Prevention Plan (SWPPP). The objectives of a SWPPP is to identify pollutant sources (such as sediment) that may affect the quality of storm water discharge and to implement best management practices (BMPs) to reduce pollutants in storm water.

In particular, erosion control BMPs would be used to prevent the degradation of water quality in the construction area. Other BMPs that could be used to enhance erosion control include scheduling to avoid wet weather events; preservation of existing vegetation where feasible; hydraulic mulching; hydroseeding; using soil binders; straw mulching; using geotextiles, plastic covers, and erosion control blankets/mats; and wood mulching. Examples of erosion control BMPs are installing a silt fence; creating a sediment/desilting basin; installing sediment traps; installing check dams; using fiber rolls; creating gravel bag berms; street sweeping and vacuuming; creating a sandbag barrier; creating a straw bale barrier; and storm drain inlet protection. BMPs would also include practices for proper handling of chemicals such as avoidance of fueling at the construction site and overtopping during fueling, and installation of containment pans. Further, implementation of the construction BMPs would be consistent with the Los Angeles County Stormwater Program and would begin with the commencement of demolition and construction and continue through the completion of the proposed well and transmission main (LA Public Works 2019). Implementation of the SWPPP and BMPs in compliance with the NPDES permitting requirements would avoid or reduce all erosion and sedimentation impacts to below a level of significance during construction.

The proposed 15-inch storm drain (pump-to-waste pipeline) would be constructed within Chariton Street, to connect to existing utilities within the local streets. Once the well is operational, typical procedure is to “pump-to-waste” for a short duration to flush the well system. Flushed well water and stormwater runoff at the Well Site would be captured to comply with Los Angeles County Stormwater Program and conveyed through the proposed pump-to-waste line to the storm drain. Development water from the proposed well would be discharged to the storm drain pursuant to California Regional Water Quality Control Board Los Angeles Region ORDER NO. R4-2003-0108 (CAG994005), covering Discharges of Groundwater from Potable Supply Wells to Surface Water. Therefore, no substantial adverse impacts to water quality would occur and operational impacts would be less than significant.

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

Less than Significant Impact.

Construction

During construction, the project area would be watered during dry and windy conditions to prevent dust and debris from migrating off-site. The demand for construction watering would be minor and temporary during intermittent construction times. Further, historic groundwater levels in the project area suggest that no dewatering would be required during construction of the well facilities or transmission main (LADWP 2011). Therefore, the proposed project facilities would not directly interfere with groundwater supplies or interfere substantially with groundwater recharge during construction. Impacts would be less than significant.

Operation

The objective of the project is to extract available groundwater within the La Brea Subarea within safe and available limits and treat the water at the Foothill WTP for the City of Beverly Hill's use. The project is intended to provide additional water supply to the City as an objective of the City's 2015 Final Urban Water Management Plan (2016) to accommodate planned demand for the City and reduce reliability on imported water from MWD. The City has conducted substantial research to estimate the amount of groundwater currently available in the Subbasin and to quantify the amount that is available for extraction without impacting other groundwater recharge sources. The only known active water well in the La Brea Subarea is a privately-owned well used to supply irrigation water to a few tens of acres of lawns at a condominium complex in the southern portion of the Subarea (Michael Baker International 2017). Very little information is available for this well; however, the City's implementation of the Well Site would not substantially impact local groundwater availability or levels at this existing well due to the distance between the existing and proposed wells in the Subarea. Historically, the City extracted approximately 4,460 AFY of groundwater from 16 wells that operated in the Subarea at various times during the period between 1950 and 1974. In 1976, Beverly Hills decided to discontinue producing water from the La Brea Subarea in favor of purchasing all of their water supply from MWD (Michael Baker International 2017; LADWP 2011). However, the City retained its "rights" to extract groundwater from the Subarea for future use by submitting annual statements to the SWRCB. The safe yield⁸ for the La Brea Subarea was determined to be approximately 3,000 AFY (LADWP 2011; City of Beverly Hills 2016).

The groundwater supply (1,700 AFY) to be provided by the project is not only consistent with the City's projected water demand within their Urban Water Management Plan (City of Beverly Hills 2016). Given that the City is substantially built out/developed and therefore, would not introduce new development or population that would potentially increase the demand for water within the City. Further, 1,700 AFY is within the safe yield of the Subarea (LADWP 2011; City of Beverly

⁸ "Safe yield" refers to the amount of water that can be withdrawn from a groundwater basin aquifer without producing an undesired effect, such as substantially depleting groundwater levels or interfering with groundwater recharge.

Hills 2016). The safe yields of groundwater basins are calculated by water management agencies in order to protect groundwater resources and thus not depleting the groundwater supply. Therefore, implementation of the proposed production well would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the Central Basin (where the La Brea Subarea is located).

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or river or through the addition of imperious surfaces, in a manner which would:

i) result in substantial erosion or siltation on- or off-site;

Less than Significant Impact. Construction and demolition activities would disturb and expose soil, which could be moved by wind and water, resulting in erosion and sedimentation of stormwater runoff. Since construction and demolition would exceed an acre, these activities must comply with the SWRCB Construction General Permit. As discussed in Question 4.7(a) and 4.10(a), above, the City would prepare a SWPPP that includes erosion and sediment control BMPs implemented during construction and demolition to protect water quality. Compliance with the SWPPP would ensure a less than significant impact during construction.

Once constructed, the proposed facilities would not alter drainage from any of the sites. The Well Site is currently developed with impermeable surfaces and drains to the storm drains within Chariton Street. Once constructed, the well facilities would have a smaller scale than the existing structure, but would not make the Well Site more impermeable than existing conditions. Similarly, once constructed, the transmission main would be underground and the disturbed areas would be repaved and return to previous site conditions. Therefore, implementation of the proposed project facilities would not result in substantial erosion or siltation on or offsite. Impacts would be less than significant.

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

Less than Significant Impact. Demolition of existing structures and construction of new facilities at the Well Site would permanently alter the site's topography. The project would demolish existing structures onsite and provide new well facilities and paving. Stormwater runoff at the Well Site would be captured onsite and conveyed through proposed pump-to-waste drains or flow to existing stormdrains within the general area, consistent with the Los Angeles County Stormwater Program. The proposed well facilities would not have the scale or massing to alter flows in a way such that flooding may occur. Further, the proposed transmission main would be implemented within areas currently developed and paved, either within public ROWs or within sidewalks. After transmission main implementation, the pipelines would be underground and the project area would return to existing conditions and repaved. Therefore, implementation of the proposed well facilities and transmission main would not increase surface runoff or flow in a way such that flooding would occur. Therefore, impacts would be less than significant.

- iii) **create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or**

Less than Significant Impact. The project would require implementation of a SWPPP, including BMPs for erosion control and for proper handling of chemicals. As such, construction of the proposed project would not provide substantial additional sources of polluted runoff into stormdrain systems.

The Well Site and transmission main project areas are currently largely paved and already contribute stormwater runoff. Implementation of the well facilities and transmission main would not increase the amount of impermeable surfaces or natural drainage direction of stormwater flows. Once constructed, the project would not substantially increase runoff from any of the sites into local stormdrains or the Well Site proposed stormdrain (pump to waste). The proposed Well Site is designed to accommodate stormwater flows and well-flushing water through the proposed stormdrain (pump-to-waste) line. The stormdrain is sized appropriately to capture all flows. As such, the proposed project would not contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems. Any impacts would be less than significant.

- iv) **impede or redirect flood flows?**

Less than Significant Impact. The Federal Emergency Management Agency (FEMA) National Flood Hazard Layer for the project area (Panel No. 0637C1595G) shows that the project area is largely within an area of minimal flood hazard. The Well Site and the entirety of the proposed transmission main would not be located within a flood hazard zone (FEMA 2018). Further, none of the new well facilities would have the scale or massing to substantially alter flood flows within the already highly developed project area. Therefore, impacts would be considered less than significant.

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

Less than Significant Impact. The proposed project is largely in an area with no flood risk. A SWPPP would be prepared and implemented during construction activities to ensure proper handling of chemicals and avoid release of pollutants to the project site. As such, impacts due to potential release of pollutants in a flood hazard area would be less than significant.

A seiche is a wave set up on a river, reservoir, pond, or lake when seismic waves from an earthquake pass through the area (USGS 2019a). The project area is not located near a body of water, therefore, there would be no potential impacts associated with the risk of release of pollutants due to project inundation from a seiche.

A tsunami is a sea wave of local or distant origin that results from large-scale seafloor displacements associated with earthquakes, major submarine slides or exploding volcanic islands (USGS 2019b). An event such as an earthquake creates a large displacement of water resulting in a rise or mounding at the ocean surface that moves away from this center as a sea wave. The project area is located approximately 7 miles east of the Pacific Ocean and is not located within

the tsunami risk zone. Therefore, the proposed project would not be subject to tsunamis and would not risk release of pollutants due to project inundation from a tsunami. No impacts would occur.

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

Less than Significant Impact. The Los Angeles RWQCB Water Quality Control Plan (Basin Plan) sets water quality objectives that are qualitative and quantitative in order to protect the beneficial uses within the basin. The water quality constituents that have numerical limits for groundwater include: arsenic, bacteria, barium, boron, chloride, cyanide, total dissolved solids, fluoride, metals, Methylene Blue-Activated Substances, pH, radioactivity, sodium, and sulfate. As described in Section 4.3 and Question 4.7(b) above, construction activities would require water for dust control; however, all water would be sourced from treated water onsite and not from groundwater. As discussed in Question 4.10(b), the project would not interfere with groundwater management of the La Brea Subbasin. As a result, the project would not conflict with the implementation of a water quality control plan or groundwater management plan, and impacts would be less than significant.

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4.11 Land Use and Land Use Planning

| <i>Issues (and Supporting Information Sources):</i> | <i>Potentially Significant Impact</i> | <i>Less Than Significant with Mitigation Incorporated</i> | <i>Less-Than-Significant Impact</i> | <i>No Impact</i> |
|---|---------------------------------------|---|-------------------------------------|-------------------------------------|
| 11. LAND USE AND LAND USE PLANNING — Would the project: | | | | |
| a) Physically divide an established community? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Environmental Evaluation

Would the Project:

a) Physically divide an established community?

No Impact. The proposed project does not propose any action that could divide an established community. The physical division of an established community generally refers to the construction of a feature such as an interstate highway or railroad tracks, or removal of a means of access, such as a local road or bridge that would impact mobility within an existing community or between a community and outlying area. Given the proposed project would construct the proposed well and a transmission main within a highly developed area, the proposed project would result in no impact to the physical division of an established community.

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

Less than Significant Impact. The proposed transmission main would be installed within or adjacent to local rights-of-way and would not conflict with land use designations or be incompatible with neighboring land uses. In addition, once constructed, the proposed transmission main would not pose long-term incompatibility with land uses. As described above in Section 2.3, the proposed Well Site would be implemented within City-owned property in an area with a land use designation of Low Medium II Residential and zoned RD2-1 (City of Los Angeles 2019). Pursuant to Government Code Sections 53091(d) and (e), building and zoning ordinances of cities or counties do not apply to the location or construction of facilities for the projection, generation, storage, treatment, or transmission of water (California Legislative Information 2003). Therefore, any well facilities that may be inconsistent with the City of Los Angeles General Plan land use designations would not be subject to a conditional use permit or general plan amendment. However, the proposed well would be contained within a well-house designed to blend in with surrounding environment. Further, all operational sounds would be within allowable limits within a residential area (see Section 4.13, *Noise* for more information). The City would coordinate directly with the City of Los Angeles to ensure operations of the well facilities would be compatible with existing adjacent land uses, if necessary. Therefore, impacts would be less than significant.

References

California Legislative Information, 2003. Government Code, Article f. Regulation of Local Agencies by Counties and Cities. Available online at: https://leginfo.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV§ionNum=53091, accessed June 2019.

City of Los Angeles, 2019. ZIMAS. Available online at: <http://zimas.lacity.org/>, accessed June 2019.

4.12 Mineral Resources

| <i>Issues (and Supporting Information Sources):</i> | <i>Potentially Significant Impact</i> | <i>Less Than Significant with Mitigation Incorporated</i> | <i>Less-Than-Significant Impact</i> | <i>No Impact</i> |
|--|---------------------------------------|---|-------------------------------------|-------------------------------------|
| 12. 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Environmental Evaluation

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?**

No Impact. According to the USGS Mineral Resources Data System (USGS 2019), the project area is not identified as a known mineral resource area and does not have a history of mineral extraction uses. In addition, according to the State of California Department of Conservation, Division of Oil, Gas, and Geothermal Resources, no oil or gas wells exists within the project area (CDC 2019). The Surface Mining and Reclamation (SMARA) Mineral Land Classification prepared by CGS indicates that the project area primarily consists of Mineral Resource Zone 1 (MRZ-1) and MRZ-3 areas (CGS 1994; City of Los Angeles 2001; City of Beverly Hills 2010). An MRZ-1 designation is assigned to CGS study areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence; an MRZ-3 designation is assigned to CGS study areas containing mineral deposits whose significance cannot be evaluated due to inadequate subsurface data (CGS 1994). Therefore, the proposed project would not result in the loss of availability of a known mineral resource, and no impacts would occur.

- 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 City of Los Angeles and City of Beverly Hills Conservation Elements (City of Los Angeles 2001; City of Beverly Hills 2010) do not identify the project area as a mineral resource recovery zone. Therefore, the implementation of the proposed project would not result in the loss of a locally important mineral resource recovery site. No impacts would occur.

References

- CDC, 2019. DOGGR Well Finder. Available online at: <https://www.conservation.ca.gov/dog/Pages/WellFinder.aspx>, accessed June 2019.
- CGS, 1994. *Update of Mineral Land Classification of Portland Cement Concrete Aggregate in Ventura, Los Angeles, and Orange Counties, CA. Part II, LA County*. 1994.
- City of Beverly Hills, 2010. Conservation. Available online at: http://www.beverlyhills.org/cbhfiles/storage/files/filebank/10283--7_Conservation%2001122010.pdf, accessed June 25, 2019.
- City of Los Angeles, 2001. Conservation Element of the City of Los Angeles General Plan. Available online at: <https://planning.lacity.org/cwd/gnlpln/consvelt.pdf>, accessed June 2019.
- United State Geologic Survey (USGS), 2019. Mineral Resource Data System (MRDS). Available online at: <https://mrdata.usgs.gov/mrds/>, accessed June 2019.
-

4.13 Noise

| <i>Issues (and Supporting Information Sources):</i> | <i>Potentially Significant Impact</i> | <i>Less Than Significant with Mitigation Incorporated</i> | <i>Less-Than-Significant Impact</i> | <i>No Impact</i> |
|---|---------------------------------------|---|-------------------------------------|-------------------------------------|
| 13. NOISE — Would the project result in: | | | | |
| a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Generation of excessive groundborne vibration or groundborne noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Discussion

Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound power levels to be consistent with that of human hearing response, which is most sensitive to frequencies around 4,000 Hertz (about the highest note on a piano) and less sensitive to low frequencies (below 100 Hertz). Because of the logarithmic scale of the decibel unit, sound levels cannot be added or subtracted arithmetically. If a sound's physical intensity is doubled, the sound level increases by 3 dBA, regardless of the initial sound level; i.e., 60 dBA plus 60 dBA equals 63 dBA. However, where noise levels of different levels are combined, the change in noise level would be less than 3 dB; i.e., 70 dBA plus 60 dBA equals 70.4 dBA.

Noise that is experienced at any receptor can be attenuated by distance or the presence of noise barriers or intervening terrain. Sound from a single source (i.e., a point source) radiates uniformly outward as it travels away from the source in a spherical pattern. The sound level attenuates (or drops off) at a rate of 6 dBA for each doubling of distance. For acoustically absorptive, or soft, sites (i.e., sites with an absorptive ground surface, such as soft dirt, grass, or scattered bushes and trees), an excess ground attenuation value of 1.5 dBA per doubling of distance is normally assumed. A large object or barrier in the path between a noise source and a receiver can substantially attenuate noise levels at the receiver. The amount of attenuation provided by this shielding depends on the size of the object, proximity to the noise source and receiver, surface weight, solidity, and the frequency content of the noise source. Natural terrain features (such as hills and dense woods) and human-made features (such as buildings and walls) can substantially reduce noise levels. Walls are often constructed between a source and a receiver specifically to reduce noise. A barrier that breaks the line of sight between a source and a receiver will typically result in at least 5 dBA of noise reduction.

The proposed project would be located within two jurisdictions; the City of Beverly Hills and the City of Los Angeles. The proposed Well Site would be located in the City of Los Angeles, currently developed with a residential structure. The proposed transmission main would be

approximately four miles long located within roadways primarily within the City of Los Angeles, with a portion located in the City of Beverly Hills, as shown in Figure 2.

The Noise Element of the City of Beverly Hills General Plan contains noise goals and policies that address unnecessary, excessive, and annoying noise levels and sources, such as vehicles, construction, and stationary sources (e.g., heating and cooling systems, mechanical rooms, etc.). Potentially sensitive land uses in the City of Beverly Hills include residences (including residences for the elderly), schools, churches, and libraries. Commercial uses are not defined as noise sensitive receptors. The City of Beverly Hills noise ordinance (BHMC Section 5-1-201 and subsequent) includes noise standards and regulations:

Section 5-1-202 prohibits any person from operating machinery or mechanical devices in a manner which creates a noise increase of more than 5 dBA above the ambient noise level at any property outside the hours permitted by the City's noise ordinance for construction activity.

Section 5-1-205 of the BHMC prohibits construction activity between the hours of 6:00 PM and 8:00 AM any day, and on Sundays and public holidays. Further, construction work within 500 feet of a residential zone is prohibited on Saturdays.

Section 5-1-206 of the BHMC prohibits any person to create any noise on any street, sidewalk, or public place adjacent to any school, institution of learning, or church while the same is in use, or adjacent to any hospital; which noise substantially and unreasonably interferes with the workings of such institutions.

The Noise Element of the City of Los Angeles General Plan includes a number of goals, objectives, and policies for land use planning purposes to limit exposure of citizens to excessive noise levels. The City of Los Angeles Municipal Code (LAMC) noise ordinance includes noise standards and regulations.

Section 111.01 and Section 111.03 of the LAMC define the ambient noise as the actual measured ambient noise level or the City's presumed ambient noise level, whichever is greater. The actual ambient noise level is the measured noise level averaged over a period of at least 15 minutes Leq.

Section 111.02 of the LAMC provides procedures and criteria for the measurement of the sound level of "offending" noise sources. In accordance with the LAMC, a noise level increase of 5 dBA over the existing average ambient noise level at an adjacent property line is considered a noise violation. To account for people's increased tolerance for short-duration noise events, the Noise Regulation provides a 5 dBA allowance for noise occurring more than five but less than fifteen minutes in any one-hour period and an additional 5 dBA allowance (total of 10 dBA) for noise occurring five minutes or less in any one-hour period.

Section 112.02 limits increases in noise levels from air conditioning, refrigeration, heating, pumping and filtering equipment. Such equipment may not be operated in such

manner as to create any noise which would cause the noise level on the premises of any other occupied property, or, if a condominium, apartment house, duplex, or attached business, within any adjoining unit, to exceed the ambient noise level by more than 5 dBA.

Section 112.05 of the LAMC sets a maximum noise level for construction equipment of 75 dBA at a distance of 50 feet when operated within 500 feet of a residential zone. Compliance with this standard is required only where “technically feasible.”

Section 41.40 of the LAMC prohibits construction between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, 6:00 P.M. and 8:00 A.M. on Saturday, and at any time on Sunday (i.e., construction is allowed Monday through Friday between 7:00 A.M. to 9:00 P.M.; and Saturdays and National Holidays between 8:00 A.M. to 6:00 P.M.). In general, the City’s Department of Building and Safety enforces noise ordinance provisions relative to equipment and the Los Angeles Police Department enforces provisions relative to noise generated by people. However, the provisions of Section 41.40(a) shall not apply to any person who performs the construction, repair or excavation work involved pursuant to the express written permission of the Board of Police Commissioners through its Executive Director. The Executive Director on behalf of the Board, may grant this permission, upon application in writing, where the work purposed to be done is in the public interest, or where hardship or injustice, or unreasonable delay would result from its interruption during the hours mentioned above, or where the building or structure involved is devoted or intended to be to be developed to a use immediately related to public defense. The City allows project applicants to obtain permission to conduct construction outside of the hours specified above. In these cases, a project applicant must obtain the express written permission of the Board of Police Commissioners through its Executive Director. The Executive Director, on behalf of the Board, may grant this permission upon application in writing where the work purposed to be done is in the public interest, or where hardship or injustice, or unreasonable delay would result from its interruption during the hours mentioned above.

Environmental Evaluation

Would the Project result in:

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

Less than Significant with Mitigation Incorporated. As shown in Table 1 in Section 2, Project Description, construction of the Project would occur in four phases over a total of 13 months from October 2019 to December 2020. The construction of the well components would happen concurrently with the pipeline rehabilitation and transmission main installation. Maximum daily activities would involve up to 10 workers for well-site construction and 10 workers for the pipeline rehabilitation and transmission main installation.

The existing land uses surrounding the project area, include community commercial, general commercial, and neighborhood office commercial, where the transmission main alignment would be located along La Cienega Boulevard leading to the proposed location of the Well Site. Other existing land uses in the overall project area include: public facilities, low residential, medium residential, educational, open space, places of worship, and industrial. The portion of the transmission main in the City of Beverly Hills is surrounded by single-family residential, multi-family residential, commercial, and public schools (City of Beverly Hills 2019; City of Los Angeles 2019). The closest noise sensitive receptors to Well Site are the residential uses adjacent on either side of the well site, as close as approximately 25 feet. The closest noise sensitive receptors to the pipeline rehabilitation and transmission main installation are residential, motel, and places of worship along La Cienega Boulevard and mainly residential and open space uses on the other roadways the pipeline travels along. Noise sensitive receptors along the pipeline route are assumed to be as close as approximately 25 feet from the active construction site.

To characterize the ambient noise levels at noise sensitive receptors, ESA conducted eight short-term (15-minute duration) and one long-term (24-hour duration) ambient noise measurements at the property line of noise sensitive receptors located along the proposed pipeline alignment and the well location, as shown on **Figure 7, Noise Measurement Locations. Table 6, Ambient Noise Levels**, provides the ambient noise levels measured and noise sources observed at each location.

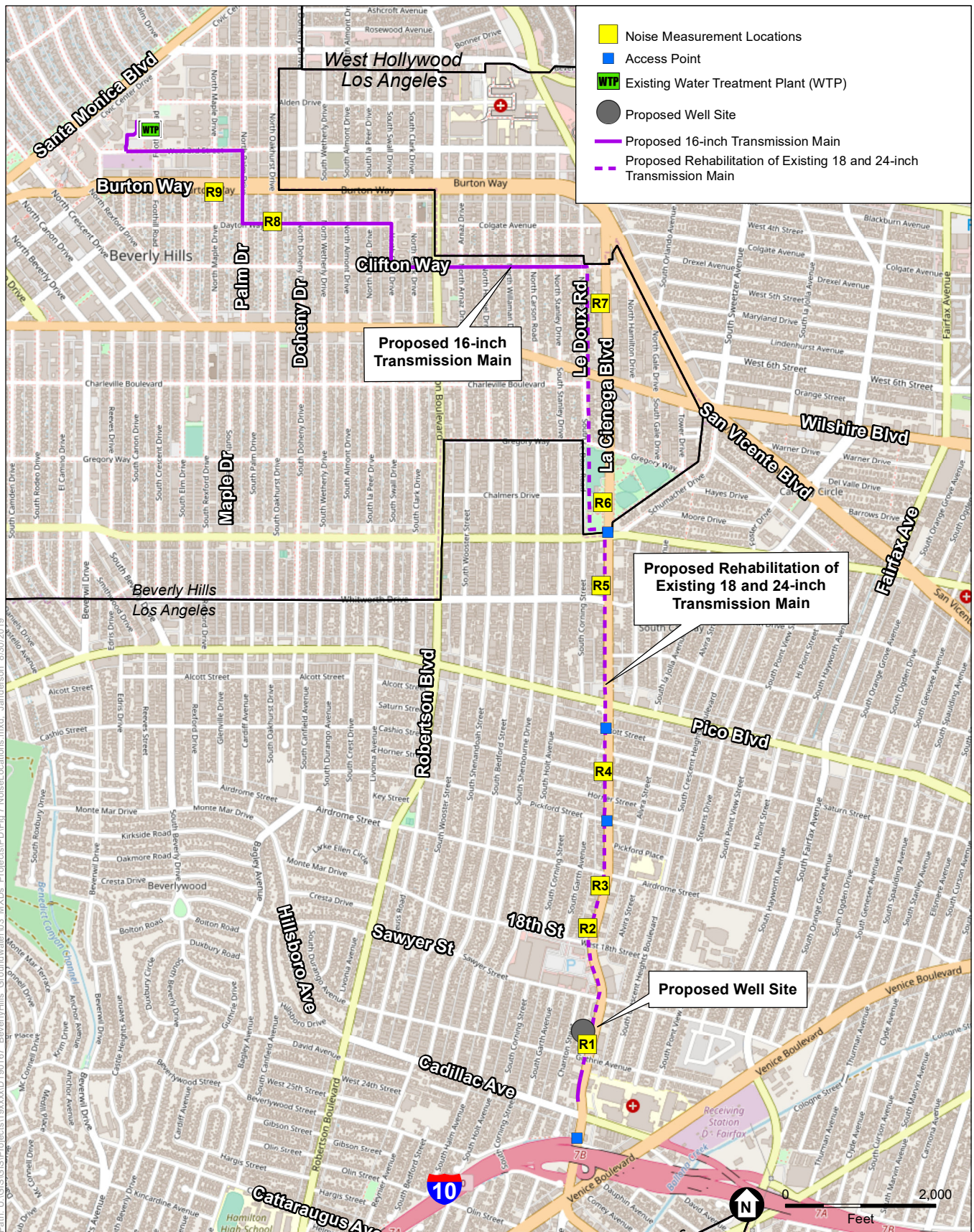
TABLE 6
AMBIENT NOISE LEVELS

| Receptor Location | Approximate Distance to Project Site (feet) | Measured Daytime Ambient Noise Levels, (dBA L_{eq}) | Measured Nighttime Ambient Noise Levels,^a (dBA L_{eq}) |
|---|--|--|--|
| R1. Well Location | 25 | 55.9 | 49.6 |
| R2. Park Cienega Motel | 25 | 78.3 | 73.8 |
| R3. La Cienega Motel | 25 | 74.4 | 74.7 |
| R4. Grand Motel | 25 | 75.0 | 74.0 |
| R5. Multi-family residential/Pressman Academy/Temple Beth Am | 25 | 70.7 | 74.7 |
| R6. Multi-family residential/La Cienega Park/The Academy Library | 25 | 63.3 | N/A ^b |
| R7. Single-family residential along N. Le Doux Road near Clifton Way/Pentecostal Mission of Beverly Hills | 25 | 61.8 | N/A ^b |
| R8. Single-family residential along Dayton Way near N Oakhurst Drive | 25 | 54.2 | N/A ^b |
| R9. Single-family residential along N Maple Drive near Burton Way | 25 | 57.9 | N/A ^b |

SOURCE: ESA, 2019

^a Nighttime noise measurements were taken at locations where nighttime work is expected to occur and is all assumed within Los Angeles and along La Cienega Boulevard.

^b N/A denotes that no nighttime measurements were taken because no nighttime work would occur at this receptor.



SOURCE: ESRI; City of Beverly Hills; City of Los Angeles

La Brea Subarea Well and Transmission Main Project

Figure 7
Noise Measurement Locations

Noise from on-site construction activities would be generated by the use of equipment involved during various stages of construction. The noise levels generated by construction equipment would vary depending on factors such as the type and number of equipment, the specific model (horsepower rating), the construction activities being performed, and the maintenance condition of the equipment. Individual pieces of construction equipment anticipated to be used during project construction could produce maximum noise levels of 75 to 85 dBA Lmax at a reference distance of 50 feet from the noise source, as shown in **Table 7, Construction Equipment and Maximum Noise Levels**. These maximum noise levels would occur when equipment is operating under full power conditions. The estimated usage factor for the equipment is also shown in Table 7. The usage factors are based on the Federal Highway Administration (FHWA) Roadway Construction Noise Model User's Guide (FHWA 2006).

TABLE 7
CONSTRUCTION EQUIPMENT AND MAXIMUM NOISE LEVELS

| Source | Estimated Usage Factor (%) | Reference Noise Level at 50 feet (dBA Lmax) |
|------------------------|----------------------------|---|
| Air Compressor | 50% | 78 |
| Bore/Drill Rig Truck | 20% | 79 |
| Crane | 40% | 81 |
| Dozer | 40% | 82 |
| Dump/Haul Truck | 40% | 76 |
| Excavator | 40% | 81 |
| Forklift | 10% | 75 |
| Generator Set | 50% | 81 |
| Jaw Crusher | 10% | 84 |
| Other Equipment | 50% | 85 |
| Pump | 50% | 81 |
| Tractor/Loader/Backhoe | 25% | 80 |

SOURCE: FHWA 2006

To characterize construction-period noise levels, the hourly Leq noise level associated with each construction phase is estimated based on the quantity, type, and usage factors for each type of equipment used during each construction phase and are typically attributable to multiple pieces of equipment operating simultaneously. Over the course of a construction day, the highest noise levels would be generated when multiple pieces of construction equipment are operated concurrently.

The estimated noise levels at noise sensitive receptors were calculated using the FHWA's RCNM and were based on a maximum concurrent operation of construction equipment, which is considered a worst-case evaluation because the project would typically use less equipment simultaneously, and as such would generate lower noise levels. See **Appendix D** for the noise calculation worksheets. The nearest sensitive receptors to the construction areas would be residential, educational, motel, and religious land uses. **Table 8, Unmitigated Maximum**

Construction Noise Levels at Sensitive Receptors, shows the estimated maximum construction noise levels that would occur at the nearest off-site sensitive uses during a peak day of construction activity.

TABLE 8
UNMITIGATED MAXIMUM CONSTRUCTION NOISE LEVELS AT SENSITIVE RECEPTORS

| Source | Approximate Distance to Project Site (feet) | Maximum Construction Noise Level (dBA Leq) | Daytime Significance Threshold ^a | Significant Impact? | Nighttime Significance Threshold ^b | Significant Impact? |
|---|---|--|---|---------------------|---|---------------------|
| R1. Well Location | 25 | 91 | 60.9 | Yes | 54.6 | Yes |
| R2. Park Cienega Motel | 25 | 87 | 83.3 | Yes | 78.8 | Yes |
| R3. La Cienega Motel | 25 | 87 | 79.4 | Yes | 79.7 | Yes |
| R4. Grand Motel | 25 | 87 | 80.0 | Yes | 79.0 | Yes |
| R5. Multi-family residential/ Pressman Academy/Temple Beth Am | 25 | 87 | 75.7 | Yes | 79.7 | Yes |
| R6. Multi-family residential/La Cienega Park/The Academy Library | 25 | 87 | 68.9 | Yes | N/A | N/A |
| R7. Single-family residential along N. Le Doux Road near Clifton Way/Pentecostal Mission of Beverly Hills | 25 | 87 | 66.8 | Yes | N/A | N/A |
| R8. Single-family residential along Dayton Way near N Oakhurst Drive | 25 | 87 | N/A | N/A | N/A | N/A |
| R9. Single-family residential along N Maple Drive near Burton Way | 25 | 87 | N/A | N/A | N/A | N/A |

SOURCE: FHWA 2006, ESA 2019.

^a Daytime thresholds included for City of LA receptors and City of Beverly Hills receptors that are considered sensitive under BHMC Section 5-1-206.

^b Nighttime thresholds included for areas where night work would occur.

Construction in the City of Los Angeles would occur Monday through Friday, within the hours of 7:00 A.M. and 6:00 P.M., but may include 24-hour construction along La Cienega Boulevard. The project construction contractor will obtain a noise variance from the City of Los Angeles for any work occurring outside the hours of 7:00 a.m. and 8:00 p.m., and for any holiday or weekend work, in compliance with local regulations. Construction noise is considered a significant impact if the activity increases the measured ambient noise levels by 5 dBA during any time of the day. Table 8, above, compares the estimated construction noise levels to the ambient noise levels plus 5 dBA as measured at locations R1 through R9.

In the City of Beverly Hills, construction noise is considered a significant impact if the Project construction occurs outside of the allowable construction hours of 8 A.M. to 6 P.M. Furthermore, if the construction activity happens near any institution of learning, hospital, or church at any

time of day, the construction activity may not exceed 5 dBA greater than the measured ambient noise levels.

Additionally, the daytime construction in the City of Beverly Hills would occur near a church and library (R6 and R7), and therefore, is subject to BHMC Section 5-1-206. Activity at other receptors in the City of Beverly Hills (R8 and R9) would comply with the allowable construction hours of 8 A.M. to 6 P.M. Project construction noise could impact noise sensitive receptors during construction. However, implementation of **Mitigation Measures NOISE-1** through **NOISE-4** would reduce construction noise and ensure that noise impacts at sensitive receptors would be minimized. Therefore, construction noise impacts would be less than significant.

On-road haul trucks would be used to transport materials to and from the Project construction areas. The trucks would travel past residences along La Cienega Boulevard, Olympic Boulevard, Le Doux Road, Clifton Way, Clark Drive, Dayton Way, Maple Drive, and 3rd Street. The number of passing trucks would be minimal at approximately 8 trucks per day (with 3 trucks during the A.M. or P.M. peak hour is assumed in the analysis). The temporary addition of these minimal number of trucks per day during project construction activities would not contribute to an audible increase in noise levels above the existing noise levels. As previously stated, a doubling of traffic volumes on a roadway is required to increase traffic noise levels by 3 dBA, which is a barely perceptible increase to a healthy human ear. Since the minimal number of trips would not cause a doubling of traffic volumes, the off-site construction traffic noise impacts would be less than significant.

The existing noise environment in the project area is dominated by traffic noise from vehicle traffic on nearby roadways, as well as from other existing noise sources including airport-related noise. As the project is an infrastructure project that involves pipeline replacement, operation of the project would not result in a net increase in operational noise levels along the pipeline route. Furthermore, the well site would be enclosed within a structure and not cause a perceptible change in ambient noise levels. The project would require periodic maintenance activities, which would involve a few trucks or vehicles per month travelling to the well site and different pipeline segments, but would not require any additional employees. However, given the minimal usage of maintenance vehicles at the project site, project operation would not result in a perceptible increase in noise levels. As such, operation of the project would result in a less than significant impact.

Mitigation Measures

NOISE-1: Prior to construction, the City of Beverly Hills shall ensure that the contractor specifications stipulate that:

- All construction equipment, fixed or mobile, is equipped with properly operating and maintained mufflers and other state-required noise attenuation devices capable of up to a 5 dBA reduction.
- When feasible, construction haul routes shall avoid noise-sensitive uses (e.g., residences, convalescent homes).
- During construction, stationary construction equipment shall be placed such that emitted noise is directed away from the nearest noise-sensitive receptors.

- The project shall provide noise blanket/temporary noise barriers rated for up to a 10 dBA reduction between the active areas and surrounding sensitive uses.

NOISE-2: Throughout project construction and operation, the City of Beverly Hills shall document, investigate, evaluate, and attempt to resolve all project-related noise complaints as soon as possible.

- The City shall establish and disseminate a 24/7 hotline telephone number for use by the public to report any undesirable project noise conditions. If the telephone number is not staffed 24 hours per day, the City shall include an automatic answering feature with date and time stamp recording to answer calls when the phone is unattended.
- The City shall designate a Noise Disturbance Coordinator during construction and permanently once the facility is operational. The Noise Disturbance Coordinator shall assist in resolving noise complaints to minimize impacts while maintaining the objectives of the construction and operation of the facility. The Noise Disturbance Coordinator shall report all noise complaints to the City program manager.
- For construction noise complaints received outside of the construction hours and days allowed (Monday through Friday, between the hours of 7:00 a.m. and 8:00 p.m.), the Noise Disturbance Coordinator shall take immediate steps to determine whether project construction is causing the noise and, if so, to reduce the noise level of that activity or take other appropriate action to remedy the complaint as quickly as possible.
- For construction activities near local residences, the Noise Disturbance Coordinator shall have the authority to require the installation of a temporary noise barrier to reduce noise impacts to the closest sensitive receptors. The noise barriers shall be tall enough to effectively block sight-lines of the construction to the closest residences. The contractor shall install noise barriers as directed by the Noise Disturbance Coordinator to minimize construction noise and resolve noise complaints.

NOISE-3: Residents of properties shall be offered noise mitigation measures (e.g., hearing protection, sound-proofing, white noise machines, etc.) acceptable to the residents or temporary relocation for the duration of nearby construction that would generate construction noise levels at their property in excess of 45 dBA, L_{eq} during nighttime hours, for the duration of time that 24-hour activity occurs. Based on the analyses presented in this IS/MND, this measure shall apply to residences located within approximately 200 feet of the well installation location and pipeline rehabilitation and main transmission activity (i.e. residences along or near Chariton Street and La Cienega Boulevard).

NOISE-4: The contractor shall coordinate with any affected schools, institutions of learning, hospitals, or churches regarding construction schedule and the expected level of disturbance. The contractor shall ensure there are no special events or gatherings that would be affected by construction activity before continuing and will notify any affected institution of the anticipated schedule and completion date. In the event of a conflict, the contractor shall limit the use of equipment in an effort to lower noise levels or cease construction completely until the event or gathering has ended.

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

Less than Significant Impact with Mitigation Incorporated. During project construction, the operation of typical heavy construction equipment for demolition, earth-moving, and excavation would generate localized vibration levels, which, depending upon distance, could potentially affect structures or annoy people. Non-typical heavy impact machinery that could result in excessive vibration conditions, such as pile drivers, would not be used.

Vibration analyses are conducted for potential structural damage to buildings, and annoyance to humans in inhabited structures. The closest structures to the construction activities on the project site would be the adjacent residential, commercial, educational, and religious land uses adjacent to the well site and along the path of the pipeline. The closest and most sensitive off-site structures would be residential structures approximately 25 feet from the well site and pipeline alignment.

Construction vibration would have a significant impact if:

- Project construction activities cause groundborne vibration levels to exceed the building damage threshold of 0.2 in/sec PPV at Building Category III Non-engineered timber and masonry buildings (FTA 2018), and
- Project construction activities cause groundborne vibration levels to exceed the human annoyance threshold of 80 VdB at Land Use Category 2 – Residences (FTA 2018).

The vibration levels generated by the general construction equipment that generate the highest vibration levels during the construction of the proposed project are identified in **Table 9, *Vibration Source Levels for Construction Equipment***, in terms of peak particle velocity (PPV), expressed in inches per second (in/sec), and root mean square (RMS) velocity, expressed in VdB. As shown, depending on the type of construction equipment used, vibration velocities could reach as high as approximately 0.089 in/sec PPV at 25 feet from the source (e.g., large bulldozer), which corresponds to a RMS velocity level of 87 VdB at 25 feet from the source.

**TABLE 9
VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT**

| Equipment | Approximate PPV (in/sec) at 25 feet | Approximate RMS (VdB) at 25 feet |
|------------------|--|---|
| Large Bulldozer | 0.089 | 87 |
| Loaded Trucks | 0.076 | 86 |
| Jackhammer | 0.035 | 79 |
| Small Bulldozer | 0.003 | 58 |

As shown in Table 9, operation of a large bulldozer would generate vibration levels that would not structurally impact structures, if operated at approximately 25 feet or greater.

The residences adjacent to the well site and along the pipeline alignment are conservatively considered as non-engineered timber and masonry buildings, and are located at a minimum of 25

feet from the construction activity. Operation of a large bulldozer at 25 feet would not exceed the 0.2 in/sec PPV structural damage threshold for these type of buildings. Therefore, the potential structural damage vibration impact to residential structures from project construction would be less than significant.

In addition to potential structural damage, construction vibration could potentially cause human annoyance at nearby buildings. The vibration impact threshold for human annoyance at a residential structure is 80 VdB. As shown in Table 9, the vibration generated by the operation of a large bulldozer or a loaded haul truck at 25 feet would exceed the human annoyance thresholds of 80 VdB. At 45 feet, the operation of this equipment would not exceed the human annoyance threshold. Therefore, the operation of this equipment at the well site and pipeline would potentially exceed the vibration threshold of human annoyance, resulting in a significant impact.

However, implementation of **Mitigation Measure NOISE-5** would lessen the human annoyance caused by construction vibration and ensure that impacts at sensitive receptors would be minimized. Therefore, construction vibration impacts would be less than significant.

Once construction activities have been completed, there would be no substantial operational sources of vibration activities from the Project site. The primary sources of transient vibration would include well pumps and employee vehicle circulation during maintenance, which also produce limited levels of vibration. These sources would generate substantially lower levels of vibration identified above for construction. Ground-borne vibration generated by each of the abovementioned activities would generate approximately up to 0.005 in/sec PPV adjacent to the project site (FTA 2018). Therefore, vibration impacts during Project operation would not result in substantial adverse environmental impacts.

Mitigation Measure

NOISE-5: The operation of construction equipment that generates high levels of vibration, such as large bulldozers and loaded trucks, shall be prohibited within 45 feet of existing residential structures. Instead, small construction equipment such as small rubber tired bulldozers, small rubber tired excavator, etc., not exceeding 150 horsepower shall be used within this area during demolition, grading, and excavation operations.

- c) **For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

No Impact. The project site is not located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport. The project site is located approximately 4 miles from the Santa Monica Airport, which has an airport land use commission plan that identifies its airport influence area including noise contours, and that the Project is not located within (Los Angeles County 2003). Therefore, the project would not have the potential to expose people to significant aircraft-generated noise. No impact would occur.

References

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-

4.14 Population and Housing

| <i>Issues (and Supporting Information Sources):</i> | <i>Potentially Significant Impact</i> | <i>Less Than Significant with Mitigation Incorporated</i> | <i>Less-Than-Significant Impact</i> | <i>No Impact</i> |
|---|---------------------------------------|---|-------------------------------------|-------------------------------------|
| 14. POPULATION AND HOUSING — Would the project: | | | | |
| a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Environmental Evaluation

Would the Project:

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

Less than Significant Impact. The proposed project does not include construction of new homes or businesses that would result in a direct increase in population or create a substantial number of jobs. Construction activities would require temporary employment. The maximum number of construction workers at the project site at once would be 28 workers and these opportunities are expected to be filled by workers within the local economy. In May 2019, there was an unemployment average of 4.5 percent, with a County-wide increase of 6.4 percent in construction specifically from 2018 to 2019 (EDD 2019). Given that there was an average of 144,700 persons within the County involved in construction activities, specifically, it is reasonable to assume that there are available workers for the construction activities associated with the proposed project over the 13-month period. Because the majority of the work force is located in the County which is highly populated, there would be an adequate number of local workers that could be available for construction jobs and could commute to the temporary construction jobs rather than relocate and induce growth in the area.

The proposed project is designed to allow the City to continue to provide water services in its service area and to meet forecasted demand and growth in the service area. The proposed project's expansion of water supply is consistent with development anticipated by the City's Urban Water Management Plan, the Southern California Association of Governments (SCAG), the City of Beverly Hills General Plan, and expected population growth. The City has prepared CEQA documentation evaluating potential impacts of growth that could result from implementation of their General Plan. By providing public services to meet population expectations, the City lessens impacts to public services that could result from implementation of land use policies. Localizing water supply in order to provide water supply reliability and public health would occur irrespective of growth rates in the service area.

The project area is substantially developed and would continue to provide water services in an area with similar facilities and services. The project would not be implemented within a

greenfield or undeveloped area where a project such as the proposed would introduce new water services, which could promote growth. Therefore, the implementation of the proposed project would result in less than significant impacts related to indirect inducement of population growth.

Further, operation of the proposed well and transmission main would not require any new City employees. Therefore, implementation of the proposed project would not directly induce substantial population growth in the City's service area. Therefore, the project would result in less than significant impacts to population growth.

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

No Impact. Although there is one existing residence on the Well Site that would be demolished, this structure is not currently being used to house people, nor has it been used as a residence recently. Therefore, the proposed project would not displace people or housing necessitating the construction of replacement housing elsewhere. There would be no impact.

References

Employment Development Department (EDD), 2019. Los Angeles- Long Beach- Glendale Metropolitan Division (LA County). Available online at:
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4.15 Public Services

| <i>Issues (and Supporting Information Sources):</i> | <i>Potentially Significant Impact</i> | <i>Less Than Significant with Mitigation Incorporated</i> | <i>Less-Than-Significant Impact</i> | <i>No Impact</i> |
|--|---------------------------------------|---|-------------------------------------|-------------------------------------|
| 15. PUBLIC SERVICES — Would the project: | | | | |
| a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered government 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 following public services: | | | | |
| i) Fire protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ii) Police protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| iii) Schools? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| iv) Parks? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| v) Other public facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Environmental Evaluation

Would the Project:

- a) **Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered government 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 following public services:**

- i) **Fire protection?**

No Impact. Fire services for the City of Los Angeles and the City of Beverly Hills are provided by the Los Angeles Fire Department (LAFD) and the Beverly Hills Fire Department (BHFD), respectively. The LAFD and the BHFD provide the primary response for fire suppression and emergency medical services to the project area (LAFD 2019a; City of Beverly Hills 2019a). The nearest station to the project area is LAFD Station 58, located at 1556 South Robertson Boulevard in Los Angeles (LAFD 2019b). The City's Fire department is located at 445 North Rexford Drive (City of Beverly Hills 2019a) The proposed project would not change existing demand for fire protection services because operation would not result in an increase of onsite employees or population. Further, the proposed well facilities and transmission main would not introduce structures or ancillary facilities that increase fire susceptibility as compared to existing structures within the project area. Therefore, the proposed project would not increase the need for new fire department staff or new facilities and no impacts would occur.

ii) Police protection?

No Impact. The City of Los Angeles and the City of Beverly Hills are provided with police protection services by the Los Angeles Police Department (LAPD) and the City of Beverly Hills Police Department (BHPD), respectively (LAFD 2019; City of Beverly Hills 2019b). The proposed project does not include new homes or businesses that would require any additional services or extended response times for police protection services beyond those required with the existing on-site uses. Therefore, the City would not be required to expand or construct new police stations to serve the proposed project. No impacts would occur with the proposed project because additional police protection facilities would not be needed.

iii) Schools?

No Impact. The project area lies within the Los Angeles Unified School District (LAUSD) and Beverly Hills Unified School District (BHUSD) service areas (LAUSD 2019; BHUSD, 2019). The student generation rates within LAUSD and other private schools within the project area would not be affected or altered by the implementation of the proposed project. The proposed project would not affect local school enrollment. No school facilities would be impacted by the proposed project or be required to be constructed.

iv) Parks?

No Impact. The proposed project would not interfere with or have adverse impacts on parks (refer to Figure 6). The proposed project would not involve new housing or employment opportunities that would prompt the need for new parks. A portion of the proposed transmission main would travel adjacent to La Cienega Park; however, construction and operation of the proposed project would not impact the use of nearby recreational uses.

v) Other public facilities?

No Impact. The proposed project would not introduce inhabitants to the project area that would require additional public facilities. No impacts would occur with the proposed project because public facilities would not be needed.

References

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4.16 Recreation

| <i>Issues (and Supporting Information Sources):</i> | <i>Potentially Significant Impact</i> | <i>Less Than Significant with Mitigation Incorporated</i> | <i>Less-Than-Significant Impact</i> | <i>No Impact</i> |
|--|---------------------------------------|---|-------------------------------------|-------------------------------------|
| 16. RECREATION: | | | | |
| a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Environmental Evaluation

Would the Project:

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

No Impact. The City of Los Angeles and City of Beverly Hills maintain the local parks and provide recreational services for the project area. The nearest recreational facilities located adjacent to the project area are Beverly Gardens Park, La Cienega Park, Frank Fenton Field, Arnaz Park, Hamel Mini Park, and Rexford Mini Park (Figure 6). The proposed project would not directly introduce new residents within the project area. Therefore, the proposed project would not increase the use of these existing recreational facilities within the project area and would result in no impact to the physical deterioration of recreational facilities.

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

No Impact. The implementation of the proposed project would not require recreational facilities to serve the project. Therefore, the proposed project would not result in an adverse physical effect on the environment from the construction or expansion of additional recreational facilities because the proposed project would not require recreational facilities. (For additional discussion of temporary impacts to recreational facilities, refer to Section 4.15 Public Services, Question 4.15(a)(iv).)

4.17 Transportation

| <i>Issues (and Supporting Information Sources):</i> | <i>Potentially Significant Impact</i> | <i>Less Than Significant with Mitigation Incorporated</i> | <i>Less-Than-Significant Impact</i> | <i>No Impact</i> |
|--|---------------------------------------|---|-------------------------------------|-------------------------------------|
| 17. TRANSPORTATION — Would the project: | | | | |
| a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Would the project conflict with or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Result in inadequate emergency access? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Environmental Evaluation

Would the Project:

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

Less than Significant with Mitigation Incorporated. The project proposed would install a well, pump-to-waste Stormdrain line within Chariton Street adjacent to the Well Site, and a transmission main. The Well Site would be located at 1956 Chariton Street. The proposed transmission main would be approximately four miles long. The proposed rehabilitation portion of the transmission main (existing inactive 18 and 24-inch pipelines) are shown on Figure 2. Construction equipment, vehicles, personnel, and materials staging areas would be located onsite at the Well Site, within adjacent City-owned property, or immediately adjacent to the transmission main construction areas along streets/roadways, where such areas can be accommodated.

There are no bicycle facilities within the project area along the local roadways such as Chariton Street and La Cienega. Transit services in the cities of Los Angeles and Beverly Hills are provided by the Los Angeles County Metropolitan Transportation Authority (Metro) (Metro 2019). There are many transit locations and opportunities for bus services within the project area. The closest bus stop is located at the intersection of La Cienega and Guthrie, which runs along Route 105 in the northern/southward direction.

Construction of the proposed project is anticipated to occur over approximately 13 months, at night and throughout the day. All daytime construction would occur during typical construction hours ranging between 7:00 a.m. to 7:00 p.m., Monday through Friday except on federal holidays. Nighttime construction would be required for 24-hour drilling and testing of the proposed well. Nighttime construction would also take place along various areas of La Cienega for the transmission main rehabilitation, connection and new pipeline construction. Nighttime construction of the transmission main is proposed in order to avoid traffic congestion/interferences as much as possible. Nighttime construction would only occur in various

areas along La Cienega where nighttime construction is permitted due to being located within a commercial area. Nighttime construction would require approval from the City of Los Angeles. Construction activities, scheduling, and number of workers could overlap between the construction of the well, associated storm drain (pump-to-waste) and the transmission main. Construction truck and vehicle trips would be generated primarily by construction workers commuting to and from the work sites, and by trucks hauling materials and equipment to and from the well and transmission main sites. Construction trucks and vehicles would use the regional circulation system, as well as the main roadways within the cities of Los Angeles and Beverly Hills. Based on the designated construction truck routes established in the cities' General Plans, construction trucks would primarily use La Cienega Boulevard, Sawtelle Boulevard, Venice Boulevard, Sepulveda Boulevard, Manchester, Adams, Olympic Boulevard, 3rd Street, and Santa Monica Boulevard to bring construction materials and construction workers to the project area (City of Los Angeles 2016; City of Beverly Hills 2010).

While construction of the proposed project would temporarily generate additional truck and vehicle trips within the cities and the regional circulation system of Los Angeles County, traffic levels would not substantially increase and would be temporary in nature, as traffic levels would return to pre-construction conditions once construction is complete. Additionally, while local drivers could experience increased travel times if they were traveling behind a heavy truck due to slower movement and turning radii compared to passenger vehicles, these delays would be intermittent throughout the day and would cease once construction activities are completed.

However, while construction of the proposed project would not significantly increase the amount of trucks and vehicles on the local and regional circulation systems, construction activities within roadways could require partial closure of traffic lanes, which could significantly impact the performance of applicable roadways and public transportation. In order to reduce impacts to roadway performance during construction of the proposed transmission main and storm drain pipelines, the City would be required to implement **Mitigation Measure TR-1**, which would require the preparation and implementation of a Traffic Control Plan. The Traffic Control Plan would include, but not be limited to, signage, striping, delineated detours, flagging operations, changeable message signs, delineators, arrow boards, and K-Rails that would be used during construction to guide motorists, bicyclists, and pedestrians safely through the construction area and allow for adequate access and circulation to the satisfaction of the City of Los Angeles and City of Beverly Hills. The traffic control plan for the proposed project would be coordinated with Los Angeles County and Metro when construction activities affect roadways and public transit under its jurisdiction. Therefore, with implementation of Mitigation Measure TR-1, impacts to the City of Los Angeles, City Beverly Hills, and regional circulation systems during construction of the proposed project would be reduced to less than significant levels.

Once constructed, the proposed transmission main and storm drains (pump-to-waste for the Well Site) would be contained entirely underground and would require minimal maintenance. In addition, all associated aboveground well facilities would require minimal maintenance infrequently, which could generate a few vehicle trips annually. However, the amount of trips generated by operation and maintenance would result in a negligible increase to existing traffic volumes and would be sporadic. Furthermore, the proposed project would not alter the local

roadway configuration or permanently disrupt bus stops or bike lanes once operational, and therefore would be consistent with all applicable transportation and traffic plans. Thus, operation of the proposed project would not affect the performance of the local or regional circulation systems. Operational impacts would be less than significant.

Mitigation Measures

TR-1: Prior to the start of construction of the project, the City shall require the construction contractor to prepare a Traffic Control Plan. The Traffic Control Plan will be separated into two different sections: the first section being for construction management within the Well Site and surrounding local roadways; and second, for construction management in areas located along the proposed transmission main rehabilitation areas and proposed new transmission main areas.

The Traffic Control Plan will show all signage, striping, delineated detours, flagging operations and any other devices that will be used during construction to guide motorists, bicyclists, and pedestrians safely through the construction area and allow for adequate access and circulation to the satisfaction of the City of Los Angeles, City of Beverly Hills and Los Angeles County, as applicable. The Traffic Control Plan shall be prepared in accordance with the City of Los Angeles and the City of Beverly Hills' traffic control guidelines and will be prepared to ensure that access will be maintained to individual properties, that emergency access will not be restricted, and that public transit will not be significantly disrupted. The Traffic Control Plan will ensure that written notices are provided to affected property owners and that detours or alternative routes are provided for public transit, bicyclists using on-street bicycle lanes, and pedestrians using adjacent sidewalks.

b) Would the project conflict with or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?

No Impact. "Vehicle miles traveled" refers to the amount and distance of automobile travel attributed to a project. An average of 20 construction personnel would be required at the well and transmission main sites within one day. Eight additional workers could potentially be required to haul materials to and from the project sites. This would mean that a maximum of 28 construction workers, in total, would be driving to and from project sites for various construction activities. However, it is very unlikely that 28 workers would be utilizing vehicles during one day. Further, construction workers would be taken from the existing labor pool and therefore, would be driving in from local areas within the County. These trips would be temporary over the approximate 13-month construction period, and would not result in any perceivable increase in vehicle miles traveled that would exceed a City or County threshold of significance.

Further, there are no new permanent vehicle trips associated with the implementation of the proposed project once operational. The well and transmission main may require periodic maintenance. However, maintenance activities would be similar in nature to other maintenance currently being performed at existing City facilities. City staff would be traveling from local existing facilities such as the Foothill WTP. Therefore, maintenance activities would not occur frequently enough as to contribute to a significant increase of vehicle miles traveled throughout

the project area. As a result, the proposed project would be consistent with CEQA Guidelines section 15064.3 subdivision (b), and no impacts would occur.

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

Less than Significant with Mitigation Incorporated. The proposed project includes construction of well facilities and a transmission main within the City of Los Angeles and City of Beverly Hills. The proposed project does not include the construction of a new roadway or intersection, which could be determined to be a hazardous design feature.

Construction of the proposed project would include the use of heavy trucks to bring construction materials to and from the project area. While local drivers could experience temporary congestion due to construction vehicles, delays would be intermittent throughout the day and would cease once construction activities are completed. Construction of the facilities included under the proposed project may require partial road closures, which could result in hazardous driving conditions. However, implementation of Mitigation Measure TR-1 would require the preparation and implementation of a Traffic Control Plan to minimize the effects on roadway safety. Therefore, construction of the proposed project would not result in a hazardous design feature within the project area. Impacts during construction would be less than significant with mitigation.

Operation of the proposed project would require periodic maintenance checks and activities within the cities. City staff would perform routine operations similar to what occurs along other pipelines and well facilities in the project vicinity. Further, operation of the proposed project would not require heavy equipment nor would it impact existing intersections or roadways and as such would not result in a hazardous design feature. Impacts during operation of the proposed project would be less than significant.

d) Result in inadequate emergency access?

Less than Significant with Mitigation Incorporated. Construction of the proposed project would not substantially increase traffic levels or travel times on the surrounding circulation systems. Construction trips would be generated by trucks bringing materials to and from the construction sites and daily construction worker vehicle trips. However, while construction of the proposed project would not significantly increase the amount of trucks and vehicles on the local and regional circulation systems, construction activities within roadways would require partial road closures, which could interfere with emergency access. In order to reduce impacts to emergency access during construction of the proposed project, the City would be required to implement Mitigation Measure TR-1, which would require the preparation and implementation of a Traffic Control Plan. The Traffic Control Plan would include, but not limited to, signage, striping, delineated detours, flagging operations, changeable message signs, delineators, arrow boards, and K-Rails that will be used during construction to guide motorists, bicyclists, and pedestrians safely through the construction area and allow for adequate emergency access and circulation to the satisfaction of the City of Los Angeles and the City of Beverly Hills. The Traffic Control would be coordinated with Los Angeles County and Metro, as necessary, as well

as with emergency responders, which include fire departments, police departments, and ambulances that have jurisdiction within the project area. Therefore, with implementation of Mitigation Measure TR-1, in conjunction with Mitigation Measure HAZ-3, impacts to emergency access during construction of the proposed project would be reduced to less than significant.

Once constructed, the transmission main would be contained entirely underground and the well would be located within City property. These facilities would not interfere with emergency access. The proposed project facilities would require periodic maintenance, which could generate a few vehicle trips annually. The proposed well may need reconditioning which would take place every three to four years which will take approximately three to four days and include one to two vehicles for pump removal and well redevelopment. However, due to the relatively limited amount of vehicle trips associated with operation and maintenance of the proposed project facilities, these trips would not interfere with emergency access. Impacts to emergency access during operation would be less than significant.

References

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Metro, 2019. About Metro. Available online at: <https://www.metro.net/>, accessed June 2019.

4.18 Tribal Cultural Resources

| <i>Issues (and Supporting Information Sources):</i> | <i>Potentially Significant Impact</i> | <i>Less Than Significant with Mitigation Incorporated</i> | <i>Less-Than-Significant Impact</i> | <i>No Impact</i> |
|--|---------------------------------------|---|-------------------------------------|--------------------------|
| 18. Tribal Cultural Resources — | | | | |
| Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: | | | | |
| a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Environmental Evaluation

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

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

Less Than Significant with Mitigation Incorporated. Assembly Bill 52 (AB 52), signed into law on September 25, 2014, requires lead agencies to evaluate a project's potential to impact Tribal cultural resources and establishes a formal consultation process for California Native American Tribes as part of CEQA. Tribal cultural resource includes sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are eligible for inclusion in the California Register or included in a local register of historical resources. AB 52 also gives lead agencies the discretion to determine, supported by substantial evidence, whether a resource qualifies as a Tribal cultural resource. Consultation is required upon request by a California Native American tribe that has previously requested that the City provide it with notice of such projects, and that is traditionally and culturally affiliated with the geographic area of a proposed project.

The analysis of impacts to Tribal cultural resources is based on the consultation between the City and the Tribes, information provided by the Tribes, and the *Cultural Resources Assessment Report* (Appendix C). The potential for the project area to contain Tribal cultural resources was assessed based on information provided by Tribes and supplemented by the findings of the cultural resource records search (i.e., presence and proximity of known resources), the SLF search, land use history research, subsurface geological conditions, and the proposed excavation

parameters for the Project. The NAHC was contacted on April 10, 2019 to request a search of the SLF.

The City commenced tribal notification in accordance with AB 52 on June 21, 2019, via a mailing to all of the surrounding tribes on the City's AB 52 notification list. One tribe has commented on the request. The Gabrieleño Band of Mission Indians – Kizh Nation engaged in consultation, and in a consultation phone call with City on August 22, 2019 the Tribe expressed their concerns regarding the proposed project. While the Tribe did not provide locations of any known tribal cultural resources within the project site, they expressed concern for the sensitivity of the area and the possibility of unforeseen and inadvertent discovery of Tribal cultural resources. The tribe requested monitoring, and this monitoring is included in Section 4.5, *Cultural Resources* mitigation above. The Tribe concurred with this approach and consultation was closed on September 18, 2019. To ensure the proposed project would not result in a potentially significant impact, in the event that objects or artifacts that may be Tribal cultural resources are encountered during the course of any ground-disturbance activities, all such activities would temporarily cease on the specific project site until the potential Tribal cultural resource(s) is properly assessed following specific protocol required by the Los Angeles Department of City Planning. Therefore, impacts would be less than significant with implementation of cultural mitigation measures.

Mitigation Measures

Implement Mitigation Measures CUL-1 through CUL-5.

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

Less than Significant with Mitigation Incorporated. Under AB 52, if a lead agency determines that a project may cause a substantial adverse change to a Tribal cultural resource, the lead agency must consider measures to mitigate that impact. PRC Section 21074 provides a definition of a Tribal cultural resource. In brief, in order to be considered a Tribal cultural resource, a resource must be either: 1) listed, or determined to be eligible for listing, on the national, State, or local register of historic resources, or 2) a resource that the lead agency chooses, in its discretion supported by substantial evidence, to treat as a Tribal cultural resource. In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the State register of historic resources or City Designated Cultural Resource. In applying those criteria, a lead agency shall consider the value of the resource to the tribe.

As discussed above, the City provided notice to tribes soliciting requests for consultation on June 21, 2019. So as to ensure any unforeseen and inadvertent discovery of Tribal cultural resources would not result in a potentially significant impact, in the event that objects or artifacts that may be Tribal cultural resources are encountered during the course of any ground-disturbance activities, all such activities would temporarily cease on the specific project site until the potential

Tribal cultural resource(s) is properly assessed following specific protocol required by the Los Angeles Department of City Planning. Therefore, impacts would be less than significant with implementation of cultural mitigation measures.

Mitigation Measures

Implement Mitigation Measures CUL-1 through CUL-5.

4.19 Utilities and Service Systems

| <i>Issues (and Supporting Information Sources):</i> | <i>Potentially Significant Impact</i> | <i>Less Than Significant with Mitigation Incorporated</i> | <i>Less-Than-Significant Impact</i> | <i>No Impact</i> |
|---|---------------------------------------|---|-------------------------------------|-------------------------------------|
| 19. UTILITIES AND SERVICE SYSTEMS — Would the project: | | | | |
| a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications, the construction of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Environmental Evaluation

Would the Project:

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

No Impact. The proposed project may require a limited use of potable water during construction activities. Water required for potential dust suppression would be obtained from a support truck. New water facilities or expansion of existing facilities would not be required to support this use. Additionally, the proposed project would not require new electric power, natural gas, or telecommunications facilities.

The existing Foothill WTP is currently sized to accommodate increased flows from well implementation. Implementation of the proposed project would not require the WTP to update RO and other treatment facilities. Further, the proposed project would not substantially alter the local drainage pattern of the proposed Well Site. During operation of the proposed project, the project facilities themselves would not generate wastewater, and therefore would not exceed wastewater treatment requirements. In addition, surface water generated by storms or by construction activities would be collected by the onsite well drainage systems and directed to the storm drain. Compliance with the permit conditions would ensure that all RWQCB requirements would not be exceeded. Therefore, the implementation of the proposed project would not require

new or expanded wastewater treatment facilities or stormwater drainage systems. No impacts would occur.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less than Significant Impact. Water needs of the project during construction would be relatively minor and temporary. Water could be used for various construction related activities, such as dust suppression. After construction, the proposed project would not include uses that would increase the demand for water. Overall water use is not expected to change as a result of this project. The proposed project would have sufficient water supplies available from the City and less than significant impacts would occur.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

No Impact. The proposed project would result in the generation of wastewater associated with temporary use of portable toilets. During project implementation, the City or the contractor may have portable toilet facilities available onsite temporarily for use by construction workers. Given the relatively small construction workforce of an average of 8 and up to a maximum of 28 workers onsite daily for the 13-month construction period, this amount of waste would be minimal. Once the construction phase is over, such portable facilities would be removed and the wastewater properly handled and disposed in accordance with all applicable laws and regulations.

As discussed above, operation of the proposed project would not generate any wastewater. The City would not be required to provide future capacity as a result of proposed project implementation. The proposed project has adequate capacity to serve current treatment demands. Therefore, the proposed project does not require a wastewater treatment provider to serve the project. No impacts would occur.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less than Significant Impact. Construction and implementation of the proposed project is not anticipated to generate a significant amount of solid waste. The construction contractor would be required to dispose of excavated soil and solid wastes in accordance with local solid waste disposal requirements. Construction of the proposed project would result in the removal of approximately 200 cubic yards of material during demolition of the three existing structures. The generation of material from proposed project implementation is considered minimal compared to the remaining capacity at the nearest landfill which is the 365 Disposal & Recycling Landfill. The 365 Disposal & Recycling Landfill is located at 11153 Tuxford Street, Sun Valley, CA 91352. The landfill is permitted to accept up to 15 tons per day and processes and transfers solid waste for recycling or to other local landfills (CalRecycle 2019). Because the proposed project would only generate construction waste temporarily and no long-term waste would be generated, the

implementation of the proposed project would result in less than significant impacts on daily permitted capacity of the 365 Disposal & Recycling Landfill. Further, the project would not impair attainment of solid waste reduction goals.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

No Impact. The proposed project would comply with all federal, State, and local statutes and regulations related to solid waste, including the California Integrated Waste Management Act and City of Los Angeles and City of Beverly Hills requirements for solid waste generated during the construction process. No impacts would occur.

References

CalRecycle, 2019. SWIS Facility Detail, 365 Disposal and Recycling Inc (19-AR-1264).
Available online at: <https://www2.calrecycle.ca.gov/swfacilities/Directory/19-AR-1264/>,
accessed June 2019.

4.20 Wildfire

| <i>Issues (and Supporting Information Sources):</i> | <i>Potentially Significant Impact</i> | <i>Less Than Significant with Mitigation Incorporated</i> | <i>Less Than Significant Impact</i> | <i>No Impact</i> |
|--|---------------------------------------|---|-------------------------------------|-------------------------------------|
| 20. Wildfire—If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project: | | | | |
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risk, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Environmental Evaluation

Would the Project:

- a) **Substantially impair an adopted emergency response plan or emergency evacuation plan?**

Less than Significant with Mitigation Incorporated. As discussed in response to Question 4.9(f), *Hazards and Hazardous Materials*, implementation of the proposed project is not anticipated to substantially impair an adopted emergency response plan or evacuation plan with implementation of Mitigation Measures HAZ-3 and TR-1. Construction activities would not significantly interfere with emergency response access to the project vicinity. Impacts would be less than significant with mitigation.

Mitigation Measures

Implement Mitigation Measures HAZ-3 and TR-1.

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

No Impact. As discussed in response to Question 4.9(g), *Hazards and Hazardous Materials*, the project area is fully developed with pavement and facilities, and is not located within a fire safety hazard zone. Further, the project area is not located within a valley or somewhere susceptible to prevailing winds, and the project area is flat and does not contain slopes. Therefore, implementation of the proposed project would not construct or operate facilities within an area vulnerable to wildland fires, and would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire. No impacts would occur.

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

No Impact. The proposed project would not result in the installation of permanent roads, fuel breaks, emergency water sources or new power lines. Construction activities of new well facilities include various piping and electrical controls that may require maintenance. However, as described previously, the project facilities would be implemented within a developed area and not within a fire hazard safety zone. Therefore, implementation of utilities within the already developed properties, would not result in temporary or ongoing impacts to the environment.

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

No Impact. As discussed in Sections 4.7(a)(iv), 4.7(c), 4.10(c)(ii), and 4.10(c)(i), the project would not result in increased drainage or runoff that could contribute to landslide or flooding impacts. No impact would occur.

4.21 Mandatory Findings of Significance

| <i>Issues (and Supporting Information Sources):</i> | <i>Potentially Significant Impact</i> | <i>Less Than Significant with Mitigation Incorporated</i> | <i>Less-Than-Significant Impact</i> | <i>No Impact</i> |
|--|---------------------------------------|---|-------------------------------------|--------------------------|
| 21. MANDATORY FINDINGS OF SIGNIFICANCE — | | | | |
| a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Does the project have impacts that are individually limited but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Environmental Evaluation

Would the Project:

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

Less than Significant with Mitigation Incorporated. As discussed in Section 4.4 *Biological Resources*, the project activities have the potential to interfere with nesting birds in nearby mature trees within the project area. Although impacts would be temporary, interfering with nesting birds during the breeding season is considered a potentially significant impact. Implementation of Mitigation Measure BIO-1, would reduce potential impacts to a less than significant level.

Furthermore, as discussed in Section 4.5 *Cultural Resources*, while there are known cultural resources within the project area, construction of the proposed project would not result in direct or indirect impacts to those known resources. However, construction of the proposed project could potentially encounter unknown archaeological, paleontological resources or human remains. With implementation of Mitigation Measures CUL-1 through CUL-5 and GEO-1 through GEO-4, impacts would be reduced to a less than significant level. Once constructed, operation of the proposed project would have no long-term permanent impacts to biological or cultural resources.

Mitigation Measures

Implement Mitigation Measures BIO-1, CUL-1 through CUL-5, and GEO-1 through GEO-4.

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

Less than Significant with Mitigation Incorporated. A cumulative impact could occur if the proposed project would result in an incrementally considerable contribution to a significant cumulative impact in consideration of past, present, and reasonably foreseeable future projects for each resource area. No direct significant impacts were identified for the proposed project that could not be mitigated to a less than significant level. However, when combined with other projects within the vicinity, the proposed project may result in a contribution to a potentially significant cumulative impact.

The proposed project does not include any agricultural or forestry resources, or mineral resources that could be impacted and the proposed project and would have no effect on land use and planning, population and housing, public services or recreation. In addition, impacts would be less than significant for aesthetics, air quality, energy, GHG emissions, hydrology and water quality, and utilities. As a result, cumulative impacts related to these resources would be less than significant.

Potential impacts to biological resources, cultural resources, and paleontological resources (geology, soils, and seismicity), hazards and hazardous materials, noise, transportation, tribal cultural resources, and wildfire would only occur during construction of the project. These potential construction impacts would be short term and occur over a 13-month period. The construction impacts for the proposed project are limited in nature and scope to the project area in and around the cities of Los Angeles and Beverly Hills. The project work itself will largely occur within the Well Site and along public roadways and will be contained such that off-site impacts do not occur. As a result, the impacts of the proposed project would not combine together with other related projects in the vicinity to produce a significant environmental impact. Furthermore, the operation of the proposed production well and transmission main would not result in any potential impacts to resources. Therefore, operation of the proposed project would not contribute to long-term cumulative impacts and their contribution to impacts would be less than cumulatively considerable.

With implementation of mitigation measures, which aim to reduce project impacts to neighboring sensitive receptors and to sensitive natural resources, impacts related to biological resources, cultural resources, and paleontological resources (geology, soils, and seismicity), hazards and hazardous materials, noise, transportation, tribal cultural resources, and wildfire risks would be less than cumulatively considerable. Therefore, the proposed project would not result in any impacts that would be cumulatively considerable resulting from the proposed project. Cumulative impacts would be considered less than significant with implementation of mitigation.

Mitigation Measures

Implement all mitigation measures contained within this Draft IS/MND (Section 4).

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

Less than Significant Impact with Mitigation Incorporated. The proposed project would not result in substantial adverse effects, either direct or indirect, on human beings. The project would provide the City of Beverly Hills with groundwater that would localize their water supply. As described in Section 4.3 *Air Quality*, air emissions associated with the proposed project would not result in adverse health effects to sensitive receptors. As described in Section 4.13 *Noise*, construction noise also would not result in adverse effects to sensitive receptors with implementation of Mitigation Measures NOISE-1 through NOISE-5. Impacts to human beings would be less than significant with mitigation.

Mitigation Measures

Implement Mitigation Measures NOISE-1 through NOISE-5.