

The Metropolitan Water District of Southern California

Agenda

The mission of the Metropolitan Water District of Southern California is to provide its service area with adequate and reliable supplies of high-quality water to meet present and future needs in an environmentally and economically responsible way.

Board of Directors - Final - Revised 2

October 12, 2021

12:00 PM

Tuesday, October 12, 2021 Meeting Schedule
09:00 am - L&C 10:00 am - RP&AM 11:00 am - Adj Exec 11:30 am - Break 12:00 pm - Board

Agendas, live streaming, meeting schedules, and other board materials are available here: <https://mwdh2o.legistar.com/Calendar.aspx>. If you have technical difficulties with the live streaming page, a listen-only phone line is available at 1-877-853-5257; enter meeting ID: 891 1613 4145. Members of the public may present their comments to the Board on matters within their jurisdiction as listed on the agenda via in-person or teleconference. To participate via teleconference 1-833-548-0276 and enter meeting ID: 815 2066 4276 or click <https://us06web.zoom.us/j/81520664276pwd=a1RTQWh6V3h3ckFhNmDsUWpKR1c2Zz09>

MWD Headquarters Building • 700 N. Alameda Street • Los Angeles, CA 90012

1. Call to Order

- 1.1 Invocation: Stephanie Ann Salgado, Administrative Assistant III, Water System Operations Group
- 1.2 Pledge of Allegiance: Director Tamaribuchi, Municipal Water District of Orange County

2. Roll Call

3. Determination of a Quorum

4. Opportunity for members of the public to address the Board on matters within the Board's jurisdiction. (As required by Gov. Code § 54954.3(a))

5. OTHER MATTERS AND REPORTS

- A. Report on Directors' events attended at Metropolitan expense

[21-512](#)

Attachments: [10122021 BOD 5A Report](#)

- B. Chairwoman's Monthly Activity Report [Item Added 10/5/2021] [21-557](#)
Attachments: [10122021 BOD 5B Report](#)
- C. General Manager's summary of activities [21-513](#)
Attachments: [10122021 BOD 5C Report.pdf](#)
- D. General Counsel's summary of activities [21-514](#)
Attachments: [10122021 BOD 5D Report - Revised](#)
- E. General Auditor's summary of activities [21-515](#)
Attachments: [10122021 BOD 5E Report](#)
- F. Ethics Officer's summary of activities [21-516](#)
Attachments: [10122021 BOD 5F Report](#)
- G. Presentation of Commendatory Resolution honoring Jeff Kightlinger for his service and leadership during his term as General Manager of The Metropolitan Water District of Southern California [21-511](#)

**** CONSENT CALENDAR OTHER ITEMS -- ACTION ****

6. CONSENT CALENDAR OTHER ITEMS - ACTION

- A. Approval of the Minutes of the Meeting for September 14, 2021 and the Special Board Meeting for September 28, 2021 (Copies have been submitted to each Director) Any additions, corrections, or omissions [Special BOD Minutes Added 10/6/2021] [21-541](#)
Attachments: [BOD Sept 14 Approved Minutes](#)
[Sp. BOD Sept 28 Approved Minutes](#)

- B.** Adopt resolution to continue remote teleconference meetings pursuant to the Brown Act Section 54953(e) for meetings of Metropolitan's legislative bodies for a period of 30 days; the General Manager has determined that the proposed action is exempt or otherwise not subject to CEQA **[21-555](#)**

Attachments: [10122021 BOD 6B Resolution Subsequent Adoption October Board Meeting.pdf](#)
[Resolution 9287](#)

- C.** Approve Committee Assignments

7. CONSENT CALENDAR ITEMS - ACTION

- 7-1** Approve the nomination and naming of the overlook at Lake Mathews in honor of former Metropolitan Director Donald "Don" Galleano; the General Manager has determined that this action is exempt or otherwise not subject to CEQA (FNA) **[21-404](#)**

Attachments: [10122021 FNA 7-1 B-L.pdf](#)
[09142021 FNA 7-1 Presentation.pdf](#)

- 7-2** Award a \$3,815,000 contract to Creative Home dba Chi Construction to replace the wastewater system at the Lake Mathews facility; the proposed action is in furtherance of a project that was previously determined to be exempt or otherwise not subject to CEQA (EO) **[21-480](#)**

Attachments: [10122021 EO 7-2 B-L.pdf](#)
[10122021 EO 7-2 Presentation.pdf](#)

- 7-3** Authorize an agreement with Helix Environmental Planning, Inc., in an amount not to exceed \$2.8 million, to prepare environmental documentation for the Regional Recycled Water Program and an agreement with Stantec Consulting Services Inc., in an amount not to exceed \$6.5 million for engineering and technical studies to support the environmental planning phase of the Program; the General Manager has determined that the proposed action is not subject to CEQA (EO) **[21-481](#)**

Attachments: [10122021 EO 7-3 B-L.pdf](#)
[10122021 EO 7-3 Presentation.pdf](#)

- 7-4** Award a \$282,390 contract to AME Builders, Inc. for replacement of the roof on the Vehicle Maintenance and Warehouse Building at the Jensen Water Treatment Plant; the General Manager has determined that the proposed action is exempt or otherwise not subject to CEQA (EO) **21-482**

Attachments: [10122021 EO 7-4 B-L.pdf](#)
[10122021 EO 7-4 Presentation.pdf](#)

- 7-5** Authorize the General Manager to enter into an agreement with the Arizona Department of Water Resources and the Central Arizona Water Conservation District to support the development of the Regional Recycled Water Program; the General Manager has determined that the proposed action is exempt or otherwise not subject to CEQA (EO) **21-489**

Attachments: [10122021 EO 7-5 B-L.pdf](#)
[10122021 EO 7-5 Presentation.pdf](#)

- 7-6** Authorize the General Manager to seek legislation for Metropolitan to utilize alternative project delivery methods for construction of the Regional Recycled Water Program and drought-related projects; the General Manager has determined that the proposed action is exempt or otherwise not subject to CEQA (CL) **21-484**

Attachments: [10122021 CL 7-6 B-L.pdf](#)
[10122021 CL 7-6 Presentation.pdf](#)

- 7-7** Approve the Metropolitan Water District of Southern California's salary schedules pursuant to CalPERS regulations; the General Manager has determined that the proposed action is exempt or otherwise not subject to CEQA (OPT) **21-485**

Attachments: [10122021 OPT 7-7 B-L.pdf](#)
[10122021 OPT 7-7 Presentation.pdf](#)

- 7-8** Adopt framework for amending Local Resources Program Agreements; Review and consider the City of Beverly Hills' approved Final Mitigated Negative Declaration and take related CEQA actions; and authorize the General Manager to reinstate and amend the existing Local Resources Program agreement for the Beverly Hills Desalter Project (WPS) **21-490**

Attachments: [10122021 WPS 7-8 B-L.pdf](#)
[10122021 7-8 ATT 2 - Beverly Hills Desalter Environmental Docs](#)
[10122021 WPS 7-8 Presentation.pdf](#)
[LRP Modification Support letter - 7-8](#)

- 7-9** Adopt a Resolution declaring certain Metropolitan-owned real property in the Palo Verde Valley in the counties of Imperial and Riverside as exempt surplus land pursuant to California Government Code Section 54221; the General Manager has determined the proposed action is exempt or otherwise not subject to CEQA (RPAM) **21-486**

Attachments: [10122021 RPAM 7-9 B-L.pdf](#)
[10122021 RPAM 7-9 Presentation.pdf](#)
[Resolution 9286](#)

- 7-10** Review and consider the City of Perris' certified Final Environmental Impact Report and take related CEQA actions, and authorize the General Manager to grant a permanent easement to the City of Perris for public road purposes traversing Metropolitan fee-owned property in the city of Perris and identified as Riverside County Assessor Parcel Numbers 317-170-017 and 303-050-003 (RPAM) **21-488**

Attachments: [10122021 RPAM 7-10 B-L.pdf](#)
[10122021 RPAM 7-10 A-2 - City of Perris Easement](#)
[10122021 RPAM 7-10 Presentation.pdf](#)

- 7-11** Authorize five new agricultural leases with Coxco, LLC, Joey DeConinck Farms, and HayDay Farms Venture, LLC, thereby allowing these existing lessees to continue their farming operations on Metropolitan's fee-owned properties in the Palo Verde Valley. General Manager has determined that the proposed action is exempt or otherwise not subject to CEQA.

[21-487](#)

[Conference with real property negotiators; properties are approximately 18,086 gross acres of land north and south of Interstate 10 near Blythe, California in the counties of Riverside and Imperial, also known as PROPERTY GROUP 1: RIVERSIDE COUNTY ASSESSOR PARCEL NOS. 821-100-018; 821-100-019; 821-150-018; 821-160-012; 821-160-013; 824-200-048; 863-140-002; 863-150-001; 863-170-005; 863-170-006; 863-180-003; 863-180-004; 863-180-005; 863-220-005; 866-040-004; 866-040-005; 866-040-007; 866-040-008; 866-080-001; 866-080-002; 866-080-003; 866-080-005; 866-080-012; 866-090-002; 866-090-009; 866-090-010; 866-090-013; 866-090-014; 872-150-005; 872-160-006; 872-160-007; 872-160-008; 872-160-009; 872-180-006; 872-180-009; 878-020-004; 878-020-005; 878-020-008; 878-030-009; 878-030-016; 878-091-001; 878-091-005; 878-091-006 PROPERTY GROUP 2: RIVERSIDE COUNTY ASSESSOR PARCEL NOS. 833-210-006; 833-210-012; 833-260-001; 833-260-003; 833-260-004; 833-260-005; 833-270-003; 833-270-004; 833-270-00 PROPERTY GROUP 3: RIVERSIDE COUNTY ASSESSOR PARCEL NOS. 878-081-001; 878-081-002; 878-081-004; 878-081-005; 878-081-006; 878-081-012; 878-082-001; 878-082-007; 878-111-017; 878-112-014; 878-112-015; 878-120-013; 878-120-015; 878-130-010; 878-130-011; 878-161-014; 878-161-015; 878-162-002; 878-162-003; 878-191-004; 878-192-001; 878-192-002; 878-193-007; 878-193-011; 878-193-013; 878-201-001; 878-220-005; 878-220-014; 878-220-015; 878-230-006; 878-230-007; 878-230-008; 878-240-021; 879-210-026; 879-240-007; 879-240-029; 879-240-032; 879-240-033; 879-261-004; 879-262-005; 879-262-011; 879-262-014 AND IMPERIAL COUNTY ASSESSOR PARCEL NUMBERS 006-090-003; 006-210-009; 006-210-021; 006-210-029; 006-220-010; 006-220-013; 006-220-019; 006-220-021; 006-220-022; 006-220-058 PROPERTY GROUP 4: IMPERIAL COUNTY ASSESSOR PARCEL NUMBERS 006-090-008; 006-090-009; 006-090-010; 006-090-011; 006-090-012; 006-090-013; 006-090-029; 006-120-082; 006-120-089; 006-150-065; 006-220-057 PROPERTY GROUP 5: RIVERSIDE COUNTY ASSESSOR PARCEL NOS. 866-130-001; 866-130-002; 866-130-003; 866-130-004; 866-210-006; 866-210-010; 866-240-004; 866-240-009; 866-250-008;

866-250-009; 866-250-011; 869-130-001; 869-270-006;
 869-270-010; 869-291-002; 869-291-003; 869-291-005;
 869-291-009; 869-292-001; 869-292-002; 869-292-003;
 872-080-006; 872-080-007; 872-080-008; 872-090-005;
 872-090-006; 872-090-007; 872-090-008; 872-100-001;
 872-340-014; 872-340-018; 872-352-003; 872-352-010;
 872-352-017; 872-360-001; 872-360-003; 872-370-002;
 872-370-008; 872-370-013; 872-370-014; 872-370-016;
 872-370-018; 875-021-001; 875-021-002; 875-021-006;
 875-021-007; 875-021-008; 875-021-013; 875-021-014;
 875-022-003; 875-022-004; 875-022-005; 875-022-006;
 875-022-012; 875-030-012; 875-030-014; 875-030-027;
 875-030-028; 875-040-006; 875-071-001; 875-071-002;
 875-071-003; 875-071-004; 875-071-005; 875-071-006;
 875-071-007; 875-071-012; 875-071-013; 875-071-014;
 875-071-015; 875-131-005; 875-131-006; 875-131-009;
 875-131-010; 875-171-001; 875-171-002; 875-250-010;
 878-040-008; 878-050-003; 878-050-004; 878-050-005;
 878-050-006; 878-050-010; 878-050-011; 878-050-012;
 878-050-013; 878-060-002; 878-070-001; 878-092-003;
 878-092-016; 878-092-017; 878-092-018; 878-101-004;
 878-101-005; 878-151-004; 878-151-005; 878-152-003;
 878-152-031; 878-202-003; 878-202-005; 878-240-009;
 878-240-010; 878-240-011; 878-240-012; agency negotiators:
 Anna Olvera and Kevin Webb; negotiating parties: Joseph Albert
 DeConinck dba Joey DeConinck Farms, Tim Cox dba Coxco LLC,
 and Dale Tyson dba HayDay Farms Venture LLC; under
 negotiation: price and terms; to be heard in closed session
 pursuant to Government Code Section 54956.8] (RPAM)

Attachments: [10122021 RPAM 7-11 Presentation.pdf](#)

- 7-12** Authorize settlement of OHL USA, Inc. v. The Metropolitan Water District of Southern California, Los Angeles Superior Court Case No. 19STCV27689; the General Manager has determined that the proposed action is exempt or otherwise not subject to CEQA [Conference with legal counsel - existing litigation; to be heard in closed session pursuant to Gov. Code Section 54956.9(d)(1)] [Item Added on 10/8/2021] (LC)

21-562

**** END OF CONSENT CALENDAR ITEMS ****

8. OTHER BOARD ITEMS - ACTION

- 8-1** Consider and adopt the Board's Statement of Commitment to Diversity, Equity, and Inclusion; the General Manager has determined that the proposed action is exempt or otherwise not subject to CEQA. [Added item on 10/8/2021] (Exec) [21-559](#)

Attachments: [10122021 Exec 8-1 B-L.pdf](#)

- 8-2** Chair and Vice Chair of committee appointments for the term commencing October 12, 2021 through January 1, 2023; the General Manager has determined that the proposed action is exempt or otherwise not subject to CEQA. [Added item on 10/8/2021] (Exec) [21-558](#)

9. BOARD INFORMATION ITEMS

- 9-1** Report on Conservation [21-491](#)

Attachments: [10122021 BOD 9-1 Report.pdf](#)

- 9-2** Compliance with Fund Requirements and Bond Indenture Provisions (FI) [21-479](#)

Attachments: [10122021 FI 9-2 B-L.pdf](#)

- 9-3** Update on expanded multimedia public awareness and outreach campaign for water conservation, including issuance of a request for proposals for a three-year contract for media buying services not to exceed \$10.5 million (CL) [21-483](#)

Attachments: [10122021 CL 9-3 B-L.pdf](#)
[10112021 CL 9-3 Presentation.pdf](#)

10. OTHER MATTERS

- 10-1** Discussion of Department Head Evaluation Process Guidelines and Department Head Evaluation Presentations [Public employee's performance evaluations; General Counsel, General Auditor, and Ethics Officer, to be heard in closed session pursuant to Gov. Code Section 54957] [21-370](#)

Attachments: [10122021 BOD 10-1 Presentation.pdf](#)

11. FOLLOW-UP ITEMS

None

12. FUTURE AGENDA ITEMS

13. ADJOURNMENT

NOTE:

At the discretion of the Board, all items appearing on this agenda and all committee agendas, whether or not expressly listed for action, may be deliberated and may be subject to action by the Board.

Each agenda item with a committee designation will be considered and a recommendation may be made by one or more committees prior to consideration and final action by the full Board of Directors. The committee designation appears in parenthesis at the end of the description of the agenda item e.g. (E&O, BF&I). Committee agendas may be obtained from the Executive Secretary.

Requests for a disability related modification or accommodation, including auxiliary aids or services, in order to attend or participate in a meeting should be made to the Executive Secretary in advance of the meeting to ensure availability of the requested service or accommodation.

October 12, 2021 Board Meeting

Item 5A



Metropolitan Water District of Southern California Summary of Events

Attended by Directors at Metropolitan's Expense in September 2021

Date(s)	Location	Meeting Hosted by:	Participating Director(s)
Sept 8-9	Costa Mesa, CA	Urban Water Institute	Larry Dick Russell Lefevre
Sept 23	Virtual	2021 Colorado River Symposium	Glen Peterson



● Chairwoman of the Board Monthly Activity Report – September 2021

Summary

This report highlights activities of the Chairwoman of the Board during the month of September 2021 on matters relating to The Metropolitan Water District of Southern California's business.

Monthly Activities

September 1

- Participated via teleconference and provided opening remarks at the first meeting of the newly formed Central Basin MWD Underserved Communities Caucus along with General Manager Hagekhalil. Left the meeting following my remarks to adhere to Brown Act requirements.

September 3

- Participated in a business lunch with General Manager Hagekhalil and General Counsel Scully to discuss matters of the Board

September 7

- Participated via teleconference with facilitator Rhonda Hilyer, President of Agreement Dynamics regarding upcoming Board of Directors retreat
- Participated via teleconference with General Manager Hagekhalil regarding matters of the Board

September 8

- Participated via teleconference in West Basin Municipal Water District's Caucus meeting

September 8-10

- Attended the 2021 Urban Water Institute Conference, Costa Mesa

September 9

- Participated via teleconference with General Manager Hagekhalil regarding matters of the Board

September 10

- Participated via teleconference with Assistant General Manager Zinke regarding matters of the Board

September 11

- Participated via teleconference with General Counsel Scully regarding matters of the Board

September 12-15

- Attended the American Water Works Association Conference, Phoenix, AZ

September 12

- Participated via teleconference with Director Dick regarding matters of the Board

- Participated via teleconference with facilitator Rhonda Hilyer, President of Agreement Dynamics regarding upcoming Board of Directors retreat

September 13

- Participated via teleconference in Metropolitan's Finance and Insurance Committee meeting
- Participated via teleconference in Metropolitan's Engineering and Operations Committee meeting
- Participated via teleconference in Metropolitan's Water Planning and Stewardship Committee meeting
- Participated via teleconference in Metropolitan's Communications and Legislation Committee meeting
- Participated via teleconference in Metropolitan's Organization, Personnel and Technology Committee meeting

September 14

- Participated via teleconference in Metropolitan's Legal and Claims Committee meeting
- Participated via teleconference in Metropolitan's Real Property and Asset Management Committee meeting
- Participated via teleconference in Metropolitan's Board meeting
- Participated via teleconference in Metropolitan's Facilities Naming Ad hoc Committee meeting
- Participated via teleconference with JCL Consulting facilitator JC Lacey regarding upcoming Board of Directors retreat
- Participated via teleconference with General Manager Hagekhalil regarding matters of the Board

September 15

- Participated via teleconference with Metropolitan's Employee Resource Groups, Metropolitan's Bargaining Units, General Manager Hagekhalil, General Counsel Scully, Ethics Officer Salinas, and Metropolitan's Executive Management at Metropolitan's Diversity, Equity, and Inclusion Council meeting
- Participated via teleconference with Ethics Officer Salinas regarding ethics related matters

September 17-20

- Attended the California Contract Cities Association 2021 Fall Educational Summit, Indian Wells

September 17

- Participated via teleconference with General Manager Hagekhalil regarding matters of the Board

September 21

- Participated via teleconference with City of Los Angeles Director of Infrastructure Rebecca Rasmussen, Deputy Mayor Barbara Romero, and Metropolitan's Directors Repenning and Quinn, and General Manager Hagekhalil to discuss water issues
- Participated via teleconference with General Manager Hagekhalil regarding matters of the Board

September 22

- Participated via teleconference with General Manager Hagekhalil and General Counsel Scully regarding ongoing litigation matters
- Participated via teleconference and provided remarks on the University of Arizona's Drought in the Colorado River Basin panel

September 23

- Participated via teleconference with Vice Chairs Kurtz, De Jesus and Repenning to discuss matters of the Board

September 24

- Participated via teleconference in the California African American Water Education Foundation 2022 Strategic Planning meeting

September 28

- Participated via teleconference in Metropolitan's Integrated Resources Planning Committee meeting
- Participated via teleconference in Metropolitan's Bay-Delta Committee meeting
- Participated via teleconference in Metropolitan's Executive Committee meeting
- Participated via teleconference in Metropolitan's Special Board meeting
- Participated via teleconference in Metropolitan's Conservation and Local Resources Committee meeting

September 29-30

- Attended Metropolitan's 2021 Board of Directors Retreat, Temecula

September 30

- Attended the Metropolitan Water District of Orange County's Water Policy Dinner, Costa Mesa



The GENERAL MANAGER Monthly Report

**Activities for the Month of
September 2021**

This report identifies the actions and activities taking place during the month that support the objectives of the General Manager's Fiscal Year 2020/21 Strategic Priorities and the Core Business of the GM's work groups.



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ADMINISTRATIVE SERVICES

CORE BUSINESS: Business Processes Advance value-added business process improvements to increase effectiveness and efficiency while striving for innovation, flexibility, and integration with technology.

Accomplishments

Despite the pandemic, the Contracting Services Unit's Investment Recovery program ended FY 2020/21 with an outstanding year. All auctions for Metropolitan's end-of-life assets were listed online with all safety regulations in place to complete sales of over half a million dollars (\$579,221), a new record.

BAY-DELTA INITIATIVES

GM STRATEGIC PRIORITY #1: Resiliency

Objective # 1 Pursue the development of adaptive management decision processes, governance, and funding mechanisms that would provide effective and stable means of meeting State Water Project (SWP) regulatory requirements.

Staff continued to participate in the collaborative groups called for in the 2019 Biological Opinions (BiOp) for the State Water Project (SWP) and Central Valley Project, and in the 2020 Incidental Take Permit (ITP) for Long-term Operation of the SWP, to address science needs and inform management and operation of the water projects. In September, staff participated in the Delta Coordination Group's effort to conduct a structured decision-making process to evaluate the effectiveness of summer and fall habitat actions for Delta smelt. The group is currently developing performance metrics to evaluate the actions. Staff also continued collaboration with the state and federal agencies to develop a Juvenile Production Estimate for Spring-run Chinook salmon as a condition required by the ITP. Current efforts are focused on developing alternatives for a monitoring program (e.g., what would be monitored and where).

Staff continued collaboration with the state and federal agencies to develop a monitoring program for steelhead as a condition of the 2019 BiOp. The monitoring plan would encompass steelhead populations within the San Joaquin Basin and/or the San Joaquin River downstream of the confluence of the Stanislaus River and would include steelhead and rainbow trout. The group is drafting conceptual models for each life stage of steelhead to help identify monitoring needed for each life stage.

GM STRATEGIC PRIORITY #2: Sustainability

Objective # 1 Pursue completion of the planning and permitting process for the single tunnel Delta Conveyance Project (DCP).

Delta Conveyance

The California Department of Water Resources (DWR) is continuing to develop an Environmental Impact Report (EIR) under the California Environmental Quality Act (CEQA).

Field activities in the Delta for Soil Investigations are proceeding to support the Initial Study/Mitigated Negative Declaration (including cone penetration tests, soil borings, and geophysical surveys). Field investigations will continue in mid-September following a short break from July–August 2021. Additionally, DWR and the Delta Conveyance Design Construction Authority (DCA) are continuing work to obtain temporary entry for additional soil surveys on private lands. DWR is also continuing to pursue permits for soil survey sites that fall under the jurisdiction of the Rivers and Harbors Act (Section 408). Investigations at any given site will not occur until property owners have been notified and required permits and approvals for that site have been obtained.

DWR completed the last of the four technical webinars designed to inform the public and interested stakeholders about the approaches and methodologies used in conducting impact analyses in the Draft EIR. The final webinar on Environmental Justice was presented on September 16. All webinars were recorded and made available on DWR's website (<https://water.ca.gov/Programs/State-Water-Project/Delta-Conveyance/DCP-Informational-Webinars>). Information about impact findings and specific mitigation measures were not available for the webinars and will be included in future outreach efforts following publication of the public Draft EIR.

Joint Powers Authorities

The regularly scheduled Delta Conveyance Design and Construction Authority (DCA) Board of Directors meeting was held on September 16 and included regular staff reports and updates. The DCA Stakeholder Engagement Committee

BAY-DELTA INITIATIVES *continued*

met on September 22, where air quality and greenhouse gas methodologies used in CEQA analyses were presented by DWR.

The Delta Conveyance Finance Authority (DCFA) regularly scheduled September meeting was canceled.

Objective # 3 Engage in planning and permitting activities for the Sites Reservoir.

In their joint September 22 meeting, the Sites Project Authority Board (Authority Board) and the Sites Reservoir Committee (Reservoir Committee) authorized the Executive Director to execute a three-party agreement between the Authority Board, DWR, and Sites Reservoir participants that are also SWP Contractors to include the planning costs for the Sites Reservoir Project in the SWP Annual Statement of Charges.

The Authority Board and Reservoir Committee also approved Amendment 3 of the Project Agreement and Work Plan with a period of performance from January 1, 2022 to December 31, 2024 for the purpose of initiating participant home board review, deliberation, and execution of the agreement. The Executive Director was also authorized to execute a Federal Financial Assistance Agreement with the U.S. Bureau of Reclamation (Reclamation) for \$6.9 million in WIIN Act Funds and to submit the Final WSIP Feasibility Report to the California Water Commission to comply with Proposition 1.

Objective # 4 Develop and execute land use strategies for the Delta Islands that are consistent with board policies.

Staff continued efforts to develop studies to assist in preserving Delta smelt and evaluating existing ponds on Metropolitan's Delta Island properties to assess the suitability of the ponds for Delta smelt research. On September 15, staff hosted the Deputy Directors of DWR and their staff, and UC Davis researchers for a Bouldin Island tour to provide information and develop opportunities for collaboration on projects on the Delta Island properties. The main projects discussed included floating wetlands, Delta smelt mesocosms, and levee security.

GM STRATEGIC PRIORITY #3: Innovation

Objective # 1 Provide leadership through advancing scientific knowledge that promotes opportunities for the improvement of SWP supply reliability through the improvement and protection of estuarine processes, native species, and Delta ecosystem health.

On September 2, staff participated in the U.S. Fish and Wildlife Service (USFWS) Longfin smelt Workshop for the Species Status Assessment (SSA) and presented work on predictive mapping for larval/juvenile longfin smelt habitat. The workshop included presentations on the biology, ecology, distribution, and abundance of longfin smelt to inform USFWS SSA on longfin smelt.

Staff also continued participating in the Collaborative Science and Adaptive Management Program (CSAMP), including participation on the Collaborative Adaptive Management Team (CAMT). At the September 21 meeting, CAMT discussions focused on a proposal to evaluate information from past reviews of Delta monitoring programs and on potential science activities for the CAMT technical teams. Staff continued collaboration with the NGO participants on the CSAMP Salmon Recovery Initiative. The group is currently planning the second workshop to define salmon recovery in a broad sense through scientific technical discussions with salmonid experts.

BAY-DELTA INITIATIVES *continued*

CORE BUSINESS RELIABILITY

Objective # 1 Provide analysis of key regulations and legislation that may influence SWP supply reliability, Bay Delta water quality and environmental health.

In response to ongoing drought conditions and associated water supply shortages in the Sacramento-San Joaquin Delta watershed, on August 3, 2021, the State Water Resources Control Board (State Board) adopted a Delta watershed emergency regulation authorizing the curtailment of diversions when water is determined to be unavailable. On August 20, 2021, the State Board issued curtailments to approximately 4,500 water right holders in the Delta watershed to help protect drinking water supplies, prevent salinity intrusion, and minimize impacts to fisheries and the environment. The SWP has rights for the diversion of water to Lake Oroville, as well as rights in the south Delta for the diversion and re-diversion of stored water. These rights are post-1914-appropriative and consequently are affected by the State Board curtailment orders. DWR is working closely with State Board staff and the Reclamation to ensure that the water projects are working together to achieve compliance.

On August 31, 2021, State Board staff hosted two technical webinars to assist diverters in certifying compliance with curtailment orders issued on August 20, 2021. The morning session focused on Delta watershed claims and rights, and the afternoon session focused on additional reporting requirements for large diverters (greater than 5,000 acre-feet per year). State Board staff detailed how to complete and file the required forms, reviewed their deadlines, and described how to stay up to date with changing conditions through use of the State Board website (<https://www.waterboards.ca.gov/drought/delta/>) and distribution list.

Currently, the State Board has determined that riparian water right permits will not be curtailed in the Sacramento and San Joaquin Basins, including the Bay-Delta. Metropolitan holds riparian water right permits on its Delta island properties and, although not mandated to curtail diversions, Metropolitan staff is meeting with its Delta island agricultural lessees to assist in voluntary cutbacks.

On September 22, the State Board adopted drought emergency regulations for Mill and Deer Creeks in the Sacramento River watershed. The emergency minimum flow requirements due to insufficient flow for listed Central Valley Spring Run Chinook salmon and Central Valley Steelhead are consistent with recommendations from the National Marine Fisheries Service (NMFS) and the California Department of Fish and Wildlife and largely consistent with those adopted in 2014 and 2015. The scientific basis for the drought emergency minimum flows was supported in part by a new scientific paper authored by Metropolitan, NMFS, and university scientists regarding salmon migration and survival patterns. The study found that during previous droughts, the majority of salmon that left Mill and Deer Creek early in the spring perished while migrating to the ocean, while those that over-summered in cooler higher elevation habitats and migrated in the fall were the only survivors. This data suggests that providing cold-water habitats during the summer coupled with adequate fall flows are likely required for the persistence of Spring-run Chinook salmon on these tributaries. Therefore, fall base flows like those adopted by the State Board may be significantly important to federally listed Spring-run Chinook salmon during droughts.

BOARD SUPPORT TEAM

GM STRATEGIC PRIORITY #1: Resiliency

OBJECTIVE #1 Infrastructure Reliability

Metropolitan has adjusted to the pandemic by conducting committee/board meetings via video conference. Those who have dialed into those meetings have heard the voice of Rickita C. Hudson, Sr. Board Specialist on the Board Support Team, during the public comment section. In the past, the opportunities for the public to address the Board as required by government code section 54954.3(a) were in-person only. However, when the committee/board meetings were replaced with virtual meetings, the requirement to complete and submit paper cards changed to dialing in via teleconference. Ms. Hudson monitors the time and participants on the call.

Ms. Hudson uses five electronic devices to ensure that the public comment line is working correctly. She monitors the callers using the meeting center software while ensuring that the public insight video conferencing page is streaming in real-time with the committee/board virtual meetings. Before the meeting begins, she addresses the public, explaining how the process works, such as stating the speakers' time limit and announcing when meetings are delayed. Finally, she monitors the allotted speaking time and uses a buzzer to signal the end of that time.

To ensure that the public can continue to attend the virtual meetings, Metropolitan will keep the public line open until further notice to ensure that anyone who wishes to speak to the Board regarding the current agenda can communicate with them via teleconference.



CHIEF FINANCIAL OFFICER

CFO STRATEGIC PRIORITY: Maintain Strong Financial Position.

Provide timely and discerning financial analyses, planning, and management to ensure that forecasted revenues are sufficient to meet planned expenses and provide a prudent level of reserves consistent with Board policy.

Objective #1 Establish rates and charges to maintain moderate overall rate increases, minimize variability, and recover costs consistent with Board policy.

The Treasury and Debt Management team, in coordination with the Controller, prepared the required property tax rate analysis for board adoption and implementation by Metropolitan's six counties, represented within its boundaries. This process enables Metropolitan to collect approximately \$158.1 million to cover outstanding GO debt and SWC obligations over FY 21-22.

Objective #2 Manage risk to protect Metropolitan's assets against exposure to loss.

The Risk Management Unit completed 54 incident reports communicating instances of Metropolitan property damage, liability, workplace injuries, regulatory visits, and spills.

Risk Management completed 42 risk assessments on contracts, including professional service agreements, construction contracts, entry permits, special events, and film permits.

CORE PRIORITY: Business Continuity

Facilitate district-wide planning and training to prepare employees and managers to effectively carry out critical roles and recover mission essential functions thus ensuring continuity of operations and resiliency in the event of a disaster.

Objective #1 Manage the Business Continuity Management Program in accordance with Operating Policy A-06, policy.

- In partnership with Information Technology, conducted a successful Disaster Recovery Test of critical applications in the new El Segundo backup data center. Business users across the district tested the functionality of their critical applications to ensure continued operations at time of disaster.
- Participated in the COVID-19 task force bi-weekly meetings, planning for return to work.
- Continued planning and design for Business Continuity exercises, using a cyber-attack scenario.

CORE BUSINESS: Financial Management

Manage Metropolitan's finances in an ethical and transparent manner and provide consistent, clear, and timely financial reporting. Update Metropolitan's capital financing plans and work with rating agencies and investors to communicate Metropolitan's financial needs, strategies, and capabilities thus ensuring Metropolitan has cost effective access to capital markets and the ability to finance ongoing future needs. In addition, actively manage Metropolitan's short-term investment portfolio to meet ongoing liquidity needs and changing economic environments.

Objective #1 Record and report the financial activities of Metropolitan in a timely, accurate, and transparent manner to the Board, executive management, member agencies, and the financial community.

- Water transactions for August 2021 totaled 164.7 thousand acre-feet (TAF), which was 12.1 TAF higher than the budget of 152.6 TAF. This translates to \$152.1 million in revenues for August 2021, which were \$9.5 million higher than the budget of \$142.6 million.
- Year-to-date water transactions through August 2021 were 335.2 TAF, which was 29.7 TAF higher than the budget of 305.5 TAF. Year-to-date water revenues through August 2021 were \$307.8 million, which were \$22.0 million higher than the budget of \$285.8 million.
- In August 2021, Accounts Payable processed approximately 3,200 vendor invoices for payment and took advantage of about \$15,800 in discounts.

CHIEF FINANCIAL OFFICER *continued*

Objective #2 Ensure that internal controls are in place to provide assurance that assets are safeguarded, and financial information is fairly stated.

Treasury and Controller staff refined Metropolitan's monthly investment bank reconciliation for enhanced internal controls and accurate financial reporting.

Objective #5 Prudently manage the investment of Metropolitan's funds in accordance with policy guidelines and liquidity considerations.

- As of August 31, 2021, Metropolitan's investment portfolio balance was \$1,229.8 million; for the month of August 2021, Metropolitan's portfolio managers executed 41 trades.
- During the month of August 2021, Treasury staff processed 1,408 disbursements by check, 24 disbursements by Automated Clearing House (ACH), and 98 disbursements by wire transfer. Treasury staff also processed 74 receipts by check, 26 receipts by ACH, and 53 receipts by incoming wires and bank transfers.

ENGINEERING SERVICES

GM STRATEGIC PRIORITY #1: Enhance Infrastructure Safety, Security, and Resiliency

Objective #1: Manage and execute Board-authorized projects within the Capital Investment Plan (CIP) to ensure the reliable delivery of water to Metropolitan's member agencies.

Distribution System Reliability Program

This program maintains reliable water deliveries through specific repair and rehabilitation projects on Metropolitan's pipelines, reservoirs, and control structures. Recent activities include the following:

- **Lake Mathews Disaster Recovery Facility Upgrades** — This project makes structural upgrades to the building's roof and interior walls to resist seismic events. Upgrades fire suppression system. Constructs a retaining wall to ensure stability of the nearby slope. The contractor completed the excavation and concrete placement of the footing for the new structural concrete retaining wall located at the north side of the facility. Construction is approximately 45 percent complete; however, the contractor is currently experiencing Covid-19-related shortages of materials and vendor delays to the project, which will extend the contract by about six months.
- **Lake Mathews Facility Wastewater Replacement** — The project replaces the wastewater collection system at Lake Mathews and connects to a nearby municipal sewer system. Final design is complete and a board action for award of a construction contract is scheduled for October 2021.
- **Lake Mathews PCCP Valve Storage** — This project constructs a pre-engineered metal building for storage of Metropolitan-furnished equipment, such as valves and actuators, that will be used for upcoming prestressed concrete cylinder pipeline rehabilitation projects. Final design is 99 percent complete and is scheduled to be complete by October 2021.
- **Etiwanda Pipeline Rehabilitation, Stage 3** — This project replaces delaminated mortar lining in 5.5 miles of pipeline with polyurethane lining. This project was conducted in three stages. Stages 1 and 2, which included polyurethane lining of 3 miles are complete. Stage 3 will include polyurethane lining reline 2.5 miles of pipeline and steel lining of 1,300 feet of new internal steel pipe in areas with more extensive corrosion. Final design of Stage 3 work is 95 percent complete and is scheduled to be complete by January 2022. A November board action is planned to award a fabrication contract for steel liner pipe which will be furnished to future Stage 3 contractor. A board action is planned for late Spring 2022 to award a Stage 3 construction contract.
- **Casa Loma Siphon Upgrades** — This project will mitigate leaks associated with long-term ground subsidence and will improve seismic resilience of the siphon as it crosses the Casa Loma Fault. This project replaces approximately 1,200 feet of the Casa Loma Siphon Barrel No. 1 at a fault crossing using earthquake resistant ductile iron pipe (ERDIP) and welded steel pipe (WSP). The delivery of ERDIP and WSP is complete. Final design of the pipe installation construction package is complete and a board action for award of a construction contract is scheduled for December 2021.



Lake Mathews Disaster Recovery Facility Upgrades

Contractor installs shoring on the north side of the building in preparation for retaining wall construction

Prestressed Concrete Cylinder Pipe (PCCP) Reliability Program

This program was established to enhance the reliability of Metropolitan's water distribution system and to reduce the risk of costly emergency repairs of PCCP. The priority pipelines included in the program are the Second Lower Feeder, Sepulveda Feeder, Calabasas Feeder, Rialto Pipeline, and the Allen-McColloch Pipeline. A total of 100 miles of PCCP pipelines will eventually be relined with new steel pipe liners under this 20-year program. Recent activities include the following:

- **Second Lower Feeder PCCP Rehabilitation**—This project rehabilitates the remaining 28 miles of PCCP segments within the Second Lower Feeder and will enhance delivery reliability to member agencies. Long-term rehabilitation of this pipeline is being staged over a period of eight to ten years, with multiple construction and procurement contracts. Final design of Reach 3, the westernmost portion of Second Lower Feeder, spanning approximately 4.7 miles through the cities of Lomita, Torrance, Los Angeles, and Rolling Hills Estates, is 97 percent complete and is scheduled to be completed by December 2021. Study efforts continue for Reach 9, an approximately 0.8-mile-long portion of Second Lower Feeder in western Long Beach that crosses the Los Angeles River.

ENGINEERING SERVICES *continued*

- **Second Lower Feeder Isolation Valve Procurement**—This fabrication contract provides 13 conical plug valves for the Second Lower Feeder PCCP rehabilitation. These valves, which include three 48-inch and ten 54-inch diameter, provide primary isolation for maintenance activities, inspections, and repairs required to maintain reliable water deliveries within Metropolitan’s distribution system. Fabrication of these valves is approximately 49 percent complete. Two 48-inch conical plug valves were completed and delivered in July 2021. The third 48-inch valve was delivered on October 2021. Fabrication of seven 54-inch valves is in progress. Two of the 54-inch valves are scheduled to be delivered in January 2022 and five more in October 2022. Fabrication of three remaining 54-inch valves is scheduled to start in 2022 and to be completed in mid-2023.
- **Sepulveda Feeder PCCP Rehabilitation**—This project rehabilitates the remaining 35 miles of PCCP segments within the Sepulveda Feeder and will enhance delivery reliability to member agencies. Long-term rehabilitation of the Sepulveda Feeder will be staged over multiple years with multiple construction and procurement contracts. Final design of Reach 1 and Reach 2 are occurring simultaneously and are scheduled to be complete by February 2023. Preliminary design to rehabilitate the remaining reaches of the feeder continues.

Colorado River Aqueduct (CRA) Reliability Program

This program maintains the reliability of Metropolitan’s CRA conveyance system. Recent activities include the following:

- **CRA Storage Buildings at Hinds, Eagle Mountain, and Iron Mountain**—This project furnishes and installs two new storage buildings (six total) and constructs associated site improvements at the Hinds, Eagle Mountain, and Iron Mountain Pumping Plants. Final design is 80 percent complete and scheduled to be complete by January 2022.
- **CRA Cranes Rehabilitation**—This project replaces the pumphouse overhead bridge cranes, retrofits the support structure of the below grade pump bays, and upgrades the crane electrical system at the Colorado River Aqueduct’s Pumping Plants. Construction is 3 percent complete with the contractor preparing to begin on-site work activities by correcting misalignments in the existing pumphouse crane rails. Construction is scheduled to be complete by September 2023.
- **Gene Wash Reservoir Discharge Structure Rehabilitation**—This project replaces the existing deteriorated discharge valve and refurbishes the valve house and discharge structure at the base of the Gene Wash Reservoir dam. If the reservoir needed to be drained rapidly in the event of an emergency, the valve would be opened to safely release the water. The contractor is currently coating the valve house interior walls and relining the sluiceway pipe. Construction is 67 percent complete and is scheduled to be complete by November 2021.

Treatment Plant Reliability Program

This program was initiated to maintain reliability and improve the operating efficiency of Metropolitan’s water treatment plants through specific improvement projects. Recent activities include the following:

Weymouth Plant

- **Weymouth Chlorination System Upgrades**—This project expands the existing chlorine building to house additional chlorination feed equipment and instrumentation at the Weymouth plant. The chlorination system at the Weymouth plant is a critical component of the plant’s disinfection process. The contractor is currently working on rewiring motor controls in existing electrical room, installing conduit and electrical panels in the existing maintenance shop and conduits in the existing evaporator rooms. Staff successfully completed the 21-day wet chlorine system testing for the new south chlorine system on August 31 and will start the wet testing of the existing chlorine system in September 2021. Construction is 98 percent complete and is scheduled to be complete by November 2021.

ENGINEERING SERVICES *continued*

- **Weymouth Water Quality Instrumentation Improvements**—This project will improve monitoring and rapid response to changing water quality conditions at the Weymouth plant. The contractor is currently performing motor control center, uninterruptible power supply, and instrument panel testing and training. Construction is 99 percent complete and is scheduled to be complete by October 2021.

Diemer Plant

- **Diemer Water Sampling System Improvements**—This project upgrades the existing Diemer water sampling system, comprising 13 sample locations, and will improve the accuracy and timeliness of collected data. At each location, the sample pump, piping, and field analyzers will be upgraded by Metropolitan staff. All materials and equipment have been procured for this project and Metropolitan staff continues installation and commissioning activities for water quality field analyzers. Construction is 97 percent complete and is scheduled to be complete by December 2021.

Jensen Plant

- **Jensen Electrical Upgrades, Stage 2**—This three-stage project upgrades the electrical system with dual power feeds to key process equipment to comply with current codes and industry practice and improves plant reliability and enhances worker safety. Stage 1 work is complete. Stage 2 improvements will upgrade Unit Power Controllers 7 and 9 and their associated motor control centers (MCCs) to support critical process equipment. The contractor completed energizing two MCCs and continues to work on Building 12 and cutover of other MCCs. Construction is 88 percent complete and is scheduled to be complete by August 2022.

System Reliability Program

The System Reliability Program consists of projects to improve or modify facilities located throughout Metropolitan's service area in order to use new processes and/or technologies and improve facility safety and overall reliability. Recent activities include the following:

- **Headquarters Building Improvements**—This project provides seismic upgrades and other needed improvements to the Metropolitan Headquarters Building. Construction related to the original contract scope is substantially complete, pending exterior façade cleaning. The contractor continues to work on approved change order scope items such as the electrical work for the power door assist devices and UVC air disinfection system. Staff is working with the contractor to complete change order work while the building remains lightly occupied. The anticipated contract completion is in the first quarter of 2022.
- **Board and Committee Room Upgrades**—This project upgrades and enhances the reliability of the audio/visual (A/V) systems in the boardroom, three committee rooms and the rotunda at the Metropolitan Headquarters Building. Engineering Services, IT, and Facilities Management are working collaboratively on this technology replacement project. Installation of the A/V equipment has been included as a board-approved change order to the original Headquarters Building Improvement contract, described in the previous paragraph. The contractor has completed A/V equipment installation, commissioning, and user acceptance activities in the committee rooms and the boardroom. Construction is substantially complete, and all systems are fully operational, pending redundant network installations scheduled to be complete by December 2021.
- **Headquarters Physical Security Upgrades**—This project implements comprehensive security upgrades for the Metropolitan Headquarters Building. These upgrades are consistent with federally recommended best practices for government buildings. This work has been prioritized and staged to minimize rework and impacts on day-to-day operations within the building. Stage 1 work enhances security related to perimeter windows and doors. Stage 2 improvements will provide security system upgrades inside the building with a focus on the main entry rotunda area, board room, executive dining lounge, and security control room. Stage 3 improvements will provide security system upgrades around the perimeter of the building. Construction of Stage 1 improvements is complete. Construction of Stage 2 improvements is 60 percent complete and is scheduled to be complete by

ENGINEERING SERVICES *continued*

January 2022. The contractor completed the installation of security equipment, card readers and cameras and is scheduled to begin cutover to the new security system. Stage 3 improvements are currently in the design phase and are scheduled to be complete by November 2021.

- **Headquarters Building Fire Alarm and Smoke Control System Upgrades**—This project upgrades the Metropolitan Headquarters Building fire life safety systems, which includes replacement of the fire detection and alarm system and HVAC system improvements for smoke control. The fire alarm and smoke control systems in the Metropolitan Headquarters Building provide detection, notification, and control of building functions so that occupants and visitors can safely exit in the event of a fire. The contractor completed the fire alarm riser and replacement of wallpaper with paint in the elevator lobbies. The contractor is continuing installation of the electrical closet and the Emergency Radio Responder System and is scheduled to begin cutover to the new fire alarm system in October. Construction is 25 percent complete and is planned to be complete by February 2023.



Headquarters Building Improvements
First floor rotunda preparation for new LED light installation

ENVIRONMENTAL PLANNING

GM STRATEGIC PRIORITY #1: Resiliency

Objective #1 Provide planning, California Environmental Quality Act (CEQA)/National Environmental Policy Act (NEPA), and regulatory permitting support for programs and projects that focus on infrastructure reliability and redundancy.

Foothill Feeder

- Finalized and scheduled restoration activities with the Mountains Recreation and Conservation Authority to ensure that Metropolitan's mitigation and permitting obligations are fulfilled at the Stickleback River Ranch conservation site.

Weymouth Water Treatment Plant Basins 5-8 Rehabilitation

- Continued review of the draft Addendum to the 2015 Environmental Impact Report (EIR) for Weymouth Plant Improvements.

Objective #2 Emphasize employee development and recruitment, knowledge capture, cross-training, management/leadership training, and succession planning.

Webinars attended by staff:

- Power Operations and Planning Part 2: How the CAISO and Energy Markets Work and How Metropolitan participates in the CAISO.

GM STRATEGIC PRIORITY #2: Sustainability

Objective #2 Provide planning, CEQA/NEPA, and regulatory permitting support for projects and activities that address the challenges of sustainability, including aging infrastructure, contaminants of concern, and affordability of water supplies.

Delta Conveyance Project

- Began review of the second Administrative Draft EIR.

Regional Recycled Water Program

- Attended community briefings in support of External Affairs public outreach efforts.
- Supported evaluation of proposals submitted in response to the Environmental Planning Services Request for Proposal.

Objective #3 Continue to actively manage Metropolitan's more than 30,000 acres of conservation lands through cooperative relationships with public agencies and non-governmental conservation organizations to promote sustainability of reserve resources.

Lake Mathews Multiple Species Reserve

- Completed draft Fire Response Plan Map, which will improve firefighting coordination efforts by Reserve management staff.
- Installed wildlife-monitoring motion-activated cameras throughout the Reserve to monitor for terrestrial species.
- Inspected and maintained artificial burrowing owl burrows, including clean-out and leveling of burrow entrances, thinning vegetation around burrow entrances, and repairing or replacing broken or missing perches.

ENVIRONMENTAL PLANNING *continued*

Southwestern Riverside County Multi-Species Reserve

- Updated the Reserve fire history and management unit maps, which will be used to advise the Reserve Management Committee and CalFire on management of reserve activities and resources.
- Completed weed abatement for Stephens' kangaroo rat (*Dipodomys stephensi*) habitat management.
- Coordinated with California Department of Fish and Wildlife (CDFW) wardens in advance of dove hunting season to prevent potential poaching and trespassing on Reserve land.

Objective #4 Develop a Climate Action Plan (CAP) and prepare CEQA documentation to be used to offset greenhouse (GHG) emissions from future construction projects. Identify new and continuing conservation efforts for the purpose of reducing future GHG reductions, as well as highlighting Metropolitan's effort to achieve those reductions, and develop a tracking methodology to ensure Metropolitan is meeting its goal.

- Prepared a board letter and presentation to request an increase in funds to complete updates to the draft CAP.
- Distributed a preliminary draft version of the CAP for peer review to staff from the counties in Metropolitan's service area, San Diego County Water Authority, and Santa Clara Valley Water District.
- Gave overview presentation of proposed CAP to Green LA Water Committee on September 23, 2021.
- Participated in preparation of and circulated for internal review the draft Scope of Work for the Zero Emissions/Near-Zero Emissions Transition Plan.
- Participated in the Water Energy Climate Sustainability (WECS) Core Team to monitor and discuss projects, regulatory and legislative changes, and emerging concerns that may affect Metropolitan's WECS efforts.

GM STRATEGIC PRIORITY #3 Innovation

Objective #3 Partner and collaborate with regulatory and resources agencies, as well as other public agencies and external organizations, to build relationships and expedite/streamline environmental authorizations and clearances for Metropolitan projects.

- Continued coordination with CDFW Regions 5 and 6 management to execute a new agreement for dedicated staff resources to expedite permitting of Metropolitan projects.
- Continued participation in a series of meetings to develop the Joint Powers Authority agreement for the Upper Santa Ana River Habitat Conservation Plan (HCP).

CORE BUSINESS: Regulatory Compliance

Objective #1 Provide timely and professional environmental planning services and CEQA and regulatory permitting support to ESG, WSO, WRM, External Affairs, and Real Property groups.

Engineering Services

- Provided design phase support for: Battery Energy Storage Systems at Weymouth Water Treatment Plant
- Provided environmental support for:
 - Black Metal Mountain 2.4 kV Electrical Line Rehabilitation
 - Copper Basin Access Road and Discharge Valve Repair
 - CRA 69kV and 230kV Transformers Replacement
 - CRA Cholla Wash Conduit Lining
 - CRA Delivery Line Rehabilitation
 - CRA Domestic Water Treatment System Replacement Project.
 - CRA Erosion Protection
 - CRA Mile 12 Flow Monitoring Station Upgrades

ENVIRONMENTAL PLANNING *continued*

- CRA Pump Plant 2.3 kV and 480V Rehabilitation
- CRA Overhead Cranes Projects
- CRA Storage Buildings
- Gene Wash Discharge Valve Rehabilitation
- Garvey Reservoir Rehabilitation Project
- Headquarters Tower WiFi Upgrades
- Headquarters Second Floor North Wing TI Project
- Jensen Ozone Power Supply Units Replacement
- Jensen San Fernando Entrance Repaving
- Jensen Vehicle Maintenance Building Roof Replacement
- Lake Mathews Electrical Upgrades and New Pressure Control Structure
- Lake Mathews Tank Farm Roof Replacement
- Lake Perris Seepage
- Live Oak Reservoir Asphalt Relining
- Mills Electrical Upgrades Stage 2
- Perris Valley Pipeline
- San Diego Canal Repair
- San Gabriel Tower Seismic Upgrades
- Western San Bernardino Right-of-Way and Infrastructure Protection Program
- Weymouth Administration Building Seismic Upgrades
- Weymouth Basin 5-8 Rehabilitation
- Provided construction phase support for:
 - Garvey Reservoir Permanent Drainage and Erosion Control Project
- Completed environmental monitoring and reporting for:
 - CRA 6.9kV Cable Replacement
 - CRA Discharge Line Isolation and Couplings Repair Projects.
 - CRA Overhead Cranes Replacement
 - Gene Wash Reservoir Discharge Valve Replacement
 - CRA Exposed Barrel Repairs Project

Water System Operations

- Provided CEQA analysis and environmental planning support for the following projects:
 - Diemer nest removal for fire alarm requirements
 - Jensen Basin 12 return to service
 - Lake Mathews Road Grading
 - Live Oak Reservoir Desilting Basin Erosion Control
 - Rialto Feeder Road Grading
 - San Jacinto Tree Removal
 - Santiago Lateral Road Grading
- Completed environmental monitoring and reporting for:
 - CRA shutdown
 - Desert region maintenance activities
- Obtained emergency permits from U.S. Army Corps of Engineers (USACE) and Santa Ana Regional Water Quality Control Board for patrol road repairs along the Box Springs Feeder through Sycamore Canyon Park, as requested by CalFire and City of Riverside.
- Submitted Notification of Streambed Alteration to CDFW in support of the planned January 2022 Lake Skinner Outlet Tower Shutdown.
- Presented an Environmental Planning coordination process overview at the annual shutdown planning meeting.

ENVIRONMENTAL PLANNING *continued*

Water Resource Management

- Commented on the draft Carbon Capture and Storage in the California Delta Report.

External Document Reviews

- Reviewed 22 CEQA Notices for external projects and prepared comment letters for those that may affect Metropolitan facilities and/or operations.
- Provided Federal Register review and coordinated responses for those that may affect Metropolitan facilities and/or operations, including a comment letter in response to the U.S. Environmental Protection Agency and USACE request for pre-proposal comments on the definition of Waters of the United States under the Clean Water Act.

Legislative Support

- Supported preparation of Sponsor and Coalition Letter signed by the General Manager and Chairwoman Gray to request Governor Newsom's support of AB 442 (Metropolitan's Surface Mining and Reclamation Act legislation) and a thank you letter to Assembly Member Chad Mayes for his support and sponsorship of AB 442.
- Continued monitoring status of and responding to requests regarding AB 442, which was signed by the Governor on September 16, and will go into effect January 1, 2022.
- Provided legislative analysis on SB 712.

Real Property Support

- Provided CEQA analysis and determination in support of one real property agreement.

EXTERNAL AFFAIRS

EXTERNAL AFFAIRS PRIORITY: Advance Initiatives to Educate and Inform the Public, Elected Officials and Stakeholders on Water Supply Conditions and Important Water Management Decisions.

External Affairs will develop and maintain relationships with the public, legislative leaders, government officials, non-governmental organizations, and other stakeholders, and implement effective and diverse communication and outreach strategies on the value of water, current water supply conditions, innovative strategies to address current and future challenges, and the importance of Metropolitan actions and leadership to promote stewardship, planning and investments to benefit the region.

Objective #1 Recognizing there is a new normal that is directly impacting California water conditions driven, in part, by more volatile supply conditions due to climate change, and informing key stakeholders, news media, businesses and the public on the need for sustained conservation actions, support for new water supply projects and continued investment in imported water systems to maintain water supply reliability and protect the environment.

Metropolitan's conservation campaign continued with the placement of new Spanish- and Chinese-language advertisements throughout the district's service area. Early results show 27 million impressions, driving 10,000 new visitors to bewaterwise.com since the start of the campaign in August. Traffic and weather radio ads are airing on 42 English- and Spanish-language stations, and 26 out-of-home billboards and transit shelter posters have been installed throughout the Southern California region. Grocery store print advertising placements are in Albertsons and Vons stores within disadvantaged community tracts, and Spanish-language print advertisements are featured in popular Latino grocery stores, including Superior and Cardenas.



Media interest in the drought and Metropolitan's operational and conservation activities remained high. Interviews included:

- KNX-AM 1070 reporter Margaret Carrero and Colorado River Resources Manager Hasencamp on Palo Verde system conservation agreement and land fallowing.
- LA Times reporter Ian James and Colorado River Resources Manager Hasencamp about land fallowing programs in California and the Colorado River Basin.
- Middle East Broadcasting Network reporter Steve Isaac and GM Hagekhalil regarding drought conditions in Southern California and Metropolitan's water supply alert.
- Univision reporter Jaime Garcia and External Affairs' Government Affairs Representative Cetina regarding water supply alert, drought, and tips for conservation.
- Telemundo reporter Gabriela Teissier and External Affairs' Government Affairs Representative Cetina on the station's morning show about water supply alert and need for conservation.

EXTERNAL AFFAIRS *continued*

- Rick Montanez of KCAL2 and AGM Upadhyay on the state water board's announcement of July conservation numbers.
- KPCC's Larry Mantle and AGM Upadhyay on Southern California's water supply conditions and the July conservation numbers (also featured Joaquin Esquivel).
- Interviews with various media organizations, including KABC7, KTLA, NBC 4, and CalMatters, and Resource Planning manager Demetri Polyzos on the state water board's July conservation numbers.

GM Hagekhalil spoke, Chairwoman Gray and Director Dick attended, and Metropolitan sponsored the Urban Water Institute's Fall Conference. (September 8-10).

Chairwoman Gray participated in a panel discussion on "Drought in the Colorado River Basin" at the University of Arizona's Institutes for Resilience as part of the Water Solutions for a Warmer World series. Other panelists included Chairwoman Amelia Flores, Colorado River Indian Tribal Council; Terry Goddard, Central Arizona Project Board; Taylor Hawes, The Nature Conservancy; and Paul Bruchez, Colorado River Basin Roundtable and Interbasin Compact Committee. (September 22)

CORE BUSINESS: Legislative, Communications, Community Relations, Public and Business Outreach

Engage the public, labor, business community, agriculture, government leaders, non-governmental organizations and other stakeholders in California's water issues, communicating Metropolitan's interests and Board-adopted policies through federal and state legislative strategies, multimedia and multi-cultural communications, and educational and other outreach programs. Inform the public about Metropolitan projects, facilities, operations and initiatives to gather input and support, foster competitive and diverse business opportunities, and facilitate innovation and technology sharing.

Objective #1 LEGISLATIVE SERVICES - Develop and implement local, state and federal legislative and regulatory strategies consistent with Board-adopted policies. Promote interaction between Metropolitan leadership and various stakeholders, including elected officials, to facilitate support for and garner greater understanding of water policy issues.

Federal

Metropolitan staff continued to advocate for funding for water programs in the budget reconciliation bill. The House proposal includes \$500 million for the new Department of Health and Human Services low income household water assistance program, \$1 billion for grants to help water systems mitigate the impacts of climate change, and tax parity for water conservation measures. The Senate continues to work on their version of this legislation.

State

Metropolitan sponsored legislation AB 442 (Mayes, I-Rancho Mirage): Surface Mining and Reclamation Act of 1975: exemption: Metropolitan Water District of Southern California was signed into law by the Governor.

Other bills passed by the legislature were SB 626 (Dodd, D-Napa): Department of Water Resources: procurement methods, which will result in significant cost savings for future repairs and maintenance to the State Water Project and habitat restoration projects, and AB 361(R. Rivas, D-Hollister) will allow state and local agencies to continue to meet virtually if a state emergency is declared and if it is determined that meeting in person would pose a public health risk.

SB 480 (D-Stern): Metropolitan Water District of Southern California: rules: inappropriate conduct became a two-year bill to allow the State Auditor time to complete work before deciding whether amendments to the legislation are necessary. SB 559 (Hurtado, D-Fresno): Department of Water Resources: water conveyance systems: Water Conveyance Restoration Fund, which would create a fund to address subsidence impacts, was also put on the inactive file.

The Legislature authorized \$4.649 billion over the next three years for water and drought and \$3.69 billion for climate resilience. Efforts by a broad coalition of water agencies, business, labor, and environmental groups, and a member

EXTERNAL AFFAIRS *continued*

request spearheaded by Assembly Member Santiago (D-Los Angeles) resulted in additional funding for Metropolitan's regional priorities, and made water agencies eligible to apply for these funds despite not being part of the Governor's Emergency Drought Proclamation.

A CEQA waiver for habitat restoration was also authorized until January 2025 for projects that conserve, restore, protect, enhance, or recover California native fish and wildlife.

Local

GM Hagekhalil was a panelist for the California Contract Cities Association 2021 Fall Education Summit and provided an update on Metropolitan, drought conditions, drought responses, and local supply projects. (September 17)



GM Hagekhalil, West Basin Director Houston and WRD General Manager Tucker at Contract Cities Association conference.

Group Manager Coffey participated in a panel with SoCal Gas and Southern California Edison at the Building Industry Association of Southern California Building Industry Show. He provided a regional utility update to home builders and land-use developers and discussed Metropolitan's water supply outlook for Southern California. (September 29)

GM Hagekhalil was the keynote speaker for the Municipal Water District of Orange County's Water Policy Dinner and discussed his vision to pursue a unified agenda among regional water providers. (September 30)

Metropolitan staff participated in or attended webinars and events throughout the service area with chambers of commerce, business associations, councils of governments, and public affairs networks, including:

- Los Angeles Area Chamber of Commerce State of L.A. Business (September 1)
- Ventura County Special District Association Board (September 1)
- Oxnard Leadership Steering Committee (September 1)
- Glendale Chamber of Commerce Business Advocacy/Legislative Review Committee (September 2)
- Santa Monica Chamber of Commerce Government Affairs Committee (September 2)
- LAX Coastal Chamber of Commerce Public Policy Committee (September 2)
- Manhattan Beach Chamber of Commerce Legislative Affairs Committee (September 7)
- South Orange County Economic Coalition Legislative Committee (September 8)
- Long Beach Chamber of Commerce Government Affairs Committee (September 9)
- Torrance Area Chamber of Commerce Government Affairs Committee (September 9)
- San Fernando City Chamber Board (September 9)
- Los Angeles County Business Federation Advocacy Committee (September 9)
- Beverly Hills Chamber of Commerce Government Affairs Committee (September 9)
- Water Associations of the County of Orange (September 10)
- Orange County Business Council Government Affairs Meeting (September 10)

EXTERNAL AFFAIRS *continued*

- Oxnard Business Advocacy Committee (September 13)
- Regional Chamber of Commerce - San Gabriel Valley Government Affairs Committee (September 13)
- Valley Industry and Commerce Association Transportation Committee (September 14)
- South Bay Association of Chambers of Commerce Board and Government Affairs Committee (September 14)
- Palos Verdes Peninsula Chamber of Commerce Legislative Affairs Committee (September 14)
- Orange County Business Council Infrastructure Committee (September 14)
- San Gabriel Valley Council of Governments Water Committee (September 14)
- Upland Chamber of Commerce Legislative Advocacy Committee (September 15)
- San Gabriel Valley Council of Governments Energy, Environment, and Natural Resources Committee (September 15)
- Los Angeles County Economic Development Corporation Board of Governors (September 15)
- Los Angeles County Board of Supervisors (September 15)
- Valley Industry and Commerce Association Government Affairs Committee (September 15)
- Coalition of Labor, Agriculture and Water Committee on Water, Housing, Energy, Environment and Labor (September 15)
- West Ventura County Business Alliance Business Advocacy Committee (September 16)
- San Gabriel Valley Legislative Coalition of Chambers (September 16)
- San Gabriel Valley Council of Governments Board (September 16)
- Orange County Indicators Report Presentation (September 16)
- Anaheim Chamber of Commerce Government Affairs Committee (September 17)
- United Chambers of Commerce Government Affairs Committee (September 20)
- Association of Water Agencies of Ventura County Water Symposium (September 21)
- Simi Valley Chamber of Commerce Legislative Affairs Committee (September 22)
- Valley Industry and Commerce Association Board (September 22)
- Huntington Beach Chamber of Commerce Government Affairs Meeting (September 22)
- San Gabriel Valley Public Affairs Network (September 22)
- Association of California Cities - Orange County Environment, Energy and Water Committee (September 23)
- Burbank Chamber of Commerce Board (September 23)
- West Ventura County Business Alliance Board (September 23)
- South Orange County Economic Coalition Meeting (September 24)
- California Women in Agriculture Ventura County Chapter Board (September 24)
- United Chambers of Commerce of the San Fernando Valley Board (September 27)
- El Segundo Chamber of Commerce Government and Military Affairs Committee (September 20)
- Redondo Beach Chamber of Commerce Government Affairs Committee (September 28)
- Chambers Alliance of Santa Barbara, San Luis Obispo, and Ventura Counties Board (September 28)
- Ventura County Economic and Development Committee Board (September 28)
- Gateway Chambers Alliance Governing Board (September 28)
- Los Angeles County Business Federation roundtable with Assembly Member Laura Friedman (D-Glendale) (September 29)
- San Gabriel Valley Economic Partnership Legislative Committee (September 29)
- Los Angeles Business Council Energy & Environment Committee (September 29)
- Construction Industry Coalition on Water Quality Board of Directors (September 29)
- City of Torrance Water Commission (September 29)
- State of Ventura County Briefing (September 30)
- Oxnard Leadership Steering Committee (September 30)

EXTERNAL AFFAIRS *continued*

- Harbor Association of Industry and Commerce Government Affairs Committee (September 30)

Objective #2 MEDIA AND COMMUNICATIONS - Communicate Metropolitan's policy priorities, actions and initiatives through various means to raise public awareness, enhance Metropolitan's visibility and cultivate support for Metropolitan priorities. Update and develop new communications tools, materials and platforms to ensure Metropolitan information reaches diverse audiences throughout its service area in a cost-effective, timely, relevant manner that reflects current communications trends.

Media Activities and Interviews

- Arranged interview with California Municipal Utilities Association writer Pamela Martineau and EO/AGM Upadhyay regarding the Regional Recycled Water Program and the role of water recycling in the region.
- Set up interview with Southern California Builder Magazine and GM Hagekhalil for an upcoming profile.
- Arranged interview with Meteorologist Mario Picazo, of Canada's The Weather Network TV station, and Water Resource Management Group Managers Coffey regarding Southern California's water supplies, climate change, and the RRWP.
- Arranged interview with Municipal Water Leader magazine and GM Hagekhalil for a feature profile.
- Arranged interview with Liz Smilor of Southern California News Group papers and GM Hagekhalil for a profile in the California Water newspaper supplement.
- Arranged interview with Fox 11 News and EO/AGM Upadhyay on water use at Metropolitan facilities.
- Coordinated interview with Lynn Lipinski, editor of AWWA's Source Magazine, and GM Hagekhalil for a feature profile.

Press Releases

- Partnership among Metropolitan, U.S. Bureau of Reclamation, Central Arizona Project, and the Southern Nevada Water Authority to fund a short-term agricultural land fallowing program in California's Palo Verde Valley that will conserve water on a large scale.
- Launch of a new conservation advertising campaign that pays homage to the many different lifestyles that make Southern California unique while empowering residents throughout the region to explore ways to build on their water-saving habits as severe drought conditions continue.
- Approval by Metropolitan and IID Boards of Directors of agreement to settle litigation related to the Drought Contingency Plan.

Website

- To provide additional assistance to consumers, a listing of professional landscape contractors is now featured on the district's turf replacement rebate page for their turf replacement projects. Featured contractors completed Water Resource Management's Water Efficient Landscaper Dual Certification Program and are EPA WaterSense-certified Qualified Water Efficient Landscape Professionals and Certified Water Managers.



EXTERNAL AFFAIRS *continued*

- Generated nearly 87,000 visits, more than double the previous month's activity, to the newly redesigned mwdh2o.com website, with the homepage, careers and job listing pages among the most popular.
- Received nearly 37,000 views on bewaterwise.com, with the turf replacement and California Friendly and native plant profiles the most popular pages.

Social Media

- Generated high organic engagement on Twitter with nearly 10,000 impressions from a post about Metropolitan's Colorado River water conservation partnership among the Bureau of Reclamation, Central Arizona Project, Southern Nevada Water Authority, and Palo Verde Irrigation.
- Highlighted employees throughout the month, including a Labor Day slideshow that showcased several employees at work, which received several thousand views across all platforms. A photo featuring staff at the Jensen Water Treatment Plant received strong engagement on LinkedIn, with nearly 3,000 impressions.



- Introduced the last in a series of characters for the We're California Friendly Plants campaign—Penny, the Mojave Beardtongue—on Facebook and Instagram.
- Celebrated Hispanic Heritage month with six videos featuring Metropolitan employees.

Creative Design

- Produced an in-house video on the launch of the redesigned MyHR site, which features a new look and feel with easier navigation and self-service functionality for employees.
- Partnered with Human Resources on a video tutorial of the employee benefits changes for the open enrollment period, featuring easy-to-follow motion animation of the step-by-step process to make benefits changes.
- Developed a series of videos for the Engineering and Operations virtual inspection trip.

Objective #3 PUBLIC OUTREACH AND MEMBER SERVICES - Conduct public outreach to increase awareness and input on Metropolitan projects and initiatives and ensure impacted communities are aware of Metropolitan construction and maintenance activities. Enhance public awareness of Metropolitan's systems and facilities and the role they play in regional supply reliability while protecting environmental resources. Serve as liaison to Metropolitan's member agencies and facilitate their engagement with Metropolitan.

Member Agency Support

Met with the Member Agency managers to discuss water supply conditions and operations, status of federal and state infrastructure funding bills, Colorado River and Voluntary Agreement negotiations, potential new conservation programs, modifications to the Local Resources Program, and agency responses to COVID-19 impacts. (September 3)

Conservation Outreach

Principal Public Affairs Representative Gonzalez presented to the California Water Efficiency Partnership on communications and drought messaging. (September 9)

EXTERNAL AFFAIRS *continued*

Regional Recycled Water Program

- Participated in a National Water Research Institute panel for the city of Boise to provide expert input on public outreach for potable reuse projects. (September 9)
- Met with Southeast Water Coalition Administrative Entity members to provide an update on the Regional Recycled Water Program. (September 16)
- Provided a tour of Regional Recycled Water Advanced Purification Center to the WaterReuse Association Board of Directors. (September 17)
- Provided a virtual tour of the Advanced Purification Center and presented on multiple panels at the 2021 WaterReuse California Annual Conference. (September 19-22)
- Provided a Regional Recycled Water Program update to the LA County Dept of Public Works. (September 23)
- Participated in the Los Angeles Green Building Council's "Reusing and Rethinking Water" panel, providing a presentation on the Regional Recycled Water Program. (September 30)



Spanish social media post on RRWP tours

Construction Outreach

Completed outreach for the Greg Avenue Pressure Control Structure Upgrades with distribution of thank you notices to the local community. (September 1)

Objective #4 EDUCATION AND COMMUNITY RELATIONS - Facilitate public engagement in and understanding of water resource issues through community relations activities and education projects. Build awareness of and appreciation among Southern California for the value of clean, reliable water supplies and the importance of good water stewardship.

Director Record and GM Hagekhalil attended and Metropolitan sponsored the Science Under the Stars event to benefit the Western Science Center at DVL. (September 11)

Directors Repenning and Quinn attended, and Metropolitan sponsored the LA Waterkeeper Making Waves annual event. (September 18)

GM Hagekhalil was honored at the Andres y Maria Cardenas Family Foundation's LA Tequila Festival. Other community leaders at the event were Senator Padilla (D-California), Congressman Martinez (D-Los Angeles), State Senator Hertzberg (D-Van Nuys), Assembly member Rivas (D-Los Angeles), and LA City Council President Nury Martinez. Metropolitan provided a separate sponsorship to the foundation to support a water education event. (September 25)

EXTERNAL AFFAIRS *continued*

Promoted a Future Supply Actions Program webinar hosted by Water Resource Management. The webinar featured a recent feasibility study conducted by Padre Dam Municipal Water District and San Diego County Water Authority to optimize the East County Advanced Water Purification Project. (September 15)

Education

Metropolitan staff virtually interacted with 2,200 teachers, students, and parents through online virtual tours, scouting programs, customized Zoom class presentations, and digital outreach. Meetings with the Member Agency education coordinators provided the opportunity to hear presentations on the new curriculum from California Project WET and Moments of Focus on climate change solutions and environmental justice. More than 90 Metropolitan staff attended an Open House to hear about education programs and resources.



Objective #5 BUSINESS OUTREACH AND INNOVATION - Facilitate opportunities for small businesses to work with Metropolitan. Help position Metropolitan as a leader in water innovation.

Metropolitan supported small businesses and entrepreneurs throughout the region with online participation and, in some cases, sponsorship of the following programs, online conferences, webinars, and events:

- Women's Business Enterprise Council's 2021 Platinum Supplier Program event (September 3)
- US Green Building Council LA's Chapter Leaders, DEI committee (September 8)
- NetZERO's Climate Change Conference (September 14-16)
- LADWP and East Bay MUD meeting on Regional Smart Infrastructure Center (September 24)
- LADWP presentation on new technology for more efficient identification and collection of data on anomalies in dams. (September 29)

Convened a presentation from Isle Utilities on how water-stressed areas are managing evaporation loss and identifying innovative solutions. This effort was in response to a GM directive to explore new technologies to minimize the loss of water from reservoirs. (September 6)

Staff hosted a meeting with the Counsel General of the Netherlands, at which several Dutch companies presented to a group of water industry experts that included MWD and LADWP management. (September 22)

HUMAN RESOURCES

GM STRATEGIC PRIORITY #1: RESILIENCY

Objective #1 Partner with Metropolitan leadership to support learning, development, and adaptive workforce planning initiatives.

The Organizational Development and Training Unit kicked off its second virtual Metropolitan Leadership University, a ten-session, bi-monthly program for 25 newly promoted managers. The objective of this first module is to introduce best practices in leading teams and identify potential growth areas for program participants to focus on development throughout the program.

This month, 335 Metropolitan employees attended other online classes, including Managing Emotions in the Workplace, Customer Service Skills, SharePoint, Personal Security Awareness, and OneDrive.

LinkedIn Learning, Metropolitan's online, e-learning content platform, was used for 39 classes, including topics on Construction Risk Management, Impromptu Speaking, Persuading Others, Project Management Foundations, and Time Management Fundamentals.

Objective #2 Seek diverse, high-quality talent, and establish partnerships to discover additional outreach opportunities that aid in staffing positions.

Recruitment successfully filled six positions for the month of September. We received 31 new staffing requisitions resulting in 134 positions currently in recruitment. Recruitment uses a process that allows virtual interviewing using Zoom.

In September, the Diversity, Equity, and Inclusion (DEI) Council heard reports from the subcommittees of the Council and discussed how to proceed while awaiting the naming of the DE&I Officer. The Council reviewed a sample of a listening session that could be used to identify various topics of concern by employees Management would like to see the results of the sessions included in the future DEI strategic plan.

Staff participated in two outreach events, one for high school students interested in Metropolitan's apprenticeship program and the other for college students focused on STEM careers at Metropolitan.

GM STRATEGIC PRIORITY #2: SUSTAINABILITY

Objective #1 Implement employee retention and engagement programs to ensure Metropolitan's investment in employees is supported.

Human Resources continued to monitor state and federal guidance, particularly regarding possible mandatory COVID-19 vaccinations. Biweekly discussions with the bargaining units on COVID-19 issues also continue. The initial proposed October 1, 2021 conversation to a hybrid work environment has now been rescheduled to January 3, 2022, because of safety concerns arising from the on-going COVID-19 pandemic.

HUMAN RESOURCES *continued*

Objective #2 Ensure Metropolitan managers have foundational knowledge, on-going support to effectively manage employees, and the tools to prepare for a changing workforce.

The Organizational Development and Training Unit facilitated the latest session of the WSO Management Specialization Training Program for 13 new Operations managers. This program has been designed to continue leadership development within Operations once new managers have completed the Metropolitan Management University. September's session focused on self-awareness, conflict management, and providing candid feedback to team members. It also involved a homework debrief of several coaching scenarios common for new managers.

Human Resources staff continued to provide one-on-one coaching and mediation services for managers and employees in the developmental areas of confident communication, managing hybrid teams, running inclusive meetings, and stress management.

Since the onset of the COVID-19 pandemic, the Human Resources Group Manager has organized a bi-weekly check-in meeting with all Group Managers focused on sharing the latest information on employee illness or potential exposure, issues raised by the bargaining units, and strategies for working through the complexities of the "stay at home" and masking orders. Staff are also continuing work on "tool kits" for managers and employees to facilitate the eventual return of employees to their regular work locations.

GM STRATEGIC PRIORITY #3: INNOVATION

Objective #1 Continue to upgrade HR's technological capabilities and continue to seek out improved technologies to better serve HR's customers.

HRIS successfully completed the Fluid User Interface project for MyHR. Brown Bag briefings and demonstrations were provided to employees before and after the project went live. In addition, online open enrollment was launched within the new system.

HR CORE BUSINESS: Provide Excellent Human Resources Services

Human Resources provides a wide range of services and support from pre-hire to post retirement care. HR policies, procedures, and practices will be reviewed and revised as appropriate. HR will continually improve service and better utilize technologies.

Objective #1 Administer all HR services with efficiency and a focus on customer service excellence, consistency, and flexibility.

In September, Employee Relations staff briefed the OP&T Committee on the status of MOU negotiations. Staff reported that Metropolitan had secured one-year MOU extensions with both MAPA and ACE. The contracts for both MAPA and ACE contain "favored nations" provisions, which means that MAPA and ACE employees will receive whatever salary and benefit adjustments that are negotiated by either AFSCME or the Supervisors Association. Staff also reported that discussions have taken place with both AFSCME and the supervisors, in hopes of achieving MOU extensions with those two bargaining units as well.

HR Staff, in collaboration with External Affairs, developed a communication campaign that includes an open enrollment video that will launch on September 21, 2021. On September 27, 2021 staff will conduct two virtual webinars to demonstrate the new open enrollment functionality within the MyHR system. Staff will host open enrollment from September 27 through October 18 and provide consultations and assistance to all employees making benefits election changes for calendar year 2022.

HUMAN RESOURCES *continued*

Staff developed a communication campaign to highlight National Retirement Security Month (NRSM) and will launch on September 29. The NRSM event will be hosted during the entire month of October and was passed by Congress to provide education and information to all employees on plan options, investment guidance, and retirement readiness.

On August 25, the Defined Contributions Advisory Committee approved two new environmental, social, and governance funds (ESG Funds) to the 401(k) and 457(b) plans core fund line-up, effective November 1, 2021. HR Benefits is coordinating the adoption of the two new funds, updates to the Investment Policy Statement, creating a communication campaign with Empower Retirement to communicate the availability of the two new funds, and share information about these new funds in an Investment Option webinar in October during National Retirement Security Month.

Staff is continuing to administer the emergency COVID-19 supplemental paid sick leave (SPSL), which is scheduled to expire on September 30, 2021.

HR Benefits is continuing to work with HRIS and Payroll to complete the CalPERS' mandatory audit review on reporting unused sick leave to ensure compliance with converting it to additional service credit upon retirement. HR Benefits is also working with our internal Audit Group and KPMG on the annual pension data audit to comply with GASB requirements.

HR CORE BUSINESS: Comply with Employment Laws and Regulations

Ensure all policies, programs, and practices comply with ever-changing laws and regulations. Compliance with applicable laws and policies requires monitoring and analyzing changing requirements, determining impact on Metropolitan management and staff, and implementing any changes necessary to maintain compliance. In addition, these changes must be clearly communicated to all customers as necessary, with any needed training provided, as appropriate.

Objective #1 Effectively administer all Human Resources policies, programs, and practices in compliance with applicable federal and state laws and Metropolitan's Administrative Code, Operating Policies, and Memorandum of Understanding.

In September, 12 new workers' compensation claims were received, and 11 were resolved. Five employees remain off work because of an industrial injury or illness. This reflects Metropolitan's effort to accommodate injured workers while enabling them to be productive and remain on the job.

Staff is collaborating with other Metropolitan stakeholders to implement a new Incident Reporting and Case Management System designed by Ventiv Technology.

Staff is in the initial stages of transitioning to a new worker's compensation Third Party Administrator.

Staff also accomplished the following:

- Coordinated medical surveillance exams at four facilities (Hinds, Eagle Mountain, Iron Mountain, and Gene Camp), which included respirator exams, Department of Motor Vehicle exams, and hearing tests.
- Coordinated two random drug tests.
- Arranged eight medical evaluations (DMV and medical surveillance).
- Addressed eight accommodation issues.

HUMAN RESOURCES *continued*

HR Metrics	June 2021	September 2021	Prior Month August 2021
Headcount			
Regular Employees	1,806	1,786	1,792
Temporary Employees	30	34	34
Interns	3	2	4
Recurrents	20	20	20
Annuitants	16	16	16

	September 2021	August 2021
Number of Recruitments in Progress (Includes Temps and Intern positions)	134	109
Number of New Staffing Requisitions	31	6
	September 2021	August 2021
Number of Job Audit Requests in Progress	10	12
Number of Completed/Closed Job Audits	2	0
Number of New Job Audit Requests	0	1

Transactions Current Month and Fiscal YTD (includes current month)			
<u>External Hires</u>	<u>FY 20/21 Totals</u>	<u>September 2021</u>	<u>FISCAL YTD</u>
Regular Employees	74	3	13
Temporary Employees	30	1	9
Interns	3	0	3
Internal Promotions	60	2	12
Management Requested Promotions	149	11	34
Retirements/Separations (regular employees)	78	6	30
Employee Requested Transfers	20	0	1

INFORMATION TECHNOLOGY

GM STRATEGIC PRIORITY #1: RESILIENCY

OBJECTIVE #1 Strengthen Metropolitan’s cybersecurity capabilities by deploying new and emerging technologies, and implementing enhanced security countermeasures

Continued to implement Cybersecurity projects and initiatives to improve Metropolitan’s security posture and to collaborate with stakeholders to further enhance network security capabilities for Metropolitan’s computing environments.

- Provided on-going enhancements to address evolving cybersecurity threats to provide a secure enterprise network security architecture to ensure Metropolitan’s operational reliability as well as operational flexibility to address changing conditions.
- Continued on-going analysis, assessments, and monitoring of IT network and systems to identify potential vulnerabilities and take action to remediate findings.
- Continued to implement cybersecurity tools in the areas of Application Security, Multi-Factor Authentication, and Identity and Access Management to protect Metropolitan against evolving cyber threats.
- Monitored IT network and remote connectivity to ensure secure and reliable service for employees’ teleworking.
- Promoted cybersecurity governance, risk, and compliance to enhance capabilities and mitigate increasing cybersecurity threats to Metropolitan’s business systems and networks.
- Successfully completed migration efforts as part of moving the mailboxes of all Metropolitan employees from our on-premises servers to Microsoft 365 (M365). This effort provides for greater security and integration between Outlook and our existing M365 productivity tools.

OBJECTIVE #2 Manage Information Technology Projects within the Capital Investment Plan to ensure reliability of Information Technology (IT) Systems and Infrastructure.

- Continued to execute IT capital projects in support of Metropolitan’s strategic priorities by replacing end-of-life infrastructure, upgrading applications, and delivering innovative solutions to ensure reliability and resilience of IT systems. Selected project activities include:
 - **Maximo Upgrade Project**—The project team successfully completed Metropolitan’s enterprise-wide maintenance management software application (Maximo) used for planning, scheduling, and reporting of required maintenance of equipment deployed throughout the treatment plants, and the conveyance and distribution system. IT started post-deployment support and will continue to provide WSO with on-going customer-requested enhancements.
 - **Budget System Replacement**—Upgrade Metropolitan’s budgeting system to support the capital and O&M budget processes and Board deliverables. IT continued to support the CFO Office as the system went live and budget coordinators began using the new system for biennial budget development.
 - **Desert Microwave project**—The scope of this project is to upgrade desert microwave tower sites by replacing end-of-life equipment and providing sufficient capacity and reliability to Metropolitan’s wide area network in the desert region. The team continues to work on the procurement phase of the project while conducting required frequency coordination involving FCC licensing.
 - **Enterprise Data Analytics**—The scope of this project is to develop a data and analytics strategy, create implementation best practices, and engage Metropolitan stakeholders on a technology blueprint to serve the data analytics needs of Metropolitan business groups. Staff initiated Phase One of the project to define data analytics objectives, complete gap analysis, develop the data and analytics strategy, create implementation best practices and engaged Metropolitan stakeholders and management to ensure that requirements are identified.

INFORMATION TECHNOLOGY *continued*

OBJECTIVE #3 Modernize Operational Technology and Control System Upgrades as part of the Capital Investment Plan.

- Automated Meter Reading (AMR) Upgrade—The AMR project will address equipment obsolescence as the current communication equipment used in the system is approaching end-of-life. Staff continued with the definition phase of this project by evaluating design alternatives and technologies, including pilot testing of four radio frequency technologies for the AMR project.
 - Continued to partner with WSO on installation of field equipment and testing at selected Metropolitan sites as part of assessing effectiveness of design alternatives using different frequency technologies.

OBJECTIVE #4 Improve Metropolitan's IT Disaster Recovery and Response Capability.

- Conducted IT Disaster Recovery (ITDR) Business Continuity testing as part of preparedness planning and to simulate recovery of selected applications defined by the Business Continuity Program. Testing commenced on September 20 involving business owners as part of training and continuous improvements based on prior exercises and on-going enhancements. ITDR exercises help validate Metropolitan's recovery capabilities in the event of a disaster.

OBJECTIVE #5 Provide leadership, planning, and solutions in support of Metropolitan's Strategic Priorities.

- Metropolitan's data center modernization project provides enhanced operational uptime of data center processing to meet current and future capacity and reliability needs. The secondary data center site relocation was completed last fiscal year and is strategic to ensuring recovery capabilities are in place before moving the primary site.
- Primary Site—The project team continues to work on the procurement and development phase while refining a comprehensive plan that must address logistical challenges associated with migrating hardware, software, data, communication networks, and ancillary systems. The work is highly complex and must be done while current systems and resources continue to support Metropolitan's day-to-day business operations.
- Preparations are underway for staff to seek board approval for a contract amendment associated with upcoming work at the primary site and to provide an update on the overall data center modernization effort.



Datacenter at an undisclosed location

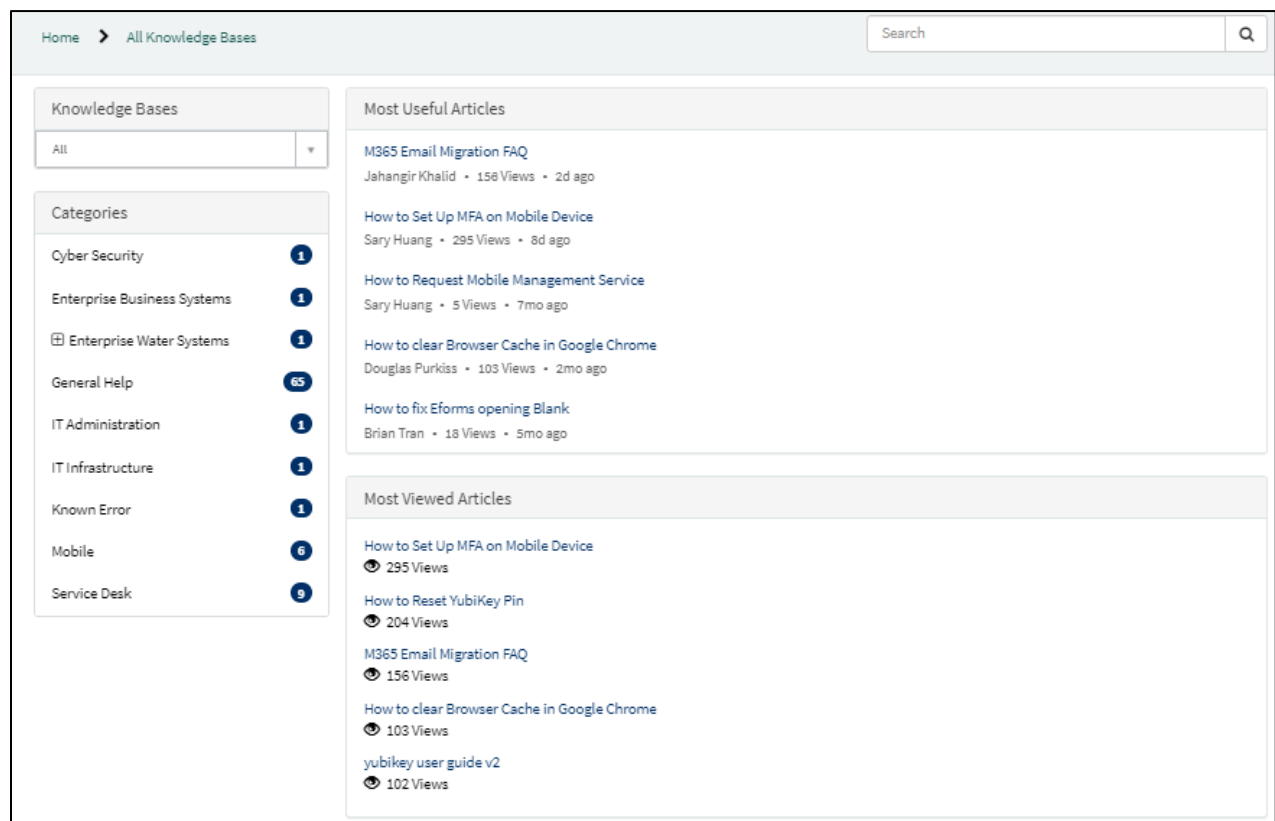
INFORMATION TECHNOLOGY *continued*

OBJECTIVE #6 Deploy solutions to improve operations, promote collaboration, and provide business value.

- Collaborated with Administrative Services Section staff on the Enterprise Content Management (ECM) project that assists Metropolitan's regulatory compliance requirements to manage both paper and electronic records. ECM will provide the framework for collaborative, automated workflow of document-centric processes. Current efforts focus on optimizing existing digital data and cleanup of network storage drives in preparation for the migration phase of the project.

OBJECTIVE #7 Enhance workforce productivity by simplifying access to business information and deploy technologies to support our customers in making business decisions.

- As part of the IT Service Management (ITSM) project, IT successfully deployed new service desk software to centralize and modernize service management within the Information Technology Group. This service desk tool provides a self-service portal for work requests and improves operational reporting capabilities. Since the deployment of ITSM, continuous improvements have been made in the area of operational reporting as well as building out a knowledge base. The availability of the Knowledge Base provides self-service online library of information pertaining to general information as well as specific knowledge base references to assist users with general questions, useful articles, and "how-to." The knowledge base is searchable by various topics, by subject matter, or by various IT categories.



Knowledge Base

INFORMATION TECHNOLOGY *continued*

GM STRATEGIC PRIORITY #2: SUSTAINABILITY

OBJECTIVE #1 Provide IT services in support of the Headquarters Improvements Program.

- IT resources continued to provide support and services for the Headquarters Improvements Program related to physical security enhancements as well as integrating security requirements with IT systems and infrastructure.

OBJECTIVE #2 Manage Information Technology Projects within the Capital Investment Plan to ensure sustainability of IT Systems and Infrastructure.

- Continued efforts to upgrade the Fuel Management System that enables management controls over fuel inventories, dispensing, and security to ensure operability, vendor support, and system reliability. With the recent project kickoff, the team is in the process of conducting site visits at 13 fleet facilities to gather information needed for project plan development and to identify site-specific requirements.

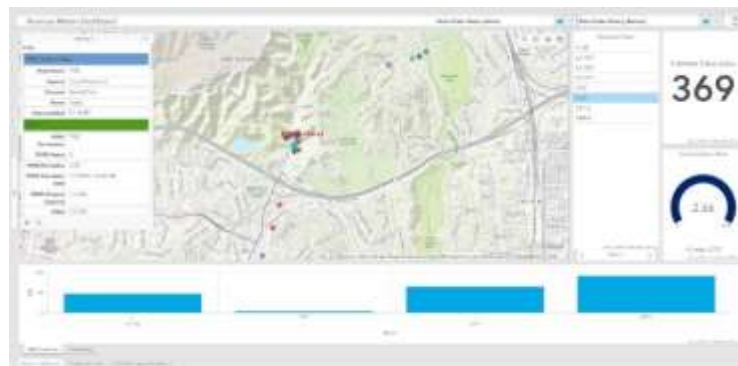
GM STRATEGIC PRIORITY #3: INNOVATION

OBJECTIVE #1 Strengthen Metropolitan's cyber security capabilities by deploying new and emerging technologies and implementing enhanced security countermeasures.

- Elements of the Security Operations Center (SOC) project are underway to implement new countermeasures to protect Metropolitan's computing infrastructure. For example, a new security Information and Event Monitoring system for the SOC will allow Metropolitan to efficiently detect and respond to attacks using automated tools that collect and correlate events for incident detection and response.
- Project details and updates are made to the Board quarterly and in closed session. The next cyber security briefing is scheduled for October.

OBJECTIVE #2 Manage Information Technology Projects within the Capital Investment Plan to ensure sustainability of IT Systems and Infrastructure.

- Completed the upgrade for the board and committee rooms' audio/visual (A/V) equipment by replacing the end-of-life A/V equipment. In the prior period, the project team conducted final user acceptance testing and trained key personnel and support staff on the new system. The system has been turned over to the IT Infrastructure Services for on-going support and maintenance.
- IT continued to partner with key stakeholders on the implementation of an Asset Management System to leverage data already maintained by Metropolitan into a common framework, which will serve as a foundation for future infrastructure reliability projects and assessment across Metropolitan.



Development and Pilot Testing

INFORMATION TECHNOLOGY *continued*

OBJECTIVE #3 Modernize Operational Technology and Control System Upgrades as part of the Capital Investment Plan.

- Continued the capital improvement project to upgrade Metropolitan's Supervisory Control and Data Acquisition (SCADA) system to ensure the continued reliability of the system-wide control system by addressing cybersecurity and technology obsolescence risks. During the period, staff continued to work with key stakeholders on the RFP phase of this project.

OBJECTIVE #4 Provide Leadership, planning, and solutions in support of Metropolitan's Strategic Priorities.

- Provided leadership and governance by holding meetings with the IT Executive Council and Operation Technology Governance Committee. In September, the IT Group held demonstrations showcasing innovative technologies being deployed to business users as well as providing updates on key IT initiatives that support Metropolitan's strategic priorities.
- Maintained Metropolitan's move to the cloud by partnering with business owners to migrate selected virtual servers and applications to Microsoft's Azure Cloud. In addition, similar efforts are on-going to migrate other applications to the Oracle cloud environment. A key benefit of these migrations (servers and databases to the cloud) has allowed for the decommissioning of legacy servers and those that have reached end-of-life (and will no longer need to be replaced). Other benefits include reducing Metropolitan's physical server footprint, risk profile, and potential vulnerabilities associated with legacy hardware and operating systems.



Migration to the Cloud

OBJECTIVE #5 Deploy innovative solutions to improve operations, promote collaboration, and provide business value.

- Staff continued to use unmanned aerial vehicles to support Metropolitan's key business objectives, including infrastructure and property inspection, environmental land monitoring, and videos for educational and promotional events. In addition to processing and analysis of the data collected from prior missions, staff partnered with business units on requirements and the development of flight plans for upcoming missions.

OBJECTIVE #6 Enhance workforce productivity by simplifying access to business information and deploy technologies to support our customers in business decisions.

- Enhancing workforce productivity and simplifying access to business information requires a close partnership between users and IT. During the period, IT resources continued to support business users on pilot testing and conducting proof of concept to demonstrate the value of automation and ways to leverage technology. An example of such partnership includes the development of a mobile application (Survey 123) for ESG, along with mobile applications being developed for other business units. Similar efforts are underway to explore innovative solutions while improving operations, promoting collaboration, and providing business value.

REAL PROPERTY

GM STRATEGIC PRIORITY #1: Resiliency

Objective #1 Provide right-of-way planning, valuation, and real property acquisition support services for the protection and reliability of existing infrastructure.

Acquired a 22-month Temporary Construction Easement from a private owner in Brea, CA. This easement is for construction and staging purposes in order to perform erosion protection on a blow-off structure on the Orange County Feeder pipeline for the Orange County Operating Region of the Right-of-Way and Infrastructure Protection Program.

DVL-12 surplus property totaling ± 223 acres was sold to a private entity. The property was originally acquired in the mid-to-late 90s as a construction laydown area for the Diamond Valley Lake Reservoir Project. Metropolitan reserved necessary permanent easement over a portion of the sold property for potential future use.

Objective #2 Foster staff training and development.

The Right of Way Professional (RWP) certification from the International Right of Way Association (IRWA) was received this month. This demonstrates the aptitude to understand, communicate, and perform within standards of the right of way profession. This certification and the education required in achieving it enables the Real Property Group the ability to participate and resolve complex Metropolitan real estate-related projects.

Attended the Managing the Marginal Employee webinar. This workshop is designed to train supervisors and managers on how to manage such employees.

CORE BUSINESS: Real Property Acquisition, Management and Revenue Enhancement

Objective #2 Provide valuation, land management, and real property disposition support services for the maximum return or use of Metropolitan-owned land and facilities.

A license agreement was entered into with the buyer of the Gilman Springs surplus property for vehicular ingress and egress purposes. The five-year license will allow the buyer to traverse Metropolitan's private road and bridge.

Objective #3 Efficiently maintain and operate assets not related to the treatment and distribution of water.

In preparation for the move of the Security team into the second floor wing, Facility Management completed upgrades to paint and carpet.



Before and After

REAL PROPERTY *continued*

The Diamond Valley Lake Marina Concessionaire hosted the final night fishing tournament of the summer season. A total of over 300 boats and 600 anglers headed out to find a prime location and cast their fishing lines around the lake this summer. The night fishing tournament series rewards fishing teams with the highest total weight, and Diamond Valley Lake (DVL) has been known to deliver a good catch. One of the largest fish caught at DVL was a 47-pound catfish that was reeled in over the Labor Day holiday weekend.



SECURITY MANAGEMENT

GENERAL MANAGER'S STRATEGIC PRIORITY #1: Resiliency

Objective #2 Improve Security and Emergency Response

The Security Management Unit conducted its first full-scale security exercise in preparation for the 20th anniversary of the 9/11 terrorist attacks. Although our local or federal law enforcement partners indicated there were no specific, credible security threats to critical water infrastructure, Metropolitan security chose to proactively present a strong, visual display of protective deterrence along critical Colorado River Aqueduct (CRA) areas to dissuade any potential threats.

Before the September 11 weekend, a short-notice operation order rapidly deployed extra guard staff, special agents, and additional security vehicle patrols to the five pump plants along the CRA for 72 continuous hours. Contract guard forces quickly mobilized from various locations all over Southern California to meet operational staffing requirements and rendezvous at various CRA locations. California Highway Patrol and local law enforcement provided additional liaison support. Additional special agents and contract guards conducted extended patrol operations at select water treatment plants and other facilities in Los Angeles, Orange, and Riverside Counties.

To maintain districtwide situational awareness, the Security Watch Center issued shift change situational reports and worked with Emergency Operations Control (EOC) duty officers to maintain an accurate, common operating picture on WebEOC.

The exercise also evaluated important administrative components, such as safety, logistics, communications equipment, contracting, supplies, PPE, COVID-19 protocols, EMS responses, berthing, and vehicle support services. This successful exercise proved invaluable in evaluating contract security capability to rapidly field extra guard capacity and successfully operate in desert conditions should an actual water-sector security threat occur.



Metropolitan Special Agents, along with security contractors and law enforcement, patrol CRA and pump plants over the 9/11 weekend.

SECURITY MANAGEMENT *continued*

Objective #2 Improve Security and Emergency Response

A recent assessment by the US Department of Homeland Security (DHS) Cybersecurity and Infrastructure Security Agency (CISA) found that “more than 2 million people report some type of workplace violence each year, with approximately 25 percent of workplace violence going unreported.”

As part of a strong prevention support strategy, the Security Management Unit staff participated in specialized training geared to avert and mitigate potential workplace violence. The training, provided by a licensed clinical and forensic psychologist, prepares Human Resources, Legal, and Security staff to recognize, mitigate, contain, and manage potential threats of targeted violence and violent behaviors in the workplace.

For employees, CISA recommends using the OHNO approach (Observe, Initiate a Hello, Navigate the Risk, and Obtain Help) to assist in observing and evaluating suspicious behaviors. It empowers employees to mitigate potential risks or get help when needed. More information on the OHNO approach can be found at:

www.cisa.gov/employee-vigilance-power-hello



CISA's OHNO approach

Objective #3 Improve Employee Readiness for All Hazards Emergencies

September is National Preparedness Month, and September 25 has been designated as National “If You See Something, Say Something®” Awareness Day, also known as #SeeSayDay. The “If You See Something, Say Something®” campaign works with partners year-round to empower and educate the public on suspicious activity reporting.

An informed and alert public plays a critical role in keeping our nation and communities safe. By learning the indicators of terrorism-related crimes, paying attention to our surroundings, and reporting suspicious activity to local law enforcement, we can help keep our workplace safe, too. This campaign compliments the various security training programs (Personal Security Awareness, Vagrancy Awareness, and Stop The Bleed training) provided to Metropolitan’s employees.



“If You See Something, Say Something®” Awareness Day is September 25

WATER RESOURCE MANAGEMENT

GM STRATEGIC PRIORITY #1: Resiliency

Objective #5 Ensure reliable State Water Project (SWP).

Staff participated virtually in the DWR Operations, Maintenance, and Engineering Committee (OME) meeting. DWR staff provided SWP contractors with updates from the Southern Field Division and the California Aqueduct Subsidence Program. They also provided an update on the emergency repair on the California Aqueduct upstream of San Luis Reservoir (mile 54.95), where a 500 gallon per minute (gpm) leak was detected on August 10, 2021. Repair work is expected to be completed by early October. Because of the low SWP allocation, no water deliveries have been affected by the disruption to the aqueduct.

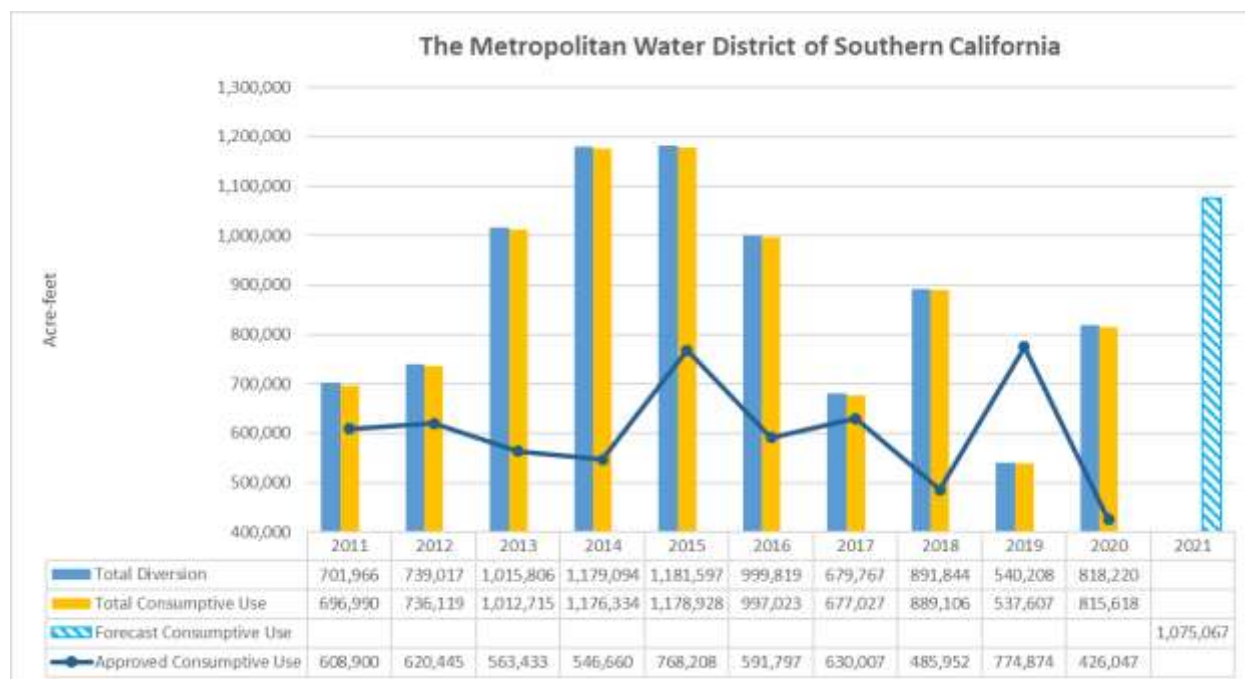


California Aqueduct Repair (mile 54.95)

Objective #6 Ensure access to sufficient water supplies to operate a full Colorado River Aqueduct in times of drought.

Staff submitted Metropolitan's 2022 Colorado River Diversion Request, formally known as the 2022 Colorado River Diversion Estimate and Part 417 Consultation Questionnaire, to the U.S. Bureau of Reclamation (Reclamation). Participating in Reclamation's Part 417 consultation process helps ensure full access to the available Colorado River supplies in the calendar year 2022. This request includes all transfer water and water that becomes available through the Colorado River priority system. For 2022, staff submitted an estimated total diversion amount of about 601 thousand acre-feet. The figure below provides a historical record of Metropolitan's diversions and consumptive use of Colorado River water for calendar years 2011–2020 and Metropolitan's forecasted consumptive use for 2021.

WATER RESOURCE MANAGEMENT *continued*



**Historical record of Metropolitan's diversions & consumptive use, 2011–2020.
Forecasted 2021 consumptive use as of September 7, 2021.**

Staff reviewed three drafts of Reclamation's *Annual Operating Plan for Colorado River Reservoirs 2022* (AOP) that reports on past operations of the Colorado River reservoirs for the last calendar year, as well as projected operations for these reservoirs for the upcoming year. Staff also participated, along with other stakeholders of the Colorado River basins, in three webinar consultations for each of the draft AOP to provide comments and feedback to Reclamation. The AOP is important to Metropolitan's operations since it confirms the parameters that will govern the operations of Lake Powell and Lake Mead in the subsequent year. Reclamation declared the first-ever shortage on the Colorado River for the calendar year 2022, and the latest draft AOP outlined that a Shortage Condition will govern the operation of Lake Mead, which influences management of Metropolitan's available supply and Intentionally Created Surplus (ICS) on the Colorado River.

Staff attended a meeting of the Colorado River Basin Salinity Control Forum (Forum) Work Group, which supports the Forum with technical analysis. The Work Group heard program updates from federal partners, including the Bureau of Land Management, the Natural Resources Conservation Service, and the U.S. Geological Survey. The Work Group discussed the schedule and required work for the upcoming 2023 Review of Water Quality Standards for Salinity in the Colorado River. The Work Group also heard a report from Reclamation on the status of salinity control in the Paradox Valley, including a progress update on Reclamation's seismic risk and hazard analysis, and the prospects of returning to service the existing Paradox Valley Unit injection well, which has not operated consistently since the March 2019 earthquake in the valley.

Staff attended several Colorado River Basin States meetings, including meetings of the Lower Basin States, California-only meetings, and several technical working group meetings. The main purpose of the meetings was to begin planning a range of additional measures that can be implemented during the interim period (2022–2026) to slow or halt the decline of Lake Mead elevations during ongoing dry conditions in the basin. These discussions were prompted, in part, by the first-ever Level 1 shortage declaration on the river in August and the projection that, under minimum probable conditions, Lake Mead elevations could fall below elevation 1030' within the next 24 months. Working group meetings focused on developing the range of options and strategies for supporting Lake Mead and the environmental compliance measures required to implement a plan.

WATER RESOURCE MANAGEMENT *continued*

Objective #8 Implement Local Resources Program

Metropolitan staff held a Local Supply Workgroup with member agencies to discuss recycled water end-user issues. Representatives from 19 member agencies attended the meeting. A second Local Supply Workgroup will be held in the future with a different focus. The feedback from the meetings will help guide program development of the Local Resources Program and the On-Site Retrofit Program.

GM STRATEGIC PRIORITY #2: Sustainability

Objective #3 Monitor development of climate science and incorporate updated information into Integrated Water Resources Planning approach.

Staff continued to engage with expert consultants in the field of climate change. The IRP climate expert panel held its seventh and eighth meetings on September 2 and September 27 to review how their input had been incorporated into the IRP's modeling assumptions and to discuss climate-related indicators appropriate for data tracking and continued analysis as part of Metropolitan's adaptive management planning.

Objective #8 Implement Regional Conservation Program.

In response to the Water Supply Alert declaration in August, Metropolitan staff continued to perform outreach activities to promote water conservation. Conservation outreach activities include the following:

- Participating as a panel member at the Association for Women in Water, Energy, and the Environment panel titled "Our Thirsty State." Discussion included conservation strategies for homeowners, innovations in conservation, and common myths and misconceptions.
- Holding a webinar on picking California Friendly plants in conjunction with SoCalGas,
- Presenting information on Metropolitan's rebates and programs to the So Cal Rental Housing Association. The presentation focused on incentives from multi-family housing programs because the audience in this meeting consisted mainly of property managers, building owners, and realtors.

Metropolitan staff held a quarterly Program Advisory Committee (PAC) meeting with conservation coordinators from the member and retail agencies. The PAC meets quarterly to discuss Conservation Program issues, provide feedback on existing programs and policies, and offer recommendations to staff on program modifications. Topics of discussion from the meeting included a proposal for Metropolitan to aid member and retail agencies with funding to measure areas served by dedicated irrigation meters in order to comply with the Water Conservation Framework legislation (SB 606 and AB 1668), and expressing support for enhanced incentives for certain outdoor irrigation devices and/or modifying quantity thresholds to increase consumer participation. Staff will evaluate PAC recommendations and provide recommendations to management for consideration.

GM STRATEGIC PRIORITY #3: Innovation

Objective #1 Adaptively Prepare for a Range of Possible Futures through the Incorporation of Scenario Planning in the IRP.

Staff continued to engage with member agencies and the board on work for the 2020 IRP. The Board IRP Special Committee met on September 28. Meeting topics were focused on an update on improvements to the IRP scenario refined analyses presented in July, takeaways from the scenario gap analyses, preliminary recommendations based on these findings, and next steps for the IRP process.

WATER RESOURCE MANAGEMENT *continued*

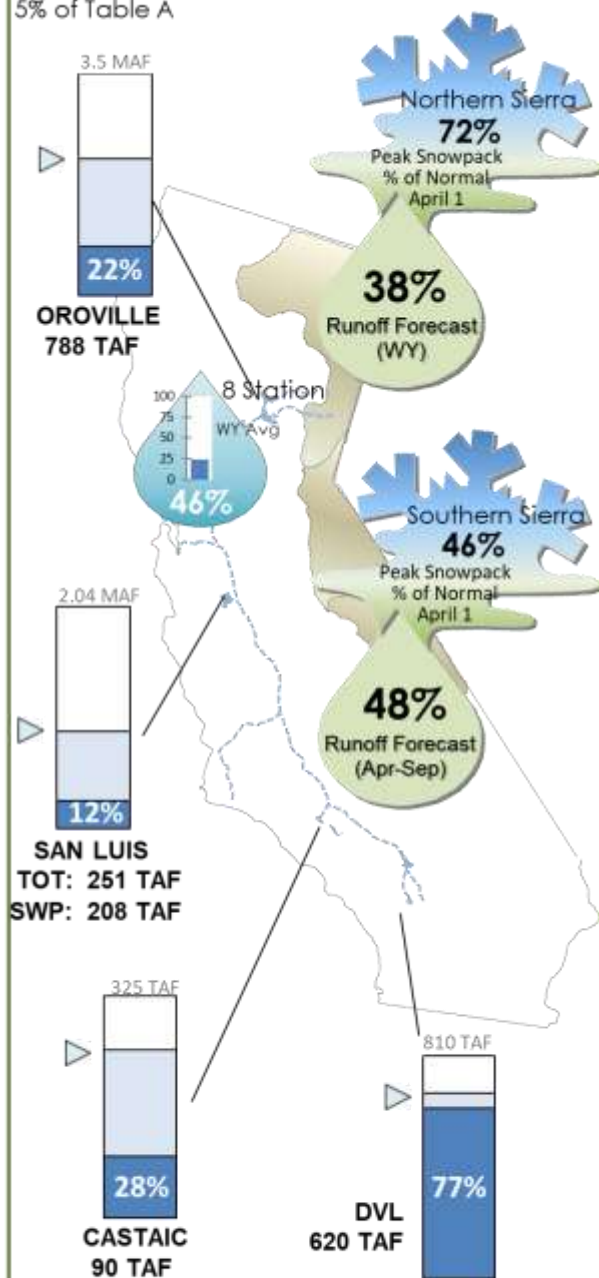
Objective #3 Implement Future Supply Actions Funding Program.

Metropolitan staff from WRM and External Affairs hosted a Future Supply Actions (FSA) Program webinar on September 15 on the findings of a study on an innovative approach for meeting reservoir augmentation regulations for potable reuse. The study examined using preformed chloramines (a disinfectant) to eliminate or minimize the formation of trihalomethanes (THMs) during advanced water treatment. This research project demonstrated that the preformed chloramines approach can be a simple, cost-effective solution to comply with regulatory limits for THMs for surface water augmentation with advanced treated recycled water. The findings of the study have led to the decision to incorporate the use of preformed chloramines in a full-scale advanced water treatment plant design. Metropolitan co-funded this study through its FSA Program. The San Diego County Water Authority and its study partner, Padre Dam Municipal Water District, led the study and presented the findings in the webinar.

WATER RESOURCE MANAGEMENT *continued*

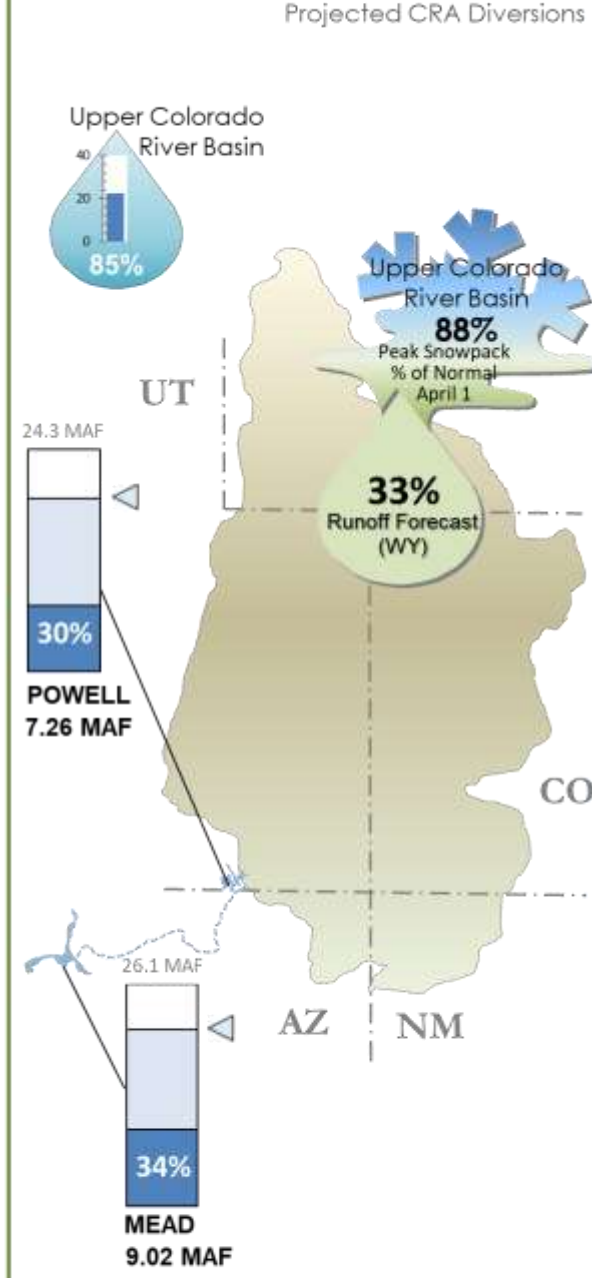
2021 SWP Allocation

95,575 AF
5% of Table A



2021 Colorado River

1,076,000 AF
Projected CRA Diversions



As of September 30, 2021

WATER SYSTEM OPERATIONS

GM STRATEGIC PRIORITY #1: Resiliency

Objective #1 Provide Reliable Water Deliveries.

Metropolitan delivered approximately 150,971 acre-feet (AF) of water to member agencies in September. Deliveries averaged approximately 5,032 AF per day, which was 426 AF per day lower than in August. Treated water deliveries decreased by 10,071 AF from August with a total of 83,986 AF or 56 percent of total deliveries for the month. The Colorado River Aqueduct (CRA) continued at seven-pump flow with a total of 96,230 AF pumped for the month. State Water Project (SWP) imports averaged 1,509 AF per day, totaling about 45,274 AF for the month, which accounted for about 30 percent of Metropolitan's deliveries. The target SWP blend remained at zero percent for the Weymouth, Diemer, and Skinner plants.

Objective #2 Ensure Water Quality Compliance, Worker Safety, and Environmental Protection.

Metropolitan complied with all water quality regulations and primary drinking water standards during August 2021.

Staff completed sensory training for the Flavor Profile Analysis (FPA) program. The FPA program ensures that Metropolitan's treated water is pleasant to taste and smell and is used to assess the impact of taste and odor events in source waters.

The Weymouth plant and the Palos Verdes Reservoir have wastewater discharges that are permitted by the Los Angeles County Sanitation Districts (LACSD). Both facilities received Certificates of Recognition from LACSD for complying with the United States Environmental Protection Agency (USEPA) and the LACSD industrial wastewater discharge permit limits and requirements in 2020. The Certificates of Recognition acknowledge that all required sampling was performed, all effluent limits were met, all required compliance reports were submitted on time, and no violations were issued during the year.



Certificates of Recognition for the Weymouth plant and Palos Verdes Reservoir for meeting industrial wastewater discharge permit requirements

Staff successfully renewed the Mills plant Industrial Wastewater Discharge Permit with the City of Riverside Department of Public Works—Wastewater Division. The City of Riverside conducted a site inspection of the Mills plant before issuing the final permit, which is valid for three years and expires on July 31, 2024.

WATER SYSTEM OPERATIONS *continued*

Objective #3 Actively Engage in Capital Project Planning and Execution.

The Sepulveda Canyon hydroelectric plant (HEP) was originally put into service in 1980 and has a capacity of 8 megawatts of power. Since then, only minor touchups to the coatings were performed on the tailrace portion of the HEP. Through periodic inspections and evaluation, a complete recoating of the tailrace was determined necessary to protect the internal surfaces and restore efficiency. Staff removed approximately 8,000 square feet of 40-year old coatings and prepared the surfaces to the highest standard for new coatings application. This project included application of high-performance epoxy-based coatings to the tailrace chamber walls, needle valves and all carbon steel surfaces. This infrastructure improvement project will prolong the life of the Sepulveda Canyon HEP.



Tailrace before (left) and after (right) coating work at Sepulveda Canyon HEP

Staff prepared a laydown area at Lake Mathews to temporarily store several large valves that will be used for the PCCP pipe rehabilitation project. These valves were purchased in advance to ensure availability to meet project schedule and future shutdowns. Staff procured, processed, and installed 700 tons of base rock to provide a solid foundation for the large valves that weigh approximately 72,000 lbs. each.



Motorgrader prepping subgrade (left) and receiving aggregate base material (right) at Lake Mathews

Objective #4 Optimize Maintenance.

Staff is preparing a pump unit for coating repair at the Eagle Mountain pumping plant. The pump packing on the unit allows water to seep through to keep the packing cool but also results in corrosion over time as the coating deteriorates. Staff will prepare and re-coat this pump headcover to ensure reliable service.

WATER SYSTEM OPERATIONS *continued*



Pump headcover prepared for coating repairs at Eagle Mountain pumping plant

Desert staff maintains the access roads along the aqueduct as well as at other facilities. Road work is being done at Copper Basin as daily use and monsoonal storms have required significant repairs.



Road repair work at Copper Basin

Staff installed a new 130VDC station battery bank system at Eagle Mountain pumping plant. This project was scheduled to be completed during the 2021 CRA Shutdown, but materials were delayed because of COVID-19 supply chain issues. Staff installed a new transfer switch, wiring, chargers, and battery bank rack.

WATER SYSTEM OPERATIONS *continued*



New station battery bank charger at Eagle Mountain pumping plant

As part of CRA pumping plant preventative maintenance, the pump bowl and impeller were inspected. Staff also replaced the packing while performing the pump bowl inspection.



Staff performing annual pump bowl inspection

Desert pumps require constant cooling and lubrication to function efficiently. A failure of the cooling or lubrication systems can cause shutdowns and potential damage. Desert staff are working with engineering on oil level monitoring systems for a unit at Intake pumping plant that recently showed indications of faulty operation. This collaboration uses strengths from multiple crafts to find the best possible solution for system reliability.

WATER SYSTEM OPERATIONS *continued*



Desert staff calibrating a pump unit's oil instrumentation at Intake pumping plant

During a routine inspection of a canal section along the CRA, staff identified a void adjacent to the concrete liner. Staff filled the void with a concrete slurry to properly support the canal liner and to ensure that it does not get larger. Canals make up more than 62 miles of the aqueduct and cross the desert floor at a constant slope designed for water to flow at 4.5 feet per second.



CRA staff filling voids with concrete slurry near the canal liner

WATER SYSTEM OPERATIONS *continued*

Staff replaced corroded piping on one of the station air compressors at Eagle Mountain pumping plant. The station air system is used for maintenance and equipment operation and is essential in cleaning carbon and dust from commutators, slip rings, and circuit breakers.



Staff replacing corroded air compressor piping at Eagle Mountain pumping plant

Staff installed a new stainless-steel bypass line at the De Soto Valve Structure on the West Valley Feeder No. 1. Bypass lines are used for filling operations after maintenance and reduces wear on the large and more expensive isolation valves.



Staff welding bypass pipe (left) and completed installation of bypass line (right) at the De Soto Valve Structure

WATER SYSTEM OPERATIONS *continued*

Staff repaired the road access to structures that monitor reservoir seepage along the north side of Lake Mathews. Staff also raised the elevation of the accessway structures to keep rainwater and debris from entering the structure and placed base material to provide all-weather access.



Staff installing accessway ring (left) and installed accessway and gravel (right) at Lake Mathews

Staff performed maintenance at Etiwanda hydroelectric plant (HEP). This work included cleaning the air coolers used to remove heat from the generator during operation and verifying and adjusting needle valves used to control flow into the turbine for power output. Staff also performed high-voltage maintenance and testing in the switchyard.



Staff removing air coolers with an overhead crane lift at Etiwanda HEP

WATER SYSTEM OPERATIONS *continued*



Etiwanda HEP needle valve inspection



Staff testing the main transformer of the 66kV switchyard at Etiwanda HEP

WATER SYSTEM OPERATIONS *continued*

This month, staff released Red Mountain HEP for regular operations marking the completion of rehabilitation and recommissioning efforts on the 35-year-old 5.9 MW turbine-generator. The rehabilitation work included reconditioning and refurbishing the turbine, generator, lubrication, and cooling water system. The work also included reconditioning of the upstream and downstream isolation valves and associated hydraulic operator system.



Red Mountain HEP reconditioned generator rotor and stator

Excess buildup of filter media in the Diemer washwater reclamation plant caused one row of flocculators to fail. The media buildup was caused by frequent filter backwashing caused by air entrainment in the source water. Staff was unable to remove the plant from service to perform the needed cleaning and repairs because of high treatment plant flow. Staff used a vendor to remove the filter media from the washwater reclamation plant while the plant remained in service. Safety plans and procedures were in place to ensure the safety of the contractor at all times. Metropolitan staff then made repairs to the flocculator to return the process to normal operation.

WATER SYSTEM OPERATIONS *continued*



Filter media buildup on wastewater reclamation plant flocculator at the Diemer plant

Staff replaced aging instrumentation at Santiago Tower at the OC-11 service connection to include water level monitoring equipment, flow monitoring, turbidity, and dissolved oxygen instruments. These instruments are critical to the control of water flow on the Lower Feeder and provide information on source water quality. Work was carried out while maintaining safe proximities to a major cellular antenna array at OC-11.



Water level monitoring at Santiago Tower for operational control on the Lower Feeder

WATER SYSTEM OPERATIONS *continued*



Fifty-year-old water level monitoring equipment before replacement at the OC-11 service connection



Installed OC-11 monitoring equipment

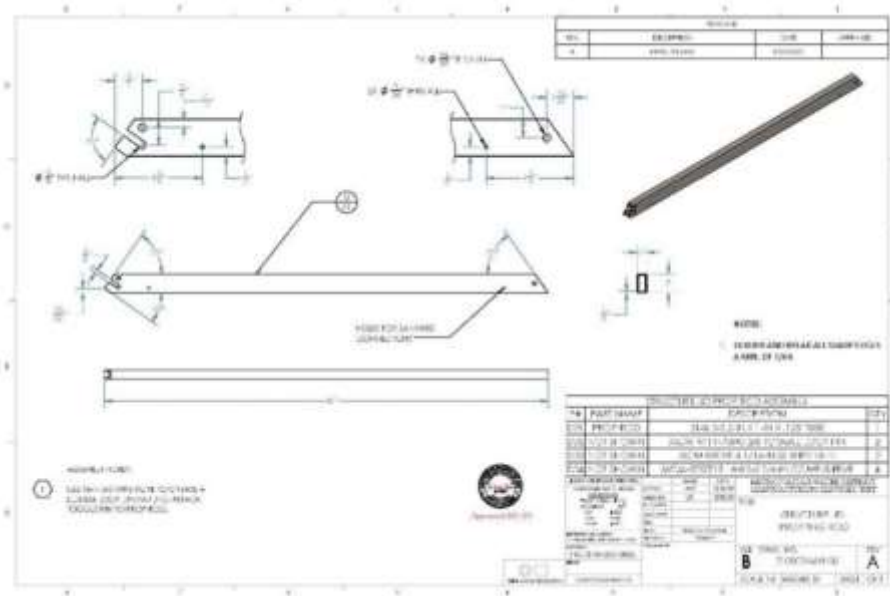
Staff performed troubleshooting and repaired a hydraulic power pack motor control circuit at the Mills plant. The electrician identified a damaged set of electrical contacts in a control relay which was causing a failure of the system. The hydraulic power pack is used to build hydraulic pressure to operate a large valve which allows water to flow into the Lake Mathews HEP located in the city of Riverside.

WATER SYSTEM OPERATIONS *continued*



Staff ensures terminals are properly torqued at the Lake Mathews HEP

To perform preventive maintenance on our infrastructure, which includes lubricating and exercising valves, staff frequently enter and exit valve structures. To safely keep the valve structure open, staff designed a new tool to be fabricated in-house. The development of this innovative tool was a result of a collaboration between operations and engineering staff, as well as the Labor Management Safety Committee. Drawings and fabrication plans are complete, and the new propping rod will soon be available in Metropolitan's warehouse inventory for use by staff to support maintenance work within Metropolitan's water system.



Staff designed an innovative tool to enhance safety during valve maintenance

WATER SYSTEM OPERATIONS *continued*



New propping rod for use on valve structure lids in the distribution system

Staff replaced four aging underdrain pumps in two structures on the Perris Bypass Pipeline near Lake Perris. Groundwater levels in this area are relatively high and require monitoring and the use of an underdrain system to protect the pipeline by drawing water away from it. The water removed is not wasted and is pumped into the CRA via a seepage conveyance pipeline. Staff also completed coating of a valve structure on the Perris Bypass Pipeline following replacement of the valve.



Staff replacing a pump in the underdrain structure on the Perris Bypass Pipeline

WATER SYSTEM OPERATIONS *continued*



Staff installing a pump in underdrain structure on the Perris Bypass Pipeline



Perris Bypass Pipeline valve structure before coating

WATER SYSTEM OPERATIONS *continued*



Perris Bypass Pipeline valve structure after coating

Objective #5 Manage the Power System.

On September 13, staff participated in a virtual stakeholder meeting discussing the California Independent System Operator's (CAISO's) rationale for canceling the proposed modifications on PRR-1280. The meeting was hosted by CAISO stakeholder affairs, and CAISO staff indicated that future changes to CAISO's Resource Adequacy program should be expected. Staff will continue to engage with CAISO to ensure that Metropolitan's interests are protected.

Staff identified a forecasted resource adequacy shortfall of approximately 15 megawatts to support CRA pumping operations in November 2021. The forecasted shortfall is due to continued high CRA pumping operations caused by the low SWP allocation, and reduced capacity at Hoover and Parker Dams is due to low water levels and annual scheduled maintenance. A Request for Offer (RFO) was issued by Metropolitan's scheduling coordinator, AEPCO, for capacity to make up the forecasted shortfall. An RA purchase agreement with two suppliers was approved and executed on September 17, which helps to ensure continued reliable CRA operations.

Objective #6 Improve Emergency Preparedness and Response.

During the last month, staff from various groups collaborated to plan for future return-to-workplace activities related to the COVID-19 pandemic response. In an abundance of caution, staff are coordinating to prepare for possible events related to the planned return of additional staff to Metropolitan work sites. Staff have been meeting regularly to coordinate planning efforts, attending professional panels, and designing response training exercises. Staff also continue to reach out to external emergency management partners to ensure that Metropolitan's planning is in sync with local and state planning efforts.

On September 21, the Water Quality Incident Command Post conducted an exercise focused on cybersecurity. Many of Water Quality's instruments, electronic data storage, and regulatory compliance reporting functions depend on reliable and robust computer resources; therefore, it is critically important to protect these resources and develop a response to potential cyber threats.

WATER SYSTEM OPERATIONS *continued*

Objective #7 Optimize Water Treatment and Distribution.

The State Project water (SPW) target blend entering the Weymouth and Diemer plants, and Lake Skinner was zero percent in August 2021.

Flow-weighted running annual averages for total dissolved solids from August 2020 through July 2021 for Metropolitan's treatment plants capable of receiving a blend of SPW and CRA water were 570, 569, and 570 mg/L for the Weymouth, Diemer, and Skinner plants, respectively.

Staff completed work on the new plant influent water quality building at the Jensen plant. To ensure that the influent water quality parameters are stable, staff monitor the pH, TOC, DO, and turbidity. The new building will house the Remote Terminal Unit (RTU) that was previously located in the LA-35 turnout structure, the Jensen plant Accusonic flow meter, and the LA-35 automatic meter reading (AMR) cabinet. Most of this equipment was previously exposed to the elements and required significant amount of maintenance to keep them operational. This past month, staff installed the new RTU and relocated all of the equipment. The new analyzers are more reliable, safer to access, and will have lower maintenance costs associated with their upkeep.



Staff relocating the RTU at the Jensen plant

WATER SYSTEM OPERATIONS *continued*



Staff configuring new analyzers inside the water quality building at the Jensen plant

Objective #8 Manage Water Reserves.

Water reserves continued to be managed according to Water Surplus and Drought Management (WSDM) principles, operational objectives, and the current 5-percent SWP allocation. Deliveries of SWP supply were minimized to preserve SWP Carryover and Flexible Storage. Releases from Diamond Valley Lake (DVL) through PC-1 to connections on the Lakeview Pipeline, as well as the DVL to Mills plant operation, continued in September to conserve SWP use in that area. Returns from the Semitropic and Kern Delta SWP Banking Programs also continued in September. Staff continued Greg Avenue pump operations to minimize SWP usage by about 3,300 AF per month. In addition, staff continued coordination with member agencies shifting their deliveries from SWP connections to Colorado River water connections, when possible. Along with these actions being taken to respond to drought conditions, Metropolitan's record high storage levels at the end of 2020 provide significant water supply reliability in 2021.

Objective #10 Manage Vacancies.

WSO filled four vacant positions in August 2020.

WATER SYSTEM OPERATIONS *continued*

Objective #11 Prepare Employees for New Opportunities.

The Water System Operations Apprenticeship Programs develop and train personnel to become qualified mechanics and electricians responsible for maintaining Metropolitan's water treatment and distribution systems. The Program's hands-on instruction focuses on real-world learning. This month, electrical apprentices studied the National Electrical Code, wiring methods, and grounding/bonding. An electrical apprentice from the Diemer plant demonstrated exothermic welding during lab. This welding technique uses a chemical reaction to connect copper cabling to similar metals by forming a permanent molecular bond that will not loosen or corrode. The process is performed using thermite powder and a graphite mold. Exothermic welding is used extensively when fabricating grounding grids for switchracks and industrial facilities. These types of connections are common throughout Metropolitan's system.



Electrical apprentice applying ignition powder to the graphite mold



Finished connection using exothermic welding

WATER SYSTEM OPERATIONS *continued*

Skinner plant staff proctored a journey-level mechanical practical exam as part of a recruitment process. Staff provided standardized, hands-on exercises for applicants to demonstrate their skills in fabrication, pipe fitting, welding, and precision measurement. The exercises were prepared using the necessary safety equipment, tools, and reference material for a skilled journey-level industrial mechanic to be able to complete the tasks. Mechanical staff observed and scored the applicants on their ability to complete each task as described in the exercise.



Skinner plant staff preparing journey level mechanical practical exercise material

GM STRATEGIC PRIORITY #2: Sustainability

Objective #3 Support the Regional Recycled Water Program

During September, staff finished the third phase of challenge testing at the Regional Recycled Water Advanced Purification Center (RRWAPC) demonstration facility to assess system performance with intentionally damaged fibers. Staff also supported the final sampling of reverse osmosis (RO) concentrate by the Los Angeles County Sanitation Districts (LACSD). Remaining LACSD monitoring will evaluate compliance with regulatory requirements under the proposed ocean discharge of RO concentrate and any other waste or diversion streams from a potential full-scale advanced water treatment facility.

Staff continued to plan for completion of current operations in a tertiary MBR mode, shutdown of the facility for cleaning and maintenance, and upgrades to pumps and piping before transitioning to the secondary MBR operations and testing phase later this year.

WATER SYSTEM OPERATIONS *continued*



Samples of reverse osmosis permeate being collected at the demonstration facility



Staff flushing a new sample tap (left) and completing disinfection and flushing of the membrane bioreactor sampling skid (right) at the demonstration facility

WATER SYSTEM OPERATIONS *continued*



Reverse osmosis permeate piping being modified to improve access to equipment at the demonstration facility

Objective #5 Manage Power Resources and Energy Use in a Sustainable Manner.

Metropolitan's hydroelectric plants generated an average of about 7.4 megawatts, or 5,520 megawatt-hours, and over \$315,980 in revenue, for August 2021. Metropolitan's solar facilities at the Jensen and Skinner plants, and the DVL Visitor Center, total 2.4 megawatts of capacity and generated approximately 430 megawatt-hours in August 2021. The 3.0 MW solar facility at the Weymouth plant also generated energy in August, but reporting is not available at this time because of metering issues.

Objective #6 Protect Source Water Quality.

At Lake Skinner, an area spanning over 500 acres was treated with seven tons of copper sulfate on September 1 to control a bloom of problematic cyanobacteria. The treatment involved application of copper sulfate using a helicopter with a specially built spreader. This operation involves a substantial ground crew wearing personal protective equipment (PPE) to load and reload the hopper as the helicopter hovers overhead. Caution signs were posted at the lake's recreation area on August 28 because cyanotoxins were detected above the State's voluntary guidance threshold for recreational water. The treatment was successful, and the caution signs were removed on September 16.



Staff loading copper sulfate into the hopper/spreader for application at Lake Skinner

WATER SYSTEM OPERATIONS *continued*



Staff loading copper sulfate in the spreader bucket at Lake Skinner



Treating Lake Skinner with copper sulfate to control a problematic cyanobacterial bloom

The California Department of Water Resources (DWR) treated Silverwood Lake with copper sulfate on September 9 to control a cyanobacterial bloom that was producing taste and odor compounds.

On September 23, staff participated in the quarterly stakeholder meeting regarding perchlorate cleanup at the former Tronox site in Henderson, Nevada. Metropolitan and stakeholders provided the Nevada Environmental Response Trust with feedback on the remedial investigation reports for onsite operable units. Staff continues to monitor the overall

WATER SYSTEM OPERATIONS *continued*

development of the long-term remedial plan and distribution of the Trust's funds for site cleanup to ensure continued protection of Colorado River water quality.

GM STRATEGIC PRIORITY #3: Innovation

Objective #1 Develop New Solutions to Enhance Operational and Business Processes

Staff continues to advance efforts to meet the environmental and regulatory challenge to transition Metropolitan to a sustainable zero emission fleet. To review the technology marketplace, staff attended the Advanced Clean Transportation (ACT) Expo, which is North America's largest clean fleet event providing hands-on access to the fuels, technologies, and vehicles driving the future of transportation. Staff was able to "walk the talk" and drive a hydrogen electric hybrid yard truck, an electric powered F-150 Raptor, a battery electric transit Ford cargo van, and a SOLO single-occupant electric vehicle.



Staff viewing electric fleet at the ACT Expo

Objective #2 Support and Engage with Member Agencies on Technical Matters.

In August, the California Department of Water Resources found a few quagga mussels in Castaic Lake. On September 10, staff met with counterparts from the Los Angeles Department of Water and Power to discuss the discovery and potential implications for operations in the West Branch of the State Water Project; there are currently no restrictions on operations. Increased monitoring over the next few months will provide additional information on the true extent of the infestation.

Objective #3 Advance Education and Outreach Initiatives.

Staff organized a 90-minute panel titled "Partnerships for Success with the Regional Recycled Water Program" at the WaterReuse California Annual Conference (September 19-21) and delivered a variety of presentations that discussed the essential role of partnerships in the RRWP through institutional relationships, research and technology advancements, and public and regulatory engagement. Conference attendees were also provided with a virtual tour of the RRWAPC demonstration facility.

WATER SYSTEM OPERATIONS *continued*

Monthly Update as of:

9/30/2021

<u>Reservoir</u>	<u>Current Storage</u>	<u>Percent of Capacity</u>
<i>Colorado River Basin</i>		
Lake Powell	7,270,000	30%
Lake Mead	9,015,000	35%
<i>DWR</i>		
Lake Oroville	788,076	22%
Shasta Lake	1,076,881	24%
San Luis Total	254,620	13%
San Luis CDWR	210,003	20%
Castaic Lake	89,342	28%
Silverwood Lake	67,558	90%
Lake Perris	110,334	84%
<i>MWD</i>		
DVL	620,127	77%
Lake Mathews	130,811	72%
Lake Skinner	37,009	84%



Hoover Dam



Metropolitan’s Mission is to provide its service area with adequate and reliable supplies of high-quality water to meet present and future needs in an environmentally and economically responsible way.

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Other Matters

Continuing Education

On September 30, the Legal Department hosted a webinar training entitled "Appendix A/Financial Disclosure Training." The training was provided by the law firm of Stradling Yocca Carlson & Rauth,

Metropolitan's outside bond disclosure counsel. This training, which was designed for Metropolitan employees who contribute or otherwise participate in the preparation of Metropolitan's Appendix A, was attended by Legal Department staff, several managers, and staff from different departments.

Matters Received by the Legal Department

<u>Category</u>	<u>Received</u>	<u>Description</u>	<u>Documents Requested</u>
Requests Pursuant to the Public Records Act	9	<u>Requestor</u>	
		AFSCME Local 1902	Plant files relating to Lake Skinner operators
		Center for Contract Compliance (3 requests)	Certified payroll records from July 2020 to June 2021 and fringe benefit statement for Summit Landcare for (1) landscape maintenance, tree trimming and herbicide applications for South Orange County Distribution Facilities; (2) landscape maintenance, tree trimming and herbicide applications for North Orange County Distribution Facilities; and (3) Live Oak Reservoir landscape maintenance and tree trimming services
		Environmental Science Associates	Data on water treatment amounts at Weymouth Water Treatment Plant
		Gary G. Kreep, Attorney-at-Law	Records relating to Metropolitan's interests in site located in the Ormond Beach area in the City of Oxnard
		ICF	Contract, proposals and evaluation materials for Regional Recycled Water Program - Environmental Planning Support
		Padre Associates	Records on presence of any water pipelines located near proposed new school site the city of Fontana
		Private Citizen	Geologic report by V. P. Pentegoff dated October 20, 1956 on construction/ installation of MWD's pipeline through Anaheim Hills
Other Matters	1	Wage garnishment	



Bay-Delta and SWP Litigation	
Subject	Status
<p>Consolidated DCP Revenue Bond Validation Action and CEQA Case</p> <p><i>Sierra Club, et al. v. California Department of Water Resources</i> (CEQA, designated as lead case)</p> <p><i>DWR v. All Persons Interested</i> (Validation)</p> <p>Sacramento County Superior Ct. (Judge Earl)</p>	<ul style="list-style-type: none"> • Validation Action <ul style="list-style-type: none"> • Metropolitan, Mojave Water Agency, Coachella Valley Water District, and Santa Clarita Valley Water Agency have filed answers in support • Kern County Water Agency, Tulare Lake Basin Water Storage District, Oak Flat Water District, County of Kings, Kern Member Units & Dudley Ridge Water District, and City of Yuba City filed answers in opposition • North Coast Rivers Alliance et al., Howard Jarvis Taxpayers Association, Sierra Club et al., County of Sacramento & Sacramento County Water Agency, CWIN et al., Clarksburg Fire Protection District, Delta Legacy Communities, Inc, and South Delta Water Agency & Central Delta Water Agency have filed answers in opposition • Case ordered consolidated with the DCP Revenue Bond CEQA Case for pre-trial and trial purposes and assigned to Judge Earl for all purposes • Sierra Club, DWR, North Coast Rivers Alliance and Public Agencies' motions for summary judgment on CEQA affirmative defenses to be heard Dec. 17, 2021 • CEQA Case <ul style="list-style-type: none"> • Sierra Club, Center for Biological Diversity, Planning and Conservation League, Restore the Delta, and Friends of Stone Lakes National Wildlife Refuge filed a standalone CEQA lawsuit challenging DWR's adoption of the bond resolutions • Alleges DWR violated CEQA by adopting bond resolutions before certifying a Final EIR for the Delta Conveyance Project • Cases ordered consolidated for pre-trial and trial purposes • Sierra Club motion for summary judgment on CEQA cause of action hearing on Dec. 17, 2021



<p>SWP-CVP 2019 BiOp Cases</p> <p><i>Pacific Coast Fed'n of Fishermen's Ass'ns, et al. v. Raimondo, et al. (PCFFA)</i></p> <p><i>Calif. Natural Resources Agency, et al. v. Raimondo, et al. (CNRA)</i></p> <p>Federal District Court, Eastern Dist. of California, Fresno Division (Judge Drozd)</p>	<ul style="list-style-type: none"> • SWC intervened in both <i>PCFFA</i> and <i>CNRA</i> cases • Briefing on federal defendants' motion to dismiss CNRA's California ESA claim is complete; no hearing date set and may be decided on the papers • Federal defendants circulated administrative records for each of the BiOps • December 18, 2020 PCFFA and CNRA filed motions to complete the administrative records or to consider extra-record evidence in the alternative • Federal defendants reinitiated consultation on Oct 1, 2021 • <u>Federal defendants and state plaintiffs announced they will file a motion on November 9, 2021 to stay the cases until September 2022 and to adopt an interim operations plan for the coming year</u> • <u>Court ordered federal defendants and state plaintiffs to provide any analysis of the interim operations plan to other parties, including intervenors</u> • <u>Briefing on PCFFA et al.'s motion to complete the administrative records has resumed and will be complete by Nov. 22, 2021</u>
<p>CESA Incidental Take Permit Cases</p> <p>Coordinated Case Name <i>CDWR Water Operations Cases</i>, JCCP 5117 (Coordination Trial Judge Gevercer)</p> <p><i>Metropolitan & Mojave Water Agency v. Calif. Dept. of Fish & Wildlife, et al. (CESA/CEQA/Breach of Contract)</i></p> <p><i>State Water Contractors & Kern County Water Agency v. Calif. Dept. of Fish & Wildlife, et al. (CESA/CEQA)</i></p> <p><i>Tehama-Colusa Canal Auth., et al. v. Calif. Dept. of Water Resources (CEQA)</i></p> <p><i>San Bernardino Valley Municipal Water Dist. v. Calif. Dept. of Water Resources, et al. (CEQA/CESA/ Breach of Contract/Takings)</i></p> <p><i>Sierra Club, et al. v. Calif. Dept. of Water Resources (CEQA/Delta Reform Act/Public Trust)</i></p>	<ul style="list-style-type: none"> • All 8 cases ordered coordinated in Sacramento County Superior Court • Stay on discovery issued until coordination trial judge orders otherwise • All four Fresno cases transferred to Sacramento to be heard with the four other coordinated cases • SWC and Metropolitan have submitted Public Records Act requests seeking administrative record materials and other relevant information • Answers filed in the three cases filed by State Water Contractors, including Metropolitan's • Draft administrative records produced on Sept. 16, 2021 • Certified administrative records due early March 2022



<p><i>North Coast Rivers Alliance, et al. v. Calif. Dept. of Water Resources</i> (CEQA/Delta Reform Act/Public Trust)</p> <p><i>Central Delta Water Agency, et. al. v. Calif. Dept. of Water Resources</i> (CEQA/Delta Reform Act/Public Trust/ Delta Protection Acts/Area of Origin)</p> <p><i>San Francisco Baykeeper, et al. v. Calif. Dept. of Water Resources, et al.</i> (CEQA/CESA)</p>	
<p>CDWR Environmental Impact Cases Sacramento Superior Ct. Case No. JCCP 4942, 3d DCA Case No. C091771 (20 Coordinated Cases)</p> <p>Validation Action <i>DWR v. All Persons Interested</i></p> <p>CEQA 17 cases</p> <p>CESA/Incidental Take Permit 2 cases</p>	<ul style="list-style-type: none"> • Cases dismissed after DWR rescinded project approval, bond resolutions, decertified the EIR, and CDFW rescinded the CESA incidental take permit • January 10, 2020 – Nine motions for attorneys’ fees and costs denied in their entirety • Parties have appealed attorneys’ fees and costs rulings • <u>Appeals fully briefed</u>
<p>COA Addendum/ No-Harm Agreement</p> <p><i>North Coast Rivers Alliance v. DWR</i> Sacramento County Superior Ct. (Judge Gevercer)</p>	<ul style="list-style-type: none"> • Plaintiffs allege violations of CEQA, Delta Reform Act & public trust doctrine • USBR Statement of Non-Waiver of Sovereign Immunity filed September 2019 • Westlands Water District and North Delta Water Agency granted leave to intervene • Metropolitan & SWC monitoring • Deadline to prepare administrative record extended to Nov. 16, 2021
<p>Delta Plan Amendments and Program EIR 4 Consolidated Cases Sacramento County Superior Ct. (Judge Gevercer)</p> <p><i>North Coast Rivers Alliance, et al. v. Delta Stewardship Council</i> (lead case)</p> <p><i>Central Delta Water Agency, et al. v. Delta Stewardship Council</i></p> <p><i>Friends of the River, et al. v. Delta Stewardship Council</i></p> <p><i>California Water Impact Network, et al. v. Delta Stewardship Council</i></p>	<ul style="list-style-type: none"> • Cases challenge, among other things, the Delta Plan Updates recommending dual conveyance as the best means to update the SWP Delta conveyance infrastructure to further the coequal goals • Allegations relating to “Delta pool” water rights theory and public trust doctrine raise concerns for SWP and CVP water supplies • Cases consolidated for pre-trial and trial under <i>North Coast Rivers Alliance v. Delta Stewardship Council</i> • SWC granted leave to intervene • Metropolitan supports SWC



<p>Delta Stewardship Council Cases 3 Remaining Cases (CEQA claims challenging original 2013 Delta Plan EIR) (Judge Chang)</p> <p><i>North Coast Rivers Alliance, et al. v. Delta Stewardship Council</i></p> <p><i>Central Delta Water Agency, et al. v. Delta Stewardship Council</i></p> <p><i>California Water Impact Network, et al. v. Delta Stewardship Council</i></p>	<ul style="list-style-type: none"> 2013 and 2018 cases to be heard separately due to peremptory challenge SWC and several individual members, including Metropolitan, SLDMWA and Westlands have dismissed their remaining 2013 CEQA claims but remain intervenor-defendants in the three remaining <i>Delta Stewardship Council Cases</i> <p>2013 Cases</p> <ul style="list-style-type: none"> Hearing on merits of CEQA claims in the three remaining 2013 cases re-set for Nov. 5, 2021 <p>2018 Cases</p> <ul style="list-style-type: none"> July 15, 2021 - Opening Briefs Oct. 13, 2021 - Opposition Briefs Nov. 22, 2021 - Reply Briefs Dec. 10, 2021 - Case Management Conference to set hearing on the merits
<p>SWP Contract Extension Validation Action Sacramento County Superior Ct. (Judge Culhane)</p> <p><i>DWR v. All Persons Interested in the Matter, etc.</i></p>	<ul style="list-style-type: none"> DWR seeks a judgment that the Contract Extension amendments to the State Water Contracts are lawful Metropolitan and 7 other SWCs filed answers in support of validity to become parties Four answers filed in opposition denying validity on multiple grounds raised in affirmative defenses Case deemed related to the two CEQA cases below and assigned to Judge Culhane DWR certified the administrative record for the validation action on May 3, 2021 Parties stipulated to a revised briefing schedule in all three related cases (validation and CEQA): Opening Briefs Sept. 17, 2021 Opposition Briefs Nov. 15, 2021 Reply Briefs Dec. 17, 2021 Jan. 5, 2022 Hearing on the merits with CEQA cases, below
<p>SWP Contract Extension CEQA Cases Sacramento County Superior Ct. (Judge Culhane)</p> <p><i>North Coast Rivers Alliance, et al. v. DWR</i></p> <p><i>Planning & Conservation League, et al. v. DWR</i></p>	<ul style="list-style-type: none"> Petitions for writ of mandate alleging CEQA and Delta Reform Act violations filed on January 8 & 10, 2019 Deemed related to DWR's Contract Extension Validation Action and assigned to Judge Culhane Administrative Record completed



	<ul style="list-style-type: none"> • DWR filed its answers on September 28, 2020 • Metropolitan, Kern County Water Agency and Coachella Valley Water District have intervened and filed answers in the two CEQA cases • Briefing and hearing on the merits same as for the SWP Contract Extension Validation Action, above
Delta Conveyance Project Soil Exploration Case <i>Central Delta Water Agency, et al. v. DWR</i> Sacramento County Superior Ct. (Judge Chang)	<ul style="list-style-type: none"> • Filed August 10, 2020 • Plaintiffs Central Delta Water Agency, South Delta Water Agency and Local Agencies of the North Delta • One cause of action alleging that DWR's adoption of an Initial Study/Mitigated Negative Declaration (IS/MND) for soil explorations needed for the Delta Conveyance Project violates CEQA • March 24, 2021 Second Amended Petition filed to add allegation that DWR's addendum re changes in locations and depths of certain borings violates CEQA • Deadline to prepare the administrative record extended to Nov. 8, 2021
Water Management Tools Contract Amendment <i>California Water Impact Network et al. v. DWR</i> Sacramento County Superior Ct. (Judge Earl) <i>North Coast Rivers Alliance, et al. v. DWR</i> Sacramento County Super. Ct. (Judge Earl)	<ul style="list-style-type: none"> • Filed September 28, 2020 • CWIN and Aqualliance allege one cause of action for violation of CEQA • NCRA et al. allege four causes of action for violations of CEQA, the Delta Reform Act, Public Trust Doctrine and seeking declaratory relief • Deadline to prepare the administrative record extended to Sept. 27, 2021 in <i>CWIN v. DWR</i> case and <u>Nov. 30</u>, 2021 in <i>NCRA v. DWR</i> case • <i>CWIN</i> case reassigned to Judge Earl so both cases will be heard together • Trial set for Jan. 14, 2022



San Diego County Water Authority v. Metropolitan, et al.		
Cases	Date	Status
2010, 2012	Aug. 13-14, 2020	Final judgment and writ issued. Transmitted to the Board on August 17.
	Aug. 28, Sept. 1	SDCWA and Metropolitan filed memoranda of costs.
	Sept. 11	Metropolitan filed notice of appeal of judgment and writ.
	Sept. 14, 16	Metropolitan filed motion to strike SDCWA's costs memorandum, and SDCWA filed motion to strike or tax Metropolitan's costs memorandum.
	Jan. 13, 2021	Court issued order finding SDCWA is the prevailing party on the Exchange Agreement, entitled to attorneys' fees and costs under the contract.
	Feb. 4	Metropolitan filed opening appellate brief regarding final judgment and writ.
	Feb. 10	Court issued order awarding SDCWA statutory costs, granting SDCWA's and denying Metropolitan's related motions.
	Feb. 16	Per SDCWA's request, Metropolitan paid contract damages in 2010-2012 cases judgment and interest. Metropolitan made same payment in Feb. 2019, which SDCWA rejected.
	Feb. 25	Metropolitan filed notice of appeal of Jan. 13 (prevailing party on Exchange Agreement) and Feb. 10 (statutory costs) orders.
	Aug. 5	Metropolitan filed opening appellate brief regarding prevailing party on the Exchange Agreement and statutory costs.
	Sept. 21	Court of Appeal issued opinion on Metropolitan's appeal regarding final judgment and writ, holding: (1) the court's 2017 decision invalidating allocation of Water Stewardship Rate costs to transportation in the Exchange Agreement price and wheeling rate applied not only to 2011-2014, but also 2015 forward; (2) no relief is required to cure the judgment's omission of the court's 2017 decision that allocation of State Water Project costs to transportation is lawful; and (3) the writ is proper and applies to 2015 forward.
	<u>Sept. 21</u>	<u>SDCWA filed responding appellate brief regarding prevailing party on the Exchange Agreement and statutory costs.</u>
2014, 2016	Aug. 28, 2020	SDCWA served first amended (2014) and second amended (2016) petitions/complaints.



Cases	Date	Status
	Sept. 28	Metropolitan filed demurrers and motions to strike portions of the amended petitions/complaints.
	Sept. 28-29	Member agencies City of Torrance, Eastern Municipal Water District, Foothill Municipal Water District, Las Virgenes Municipal Water District, Three Valleys Municipal Water District, Municipal Water District of Orange County, West Basin Municipal Water District, and Western Municipal Water District filed joinders to the demurrers and motions to strike.
	Feb. 16, 2021	Court issued order denying Metropolitan's demurrers and motions to strike, allowing SDCWA to retain contested allegations in amended petitions/complaints.
	March 22	Metropolitan filed answers to the amended petitions/complaints and cross-complaints against SDCWA for declaratory relief and reformation, in the 2014, 2016 cases.
	March 22-23	Member agencies City of Torrance, Eastern Municipal Water District, Foothill Municipal Water District, Las Virgenes Municipal Water District, Three Valleys Municipal Water District, Municipal Water District of Orange County, West Basin Municipal Water District, and Western Municipal Water District filed answers to the amended petitions/complaints in the 2014, 2016 cases.
	April 23	SDCWA filed answers to Metropolitan's cross-complaints.
	Sept. 30	Based on the Court of Appeal's Sept. 21 opinion (described above), and the Board's Sept. 28 authorization, Metropolitan paid \$35,871,153.70 to SDCWA for 2015-2017 Water Stewardship Rate charges under the Exchange Agreement and statutory interest.
2017	July 23, 2020	Dismissal without prejudice entered.
2018	July 28	Parties filed a stipulation and application to designate the case complex and related to the 2010-2017 cases, and to assign the case to Judge Massullo's court.
	Nov. 13	Court ordered case complex and assigned to Judge Massullo's court.
	April 21	SDCWA filed second amended petition/complaint.
	May 25	Metropolitan filed motion to strike portions of the second amended petition/complaint.



Cases	Date	Status
2018 (cont.)	May 25-26	Member agencies City of Torrance, Eastern Municipal Water District, Foothill Municipal Water District, Las Virgenes Municipal Water District, Three Valleys Municipal Water District, Municipal Water District of Orange County, West Basin Municipal Water District, and Western Municipal Water District filed joinders to the motion to strike.
	July 19	Court issued order denying Metropolitan's motion to strike portions of the second amended petition/complaint.
	July 29	Metropolitan filed answer to the second amended petition/complaint and cross-complaint against SDCWA for declaratory relief and reformation.
	July 29	Member agencies City of Torrance, Eastern Municipal Water District, Foothill Municipal Water District, Las Virgenes Municipal Water District, Three Valleys Municipal Water District, Municipal Water District of Orange County, West Basin Municipal Water District, and Western Municipal Water District filed answers to the second amended petition/complaint.
	Aug. 31	SDCWA filed answer to Metropolitan's cross-complaint.
2014, 2016, 2018	June 11	Metropolitan lodged administrative records.
	June 11, 21	Deposition of non-party witness.
	Aug. 25	Hearing on Metropolitan's motion for further protective order regarding deposition of non-party witness.
	Aug. 25	Court issued order consolidating the 2014, 2016, and 2018 cases for all purposes, including trial.
	Aug. 30	Court issued order granting Metropolitan's motion for a further protective order regarding deposition of non-party witness.
	Aug. 31	SDCWA filed consolidated answer to Metropolitan's cross-complaints in the 2014, 2016, and 2018 cases.
	<u>Oct. 27</u>	<u>Parties submitted to the court a joint stipulation and proposed order staying discovery through Dec. 8 and resetting pre-trial deadlines.</u>
	Jan. 12, 2022	Next Case Management Conference. (Sept. 17 Conference postponed.)
All Cases	April 15, 2021	Case Management Conference on 2010-2018 cases. Court set trial in 2014, 2016, and 2018 cases on May 16-27, 2022.



Cases	Date	Status
	April 27	SDCWA served notice of deposition of non-party witness.
	May 13-14	Metropolitan filed motions to quash and for protective order regarding deposition of non-party witness.
	June 4	Ruling on motions to quash and for protective order.



Outside Counsel Agreements				
Firm Name	Matter Name	Agreement No.	Effective Date	Contract Maximum
Andrade Gonzalez LLP	MWD v. DWR, CDFW and CDNR Incidental Take Permit (ITP) CESA/CEQA/Contract Litigation	185894	07/20	\$250,000
Aleshire & Wynder	Oil, Mineral and Gas Leasing	174613	08/18	\$50,000
Atkinson Andelson Loya Ruud & Romo	Employee Relations	59302	04/04	\$1,214,517
	MWD v. Collins	185892	06/20	\$60,000
	<u>Delta Conveyance Project Bond Validation-CEQA Litigation</u>	<u>185899</u>	<u>09/21</u>	<u>\$100,000</u>
	MWD Drone and Airspace Issues	193452	08/20	\$50,000
	Equal Employee Opportunity Commission Charge	200462	03/21	\$20,000
	Public Employment Relations Board Charge No. LA-CE-1441-M	200467	03/21	\$30,000
	Representation re the Shaw Law Group's Investigations	200485	05/20/21	\$50,000
	DFEH Charge (DFEH Number 202102-12621316)	201882	07/01/21	\$25,000
	AFSCME Local 1902 in Grievance No. 1906G020 (CSU Meal Period)	201883	07/12/21	\$30,000
	AFSCME Local 1902 v. MWD, PERB Case No. LA-CE-1438-M	201889	09/15/21	\$20,000
Best, Best & Krieger	Navajo Nation v. U.S. Department of the Interior, et al.	54332	05/03	\$185,000
	Iron Mountain SMARA (Surface Mining and Reclamation Act)	158043	07/17	\$250,000
	Bay-Delta Conservation Plan/Delta Conveyance Project (with SWCs)	170697	08/17	\$500,000
	Environmental Compliance Issues	185888	05/20	\$50,000



Firm Name	Matter Name	Agreement No.	Effective Date	Contract Maximum
Blooston, Mordkofsky, Dickens, Duffy & Prendergast, LLP	FCC and Communications Matters	110227	11/10	\$100,000
Buchalter, a Professional Corp.	Union Pacific Industry Track Agreement	193464	12/07/20	\$50,000
Burke, Williams & Sorensen, LLP	Real Property - General	180192	01/19	\$100,000
	Labor and Employment Matters	180207	04/19	\$50,000
	General Real Estate Matters	180209	08/19	\$100,000
Law Office of Alexis S.M. Chiu*	Bond Counsel	174595	07/18	N/A
	Bond Counsel	200468	07/21	N/A
Cislo & Thomas LLP	Intellectual Property	170703	08/17	\$75,000
Curls Bartling P.C.*	Bond Counsel	174596	07/18	N/A
	Bond Counsel	200470	07/21	N/A
Duane Morris LLP	SWRCB Curtailment Process	138005	09/14	\$615,422
Duncan, Weinberg, Genzer & Pembroke PC	Power Issues	6255	09/95	\$3,175,000
Ellison, Schneider, Harris & Donlan	Colorado River Issues	69374	09/05	\$175,000
	Issues re SWRCB	84457	06/07	\$200,000
Haden Law Office	Real Property Matters re Agricultural Land	180194	01/19	\$50,000
Hanson Bridgett LLP	SDCWA v. MWD	124103	03/12	\$1,100,000
	Finance Advice	158024	12/16	\$100,000
	Deferred Compensation/HR	170706	10/17	\$ 400,000
	Food and Water Watch v. MWD	174612	09/18	\$200,000
	Tax Issues	180200	04/19	\$50,000



Firm Name	Matter Name	Agreement No.	Effective Date	Contract Maximum
<u>Hausman & Sosa, LLP</u>	<u>MOU Hearing Officer Appeal.</u>	<u>201892</u>	<u>09/21</u>	<u>\$25,000</u>
Hawkins Delafield & Wood LLP*	Bond Counsel	193469	07/21	N/A
Horvitz & Levy	SDCWA v. MWD	124100	02/12	\$900,000
	General Appellate Advice	146616	12/15	\$100,000
	Food and Water Watch v. MWD Appeal	185862	09/19	\$60,000
Hunt Ortmann Palffy Nieves Darling & Mah, Inc.	Construction Contracts/COVID-19 Emergency	185883	03/20	\$40,000
Internet Law Center	HR Matter	174603	05/18	\$60,000
	Cybersecurity and Privacy Advice and Representation	200478	04/13/21	\$100,000
	Systems Integrated, LLC v. MWD	201875	05/17/21	\$40,000
Amira Jackmon, Attorney at Law*	Bond Counsel	200464	07/21	N/A
Jackson Lewis P.C.	Employment: Department of Labor Office of Contract Compliance (OFCCP)	137992	02/14	\$45,000
Jones Hall, A Professional Law Corporation*	Bond Counsel	200465	07/21	N/A
Kegel, Tobin & Truce	Workers' Compensation	180206	06/19	\$100,000
Lesnick Prince & Pappas LLP	Topock/PG&E's Bankruptcy	185859	10/19	\$30,000
Liebert Cassidy Whitmore	Labor and Employment	158032	02/17	\$201,444
	EEO Investigations	180193	01/19	\$100,000
	FLSA Audit	180199	02/19	\$50,000
LiMandri & Jonna LLP	Bacon Island Subrogation	200457	03/21	\$50,000



Firm Name	Matter Name	Agreement No.	Effective Date	Contract Maximum
Manatt, Phelps & Phillips	In Re Tronox Incorporated	103827	08/09	\$540,000
	SDCWA v. MWD rate litigation	146627	06/16	\$2,900,000
Meyers Nave Riback Silver & Wilson	OCWD v. Northrop Corporation	118445	07/11	\$2,300,000
	IID v. MWD	185900	08/20	\$ 410,000
	IID v. MWD (Contract Litigation)	193472	02/21	\$100,000
Miller Barondess, LLP	SDCWA v. MWD	138006	12/14	\$600,000
Morgan, Lewis & Bockius	SDCWA v. MWD	110226	07/10	\$8,750,000
	Project Labor Agreements	200476	04/21	\$100,000
Musick, Peeler & Garrett LLP	Colorado River Aqueduct Electric Cables Repair/Contractor Claims	193461	11/20	\$300,000
Norton Rose Fulbright US LLP*	Bond Counsel	200466	07/21	N/A
Olson Remcho LLP	Government Law	131968	07/14	\$200,000
	Ethics Office	170714	01/18	\$350,000
Quinn Emanuel Urquhart & Sullivan	Appellate	174598	04/18	\$100,000
Ryan & Associates	Leasing Issues	43714	06/01	\$200,000
Seyfarth Shaw LLP	HR Litigation	185863	12/19	\$250,000
Stradling Yocca Carlson & Rauth*	Bond Counsel	174599	07/18	N/A
	Bond Counsel	200471	07/21	N/A
Theodora Oringer PC	OHL USA, Inc. v. MWD	185854	09/19	\$1,100,000
	Construction Contracts - General Conditions Update	185896	07/20	\$50,000
Thomas Law Group	MWD v. DWR, CDFW, CDNR – Incidental Take Permit (ITP) CESA/CEQA/Contract Litigation	185891	05/20	\$250,000



Firm Name	Matter Name	Agreement No.	Effective Date	Contract Maximum
Thompson Coburn LLP	FERC Representation re Colorado River Aqueduct Electrical Transmission System	122465	12/11	\$100,000
	NERC Energy Reliability Standards	193451	08/20	\$25,000
Van Ness Feldman, LLP	General Litigation	170704	07/18	\$50,000
	Colorado River MSHCP	180191	01/19	\$50,000
	Bay-Delta and State Water Project Environmental Compliance	193457	10/15/20	\$50,000
Western Water and Energy	California Independent System Operator Related Matters	193463	11/20/20	\$100,000

*Expenditures paid by Bond Proceeds/Finance



Internal Audit Report for September 2021

Summary

One report was issued during the month:

Quarterly Consulting and Services Contracts Review Report for Period Ending June 30, 2021

Discussion Section

This report highlights the significant activities of the Internal Audit Department during September 2021. In addition to presenting background information and the opinion expressed in the audit report, a discussion of findings noted during the examination is also provided.

Quarterly Consulting and Services Contracts Review Report for Period Ending June 30, 2021

We reviewed the reports for consulting and routine services contracts for the period ending June 30, 2021, issued by the Chief Administrative Officer. This review included the Annual Report of Professional Services Agreements (Professional Services Report) for the Fiscal Year 2020/21 and the Report of Contracts for Equipment, Materials, Supplies, and Routine Services of \$250,000 or Above (Contracts Report) for the Fourth Quarter of Fiscal Year 2020/21. The purpose of this review is to gain reasonable assurance that the information included in these reports is accurate, complete, timely, and in compliance with the Metropolitan Water District Administrative Code.

PROFESSIONAL SERVICES AGREEMENTS REPORT

Background

Administrative Code Section 2720(e)(2) requires that the General Manager report to the Organization, Personnel and Technology Committee on the employment of any professional and technical consultant, the extension of any professional and technical consulting agreement, and on the Exercise of Authority under Sections 8121(c) and 8122(h) during the preceding calendar quarter. The Administrative Code also requires the Professional Services Report to indicate a former Metropolitan employee when a consultant. Administrative Code Sections 2721-2723 require the General Counsel, General Auditor, and Ethics Officer to report quarterly to their respective committee concerning any expert or professional service agreements executed pursuant to their authority under the Administrative Code.

The Professional Services Report is prepared quarterly and annually to comply with these Administrative Code requirements and identify those contracts administered by the General Manager, General Counsel, General Auditor, and Ethics Officer.

During the fiscal year ending June 2021, the Professional Services Report disclosed that Metropolitan paid \$56.53 million for consulting and professional services. We compared the amounts expended on professional services during this fiscal year against the prior fiscal year and noted a decrease of \$23.88 million.

It should be noted that totals reported under the General Counsel's authority exclude payments related to the San Diego County Water Authority litigation, which is accounted for under the Self-Insurance Retention Fund.

For fiscal year 2020/21, 56 of 473 agreements were sole-source agreements totaling \$4,467,038. This represents 8% of total fiscal year-to-date expenditures for the fiscal year 2020/21. In fiscal year 2019/20, 62 of 475 agreements were sole-source agreements totaling \$4,301,516.

We also noted that 141 of 473 agreements, totaling \$1,589,807, were small purchases of less than \$74,999. In fiscal year 2019/20 such purchases represented 134 of 475 agreements and totaled \$2,149,575.

See tables below for details:

Fiscal Year 2020/21

Fiscal Year-to-Date	General Manager	General Counsel	General Auditor	Ethics Officer
Contract Expenditures	\$ 55,766,648	\$1,719,105	\$ 449,100	\$ 317,719
Active Agreements	353	*155	1	1
Terminated Agreements	117	21	-	1

* Agreements with transactions during the current fiscal year.

Govt. Agencies	RFP	RFQ	Small Purchases	Sole Source
\$ 1,049,766	\$ 28,701,537	\$ 20,725,320	\$ 1,589,807	\$ 4,467,038
15	52	209	141	56
2%	50%	37%	3%	8%

Note: The categories do not include General Counsel Expenditures

Fiscal Year 2019/20

Fiscal Year-to-Date	General Manager	General Counsel	General Auditor	Ethics Officer
Contract Expenditures	\$79,937,162	\$1,394,751	\$456,685	\$23,988
Active Agreements	369	141*	1	1
Terminated Agreements	103	39	-	1

* Agreements with transactions during the current fiscal year.

Govt. Agencies	RFP	RFQ	Small Purchases	Sole Source
\$744,732	\$44,058,913	\$29,163,099	\$2,149,575	\$4,301,516
15	46	218	134	62
1%	55%	36%	3%	5%

Note: The categories do not include General Counsel Expenditures

Testing Procedures Performed

Our procedures included a cursory review of the reasonableness of the professional service expenditures and analysis of consultants with multiple active agreements, to determine whether an agreement was split into smaller contract amounts to circumvent established approval limits. We also evaluated whether statistics in the Professional Services Report were adequately supported and assessed the timeliness of board reporting.

Testing results

Our review did not reveal any agreements that appeared to be unreasonable or split to override established approval limits. In addition, our review did not reveal any material differences between the reported amounts and supporting documentation. Finally, we noted that the Professional Services Report was issued on September 14, 2021.

CONTRACTS FOR EQUIPMENT, MATERIALS, SUPPLIES, AND ROUTINE SERVICES OF \$250,000 OR ABOVE REPORT

Background

Administrative Code Section 2720(e)(2) requires that the General Manager report quarterly to the Organization, Personnel and Technology Committee on the execution of any contract authorized under Section 8122(g) – Contracts for Equipment, Materials, Supplies and Routine Services. Section 8122(g) states: “the General Manager may execute contracts for the purchase of materials, supplies, and other consumable items such as fuels, water treatment chemicals, materials for construction projects and other bulk items, and for routine services such as waste disposal and maintenance services, which are generally identified in the budget, regardless of dollar value, provided that sufficient funds are available within the adopted budget for such materials, supplies, and routine services.”

During the quarter ending June 30, 2021, the Contracts Report disclosed twenty-five contracts that fit these criteria. We noted the total maximum amount payable for these contracts was \$30 million. Fifteen of these contracts were awarded as a result of competitive bidding under Administrative Code Section 8140 – Competitive Procurement; two were cooperative agreements, whereas eight were sole-sourced.

Testing Procedures Performed

Our procedures included a cursory review of the reasonableness of expenditures. We also verified that all contracts of \$250,000 or more for specified items were included in the Contracts

Report and adequately supported. Further, we reviewed sole-source agreements for justification and approval. Finally, we assessed the timeliness of board reporting.

Testing results

Our review did not reveal any discrepancies between the contracts and amounts shown in the Contracts Report and supporting documentation. We also noted that the policies and procedures for competitive bidding, cooperative agreements, sole source agreements are in place. Finally, we noted for the quarter ending June 30, 2021 Contracts Report was issued to the board on September 14, 2021.



Ethics Office Monthly Report

September 2021

INDEPENDENT REVIEW OF EEO RELATED CONCERNS

Continued addressing contract administration duties and follow-up questions from directors and staff regarding the independent review. Coordinated final resolution process for four EEO investigations completed by Shaw Law Group.

COMPLIANCE

Conflict of Interest Code Amendment – Completed the state-mandated comprehensive review of Metropolitan's Conflict of Interest Code (COI Code), which identifies which Metropolitan employees must submit Form 700s and what financial interests they must disclose. The review entailed evaluating all existing job descriptions at the district and determining 1) whether any job titles need to be added to the COI Code and 2) the appropriate level of financial disclosure for each job title.

In consultation with the Fair Political Practices Commission, staff proposed adding new job titles to the COI Code and tailoring disclosure requirements consistent with state regulations. On September 20, 2021, a notice and comment period began for employees to comment on the proposed amendments. Staff will evaluate comments and make additional amendments if necessary. The revised COI Code is expected to take effect by the end of 2021.

Form 700 – Assisted Board members and employees with Assuming Office and Leaving Office Form 700 filings. Assistance

included notifications of deadlines and troubleshooting the electronic filing system. Monitored the status of past due Assuming Office and Leaving Office Form 700 filings; obtained compliance from three former employees and issued past-due notices to three other former employees.

ADVICE/EDUCATION

Addressed nine new advice matters involving: conflicts of interest, gifts, financial disclosure, political activities, gifts, and other ethics-related topics.

Provided a live new filer training session for an employee promoted into a position requiring Form 700 filings.

INVESTIGATIONS

Allegations that a supervisor retaliated against an employee for reporting potential workplace safety violations and other misconduct were not substantiated. The investigation was conducted by an external firm and coordinated with the General Counsel's Office because the allegations also involved non-ethics concerns.

ADVICE AND INVESTIGATIVE DATA

Advice Matters	9
Compliance Assistance	26
Complaints Received	0
Investigations Opened	0
Pending Investigations	2

MINUTES
REGULAR MEETING OF THE
BOARD OF DIRECTORS
THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA
September 14, 2021

52490 The Board of Directors of The Metropolitan Water District of Southern California met in Regular Meeting on Tuesday, September 14, 2021.

Chairwoman Gray called the Teleconference Meeting to order at 12:16 p.m.

52491 The Meeting was opened with an invocation by Carmen Bermudez-Bracy, Principal Administrative Analyst, Business Outreach, External Affairs Group.

52492 The Pledge of Allegiance to the Flag was given by Director Smith, San Diego County Water Authority

Chairwoman addressed the Board providing brief remarks acknowledging Hispanic Heritage Month.

52493 Board Secretary Abdo administered the roll call. Those responding present were: Directors Abdo, Ackerman, Apodaca, Atwater, Blois, Butkiewicz, Camacho, Cordero, De Jesus, Dennstedt, Dick, Erdman, Faessel, Fellow, Goldberg, Gray, Hawkins, Hogan, Jung, Kurtz, Lefevre, McCoy, Morris, Murray, Ortega, Petersen, Peterson, Phan, Pressman, Ramos, Record, Repenning, Smith, Tamaribuchi, and Williams.

Those not responding were: Directors Kassakhian, Luna, and Quinn.

Board Secretary Abdo declared a quorum present.

52494 Chairwoman Gray invited members of the public to address the Board on matters within the Board's jurisdiction.

Name	Affiliation	Item
1. Sidney		Delta tunnel
2. John Mendoza		Various matters

Chairwoman Gray addressed the following: Other Matters and Reports.

52495 Chairwoman Gray asked if there were any changes to the report of events attended by Directors at Metropolitan's expense during the month of August as previously posted and distributed to the Board.

No amendments were made.

52496 Chairwoman Gray referred to her monthly report, which was previously posted and distributed to the Board.

Chairwoman Gray announced that the Palo Verde Irrigation District (PVID) is holding an election for two of its seven members of its Board of Trustees on September 23, 2021. Metropolitan is authorized to count votes based on its ownership of land and PVID. Metropolitan Resolution 9196 authorizes the Chair to cast Metropolitan votes directly or by granting a proxy to a Metropolitan employee or agent. Chairwoman Gray granted a proxy to Director Randy Record to cast Metropolitan's vote. The incumbents seeking reelection on PVID's Board of Trustees, are Gary Bryce and Brad Robinson. Debra Keenan and Michael Mullion have also filed to run as candidates for the Board of Trustees. Chairwoman Gray invited any directors to provide input to her regarding the election after the Board meeting.

52497 Regarding matters relating to Metropolitan's operations and activities, General Manager Hagekhalil announced the following:

1. Reorganization of the General Manager's Executive Team.
2. Continuing our efforts traveling to all Metropolitan facilities to visit with staff.

Additional information on the General Manager's activities may be found in his written monthly report.

52498 General Counsel Scully stated she had nothing to add to her report.

Director Smith asked a question to General Counsel Scully.

52499 General Auditor Riss stated that his work with KPMG continues on the annual financial audit; the department is on target to have the audit complete and will provide a presentation to the committee on October 26.

52500 Ethics Officer Salinas stated he had nothing to add to his report.

52501 Chairwoman Gray acknowledged Director Gloria Cordero, representing the city of Long Beach, for her five years of service as a Metropolitan Board member.

Director Cordero expressed her appreciation.

Chairwoman Gray addressed the Consent Calendar Other Items for September 2021.

52502 Approval of the Minutes of the meeting for August 17, 2021. Chairwoman Gray asked Directors if there were any comments or discussion on the approval of the Minutes of the Meeting for August 17, 2021 (Agenda Item 6A). No comments or requests were made.

52503 Approval of Committee Assignments (Agenda Item 6B).

Chairwoman Gray appointed Director Dennstedt as a member to the following committees:

- Finance and Insurance Committee
- Audit and Ethics Committee
- Facilities Naming Ad Hoc Committee.

Chairwoman Gray called on the Committee Chairs to give a report of the Consent Calendar Action Items as discussed at their Committees.

52504 Authorize an increase of \$185,000 to an agreement with Rincon Consultants, Inc. for a new not-to-exceed amount of \$1 million for services related to the preparation of a Climate Action Plan and CEQA documentation, as set forth in Agenda Item 7-1 board letter.

52505 Award an \$11,604,521 contract to Ameresco, Inc. to construct Battery Energy Storage System Facilities at the Jensen and Skinner plants; and authorize increase of \$550,000 to agreement with Stantec, Inc. for a new not-to-exceed total of \$1,450,000, to provide technical support, as set forth in Agenda Item 7-2 board letter.

52506 Authorize an agreement with HDR Engineering, Inc. in an amount not to exceed \$635,000 for engineering services to replace the 2.4 kV power line to Black Metal Mountain communications site, as set forth in Agenda Item 7-3 board letter.

52507 Authorize the General Manager to sponsor the California Resiliency Challenge with a \$200,000 contribution and renew Metropolitan's seat on the Steering Committee, as set forth in Agenda Item 7-4 board letter.

52508 Declare that the two subject parcels are surplus land and not necessary for Metropolitan's use based on the written grounds set forth in the staff board letter and authorize their disposal at fair market value under Metropolitan's surplus land disposal policies and procedures, as set forth in Agenda Item 7-5 board letter.

52509 Provided price and terms direction on a possible real property purchase. (Agenda Item 7-6).

52510 Authorize an increase in the maximum amount payable under contract with Ryan & Associates, Attorneys at Law, for advisory legal services related to real estate and commercial leasing law by \$100,000 to a maximum amount payable of \$200,000, as set forth in Agenda Item 7-7 board letter.

52511 Authorize the General Counsel to increase the amount payable by amendment of the contract with Theodora Oringher PC for legal services by \$200,000 for an amount not to exceed \$1,100,000, as set forth in Agenda Item 7-8 board letter.

52512 Authorize the General Counsel to settle matters consistent with Board Letter 7-9, as set forth in Agenda Item 7-9 board letter.

52513 Chairwoman Gray called for a vote to approve the Consent Calendar Items 6A, 6B, and 7-1, 7-2, 7-3, 7-4, 7-5, 7-6, 7-7, 7-8, and 7-9 (**M.I.52502 through M.I. 52512**).

The following Directors asked questions or made comments:

	Directors	Comments/Questions
1.	Morris	Moved Consent Calendar
2.	Dick	Seconded Consent Calendar

Director Morris moved, seconded by Director Dick that the Board approve the Consent Calendar Other Items for Action 6A, 6B and 7-1 through 7-9 as follows:

The following is a record of the vote:

Record of Vote on Consent Item(s): 6A, 6B, 7-1 through 7-5*, 7-6, 7-7, 7-8, and 7-9									
Member Agency	Total Votes	Director	Present	Yes	Yes Vote	No	No Vote	Abstain	Abstain Vote
Anaheim	5277	Faessel	x	x	5277				
Beverly Hills	4056	Pressman	x	x	4056				
Burbank	2666	Ramos	x	x	2666				
Calleguas Municipal Water District	11552	Blois	x	x	11552				
Central Basin Municipal Water District	17051	Apodaca	x	x	8526				
		Hawkins	x	x	8526				
			Subtotal:		17051				
Compton	553	McCoy	x	x	553				
Eastern Municipal Water District	9492	Record	x	x	9492				
Foothill Municipal Water District	2131	Atwater	x	x	2131				
Fullerton	2255	Jung	x	x	2255				
Glendale	3622	Kassakhian							
Inland Empire Utilities Agency	13433	Camacho	x	x	13433				
Las Virgenes	2741	Peterson	x	x	2741				
Long Beach	5772	Cordero	x	x	5772				
Los Angeles	70689	Murray	x	x	23563				
		Petersen	x	x	23563				
		Quinn							
		Luna							
		Repenning	x	x	23563				
			Subtotal:		70689				
Municipal Water Dist. of Orange Coun	57264	Ackerman	x	x	14316				
		Tamaribuchi	x	x	14316				
		Dick	x	x	14316				
		Erdman	x	x	14316				
			Subtotal:		57264				
Pasadena	3522	Kurtz	x	x	3522				
San Diego County Water Authority	58302	Butkiewicz	x	x	14576				
		Goldberg	x	x	14576				
		Hogan	x	x	14576				
		Smith	x	x	14576				
			Subtotal:		58302				
San Fernando	224	Ortega	x	x	224				
San Marino	730	Morris	x	x	730				
Santa Ana	3035	Phan	x	x	3035				
Santa Monica	4352	Abdo	x	x	4352				
Three Valleys Municipal Water District	7753	De Jesus	x	x	7753				
Torrance	3237	Lefevre	x	x	3237				
Upper San Gabriel Valley Mun. Wat. D	11942	Fellow	x	x	11942				
West Basin Municipal Water District	23608	Williams	x	x	11804				
		Gray	x	x	11804				
			Subtotal:		23608				
Western Municipal Water District	12466	Dennstedt	x	x	12466				
Total	337725				334103				
Present and not voting									
Absent	3622								

The motion to approve the Consent Calendar Items 6A, 6B and 7-1, 7-2, 7-3, 7-4, 7-5*, through 7-9 (**M.I.52502 through M.I. 52512**), passed by a vote of 334,103 ayes; 0 noes; 0 abstain; 0 not voting; and 3,622 absent.

***Note: Individual vote tally for Item 7-5**

Director Dennstedt abstained from 7-5. The motion to approve the Consent Calendar Item 7-5 passed by a vote of 321,637 ayes; 0 noes; 12,466 abstain; 0 not voting; and 3,622 absent.

52514 Board Chairwoman Gray asked if there were questions or need for discussion for Board Information Item 9-1 through 9-6. No requests were made.

52515 Chairwoman Gray asked if there were any future agenda items.

Director Ortega asked a question.

52516 There being no objection, at 12:55 p.m., Chairwoman Gray adjourned the Meeting.



GLORIA D. GRAY
CHAIRWOMAN



JUDY ABDO
SECRETARY

MINUTES
SPECIAL MEETING OF THE
BOARD OF DIRECTORS
THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA
September 28, 2021

52517 The Board of Directors of The Metropolitan Water District of Southern California met in Special Session on Tuesday, September 28, 2021.

Chairwoman Gray called the Teleconference Meeting to order at 12:51 p.m.

52518 Board Secretary Abdo administered the roll call. Those responding present were: Directors Abdo, Ackerman, Atwater, Blois, Butkiewicz, Camacho, Cordero, De Jesus, Dennstedt, Dick, Erdman, Faessel, Fellow, Goldberg, Gray, Hogan, Jung, Kurtz, Lefevre, Luna, McCoy, Morris, Murray, Ortega, Petersen, Peterson, Pressman, Ramos, Record, Repenning, Smith, and Tamaribuchi.

Those not responding were: Directors Apodaca, Hawkins, Kassakhian, Phan, and Williams.

Director Quinn responded after roll call.

Board Secretary Abdo declared a quorum present.

52519 Chairwoman Gray invited members of the public to address the Board on matters in this notice of Special Board meeting. No requests were made.

Director Pressman left the meeting.

52520 Chairwoman Gray called for a vote to adopt resolution authorizing remote teleconference meetings pursuant to the Brown Act Section 54953(E) for meetings of Metropolitan's legislative bodies for a period of 30 days from September 28, 2021 to October 28, 2021, as set forth in Agenda Item 5-1 board letter.

Director Peterson moved, seconded by Director Atwater that the Board approve Item 5-1.

The following is a record of the vote:

Record of Vote on Item: *5-1									
Member Agency	Total Votes	Director	Present	Yes	Yes Vote	No	No Vote	Abstain	Abstain Vote
Anaheim	5277	Faessel	x	x	5277				
Beverly Hills	4056	Pressman							
Burbank	2666	Ramos	x	x	2666				
Calleguas Municipal Water District	11552	Blois	x	x	11552				
Central Basin Municipal Water District	17051	Apodaca							
		Hawkins							
			Subtotal:						
Compton	553	McCoy	x	x	553				
Eastern Municipal Water District	9492	Record	x	x	9492				
Foothill Municipal Water District	2131	Atwater	x	x	2131				
Fullerton	2255	Jung	x	x	2255				
Glendale	3622	Kassakhian							
Inland Empire Utilities Agency	13433	Camacho	x	x	13433				
Las Virgenes	2741	Peterson	x	x	2741				
Long Beach	5772	Cordero	x	x	5772				
Los Angeles	70689	Murray	x	x	17672				
		Petersen	x	x	17672				
		Quinn	x						
		Luna	x	x	17672				
		Repenning	x	x	17672				
			Subtotal:		70689				
Municipal Water Dist. of Orange County	57264	Ackerman	x	x	14316				
		Tamaribuchi	x	x	14316				
		Dick	x	x	14316				
		Erdman	x	x	14316				
			Subtotal:		57264				
Pasadena	3522	Kurtz	x	x	3522				
San Diego County Water Authority	58302	Butkiewicz	x	x	14576				
		Goldberg	x	x	14576				
		Hogan	x	x	14576				
		Smith	x	x	14576				
			Subtotal:		58302				
San Fernando	224	Ortega	x	x	224				
San Marino	730	Morris	x	x	730				
Santa Ana	3035	Phan							
Santa Monica	4352	Abdo	x	x	4352				
Three Valleys Municipal Water District	7753	De Jesus	x	x	7753				
Torrance	3237	Lefevre	x	x	3237				
Upper San Gabriel Valley Mun. Wat.	11942	Fellow	x	x	11942				
West Basin Municipal Water District	23608	Williams							
		Gray	x	x	23608				
			Subtotal:		23608				
Western Municipal Water District	12466	Dennstedt	x	x	12466				
Total	337725				309961				
Present and not voting									
Absent	27764								

***Director Quinn's vote was not recorded.**

The motion to approve Item 5-1 passed by a vote of 309,961 ayes; 0 noes; 0 abstain; 0 not voting; and 27,764 absent.

Director Pressman returned to the meeting.

52521 Chairwoman Gray called the meeting into closed session to hear Agenda Item 5-2 a report on San Diego County Water Authority v. Metropolitan Water District of Southern California, et al., San Francisco County Superior Court Case Nos. CPF-10-510830, CPF-12-512466, CPF-14-514004, CPF-16-515282, CPF-16-515391, CGC-17-563350, and CPF-18-516389; the appeals of the 2010 and 2012 actions, Court of Appeal for the First Appellate District Case Nos. A146901, A148266, A161144, and A162168, and California Supreme Court Case No. S243500; the petition for extraordinary writ in the 2010 and 2012 actions, Court of Appeal for the First Appellate District Case No. A155310; the petition for extraordinary writ in the second 2016 action, Court of Appeal for the First Appellate District Case No. A154325 and California Supreme Court Case No. S251025; and the Metropolitan Water District of Southern California v. San Diego County Water Authority cross-complaints in the 2014 action, the first 2016 action, and the 2018 action; and authorize payment to San Diego County Water Authority for Water Stewardship Rate charges under the Exchange Agreement for 2015 to 2017 and statutory interest.

San Diego County Water Authority directors were placed in the waiting room.

Director Peterson left the meeting.

The meeting returned to open session and Chairwoman Gray stated that during closed session, the Board discussed and conferred with its legal counsel regarding Item 5-2; and no action was taken in closed session.

52522 Chairwoman Gray called for a vote for Agenda Item 5-2.

Director Morris moved, seconded by Director Ortega that the Board authorize payment to San Diego County Water Authority for Water Stewardship Rate charges under the Exchange Agreement for 2015 to 2017 and statutory interest. (Agenda Item 5-2)

The following is a record of the vote:

Record of Vote on Item *5-2:									
Member Agency	Total Votes	Director	Present	Yes	Yes Vote	No	No Vote	Abstain	Abstain Vote
Anaheim	5277	Faessel	x	x	5277				
Beverly Hills	4056	Pressman	x	x	4056				
Burbank	2666	Ramos	x	x	2666				
Calleguas Municipal Water District	11552	Blois	x	x	11552				
Central Basin Municipal Water District	17051	Apodaca							
		Hawkins							
		Subtotal:							
Compton	553	McCoy	x	x	553				
Eastern Municipal Water District	9492	Record	x	x	9492				
Foothill Municipal Water District	2131	Atwater	x	x	2131				
Fullerton	2255	Jung	x	x	2255				
Glendale	3622	Kassakhian							
Inland Empire Utilities Agency	13433	Camacho	x	x	13433				
Las Virgenes	2741	Peterson	x	x	2741				
Long Beach	5772	Cordero	x	x	5772				
Los Angeles	70689	Murray	x	x	17672				
		Petersen							
		Quinn	x	x	17672				
		Luna	x	x	17672				
		Repenning	x	x	17672				
		Subtotal:			70689				
Municipal Water Dist. of Orange County	57264	Ackerman	x	x	14316				
		Tamaribuchi	x	x	14316				
		Dick	x	x	14316				
		Erdman	x	x	14316				
		Subtotal:			57264				
Pasadena	3522	Kurtz	x	x	3522				
San Diego County Water Authority	58302	Butkiewicz	x						
		Goldberg	x						
		Hogan	x						
		Smith	x						
		Subtotal:							
San Fernando	224	Ortega	x	x	224				
San Marino	730	Morris	x	x	730				
Santa Ana	3035	Phan							
Santa Monica	4352	Abdo	x	x	4352				
Three Valleys Municipal Water District	7753	De Jesus	x	x	7753				
Torrance	3237	Lefevre	x	x	3237				
Upper San Gabriel Valley Mun. Wat.	11942	Fellow	x	x	11942				
West Basin Municipal Water District	23608	Williams							
		Gray	x	x	23608				
		Subtotal:			23608				
Western Municipal Water District	12466	Dennstedt	x	x	12466				
Total	337725				255715				
Present and not voting	58302								
Absent	23708								

***Directors Butkiewicz, Goldberg, Hogan, and Smith did not vote on this item.**

The motion to approve Item 5-2 passed by a vote of 255,715 ayes; 0 noes; 0 abstain; 58,302 not voting; and 23,708 absent.

52523 Chairwoman Gray asked if there were any follow-up items. No requests were made.

52524 Chairwoman Gray asked if there were any future agenda items. No requests were made.

52525 There being no objection, at 1:26 p.m., Chairwoman Gray adjourned the Meeting.



GLORIA D. GRAY
CHAIRWOMAN



JUDY ABDO
SECRETARY

THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

RESOLUTION NO. XXXX

**RESOLUTION OF THE BOARD OF DIRECTORS OF
THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA
RELYING ON GOVERNOR NEWSOM’S MARCH 4, 2020 PROCLAMATION OF A
STATE OF EMERGENCY
AND RE-AUTHORIZING REMOTE TELECONFERENCE MEETINGS OF THE
LEGISLATIVE BODIES OF THE METROPOLITAN WATER DISTRICT OF
SOUTHERN CALIFORNIA FOR THE PERIOD OF 30 DAYS FROM
OCTOBER 12, 2021 TO NOVEMBER 11, 2021 PURSUANT TO BROWN ACT
PROVISIONS**

WHEREAS, The Metropolitan Water District of Southern California (“Metropolitan”) is committed to preserving and nurturing public access and participation in meetings of the its legislative bodies; and

WHEREAS, all meetings of Metropolitan’s legislative bodies are open and public, as required by the Ralph M. Brown Act (Cal. Gov’t Code Sections 54950 – 54963), so that any member of the public may attend, participate, and watch the Metropolitan’s legislative bodies conduct their business; and

WHEREAS, the Brown Act, Government Code Section 54953(e), makes provisions for remote teleconferencing participation in meetings by members of a legislative body, without compliance with the requirements of Government Code Section 54953(b)(3), subject to the existence of certain conditions; and

WHEREAS, a required condition is that a state of emergency is declared by the Governor pursuant to Government Code Section 8625, proclaiming the existence of conditions of disaster or of extreme peril to the safety of persons and property within the state caused by conditions as described in Government Code Section 8558; and

WHEREAS, a proclamation is made when there is an actual incident, threat of disaster, or extreme peril to the safety of persons and property within the jurisdictions that are within the Metropolitan’s boundaries, caused by natural, technological, or human-caused disasters; and

WHEREAS, it is further required that state or local officials have imposed or recommended measures to promote social distancing, or, the legislative body meeting in person would present imminent risks to the health and safety of attendees; and

WHEREAS, the Board of Directors previously adopted Resolution Number 9285 on September 28, 2021, finding that the requisite conditions exist for the legislative bodies of Metropolitan to conduct remote teleconference meetings without compliance with paragraph (3) of subdivision (b) of section 54953; and

WHEREAS, as a condition of extending the use of the provisions found in section 54953(e), the Board of Directors must reconsider the circumstances of the state of emergency, and the Board of Directors has done so; and

WHEREAS, such conditions now persist at Metropolitan, specifically, Governor Newsom's March 4, 2020 Proclamation of A State of Emergency caused by the COVID-19 pandemic; and

WHEREAS, meeting in person would create conditions that would present imminent risks to the health and safety of the attendees due to the fact that that: (1) the community transmission rates and spread of the COVID-19 Delta variant remain high, both nationally and locally throughout Metropolitan's service area, (2) the Delta variant is highly contagious, more than two times as contagious as previous variants, (4) data suggests that the Delta variant might cause more severe illness than previous variants, and (5) the Centers for Disease Control and Prevention is recommending that everyone wear a mask in public and in indoor settings; and

WHEREAS, the Board of Directors does hereby find that the conditions described above has caused, and will continue to cause, conditions of peril to the safety of persons within Metropolitan that are likely to be beyond the control of services, personnel, equipment, and facilities of Metropolitan; and

WHEREAS, as a consequence of the state of emergency, the Board of Directors does hereby find that the legislative bodies of Metropolitan shall conduct their meetings without compliance with paragraph (3) of subdivision (b) of Government Code Section 54953, as authorized by subdivision (e) of Section 54953, and that such legislative bodies shall continue to comply with the requirements to provide the public with access to the meetings as prescribed in paragraph (2) of subdivision (e) of Section 54953; and

WHEREAS, Metropolitan is providing call-in telephonic access for the public to make comment and to listen; and providing livestreaming of the meetings over the internet to ensure access for the public.

NOW, THEREFORE, the Metropolitan Board of Directors does hereby resolve as follows:

Section 1. Recitals. The Recitals set forth above are true and correct and are incorporated into this Resolution by this reference.

Section 2. Reconsider the Circumstances of the State of Emergency Persists. The Board of Directors hereby reconsiders the conditions of the state of emergency and the Board of Directors hereby continues to rely on the Governor of the State of California's Proclamation of State of Emergency, effective as of its issuance date of March 4, 2020.

Section 3. State of Emergency Directly Impacts the Ability to Meet Safely in Person and Presents Imminent Risks. The Board hereby proclaims that the State of Emergency continues to directly impact the ability of members to meet safely in person and create conditions that would present imminent risks to the health and safety of the attendees due to the fact that: (1) the community transmission rates and spread of the COVID-19 Delta variant continue to remain

high, both nationally and locally throughout Metropolitan's service area, (2) the Delta variant is highly contagious, more than two times as contagious as previous variants, (3) data suggests that the Delta variant might cause more severe illness than previous variants, and (4) the Centers for Disease Control and Prevention is recommending that everyone wear a mask in public and in indoor settings.

Section 4. Remote Teleconference Meetings. The General Manager and legislative bodies of Metropolitan are hereby authorized and directed to take all actions necessary to carry out the intent and purpose of this Resolution including, conducting open and public meetings in accordance with Government Code Section 54953(e) and other applicable provisions of the Brown Act.

Section 5. Effective Date of Resolution. This Resolution shall take effect immediately upon its adoption and shall be effective until the earlier of (i) November 11, 2021, or such time the Board of Directors adopts a subsequent resolution in accordance with Government Code Section 54953(e)(3) to extend the time during which the legislative bodies of Metropolitan may continue to teleconference without compliance with paragraph (3) of subdivision (b) of section 54953.

I HEREBY CERTIFY that the foregoing is a full, true, and correct copy of a resolution adopted by the Board of Directors of The Metropolitan Water District of Southern California at its meeting held on October 12, 2021.

Secretary of the Board of Directors of
The Metropolitan Water District
of Southern California

**THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA**

RESOLUTION NO. 9287

**RESOLUTION OF THE BOARD OF DIRECTORS OF
THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA
RELYING ON GOVERNOR NEWSOM’S MARCH 4, 2020 PROCLAMATION OF A
STATE OF EMERGENCY
AND RE-AUTHORIZING REMOTE TELECONFERENCE MEETINGS OF THE
LEGISLATIVE BODIES OF THE METROPOLITAN WATER DISTRICT OF
SOUTHERN CALIFORNIA FOR THE PERIOD OF 30 DAYS FROM
OCTOBER 12, 2021 TO NOVEMBER 11, 2021 PURSUANT TO BROWN ACT
PROVISIONS**

WHEREAS, The Metropolitan Water District of Southern California (“Metropolitan”) is committed to preserving and nurturing public access and participation in meetings of the its legislative bodies; and

WHEREAS, all meetings of Metropolitan’s legislative bodies are open and public, as required by the Ralph M. Brown Act (Cal. Gov’t Code Sections 54950 – 54963), so that any member of the public may attend, participate, and watch the Metropolitan’s legislative bodies conduct their business; and

WHEREAS, the Brown Act, Government Code Section 54953(e), makes provisions for remote teleconferencing participation in meetings by members of a legislative body, without compliance with the requirements of Government Code Section 54953(b)(3), subject to the existence of certain conditions; and

WHEREAS, a required condition is that a state of emergency is declared by the Governor pursuant to Government Code Section 8625, proclaiming the existence of conditions of disaster or of extreme peril to the safety of persons and property within the state caused by conditions as described in Government Code Section 8558; and

WHEREAS, a proclamation is made when there is an actual incident, threat of disaster, or extreme peril to the safety of persons and property within the jurisdictions that are within the Metropolitan’s boundaries, caused by natural, technological, or human-caused disasters; and

WHEREAS, it is further required that state or local officials have imposed or recommended measures to promote social distancing, or, the legislative body meeting in person would present imminent risks to the health and safety of attendees; and

WHEREAS, the Board of Directors previously adopted Resolution Number 9285 on September 28, 2021, finding that the requisite conditions exist for the legislative bodies of Metropolitan to conduct remote teleconference meetings without compliance with paragraph (3) of subdivision (b) of section 54953; and

WHEREAS, as a condition of extending the use of the provisions found in section 54953(e), the Board of Directors must reconsider the circumstances of the state of emergency, and the Board of Directors has done so; and

WHEREAS, such conditions now persist at Metropolitan, specifically, Governor Newsom's March 4, 2020 Proclamation of A State of Emergency caused by the COVID-19 pandemic; and

WHEREAS, meeting in person would create conditions that would present imminent risks to the health and safety of the attendees due to the fact that that: (1) the community transmission rates and spread of the COVID-19 Delta variant remain high, both nationally and locally throughout Metropolitan's service area, (2) the Delta variant is highly contagious, more than two times as contagious as previous variants, (4) data suggests that the Delta variant might cause more severe illness than previous variants, and (5) the Centers for Disease Control and Prevention is recommending that everyone wear a mask in public and in indoor settings; and

WHEREAS, the Board of Directors does hereby find that the conditions described above has caused, and will continue to cause, conditions of peril to the safety of persons within Metropolitan that are likely to be beyond the control of services, personnel, equipment, and facilities of Metropolitan; and

WHEREAS, as a consequence of the state of emergency, the Board of Directors does hereby find that the legislative bodies of Metropolitan shall conduct their meetings without compliance with paragraph (3) of subdivision (b) of Government Code Section 54953, as authorized by subdivision (e) of Section 54953, and that such legislative bodies shall continue to comply with the requirements to provide the public with access to the meetings as prescribed in paragraph (2) of subdivision (e) of Section 54953; and

WHEREAS, Metropolitan is providing call-in telephonic access for the public to make comment and to listen; and providing livestreaming of the meetings over the internet to ensure access for the public.

NOW, THEREFORE, the Metropolitan Board of Directors does hereby resolve as follows:

Section 1. Recitals. The Recitals set forth above are true and correct and are incorporated into this Resolution by this reference.

Section 2. Reconsider the Circumstances of the State of Emergency Persists. The Board of Directors hereby reconsiders the conditions of the state of emergency and the Board of Directors hereby continues to rely on the Governor of the State of California's Proclamation of State of Emergency, effective as of its issuance date of March 4, 2020.

Section 3. State of Emergency Directly Impacts the Ability to Meet Safely in Person and Presents Imminent Risks. The Board hereby proclaims that the State of Emergency continues to directly impact the ability of members to meet safely in person and create conditions that would present imminent risks to the health and safety of the attendees due to the fact that: (1) the community transmission rates and spread of the COVID-19 Delta variant continue to remain

high, both nationally and locally throughout Metropolitan's service area, (2) the Delta variant is highly contagious, more than two times as contagious as previous variants, (3) data suggests that the Delta variant might cause more severe illness than previous variants, and (4) the Centers for Disease Control and Prevention is recommending that everyone wear a mask in public and in indoor settings.

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Section 5. Effective Date of Resolution. This Resolution shall take effect immediately upon its adoption and shall be effective until the earlier of (i) November 11, 2021, or such time the Board of Directors adopts a subsequent resolution in accordance with Government Code Section 54953(e)(3) to extend the time during which the legislative bodies of Metropolitan may continue to teleconference without compliance with paragraph (3) of subdivision (b) of section 54953.

I HEREBY CERTIFY that the foregoing is a full, true, and correct copy of a resolution adopted by the Board of Directors of The Metropolitan Water District of Southern California at its meeting held on October 12, 2021.

A handwritten signature in black ink, appearing to read "Judy Alsdo". The signature is fluid and cursive, with the first name "Judy" and the last name "Alsdo" clearly distinguishable.

Secretary of the Board of Directors of
The Metropolitan Water District
of Southern California



- Board of Directors
Facilities Naming Ad Hoc Committee

10/12/2021 Board Meeting

7-1

Subject

Approve the nomination and naming of the overlook at Lake Mathews in honor of former Metropolitan Director Donald “Don” Galleano; the General Manager has determined that this action is exempt or otherwise not subject to CEQA

Executive Summary

Metropolitan’s Facilities Naming Policy Principle establishes approved standard criteria and procedures to submit a naming request for consideration by Metropolitan’s Board. Director Randy Record, who represents Eastern Municipal Water District, submitted a nomination to name the overlook at Lake Mathews for former Metropolitan Board member Don Galleano, Western Municipal Water District’s representative on the Metropolitan Board who passed away on June 2, 2021. This board action is to approve this nomination and the naming of the specified facility.

Details

Background

The Metropolitan Water District of Southern California is responsible for its facilities, including construction of new facilities, and operations and maintenance of existing facilities. A Metropolitan facility may be named or renamed after an individual, group of individuals or an organization. The primary criteria for naming or renaming a Metropolitan facility is to honor an individual, group of individuals, or organization that has or have had a substantial, important and positive impact upon Metropolitan as a member of its Board or as an employee, and/or demonstrated civic achievements of the highest distinction while maintaining close ties with and providing significant support to Metropolitan, and/or the water industry.

The overlook at Lake Mathews is located off La Sierra Avenue at the entrance to the Lake Mathews Administration Building.

Donald “Don” Galleano Nomination

Don Galleano served on the Metropolitan Board of Directors from May 2015 until his passing in June 2021. He had served on the Western Municipal Water District (Western MWD) Board of Directors since 2004, representing the cities of Eastvale, Jurupa Valley, and Norco and the communities of Mira Loma, Rubidoux and Glen Avon. As an advocate for regional water solutions, he worked to secure reliable water supplies for the area, which aided in the formation of Eastvale and Jurupa Valley.

A respected vintner, Don Galleano owned Cantu-Galleano Ranch in Mira Loma, home to the Galleano Winery, a dry farming and completely organic operation. The ranch was founded by his family in 1927 and is listed on the National Register of Historic Places.

Western MWD attested to Don Galleano’s deep appreciation for the beauty, enormity, and historical significance of Lake Mathews as the original terminal reservoir for the Colorado River Aqueduct. He reportedly made monthly visits to the reservoir to monitor lake levels, providing updates to Metropolitan staff.

During his Metropolitan tenure, Don Galleano served on the Agriculture and Industry Relations Committee, Communications and Legislation Committee, Engineering and Operations Committee, Integrated Resources Plan Special Committee, and the Organization, Personnel and Technology Committee.

Prior to joining Western MWD's board, he served for nearly 25 years on the board of Jurupa Community Services District. Don Galleano also served on the boards of directors of the Chino Basin Watermaster, the Los Angeles County Fair Association, the Western Riverside County Businessman's Association, the Jurupa Chamber of Commerce, and the Santa Ana Watershed Project Authority.

Previous Metropolitan Actions

Following the approval of a Facilities Naming Policy Principle in 2018, the Board voted in January 2019 to name the East Dam of Diamond Valley Lake after former Metropolitan General Manager and General Counsel Carl Boronkay. In July 2019, the Board voted to name the Lake Mathews Multiple Species Reserve in honor of former Metropolitan Board Chair Lois B. Krieger, who represented Western MWD on the Board. Prior to the formulation of the Facilities Naming Policy Principle, Metropolitan had dedicated the courtyard at Metropolitan Headquarters at Union Station in honor of former Board Chair John V. "Jack" Foley in November 2014, while 10 years earlier, the West Dam at Diamond Valley Lake (DVL) was dedicated in memory of Langdon "Don" Owen, former Metropolitan director representing the Municipal Water District of Orange County. In June 2001, the Board approved a resolution to rename the DVL Overlook in honor of former Metropolitan Board vice chairman Clayton A. Record, Jr.

Attachment 1 provides the Donald "Don" Galleano nomination packet. **Attachment 2** provides an aerial photo of the outlook at Lake Mathews in relation to the Lake Mathews Administration Building.

Policy

Metropolitan Water District Administrative Code Section 11104: Delegation of Responsibilities

By Minute Item 51324, dated September 11, 2018, the Board-adopted Metropolitan's facilities naming policies and procedures: Metropolitan Facilities Naming Policy Principle.

California Environmental Quality Act (CEQA)

CEQA determination for Option #1:

The proposed action is not defined as a project under CEQA because it involves organizational and administrative activities that will not result in direct or indirect physical changes in the environment (Section 15378(b)(5) of the State CEQA Guidelines). In addition, the proposed action is not subject to CEQA because it can be seen with certainty that it will not cause a significant effect on the physical environment (Section 15061(b)(3) of the State CEQA Guidelines).

CEQA determination for Option #2:

None required

Board Options

Option #1

Approve the nomination and naming of the overlook at Lake Mathews in honor of Donald "Don" Galleano.

Fiscal Impact: Minimal costs. Staff work would be needed to design and install signage at the facility and to add the name to maps, planning and operations documents, websites, and informational material as necessary.

Business Analysis: Naming the overlook at Lake Mathews in honor of Mr. Galleano will demonstrate the substantial importance and positive impact, and civic achievements of the highest distinction of this individual to Metropolitan and the Riverside County region.

Option #2

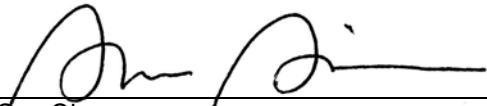
Do not approve the nomination.


Fiscal Impact: None

Business Analysis: Metropolitan would forgo the opportunity to acknowledge the importance and impact, and civic achievements of Mr. Galleano to Metropolitan and the Riverside County region.

Staff Recommendation

Option #1


Sue Sims
External Affairs Manager
8/27/2021
Date


Adel Hagekhalil
General Manager
9/1/2021
Date

Attachment 1 – Donald “Don” Galleano nomination packet

Attachment 2 – Aerial photo of the overlook at Lake Mathews

Ref# ea12681319



THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Metropolitan Facilities Naming Request Form

It is the policy of The Metropolitan Water District of Southern California ("Metropolitan") acting through its Board of Directors to name and rename facilities. The naming and renaming criteria and procedures are available in the **Metropolitan Facilities Naming Policy Principle**. This form shall be used by an individual, groups of individuals or organization proposing names for new Metropolitan facilities or the renaming of existing Metropolitan facilities.

1. Name for consideration: _____

- ☐ Board to select appropriate Metropolitan facility
- ☐ Facility proposed for naming or renaming: _____

2. The criteria which the proposed name meets or satisfies: (check all that apply)

- ☐ Substantial, important and positive impact upon Metropolitan as a member of its Board or staff
- ☐ Personal achievements of highest distinction in a public service role, while maintaining close ties with and providing significant support to Metropolitan
- ☐ Names that have historical or regional significance to the facility or location, ordinarily not for living persons
- ☐ Other: _____

3. Provide supporting documentation, as available:

- a. A memorandum giving the particulars of the naming request that includes the rationale for the naming, referring to relevant criteria;
- b. Background and information about the individual, group of individuals, or organization for which the facility is to be named or renamed;
- c. Letters of support for this request;
- d. Other information that may be relevant to the potential implementation of the request such as historical photographs and articles;
- e. A list of other facilities named, or being proposed to be named or renamed after the same individual, group of individuals or organizations, including location and date.

You may be contacted by Metropolitan staff for additional information, if needed.

Name of Requestor: _____

Mailing Address: _____

Telephone: _____ **Email:** _____

Signature: _____ **Date:** _____

Please mail this application and supporting documents to: Metropolitan Board of Directors, P.O. 54153, Los Angeles, CA 90054-053 or ssims@mwdh2o.com

Metropolitan Water District of Southern California
Facilities Naming Request Form

August 10, 2021

The Honorable Gloria Gray
Chair, Metropolitan Water District Board of Directors
700 Alameda St.
Los Angeles, CA 90012

RE: Western Municipal Water District support for renaming of Lake Mathews Overlook after Don Galleano

Dear Chairwoman Gray,

On behalf of Western Municipal Water District (Western), my fellow board members, Western staff, and the nearly 1 million customers we serve in western Riverside County, I would like to express our strong support for the renaming of the Overlook at Lake Mathews after our recently departed board member, colleague, and friend, Don Galleano.

Director Galleano was elected to Western's Board of Directors in 2004, where he represented Western's Division 4 that included the communities of Eastvale, Jurupa Valley, and Norco. He also acted on behalf of Western at the Chino Basin Watermaster and Santa Ana Watershed Project Authority. Prior to Director Galleano's election to Western, he served on the Jurupa Community Services District Board of Directors from 1982 to 2004. This makes his total time in elected public office almost 40 years, which he served with pride, distinction and integrity. One particular skill Director Galleano was known for was his ability to have people with differing opinions come to the decision-making table and resolve extremely complex and challenging issues.

As you know, Director Galleano was appointed to the Metropolitan Water District (Metropolitan) Board of Directors to represent Western beginning in 2015. Director Galleano was a visionary who never forgot about his role in providing his voice for the future generations of people who would benefit from the difficult choices Metropolitan has made over the years. He advocated for smart water policy and believed in the importance of investing in a diverse water portfolio that makes our region more resilient. Even now, as we make our way through this current drought, the policy decisions made by Director Galleano and his fellow Metropolitan board members are being felt in a positive way for all Southern Californians.

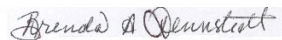
Director Galleano was a third-generation winegrower at the Historic Cantú-Galleano Ranch, home to Galleano Winery. This highly acclaimed dry farming operation remains a testament to his commitment to water sustainability. He also served the community in several ways. He was a past president of the Western Riverside County Businessman's Association and the Jurupa Chamber of Commerce and served on the National Orange Show Foundation Board, the Los Angeles County Fair Association Board, and Pacific Rim Wine Competition. His interest in and service to these many diverse fields made Director Galleano uniquely qualified to represent all the varied perspectives of those he represented – people, farmers, businesses and the environment. He was an important figure in the development of regional water solutions, and his work securing water for the area helped lay the groundwork for the formation of the cities of Eastvale and Jurupa Valley.

In contemplating a way to honor Director Galleano, the renaming of the Overlook at Lake Mathews is fitting. Director Galleano was always an advocate for policymakers to think of the bigger picture when making decisions, as he knew today's decisions would affect generations to come. As the terminus of the Colorado Aqueduct, Lake Mathews represents this ideal well when Metropolitan decided to bring water from the Colorado River to Southern California. Additionally, on all of the Metropolitan Inspection Trips he hosted, Director Galleano could be found deeply taking in the sights of those investments his Metropolitan board member colleagues have made, both past and present. Director Galleano was passionate about Lake Mathews, both for its beauty and enormity as well as its significance in the water supply of Southern California. He visited his beloved Lake Mathews every month to monitor lake levels and take pictures of signage, and then promptly send them to Metropolitan staff to be sure they were "in the loop." I have no doubt his spirit frequently visits places such as the Overlook

at Lake Mathews and know that, while a modest person, he would appreciate such a gesture from an agency he so highly regarded.

I thank Director Randy Record from Eastern Municipal Water District for initiating the renaming of the Overlook at Lake Mathews after Director Galleano and fully support this way of honoring Director Galleano's life and legacy to the region.

Very Respectfully,

A handwritten signature in cursive script that reads "Brenda A. Dennstedt". The signature is written in dark ink on a light-colored background.

BRENDA DENNSTEDT
President, Board of Directors

Cc: Honorable Board Members, Metropolitan Water District
Adel Hagekhalil, General Manager, Metropolitan Water District

Attachment 2 - Aerial photo of the overlook at Lake Mathews

10/12/2021 Board Meeting

7-1

Attachment 2, Page 1 of 1





Approve nomination and naming of the overlook at Lake Mathews in honor of Donald Galleano

Facilities Naming Ad Hoc Committee

Item #7-1

September 14, 2021

Overview

- Metropolitan's Facilities Naming Policy Principle establishes approved standard criteria and procedures to submit a naming request for consideration
- In January 2019, the Board approved naming the East Dam at Diamond Valley Lake after former GM/General Counsel Carl Boronkay
- In July 2019, the Board approved naming the Lake Mathews Multiple Species Reserve after former Chairwoman Lois B. Krieger

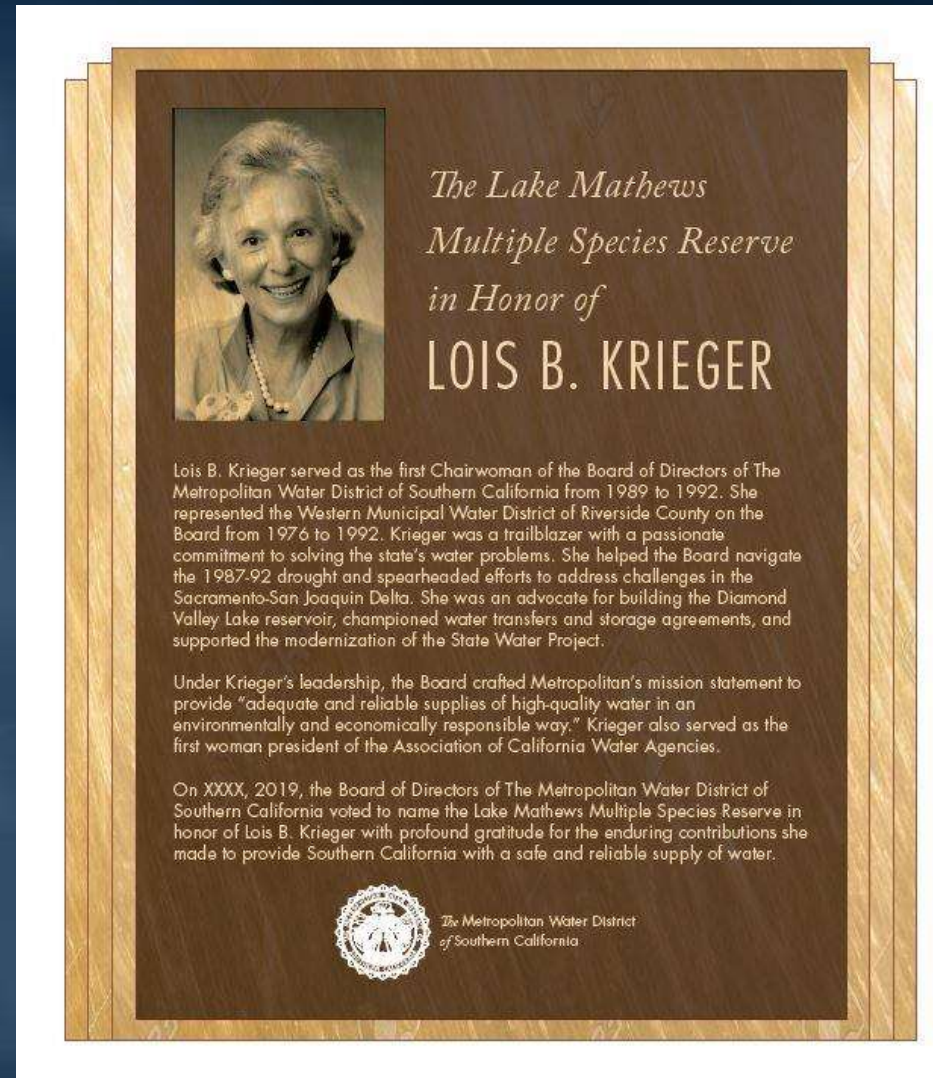
Donald Galleano: Naming Recommendation

- On July 25, 2021, Director and former Board Chairman Randy Record of Eastern Municipal Water District submitted nomination to name the overlook at Lake Mathews after Galleano
- On August 10, 2021, Western Municipal Water District provided a letter of support for the nomination

Proposed Site Location



Sample Plaque



Board Options

- Option 1

Approve nomination and naming of the overlook at Lake Mathews in honor of Donald Galleano

- Option 2

Do not approve the nomination

Staff Recommends

- Option 1





- Board of Directors
Engineering and Operations Committee

10/12/2021 Board Meeting

7-2

Subject

Award a \$3,815,000 contract to Creative Home dba Chi Construction to replace the wastewater system at the Lake Mathews facility; the proposed action is in furtherance of a project that was previously determined to be exempt or otherwise not subject to CEQA

Executive Summary

The septic tank and leach field-based wastewater system at Metropolitan's Lake Mathews facility has been in operation for 80 years and is no longer reliable. Despite receiving regular maintenance, the system is exhibiting signs of failure, including plumbing and septic tank backups, clogged leach fields, and slow-draining collection pipes. This action awards a contract to replace the wastewater collection system at Lake Mathews and connect to a nearby municipal sewer system.

Details

Background

An on-site wastewater system serves the maintenance buildings, administrative offices, and repair shops at Metropolitan's Lake Mathews facility. The system was installed during the reservoir's original construction in the 1930s and was expanded significantly in the 1960s. At that time, no municipal sewer system was available in the area.

The facility's wastewater system has three components: community septic tanks and leach fields; collector lines that convey wastewater from multiple facilities to the septic tanks; and sewer laterals that convey wastewater from individual buildings to the collector lines. At each septic tank, solid waste settles to the bottom of several chambers, where it undergoes biological treatment. The solids are periodically removed by pump trucks, while the liquid effluent from the tanks is dispersed through perforated pipes into subsurface soils at the leach fields. The wastewater system includes five community septic tanks and approximately 6,000 feet of collector lines and sewer laterals.

While the existing system has received regular maintenance, it is deteriorating and showing signs of potential failure. There have been repeated instances of slow-draining sinks and toilets, clogged pipes, septic tank backups, and clogged leach fields. In order to maintain reliability and reduce the risk of costly unplanned repairs, the existing wastewater system should be replaced. In recent years, residential development in the areas adjacent to Lake Mathews has begun to approach the reservoir complex. This development has brought with it the expansion of the area's municipal wastewater collection system, which is owned and operated by the Western Municipal Water District (Western). As part of this project, the existing collector lines and laterals within the Lake Mathews reservoir complex will be replaced, and the overall system will be connected to the nearby public wastewater collection system.

In April 2018, Metropolitan's Board authorized final design to replace the wastewater system at Lake Mathews. Design is complete, and staff recommends the award of a construction contract at this time.

In accordance with the April 2020 action on the biennial budget for fiscal years 2020/21 and 2021/22, the General Manager will authorize staff to proceed with the replacement of the Lake Mathews wastewater system, pending board award of the contract described below. Based on the current Capital Investment Plan (CIP) expenditure

forecast, funds for the work to be performed pursuant to this action during the current biennium are available within the Capital Investment Plan Appropriation for Fiscal Years 2020/21 and 2021/22 (Appropriation No. 15517). Funds required for work to be performed pursuant to the subject contract after fiscal year 2021/22 will be budgeted within the Capital Investment Plan Appropriation for Fiscal Years 2022/23 and 2023/24. This project has been reviewed in accordance with Metropolitan's CIP prioritization criteria and was approved by Metropolitan's CIP evaluation team to be included in the Distribution System Reliability Program.

Lake Mathews Site Wastewater System Replacement – Construction

The scope of construction includes removal of existing wastewater collector lines, septic tanks, leach fields, and accessways; installation of new collector lines, accessways, and cleanouts; connection of the new lines to existing facilities and to the Western sewer main; traffic control; and site restoration.

A total of \$5.425 million is required for this work. In addition to the amount of the contract described below, other funds to be allocated include \$446,000 for construction inspection; \$248,000 for submittal review, technical support during construction, responding to requests for information, and preparation of record drawings; \$150,000 for connection and impact fees; \$292,000 for contract administration and project management; and \$474,000 for remaining budget.

Attachment 1 provides the allocation of the required funds. The total estimated cost of Lake Mathews wastewater system replacement, including the amount allocated to date and funds allocated for the work described in this action, is approximately \$6.5 million.

Award of Construction Contract (Creative Home dba Chi Construction)

Specification No. 1944A for the Lake Mathews wastewater system replacement was advertised for bids on July 29, 2021. As shown in **Attachment 2**, three bids were received and opened on September 1, 2021. The low bid from Creative Home dba Chi Construction in the amount of \$3,815,000, complies with the requirements of the specifications. The other bids ranged from \$3,904,458.88 to \$4,153,720, while the engineer's estimate for this project was \$4,970,000. Staff investigated the difference between the low bid and the engineer's estimate and attributes the difference to the bidder's intent to the expanded use of power equipment to excavate non-rippable earth material, and this practice is anticipated to avoid delays and cost increases when compared to other rock excavation methods. For this contract, Metropolitan established a Small Business Enterprise (SBE) participation level of at least 25 percent of the bid amount. Creative Home dba Chi Construction is an SBE firm and thus achieves 100 percent participation. The subcontractors for this contract are listed in **Attachment 3**. This action awards a \$3,815,000 contract to Creative Home dba Chi Construction for Lake Mathews Site Wastewater System Replacement.

As described above, Metropolitan staff will perform construction management and inspection. Engineering Services' performance metric target range for inspection of projects with construction greater than \$3 million is 9 to 12 percent. For this project, the performance metric goal for inspection is 11.7 percent of the total construction cost. The total cost of construction for this project is \$3,815,000.

Alternatives Considered

During design, staff examined the feasibility of replacing the existing septic system in-kind, including wastewater pipes, septic tanks, and leach fields. However, this alternative requires additional maintenance and contracting activities to keep the system operating in a reliable manner. In addition, a septic system provides a potential source of contamination of water stored in Lake Mathews. Overall, a new wastewater system that connects directly to Western's main sewer line provides a long-term reliable, safe, and cost-effective approach when compared to the septic system.

Summary

This action awards \$3,815,000 to Creative Home dba Chi Construction for Lake Mathews Wastewater System Replacement. See **Attachment 1** for the Allocation of Funds, **Attachment 2** for the Abstract of Bids, **Attachment 3** for the listing of Subcontractors for Low Bidder, and **Attachment 4** for the Location Map.

Project Milestone

February 2023 – Complete construction

Policy

Metropolitan Water District Administrative Code Section 8121: General Authority of the General Manager to Enter Contracts

Metropolitan Water District Administrative Code Section 11104: Delegation of Responsibilities

By Minute Item 51190, dated May 08, 2018, the Board authorized final design to replace the Lake Mathews Wastewater System.

By Minute Item 51963, dated April 13, 2020, the Board appropriated a total of \$500 million for projects identified in the Capital Investment Plan for Fiscal Years 2020/21 and 2021/22.

California Environmental Quality Act (CEQA)

CEQA determination for Option #1:

The project was determined by the Board to be categorically exempt under Classes 1, 2, and 4 (Sections 15301, 15302, and 15304 of the State CEQA Guidelines) on May 8, 2018. With the current action, there is no substantial change proposed since the original project was first approved in 2018. Hence, the previous environmental documentation in conjunction with the project fully complies with CEQA and the State CEQA Guidelines. Accordingly, no further CEQA documentation is necessary for the Board to act with regard to the proposed action.

CEQA determination for Option #2:

None required

Board Options

Option #1

Award \$3,815,000 contract to Creative Home dba Chi Construction for Lake Mathews Site Wastewater System Replacement.

Fiscal Impact: Expenditure of \$5.425 million in capital funds. Approximately \$0.5 million will be incurred in the current biennium and has been previously authorized.

Business Analysis: This project will provide reliable and efficient disposal of wastewater at the Lake Mathews facility in compliance with local codes and environmental regulations.

Option #2

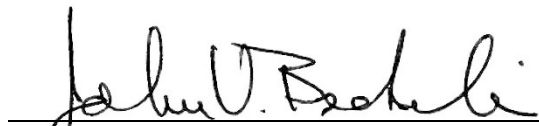
Do not proceed with the project at this time.

Fiscal Impact: None.

Business Analysis: This option would forgo an opportunity to reduce the risk of costly unplanned repairs.

Staff Recommendation

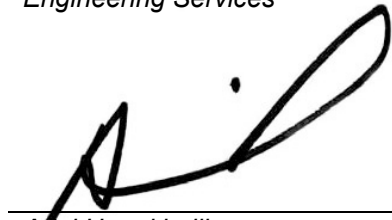
Option #1



John V. Bednarski
Manager/Chief Engineer
Engineering Services

9/22/2021

Date



Adel Hagekhalil
General Manager

9/29/2021

Date

Attachment 1 – Allocation of Funds

Attachment 2 – Abstract of Bids

Attachment 3 – List of Subcontractors

Attachment 4 – Location Map

Ref# es12674832

Allocation of Funds for the Lake Mathews Site Wastewater System Replacement

	Current Board Action (Oct. 2021)
Labor	
Studies & Investigations	\$ -
Final Design	-
Owner Costs (Program mgmt., envir. monitoring)	292,000
Submittals Review & Record Drwgs.	248,000
Construction Inspection & Support	446,000
Metropolitan Force Construction	-
Materials & Supplies	-
Incidental Expenses (Connection fees & permits)	150,000
Professional/Technical Services	-
Right-of-Way	-
Equipment Use	-
Contracts	-
Creative Home dba Chi Construction	3,815,000
Remaining Budget	474,000
Total	<u>\$ 5,425,000</u>

The total amount expended to date is approximately \$1.04 million. The total estimated cost to complete this project, including the amount appropriated to date and funds for the work described in this action, is \$6.5 million.

The Metropolitan Water District of Southern California
Abstract of Bids Received on September 1, 2021, at 2:00 P.M.
Specifications No. 1944A
Lake Mathews Site Wastewater System Replacement

The work consists of replacement of the existing sewer collection systems including sewer pipe, cleanouts, and septic tanks; and installation of new sewer mains, laterals, manholes, cleanouts, and connection to the local sewer system.

Engineer's estimate: \$4.97 million

Bidder and Location	Total	SBE \$	SBE %	Met SBE ¹
Creative Home dba Chi Construction Anaheim, CA	\$3,815,000.00	\$3,815,000	100%	Yes
Trinity Construction Blue Jay, CA	\$3,904,458.88	-	-	-
CEM Construction, Corp. Montebello, CA	\$4,153,720.00	-	-	-

¹ Small Business Enterprise (SBE) participation level established at 25% for this contract.

The Metropolitan Water District of Southern California**Subcontractors for Low Bidder****Specifications No. 1944A****Lake Mathews Site Wastewater System Replacement**

Low bidder: Creative Home dba Chi Construction

Subcontractor and Location
Manhole Builders, Inc. Corona, CA
Brickley Environmental San Bernardino, CA





Lake Mathews Site Wastewater System Replacement

Engineering and Operations Committee

Item 7-2

October 11, 2021

Current Action

- Award \$3,815,000 contract to Creative Home dba Chi Construction to replace the wastewater system at Lake Mathews facility

Distribution System



Aerial view



Damaged Wastewater Line

Alternatives Considered

- In-kind replacement of existing septic tanks, wastewater pipes, & leach fields
 - Continued requirements for maintenance & contracting activities to keep system operating in a reliable manner
- Replace the existing system with lateral collection system - selected option
 - Connects directly to Western Municipal Water District
 - Minimizes system maintenance by in-house staff and contracts
 - Provides reliable, safe, & cost-effective system compared to septic system

Proposed Improvement



Contractor Scope

- Removal of existing wastewater collector lines, septic tanks, leach fields, & accessways
- Install approximately 7,000 ft of new wastewater line
- Install 35 new accessways
- Connect new lines to existing facilities & Western Municipal Water District sewer main
- Traffic control & site restoration



New Wastewater Line

Metropolitan Scope

- Construction inspection
- Submittal review
- Technical support
- Respond to requests for information
- Provide project management & contract administration

Bid Results

Specifications No. 1944A

Bids Received	September 1, 2021
No. of Bidders	3
Low Bidder	Creative Home dba Chi Construction
Low Bid	\$3,815,000
Range of Higher Bids	\$3,904,458 to \$4,153,720
Engineer's estimate	\$4,970,000
SBE Participation*	100%

*SBE (Small Business Enterprise) participation level set at 25%

Allocation of Budgeted Funds

Contract

Creative Home dba Chi Construction	\$3,815,000
------------------------------------	-------------

Metropolitan Labor

Construction Inspection	446,000
-------------------------	---------

Submittal review, technical support & record drwgs.	248,000
--	---------

Contract admin., envir. support, & proj. management	292,000
--	---------

Incidental Expenses (Connection & Permit Fees)	150,000
--	---------

Remaining Budget	474,000
------------------	---------

Total	\$5,425,000
-------	-------------

Project Schedule



Board Options

- Option #1
 - Award \$3,815,000 contract to Creative Home dba Chi Construction for Lake Mathews Site Wastewater System Replacement.
- Option #2
 - Do not proceed with the project at this time.

Staff Recommendation

- Option #1





● **Board of Directors**
Engineering and Operations Committee

10/12/2021 Board Meeting

7-3

Subject

Authorize an agreement with Helix Environmental Planning, Inc., in an amount not to exceed \$2.8 million, to prepare environmental documentation for the Regional Recycled Water Program and an agreement with Stantec Consulting Services Inc., in an amount not to exceed \$6.5 million for engineering and technical studies to support the environmental planning phase of the Program; the General Manager has determined that the proposed action is exempt or otherwise not subject to CEQA

Executive Summary

The challenges and risks associated with recurring drought conditions, ongoing climate change, and underlying seismic risks to the region have underscored the need to develop additional local water supplies. In response to these challenges, Metropolitan initiated the environmental planning phase of the Regional Recycled Water Program (Program) in November 2020. The objective of the Program is to develop a new local resource that will increase future water supply reliability for the Southern California region. In order to complete the environmental planning phase as currently envisioned, staff recommends the award of two professional services agreements. This action authorizes a consulting agreement to provide specialized expertise for the preparation of environmental documentation for the full Program. This action also authorizes a second consulting agreement to provide specialized engineering and technical studies related to the Program's advanced water treatment (AWT) facilities in support of the environmental planning efforts.

Details

Background

In November 2015, Metropolitan's Board authorized an agreement with the Los Angeles County Sanitation District No. 2 (Sanitation District) to establish a partnership between Metropolitan and the Sanitation District in developing a new local resource that would help address the effects of the unprecedented drought conditions experienced in California. The Program's goal is to produce purified water for reuse applications such as groundwater recharge, industrial uses, and future direct potable use (DPR) through raw water augmentation at Metropolitan's water treatment plants. The Sanitation District provides wastewater and solid waste management for approximately 5.3 million people in Los Angeles County. The largest treatment plant in the system, the Joint Water Pollution Control Plant (Joint Plant), located in Carson, California, has a capacity of 400 million gallons of water per day (mgd) and an average daily flow of approximately 260 mg.

Treated secondary effluent from the Joint Plant is currently discharged through outfall tunnels to the Pacific Ocean in accordance with ocean discharge regulations. The Program would instead capture that water and treat it for beneficial reuse, adding a significant new water supply to Metropolitan's service area. The Program is currently envisioned to initially produce approximately 150 mgd of purified water for reuse under a two-phase approach. The ultimate capacity of the Program would be determined by the availability of source water from the Joint Plant, the anticipated demands by the member agencies for groundwater replenishment, industrial uses, and potential DPR applications, and the pending development and approval of DPR regulations by the state.

In November 2020, Metropolitan's Board authorized an amendment to the existing agreement with the Sanitation District to support further development and evaluation of the Program and preparation of environmental documentation, technical studies, and public outreach for the Program. Agreements were authorized in June 2021 and August 2021 for engineering and technical services related to the Program's conveyance and AWT demonstration facilities, respectively. Agreements for preparation of environmental documentation for the full Program and engineering and technical studies related to the Program's AWT facilities are needed at this time.

In accordance with the April 2020 action on the biennial budget for fiscal years 2020/21 and 2021/22 and the November 2020 action to initiate the environmental planning phase of the Program, the General Manager authorized staff to proceed with planning phase activities for the Program using Metropolitan's O&M funds budgeted for this purpose. The two agreements that are the subject of this board action, and the consulting agreement that was authorized by the Board in June 2021, will be utilized to complete the technical studies and environmental planning efforts for the Program. The total estimated cost to complete these engineering and technical studies, outreach, and environmental documentation is \$30 million. Funds for these planning activities for the Program are included in the O&M budget for fiscal years 2020/21 and 2021/22.

Similar to the current demonstration testing of membrane bioreactor for potable reuse, the effectiveness of the proposed treatment train for DPR must be demonstrated and approved by the regulators before its full-scale implementation. Modifications to the existing AWT Demonstration Facility at the Joint Plant to include additional DPR treatment options, such as ozonation and biological activated carbon, are planned to start in 2022 to accommodate testing of potential processes and facilitate collection of required information for regulatory acceptance.

In accordance with the April 2020 action on the biennial budget for fiscal years 2020/21 and 2021/22, the General Manager will authorize staff to proceed with the design of facility modifications to the existing AWT Demonstration Facility for DPR demonstration testing purpose, pending board award of the Engineering Services contract below. Based on the current Capital Investment Plan (CIP) expenditure forecast, funds for the work to be performed pursuant to this action during the current biennium are available within the CIP Appropriation for Fiscal Years 2020/21 and 2021/22 (Appropriation No. 15517). This project is identified in the CIP Appendix for Fiscal Years 2020/21 and 2021/22 as a part of the Regional Recycled Water Program. Funds required for work to be performed pursuant to the subject contract after Fiscal Year 2021/22 will be budgeted within the Capital Investment Plan Appropriation for Fiscal Years 2022/23 and 2023/24.

Environmental Planning Support for the Regional Recycled Water Program

Environmental planning activities for the full-scale Program include technical studies and analyses for the preparation of a Program Environmental Impact Report (PEIR) in accordance with the California Environmental Quality Act (CEQA) and the State CEQA Guidelines. The PEIR will allow Metropolitan to consider broad policy alternatives and program-wide mitigation measures early in the Program's development and will provide greater flexibility to consider alternatives to avoid, minimize, and develop mitigation measures for identified impacts. Supplemental documents to address project-specific elements that are not addressed in the PEIR would be prepared in a later phase and are not included in this board action.

In addition to the PEIR, to take advantage of potential low-interest loans and grants from the State Revolving Funds (SRF) and other federal funding sources, a "CEQA-Plus" analysis will be prepared to comply with federal cross-cutting requirements for SRF and federal funds. Presently, it is not anticipated that additional National Environmental Policy Act (NEPA) compliance will be required to complete PEIR development and certification for the Program during this phase of work. If any impact on resources within federal jurisdiction is identified, the impacted federal agency will assess the environmental effects of the proposed action and any reasonable alternatives before deciding on whether and/or how to proceed with NEPA compliance. Metropolitan's consultant for environmental support services, identified below, would assist Metropolitan in providing NEPA support to the appropriate federal agency.

Engineering and Technical Studies for the AWT Facilities

Specialized engineering and technical studies are required to identify and evaluate potential Program alternatives and develop key design criteria under State CEQA Guidelines. Two agreements have been previously authorized for studies related to the conveyance and AWT demonstration facilities. The Sanitation District is currently

evaluating options to remove nitrogen from the Joint Plant's primary or secondary effluent, which would significantly reduce the downstream treatment requirements at an AWT facility and provide potential cost savings for the Program. Recommendations from these technical analyses will be considered during the Program's environmental planning phase, along with the results of demonstration testing.

Additional studies and investigations are needed to further develop the recommended AWT process; prepare a full-scale conceptual plan of the AWT facilities; explore potential DPR facility sites and treatment technologies for raw water augmentation at Metropolitan's water treatment plants; and evaluate power and energy sustainability to address regulatory, operational, and construction impacts. Information collected from the studies will also be utilized to support the preparation of environmental documentation, as described below.

Environmental Planning Support (Helix Environmental Planning, Inc.) – New Agreement

Helix Environmental Planning, Inc. (Helix) is recommended to prepare environmental documentation in compliance with CEQA, "CEQA-Plus," and potentially NEPA, as described above. Helix was selected through a competitive process via Request for Proposals No. 1285 based on the firm's specific experience in analyzing and addressing impacts and in preparing environmental documents of a similar scope for large-scale and complex projects within California on behalf of public agencies.

The specialized environmental planning services include: (1) development of a comprehensive project description in coordination with Metropolitan and the Sanitation District; (2) assessment of a reasonable range of potential alternatives in accordance with State CEQA Guidelines; (3) assessment of potential environmental impacts of the Program's construction and operation; (4) development of feasible mitigation measures to reduce or avoid significant environmental impacts; (5) management and distribution of all notices and documents in compliance with State CEQA Guidelines; (6) preparation of a "CEQA-Plus" analysis in accordance with federal cross-cutting requirements for SRF and federal funds; (7) technical support for public hearings, scoping meetings, and regulatory permit evaluation; and (8) preparation of a PEIR in compliance with State CEQA Guidelines.

This action authorizes a new agreement with Helix Environmental Planning, Inc., for a not-to-exceed amount of \$2.8 million, for environmental review and analysis and preparation of environmental documentation for the Program. For this agreement, Metropolitan has established a Small Business Enterprise participation level of 25 percent. Helix has agreed to meet this level of participation. The planned subconsultants for this work are listed in **Attachment 1**.

Engineering Services for AWT Facilities (Stantec Consulting Services Inc.) – New Agreement

Stantec Consulting Services Inc. (Stantec) is recommended to conduct the engineering and technical studies for the AWT facilities described above. Stantec was selected through a competitive process via Request for Proposals No. 1283 based on the firm's experience in design, construction, and operation of conventional wastewater treatment and advance treatment processes associated with water/wastewater treatment facilities, including permitting and DPR applications.

The planned engineering and technical studies include: (1) comprehensive site investigation and geotechnical analyses; (2) assessment of AWT and DPR technologies; (3) development of design criteria, treatment process and operating criteria, and conceptual plan for a full-scale AWT facility at the Joint Plant; (4) design of a demonstration scale DPR testing facility; (5) development of construction cost estimates and project schedule; and (6) preparation of technical reports documenting all findings and recommendations.

This action authorizes a new agreement with Stantec Consulting Services Inc., for a not-to-exceed amount of \$6.5 million, for engineering and technical studies related to the AWT facilities to support the environmental planning phase of the Program. For this agreement, Metropolitan has established a Small Business Enterprise participation level of 25 percent. Stantec has agreed to meet this level of participation. The planned subconsultants for this work are listed in **Attachment 2**.

Alternatives Considered

Staff considered several alternatives to complete the necessary engineering and technical studies and environmental documentation for the environmental planning phase of the Program. One alternative was to utilize Metropolitan's staff to perform all work components. The Program's upcoming activities will include the need for specialized engineering expertise such as technical knowledge and experience in implementing AWT

technologies and DPR applications. The in-house engineering staff does not routinely work in these areas. The recommended approach uses in-house staff for items normally encountered when working on Capital Investment Plan (CIP) projects, while consultants are utilized for specialized technical studies. This strategy will also be used for the development of the environmental documentation, which requires sophisticated environmental analyses used in the implementation of complex, large-scale projects, consideration of various environmental factors, and preparation of specialized documents.

After assessing the current staff workload and the required expertise, the use of specialized consultants is recommended to perform specific work identified in this board letter. Under this approach, Metropolitan staff will oversee the consultants' work and maintain key engineering and environmental planning competencies, while addressing specialized project needs. This approach will allow for timely completion of engineering and technical studies and environmental documentation for the Program without impacting the planned schedules of key CIP rehabilitation projects in the most cost- and time-efficient manner possible.

Summary

This action authorizes new agreements with: (1) Helix Environmental Planning, Inc., for a not-to-exceed amount of \$2.8 million to prepare the environmental documentation for the environmental planning phase of the Program; and (2) Stantec Consulting Services Inc., for a not-to-exceed amount of \$6.5 million for engineering and technical studies to support the environmental planning phase of the Program. See **Attachment 1** for the Listing of Subconsultants for the Agreement with Helix Environmental Planning, Inc., **Attachment 2** for the Listing of Subconsultants for the Agreement with Stantec Consulting Services Inc.; and **Attachment 3** for the Location Map.

Project Milestones

March 2024 – Board certification of environmental documentation

April 2024 – Completion of demonstration facility modifications for DPR testing

Policy

Metropolitan Water District Administrative Code Section 5108: Appropriations

Metropolitan Water District Administrative Code Section 8121: General Authority of the General Manager to Enter Contracts

Metropolitan Water District Administrative Code Section 11104: Delegation of Responsibilities

Metropolitan Board Report No. 01122016 IRP 8-3 B-L, “2015 Integrated Water Resources Plan Update,” adopted January 2016

By Minute Item 42287, dated February 11, 1997, the Board adopted a set of policy principles on water recycling.

By Minute Item 50299, dated November 10, 2015, the Board authorized an agreement with County Sanitation District No. 2 of Los Angeles County for development of a potential regional recycled water supply program and a demonstration project.

By Minute Item 50410, dated March 8, 2016, the Board authorized agreements for design of the demonstration scale recycled water treatment plant and feasibility studies of recycled water delivery system.

By Minute Item 50884, dated July 11, 2017, the Board authorized construction of the advanced water treatment demonstration plant.

By Minute Item 51963, dated April 14, 2020, the Board appropriated a total of \$500 million for projects identified in the Capital Investment Plan for Fiscal Years 2020/21 and 2021/22.

By Minute Item 52174, dated November 10, 2020, the Board authorized preparation of environmental documentation and technical studies, and public outreach activities for the Regional Recycled Water Program.

By Minute Item 52404, dated June 8, 2021, the Board authorized an agreement with Black & Veatch Corporation, Inc. for engineering and technical studies to support environmental planning phase activities of the Regional Recycled Water Program.

By Minute Item 52476, dated August 17, 2021, the Board authorized an agreement with CDM Smith for engineering and technical studies at the Advanced Water Treatment Demonstration Facility.

California Environmental Quality Act (CEQA)

CEQA determination for Option #1:

The proposed action is exempt from the provisions of CEQA and the State CEQA Guidelines because it consists of minor public or private alterations in the condition of land, water, and/or vegetation, which do not involve removal of healthy, mature, scenic trees (Section 15304 of the State CEQA Guidelines). Additionally, the proposed action is exempt from the provisions of CEQA and the State CEQA Guidelines because it consists of basic data collection, research, experimental management, and resource evaluation activities which do not result in a serious or major disturbance to an environmental resource. These may be strictly for information gathering purposes, or as part of a study leading to an action which a public agency has not yet approved, adopted, or funded (Section 15306 of the State CEQA Guidelines).

CEQA determination for Option #2:

None required

Board Options

Option #1

- a. Authorize an agreement with Helix Environmental Planning, Inc., in an amount not to exceed \$2.8 million for preparation of environmental documentation for the Regional Recycled Water Program; and
- b. Authorize an agreement with Stantec Consulting Services Inc., in an amount not to exceed \$6.5 million for engineering and technical studies to support environmental planning phase activities of the Regional Recycled Water Program.

Fiscal Impact: \$7.5 million in O&M funds and \$1.8 million in capital funds. Approximately \$3 million will be incurred in O&M funds and \$0.5 million in capital funds in the current biennium and have been previously authorized.

Business Analysis: This option would advance the development of significant water reuse in Southern California and would augment regional supplies for Metropolitan's entire service area to deal with droughts, climate change, seismic risks, and uncertainties of imported water supplies.

Option #2

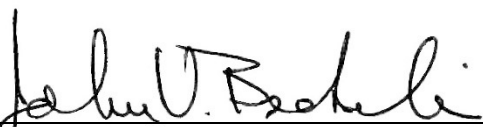
Do not proceed with the new agreements at this time.


Fiscal Impact: None

Business Analysis: This option would delay development of recycled water resources to meet the increasing need for the region's water supply to deal with drought, climate change, seismic risks, and other emergencies.

Staff Recommendation

Option #1



John V. Bednarski
Manager/Chief Engineer
Engineering Services
9/22/2021
Date

Adel Hagekhalil
General Manager
9/29/2021
Date**Attachment 1 – Subconsultants for Agreement with Helix Environmental Planning, Inc.****Attachment 2 – Subconsultants for Agreement with Stantec Consulting Services Inc.****Attachment 3 – Location Map**

Ref# es12677926

The Metropolitan Water District of Southern California
Subconsultants for Agreement with Helix Environmental Planning, Inc.

Subconsultant and Location
Paleo Solutions, Inc., Monrovia, CA
Ninyo & Moore Geotechnical and Environmental Sciences Consultants, San Diego, CA
Rick Engineering Company, San Diego, CA
Iteris, Inc., Los Angeles, CA

The Metropolitan Water District of Southern California
Subconsultants for Agreement with Stantec Consulting Services Inc.

Subconsultant and Location
Aldea Services, Inc., Los Angeles, CA
Carollo Engineers, Inc., Los Angeles, CA
Jacobs Engineering Group Inc., Los Angeles, CA
Kana Subsurface Engineering, Riverside, CA
One Water Solutions, Ann Arbor, MI
MWA Architects, Inc., San Francisco, CA
Paul Hansen Engineering, Rancho Palos Verdes, CA
Paul Redvers Brown, Inc., Encinitas, CA
THE CONVERSE PROFESSIONAL GROUP, dba Converse Consultants, Monrovia, CA
Trussell Technologies, Inc., Pasadena, CA
Veneklasen Associates, Inc., Santa Monica, CA

Location Map





Regional Recycled Water Program

Agreements for Preparation of Program's Env. Documentation and
Advanced Water Treatment Engineering Support

Engineering and Operations Committee

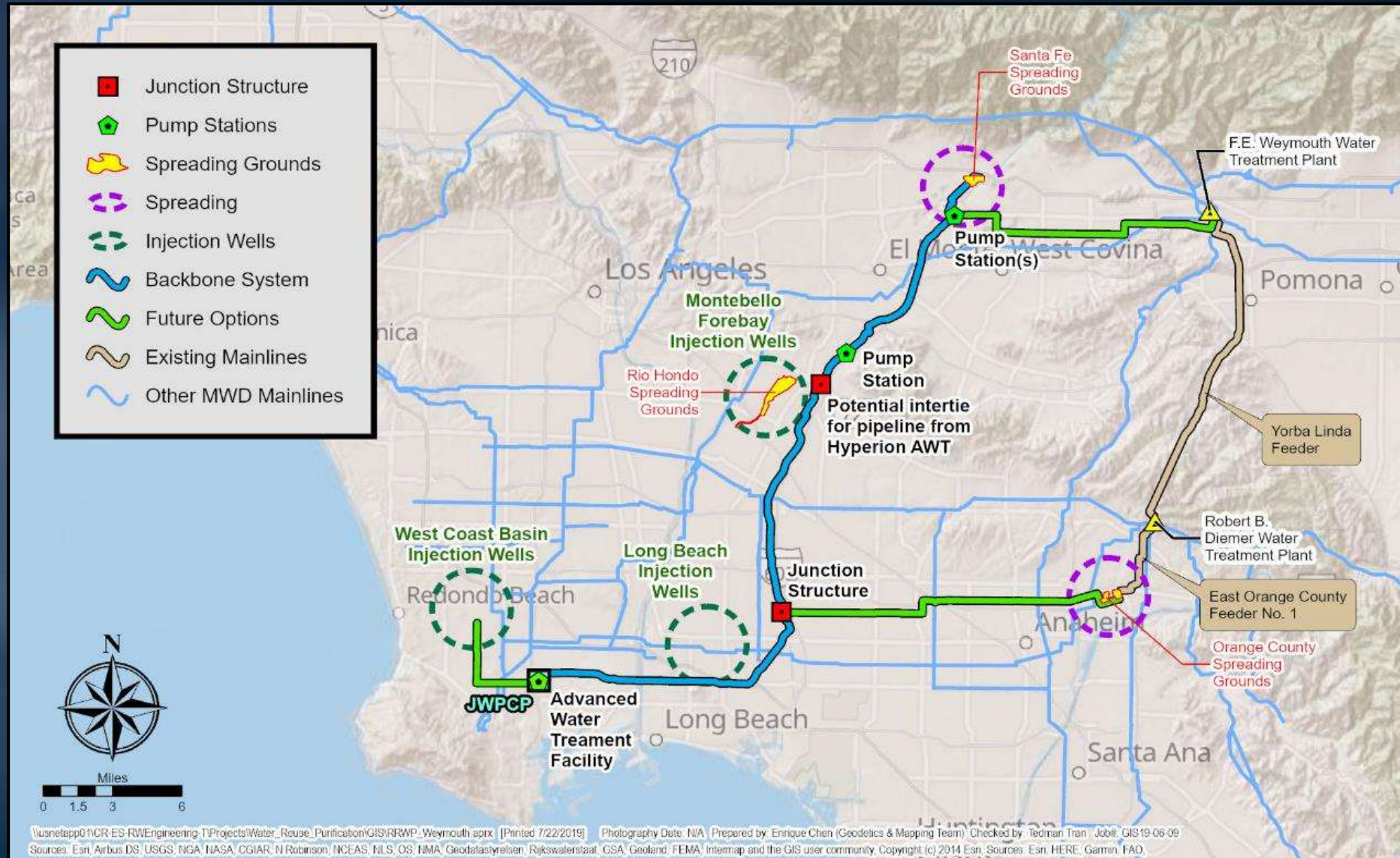
Item 7-3

October 11, 2021

Current Action

- Authorize an agreement with Helix Environmental Planning, Inc., in an amount not to exceed \$2.8 million, to prepare environmental documentation for the Regional Recycled Water Program
- Authorize an agreement with Stantec Consulting Services Inc., in an amount not to exceed \$6.5 million for engineering and technical studies to support the environmental planning phase of the Program

Regional Recycled Water Program



Joint Water Pollution Control Plant



RRWP Env. Planning Phase Activities

● Recent Accomplishments

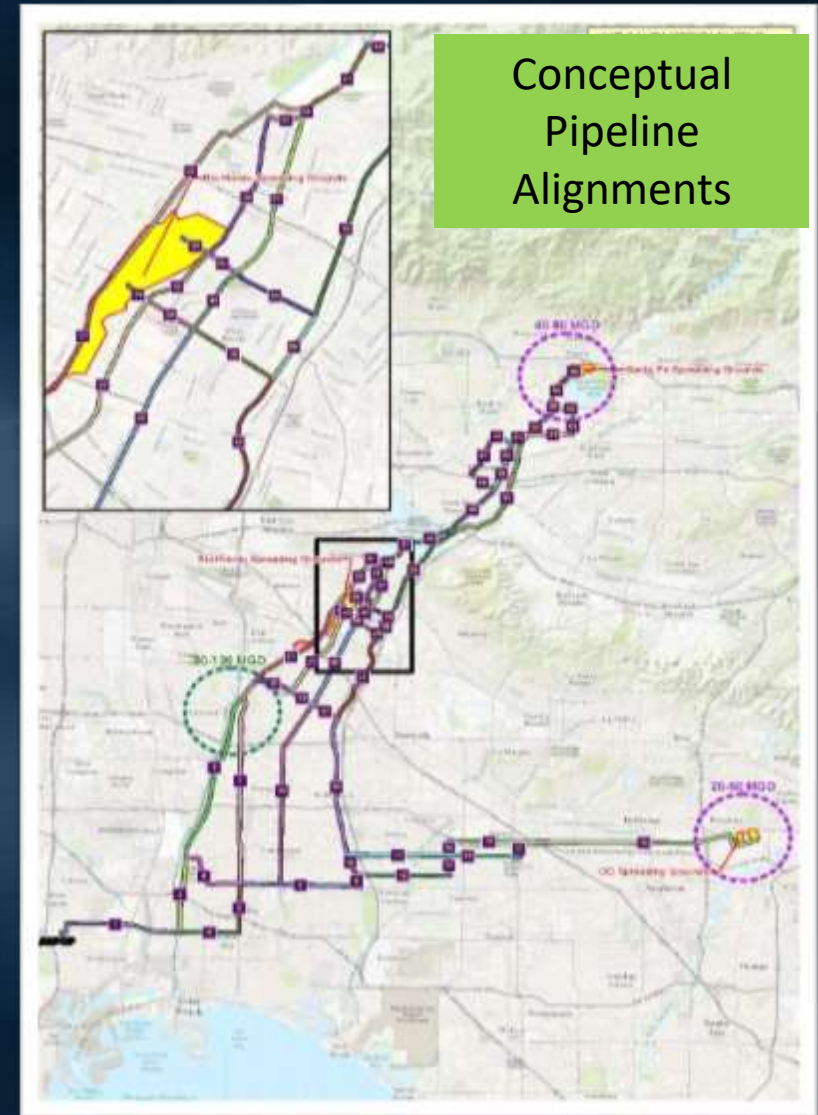
- Board authorized preparation of environmental documentation & technical studies for RRWP
- Amendments & agreements with LACSD and SNWA
- Public outreach consultants selected for on-call services
- Authorized agreement for conveyance engineering support
- Authorized agreement for demonstration testing & operation

● Current Action

- Authorize agreements for environmental documentation and Advanced Water Treatment (AWT) engineering support

Environmental Planning Support

- Preparation of env. documentation
 - Program EIR per CEQA guidelines
 - “CEQA-Plus” for Federal funding
- Coordination with LACSD and AWT & conveyance consultants
- Regulatory permit assessment
- Public outreach support



AWT Engineering Support

- Support environmental planning needs
- Finalize preferred AWT process
- Coordinate with LACSD on biological nitrogen removal process
- Develop full-scale conceptual facilities plan
- Assess DPR approaches and associated program components
- Evaluate power and energy sustainability
- Update program-level AWT costs



Conceptual Configuration
Full-Scale AWT Facility

Alternatives Considered

- All work by Metropolitan staff
- All work by consultant
- Hybrid approach (selected option)
 - Metropolitan staff – perform project management, technical oversight, coordination w/ regulatory agencies
 - Consultant – provide specialized technical expertise

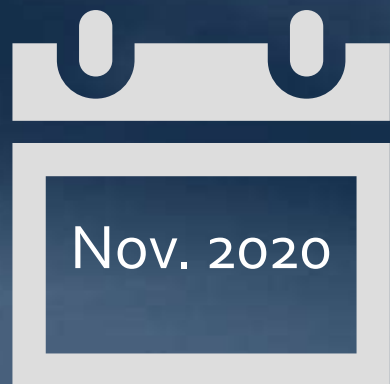
New Agreement – Helix Environmental Planning, Inc.

- Competitively selected under RFP No. 1285
- Scope of Work
 - Prepare Program EIR and “CEQA-Plus” documents
 - Assess potential alternatives and environmental impacts
 - Prepare Mitigation Monitoring and Reporting Plan to minimize environmental impacts
 - Distribute notices and documents per State CEQA Guidelines
 - Manage scoping meetings, support public outreach, and assess regulatory permit needs
- SBE/DVBE participation level – 25%
- NTE amount – \$2.8 million

New Agreement – Stantec Consulting Services Inc.

- Competitively selected under RFP No. 1283
- Scope of Work
 - Support environmental planning and CEQA documentation
 - Finalize preferred AWT process
 - Prepare full-scale AWT Conceptual Facilities Plan
 - Assess potential DPR facility sites and treatment technologies
 - Develop cost estimates and project schedule
 - Prepare DPR demonstration testing facility design, if needed
- SBE/DVBE participation level – 25%
- NTE amount – \$6.5 million

Program Schedule



Board Approval
of Next Steps

COMPLETED



Environmental
Planning

IN PROGRESS



Design and
Construction

FUTURE



Start-up and
Operations

FUTURE

Board Options

- Option #1

- a. Authorize an agreement with Helix Environmental Planning, Inc., in an amount not to exceed \$2.8 million for preparation of environmental documentation for the Regional Recycled Water Program; and
- b. Authorize an agreement with Stantec Consulting Services Inc., in an amount not to exceed \$6.5 million for engineering and technical studies to support environmental planning phase activities of the Regional Recycled Water Program.

- Option #2

- Do not proceed with the new agreements at this time.

Staff Recommendation

- Option #1





- Board of Directors
Engineering and Operations Committee

10/12/2021 Board Meeting

7-4

Subject

Award a \$282,390 contract to AME Builders, Inc. for replacement of the roof on the Vehicle Maintenance and Warehouse Building at the Jensen Water Treatment Plant; the General Manager has determined that the proposed action is exempt or otherwise not subject to CEQA

Executive Summary

The Vehicle Maintenance and Warehouse Building at the Joseph Jensen Water Treatment Plant (Jensen plant) was constructed in 1999. The building roof has deteriorated over time and needs to be replaced. This action awards a construction contract to replace the roof on the Vehicle Maintenance and Warehouse Building at the Jensen plant.

Details

Background

The Jensen plant was placed into service in 1972 with an initial capacity of 400 million gallons per day (mgd) and was expanded to its current capacity of 750 mgd in the 1990s. Located in Granada Hills, the Jensen plant treats water from the West Branch of the State Water Project and delivers it to Metropolitan's Central Pool and to exclusive service areas on the west side of the distribution system.

The Vehicle Maintenance and Warehouse Building was placed into operation in 1999 and serves dual purposes. The warehouse portion stores stock supplies for operations and maintenance work and personal protective equipment for employees. The vehicle maintenance part of the building is utilized to service fleet vehicles. The building roof has reached the end of its service life and has leaked at several locations during the last several winter seasons. Leaks may cause damage to equipment and material stored in the warehouse. Staff has been required to implement temporary measures to protect the contents of both buildings when it rains.

In accordance with the April 2020 action on the biennial budget for Fiscal Years 2020/21 and 2021/22, the General Manager will authorize staff to proceed with replacement of the roof on the Vehicle Maintenance and Warehouse Building, pending board award of the contract described below. Based on the current CIP expenditure forecast, funds for the work to be performed, pursuant to this action during the current biennium, are available within the Capital Investment Plan Appropriation for Fiscal Years 2020/21 and 2021/22 (Appropriation No. 15519). This project has been reviewed in accordance with Metropolitan's CIP prioritization criteria and was approved by Metropolitan's CIP evaluation team to be included in the System Reliability Program.

Vehicle Maintenance and Warehouse Building Roof Replacement – Construction

The scope of the construction contract work consists of the replacement of approximately 14,000 square feet of roofing material on the building, which includes removing the existing asphalt roofing system and installing a new single-ply roofing system. Metropolitan forces will conduct temporary relocations of the heating, ventilation and air-conditioning conduits and piping on the roof, replace damaged insulation and ceiling tile, and repaint water-damaged walls inside the building.

A total of \$460,000 has been budgeted for this work. In addition to the amount of the contract described below, other funds to be allocated include \$40,000 for construction inspection; \$32,000 for Metropolitan force activities

as described above; \$25,000 for submittals review, technical support during construction, responding to requests for information, and preparation of record drawings; \$50,000 for contract administration and project management; and \$30,610 for the remaining budget.

Attachment 1 provides the allocation of the required funds. The total estimated cost of the Vehicle Maintenance and Warehouse Building Roof Replacement, including the amount allocated to date and funds allocated for the work described in this action, is approximately \$585,000. Approximately \$125,000 has been expended on this project to date.

Award of Construction Contract (AME Builders, Inc.)

Specification No. M-3050 to replace the Vehicle Maintenance and Warehouse Building roof at the Jensen plant was advertised for bids on July 27, 2021. As shown in **Attachment 2**, nine bids were received and opened on August 26, 2021. The low bid from AME Builders, Inc. in the amount of \$282,390 complies with the requirements of the specifications. The other bids ranged from \$294,700 to \$397,810, while the engineer's estimate for this project was \$375,000. For this contract, Metropolitan established a Small Business Enterprise (SBE) participation level of at least 25 percent of the bid amount. AME Builders, Inc. is an SBE firm and thus achieves 100 percent SBE participation.

This action awards a \$282,390 contract to AME Builders, Inc. for the roof replacement of the Vehicle Maintenance and Warehouse Building. As described above, Metropolitan staff will perform construction management and inspection. Engineering Services' performance metric target range for inspection of projects with construction less than \$3 million is 15 percent. For this project, the performance metric goal for inspection is 12.7 percent of the total construction cost, which includes the construction contract (\$282,390) and Metropolitan force construction (\$32,000).

Alternative Considered

Early in the design process, staff considered continuing to repair portions of the roof where leakage was observed. However, past repairs have not prevented the development of new leaks in subsequent rainy seasons. The recurrence of leaks is an indication that the 20-year old roof is nearing the end of its service life. The selected alternative replaces the entire roof in order to maintain long-term operational reliability and provide the best value to Metropolitan.

Summary

This action awards a \$282,390 contract to AME Builders, Inc. for the replacement of the Vehicle Maintenance and Warehouse Building roof at the Jensen plant. See **Attachment 1** for the Allocation of Funds, **Attachment 2** for the Abstract of Bids, and **Attachment 3** for the Location Map.

Project Milestone

April 2022 – Completion of construction

Policy

Metropolitan Water District Administrative Code Section 8121: General Authority of the General Manager to Enter Contracts

Metropolitan Water District Administrative Code Section 8140: Competitive Procurement

Metropolitan Water District Administrative Code Section 11104: Delegation of Responsibilities

By Minute Item 51963, dated April 13, 2020, the Board appropriated a total of \$500 million for projects identified in the Capital Investment Plan for Fiscal Years 2020/21 and 2021/22.

California Environmental Quality Act (CEQA)

CEQA determination for Option #1:

The proposed action involves operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use and no possibility of significantly impacting the physical environment. In addition, the proposed action includes the replacement and reconstruction of existing structures and facilities where the new structure will be located on the same site and as the structure replaced and will have the same purpose and capacity as the structure replaced. Accordingly, the proposed action qualifies under Class 1 and Class 2 Categorical Exemptions (Sections 15301 and 15302 of the State CEQA Guidelines).

CEQA determination for Option #2:

None required

Board Options

Option #1

Award a \$282,390 contract to AME Builders, Inc. for replacement of the roof on the Vehicle Maintenance and Warehouse Building at the Jensen plant.

Fiscal Impact: Expenditure of \$460,000 in capital funds. All expenditures will be incurred in the current biennium and have been previously authorized.

Business Analysis: This option will protect Metropolitan's assets and reduce the risk of repairs on the building.

Option #2



Do not proceed with the project at this time.

Fiscal Impact: Unknown

Business Analysis: Under this option, staff would continue to repair the existing roof as needed, which may lead to higher repair costs and interior damage within the building.

Staff Recommendation

Option #1

 _____ John V. Bednarski Chief Engineer Engineering Services	9/22/2021 _____ Date
 _____ Adel Hagekhalil General Manager	9/29/2021 _____ Date

Attachment 1 – Allocation of Funds

Attachment 2 – Abstract of Bids

Attachment 3 – Location Map

Ref# es12681028

Allocation of Funds for Vehicle Maintenance and Warehouse Building Roof Replacement at Jensen plant

	Current Board Action (Oct. 2021)
Labor	
Studies & Investigations	\$ -
Final Design	-
Owner Costs (Program mgmt., envir. monitoring)	50,000
Submittals Review & Record Drwgs.	25,000
Construction Inspection & Support	40,000
Metropolitan Force Construction	32,000
Materials & Supplies	-
Incidental Expenses	-
Professional/Technical Services	-
Right-of-Way	-
Equipment Use	-
Contracts	-
AME Builders, Inc.	282,390
Remaining Budget	30,610
Total	\$ 460,000

The total amount expended to date for the roof replacement of Vehicle Maintenance and Warehouse Building at Jensen plant is approximately \$125,000. The total estimated cost to complete the roof replacement of Vehicle Maintenance and Warehouse Building, including the amount appropriated to date, and funds allocated for the work described in this action, is \$585,000.

The Metropolitan Water District of Southern California

Abstract of Bids Received on August 26, 2021, at 2:00 P.M.

Specifications No. 3050

Jensen Water Treatment Plant

Vehicle Maintenance and Warehouse Building Roof Replacement

The work consists of the replacement of approximately 14,000 square feet of roofing material on the building, which includes removing the existing asphalt roofing system, and installing a new single-ply roofing system.

Engineer's estimate: \$~~374~~375,000

Bidder and Location	Total	SBE \$	SBE %	Met SBE¹
AME Builders, Inc. Pomona, CA	\$282,390.00	\$282,390.00	100%	Yes
Letner Roofing Company Orange, CA	\$294,700.00	-	-	-
Pacific Builders & Roofing Banning, CA	\$315,000.00	-	-	-
Eberhard Van Nuys, CA	\$318,966.00	-	-	-
Rite-Way Roof Corporation Fontana, CA	\$333,282.00	-	-	-
Best Contracting Services, Inc. Gardena, CA	\$354,486.00	-	-	-
Commercial Waterproofing Systems, Inc. Santa Ana, CA	\$371,765.41	-	-	-
Pacific Single Ply Roofing La Habra, CA	\$385,893.00	-	-	-
Bligh Roof Company Santa Fe Springs, CA	\$397,810.00	-	-	-

¹ Small Business Enterprise (SBE) participation level was established at 25% for this contract.





Award Construction Contract for Roof Replacement on the Vehicle Maintenance and Warehouse Building at the Jensen Plant

Engineering and Operations Committee

Item 7-4

October 11, 2021

Current Action

- Award a \$282,390 contract to AME Builders, Inc. to replace the roof on the Vehicle Maintenance and Warehouse Building at the Jensen plant

Distribution System



Location Map



Vehicle Maintenance & Warehouse Building

- Constructed in 1999
- Dual purpose building
 - Storage of stock supplies for operations
 - Fleet vehicle maintenance
- Roof condition
 - Asphalt roofing system at end of service life
 - Frequent leakage during winter seasons



Temporary Rainwater Collection System

Alternatives Considered

- Repair portions of the roof where leakage is observed
 - 20-year-old roof is nearing the end of its service life
 - Past repairs have not prevented new leaks during rain events
- Selected alternative
 - Replace the entire roof to maintain long-term operational reliability

Scope of Work

- Contractor
 - Remove & replace existing 14,000 sq ft roofing system
- Metropolitan
 - Temporarily relocate HVAC conduits & piping on the roof
 - Replace damaged insulation & ceiling tile
 - Repaint water-damaged walls inside the building
 - Construction inspection & submittal review
 - Project mgmt. & contract admin.

Bid Results

Specifications No. 3050

Bids Received	August 26, 2021
No. of Bidders	9
Low Bidder	AME Builders, Inc.
Low Bid	\$282,390
Range of Higher Bids	\$294,700 to \$397,810
Engineer's estimate	\$375,000
SBE Participation*	100%

*SBE (Small Business Enterprise) participation level set at 25%

Allocation of Budgeted Funds

Contract

AME Builders, Inc.	\$282,390
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Metropolitan Labor

Construction inspection	40,000
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Force construction	32,000
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Submittals review & record drwgs.	25,000
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Program mgmt. & contract administration	50,000
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Remaining Budget	30,610
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Total:	\$460,000
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Project Schedule

Activity	2021	2022
Jensen Vehicle Maintenance & Warehouse Building Roof Replacement		



Board Action



Construction



Completion

Board Options

- Option #1
 - Award a \$282,390 contract to AME Builders, Inc. for replacement of the roof on the Vehicle Maintenance and Warehouse Building at the Jensen plant.
- Option #2
 - Do not proceed with the project at this time.

Staff Recommendation

- Option #1





- **Board of Directors**
Engineering and Operations Committee

10/12/2021 Board Meeting

7-5

Subject

Authorize the General Manager to enter into an agreement with the Arizona Department of Water Resources and the Central Arizona Water Conservation District to support the development of the Regional Recycled Water Program; the General Manager has determined that the proposed action is exempt or otherwise not subject to CEQA

Executive Summary

Staff recommends executing an agreement with the Arizona Department of Water Resources (ADWR) and the Central Arizona Water Conservation District (CAWCD) to accept up to \$6 million in financial support for the development of the Regional Recycled Water Program. These agencies (ADWR and the CAWCD) are collectively called the “Arizona Parties” for this document.

Details

Background

In December 2020, Metropolitan entered into an agreement with the Southern Nevada Water Authority (SNWA) to fund up to \$6 million of the environmental phase work for the Regional Recycled Water Program. The Arizona Parties have expressed interest in developing a similar agreement.

The Arizona Parties, SNWA, and Metropolitan have a long history of working collaboratively to improve water supply reliability from the Colorado River. Over the last two decades, as Lake Mead levels declined and flows on the Lower Colorado River have been impacted, the Arizona Parties, SNWA, and Metropolitan have worked together to develop programs that benefitted all parties and the Colorado River as a whole. For example, Metropolitan, SNWA, and CAWCD funded a new regulating reservoir near the All-American Canal, funded conservation programs for the benefit of the Colorado River system, and developed conservation projects in Mexico. Additionally, ADWR and SNWA entered into an Intentionally Created Surplus (ICS) capacity sharing agreement with Metropolitan to more effectively use the available ICS storage capacity provided in the Lower Basin Drought Contingency Plan.

The Arizona Parties expressed interest in furthering their partnership with Metropolitan by developing an agreement similar to the SNWA funding agreement. In August of 2020, the Arizona Parties provided a non-binding letter of interest (LOI) to explore a potential partnership to jointly fund the Regional Recycled Water Program (Program) and receive water supply benefits from it. However, the LOI did not contain any firm commitments, nor did it specify any details. Accordingly, during the upcoming negotiations to develop new guidelines for the Colorado River, the agencies would like to facilitate interstate participation in the Program. To help advance this partnership, the Arizona Parties want to fund a portion of the Program’s environmental costs.

Framework for Potential Exchanges in Support of the Program

Similar to the agreement with SNWA, staff sees an opportunity for potential exchanges with agencies that wish to partner in the Program. Board members have noted that while the Program provides significant regional benefits, it also comes at a higher unit cost (\$ per acre-foot) than Metropolitan’s previous investments. These exchange partnerships could significantly reduce Metropolitan’s net cost exposure while enhancing dry-year reliability and resilience to catastrophic events.

A set of general guidelines can be helpful for considering potential future Program exchanges. These general guidelines form the basis for any Program exchange proposals that would be brought for board discussion or consideration. While the guidelines can help bound the discussions on potential Program exchanges, substantive development of agreements and board discussions on specific exchanges are premature at this time. Significant analysis will be done through the environmental planning phase of the Program to help inform these discussions over the next couple of years.

Enhanced Reliability

Recent history, previous modeling analysis, and work currently underway through the Integrated Resources Plan (IRP) Update indicates that Metropolitan does not face water reliability issues in normal or wet year conditions. In fact, Metropolitan is likely to have surplus water available for storage in these year-types. As a result, any supply reliability issues appear to be confined to significant multiple dry-year sequences and catastrophic event scenarios. This circumstance has been shown through analysis done in the 2010 and 2015 IRP Updates and is likely to be emphasized again in the 2020/21 IRP Update. As such, Metropolitan will only consider Program exchanges that enhance dry-year reliability or resilience under catastrophic events after the Program is complete. Exchanges that negatively impact these factors will not be considered.

This guideline would likely focus on arrangements that allow Program water to be exchanged in normal or wet years while maintaining full access to imported supplies in dry conditions or catastrophic events, in addition to the water produced by the Program. This approach ensures net reliability improvements for the region.

Regional Provider

Metropolitan is developing the Program for the benefit of all member agencies. Funding provided by outside participants can reduce the net cost burden on Metropolitan's member agencies. As such, staff will focus on potential Program exchanges with agencies outside of Metropolitan's service area.

Metropolitan would consider Program exchange concepts with agencies on both the Colorado River or State Water Project (SWP) systems. Any potential Program exchanges on the SWP system would have a further requirement of preserving or enhancing the reliability of the SWP-constrained regions in Metropolitan's system. Program exchanges that reduce the availability of SWP supplies to these constrained areas in times of need would not be considered.

Full Cost Recovery

Any potential exchanges should achieve full cost recovery on a per acre-foot basis. Metropolitan does not intend to consider partnerships that seek exchanges at a subsidized rate.

Proposed Agreement with Arizona Parties

As discussed above, it is not time to consider a specific Program exchange agreement. However, the Arizona Parties are interested in assisting Metropolitan with completing the due diligence necessary to understand the Program parameters and costs. This information would inform decisions by the parties about a potential future Program exchange. The Arizona Parties propose to financially support the environmental planning phase activities for the Regional Recycled Water Program through a funding agreement. CAWCD's board of directors approved its participation on June 10, 2021.

A term sheet for the proposed Regional Recycled Water Program agreement with the Arizona Parties is provided in **Attachment 1**. The Arizona Parties would provide direct cost contribution in the lesser amount of either \$6 million or 24 percent of Metropolitan's costs. The combined funding from both SNWA and the Arizona Parties would be up to \$12 million or 48 percent of Metropolitan's costs for the environmental phase. Metropolitan would be responsible for 52 percent of the costs associated with the environmental phase. Under the proposed agreement with the Arizona Parties, Metropolitan would bill CAWCD for the Arizona Parties' contributions. Pursuant to a separate agreement between CAWCD and ADWR, CAWCD would contribute up to \$5 million while ADWR would provide up to \$1 million; however, in the event ADWR is unable to provide funding, CAWCD would provide up to \$6 million. The contribution from the Arizona Parties would reimburse Metropolitan to directly offset the environmental planning phase costs by the same amount.

In addition to the benefits described in the guidelines above, partnering with the Arizona Parties also presents an important opportunity for coordination on the Colorado River. The Arizona Parties and Metropolitan would have a mutual interest in seeking a framework on the Colorado River that recognizes this opportunity for supply augmentation. This feeds into discussions of the Operating Guidelines for the Lower Basin of the Colorado River, which are set to expire at the end of 2026. Cementing a partnership for coordination on the environmental planning phase activities of the Program at this time will also reinforce the commitment to work together in these important upcoming negotiations on the Colorado River. Importantly, this agreement would also help show collaboration among the three states in the Lower Basin of the Colorado River, which could help with future federal funding opportunities for the RRWP

The proposed agreement does not obligate Metropolitan or the Arizona Parties to an exchange in the future. Metropolitan will carefully consider all factors before surrendering any portion of its Colorado River supply. Climate change and deepening drought may mean Southern California will need all its available water resources in the future to meet our long-term demands. Staff recommends proceeding with this partnership without any obligations related to a long-term exchange. Under the proposed agreement, either the Arizona Parties or Metropolitan can decide not to proceed in the future. In this circumstance, Metropolitan would return the Arizona Parties' contribution with no interest charged. As information is developed through the environmental planning phase of the Program, staff would return to the Board with a full analysis of the benefits and risks of any Program exchange.

Additional Interest

In addition to the Arizona Parties and SNWA, some other agencies have indicated an interest in discussing similar arrangements. These discussions are preliminary and would be informed by feedback the Board may provide on this action item. Agencies that have expressed interest so far include Coachella Valley Water District (Colorado River and State Water Contractor), Desert Water Agency (State Water Contractor), and San Gabriel Valley Municipal Water District (State Water Contractor).

Summary

This action authorizes a funding agreement with the Arizona Parties that provides no risk to the parties. This agreement only deals with funding for the environmental planning phase of the Program and does not commit Metropolitan to complete the Program, nor does it commit any of the agencies to a future Program exchange. If Metropolitan, ADWR or CAWCD chooses not to proceed, Metropolitan will return the funds the Arizona Parties provided to Metropolitan without any interest. The CAWCD board has voted to authorize proceeding with the agreement.

Policy

Metropolitan Water District Administrative Code Section 8121: General Authority of the General Manager to enter Contracts

Metropolitan Water District Administrative Code Section 11104: Delegation of Responsibilities

California Environmental Quality Act (CEQA)

CEQA determination for Option #1:

The proposed action is not defined as a project under CEQA (Public Resources Code Section 21065, State CEQA Guidelines Section 15378) because the proposed action will not cause either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment and involves continuing administrative or maintenance activities (Section 15378(b)(2) of the State CEQA Guidelines). The proposed action also is not defined as a project under CEQA because it involves other government fiscal activities which do not involve any commitment to any specific project, which may result in a potentially significant physical impact on the environment (Section 15378(b)(4) of the State CEQA Guidelines). Additionally, the proposed action is exempt from the provisions of CEQA and the State CEQA Guidelines because it consists of basic data collection, research, experimental management, and resource evaluation activities which do not result in a serious or major disturbance to an environmental resource. These may be strictly for information gathering purposes, or as part of a study leading to an action which a public agency has not yet approved, adopted, or funded (Section 15306 of the

State CEQA Guidelines). Finally, where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the proposed activity is not subject to CEQA (Section 15061(b)(3) of the State CEQA Guidelines).

CEQA determination for Option #2:

None required

Board Options

Option #1

Authorize an agreement with the Arizona Parties to support the development of the Regional Recycled Water Program.

Fiscal Impact: Up to \$6 million will be reimbursed to Metropolitan by the Arizona Parties for expenditures on planning phase activities to develop the Regional Recycled Water Program.

Business Analysis: This option would provide substantial financial support to advance the development of significant water reuse in Southern California and would augment regional supplies for Metropolitan's entire service area to deal with droughts, climate change, and seismic risks.

Option #2

Do not authorize an agreement with the Arizona Parties to support the development of the Regional Recycled Water Program.

Fiscal Impact: Up to \$6 million of Metropolitan funding would be required without reimbursement from the Arizona Parties.

Business Analysis: Under this option, Metropolitan would receive no financial contribution from the Arizona Parties to advance the Regional Recycled Water Program.


Staff Recommendation

Option #1



Brad Coffey
Water Resource Management Manager

10/6/2021
Date



Adel Hagekhalil
General Manager

10/6/2021
Date

Attachment 1: Term Sheet for Potential Regional Recycled Water Program Agreement with Arizona Parties

Ref# wrm12679337

**TERM SHEET FOR POTENTIAL REGIONAL RECYCLED WATER PROGRAM
AGREEMENT WITH ARIZONA PARTIES**

TERMS

1. The Central Arizona Water Conservation District and Arizona Department of Water Resources (collectively referred to as Arizona Parties) will provide to Metropolitan the lesser of either \$6 million or 24 percent of Metropolitan's costs for conducting analyses, investigations, evaluations, studies, and public outreach, as needed, to complete any environmental review and documentation required for design and construction of the Program (collectively "Environmental Planning Phase Services"). These Environmental Planning Phase Services include environmental evaluation, engineering and other technical support, and public outreach, and will conform to and comply with the requirements of the California Environmental Quality Act and any other applicable environmental requirements, permitting processes and laws.
2. Metropolitan shall provide an accounting and invoice Arizona Parties on a quarterly basis for 24 percent of the costs incurred by Metropolitan for Environmental Planning Phase Services, up to a maximum cumulative amount of \$6 million. Arizona Parties shall have the right to review and confirm that the invoice conforms to the terms of this Agreement, and if so approved, Arizona Parties shall pay the invoice within 30 days of receipt.
3. This Agreement does not: obligate Metropolitan to approve or develop the Program; obligate Metropolitan to make water available to Arizona Parties through exchange or other mechanism; obligate Arizona Parties to agree to such exchange; allocate any Program water to Arizona Parties; or set any precedent for the terms of any such allocation. Such terms may be provided for in a separate Development Agreement between the Parties.
4. If Metropolitan does not approve or develop the Program or if Metropolitan or Arizona Parties determines to not enter into a separate Development Agreement to allocate Program water to Arizona Parties, then Metropolitan will return the funds that Arizona Parties provided to Metropolitan under this Agreement, without any interest.
5. If the Parties enter into a separate Development Agreement which allocates Program water to Arizona Parties, the Development Agreement will credit Arizona Parties with the funds provided by Arizona Parties under this Agreement.
6. Metropolitan and Arizona Parties will also explore whether certain in-kind services could be provided by Arizona Parties in support of the Environmental Planning Phase Services.
7. This Agreement is effective as of the date the last Party executes the Agreement and will terminate on December 31, 2035, provided that the Parties may agree to extend the term of this Agreement.
8. This Agreement is not intended by the Parties to create any right in or benefit to Parties other than Arizona Parties and Metropolitan. This Agreement does not create any third-party beneficiary rights or causes of action.
9. The failure of either Party to enforce at any time, or for any period of time, the provisions hereof shall not be construed as a waiver of such provisions or of the rights of such Party to enforce each and every such provision.



Authorize RRWP Funding Agreement with Arizona Parties

Engineering and Operations Committee

Item 7-5

October 11, 2021

Arizona Parties Agreement Solidifies Support for the RRWP

- Letters of Intent with basin parties and key stakeholders first step in developing partnerships
- Funding partners share in cost of environmental phase
 - Sanitation Districts of Los Angeles County
 - SNWA
 - Proposed Arizona Parties Agreement

Who are the Arizona Parties?

- Central Arizona Water Conservation District
 - Also referred to as Central Arizona Project or CAP
- Arizona Department of Water Resources
- Both parties represent Arizona in Colorado River discussions

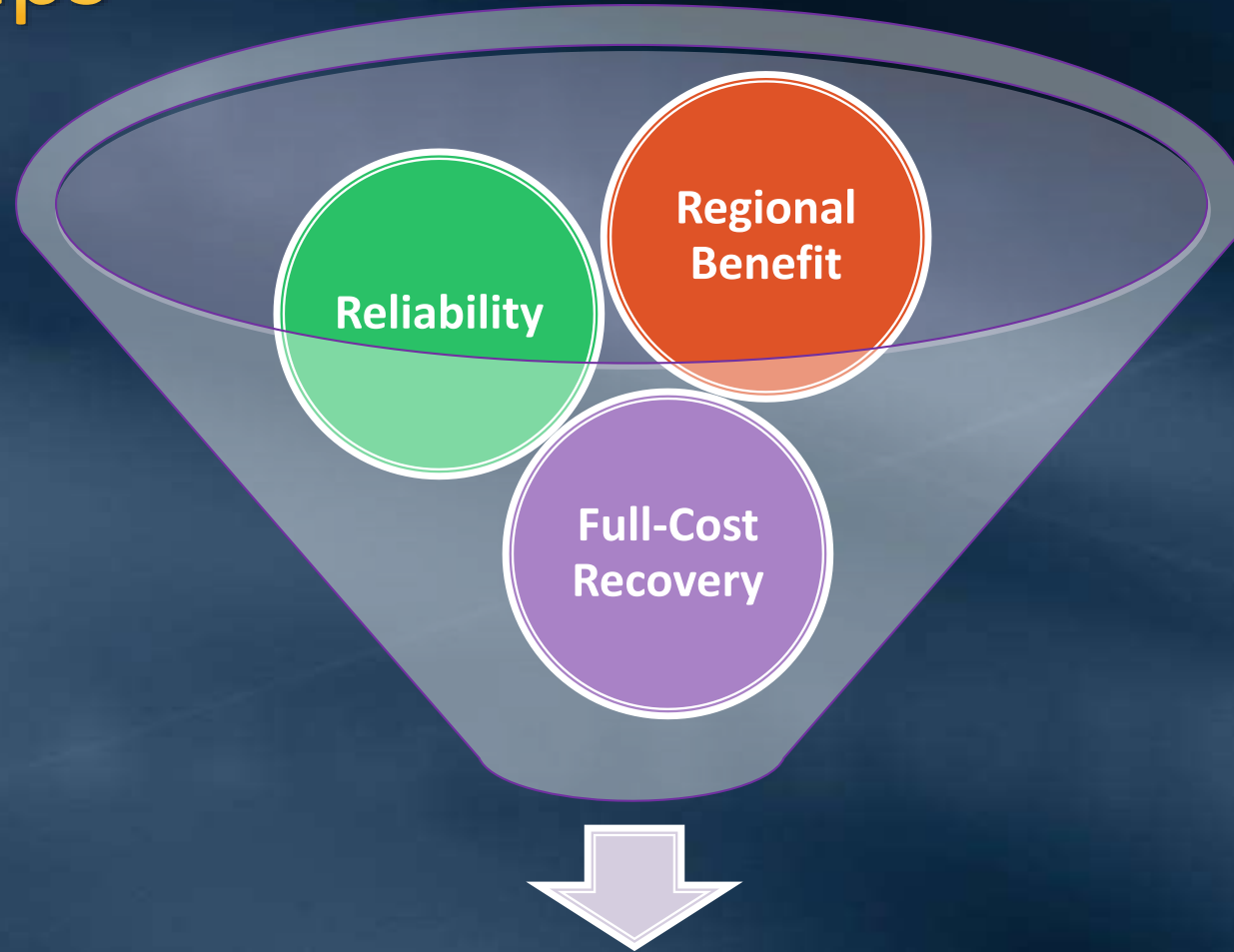
Metropolitan and Arizona Parties Enjoy Long History of Cooperation

- Metropolitan and Central Arizona Water Conservation District
 - Funded new regulating reservoir near the All-American Canal
 - Funded Conservation programs for the benefit of the Colorado River system, and
 - Developed conservation projects in Mexico
- Metropolitan and Arizona DWR
 - Intentionally Created Surplus (ICS) capacity sharing agreement to more effectively use the available ICS storage capacity provided in the Lower Basin Drought Contingency Plan.

Arizona Parties Expressed Interest in Participating in RRWP Planning

- Interested in exploring collaborative water resource projects with Colorado River partners
- Submitted Letter of Interest to explore potential partnership opportunities to support the RRWP in August 2020

Broad Framework Used to Explore Long-Term Partnerships



Partnership Considered

How a Potential Partnership Would Work



Other Agencies May Also Be Interested

- Some State Water contractors have contacted us
 - Interest likely to be for small amounts
 - Only preliminary discussions thus far

Metropolitan/Arizona Parties Agreement – Key Terms

- Arizona Parties to contribute 24 Percent (\$6 M cap) of Metropolitan environmental planning costs
 - Opportunity for in-kind services
- No obligation to participate in future phases
- Funds returned to Arizona Parties if either
 - Metropolitan does not develop RRWP or
 - Either party does not enter into separate participation agreement

Cooperation on Environmental Planning Provides Benefits to All Agencies

- Potentially reduces Metropolitan's expenditures for environmental planning activities
- Improves project understanding and shortens development path for potential long-term partnership
- Aligns agency interests entering Colorado River negotiations for the 2026 Colorado River shortage guidelines
- Help develop Lower Basin State support for Regional Recycled Water Program

Board Options – CAP/AZ DWR/Metropolitan Funding Agreement

- Option #1

- Authorize an agreement with the Arizona Parties to support the development of the Regional Recycled Water Program.

- Option #2

- Do not authorize an agreement with the Arizona Parties to support the development of the Regional Recycled Water Program.

Staff Recommendation

- Option #1





- Board of Directors
Communications and Legislation Committee

10/12/2021 Board Meeting

7-6

Subject

Authorize the General Manager to seek legislation for Metropolitan to utilize alternative project delivery methods for construction of the Regional Recycled Water Program and drought-related projects; the General Manager has determined that the proposed action is exempt or otherwise not subject to CEQA

Executive Summary

Authorization is requested to propose legislation that would permit Metropolitan to utilize alternative project delivery methods for the design and construction of the Regional Recycled Water Program (RRWP) and drought-related projects. Methods such as Design-Build, Progressive Design-Build, and Construction Manager/General Contractor have the potential to expedite online dates for critical new water infrastructure projects and to reduce their costs and risks.

Details

Under Section 21565 of the Public Contract Code, Metropolitan is currently limited to the traditional design-bid-build (DBB) model for the delivery of public works construction projects. Under this method, a public agency designs (or contracts for the design of) a project, solicits competitive bids, and awards a construction contract to the lowest responsible bidder. This traditional process is appropriate for most public works projects, but it may be inefficient and inflexible for large, time-sensitive, and complex projects such as the RRWP and certain drought-related projects. For these projects, Metropolitan would benefit from a broader range of options, including Design-Build (DB), Progressive Design-Build (PDB), and Construction Manager/General Contractor (CM/GC).

Under the DB project delivery method, the DB contractor designs, engineers, and constructs the project under a single contract, according to design parameters, performance criteria, and other requirements established by the owner. The DB procurement method typically utilizes a two-step solicitation process, with entities short-listed in the Request for Qualifications stage. Shortlisted DB contractors then respond to a Request for Proposals, which is based on the owner's preliminary design documents (approximately 30 percent complete). Ultimately, the DB contractor is selected based on qualifications, capabilities, experience, technical proposal, and price, rather than price alone in the DBB model. Once a contractor is selected, DB proceeds in much the same way as a DBB implementation method, with the owner administering the DB contract and performing construction inspection. The cost of both design and construction is set at the onset when the DB contract is awarded, giving the owner price certainty, although owner-requested changes can result in delays and additional costs. Absent termination of the contract for cause or convenience, DB has no contractual off-ramp.

PDB is a project delivery method similar to DB in that the PDB contractor performs design, construction engineering and management, and construction according to design parameters, performance criteria, and other requirements established by the owner. Unlike DB, however, PDB offers the owner the opportunity to add the design-builder to the overall project team even earlier in the design phase than traditional DB. This approach affords the owner and the contractor more opportunities to collaborate during the project's design phase. Such collaboration can typically reduce overall project risks, costs, and schedules. Since the PDB contractor selection is generally based on qualifications and fees, the selection of the PDB contractor can typically be undertaken with an owner's design that is only five to ten percent complete. As part of the price proposal, PDB teams will only provide their design and preconstruction fees, with a fixed price for construction agreed upon at a later time, once the design work is substantially advanced. PDB thus provides the owner a better understanding of the project's

scope before negotiating a final price—typically referred to as a “Guaranteed Maximum Price” or GMP—as well as the ability to competitively bid the project’s construction phase if a GMP cannot be agreed upon. PDB also provides more opportunity than DB for risk-sharing and incentives as well as the ability to minimize conflicts and claims.

CM/GC is a project delivery method that allows an agency to select a contractor early in the project development process to act in an advisory role during the design phase. Under the CM/GC method, the owner is responsible for the design of the project, utilizing their own staff or by contracting with a consultant. The CM/GC contractor provides constructability reviews, value engineering suggestions, construction estimates, and other construction-related recommendations as the owner’s design is progressed. Like the PDB approach, the CM/GC contractor is typically selected at a very early stage in the design process. This ensures that the contractor is collaboratively involved in the ensuing design effort as described above. At an agreed upon point in the design, the CM/GC contractor will propose a price to construct the project. If the price is accepted by the agency, the CM/GC contractor will become the general contractor and will construct the project. If the price is not accepted, the agency will publicly advertise the construction contract. In similar fashion to PDB, the CM/GC delivery methodology is structured to facilitate the ability of the designer/owner and the construction contractor to collaboratively develop the most cost-effective project.

Proposed Legislation

Staff proposes legislation to amend the Public Contract Code to permit Metropolitan to utilize alternative project delivery methods such as DB, PDB, and CM/GC for the RRWP and drought-related projects in addition to traditional DBB.

While design-build has been a common project delivery method in private sector construction for several decades, it is still relatively new in the public sector. The legislature first approved design-build authority for public agencies in 2001 with the passage of AB958 (Chavez, 2001), which authorized “transit operators” to award contracts for transit projects of at least \$10 million on a design-build basis. A variety of other statutes followed authorizing other types of public agencies to utilize design-build, including AB 1329 (Wolk, 2005) which authorized cities to utilize design-build. SB 626 (Dodd, 2021) gave the Department of Water Resources the ability to use DB and CM/GC project delivery methods for repairs and improvements to facilities of the State Water Project, excluding Delta Conveyance.

Incorporating alternative delivery methods into Metropolitan’s traditional DBB implementation could provide the following benefits:

- Enhanced collaboration between owner and contractor through the design and construction process.
- Enhanced project risk identification and allocation between owner and contractor.
- Greater flexibility in the contract award process, not limited to lowest responsible bidder.
- Potentially shorter project completion schedules, leading to earlier online dates.
- Earlier cost certainty with the potential for lower overall project costs.
- Increased opportunities for innovation.

For drought-related projects, the design and construction of new pump stations to increase delivery capabilities of Diamond Valley Lake supplies and/or Central Pool supplies to State Project Water-dependent portions of Metropolitan’s system may benefit from alternative delivery methods. In the RRWP, the design and construction of tunnel portions of the conveyance system, as well as portions of the Advanced Water Treatment facilities, may also benefit from the use of one or more of these alternative delivery approaches. As planning for both drought-related and RRWP projects continue to develop, additional candidate projects for alternative delivery implementation will be identified and analyzed by staff.

Policy

Metropolitan Water District Administrative Code Section 2800. Development, Approval and Support of Legislative Concepts.

Metropolitan Water District Administrative Code Section 11104: Delegation of Responsibilities.

By Minute Item 52205, dated December 8, 2020, the Board adopted the Legislative Priorities and Principles for 2021, Section A.1-2, establishing as top legislative priorities support for measures to defray costs of infrastructure projects and to expedite such projects, including recycled water projects and the RRWP.

California Environmental Quality Act (CEQA)

CEQA determination for Option #1:

The proposed action is not defined as a project under CEQA because it involves legislative proposals that do not involve any commitment to any specific project, which may result in a potentially significant physical impact on the environment (Public Resources Code Section 21065 and Section 15378(b)(1) of the State CEQA Guidelines). In addition, where it can be seen with certainty that there is no possibility that the proposed action in question may have a significant effect on the environment, the proposed action is not subject to CEQA (Section 15061(b)(3) of the State CEQA Guidelines).

CEQA determination for Option #2:

None required

Board Options

Option #1

Authorize the General Manager to seek legislation for Metropolitan to utilize alternative project delivery methods for construction of the Regional Recycled Water Program and drought-related projects in addition to traditional Design-Bid-Build.

Fiscal Impact: The costs associated with sponsoring this bill in the state legislature will be absorbed within existing staffing and program budgets. If the proposed legislation is enacted into law, a full assessment of costs and benefits to implement and conduct the activities will be determined and provided to the Office of the Chief Financial Officer and the Board of Directors.

Business Analysis: If legislative efforts authorizing the use of alternative delivery methods are successful, after initial costs of implementation, staff anticipates beneficial fiscal impacts that will be identified in the full assessment of costs and benefits.

Option #2

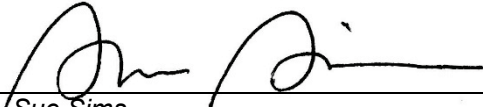
Do not authorize the General Manager to seek legislation for Metropolitan to utilize alternative project delivery methods for construction of the RRWP and drought-related projects in addition to traditional Design-Bid-Build.

Fiscal Impact: Metropolitan would forgo any potential cost and schedule-saving benefits that could be obtained by alternative delivery methods.

Business Analysis: Absent proposed legislation, Metropolitan would continue to implement traditional DBB.

Staff Recommendation


Option #1



Sue Sims
External Affairs Manager

9/30/2021

Date



Adel Hagekhalil
General Manager

10/5/2021

Date

Ref# ea12685451



Legislation for Metropolitan to Utilize Alternative Project Delivery Methods

Communication and Legislation Committee

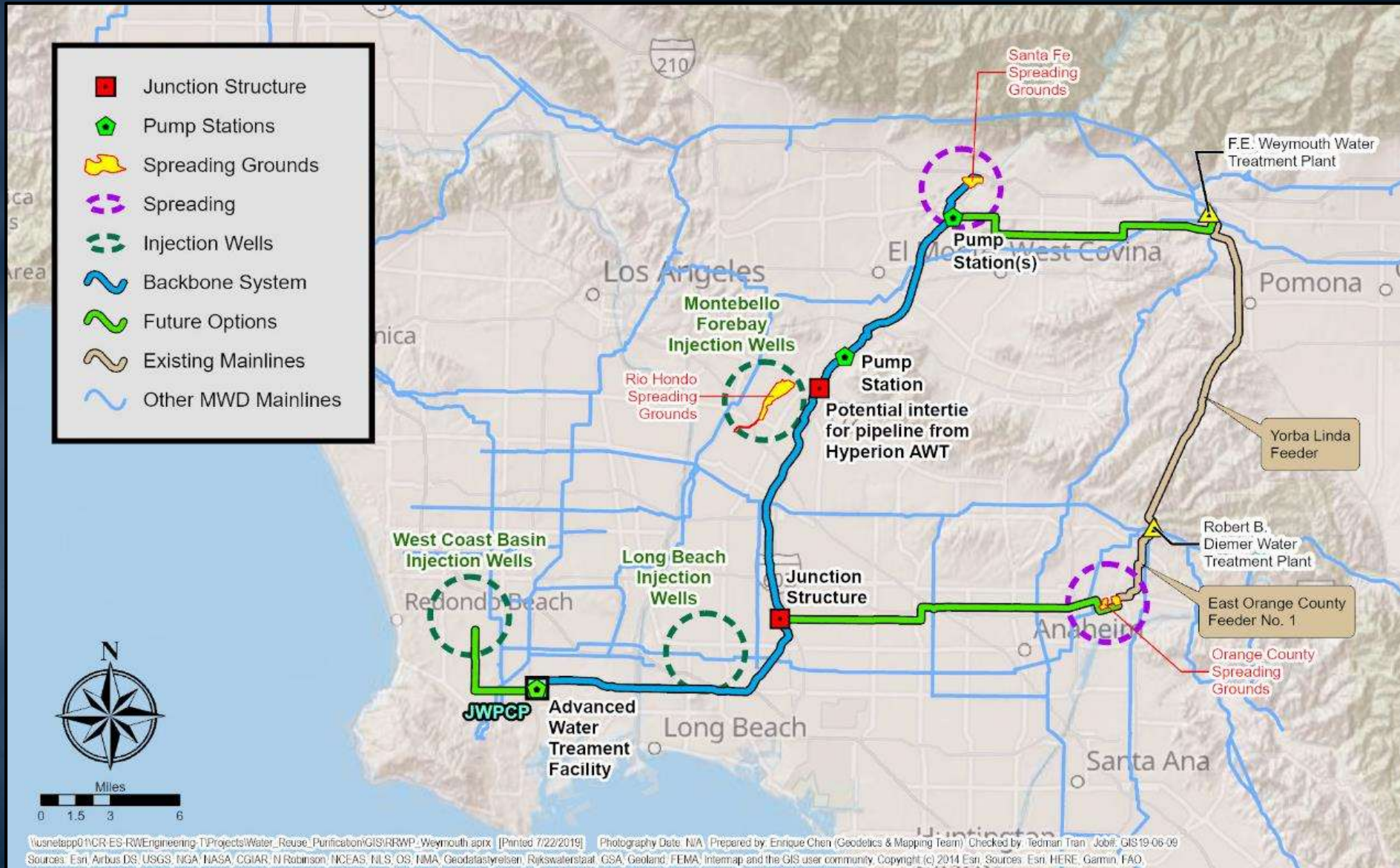
Item #7-6

October 11, 2021

Proposed Action

- Authorize the General Manager to seek legislation for Metropolitan to utilize alternative project delivery methods for construction of the Regional Recycled Water Program and drought-related projects; the General Manager has determined that the proposed action is exempt or otherwise not subject to CEQA.

Regional Recycled Water Program

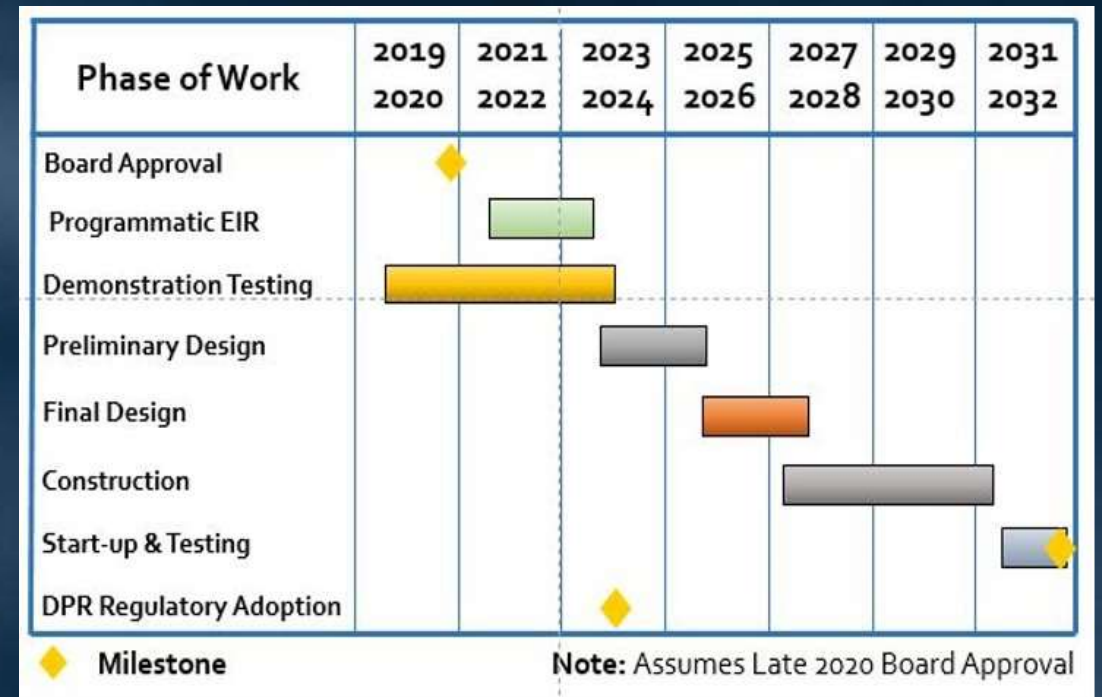


Potential Acceleration of Program/Projects

- Alternative RRWP acceleration ideas previously developed
 - 2019 Conceptual Planning Report
 - 2019 White Paper No. 1
- Advent of potential outside funding opportunities
 - Federal funding for large regional program
 - State funding approved FY 2021-22 budget and in future years
- Continuation of dry hydrologic conditions
- Selected drought-reliability projects may also benefit
 - Sepulveda Feeder pump station(s)
 - PC-1 pump station

Opportunities for Program/Project Acceleration

- Metropolitan's current approach
 - Linear Design-Bid-Build contracting
 - Design follows CEQA approval
 - RRWP critical path through
 - CEQA preparation/certification
 - AWT design/construction
 - Online date Phase 1: 2032
 - Drought reliability projects
 - Will follow similar course as RRWP
 - Typical 5-to-7-year cycle for pump station



Current RRWP Schedule

Current Project Delivery Methodology

- Metropolitan is currently limited to the traditional design-bid-build (DBB) for public works construction projects
- This traditional process is appropriate for most public works projects
- May be inefficient and inflexible for large, time-sensitive, and complex projects such as the RRWP and certain drought-related projects
- Metropolitan would benefit from a broader range of contracting options

Utilization of Alternative Delivery

- Local agencies with authority
 - LACSD
 - West Basin MWD
 - LADWP (project specific authority)
 - Water Replenishment District (ARC facility)
- Common methods in industry
 - Design Build (DB)
 - Progressive Design Build (PDB)
 - Construction Manager/General Contractor (CM/GC)



West Basin MWD – Edward C. Little WTP

Alternative Delivery Methods

Potential benefits

- ✓ Potential for schedule advancement
- ✓ Enhanced allocation of project risks
- ✓ Opportunities for Owner/Contractor collaboration
- ✓ Early pricing certainty

Potential downsides

- × Legislative action required to implement
- × Development of new MWD contract documents
- × Acquire and train staff

Pathway to Alternative Method Authorization

- Secure legislative approval
 - Potential availability: January 2023
- Scope of Legislation
 - Targeted approach
 - RRWP and drought reliability projects
 - Three additional delivery approaches recommended
 - Apply to design and construction activities only
 - Subsequent operations and maintenance by Metropolitan staff
 - Oppose attempts to shift operations and maintenance to the private sector.
 - Coordinate approach with Metropolitan bargaining units

Board Options

- Option #1
 - Authorize the General Manager to seek legislation for Metropolitan to utilize alternative project delivery methods for construction of the RRWP and drought-related projects.
- Option #2
 - Do not authorize the General Manager to seek legislation.

Staff Recommendations

- Option #1





• **Board of Directors**
Organization, Personnel and Technology Committee

10/12/2021 Board Meeting

7-7

Subject

Approve the Metropolitan Water District of Southern California's salary schedules pursuant to CalPERS regulations; the General Manager has determined that the proposed action is exempt or otherwise not subject to CEQA

Executive Summary

Pursuant to the California Code of Regulations, Section 570.5, Metropolitan's Board of Directors is required to approve an annual salary schedule, meeting specific requirements as outlined in the Code.

Details

Background

Pursuant to CalPERS regulations, California Code of Regulations, Section 570.5, employee salaries must be delineated in a salary schedule that meets the following requirements:

1. Approved and adopted by the employer's governing body according to the requirements of applicable public meeting laws.
2. Identifies the position title for every employee position.
3. Shows pay rate for each identified position, which may be stated as a single amount or amounts within a range.
4. Indicates the time base.
5. Is posted at the office of the employer or immediately accessible and available for public review from the employer during normal business hours or posted on the employer's internet website.
6. Indicates an effective date and date of any revisions.
7. Is retained by the employer and available for public inspection for not less than five years.
8. Does not reference another document in lieu of disclosing the pay rate.

To comply with these requirements, the Metropolitan Water District of Southern California's salary schedules for the following dates are attached for the Board's approval.

Effective date:

- June 28, 2020 (**Attachment 1**)
- June 27, 2021 (**Attachment 2**)

The approval of these salary schedules will ensure Metropolitan's compliance with the California Code, the negotiated Memoranda of Understanding (MOUs), and Administrative Codes. This will also ensure employees' retirement calculations will be based on the appropriate rate of pay.

Policy

Metropolitan Water District Administrative Code Section 6207: Positions Authorized

Metropolitan Water District Administrative Code Section 6208: Pay Rate Administration

Metropolitan Water District Administrative Code Section 6500: Hourly Pay Rate Schedule

Metropolitan Water District Administrative Code Section 11104: Delegations of Responsibilities

California Environmental Quality Act (CEQA)

CEQA determination for Option #1:

The proposed action is not defined as a project under CEQA (Public Resources Code Section 21065, State CEQA Guidelines Section 15378) because the proposed action will not cause either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment and involves continuing administrative activities, such as general policy and procedure making (Section 15378(b)(2) of the State CEQA Guidelines). In addition, the proposed action is not defined as a project under CEQA because it involves the creation of government funding mechanisms or other government fiscal activities which do not involve any commitment to any specific project, which may result in a potentially significant physical impact on the environment (Section 15378(b)(4) of the State CEQA Guidelines).

CEQA determination for Option #2:

None required

Board Options

Option #1

Approve the attached salary schedules.

Fiscal Impact: There is no fiscal impact associated with this board action.

Business Analysis: If approved, Metropolitan will be in compliance with the California Code of Regulations, Section 570.5, and the negotiated MOUs.

Option #2

Do not approve the salary schedules.

Fiscal Impact: None

Business Analysis: If not approved, Metropolitan will not be in compliance with the California Code of Regulations, Section 570.5, and the negotiated MOUs.

Staff Recommendation

Option #1



Diane Pitman
Human Resources Group Manager

9/21/2021

Date



Adel Hagekhalil
General Manager

9/22/2021

Date

**Attachment 1 – Metropolitan Water District of Southern California Salary Schedule effective
June 28, 2020**

**Attachment 2 – Metropolitan Water District of Southern California Salary Schedule effective
June 27, 2021**

Ref# hr12677510

Metropolitan Water District of Southern California

Report ID: MHR828

SALARY SCHEDULE

Page No. 1

Run Date 09/09/2021

Run Time 08:23:11

Effective Date: 06/28/2020

Classification Code	Title	Salary Grade	Hourly Range	Monthly Range	Annual Range	Unit Code
YA01	Accountant	038	\$ 33.78- 44.43	\$ 5,855- 7,701	\$ 70,262- 92,414	02
VA01	Accounting Tech I	029	\$ 26.37- 34.72	\$ 4,571- 6,018	\$ 54,850- 72,218	02
VA02	Accounting Tech II	034	\$ 30.27- 39.81	\$ 5,247- 6,900	\$ 62,962- 82,805	02
Z27	* Accounts Payable Administrator	053	\$ 51.01- 66.83	\$ 8,842-11,584	\$106,101-139,006	04
Z69	* Accounts Receivable Adminstr	053	\$ 51.01- 66.83	\$ 8,842-11,584	\$106,101-139,006	04
YA04	Admin Analyst	044	\$ 39.81- 52.43	\$ 6,900- 9,088	\$ 82,805-109,054	02
YC01	Admin Analyst I (C)	039	\$ 34.72- 45.65	\$ 6,018- 7,913	\$ 72,218- 94,952	05
YC02	Admin Analyst II (C)	042	\$ 37.68- 49.64	\$ 6,531- 8,604	\$ 78,374-103,251	05
YC03	* Admin Analyst III (C)	045	\$ 40.93- 53.90	\$ 7,095- 9,343	\$ 85,134-112,112	05
VA04	Admin Assistant I	031	\$ 27.84- 36.65	\$ 4,826- 6,353	\$ 57,907- 76,232	02
VC01	Admin Assistant I (C)	031	\$ 27.84- 36.65	\$ 4,826- 6,353	\$ 57,907- 76,232	05
VA05	Admin Assistant II	035	\$ 31.16- 40.93	\$ 5,401- 7,095	\$ 64,813- 85,134	02
VC02	Admin Assistant II (C)	035	\$ 31.16- 40.93	\$ 5,401- 7,095	\$ 64,813- 85,134	05
VA06	Admin Assistant III	039	\$ 34.72- 45.65	\$ 6,018- 7,913	\$ 72,218- 94,952	02
VC03	Admin Assistant III (C)	039	\$ 34.72- 45.65	\$ 6,018- 7,913	\$ 72,218- 94,952	05
UA04	Admin Secretary	037	\$ 32.85- 43.24	\$ 5,694- 7,495	\$ 68,328- 89,939	02
PM034	* Agricultural Liaison	060	\$ 61.66- 80.58	\$10,688-13,967	\$128,253-167,606	04
937	Aircraft Pilot	046	\$ 42.04- 55.38	\$ 7,287- 9,599	\$ 87,443-115,190	03
TA12	Aqueduct & Power Dispatcher	045	\$ 40.93- 53.90	\$ 7,095- 9,343	\$ 85,134-112,112	02
T11	Aqueduct Pump Specialist	046	\$ 42.04- 55.38	\$ 7,287- 9,599	\$ 87,443-115,190	02
YC62	* Assistant Ethics Officer	063	\$ 66.83- 87.36	\$11,584-15,142	\$139,006-181,709	05
YA08	Assoc Biologist	043	\$ 38.75- 51.01	\$ 6,717- 8,842	\$ 80,600-106,101	02
YA16	Assoc Chemist	043	\$ 38.75- 51.01	\$ 6,717- 8,842	\$ 80,600-106,101	02
YC18	* Assoc Dpty General Counsel (C)	060	\$ 61.66- 80.58	\$10,688-13,967	\$128,253-167,606	05
YA26	Assoc Engineer	050	\$ 46.97- 61.66	\$ 8,141-10,688	\$ 97,698-128,253	02
YA30	Assoc Environmental Specialist	048	\$ 44.43- 58.43	\$ 7,701-10,128	\$ 92,414-121,534	02
YA51	Assoc IT Proj Contr Specialist	039	\$ 34.72- 45.65	\$ 6,018- 7,913	\$ 72,218- 94,952	02
YA71	Assoc Limnologist	043	\$ 38.75- 51.01	\$ 6,717- 8,842	\$ 80,600-106,101	02
YA76	Assoc Microbiologist	043	\$ 38.75- 51.01	\$ 6,717- 8,842	\$ 80,600-106,101	02
YA84	Assoc Proj Controls Specialist	038	\$ 33.78- 44.43	\$ 5,855- 7,701	\$ 70,262- 92,414	02
YA97	Assoc Resource Specialist	049	\$ 45.65- 60.05	\$ 7,913-10,409	\$ 94,952-124,904	02
WC02	Assoc Security Specialist (C)	049	\$ 45.65- 60.05	\$ 7,913-10,409	\$ 94,952-124,904	05
YA100	Assoc Water Quality Specialist	043	\$ 38.75- 51.01	\$ 6,717- 8,842	\$ 80,600-106,101	02
YA07	Asst Biologist	038	\$ 33.78- 44.43	\$ 5,855- 7,701	\$ 70,262- 92,414	02
YC63	* Asst Board Administrator	056	\$ 55.38- 72.44	\$ 9,599-12,556	\$115,190-150,675	05
YA15	Asst Chemist	038	\$ 33.78- 44.43	\$ 5,855- 7,701	\$ 70,262- 92,414	02
YA24	Asst Engineer I	043	\$ 38.75- 51.01	\$ 6,717- 8,842	\$ 80,600-106,101	02
YA25	Asst Engineer II	046	\$ 42.04- 55.38	\$ 7,287- 9,599	\$ 87,443-115,190	02
YA28	Asst Env Specialist I	038	\$ 33.78- 44.43	\$ 5,855- 7,701	\$ 70,262- 92,414	02
YA29	Asst Env Specialist II	043	\$ 38.75- 51.01	\$ 6,717- 8,842	\$ 80,600-106,101	02
Z12	* Asst GM Strategic Wtr Initiatv	093	\$115.96-158.42	\$20,100-27,459	\$241,197-329,514	01
985	* Asst General Auditor	081	\$ 83.74-114.42	\$14,515-19,833	\$174,179-237,994	01
032	* Asst General Counsel	086	\$ 95.89-130.99	\$16,621-22,705	\$199,451-272,459	01
Z55	* Asst General Counsel (C)	078	\$ 99.89-130.99	\$17,314-22,705	\$207,771-272,459	05
024	* Asst General Manager/CAO	093	\$115.96-158.42	\$20,100-27,459	\$241,197-329,514	01
Z14	* Asst General Manager/CEAO	093	\$115.96-158.42	\$20,100-27,459	\$241,197-329,514	01
006	* Asst General Manager/CFO	093	\$115.96-158.42	\$20,100-27,459	\$241,197-329,514	01
002	* Asst General Manager/COO	094	\$119.11-162.80	\$20,646-28,219	\$247,749-338,624	01
Z02	* Asst Group Manager	085	\$ 93.33-127.49	\$16,177-22,098	\$194,126-265,179	01
YA50	Asst IT Proj Contrl Specialist	033	\$ 29.42- 38.75	\$ 5,099- 6,717	\$ 61,194- 80,600	02
YA70	Asst Limnologist	038	\$ 33.78- 44.43	\$ 5,855- 7,701	\$ 70,262- 92,414	02
YA75	Asst Microbiologist	038	\$ 33.78- 44.43	\$ 5,855- 7,701	\$ 70,262- 92,414	02
YA83	Asst Proj Controls Specialist	033	\$ 29.42- 38.75	\$ 5,099- 6,717	\$ 61,194- 80,600	02
YA95	Asst Resource Specialist I	042	\$ 37.68- 49.64	\$ 6,531- 8,604	\$ 78,374-103,251	02
YA96	Asst Resource Specialist II	045	\$ 40.93- 53.90	\$ 7,095- 9,343	\$ 85,134-112,112	02
Z04C	* Asst Section Manager II (C)	067	\$ 74.36- 97.22	\$12,889-16,851	\$154,669-202,218	05
TA15	Asst System Operator	041	\$ 36.65- 48.22	\$ 6,353- 8,358	\$ 76,232-100,298	02
295	* Asst Treasurer	057	\$ 56.89- 74.36	\$ 9,861-12,889	\$118,331-154,669	04
Z52	* Asst Unit Mgr-Conveyance&Distr	064	\$ 68.60- 89.70	\$11,891-15,548	\$142,688-186,576	04
YA99	Asst Water Quality Specialist	038	\$ 33.78- 44.43	\$ 5,855- 7,701	\$ 70,262- 92,414	02
Z32	* Audit Administrator	073	\$ 67.45- 92.11	\$11,691-15,966	\$140,296-191,589	01
Z29	* Bay-Delta Initiatives Manager	086	\$ 95.89-130.99	\$16,621-22,705	\$199,451-272,459	01
Z68	* Bay-Delta InitiativesPolicyMgr	085	\$ 93.33-127.49	\$16,177-22,098	\$194,126-265,179	01
YA09	Biologist	048	\$ 44.43- 58.43	\$ 7,701-10,128	\$ 92,414-121,534	02
Z64	* Board Administrator	072	\$ 65.64- 89.70	\$11,378-15,548	\$136,531-186,576	01
U04	* Board Executive Secretary	066	\$ 55.99- 76.34	\$ 9,705-13,232	\$116,459-158,787	01
YC06	* Board Specialist (C)	045	\$ 40.93- 53.90	\$ 7,095- 9,343	\$ 85,134-112,112	05
Z65	* Budget and Treasury Manager	081	\$ 83.74-114.42	\$14,515-19,833	\$174,179-237,994	01
Z09	* Business Outreach Manager	060	\$ 61.66- 80.58	\$10,688-13,967	\$128,253-167,606	04
YA12	Buyer I	038	\$ 33.78- 44.43	\$ 5,855- 7,701	\$ 70,262- 92,414	02

Metropolitan Water District of Southern California

Report ID: MHR828

SALARY SCHEDULE

Page No. 2

Run Date 09/09/2021

Run Time 08:23:11

Effective Date: 06/28/2020

Classification Code	Title	Salary Grade	Hourly Range	Monthly Range	Annual Range	Unit Code
YA13	Buyer II	043	\$ 38.75- 51.01	\$ 6,717- 8,842	\$ 80,600-106,101	02
YA17	Chemist	048	\$ 44.43- 58.43	\$ 7,701-10,128	\$ 92,414-121,534	02
SA06	Chief Cook	024	\$ 22.93- 30.27	\$ 3,975- 5,247	\$ 47,694- 62,962	02
Y08	* Chief Deputy General Counsel	085	\$ 93.33-127.49	\$16,177-22,098	\$194,126-265,179	01
YC21	* Chief Dpty General Counsel (C)	074	\$ 89.70-117.52	\$15,548-20,370	\$186,576-244,442	05
XA47	Chief Photographer	048	\$ 44.43- 58.43	\$ 7,701-10,128	\$ 92,414-121,534	02
XA65	Chief Videographer	048	\$ 44.43- 58.43	\$ 7,701-10,128	\$ 92,414-121,534	02
122	Chief of Party	053	\$ 51.01- 66.83	\$ 8,842-11,584	\$106,101-139,006	03
Z42	* Class & Comp Manager	064	\$ 68.60- 89.70	\$11,891-15,548	\$142,688-186,576	05
SA04	Commercial Truck Driver A	037	\$ 32.85- 43.24	\$ 5,694- 7,495	\$ 68,328- 89,939	02
SA05A	Commercial Truck Driver B	037	\$ 32.85- 43.24	\$ 5,694- 7,495	\$ 68,328- 89,939	02
XA01A	Construction Inspector I	038	\$ 33.78- 44.43	\$ 5,855- 7,701	\$ 70,262- 92,414	02
XA02A	Construction Inspector II	043	\$ 38.75- 51.01	\$ 6,717- 8,842	\$ 80,600-106,101	02
XA03A	Construction Inspector III	048	\$ 44.43- 58.43	\$ 7,701-10,128	\$ 92,414-121,534	02
XA04A	Construction Inspector IV	053	\$ 51.01- 66.83	\$ 8,842-11,584	\$106,101-139,006	02
XA05A	Construction Inspector V	056	\$ 55.38- 72.44	\$ 9,599-12,556	\$115,190-150,675	02
Z36	* Controller	072	\$ 85.02-111.35	\$14,737-19,301	\$176,842-231,608	05
T04	Conveyance&Distrbtn Specialist	047	\$ 43.24- 56.89	\$ 7,495- 9,861	\$ 89,939-118,331	02
XA06	Crane Certification Tech I	038	\$ 33.78- 44.43	\$ 5,855- 7,701	\$ 70,262- 92,414	02
XA07	Crane Certification Tech II	043	\$ 38.75- 51.01	\$ 6,717- 8,842	\$ 80,600-106,101	02
XA09	Cross Connection Technician	043	\$ 38.75- 51.01	\$ 6,717- 8,842	\$ 80,600-106,101	02
PM030	* Debt Management Specialist	060	\$ 61.66- 80.58	\$10,688-13,967	\$128,253-167,606	04
YA20	Deputy Auditor I	031	\$ 27.84- 36.65	\$ 4,826- 6,353	\$ 57,907- 76,232	02
YA21	Deputy Auditor II	036	\$ 32.02- 42.04	\$ 5,550- 7,287	\$ 66,602- 87,443	02
YA22	Deputy Auditor III	045	\$ 40.93- 53.90	\$ 7,095- 9,343	\$ 85,134-112,112	02
Z57	* Deputy General Auditor	077	\$ 75.11-102.64	\$13,019-17,791	\$156,229-213,491	01
YC19	* Deputy General Counsel (C)	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	05
VA07	Deputy Treasurer	048	\$ 44.43- 58.43	\$ 7,701-10,128	\$ 92,414-121,534	02
XA11	Designer I	032	\$ 28.65- 37.68	\$ 4,966- 6,531	\$ 59,592- 78,374	02
XA12	Designer II	035	\$ 31.16- 40.93	\$ 5,401- 7,095	\$ 64,813- 85,134	02
XA13	Designer III	039	\$ 34.72- 45.65	\$ 6,018- 7,913	\$ 72,218- 94,952	02
Z41	* Director of Info Tech Services	072	\$ 85.02-111.35	\$14,737-19,301	\$176,842-231,608	04
T14	Diver-Inland Commercial	047	\$ 43.24- 56.89	\$ 7,495- 9,861	\$ 89,939-118,331	02
YC61	* DptyEthicsOfcr Adv,Comp&Policy	060	\$ 61.66- 80.58	\$10,688-13,967	\$128,253-167,606	05
YC60	* DptyEthicsOfcr Inv,Outrch&Educ	060	\$ 61.66- 80.58	\$10,688-13,967	\$128,253-167,606	05
Z25	* EEO Manager	068	\$ 76.34- 99.89	\$13,232-17,314	\$158,787-207,771	05
YC25	EHS Field Specialist I (C)	043	\$ 38.75- 51.01	\$ 6,717- 8,842	\$ 80,600-106,101	05
YC26	EHS Field Specialist II (C)	045	\$ 40.93- 53.90	\$ 7,095- 9,343	\$ 85,134-112,112	05
YC27	EHS Field Specialist III (C)	050	\$ 46.97- 61.66	\$ 8,141-10,688	\$ 97,698-128,253	05
T12	Electrical Specialist	048	\$ 44.43- 58.43	\$ 7,701-10,128	\$ 92,414-121,534	02
168	* Electronic Tech Supervisor	055	\$ 53.90- 70.43	\$ 9,343-12,208	\$112,112-146,494	03
YC42	* Employee Relations Specialist	051	\$ 48.22- 63.35	\$ 8,358-10,981	\$100,298-131,768	05
YA27	Engineer	056	\$ 55.38- 72.44	\$ 9,599-12,556	\$115,190-150,675	02
XA20A	Engineering Tech I	038	\$ 33.78- 44.43	\$ 5,855- 7,701	\$ 70,262- 92,414	02
XA21A	Engineering Tech II	043	\$ 38.75- 51.01	\$ 6,717- 8,842	\$ 80,600-106,101	02
XA22A	Engineering Tech III	048	\$ 44.43- 58.43	\$ 7,701-10,128	\$ 92,414-121,534	02
YA31	Environmental Specialist	053	\$ 51.01- 66.83	\$ 8,842-11,584	\$106,101-139,006	02
Z59	* Equal Emp Compliance&Policy Co	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	05
Z16	* Ethics Officer	FR			\$218,005	00
YC35	* Ethics Policy Analyst	060	\$ 61.66- 80.58	\$10,688-13,967	\$128,253-167,606	05
VC04	Executive Assistant I (C)	044	\$ 39.81- 52.43	\$ 6,900- 9,088	\$ 82,805-109,054	05
VC05	Executive Assistant II (C)	048	\$ 44.43- 58.43	\$ 7,701-10,128	\$ 92,414-121,534	05
VC13	* Executive Assistant to the GC	051	\$ 48.22- 63.35	\$ 8,358-10,981	\$100,298-131,768	05
VC14	* Executive Assistant to the GM	051	\$ 48.22- 63.35	\$ 8,358-10,981	\$100,298-131,768	05
021	* Executive Legislative Rep	081	\$ 83.74-114.42	\$14,515-19,833	\$174,179-237,994	01
Z56	* Executive Legislative Rep (C)	073	\$ 87.36-114.42	\$15,142-19,833	\$181,709-237,994	05
061	* Executive Secretary	051	\$ 48.22- 63.35	\$ 8,358-10,981	\$100,298-131,768	04
017	* Executive Strategist	073	\$ 87.36-114.42	\$15,142-19,833	\$181,709-237,994	05
SA07	Facilities Maint Assistant	029	\$ 26.37- 34.72	\$ 4,571- 6,018	\$ 54,850- 72,218	02
TA14	Facilities Maint Mechanic	037	\$ 32.85- 43.24	\$ 5,694- 7,495	\$ 68,328- 89,939	02
YA32	Fleet Coordinator	048	\$ 44.43- 58.43	\$ 7,701-10,128	\$ 92,414-121,534	02
VA17	Fleet Dispatch Coordinator	035	\$ 31.16- 40.93	\$ 5,401- 7,095	\$ 64,813- 85,134	02
VA16	Fleet Dispatcher	031	\$ 27.84- 36.65	\$ 4,826- 6,353	\$ 57,907- 76,232	02
041	* General Auditor	FR			\$260,749	00
031	* General Counsel	FR			\$325,166	00
706	General Maintenance Asst	021	\$ 21.15- 27.84	\$ 3,666- 4,826	\$ 43,992- 57,907	02
001	* General Manager	FR			\$434,990	00
YC22	* Government&Regional Aff Rep(C)	052	\$ 49.64- 65.03	\$ 8,604-11,272	\$103,251-135,262	05
YA37	Graphic Arts Designer	048	\$ 44.43- 58.43	\$ 7,701-10,128	\$ 92,414-121,534	02
XA24	Graphic Technician I	034	\$ 30.27- 39.81	\$ 5,247- 6,900	\$ 62,962- 82,805	02

Metropolitan Water District of Southern California

Report ID: MHR828

SALARY SCHEDULE

Page No. 3

Run Date 09/09/2021

Effective Date: 06/28/2020

Run Time 08:23:11

Classification Code	Title	Salary Grade	Hourly Range	Monthly Range	Annual Range	Unit Code
XA25	Graphic Technician II	038	\$ 33.78- 44.43	\$ 5,855- 7,701	\$ 70,262- 92,414	02
XA26	Graphic Technician III	043	\$ 38.75- 51.01	\$ 6,717- 8,842	\$ 80,600-106,101	02
SA08	Grounds Maintenance Worker	029	\$ 26.37- 34.72	\$ 4,571- 6,018	\$ 54,850- 72,218	02
Z01	* Group Manager	086	\$ 95.89-130.99	\$16,621-22,705	\$199,451-272,459	01
Z60	* Group Manager-Engineering Svcs	089	\$103.98-142.16	\$18,023-24,641	\$216,278-295,693	01
Z58	* Group Manager-External Affairs	086	\$ 95.89-130.99	\$16,621-22,705	\$199,451-272,459	01
Z54	* Group Manager-Human Resources	086	\$ 95.89-130.99	\$16,621-22,705	\$199,451-272,459	01
Z66	* Group Manager-Info Technology	088	\$101.23-138.31	\$17,547-23,974	\$210,558-287,685	01
Z61	* Group Manager-Real Property	086	\$ 95.89-130.99	\$16,621-22,705	\$199,451-272,459	01
Z62	* Group Manager-Water Resrc Mgmt	088	\$101.23-138.31	\$17,547-23,974	\$210,558-287,685	01
Z63	* Group Manager-Water System Ops	089	\$103.98-142.16	\$18,023-24,641	\$216,278-295,693	01
VC06	HR Assistant I (C)	031	\$ 27.84- 36.65	\$ 4,826- 6,353	\$ 57,907- 76,232	05
VC07	HR Assistant II (C)	035	\$ 31.16- 40.93	\$ 5,401- 7,095	\$ 64,813- 85,134	05
VC08	HR Assistant III (C)	039	\$ 34.72- 45.65	\$ 6,018- 7,913	\$ 72,218- 94,952	05
UMA03	* HR Strategic Partner	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	05
Z40	* HRIS Manager	063	\$ 66.83- 87.36	\$11,584-15,142	\$139,006-181,709	05
YC30	Human Resources Analyst I (C)	039	\$ 34.72- 45.65	\$ 6,018- 7,913	\$ 72,218- 94,952	05
YC31	Human Resources Analyst II (C)	042	\$ 37.68- 49.64	\$ 6,531- 8,604	\$ 78,374-103,251	05
YC32	* Human Resources Analyst III(C)	045	\$ 40.93- 53.90	\$ 7,095- 9,343	\$ 85,134-112,112	05
VC09	Human Resources Coordinator	041	\$ 36.65- 48.22	\$ 6,353- 8,358	\$ 76,232-100,298	05
Z22	* Human Resources Manager I	075	\$ 71.13- 97.22	\$12,329-16,851	\$147,950-202,218	01
Z23	* Human Resources Manager II	078	\$ 77.16-105.43	\$13,374-18,275	\$160,493-219,294	01
Z24	* Human Resources Manager III	081	\$ 83.74-114.42	\$14,515-19,833	\$174,179-237,994	01
Z03D	* Human Resources Section Mgr	080	\$ 81.46-111.35	\$14,120-19,301	\$169,437-231,608	01
T08	Hydroelectric Specialist I	042	\$ 37.68- 49.64	\$ 6,531- 8,604	\$ 78,374-103,251	02
T05	Hydroelectric Specialist II	048	\$ 44.43- 58.43	\$ 7,701-10,128	\$ 92,414-121,534	02
530	* Hydroelectric Supervisor	058	\$ 58.43- 76.34	\$10,128-13,232	\$121,534-158,787	03
Y12	* IT Architect-Enterprsr Software	063	\$ 66.83- 87.36	\$11,584-15,142	\$139,006-181,709	04
YA106	IT Business Analyst I	037	\$ 32.85- 43.24	\$ 5,694- 7,495	\$ 68,328- 89,939	02
YA107	IT Business Analyst II	042	\$ 37.68- 49.64	\$ 6,531- 8,604	\$ 78,374-103,251	02
YA108	IT Business Analyst III	047	\$ 43.24- 56.89	\$ 7,495- 9,861	\$ 89,939-118,331	02
XA27A	IT Communication Tech I	038	\$ 33.78- 44.43	\$ 5,855- 7,701	\$ 70,262- 92,414	02
XA28A	IT Communication Tech II	043	\$ 38.75- 51.01	\$ 6,717- 8,842	\$ 80,600-106,101	02
XA29A	IT Communication Tech III	047	\$ 43.24- 56.89	\$ 7,495- 9,861	\$ 89,939-118,331	02
YA38	IT Enterprise App Analyst I	037	\$ 32.85- 43.24	\$ 5,694- 7,495	\$ 68,328- 89,939	02
YA39	IT Enterprise App Analyst II	042	\$ 37.68- 49.64	\$ 6,531- 8,604	\$ 78,374-103,251	02
YA40	IT Enterprise App Analyst III	047	\$ 43.24- 56.89	\$ 7,495- 9,861	\$ 89,939-118,331	02
YA33	IT GIS Analyst I	037	\$ 32.85- 43.24	\$ 5,694- 7,495	\$ 68,328- 89,939	02
YA34	IT GIS Analyst II	042	\$ 37.68- 49.64	\$ 6,531- 8,604	\$ 78,374-103,251	02
YA35	IT GIS Analyst III	047	\$ 43.24- 56.89	\$ 7,495- 9,861	\$ 89,939-118,331	02
YA42	IT Infrastructure Adminstr I	037	\$ 32.85- 43.24	\$ 5,694- 7,495	\$ 68,328- 89,939	02
YA43	IT Infrastructure Adminstr II	042	\$ 37.68- 49.64	\$ 6,531- 8,604	\$ 78,374-103,251	02
YA44	IT Infrastructure Adminstr III	047	\$ 43.24- 56.89	\$ 7,495- 9,861	\$ 89,939-118,331	02
YA46	IT Network Engineer I	037	\$ 32.85- 43.24	\$ 5,694- 7,495	\$ 68,328- 89,939	02
YA47	IT Network Engineer II	042	\$ 37.68- 49.64	\$ 6,531- 8,604	\$ 78,374-103,251	02
YA48	IT Network Engineer III	047	\$ 43.24- 56.89	\$ 7,495- 9,861	\$ 89,939-118,331	02
YA52	IT Project Controls Specialist	044	\$ 39.81- 52.43	\$ 6,900- 9,088	\$ 82,805-109,054	02
YA54	IT Quality Analyst I	037	\$ 32.85- 43.24	\$ 5,694- 7,495	\$ 68,328- 89,939	02
YA55	IT Quality Analyst II	042	\$ 37.68- 49.64	\$ 6,531- 8,604	\$ 78,374-103,251	02
YA56	IT Quality Analyst III	047	\$ 43.24- 56.89	\$ 7,495- 9,861	\$ 89,939-118,331	02
PM032	* IT Service Manager	064	\$ 68.60- 89.70	\$11,891-15,548	\$142,688-186,576	04
YA58	IT Software Developer I	037	\$ 32.85- 43.24	\$ 5,694- 7,495	\$ 68,328- 89,939	02
YA59	IT Software Developer II	042	\$ 37.68- 49.64	\$ 6,531- 8,604	\$ 78,374-103,251	02
YA60	IT Software Developer III	047	\$ 43.24- 56.89	\$ 7,495- 9,861	\$ 89,939-118,331	02
Y05	* IT Specialist -Disaster Recvry	058	\$ 58.43- 76.34	\$10,128-13,232	\$121,534-158,787	04
XA31A	IT Support Analyst I	037	\$ 32.85- 43.24	\$ 5,694- 7,495	\$ 68,328- 89,939	02
XA32A	IT Support Analyst II	042	\$ 37.68- 49.64	\$ 6,531- 8,604	\$ 78,374-103,251	02
XA33A	IT Support Analyst III	047	\$ 43.24- 56.89	\$ 7,495- 9,861	\$ 89,939-118,331	02
YA62	IT System Administrator I	037	\$ 32.85- 43.24	\$ 5,694- 7,495	\$ 68,328- 89,939	02
YA63	IT System Administrator II	042	\$ 37.68- 49.64	\$ 6,531- 8,604	\$ 78,374-103,251	02
YA64	IT System Administrator III	047	\$ 43.24- 56.89	\$ 7,495- 9,861	\$ 89,939-118,331	02
Y18	* Info Gov&Ent Content Mgmt Spec	059	\$ 60.05- 78.43	\$10,409-13,595	\$124,904-163,134	04
YC11	Info Tech Analyst I (C)	037	\$ 32.85- 43.24	\$ 5,694- 7,495	\$ 68,328- 89,939	05
YC12	Info Tech Analyst II (C)	042	\$ 37.68- 49.64	\$ 6,531- 8,604	\$ 78,374-103,251	05
YC13	* Info Tech Analyst III (C)	047	\$ 43.24- 56.89	\$ 7,495- 9,861	\$ 89,939-118,331	05
Y14	* Info Technology Architect	064	\$ 68.60- 89.70	\$11,891-15,548	\$142,688-186,576	04
Y06	* Inland Feeder Projects Admintr	058	\$ 58.43- 76.34	\$10,128-13,232	\$121,534-158,787	04
Y10	* Inspection Trip Manager	061	\$ 63.35- 82.75	\$10,981-14,343	\$131,768-172,120	04
Y17	* Inspection Trip Specialist	058	\$ 58.43- 76.34	\$10,128-13,232	\$121,534-158,787	04
184	Inspector IV	050	\$ 46.97- 61.66	\$ 8,141-10,688	\$ 97,698-128,253	03

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SALARY SCHEDULE

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Classification Code	Title	Salary Grade	Hourly Range	Monthly Range	Annual Range	Unit Code
XA16	Instrumnt&Cntrl Tech I	035	\$ 31.16- 40.93	\$ 5,401- 7,095	\$ 64,813- 85,134	02
XA17	Instrumnt&Cntrl Tech II	039	\$ 34.72- 45.65	\$ 6,018- 7,913	\$ 72,218- 94,952	02
XA18	Instrumnt&Cntrl Tech III	044	\$ 39.81- 52.43	\$ 6,900- 9,088	\$ 82,805-109,054	02
XA19	Instrumnt&Cntrl Tech Specialist	047	\$ 43.24- 56.89	\$ 7,495- 9,861	\$ 89,939-118,331	02
716	Inventory Coordinator	044	\$ 39.81- 52.43	\$ 6,900- 9,088	\$ 82,805-109,054	03
PM033	* Investment Mgmt Specialist	060	\$ 61.66- 80.58	\$10,688-13,967	\$128,253-167,606	04
XA35A	Lab Info Systems Specialist I	042	\$ 37.68- 49.64	\$ 6,531- 8,604	\$ 78,374-103,251	02
XA36A	Lab Info Systems Specialist II	048	\$ 44.43- 58.43	\$ 7,701-10,128	\$ 92,414-121,534	02
UA16	Laboratory Assistant I	025	\$ 23.64- 31.16	\$ 4,098- 5,401	\$ 49,171- 64,813	02
UA17	Laboratory Assistant II	029	\$ 26.37- 34.72	\$ 4,571- 6,018	\$ 54,850- 72,218	02
XA40	Laboratory Technologist I	034	\$ 30.27- 39.81	\$ 5,247- 6,900	\$ 62,962- 82,805	02
XA41	Laboratory Technologist II	036	\$ 32.02- 42.04	\$ 5,550- 7,287	\$ 66,602- 87,443	02
YA66	Land Surveyor	053	\$ 51.01- 66.83	\$ 8,842-11,584	\$106,101-139,006	02
705	Landscape Maint Coordinator	044	\$ 39.81- 52.43	\$ 6,900- 9,088	\$ 82,805-109,054	03
XA42A	Landscape Maintenance Tech I	038	\$ 33.78- 44.43	\$ 5,855- 7,701	\$ 70,262- 92,414	02
XA43A	Landscape Maintenance Tech II	043	\$ 38.75- 51.01	\$ 6,717- 8,842	\$ 80,600-106,101	02
VA08	Law Clerk	029	\$ 26.37- 34.72	\$ 4,571- 6,018	\$ 54,850- 72,218	02
Z30	* Law Office Administrator (C)	059	\$ 60.05- 78.43	\$10,409-13,595	\$124,904-163,134	05
YA67	Legal Analyst	044	\$ 39.81- 52.43	\$ 6,900- 9,088	\$ 82,805-109,054	02
VA09	Legal Assistant I	033	\$ 29.42- 38.75	\$ 5,099- 6,717	\$ 61,194- 80,600	02
VA10	Legal Assistant II	037	\$ 32.85- 43.24	\$ 5,694- 7,495	\$ 68,328- 89,939	02
VA11	Legal Assistant III	041	\$ 36.65- 48.22	\$ 6,353- 8,358	\$ 76,232-100,298	02
UC01	Legal Secretary I (C)	028	\$ 25.60- 33.78	\$ 4,437- 5,855	\$ 53,248- 70,262	05
UC02	Legal Secretary II (C)	035	\$ 31.16- 40.93	\$ 5,401- 7,095	\$ 64,813- 85,134	05
YA104	Legal Technology Specialist	047	\$ 43.24- 56.89	\$ 7,495- 9,861	\$ 89,939-118,331	02
Y09	* Legislative Representative	048	\$ 44.43- 58.43	\$ 7,701-10,128	\$ 92,414-121,534	05
YA72	Limnologist	048	\$ 44.43- 58.43	\$ 7,701-10,128	\$ 92,414-121,534	02
T06	Lineman	046	\$ 42.04- 55.38	\$ 7,287- 9,599	\$ 87,443-115,190	02
SA09	Lodging Assistant I	029	\$ 26.37- 34.72	\$ 4,571- 6,018	\$ 54,850- 72,218	02
SA10	Lodging Assistant II	033	\$ 29.42- 38.75	\$ 5,099- 6,717	\$ 61,194- 80,600	02
UA08	Mailroom Assistant I	016	\$ 18.45- 24.27	\$ 3,198- 4,207	\$ 38,376- 50,482	02
UA09	Mailroom Assistant II	021	\$ 21.15- 27.84	\$ 3,666- 4,826	\$ 43,992- 57,907	02
UA10	Mailroom Assistant III	026	\$ 24.27- 32.02	\$ 4,207- 5,550	\$ 50,482- 66,602	02
620	Maintenance Mechanic I	037	\$ 32.85- 43.24	\$ 5,694- 7,495	\$ 68,328- 89,939	02
612	Maintenance Worker I	025	\$ 23.64- 31.16	\$ 4,098- 5,401	\$ 49,171- 64,813	02
613	Maintenance Worker II	029	\$ 26.37- 34.72	\$ 4,571- 6,018	\$ 54,850- 72,218	02
614	Maintenance Worker III	033	\$ 29.42- 38.75	\$ 5,099- 6,717	\$ 61,194- 80,600	02
Z39	* Manager of Admin Services	070	\$ 80.58-105.43	\$13,967-18,275	\$167,606-219,294	05
Z33	* Manager of Colo RiverResources	080	\$ 81.46-111.35	\$14,120-19,301	\$169,437-231,608	01
Z35	* Manager of Financial Services	072	\$ 85.02-111.35	\$14,737-19,301	\$176,842-231,608	05
SM020	* Manager of Treasury&Debt Mgmt	072	\$ 85.02-111.35	\$14,737-19,301	\$176,842-231,608	04
M81	* Mgt Pr Admin Analyst	055	\$ 53.90- 70.43	\$ 9,343-12,208	\$112,112-146,494	04
YA77	Microbiologist	048	\$ 44.43- 58.43	\$ 7,701-10,128	\$ 92,414-121,534	02
186	* Microcomputer Technology Supv	059	\$ 60.05- 78.43	\$10,409-13,595	\$124,904-163,134	03
636	* O & M Supervisor	055	\$ 53.90- 70.43	\$ 9,343-12,208	\$112,112-146,494	03
S03P	+ O&M Tech I	028	\$ 25.60- 33.78	\$ 4,437- 5,855	\$ 53,248- 70,262	02
S03	+ O&M Tech I	028	\$ 25.60- 33.78	\$ 4,437- 5,855	\$ 53,248- 70,262	02
S03A	+ O&M Tech I	027	\$ 24.92- 32.85	\$ 4,319- 5,694	\$ 51,834- 68,328	02
S02P	+ O&M Tech II	032	\$ 28.65- 37.68	\$ 4,966- 6,531	\$ 59,592- 78,374	02
S02	+ O&M Tech II	032	\$ 28.65- 37.68	\$ 4,966- 6,531	\$ 59,592- 78,374	02
S02A	+ O&M Tech II	031	\$ 27.84- 36.65	\$ 4,826- 6,353	\$ 57,907- 76,232	02
T10	+ O&M Tech III	036	\$ 32.02- 42.04	\$ 5,550- 7,287	\$ 66,602- 87,443	02
T10P	+ O&M Tech III	036	\$ 32.02- 42.04	\$ 5,550- 7,287	\$ 66,602- 87,443	02
T10A	+ O&M Tech III	035	\$ 31.16- 40.93	\$ 5,401- 7,095	\$ 64,813- 85,134	02
T03FS	+ O&M Tech IV	042	\$ 37.68- 49.64	\$ 6,531- 8,604	\$ 78,374-103,251	02
T03	+ O&M Tech IV	042	\$ 37.68- 49.64	\$ 6,531- 8,604	\$ 78,374-103,251	02
T03A	+ O&M Tech IV	041	\$ 36.65- 48.22	\$ 6,353- 8,358	\$ 76,232-100,298	02
YA80	Oc Health Safety Specialist I	031	\$ 27.84- 36.65	\$ 4,826- 6,353	\$ 57,907- 76,232	02
YA81	Oc Health Safety Specialist II	038	\$ 33.78- 44.43	\$ 5,855- 7,701	\$ 70,262- 92,414	02
YA82	Oc Health Safety Specialist III	043	\$ 38.75- 51.01	\$ 6,717- 8,842	\$ 80,600-106,101	02
927	* Occ Safety & Health Spec	054	\$ 52.43- 68.60	\$ 9,088-11,891	\$109,054-142,688	04
UA11	Office Assistant	026	\$ 24.27- 32.02	\$ 4,207- 5,550	\$ 50,482- 66,602	02
Z53	* Operations Program Manager	067	\$ 74.36- 97.22	\$12,889-16,851	\$154,669-202,218	04
SA11	Ops and Maintenance Assistant	021	\$ 21.15- 27.84	\$ 3,666- 4,826	\$ 43,992- 57,907	02
Z44	* Org Develop & Training Manager	064	\$ 68.60- 89.70	\$11,891-15,548	\$142,688-186,576	05
Z28	* Payroll Administrator	053	\$ 51.01- 66.83	\$ 8,842-11,584	\$106,101-139,006	04
XA45	Photographer I	035	\$ 31.16- 40.93	\$ 5,401- 7,095	\$ 64,813- 85,134	02
XA46	Photographer II	041	\$ 36.65- 48.22	\$ 6,353- 8,358	\$ 76,232-100,298	02
XA48	Planner Scheduler	043	\$ 38.75- 51.01	\$ 6,717- 8,842	\$ 80,600-106,101	02
139	* Plant Laboratory Supervisor	055	\$ 53.90- 70.43	\$ 9,343-12,208	\$112,112-146,494	03

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SALARY SCHEDULE

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Classification Code	Title	Salary Grade	Hourly Range	Monthly Range	Annual Range	Unit Code
519	* Plant Operations Supervisor	058	\$ 58.43- 76.34	\$10,128-13,232	\$121,534-158,787	03
Y20	* Postdoctoral Research Assoc	046	\$ 42.04- 55.38	\$ 7,287- 9,599	\$ 87,443-115,190	04
PM028	* Power Planning Specialist	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	04
YA03	Pr Accountant	049	\$ 45.65- 60.05	\$ 7,913-10,409	\$ 94,952-124,904	02
YC56	* Pr Admin Analyst	066	\$ 55.99- 76.34	\$ 9,705-13,232	\$116,459-158,787	01
YA06	Pr Admin Analyst	055	\$ 53.90- 70.43	\$ 9,343-12,208	\$112,112-146,494	02
YC05	* Pr Admin Analyst (C)	056	\$ 55.38- 72.44	\$ 9,599-12,556	\$115,190-150,675	05
Y16	* Pr Architect	064	\$ 68.60- 89.70	\$11,891-15,548	\$142,688-186,576	04
216	* Pr Auditor	058	\$ 58.43- 76.34	\$10,128-13,232	\$121,534-158,787	04
YC44	* Pr Benefits Analyst (C)	056	\$ 55.38- 72.44	\$ 9,599-12,556	\$115,190-150,675	05
YA11	Pr Biologist	058	\$ 58.43- 76.34	\$10,128-13,232	\$121,534-158,787	02
245	* Pr Buyer	055	\$ 53.90- 70.43	\$ 9,343-12,208	\$112,112-146,494	04
YA19	Pr Chemist	058	\$ 58.43- 76.34	\$10,128-13,232	\$121,534-158,787	02
YC50	* Pr Class & Comp Analyst (C)	056	\$ 55.38- 72.44	\$ 9,599-12,556	\$115,190-150,675	05
XA15	Pr Designer	048	\$ 44.43- 58.43	\$ 7,701-10,128	\$ 92,414-121,534	02
YC48	* Pr EEO Analyst (C)	056	\$ 55.38- 72.44	\$ 9,599-12,556	\$115,190-150,675	05
YC40	* Pr Emp Relations Specialist	060	\$ 61.66- 80.58	\$10,688-13,967	\$128,253-167,606	05
115	* Pr Engineer	064	\$ 68.60- 89.70	\$11,891-15,548	\$142,688-186,576	04
165	* Pr Engineering Technician	058	\$ 58.43- 76.34	\$10,128-13,232	\$121,534-158,787	04
925	* Pr Environmental Spec	063	\$ 66.83- 87.36	\$11,584-15,142	\$139,006-181,709	04
YC24	* Pr Government&Region AffRep(C)	060	\$ 61.66- 80.58	\$10,688-13,967	\$128,253-167,606	05
YC52	* Pr HR Training Specialist (C)	055	\$ 53.90- 70.43	\$ 9,343-12,208	\$112,112-146,494	05
YC46	* Pr HRIS Analyst (C)	056	\$ 55.38- 72.44	\$ 9,599-12,556	\$115,190-150,675	05
231	* Pr Info Tech Analyst	056	\$ 55.38- 72.44	\$ 9,599-12,556	\$115,190-150,675	04
YC15	* Pr Info Tech Analyst (C)	056	\$ 55.38- 72.44	\$ 9,599-12,556	\$115,190-150,675	05
YC64	* Pr Info Tech Network Engineer	058	\$ 58.43- 76.34	\$10,128-13,232	\$121,534-158,787	04
Y07	* Pr Land Surveyor	058	\$ 58.43- 76.34	\$10,128-13,232	\$121,534-158,787	04
YA69	Pr Legal Analyst	055	\$ 53.90- 70.43	\$ 9,343-12,208	\$112,112-146,494	02
022	* Pr Legislative Representative	062	\$ 65.03- 85.02	\$11,272-14,737	\$135,262-176,842	05
YA74	Pr Limnologist	058	\$ 58.43- 76.34	\$10,128-13,232	\$121,534-158,787	02
YA79	Pr Microbiologist	058	\$ 58.43- 76.34	\$10,128-13,232	\$121,534-158,787	02
YA105	Pr Project Controls Specialist	056	\$ 55.38- 72.44	\$ 9,599-12,556	\$115,190-150,675	02
289	* Pr Public Affairs Rep	058	\$ 58.43- 76.34	\$10,128-13,232	\$121,534-158,787	04
275	* Pr Real Estate Rep	053	\$ 51.01- 66.83	\$ 8,842-11,584	\$106,101-139,006	04
YC54	* Pr Recruitment Specialist (C)	056	\$ 55.38- 72.44	\$ 9,599-12,556	\$115,190-150,675	05
933	* Pr Resource Specialist	063	\$ 66.83- 87.36	\$11,584-15,142	\$139,006-181,709	04
223	* Pr Systems Analyst	054	\$ 52.43- 68.60	\$ 9,088-11,891	\$109,054-142,688	04
YC17	* Pr Training Administrator (C)	056	\$ 55.38- 72.44	\$ 9,599-12,556	\$115,190-150,675	05
YC10	* Pr Training Specialist (C)	056	\$ 55.38- 72.44	\$ 9,599-12,556	\$115,190-150,675	05
YA103	Pr Water Quality Specialist	058	\$ 58.43- 76.34	\$10,128-13,232	\$121,534-158,787	02
S01	Pre-Apprentice	017	\$ 18.98- 24.92	\$ 3,290- 4,319	\$ 39,478- 51,834	02
PM031	* Prgrm Mgr-Audit	065	\$ 70.43- 92.11	\$12,208-15,966	\$146,494-191,589	04
PM021	* Prgrm Mgr-Bay-Delta Initiative	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	04
PM002	* Prgrm Mgr-Business Continuity	060	\$ 61.66- 80.58	\$10,688-13,967	\$128,253-167,606	04
PM027	* Prgrm Mgr-Business Outreach	060	\$ 61.66- 80.58	\$10,688-13,967	\$128,253-167,606	04
PMA02	* Prgrm Mgr-Community Relations	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	05
PM004	* Prgrm Mgr-Corporate Resources	060	\$ 61.66- 80.58	\$10,688-13,967	\$128,253-167,606	04
PM029	* Prgrm Mgr-Creative Design	063	\$ 66.83- 87.36	\$11,584-15,142	\$139,006-181,709	04
PM005	* Prgrm Mgr-Dam Safety Initiativs	071	\$ 82.75-108.38	\$14,343-18,786	\$172,120-225,430	04
PM006	* Prgrm Mgr-Emergency Management	063	\$ 66.83- 87.36	\$11,584-15,142	\$139,006-181,709	04
PM026	* Prgrm Mgr-Engineering	067	\$ 74.36- 97.22	\$12,889-16,851	\$154,669-202,218	04
PM001	* Prgrm Mgr-Finance	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	04
PM007	* Prgrm Mgr-Fleet	060	\$ 61.66- 80.58	\$10,688-13,967	\$128,253-167,606	04
PM009	* Prgrm Mgr-Info Technology	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	04
PM013	* Prgrm Mgr-Power Sched&Trading	060	\$ 61.66- 80.58	\$10,688-13,967	\$128,253-167,606	04
PM014	* Prgrm Mgr-Press Office	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	04
PM022	* Prgrm Mgr-Real Property	060	\$ 61.66- 80.58	\$10,688-13,967	\$128,253-167,606	04
PM015	* Prgrm Mgr-Regnl Recycled Water	071	\$ 82.75-108.38	\$14,343-18,786	\$172,120-225,430	04
PM023	* Prgrm Mgr-Safety&RegCompliance	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	04
PM017	* Prgrm Mgr-Water Resource	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	04
PM019	* Prgrm Mgr-Web	063	\$ 66.83- 87.36	\$11,584-15,142	\$139,006-181,709	04
XA50	Production Planner	048	\$ 44.43- 58.43	\$ 7,701-10,128	\$ 92,414-121,534	02
Z13D	* Program Manager I	068	\$ 59.00- 80.58	\$10,227-13,967	\$122,720-167,606	01
Z13E	* Program Manager II	071	\$ 63.91- 87.36	\$11,078-15,142	\$132,933-181,709	01
Z13F	* Program Manager III	074	\$ 69.31- 94.56	\$12,014-16,390	\$144,165-196,685	01
YA85	Project Controls Specialist	045	\$ 40.93- 53.90	\$ 7,095- 9,343	\$ 85,134-112,112	02
TA23	Property Maintenance Tech	041	\$ 36.65- 48.22	\$ 6,353- 8,358	\$ 76,232-100,298	02
YA87	Public Affairs Rep I	038	\$ 33.78- 44.43	\$ 5,855- 7,701	\$ 70,262- 92,414	02
YA88	Public Affairs Rep II	043	\$ 38.75- 51.01	\$ 6,717- 8,842	\$ 80,600-106,101	02
TA21	Pump Plant Maint Operator I	032	\$ 28.65- 37.68	\$ 4,966- 6,531	\$ 59,592- 78,374	02

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SALARY SCHEDULE

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Classification Code	Title	Salary Grade	Hourly Range	Monthly Range	Annual Range	Unit Code
TA22	Pump Plant Maint Operator II	036	\$ 32.02- 42.04	\$ 5,550- 7,287	\$ 66,602- 87,443	02
T01	Pump Plant Specialist	048	\$ 44.43- 58.43	\$ 7,701-10,128	\$ 92,414-121,534	02
YA90	Quality Assurance Officer	056	\$ 55.38- 72.44	\$ 9,599-12,556	\$115,190-150,675	02
YA91	Real Estate Representative I	037	\$ 32.85- 43.24	\$ 5,694- 7,495	\$ 68,328- 89,939	02
YA92	Real Estate Representative II	042	\$ 37.68- 49.64	\$ 6,531- 8,604	\$ 78,374-103,251	02
YA93	Real Estate Representative III	046	\$ 42.04- 55.38	\$ 7,287- 9,599	\$ 87,443-115,190	02
UA12	Reprographics Technician I	023	\$ 22.35- 29.42	\$ 3,874- 5,099	\$ 46,488- 61,194	02
UA13	Reprographics Technician II	028	\$ 25.60- 33.78	\$ 4,437- 5,855	\$ 53,248- 70,262	02
UA14	Reprographics Technician III	031	\$ 27.84- 36.65	\$ 4,826- 6,353	\$ 57,907- 76,232	02
YA98	Resource Specialist	055	\$ 53.90- 70.43	\$ 9,343-12,208	\$112,112-146,494	02
Z03B	* Section Manager I (C)	067	\$ 74.36- 97.22	\$12,889-16,851	\$154,669-202,218	05
Z03C	* Section Manager II (C)	069	\$ 78.43-102.64	\$13,595-17,791	\$163,134-213,491	05
SM005	* Section Mgr-Business Outreach	068	\$ 76.34- 99.89	\$13,232-17,314	\$158,787-207,771	04
SM014	* Section Mgr-Conveyance&Distrbn	073	\$ 87.36-114.42	\$15,142-19,833	\$181,709-237,994	04
SM002	* Section Mgr-CustomersComm Svcs	068	\$ 76.34- 99.89	\$13,232-17,314	\$158,787-207,771	04
SM015	* Section Mgr-Engineering Svcs	073	\$ 87.36-114.42	\$15,142-19,833	\$181,709-237,994	04
SM009	* Section Mgr-Environ Planning	072	\$ 85.02-111.35	\$14,737-19,301	\$176,842-231,608	04
SM003	* Section Mgr-Legislative Svcs	068	\$ 76.34- 99.89	\$13,232-17,314	\$158,787-207,771	04
SM004	* Section Mgr-Media Services	068	\$ 76.34- 99.89	\$13,232-17,314	\$158,787-207,771	04
SM006	* Section Mgr-MembrSvc&PubOutrch	068	\$ 76.34- 99.89	\$13,232-17,314	\$158,787-207,771	04
SM010	* Section Mgr-Ops Safety&Reg Srv	072	\$ 85.02-111.35	\$14,737-19,301	\$176,842-231,608	04
SM011	* Section Mgr-Ops Support Svcs	072	\$ 85.02-111.35	\$14,737-19,301	\$176,842-231,608	04
SM012	* Section Mgr-Power Ops&Planning	072	\$ 85.02-111.35	\$14,737-19,301	\$176,842-231,608	04
SM018	* Section Mgr-Real Property	071	\$ 82.75-108.38	\$14,343-18,786	\$172,120-225,430	04
SM007	* Section Mgr-Rev, Rates &Budget	068	\$ 76.34- 99.89	\$13,232-17,314	\$158,787-207,771	04
SM019	* Section Mgr-Revenue & Budget	072	\$ 85.02-111.35	\$14,737-19,301	\$176,842-231,608	04
SM013	* Section Mgr-Water Ops&Planning	072	\$ 85.02-111.35	\$14,737-19,301	\$176,842-231,608	04
SM016	* Section Mgr-Water Quality	073	\$ 87.36-114.42	\$15,142-19,833	\$181,709-237,994	04
SM008	* Section Mgr-Water Resource Mgt	072	\$ 85.02-111.35	\$14,737-19,301	\$176,842-231,608	04
SM017	* Section Mgr-Water Treatment	073	\$ 87.36-114.42	\$15,142-19,833	\$181,709-237,994	04
WC01	Security Specialist (C)	051	\$ 48.22- 63.35	\$ 8,358-10,981	\$100,298-131,768	05
Z16A	* Special Projects Manager	072	\$ 85.02-111.35	\$14,737-19,301	\$176,842-231,608	05
YA02	Sr Accountant	045	\$ 40.93- 53.90	\$ 7,095- 9,343	\$ 85,134-112,112	02
VA03	Sr Accounting Tech	039	\$ 34.72- 45.65	\$ 6,018- 7,913	\$ 72,218- 94,952	02
YA05	Sr Admin Analyst	049	\$ 45.65- 60.05	\$ 7,913-10,409	\$ 94,952-124,904	02
YC04	* Sr Admin Analyst (C)	049	\$ 45.65- 60.05	\$ 7,913-10,409	\$ 94,952-124,904	05
Y01	* Sr Architect	059	\$ 60.05- 78.43	\$10,409-13,595	\$124,904-163,134	04
YC43	* Sr Benefits Analyst (C)	049	\$ 45.65- 60.05	\$ 7,913-10,409	\$ 94,952-124,904	05
YA10	Sr Biologist	053	\$ 51.01- 66.83	\$ 8,842-11,584	\$106,101-139,006	02
YC07	* Sr Board Specialist (C)	050	\$ 46.97- 61.66	\$ 8,141-10,688	\$ 97,698-128,253	05
YA14	Sr Buyer	048	\$ 44.43- 58.43	\$ 7,701-10,128	\$ 92,414-121,534	02
YA18	Sr Chemist	053	\$ 51.01- 66.83	\$ 8,842-11,584	\$106,101-139,006	02
YC49	* Sr Class & Comp Analyst (C)	049	\$ 45.65- 60.05	\$ 7,913-10,409	\$ 94,952-124,904	05
XA08	Sr Crane Certification Tech	048	\$ 44.43- 58.43	\$ 7,701-10,128	\$ 92,414-121,534	02
XA10	Sr Cross Connection Tech	048	\$ 44.43- 58.43	\$ 7,701-10,128	\$ 92,414-121,534	02
Z11	* Sr Dep Gen Counsel Lbr Reltns	079	\$ 79.29-108.38	\$13,744-18,786	\$164,923-225,430	01
YA23	Sr Deputy Auditor	052	\$ 49.64- 65.03	\$ 8,604-11,272	\$103,251-135,262	02
XA14	Sr Designer	043	\$ 38.75- 51.01	\$ 6,717- 8,842	\$ 80,600-106,101	02
YC20	* Sr Dpty General Counsel (C)	071	\$ 82.75-108.38	\$14,343-18,786	\$172,120-225,430	05
YC47	* Sr EEO Analyst (C)	049	\$ 45.65- 60.05	\$ 7,913-10,409	\$ 94,952-124,904	05
YC28	* Sr EHS Field Specialist (C)	053	\$ 51.01- 66.83	\$ 8,842-11,584	\$106,101-139,006	05
YC41	* Sr Emp Relations Specialist	054	\$ 52.43- 68.60	\$ 9,088-11,891	\$109,054-142,688	05
114	* Sr Engineer	060	\$ 61.66- 80.58	\$10,688-13,967	\$128,253-167,606	04
XA23A	Sr Engineering Technician	053	\$ 51.01- 66.83	\$ 8,842-11,584	\$106,101-139,006	02
924	* Sr Environmental Specialist	059	\$ 60.05- 78.43	\$10,409-13,595	\$124,904-163,134	03
YC04A	* Sr Financial Analyst (C)	051	\$ 48.22- 63.35	\$ 8,358-10,981	\$100,298-131,768	05
YC23	* Sr Government&Region AffRep(C)	057	\$ 56.89- 74.36	\$ 9,861-12,889	\$118,331-154,669	05
YC51	* Sr HR Training Specialist (C)	048	\$ 44.43- 58.43	\$ 7,701-10,128	\$ 92,414-121,534	05
YC45	* Sr HRIS Analyst (C)	049	\$ 45.65- 60.05	\$ 7,913-10,409	\$ 94,952-124,904	05
YA109	Sr IT Business Analyst	052	\$ 49.64- 65.03	\$ 8,604-11,272	\$103,251-135,262	02
XA30A	Sr IT Communication Technician	050	\$ 46.97- 61.66	\$ 8,141-10,688	\$ 97,698-128,253	02
YA41	Sr IT Enterprise App Analyst	052	\$ 49.64- 65.03	\$ 8,604-11,272	\$103,251-135,262	02
YA36	Sr IT GIS Analyst	052	\$ 49.64- 65.03	\$ 8,604-11,272	\$103,251-135,262	02
YA45	Sr IT Infrastructure Adminstr	052	\$ 49.64- 65.03	\$ 8,604-11,272	\$103,251-135,262	02
YA49	Sr IT Network Engineer	053	\$ 51.01- 66.83	\$ 8,842-11,584	\$106,101-139,006	02
YA53	Sr IT Proj Controls Specialist	049	\$ 45.65- 60.05	\$ 7,913-10,409	\$ 94,952-124,904	02
YA57	Sr IT Quality Analyst	052	\$ 49.64- 65.03	\$ 8,604-11,272	\$103,251-135,262	02
YA61	Sr IT Software Developer	052	\$ 49.64- 65.03	\$ 8,604-11,272	\$103,251-135,262	02
XA34A	Sr IT Support Analyst	051	\$ 48.22- 63.35	\$ 8,358-10,981	\$100,298-131,768	02
YA65	Sr IT System Administrator	052	\$ 49.64- 65.03	\$ 8,604-11,272	\$103,251-135,262	02

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201	* Sr Info Systems Auditor	055	\$ 53.90- 70.43	\$ 9,343-12,208	\$112,112-146,494	04
YC14	* Sr Info Tech Analyst (C)	052	\$ 49.64- 65.03	\$ 8,604-11,272	\$103,251-135,262	05
XA37A	Sr Lab Info Systems Specialist	053	\$ 51.01- 66.83	\$ 8,842-11,584	\$106,101-139,006	02
XA44A	Sr Landscape Maintenance Tech	048	\$ 44.43- 58.43	\$ 7,701-10,128	\$ 92,414-121,534	02
YA68	Sr Legal Analyst	049	\$ 45.65- 60.05	\$ 7,913-10,409	\$ 94,952-124,904	02
UC03	Sr Legal Secretary (C)	040	\$ 35.67- 46.97	\$ 6,183- 8,141	\$ 74,194- 97,698	05
YA73	Sr Limnologist	053	\$ 51.01- 66.83	\$ 8,842-11,584	\$106,101-139,006	02
YA78	Sr Microbiologist	053	\$ 51.01- 66.83	\$ 8,842-11,584	\$106,101-139,006	02
928	* Sr Occup Safety & Health Spec	058	\$ 58.43- 76.34	\$10,128-13,232	\$121,534-158,787	04
XA49	Sr Planner Scheduler	048	\$ 44.43- 58.43	\$ 7,701-10,128	\$ 92,414-121,534	02
YA86	Sr Project Controls Specialist	050	\$ 46.97- 61.66	\$ 8,141-10,688	\$ 97,698-128,253	02
YA89	Sr Public Affairs Rep	048	\$ 44.43- 58.43	\$ 7,701-10,128	\$ 92,414-121,534	02
YA94	Sr Real Estate Representative	050	\$ 46.97- 61.66	\$ 8,141-10,688	\$ 97,698-128,253	02
YC53	* Sr Recruitment Specialist (C)	049	\$ 45.65- 60.05	\$ 7,913-10,409	\$ 94,952-124,904	05
UA15	Sr Reprographic Technician	034	\$ 30.27- 39.81	\$ 5,247- 6,900	\$ 62,962- 82,805	02
155	* Sr Research Chemist	058	\$ 58.43- 76.34	\$10,128-13,232	\$121,534-158,787	03
932	* Sr Resource Specialist	059	\$ 60.05- 78.43	\$10,409-13,595	\$121,534-158,787	03
XA56	Sr System Operations Tech	053	\$ 51.01- 66.83	\$ 8,842-11,584	\$106,101-139,006	02
TA17	Sr System Operator	048	\$ 44.43- 58.43	\$ 7,701-10,128	\$ 92,414-121,534	02
XA62A	Sr Technical Writer	053	\$ 51.01- 66.83	\$ 8,842-11,584	\$106,101-139,006	02
YC16	* Sr Training Administrator (C)	051	\$ 48.22- 63.35	\$ 8,358-10,981	\$100,298-131,768	05
YC09	* Sr Training Specialist (C)	050	\$ 46.97- 61.66	\$ 8,141-10,688	\$ 97,698-128,253	05
YA102	Sr Water Quality Specialist	053	\$ 51.01- 66.83	\$ 8,842-11,584	\$106,101-139,006	02
XA69	Sr Water Quality Technician	048	\$ 44.43- 58.43	\$ 7,701-10,128	\$ 92,414-121,534	02
V01	* Staff Assistant to the GM	072	\$ 65.64- 89.70	\$11,378-15,548	\$136,531-186,576	01
Z43	* Staffing Manager	062	\$ 65.03- 85.02	\$11,272-14,737	\$135,262-176,842	05
VA12	Storekeeper I	026	\$ 24.27- 32.02	\$ 4,207- 5,550	\$ 50,482- 66,602	02
VA13	Storekeeper II	031	\$ 27.84- 36.65	\$ 4,826- 6,353	\$ 57,907- 76,232	02
VA14	Storekeeper III	035	\$ 31.16- 40.93	\$ 5,401- 7,095	\$ 64,813- 85,134	02
Y19	* Strategic Comm&Policy Advisor	081	\$ 83.74-114.42	\$14,515-19,833	\$174,179-237,994	01
PMA01	* Strategic Program Mgr, HR	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	05
Y13	Student Intern	016	\$ 14.24- 19.48	\$ 2,468- 3,377	\$ 29,619- 40,518	01
S04	Student Intern Desert	010	\$ 15.65- 20.56	\$ 2,713- 3,564	\$ 32,552- 42,765	02
UA18	Student Youth Intern	014	\$ 13.51- 18.45	\$ 2,342- 3,198	\$ 28,101- 38,376	01
260	* Supervising Admin Analyst	049	\$ 45.65- 60.05	\$ 7,913-10,409	\$ 94,952-124,904	03
XA51A	Survey and Mapping Tech I	036	\$ 32.02- 42.04	\$ 5,550- 7,287	\$ 66,602- 87,443	02
XA52A	Survey and Mapping Tech II	040	\$ 35.67- 46.97	\$ 6,183- 8,141	\$ 74,194- 97,698	02
XA53A	Survey and Mapping Tech III	048	\$ 44.43- 58.43	\$ 7,701-10,128	\$ 92,414-121,534	02
XA54A	Survey and Mapping Tech IV	053	\$ 51.01- 66.83	\$ 8,842-11,584	\$106,101-139,006	02
XA55	System Operations Technician	048	\$ 44.43- 58.43	\$ 7,701-10,128	\$ 92,414-121,534	02
TA16	System Operator	045	\$ 40.93- 53.90	\$ 7,095- 9,343	\$ 85,134-112,112	02
Z06A	* Team Manager I	055	\$ 53.90- 70.43	\$ 9,343-12,208	\$112,112-146,494	03
Z06B	* Team Manager II	056	\$ 55.38- 72.44	\$ 9,599-12,556	\$115,190-150,675	03
Z06C	* Team Manager III	058	\$ 58.43- 76.34	\$10,128-13,232	\$121,534-158,787	03
Z06D	* Team Manager IV	059	\$ 60.05- 78.43	\$10,409-13,595	\$124,904-163,134	03
Z06R	* Team Manager IV (C)	058	\$ 58.43- 76.34	\$10,128-13,232	\$121,534-158,787	05
Z06E	* Team Manager V	060	\$ 61.66- 80.58	\$10,688-13,967	\$128,253-167,606	03
Z06S	* Team Manager V (C)	060	\$ 61.66- 80.58	\$10,688-13,967	\$128,253-167,606	05
Z06F	* Team Manager VI	064	\$ 68.60- 89.70	\$11,891-15,548	\$142,688-186,576	03
Z06G	* Team Manager VII	065	\$ 70.43- 92.11	\$12,208-15,966	\$146,494-191,589	03
TM001	* Team Mgr-Admin Svcs Bus Mgmt	059	\$ 60.05- 78.43	\$10,409-13,595	\$124,904-163,134	04
TM080	* Team Mgr-Budget	062	\$ 65.03- 85.02	\$11,272-14,737	\$135,262-176,842	04
TM002	* Team Mgr-Business Applications	063	\$ 66.83- 87.36	\$11,584-15,142	\$139,006-181,709	04
TM061	* Team Mgr-Business Intel System	062	\$ 65.03- 85.02	\$11,272-14,737	\$135,262-176,842	04
TM003	* Team Mgr-Chemistry	064	\$ 68.60- 89.70	\$11,891-15,548	\$142,688-186,576	04
TM079	* Team Mgr-Community Relations	063	\$ 66.83- 87.36	\$11,584-15,142	\$139,006-181,709	04
TM005	* Team Mgr-Construction Mgmt I	060	\$ 61.66- 80.58	\$10,688-13,967	\$128,253-167,606	04
TM004	* Team Mgr-Construction Mgmt II	065	\$ 70.43- 92.11	\$12,208-15,966	\$146,494-191,589	04
TM064	* Team Mgr-ConstructionContracts	065	\$ 70.43- 92.11	\$12,208-15,966	\$146,494-191,589	04
TM006	* Team Mgr-Control Systems Apps	064	\$ 68.60- 89.70	\$11,891-15,548	\$142,688-186,576	04
TM007	* Team Mgr-Corrosion Control	064	\$ 68.60- 89.70	\$11,891-15,548	\$142,688-186,576	04
TM078	* Team Mgr-Creative Design	063	\$ 66.83- 87.36	\$11,584-15,142	\$139,006-181,709	04
TM008	* Team Mgr-Database	063	\$ 66.83- 87.36	\$11,584-15,142	\$139,006-181,709	04
TM009	* Team Mgr-Design	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	04
TM073	* Team Mgr-Design Support	057	\$ 56.89- 74.36	\$ 9,861-12,889	\$118,331-154,669	04
TM072	* Team Mgr-Design Technology	059	\$ 60.05- 78.43	\$10,409-13,595	\$124,904-163,134	04
TM013	* Team Mgr-Eng Compliance	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	04
TM012	* Team Mgr-Engineering Administr	064	\$ 68.60- 89.70	\$11,891-15,548	\$142,688-186,576	04
TM014	* Team Mgr-Enterprise Apps	063	\$ 66.83- 87.36	\$11,584-15,142	\$139,006-181,709	04
TM022	* Team Mgr-Enterprise GIS & CAD	062	\$ 65.03- 85.02	\$11,272-14,737	\$135,262-176,842	04

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TM015	* Team Mgr-EnterprsWaterSysPrgrm	065	\$ 70.43- 92.11	\$12,208-15,966	\$146,494-191,589	04
TM065	* Team Mgr-Environ Planning	065	\$ 70.43- 92.11	\$12,208-15,966	\$146,494-191,589	04
TM016	* Team Mgr-Environ Prgrm Support	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	04
TM011	* Team Mgr-Ext Affairs Bus Mgmt	059	\$ 60.05- 78.43	\$10,409-13,595	\$124,904-163,134	04
TM019	* Team Mgr-Facility Operations	059	\$ 60.05- 78.43	\$10,409-13,595	\$124,904-163,134	04
TM018	* Team Mgr-Facility Planning	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	04
TM020	* Team Mgr-Field Survey	065	\$ 70.43- 92.11	\$12,208-15,966	\$146,494-191,589	04
TM033	* Team Mgr-FinanceRpt&PlantAsset	059	\$ 60.05- 78.43	\$10,409-13,595	\$124,904-163,134	04
TM021	* Team Mgr-Geodetics and Mapping	065	\$ 70.43- 92.11	\$12,208-15,966	\$146,494-191,589	04
TM023	* Team Mgr-Graphic Design	058	\$ 58.43- 76.34	\$10,128-13,232	\$121,534-158,787	04
TMA01	* Team Mgr-HR Business Support	058	\$ 58.43- 76.34	\$10,128-13,232	\$121,534-158,787	05
TM024	* Team Mgr-Health&SafetyPrgrmSup	064	\$ 68.60- 89.70	\$11,891-15,548	\$142,688-186,576	04
TM025	* Team Mgr-Hydraulics&SysMdlng	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	04
TM026	* Team Mgr-Hydroelectric	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	04
TM027	* Team Mgr-IT Administration	062	\$ 65.03- 85.02	\$11,272-14,737	\$135,262-176,842	04
TM074	* Team Mgr-IT Business Analysis	061	\$ 63.35- 82.75	\$10,981-14,343	\$131,768-172,120	04
TM077	* Team Mgr-IT Client Systems Spt	060	\$ 61.66- 80.58	\$10,688-13,967	\$128,253-167,606	04
TM066	* Team Mgr-IT Prgrm Project Sppt	065	\$ 70.43- 92.11	\$12,208-15,966	\$146,494-191,589	04
TM028	* Team Mgr-IT Quality Assurance	061	\$ 63.35- 82.75	\$10,981-14,343	\$131,768-172,120	04
TM010	* Team Mgr-IT Service Desk	060	\$ 61.66- 80.58	\$10,688-13,967	\$128,253-167,606	04
TM067	* Team Mgr-Info Security	061	\$ 63.35- 82.75	\$10,981-14,343	\$131,768-172,120	04
TM046	* Team Mgr-InternalCntr&WaterInv	059	\$ 60.05- 78.43	\$10,409-13,595	\$124,904-163,134	04
TM029	* Team Mgr-Inventory Control	056	\$ 55.38- 72.44	\$ 9,599-12,556	\$115,190-150,675	04
TM075	* Team Mgr-Laboratory Support	056	\$ 55.38- 72.44	\$ 9,599-12,556	\$115,190-150,675	03
TM068	* Team Mgr-LandPlanning&Managemt	063	\$ 66.83- 87.36	\$11,584-15,142	\$139,006-181,709	04
TM031	* Team Mgr-Maint Engineering	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	04
TM032	* Team Mgr-Materials&Metallurgy	060	\$ 61.66- 80.58	\$10,688-13,967	\$128,253-167,606	04
TM034	* Team Mgr-Microbiology	064	\$ 68.60- 89.70	\$11,891-15,548	\$142,688-186,576	04
TM035	* Team Mgr-Operations App Svcs	063	\$ 66.83- 87.36	\$11,584-15,142	\$139,006-181,709	04
TM036	* Team Mgr-Operations Compliance	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	04
TM076	* Team Mgr-Operations Planning	064	\$ 68.60- 89.70	\$11,891-15,548	\$142,688-186,576	04
TM037	* Team Mgr-Ops Control Center	064	\$ 68.60- 89.70	\$11,891-15,548	\$142,688-186,576	04
TM060	* Team Mgr-Power Ops& Scheduling	064	\$ 68.60- 89.70	\$11,891-15,548	\$142,688-186,576	04
TM038	* Team Mgr-Procurement	059	\$ 60.05- 78.43	\$10,409-13,595	\$124,904-163,134	04
TM039	* Team Mgr-Prof Contracting Svcs	059	\$ 60.05- 78.43	\$10,409-13,595	\$124,904-163,134	04
TM040	* Team Mgr-Program Management	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	04
TM041	* Team Mgr-Project Support	060	\$ 61.66- 80.58	\$10,688-13,967	\$128,253-167,606	04
TM063	* Team Mgr-Property Management	063	\$ 66.83- 87.36	\$11,584-15,142	\$139,006-181,709	04
TM042	* Team Mgr-Pump Plant	061	\$ 63.35- 82.75	\$10,981-14,343	\$131,768-172,120	04
TM043	* Team Mgr-QltyAsrn&CompSampling	064	\$ 68.60- 89.70	\$11,891-15,548	\$142,688-186,576	04
TM044	* Team Mgr-Real Prop Bus Mgmt	059	\$ 60.05- 78.43	\$10,409-13,595	\$124,904-163,134	04
TM045	* Team Mgr-RecordsMgt&ImagingSvc	059	\$ 60.05- 78.43	\$10,409-13,595	\$124,904-163,134	04
TM030	* Team Mgr-Reservoir Management	064	\$ 68.60- 89.70	\$11,891-15,548	\$142,688-186,576	04
TM069	* Team Mgr-Resource Development	064	\$ 68.60- 89.70	\$11,891-15,548	\$142,688-186,576	04
TM070	* Team Mgr-Resource Planning	064	\$ 68.60- 89.70	\$11,891-15,548	\$142,688-186,576	04
TM062	* Team Mgr-Right of Way Acquistn	063	\$ 66.83- 87.36	\$11,584-15,142	\$139,006-181,709	04
TM047	* Team Mgr-Safety of Dams	065	\$ 70.43- 92.11	\$12,208-15,966	\$146,494-191,589	04
TM017	* Team Mgr-Safety&RegSvcSiteSupt	064	\$ 68.60- 89.70	\$11,891-15,548	\$142,688-186,576	04
TMA02	* Team Mgr-SafetyRegTechTraining	060	\$ 61.66- 80.58	\$10,688-13,967	\$128,253-167,606	05
TM048	* Team Mgr-Security Management	064	\$ 68.60- 89.70	\$11,891-15,548	\$142,688-186,576	04
TM049	* Team Mgr-Server Administration	064	\$ 68.60- 89.70	\$11,891-15,548	\$142,688-186,576	04
TM050	* Team Mgr-Substructures	064	\$ 68.60- 89.70	\$11,891-15,548	\$142,688-186,576	04
TM051	* Team Mgr-Supply Acquisition	064	\$ 68.60- 89.70	\$11,891-15,548	\$142,688-186,576	04
TM052	* Team Mgr-Technical Assistance	060	\$ 61.66- 80.58	\$10,688-13,967	\$128,253-167,606	04
TM053	* Team Mgr-Technical Control	065	\$ 70.43- 92.11	\$12,208-15,966	\$146,494-191,589	04
TM054	* Team Mgr-Technical Writing	058	\$ 58.43- 76.34	\$10,128-13,232	\$121,534-158,787	04
TM055	* Team Mgr-Telecommunications	064	\$ 68.60- 89.70	\$11,891-15,548	\$142,688-186,576	04
TM071	* Team Mgr-Treasury Operations	059	\$ 60.05- 78.43	\$10,409-13,595	\$124,904-163,134	04
TM058	* Team Mgr-WRM Business Mgmt	059	\$ 60.05- 78.43	\$10,409-13,595	\$124,904-163,134	04
TM059	* Team Mgr-WSO Business Mgmt	059	\$ 60.05- 78.43	\$10,409-13,595	\$124,904-163,134	04
TM056	* Team Mgr-Warehouse	056	\$ 55.38- 72.44	\$ 9,599-12,556	\$115,190-150,675	04
TM057	* Team Mgr-Water Efficiency	064	\$ 68.60- 89.70	\$11,891-15,548	\$142,688-186,576	04
XA57	Technical Illustrator I	038	\$ 33.78- 44.43	\$ 5,855- 7,701	\$ 70,262- 92,414	02
XA58	Technical Illustrator II	043	\$ 38.75- 51.01	\$ 6,717- 8,842	\$ 80,600-106,101	02
XA59A	Technical Writer I	038	\$ 33.78- 44.43	\$ 5,855- 7,701	\$ 70,262- 92,414	02
XA60A	Technical Writer II	043	\$ 38.75- 51.01	\$ 6,717- 8,842	\$ 80,600-106,101	02
XA61A	Technical Writer III	048	\$ 44.43- 58.43	\$ 7,701-10,128	\$ 92,414-121,534	02
YC55	* Training Administrator	045	\$ 40.93- 53.90	\$ 7,095- 9,343	\$ 85,134-112,112	05
VC10	Training Assistant I	030	\$ 27.12- 35.67	\$ 4,701- 6,183	\$ 56,410- 74,194	05
VC11	Training Assistant II	034	\$ 30.27- 39.81	\$ 5,247- 6,900	\$ 62,962- 82,805	05

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SALARY SCHEDULE

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Classification Code	Title	Salary Grade	Hourly Range	Monthly Range	Annual Range	Unit Code
VC12	Training Assistant III	038	\$ 33.78- 44.43	\$ 5,855- 7,701	\$ 70,262- 92,414	05
Y15	* Training Logistics Specialist	059	\$ 60.05- 78.43	\$10,409-13,595	\$124,904-163,134	03
YC08	* Training Specialist (C)	045	\$ 40.93- 53.90	\$ 7,095- 9,343	\$ 85,134-112,112	05
ASM01	* Treasurer	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	04
VA15	Treasury Administrator	039	\$ 34.72- 45.65	\$ 6,018- 7,913	\$ 72,218- 94,952	02
Z05E	* Unit Manager V	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	04
Z05J	* Unit Manager V (C)	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	05
UM001	* Unit Mgr-Accounting	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	04
UM002	* Unit Mgr-Application Services	067	\$ 74.36- 97.22	\$12,889-16,851	\$154,669-202,218	04
UM003	* Unit Mgr-Apprentice&TechTrain	064	\$ 68.60- 89.70	\$11,891-15,548	\$142,688-186,576	04
UM004	* Unit Mgr-Audit	065	\$ 70.43- 92.11	\$12,208-15,966	\$146,494-191,589	04
UMA01	* Unit Mgr-Benefits Services	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	05
UM031	* Unit Mgr-Budget	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	04
UM030	* Unit Mgr-Chemistry	068	\$ 76.34- 99.89	\$13,232-17,314	\$158,787-207,771	04
UMA02	* Unit Mgr-ClassComp&Recruitment	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	05
UM005	* Unit Mgr-Construction Services	068	\$ 76.34- 99.89	\$13,232-17,314	\$158,787-207,771	04
UM006	* Unit Mgr-Contracting Services	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	04
UM007	* Unit Mgr-Conveyance&Distribtn	068	\$ 76.34- 99.89	\$13,232-17,314	\$158,787-207,771	04
UM008	* Unit Mgr-Document Services	064	\$ 68.60- 89.70	\$11,891-15,548	\$142,688-186,576	04
UM009	* Unit Mgr-Education	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	04
UM010	* Unit Mgr-Engineering Services	069	\$ 78.43-102.64	\$13,595-17,791	\$163,134-213,491	04
UM038	* Unit Mgr-Environmental Plng	069	\$ 78.43-102.64	\$13,595-17,791	\$163,134-213,491	04
UM011	* Unit Mgr-Facility Management	067	\$ 74.36- 97.22	\$12,889-16,851	\$154,669-202,218	04
UM012	* Unit Mgr-Fleet Services	065	\$ 70.43- 92.11	\$12,208-15,966	\$146,494-191,589	04
UM016	* Unit Mgr-IT Infrastructure	068	\$ 76.34- 99.89	\$13,232-17,314	\$158,787-207,771	04
UM033	* Unit Mgr-IT Program Mgt Office	067	\$ 74.36- 97.22	\$12,889-16,851	\$154,669-202,218	04
UM017	* Unit Mgr-IT Project Planning	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	04
UM032	* Unit Mgr-IT Security	068	\$ 76.34- 99.89	\$13,232-17,314	\$158,787-207,771	04
UM013	* Unit Mgr-Implemnt Proj&Studies	068	\$ 76.34- 99.89	\$13,232-17,314	\$158,787-207,771	04
UM014	* Unit Mgr-Imported Supply	068	\$ 76.34- 99.89	\$13,232-17,314	\$158,787-207,771	04
UM015	* Unit Mgr-Info Security Svcs	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	04
UM037	* Unit Mgr-Laboratory Services	068	\$ 76.34- 99.89	\$13,232-17,314	\$158,787-207,771	04
UM023	* Unit Mgr-Land Management	067	\$ 74.36- 97.22	\$12,889-16,851	\$154,669-202,218	04
UM018	* Unit Mgr-Manufacturing Svcs	068	\$ 76.34- 99.89	\$13,232-17,314	\$158,787-207,771	04
UM029	* Unit Mgr-Microbiology	068	\$ 76.34- 99.89	\$13,232-17,314	\$158,787-207,771	04
UM019	* Unit Mgr-Ops Planning&Program	068	\$ 76.34- 99.89	\$13,232-17,314	\$158,787-207,771	04
UM036	* Unit Mgr-Ops Proj & Asset Mgmt	069	\$ 78.43-102.64	\$13,595-17,791	\$163,134-213,491	04
UM021	* Unit Mgr-Planning and Acquistn	067	\$ 74.36- 97.22	\$12,889-16,851	\$154,669-202,218	04
UM020	* Unit Mgr-Power&EquipReliability	068	\$ 76.34- 99.89	\$13,232-17,314	\$158,787-207,771	04
UM035	* Unit Mgr-Rates,Charges&FinPlan	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	04
UM039	* Unit Mgr-Reporting	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	04
UM024	* Unit Mgr-Risk Management	064	\$ 68.60- 89.70	\$11,891-15,548	\$142,688-186,576	04
UM034	* Unit Mgr-Security	068	\$ 76.34- 99.89	\$13,232-17,314	\$158,787-207,771	04
UM025	* Unit Mgr-System Analysis	069	\$ 78.43-102.64	\$13,595-17,791	\$163,134-213,491	04
UM026	* Unit Mgr-System Operations	068	\$ 76.34- 99.89	\$13,232-17,314	\$158,787-207,771	04
UM027	* Unit Mgr-Water Purification	068	\$ 76.34- 99.89	\$13,232-17,314	\$158,787-207,771	04
UM028	* Unit Mgr-Water Treatment Plant	068	\$ 76.34- 99.89	\$13,232-17,314	\$158,787-207,771	04
XA63	Videographer I	035	\$ 31.16- 40.93	\$ 5,401- 7,095	\$ 64,813- 85,134	02
XA64	Videographer II	041	\$ 36.65- 48.22	\$ 6,353- 8,358	\$ 76,232-100,298	02
YA101	Water Quality Specialist	048	\$ 44.43- 58.43	\$ 7,701-10,128	\$ 92,414-121,534	02
XA66	Water Quality Technician I	033	\$ 29.42- 38.75	\$ 5,099- 6,717	\$ 61,194- 80,600	02
XA67	Water Quality Technician II	038	\$ 33.78- 44.43	\$ 5,855- 7,701	\$ 70,262- 92,414	02
XA68	Water Quality Technician III	043	\$ 38.75- 51.01	\$ 6,717- 8,842	\$ 80,600-106,101	02
XA70A	Water Sampling Field Tech	033	\$ 29.42- 38.75	\$ 5,099- 6,717	\$ 61,194- 80,600	02
Z38	* Workers Compensation Manager	066	\$ 72.44- 94.56	\$12,556-16,390	\$150,675-196,685	05
T13	Wtr Treatment Plant Specialist	048	\$ 44.43- 58.43	\$ 7,701-10,128	\$ 92,414-121,534	02
TA18	Wtr Trtment Plant Operator I	035	\$ 31.16- 40.93	\$ 5,401- 7,095	\$ 64,813- 85,134	02
TA19	Wtr Trtment Plant Operator II	040	\$ 35.67- 46.97	\$ 6,183- 8,141	\$ 74,194- 97,698	02
TA20	Wtr Trtment Plant Operator III	045	\$ 40.93- 53.90	\$ 7,095- 9,343	\$ 85,134-112,112	02

Metropolitan Water District of Southern California
SALARY SCHEDULE

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Classification Code	Title	Salary Grade	Hourly Range	Monthly Range	Annual Range	Unit Code
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Unit Code

00 - Executive
 01 - Unrepresented
 02 - AFSCME Local 1902
 03 - Supervisors Association
 04 - Management&Professional Assoc
 05 - Assoc of Conf Employees

* Not Eligible for Overtime

O&M Tech Titles

+ O&M Tech I
 S03A (Grade 27): Carpenter, Coater, Equipment Operator, Fleet, Plumber, Welder-Fabricator
 S03 (Grade 28): Electrical, HVAC, Machinist, Mechanical
 S03P (Grade 28 - Apprentice): Electrical, Mechanical
 + O&M Tech II
 S02A (Grade 31): Carpenter, Coater, Equipment Operator, Fleet, Plumber, Welder-Fabricator
 S02 (Grade 32): Electrical, HVAC, Machinist, Mechanical
 S02P (Grade 32 - Apprentice): Electrical, Mechanical
 + O&M Tech III
 T10A (Grade 35): Carpenter, Coater, Equipment Operator, Fleet, Plumber, Welder-Fabricator
 T10 (Grade 36): Electrical, HVAC, Machinist, Mechanical
 T10P (Grade 36 - Apprentice): Electrical, Mechanical
 + O&M Tech IV
 T03A (Grade 41): Carpenter, Coater, Equipment Operator, Fleet, Plumber, Welder-Fabricator
 T03 (Grade 42): Electrical, HVAC, Machinist, Mechanical
 T03FS (Grade 42): Welder-Fabricator/Field Services

End of Report

Metropolitan Water District of Southern California

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SALARY SCHEDULE

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Classification Code	Title	Salary Grade	Hourly Range	Monthly Range	Annual Range	Unit Code
YA01	Accountant	038	\$ 34.79- 45.76	\$ 6,030- 7,932	\$ 72,363- 95,181	02
VA01	Accounting Tech I	029	\$ 27.16- 35.76	\$ 4,708- 6,198	\$ 56,493- 74,381	02
VA02	Accounting Tech II	034	\$ 31.18- 41.00	\$ 5,405- 7,107	\$ 64,854- 85,280	02
Z27	* Accounts Payable Administrator	053	\$ 52.54- 68.83	\$ 9,107-11,931	\$109,283-143,166	04
Z69	* Accounts Receivable Adminstr	053	\$ 52.54- 68.83	\$ 9,107-11,931	\$109,283-143,166	04
YA04	Admin Analyst	044	\$ 41.00- 54.00	\$ 7,107- 9,360	\$ 85,280-112,320	02
YC01	Admin Analyst I (C)	039	\$ 35.76- 47.02	\$ 6,198- 8,150	\$ 74,381- 97,802	05
YC02	Admin Analyst II (C)	042	\$ 38.81- 51.13	\$ 6,727- 8,863	\$ 80,725-106,350	05
YC03	* Admin Analyst III (C)	045	\$ 42.16- 55.52	\$ 7,308- 9,623	\$ 87,693-115,482	05
VA04	Admin Assistant I	031	\$ 28.68- 37.75	\$ 4,971- 6,543	\$ 59,654- 78,520	02
VC01	Admin Assistant I (C)	031	\$ 28.68- 37.75	\$ 4,971- 6,543	\$ 59,654- 78,520	05
VA05	Admin Assistant II	035	\$ 32.09- 42.16	\$ 5,562- 7,308	\$ 66,747- 87,693	02
VC02	Admin Assistant II (C)	035	\$ 32.09- 42.16	\$ 5,562- 7,308	\$ 66,747- 87,693	05
VA06	Admin Assistant III	039	\$ 35.76- 47.02	\$ 6,198- 8,150	\$ 74,381- 97,802	02
VC03	Admin Assistant III (C)	039	\$ 35.76- 47.02	\$ 6,198- 8,150	\$ 74,381- 97,802	05
UA04	Admin Secretary	037	\$ 33.84- 44.54	\$ 5,866- 7,720	\$ 70,387- 92,643	02
PM034	* Agricultural Liaison	060	\$ 63.51- 83.00	\$11,008-14,387	\$132,101-172,640	04
937	Aircraft Pilot	046	\$ 43.30- 57.04	\$ 7,505- 9,887	\$ 90,064-118,643	03
TA12	Aqueduct & Power Dispatcher	045	\$ 42.16- 55.52	\$ 7,308- 9,623	\$ 87,693-115,482	02
T11	Aqueduct Pump Specialist	046	\$ 43.30- 57.04	\$ 7,505- 9,887	\$ 90,064-118,643	02
YC62	* Assistant Ethics Officer	063	\$ 68.83- 89.98	\$11,931-15,597	\$143,166-187,158	05
YA08	Assoc Biologist	043	\$ 39.91- 52.54	\$ 6,918- 9,107	\$ 83,013-109,283	02
YA16	Assoc Chemist	043	\$ 39.91- 52.54	\$ 6,918- 9,107	\$ 83,013-109,283	02
YC18	* Assoc Dpty General Counsel (C)	060	\$ 63.51- 83.00	\$11,008-14,387	\$132,101-172,640	05
YA26	Assoc Engineer	050	\$ 48.38- 63.51	\$ 8,386-11,008	\$100,630-132,101	02
YA30	Assoc Environmental Specialist	048	\$ 45.76- 60.18	\$ 7,932-10,431	\$ 95,181-125,174	02
YA51	Assoc IT Proj Contr Specialist	039	\$ 35.76- 47.02	\$ 6,198- 8,150	\$ 74,381- 97,802	02
YA71	Assoc Limnologist	043	\$ 39.91- 52.54	\$ 6,918- 9,107	\$ 83,013-109,283	02
YA76	Assoc Microbiologist	043	\$ 39.91- 52.54	\$ 6,918- 9,107	\$ 83,013-109,283	02
YA84	Assoc Proj Controls Specialist	038	\$ 34.79- 45.76	\$ 6,030- 7,932	\$ 72,363- 95,181	02
YA97	Assoc Resource Specialist	049	\$ 47.02- 61.85	\$ 8,150-10,721	\$ 97,802-128,648	02
WC02	Assoc Security Specialist (C)	049	\$ 47.02- 61.85	\$ 8,150-10,721	\$ 97,802-128,648	05
YA100	Assoc Water Quality Specialist	043	\$ 39.91- 52.54	\$ 6,918- 9,107	\$ 83,013-109,283	02
YA07	Asst Biologist	038	\$ 34.79- 45.76	\$ 6,030- 7,932	\$ 72,363- 95,181	02
YC63	* Asst Board Administrator	056	\$ 57.04- 74.61	\$ 9,887-12,932	\$118,643-155,189	05
YA15	Asst Chemist	038	\$ 34.79- 45.76	\$ 6,030- 7,932	\$ 72,363- 95,181	02
YA24	Asst Engineer I	043	\$ 39.91- 52.54	\$ 6,918- 9,107	\$ 83,013-109,283	02
YA25	Asst Engineer II	046	\$ 43.30- 57.04	\$ 7,505- 9,887	\$ 90,064-118,643	02
YA28	Asst Env Specialist I	038	\$ 34.79- 45.76	\$ 6,030- 7,932	\$ 72,363- 95,181	02
YA29	Asst Env Specialist II	043	\$ 39.91- 52.54	\$ 6,918- 9,107	\$ 83,013-109,283	02
Z12	* Asst GM Strategic Wtr Initiativ	093	\$119.44-163.17	\$20,703-28,283	\$248,435-339,394	01
985	* Asst General Auditor	081	\$ 86.25-117.85	\$14,950-20,427	\$179,400-245,128	01
032	* Asst General Counsel	086	\$ 98.77-134.92	\$17,120-23,386	\$205,442-280,634	01
Z55	* Asst General Counsel (C)	078	\$102.89-134.92	\$17,834-23,386	\$214,011-280,634	05
024	* Asst General Manager/CAO	093	\$119.44-163.17	\$20,703-28,283	\$248,435-339,394	01
Z14	* Asst General Manager/CEAO	093	\$119.44-163.17	\$20,703-28,283	\$248,435-339,394	01
006	* Asst General Manager/CFO	093	\$119.44-163.17	\$20,703-28,283	\$248,435-339,394	01
002	* Asst General Manager/COO	094	\$122.68-167.68	\$21,265-29,065	\$255,174-348,774	01
Z02	* Asst Group Manager	085	\$ 96.13-131.31	\$16,663-22,760	\$199,950-273,125	01
YA50	Asst IT Proj Contrl Specialist	033	\$ 30.30- 39.91	\$ 5,252- 6,918	\$ 63,024- 83,013	02
YA70	Asst Limnologist	038	\$ 34.79- 45.76	\$ 6,030- 7,932	\$ 72,363- 95,181	02
YA75	Asst Microbiologist	038	\$ 34.79- 45.76	\$ 6,030- 7,932	\$ 72,363- 95,181	02
YA83	Asst Proj Controls Specialist	033	\$ 30.30- 39.91	\$ 5,252- 6,918	\$ 63,024- 83,013	02
YA95	Asst Resource Specialist I	042	\$ 38.81- 51.13	\$ 6,727- 8,863	\$ 80,725-106,350	02
YA96	Asst Resource Specialist II	045	\$ 42.16- 55.52	\$ 7,308- 9,623	\$ 87,693-115,482	02
Z04C	* Asst Section Manager II (C)	067	\$ 76.59-100.14	\$13,276-17,358	\$159,307-208,291	05
TA15	Asst System Operator	041	\$ 37.75- 49.67	\$ 6,543- 8,609	\$ 78,520-103,314	02
295	* Asst Treasurer	057	\$ 58.60- 76.59	\$10,157-13,276	\$121,888-159,307	04
Z52	* Asst Unit Mgr-Conveyance&Distr	064	\$ 70.66- 92.39	\$12,248-16,014	\$146,973-192,171	04
YA99	Asst Water Quality Specialist	038	\$ 34.79- 45.76	\$ 6,030- 7,932	\$ 72,363- 95,181	02
Z32	* Audit Administrator	073	\$ 69.47- 94.87	\$12,041-16,444	\$144,498-197,330	01
Z29	* Bay-Delta Initiatives Manager	086	\$ 98.77-134.92	\$17,120-23,386	\$205,442-280,634	01
Z68	* Bay-Delta InitiativesPolicyMgr	085	\$ 96.13-131.31	\$16,663-22,760	\$199,950-273,125	01
YA09	Biologist	048	\$ 45.76- 60.18	\$ 7,932-10,431	\$ 95,181-125,174	02
Z64	* Board Administrator	072	\$ 67.61- 92.39	\$11,719-16,014	\$140,629-192,171	01
U04	* Board Executive Secretary	066	\$ 57.67- 78.63	\$ 9,996-13,629	\$119,954-163,550	01
YC06	* Board Specialist (C)	045	\$ 42.16- 55.52	\$ 7,308- 9,623	\$ 87,693-115,482	05
Z65	* Budget and Treasury Manager	081	\$ 86.25-117.85	\$14,950-20,427	\$179,400-245,128	01
Z09	* Business Outreach Manager	060	\$ 63.51- 83.00	\$11,008-14,387	\$132,101-172,640	04
YA12	Buyer I	038	\$ 34.79- 45.76	\$ 6,030- 7,932	\$ 72,363- 95,181	02

Metropolitan Water District of Southern California

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SALARY SCHEDULE

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Classification Code	Title	Salary Grade	Hourly Range	Monthly Range	Annual Range	Unit Code
YA13	Buyer II	043	\$ 39.91- 52.54	\$ 6,918- 9,107	\$ 83,013-109,283	02
YA17	Chemist	048	\$ 45.76- 60.18	\$ 7,932-10,431	\$ 95,181-125,174	02
SA06	Chief Cook	024	\$ 23.62- 31.18	\$ 4,094- 5,405	\$ 49,130- 64,854	02
Y08	* Chief Deputy General Counsel	085	\$ 96.13-131.31	\$16,663-22,760	\$199,950-273,125	01
YC21	* Chief Dpty General Counsel (C)	074	\$ 92.39-121.05	\$16,014-20,982	\$192,171-251,784	05
XA47	Chief Photographer	048	\$ 45.76- 60.18	\$ 7,932-10,431	\$ 95,181-125,174	02
XA65	Chief Videographer	048	\$ 45.76- 60.18	\$ 7,932-10,431	\$ 95,181-125,174	02
122	Chief of Party	053	\$ 52.54- 68.83	\$ 9,107-11,931	\$109,283-143,166	03
Z42	* Class & Comp Manager	064	\$ 70.66- 92.39	\$12,248-16,014	\$146,973-192,171	05
SA04	Commercial Truck Driver A	037	\$ 33.84- 44.54	\$ 5,866- 7,720	\$ 70,387- 92,643	02
SA05A	Commercial Truck Driver B	037	\$ 33.84- 44.54	\$ 5,866- 7,720	\$ 70,387- 92,643	02
XA01A	Construction Inspector I	038	\$ 34.79- 45.76	\$ 6,030- 7,932	\$ 72,363- 95,181	02
XA02A	Construction Inspector II	043	\$ 39.91- 52.54	\$ 6,918- 9,107	\$ 83,013-109,283	02
XA03A	Construction Inspector III	048	\$ 45.76- 60.18	\$ 7,932-10,431	\$ 95,181-125,174	02
XA04A	Construction Inspector IV	053	\$ 52.54- 68.83	\$ 9,107-11,931	\$109,283-143,166	02
XA05A	Construction Inspector V	056	\$ 57.04- 74.61	\$ 9,887-12,932	\$118,643-155,189	02
Z36	* Controller	072	\$ 87.57-114.69	\$15,179-19,880	\$182,146-238,555	05
T04	Conveyance&Distrbtn Specialist	047	\$ 44.54- 58.60	\$ 7,720-10,157	\$ 92,643-121,888	02
XA06	Crane Certification Tech I	038	\$ 34.79- 45.76	\$ 6,030- 7,932	\$ 72,363- 95,181	02
XA07	Crane Certification Tech II	043	\$ 39.91- 52.54	\$ 6,918- 9,107	\$ 83,013-109,283	02
XA09	Cross Connection Technician	043	\$ 39.91- 52.54	\$ 6,918- 9,107	\$ 83,013-109,283	02
PM030	* Debt Management Specialist	060	\$ 63.51- 83.00	\$11,008-14,387	\$132,101-172,640	04
YA20	Deputy Auditor I	031	\$ 28.68- 37.75	\$ 4,971- 6,543	\$ 59,654- 78,520	02
YA21	Deputy Auditor II	036	\$ 32.98- 43.30	\$ 5,717- 7,505	\$ 68,598- 90,064	02
YA22	Deputy Auditor III	045	\$ 42.16- 55.52	\$ 7,308- 9,623	\$ 87,693-115,482	02
Z57	* Deputy General Auditor	077	\$ 77.36-105.72	\$13,409-18,325	\$160,909-219,898	01
YC19	* Deputy General Counsel (C)	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	05
VA07	Deputy Treasurer	048	\$ 45.76- 60.18	\$ 7,932-10,431	\$ 95,181-125,174	02
XA11	Designer I	032	\$ 29.51- 38.81	\$ 5,115- 6,727	\$ 61,381- 80,725	02
XA12	Designer II	035	\$ 32.09- 42.16	\$ 5,562- 7,308	\$ 66,747- 87,693	02
XA13	Designer III	039	\$ 35.76- 47.02	\$ 6,198- 8,150	\$ 74,381- 97,802	02
Z41	* Director of Info Tech Services	072	\$ 87.57-114.69	\$15,179-19,880	\$182,146-238,555	04
T14	Diver-Inland Commercial	047	\$ 44.54- 58.60	\$ 7,720-10,157	\$ 92,643-121,888	02
YC61	* DptyEthicsOfcr Adv,Comp&Policy	060	\$ 63.51- 83.00	\$11,008-14,387	\$132,101-172,640	05
YC60	* DptyEthicsOfcr Inv,Outrch&Educ	060	\$ 63.51- 83.00	\$11,008-14,387	\$132,101-172,640	05
Z25	* EEO Manager	068	\$ 78.63-102.89	\$13,629-17,834	\$163,550-214,011	05
YC25	EHS Field Specialist I (C)	043	\$ 39.91- 52.54	\$ 6,918- 9,107	\$ 83,013-109,283	05
YC26	EHS Field Specialist II (C)	045	\$ 42.16- 55.52	\$ 7,308- 9,623	\$ 87,693-115,482	05
YC27	EHS Field Specialist III (C)	050	\$ 48.38- 63.51	\$ 8,386-11,008	\$100,630-132,101	05
T12	Electrical Specialist	048	\$ 45.76- 60.18	\$ 7,932-10,431	\$ 95,181-125,174	02
168	* Electronic Tech Supervisor	055	\$ 55.52- 72.54	\$ 9,623-12,574	\$115,482-150,883	03
YC42	* Employee Relations Specialist	051	\$ 49.67- 65.25	\$ 8,609-11,310	\$103,314-135,720	05
YA27	Engineer	056	\$ 57.04- 74.61	\$ 9,887-12,932	\$118,643-155,189	02
XA20A	Engineering Tech I	038	\$ 34.79- 45.76	\$ 6,030- 7,932	\$ 72,363- 95,181	02
XA21A	Engineering Tech II	043	\$ 39.91- 52.54	\$ 6,918- 9,107	\$ 83,013-109,283	02
XA22A	Engineering Tech III	048	\$ 45.76- 60.18	\$ 7,932-10,431	\$ 95,181-125,174	02
YA31	Environmental Specialist	053	\$ 52.54- 68.83	\$ 9,107-11,931	\$109,283-143,166	02
Z59	* Equal Emp Compliance&Policy Co	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	05
Z16	* Ethics Officer	FR			\$218,005	00
YC35	* Ethics Policy Analyst	060	\$ 63.51- 83.00	\$11,008-14,387	\$132,101-172,640	05
VC04	Executive Assistant I (C)	044	\$ 41.00- 54.00	\$ 7,107- 9,360	\$ 85,280-112,320	05
VC05	Executive Assistant II (C)	048	\$ 45.76- 60.18	\$ 7,932-10,431	\$ 95,181-125,174	05
VC13	* Executive Assistant to the GC	051	\$ 49.67- 65.25	\$ 8,609-11,310	\$103,314-135,720	05
VC14	* Executive Assistant to the GM	051	\$ 49.67- 65.25	\$ 8,609-11,310	\$103,314-135,720	05
021	* Executive Legislative Rep	081	\$ 86.25-117.85	\$14,950-20,427	\$179,400-245,128	01
Z56	* Executive Legislative Rep (C)	073	\$ 89.98-117.85	\$15,597-20,427	\$187,158-245,128	05
061	* Executive Secretary	051	\$ 49.67- 65.25	\$ 8,609-11,310	\$103,314-135,720	04
017	* Executive Strategist	073	\$ 89.98-117.85	\$15,597-20,427	\$187,158-245,128	05
SA07	Facilities Maint Assistant	029	\$ 27.16- 35.76	\$ 4,708- 6,198	\$ 56,493- 74,381	02
TA14	Facilities Maint Mechanic	037	\$ 33.84- 44.54	\$ 5,866- 7,720	\$ 70,387- 92,643	02
YA32	Fleet Coordinator	048	\$ 45.76- 60.18	\$ 7,932-10,431	\$ 95,181-125,174	02
VA17	Fleet Dispatch Coordinator	035	\$ 32.09- 42.16	\$ 5,562- 7,308	\$ 66,747- 87,693	02
VA16	Fleet Dispatcher	031	\$ 28.68- 37.75	\$ 4,971- 6,543	\$ 59,654- 78,520	02
041	* General Auditor	FR			\$260,749	00
031	* General Counsel	FR			\$325,166	00
706	General Maintenance Asst	021	\$ 21.78- 28.68	\$ 3,775- 4,971	\$ 45,302- 59,654	02
001	* General Manager	FR			\$434,990	00
YC22	* Government&Regional Aff Rep(C)	052	\$ 51.13- 66.98	\$ 8,863-11,610	\$106,350-139,318	05
YA37	Graphic Arts Designer	048	\$ 45.76- 60.18	\$ 7,932-10,431	\$ 95,181-125,174	02
XA24	Graphic Technician I	034	\$ 31.18- 41.00	\$ 5,405- 7,107	\$ 64,854- 85,280	02

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SALARY SCHEDULE

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Classification Code	Title	Salary Grade	Hourly Range	Monthly Range	Annual Range	Unit Code
XA25	Graphic Technician II	038	\$ 34.79- 45.76	\$ 6,030- 7,932	\$ 72,363- 95,181	02
XA26	Graphic Technician III	043	\$ 39.91- 52.54	\$ 6,918- 9,107	\$ 83,013-109,283	02
SA08	Grounds Maintenance Worker	029	\$ 27.16- 35.76	\$ 4,708- 6,198	\$ 56,493- 74,381	02
Z01	* Group Manager	086	\$ 98.77-134.92	\$17,120-23,386	\$205,442-280,634	01
Z60	* Group Manager-Engineering Svcs	089	\$107.10-146.42	\$18,564-25,379	\$222,768-304,554	01
Z58	* Group Manager-External Affairs	086	\$ 98.77-134.92	\$17,120-23,386	\$205,442-280,634	01
Z54	* Group Manager-Human Resources	086	\$ 98.77-134.92	\$17,120-23,386	\$205,442-280,634	01
Z66	* Group Manager-Info Technology	088	\$104.27-142.46	\$18,073-24,693	\$216,882-296,317	01
Z61	* Group Manager-Real Property	086	\$ 98.77-134.92	\$17,120-23,386	\$205,442-280,634	01
Z62	* Group Manager-Water Resrc Mgmt	088	\$104.27-142.46	\$18,073-24,693	\$216,882-296,317	01
Z63	* Group Manager-Water System Ops	089	\$107.10-146.42	\$18,564-25,379	\$222,768-304,554	01
VC06	HR Assistant I (C)	031	\$ 28.68- 37.75	\$ 4,971- 6,543	\$ 59,654- 78,520	05
VC07	HR Assistant II (C)	035	\$ 32.09- 42.16	\$ 5,562- 7,308	\$ 66,747- 87,693	05
VC08	HR Assistant III (C)	039	\$ 35.76- 47.02	\$ 6,198- 8,150	\$ 74,381- 97,802	05
UMA03	* HR Strategic Partner	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	05
Z40	* HRIS Manager	063	\$ 68.83- 89.98	\$11,931-15,597	\$143,166-187,158	05
YC30	Human Resources Analyst I (C)	039	\$ 35.76- 47.02	\$ 6,198- 8,150	\$ 74,381- 97,802	05
YC31	Human Resources Analyst II (C)	042	\$ 38.81- 51.13	\$ 6,727- 8,863	\$ 80,725-106,350	05
YC32	* Human Resources Analyst III(C)	045	\$ 42.16- 55.52	\$ 7,308- 9,623	\$ 87,693-115,482	05
VC09	Human Resources Coordinator	041	\$ 37.75- 49.67	\$ 6,543- 8,609	\$ 78,520-103,314	05
Z22	* Human Resources Manager I	075	\$ 73.26-100.14	\$12,698-17,358	\$152,381-200,291	01
Z23	* Human Resources Manager II	078	\$ 79.47-108.59	\$13,775-18,822	\$165,298-225,867	01
Z24	* Human Resources Manager III	081	\$ 86.25-117.85	\$14,950-20,427	\$179,400-245,128	01
Z03D	* Human Resources Section Mgr	080	\$ 83.90-114.69	\$14,543-19,880	\$174,512-238,555	01
T08	Hydroelectric Specialist I	042	\$ 38.81- 51.13	\$ 6,727- 8,863	\$ 80,725-106,350	02
T05	Hydroelectric Specialist II	048	\$ 45.76- 60.18	\$ 7,932-10,431	\$ 95,181-125,174	02
530	* Hydroelectric Supervisor	058	\$ 60.18- 78.63	\$10,431-13,629	\$125,174-163,550	03
Y12	* IT Architect-Enterprsr Software	063	\$ 68.83- 89.98	\$11,931-15,597	\$143,166-187,158	04
YA106	IT Business Analyst I	037	\$ 33.84- 44.54	\$ 5,866- 7,720	\$ 70,387- 92,643	02
YA107	IT Business Analyst II	042	\$ 38.81- 51.13	\$ 6,727- 8,863	\$ 80,725-106,350	02
YA108	IT Business Analyst III	047	\$ 44.54- 58.60	\$ 7,720-10,157	\$ 92,643-121,888	02
XA27A	IT Communication Tech I	038	\$ 34.79- 45.76	\$ 6,030- 7,932	\$ 72,363- 95,181	02
XA28A	IT Communication Tech II	043	\$ 39.91- 52.54	\$ 6,918- 9,107	\$ 83,013-109,283	02
XA29A	IT Communication Tech III	047	\$ 44.54- 58.60	\$ 7,720-10,157	\$ 92,643-121,888	02
YA38	IT Enterprise App Analyst I	037	\$ 33.84- 44.54	\$ 5,866- 7,720	\$ 70,387- 92,643	02
YA39	IT Enterprise App Analyst II	042	\$ 38.81- 51.13	\$ 6,727- 8,863	\$ 80,725-106,350	02
YA40	IT Enterprise App Analyst III	047	\$ 44.54- 58.60	\$ 7,720-10,157	\$ 92,643-121,888	02
YA33	IT GIS Analyst I	037	\$ 33.84- 44.54	\$ 5,866- 7,720	\$ 70,387- 92,643	02
YA34	IT GIS Analyst II	042	\$ 38.81- 51.13	\$ 6,727- 8,863	\$ 80,725-106,350	02
YA35	IT GIS Analyst III	047	\$ 44.54- 58.60	\$ 7,720-10,157	\$ 92,643-121,888	02
YA42	IT Infrastructure Adminstr I	037	\$ 33.84- 44.54	\$ 5,866- 7,720	\$ 70,387- 92,643	02
YA43	IT Infrastructure Adminstr II	042	\$ 38.81- 51.13	\$ 6,727- 8,863	\$ 80,725-106,350	02
YA44	IT Infrastructure Adminstr III	047	\$ 44.54- 58.60	\$ 7,720-10,157	\$ 92,643-121,888	02
YA46	IT Network Engineer I	037	\$ 33.84- 44.54	\$ 5,866- 7,720	\$ 70,387- 92,643	02
YA47	IT Network Engineer II	042	\$ 38.81- 51.13	\$ 6,727- 8,863	\$ 80,725-106,350	02
YA48	IT Network Engineer III	047	\$ 44.54- 58.60	\$ 7,720-10,157	\$ 92,643-121,888	02
YA52	IT Project Controls Specialist	044	\$ 41.00- 54.00	\$ 7,107- 9,360	\$ 85,280-112,320	02
YA54	IT Quality Analyst I	037	\$ 33.84- 44.54	\$ 5,866- 7,720	\$ 70,387- 92,643	02
YA55	IT Quality Analyst II	042	\$ 38.81- 51.13	\$ 6,727- 8,863	\$ 80,725-106,350	02
YA56	IT Quality Analyst III	047	\$ 44.54- 58.60	\$ 7,720-10,157	\$ 92,643-121,888	02
PM032	* IT Service Manager	064	\$ 70.66- 92.39	\$12,248-16,014	\$146,973-192,171	04
YA58	IT Software Developer I	037	\$ 33.84- 44.54	\$ 5,866- 7,720	\$ 70,387- 92,643	02
YA59	IT Software Developer II	042	\$ 38.81- 51.13	\$ 6,727- 8,863	\$ 80,725-106,350	02
YA60	IT Software Developer III	047	\$ 44.54- 58.60	\$ 7,720-10,157	\$ 92,643-121,888	02
Y05	* IT Specialist -Disaster Recvry	058	\$ 60.18- 78.63	\$10,431-13,629	\$125,174-163,550	04
XA31A	IT Support Analyst I	037	\$ 33.84- 44.54	\$ 5,866- 7,720	\$ 70,387- 92,643	02
XA32A	IT Support Analyst II	042	\$ 38.81- 51.13	\$ 6,727- 8,863	\$ 80,725-106,350	02
XA33A	IT Support Analyst III	047	\$ 44.54- 58.60	\$ 7,720-10,157	\$ 92,643-121,888	02
YA62	IT System Administrator I	037	\$ 33.84- 44.54	\$ 5,866- 7,720	\$ 70,387- 92,643	02
YA63	IT System Administrator II	042	\$ 38.81- 51.13	\$ 6,727- 8,863	\$ 80,725-106,350	02
YA64	IT System Administrator III	047	\$ 44.54- 58.60	\$ 7,720-10,157	\$ 92,643-121,888	02
Y18	* Info Gov&Ent Content Mgmt Spec	059	\$ 61.85- 80.78	\$10,721-14,002	\$128,648-168,022	04
YC11	Info Tech Analyst I (C)	037	\$ 33.84- 44.54	\$ 5,866- 7,720	\$ 70,387- 92,643	05
YC12	Info Tech Analyst II (C)	042	\$ 38.81- 51.13	\$ 6,727- 8,863	\$ 80,725-106,350	05
YC13	* Info Tech Analyst III (C)	047	\$ 44.54- 58.60	\$ 7,720-10,157	\$ 92,643-121,888	05
Y14	* Info Technology Architect	064	\$ 70.66- 92.39	\$12,248-16,014	\$146,973-192,171	04
Y06	* Inland Feeder Projects Admintr	058	\$ 60.18- 78.63	\$10,431-13,629	\$125,174-163,550	04
Y10	* Inspection Trip Manager	061	\$ 65.25- 85.23	\$11,310-14,773	\$135,720-177,278	04
Y17	* Inspection Trip Specialist	058	\$ 60.18- 78.63	\$10,431-13,629	\$125,174-163,550	04
184	Inspector IV	050	\$ 48.38- 63.51	\$ 8,386-11,008	\$100,630-132,101	03

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SALARY SCHEDULE

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Classification Code	Title	Salary Grade	Hourly Range	Monthly Range	Annual Range	Unit Code
XA16	Instrumnt&Cntrl Tech I	035	\$ 32.09- 42.16	\$ 5,562- 7,308	\$ 66,747- 87,693	02
XA17	Instrumnt&Cntrl Tech II	039	\$ 35.76- 47.02	\$ 6,198- 8,150	\$ 74,381- 97,802	02
XA18	Instrumnt&Cntrl Tech III	044	\$ 41.00- 54.00	\$ 7,107- 9,360	\$ 85,280-112,320	02
XA19	Instrumnt&Cntrl Tech Specialist	047	\$ 44.54- 58.60	\$ 7,720-10,157	\$ 92,643-121,888	02
716	Inventory Coordinator	044	\$ 41.00- 54.00	\$ 7,107- 9,360	\$ 85,280-112,320	03
PM033	* Investment Mgmt Specialist	060	\$ 63.51- 83.00	\$11,008-14,387	\$132,101-172,640	04
XA35A	Lab Info Systems Specialist I	042	\$ 38.81- 51.13	\$ 6,727- 8,863	\$ 80,725-106,350	02
XA36A	Lab Info Systems Specialist II	048	\$ 45.76- 60.18	\$ 7,932-10,431	\$ 95,181-125,174	02
UA16	Laboratory Assistant I	025	\$ 24.35- 32.09	\$ 4,221- 5,562	\$ 50,648- 66,747	02
UA17	Laboratory Assistant II	029	\$ 27.16- 35.76	\$ 4,708- 6,198	\$ 56,493- 74,381	02
XA40	Laboratory Technologist I	034	\$ 31.18- 41.00	\$ 5,405- 7,107	\$ 64,854- 85,280	02
XA41	Laboratory Technologist II	036	\$ 32.98- 43.30	\$ 5,717- 7,505	\$ 68,598- 90,064	02
YA66	Land Surveyor	053	\$ 52.54- 68.83	\$ 9,107-11,931	\$109,283-143,166	02
705	Landscape Maint Coordinator	044	\$ 41.00- 54.00	\$ 7,107- 9,360	\$ 85,280-112,320	03
XA42A	Landscape Maintenance Tech I	038	\$ 34.79- 45.76	\$ 6,030- 7,932	\$ 72,363- 95,181	02
XA43A	Landscape Maintenance Tech II	043	\$ 39.91- 52.54	\$ 6,918- 9,107	\$ 83,013-109,283	02
VA08	Law Clerk	029	\$ 27.16- 35.76	\$ 4,708- 6,198	\$ 56,493- 74,381	02
Z30	* Law Office Administrator (C)	059	\$ 61.85- 80.78	\$10,721-14,002	\$128,648-168,022	05
YA67	Legal Analyst	044	\$ 41.00- 54.00	\$ 7,107- 9,360	\$ 85,280-112,320	02
VA09	Legal Assistant I	033	\$ 30.30- 39.91	\$ 5,252- 6,918	\$ 63,024- 83,013	02
VA10	Legal Assistant II	037	\$ 33.84- 44.54	\$ 5,866- 7,720	\$ 70,387- 92,643	02
VA11	Legal Assistant III	041	\$ 37.75- 49.67	\$ 6,543- 8,609	\$ 78,520-103,314	02
UC01	Legal Secretary I (C)	028	\$ 26.37- 34.79	\$ 4,571- 6,030	\$ 54,850- 72,363	05
UC02	Legal Secretary II (C)	035	\$ 32.09- 42.16	\$ 5,562- 7,308	\$ 66,747- 87,693	05
YA104	Legal Technology Specialist	047	\$ 44.54- 58.60	\$ 7,720-10,157	\$ 92,643-121,888	02
Y09	* Legislative Representative	048	\$ 45.76- 60.18	\$ 7,932-10,431	\$ 95,181-125,174	05
YA72	Limnologist	048	\$ 45.76- 60.18	\$ 7,932-10,431	\$ 95,181-125,174	02
T06	Lineman	046	\$ 43.30- 57.04	\$ 7,505- 9,887	\$ 90,064-118,643	02
SA09	Lodging Assistant I	029	\$ 27.16- 35.76	\$ 4,708- 6,198	\$ 56,493- 74,381	02
SA10	Lodging Assistant II	033	\$ 30.30- 39.91	\$ 5,252- 6,918	\$ 63,024- 83,013	02
UA08	Mailroom Assistant I	016	\$ 19.00- 25.00	\$ 3,293- 4,333	\$ 39,520- 52,000	02
UA09	Mailroom Assistant II	021	\$ 21.78- 28.68	\$ 3,775- 4,971	\$ 45,302- 59,654	02
UA10	Mailroom Assistant III	026	\$ 25.00- 32.98	\$ 4,333- 5,717	\$ 52,000- 68,598	02
620	Maintenance Mechanic I	037	\$ 33.84- 44.54	\$ 5,866- 7,720	\$ 70,387- 92,643	02
612	Maintenance Worker I	025	\$ 24.35- 32.09	\$ 4,221- 5,562	\$ 50,648- 66,747	02
613	Maintenance Worker II	029	\$ 27.16- 35.76	\$ 4,708- 6,198	\$ 56,493- 74,381	02
614	Maintenance Worker III	033	\$ 30.30- 39.91	\$ 5,252- 6,918	\$ 63,024- 83,013	02
Z39	* Manager of Admin Services	070	\$ 83.00-108.59	\$14,387-18,822	\$172,640-225,867	05
Z70	* Manager of Bay-Delta Programs	082	\$ 88.56-121.05	\$15,350-20,982	\$184,205-251,784	01
Z33	* Manager of Colo RiverResources	080	\$ 83.90-114.69	\$14,543-19,880	\$174,512-238,555	01
Z35	* Manager of Financial Services	072	\$ 87.57-114.69	\$15,179-19,880	\$182,146-238,555	05
SM020	* Manager of Treasury&Debt Mgmt	072	\$ 87.57-114.69	\$15,179-19,880	\$182,146-238,555	04
M81	* Mgt Pr Admin Analyst	055	\$ 55.52- 72.54	\$ 9,623-12,574	\$115,482-150,883	04
YA77	Microbiologist	048	\$ 45.76- 60.18	\$ 7,932-10,431	\$ 95,181-125,174	02
186	* Microcomputer Technology Supv	059	\$ 61.85- 80.78	\$10,721-14,002	\$128,648-168,022	03
636	* O & M Supervisor	055	\$ 55.52- 72.54	\$ 9,623-12,574	\$115,482-150,883	03
S03P	+ O&M Tech I	028	\$ 26.37- 34.79	\$ 4,571- 6,030	\$ 54,850- 72,363	02
S03A	+ O&M Tech I	027	\$ 25.67- 33.84	\$ 4,449- 5,866	\$ 53,394- 70,387	02
S03	+ O&M Tech I	028	\$ 26.37- 34.79	\$ 4,571- 6,030	\$ 54,850- 72,363	02
S02A	+ O&M Tech II	031	\$ 28.68- 37.75	\$ 4,971- 6,543	\$ 59,654- 78,520	02
S02P	+ O&M Tech II	032	\$ 29.51- 38.81	\$ 5,115- 6,727	\$ 61,381- 80,725	02
S02	+ O&M Tech II	032	\$ 29.51- 38.81	\$ 5,115- 6,727	\$ 61,381- 80,725	02
T10P	+ O&M Tech III	036	\$ 32.98- 43.30	\$ 5,717- 7,505	\$ 68,598- 90,064	02
T10	+ O&M Tech III	036	\$ 32.98- 43.30	\$ 5,717- 7,505	\$ 68,598- 90,064	02
T10A	+ O&M Tech III	035	\$ 32.09- 42.16	\$ 5,562- 7,308	\$ 66,747- 87,693	02
T03A	+ O&M Tech IV	041	\$ 37.75- 49.67	\$ 6,543- 8,609	\$ 78,520-103,314	02
T03FS	+ O&M Tech IV	042	\$ 38.81- 51.13	\$ 6,727- 8,863	\$ 80,725-106,350	02
T03	+ O&M Tech IV	042	\$ 38.81- 51.13	\$ 6,727- 8,863	\$ 80,725-106,350	02
YA80	Oc Health Safety Specialist I	031	\$ 28.68- 37.75	\$ 4,971- 6,543	\$ 59,654- 78,520	02
YA81	Oc Health Safety Specialist II	038	\$ 34.79- 45.76	\$ 6,030- 7,932	\$ 72,363- 95,181	02
YA82	Oc Health Safety Specialist III	043	\$ 39.91- 52.54	\$ 6,918- 9,107	\$ 83,013-109,283	02
927	* Occ Safety & Health Spec	054	\$ 54.00- 70.66	\$ 9,360-12,248	\$112,320-146,973	04
UA11	Office Assistant	026	\$ 25.00- 32.98	\$ 4,333- 5,717	\$ 52,000- 68,598	02
Z53	* Operations Program Manager	067	\$ 76.59-100.14	\$13,276-17,358	\$159,307-208,291	04
SA11	Ops and Maintenance Assistant	021	\$ 21.78- 28.68	\$ 3,775- 4,971	\$ 45,302- 59,654	02
Z44	* Org Develop & Training Manager	064	\$ 70.66- 92.39	\$12,248-16,014	\$146,973-192,171	05
Z28	* Payroll Administrator	053	\$ 52.54- 68.83	\$ 9,107-11,931	\$109,283-143,166	04
XA45	Photographer I	035	\$ 32.09- 42.16	\$ 5,562- 7,308	\$ 66,747- 87,693	02
XA46	Photographer II	041	\$ 37.75- 49.67	\$ 6,543- 8,609	\$ 78,520-103,314	02
XA48	Planner Scheduler	043	\$ 39.91- 52.54	\$ 6,918- 9,107	\$ 83,013-109,283	02

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SALARY SCHEDULE

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Classification Code	Title	Salary Grade	Hourly Range	Monthly Range	Annual Range	Unit Code
139	* Plant Laboratory Supervisor	055	\$ 55.52- 72.54	\$ 9,623-12,574	\$115,482-150,883	03
519	* Plant Operations Supervisor	058	\$ 60.18- 78.63	\$10,431-13,629	\$125,174-163,550	03
Y20	* Postdoctoral Research Assoc	046	\$ 43.30- 57.04	\$ 7,505- 9,887	\$ 90,064-118,643	04
PM028	* Power Planning Specialist	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	04
YA03	Pr Accountant	049	\$ 47.02- 61.85	\$ 8,150-10,721	\$ 97,802-128,648	02
YC56	* Pr Admin Analyst	066	\$ 57.67- 78.63	\$ 9,996-13,629	\$119,954-163,550	01
YA06	Pr Admin Analyst	055	\$ 55.52- 72.54	\$ 9,623-12,574	\$115,482-150,883	02
YC05	* Pr Admin Analyst (C)	056	\$ 57.04- 74.61	\$ 9,887-12,932	\$118,643-155,189	05
Y16	* Pr Architect	064	\$ 70.66- 92.39	\$12,248-16,014	\$146,973-192,171	04
216	* Pr Auditor	058	\$ 60.18- 78.63	\$10,431-13,629	\$125,174-163,550	04
YC44	* Pr Benefits Analyst (C)	056	\$ 57.04- 74.61	\$ 9,887-12,932	\$118,643-155,189	05
YA11	Pr Biologist	058	\$ 60.18- 78.63	\$10,431-13,629	\$125,174-163,550	02
245	* Pr Buyer	055	\$ 55.52- 72.54	\$ 9,623-12,574	\$115,482-150,883	04
YA19	Pr Chemist	058	\$ 60.18- 78.63	\$10,431-13,629	\$125,174-163,550	02
YC50	* Pr Class & Comp Analyst (C)	056	\$ 57.04- 74.61	\$ 9,887-12,932	\$118,643-155,189	05
XA15	Pr Designer	048	\$ 45.76- 60.18	\$ 7,932-10,431	\$ 95,181-125,174	02
YC48	* Pr EEO Analyst (C)	056	\$ 57.04- 74.61	\$ 9,887-12,932	\$118,643-155,189	05
YC40	* Pr Emp Relations Specialist	060	\$ 63.51- 83.00	\$11,008-14,387	\$132,101-172,640	05
115	* Pr Engineer	064	\$ 70.66- 92.39	\$12,248-16,014	\$146,973-192,171	04
165	* Pr Engineering Technician	058	\$ 60.18- 78.63	\$10,431-13,629	\$125,174-163,550	04
925	* Pr Environmental Spec	063	\$ 68.83- 89.98	\$11,931-15,597	\$143,166-187,158	04
YC24	* Pr Government&Region AffRep(C)	060	\$ 63.51- 83.00	\$11,008-14,387	\$132,101-172,640	05
YC52	* Pr HR Training Specialist (C)	055	\$ 55.52- 72.54	\$ 9,623-12,574	\$115,482-150,883	05
YC46	* Pr HRIS Analyst (C)	056	\$ 57.04- 74.61	\$ 9,887-12,932	\$118,643-155,189	05
231	* Pr Info Tech Analyst	056	\$ 57.04- 74.61	\$ 9,887-12,932	\$118,643-155,189	04
YC15	* Pr Info Tech Analyst (C)	056	\$ 57.04- 74.61	\$ 9,887-12,932	\$118,643-155,189	05
YC64	* Pr Info Tech Network Engineer	058	\$ 60.18- 78.63	\$10,431-13,629	\$125,174-163,550	04
Y07	* Pr Land Surveyor	058	\$ 60.18- 78.63	\$10,431-13,629	\$125,174-163,550	04
YA69	Pr Legal Analyst	055	\$ 55.52- 72.54	\$ 9,623-12,574	\$115,482-150,883	02
022	* Pr Legislative Representative	062	\$ 66.98- 87.57	\$11,610-15,179	\$139,318-182,146	05
YA74	Pr Limnologist	058	\$ 60.18- 78.63	\$10,431-13,629	\$125,174-163,550	02
YA79	Pr Microbiologist	058	\$ 60.18- 78.63	\$10,431-13,629	\$125,174-163,550	02
YA105	Pr Project Controls Specialist	056	\$ 57.04- 74.61	\$ 9,887-12,932	\$118,643-155,189	02
289	* Pr Public Affairs Rep	058	\$ 60.18- 78.63	\$10,431-13,629	\$125,174-163,550	04
275	* Pr Real Estate Rep	053	\$ 52.54- 68.83	\$ 9,107-11,931	\$109,283-143,166	04
YC54	* Pr Recruitment Specialist (C)	056	\$ 57.04- 74.61	\$ 9,887-12,932	\$118,643-155,189	05
933	* Pr Resource Specialist	063	\$ 68.83- 89.98	\$11,931-15,597	\$143,166-187,158	04
223	* Pr Systems Analyst	054	\$ 54.00- 70.66	\$ 9,360-12,248	\$112,320-146,973	04
YC17	* Pr Training Administrator (C)	056	\$ 57.04- 74.61	\$ 9,887-12,932	\$118,643-155,189	05
YC10	* Pr Training Specialist (C)	056	\$ 57.04- 74.61	\$ 9,887-12,932	\$118,643-155,189	05
YA103	Pr Water Quality Specialist	058	\$ 60.18- 78.63	\$10,431-13,629	\$125,174-163,550	02
S01	Pre-Apprentice	017	\$ 19.55- 25.67	\$ 3,389- 4,449	\$ 40,664- 53,394	02
PM031	* Prgrm Mgr-Audit	065	\$ 72.54- 94.87	\$12,574-16,444	\$150,883-197,330	04
PM021	* Prgrm Mgr-Bay-Delta Initiative	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	04
PM002	* Prgrm Mgr-Business Continuity	060	\$ 63.51- 83.00	\$11,008-14,387	\$132,101-172,640	04
PM027	* Prgrm Mgr-Business Outreach	060	\$ 63.51- 83.00	\$11,008-14,387	\$132,101-172,640	04
PMA02	* Prgrm Mgr-Community Relations	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	05
PM004	* Prgrm Mgr-Corporate Resources	060	\$ 63.51- 83.00	\$11,008-14,387	\$132,101-172,640	04
PM029	* Prgrm Mgr-Creative Design	063	\$ 68.83- 89.98	\$11,931-15,597	\$143,166-187,158	04
PM005	* Prgrm Mgr-Dam Safety Initiativs	071	\$ 85.23-111.63	\$14,773-19,349	\$177,278-232,190	04
PM006	* Prgrm Mgr-Emergency Management	063	\$ 68.83- 89.98	\$11,931-15,597	\$143,166-187,158	04
PM026	* Prgrm Mgr-Engineering	067	\$ 76.59-100.14	\$13,276-17,358	\$159,307-208,291	04
PM001	* Prgrm Mgr-Finance	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	04
PM007	* Prgrm Mgr-Fleet	060	\$ 63.51- 83.00	\$11,008-14,387	\$132,101-172,640	04
PM009	* Prgrm Mgr-Info Technology	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	04
PM013	* Prgrm Mgr-Power Sched&Trading	060	\$ 63.51- 83.00	\$11,008-14,387	\$132,101-172,640	04
PM014	* Prgrm Mgr-Press Office	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	04
PM022	* Prgrm Mgr-Real Property	060	\$ 63.51- 83.00	\$11,008-14,387	\$132,101-172,640	04
PM015	* Prgrm Mgr-Regnl Recycled Water	071	\$ 85.23-111.63	\$14,773-19,349	\$177,278-232,190	04
PM023	* Prgrm Mgr-Safety&RegCompliance	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	04
PM017	* Prgrm Mgr-Water Resource	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	04
PM019	* Prgrm Mgr-Web	063	\$ 68.83- 89.98	\$11,931-15,597	\$143,166-187,158	04
XA50	Production Planner	048	\$ 45.76- 60.18	\$ 7,932-10,431	\$ 95,181-125,174	02
Z13D	* Program Manager I	068	\$ 60.77- 83.00	\$10,533-14,387	\$126,402-172,640	01
Z13E	* Program Manager II	071	\$ 65.83- 89.98	\$11,411-15,597	\$136,926-187,158	01
Z13F	* Program Manager III	074	\$ 71.39- 97.40	\$12,374-16,883	\$148,491-202,592	01
YA85	Project Controls Specialist	045	\$ 42.16- 55.52	\$ 7,308- 9,623	\$ 87,693-115,482	02
TA23	Property Maintenance Tech	041	\$ 37.75- 49.67	\$ 6,543- 8,609	\$ 78,520-103,314	02
YA87	Public Affairs Rep I	038	\$ 34.79- 45.76	\$ 6,030- 7,932	\$ 72,363- 95,181	02
YA88	Public Affairs Rep II	043	\$ 39.91- 52.54	\$ 6,918- 9,107	\$ 83,013-109,283	02

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SALARY SCHEDULE

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Classification Code	Title	Salary Grade	Hourly Range	Monthly Range	Annual Range	Unit Code
TA21	Pump Plant Maint Operator I	032	\$ 29.51- 38.81	\$ 5,115- 6,727	\$ 61,381- 80,725	02
TA22	Pump Plant Maint Operator II	036	\$ 32.98- 43.30	\$ 5,717- 7,505	\$ 68,598- 90,064	02
T01	Pump Plant Specialist	048	\$ 45.76- 60.18	\$ 7,932-10,431	\$ 95,181-125,174	02
YA90	Quality Assurance Officer	056	\$ 57.04- 74.61	\$ 9,887-12,932	\$118,643-155,189	02
YA91	Real Estate Representative I	037	\$ 33.84- 44.54	\$ 5,866- 7,720	\$ 70,387- 92,643	02
YA92	Real Estate Representative II	042	\$ 38.81- 51.13	\$ 6,727- 8,863	\$ 80,725-106,350	02
YA93	Real Estate Representative III	046	\$ 43.30- 57.04	\$ 7,505- 9,887	\$ 90,064-118,643	02
UA12	Reprographics Technician I	023	\$ 23.02- 30.30	\$ 3,990- 5,252	\$ 47,882- 63,024	02
UA13	Reprographics Technician II	028	\$ 26.37- 34.79	\$ 4,571- 6,030	\$ 54,850- 72,363	02
UA14	Reprographics Technician III	031	\$ 28.68- 37.75	\$ 4,971- 6,543	\$ 59,654- 78,520	02
YA98	Resource Specialist	055	\$ 55.52- 72.54	\$ 9,623-12,574	\$115,482-150,883	02
Z03B	* Section Manager I (C)	067	\$ 76.59-100.14	\$13,276-17,358	\$159,307-208,291	05
Z03C	* Section Manager II (C)	069	\$ 80.78-105.72	\$14,002-18,325	\$168,022-219,898	05
SM005	* Section Mgr-Business Outreach	068	\$ 78.63-102.89	\$13,629-17,834	\$163,550-214,011	04
SM014	* Section Mgr-Conveyance&Distrbn	073	\$ 89.98-117.85	\$15,597-20,427	\$187,158-245,128	04
SM002	* Section Mgr-Customer&Comm Svcs	068	\$ 78.63-102.89	\$13,629-17,834	\$163,550-214,011	04
SM015	* Section Mgr-Engineering Svcs	073	\$ 89.98-117.85	\$15,597-20,427	\$187,158-245,128	04
SM009	* Section Mgr-Environ Planning	072	\$ 87.57-114.69	\$15,179-19,880	\$182,146-238,555	04
SM003	* Section Mgr-Legislative Svcs	068	\$ 78.63-102.89	\$13,629-17,834	\$163,550-214,011	04
SM004	* Section Mgr-Media Services	068	\$ 78.63-102.89	\$13,629-17,834	\$163,550-214,011	04
SM006	* Section Mgr-MembrSvc&PubOutrch	068	\$ 78.63-102.89	\$13,629-17,834	\$163,550-214,011	04
SM010	* Section Mgr-Ops Safety&Reg Srv	072	\$ 87.57-114.69	\$15,179-19,880	\$182,146-238,555	04
SM011	* Section Mgr-Ops Support Svcs	072	\$ 87.57-114.69	\$15,179-19,880	\$182,146-238,555	04
SM012	* Section Mgr-Power Ops&Planning	072	\$ 87.57-114.69	\$15,179-19,880	\$182,146-238,555	04
SM018	* Section Mgr-Real Property	071	\$ 85.23-111.63	\$14,773-19,349	\$177,278-232,190	04
SM007	* Section Mgr-Rev, Rates &Budget	068	\$ 78.63-102.89	\$13,629-17,834	\$163,550-214,011	04
SM019	* Section Mgr-Revenue & Budget	072	\$ 87.57-114.69	\$15,179-19,880	\$182,146-238,555	04
SM013	* Section Mgr-Water Ops&Planning	072	\$ 87.57-114.69	\$15,179-19,880	\$182,146-238,555	04
SM016	* Section Mgr-Water Quality	073	\$ 89.98-117.85	\$15,597-20,427	\$187,158-245,128	04
SM008	* Section Mgr-Water Resource Mgt	072	\$ 87.57-114.69	\$15,179-19,880	\$182,146-238,555	04
SM017	* Section Mgr-Water Treatment	073	\$ 89.98-117.85	\$15,597-20,427	\$187,158-245,128	04
WC01	Security Specialist (C)	051	\$ 49.67- 65.25	\$ 8,609-11,310	\$103,314-135,720	05
V02	* Special Asst to the GM	072	\$ 67.61- 92.39	\$11,719-16,014	\$140,629-192,171	01
Z16A	* Special Projects Manager	072	\$ 87.57-114.69	\$15,179-19,880	\$182,146-238,555	05
YA02	Sr Accountant	045	\$ 42.16- 55.52	\$ 7,308- 9,623	\$ 87,693-115,482	02
VA03	Sr Accounting Tech	039	\$ 35.76- 47.02	\$ 6,198- 8,150	\$ 74,381- 97,802	02
YA05	Sr Admin Analyst	049	\$ 47.02- 61.85	\$ 8,150-10,721	\$ 97,802-128,648	02
YC04	* Sr Admin Analyst (C)	049	\$ 47.02- 61.85	\$ 8,150-10,721	\$ 97,802-128,648	05
Y01	* Sr Architect	059	\$ 61.85- 80.78	\$10,721-14,002	\$128,648-168,022	04
YC43	* Sr Benefits Analyst (C)	049	\$ 47.02- 61.85	\$ 8,150-10,721	\$ 97,802-128,648	05
YA10	Sr Biologist	053	\$ 52.54- 68.83	\$ 9,107-11,931	\$109,283-143,166	02
YC07	* Sr Board Specialist (C)	050	\$ 48.38- 63.51	\$ 8,386-11,008	\$100,630-132,101	05
YA14	Sr Buyer	048	\$ 45.76- 60.18	\$ 7,932-10,431	\$ 95,181-125,174	02
YA18	Sr Chemist	053	\$ 52.54- 68.83	\$ 9,107-11,931	\$109,283-143,166	02
YC49	* Sr Class & Comp Analyst (C)	049	\$ 47.02- 61.85	\$ 8,150-10,721	\$ 97,802-128,648	05
XA08	Sr Crane Certification Tech	048	\$ 45.76- 60.18	\$ 7,932-10,431	\$ 95,181-125,174	02
XA10	Sr Cross Connection Tech	048	\$ 45.76- 60.18	\$ 7,932-10,431	\$ 95,181-125,174	02
Z11	* Sr Dep Gen Counsel Lbr Reltns	079	\$ 81.67-111.63	\$14,156-19,349	\$169,874-232,190	01
YA23	Sr Deputy Auditor	052	\$ 51.13- 66.98	\$ 8,863-11,610	\$106,350-139,318	02
XA14	Sr Designer	043	\$ 39.91- 52.54	\$ 6,918- 9,107	\$ 83,013-109,283	02
YC20	* Sr Dpty General Counsel (C)	071	\$ 85.23-111.63	\$14,773-19,349	\$177,278-232,190	05
YC47	* Sr EEO Analyst (C)	049	\$ 47.02- 61.85	\$ 8,150-10,721	\$ 97,802-128,648	05
YC28	* Sr EHS Field Specialist (C)	053	\$ 52.54- 68.83	\$ 9,107-11,931	\$109,283-143,166	05
YC41	* Sr Emp Relations Specialist	054	\$ 54.00- 70.66	\$ 9,360-12,248	\$112,320-146,973	05
114	* Sr Engineer	060	\$ 63.51- 83.00	\$11,008-14,387	\$132,101-172,640	04
XA23A	Sr Engineering Technician	053	\$ 52.54- 68.83	\$ 9,107-11,931	\$109,283-143,166	02
924	* Sr Environmental Specialist	059	\$ 61.85- 80.78	\$10,721-14,002	\$128,648-168,022	03
YC04A	* Sr Financial Analyst (C)	051	\$ 49.67- 65.25	\$ 8,609-11,310	\$103,314-135,720	05
YC23	* Sr Government&Region AffRep(C)	057	\$ 58.60- 76.59	\$10,157-13,276	\$121,888-159,307	05
YC51	* Sr HR Training Specialist (C)	048	\$ 45.76- 60.18	\$ 7,932-10,431	\$ 95,181-125,174	05
YC45	* Sr HRIS Analyst (C)	049	\$ 47.02- 61.85	\$ 8,150-10,721	\$ 97,802-128,648	05
YA109	Sr IT Business Analyst	052	\$ 51.13- 66.98	\$ 8,863-11,610	\$106,350-139,318	02
XA30A	Sr IT Communication Technician	050	\$ 48.38- 63.51	\$ 8,386-11,008	\$100,630-132,101	02
YA41	Sr IT Enterprise App Analyst	052	\$ 51.13- 66.98	\$ 8,863-11,610	\$106,350-139,318	02
YA36	Sr IT GIS Analyst	052	\$ 51.13- 66.98	\$ 8,863-11,610	\$106,350-139,318	02
YA45	Sr IT Infrastructure Adminstr	052	\$ 51.13- 66.98	\$ 8,863-11,610	\$106,350-139,318	02
YA49	Sr IT Network Engineer	053	\$ 52.54- 68.83	\$ 9,107-11,931	\$109,283-143,166	02
YA53	Sr IT Proj Controls Specialist	049	\$ 47.02- 61.85	\$ 8,150-10,721	\$ 97,802-128,648	02
YA57	Sr IT Quality Analyst	052	\$ 51.13- 66.98	\$ 8,863-11,610	\$106,350-139,318	02
YA61	Sr IT Software Developer	052	\$ 51.13- 66.98	\$ 8,863-11,610	\$106,350-139,318	02

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Classification Code	Title	Salary Grade	Hourly Range	Monthly Range	Annual Range	Unit Code
XA34A	Sr IT Support Analyst	051	\$ 49.67- 65.25	\$ 8,609-11,310	\$103,314-135,720	02
YA65	Sr IT System Administrator	052	\$ 51.13- 66.98	\$ 8,863-11,610	\$106,350-139,318	02
201	* Sr Info Systems Auditor	055	\$ 55.52- 72.54	\$ 9,623-12,574	\$115,482-150,883	04
YC14	* Sr Info Tech Analyst (C)	052	\$ 51.13- 66.98	\$ 8,863-11,610	\$106,350-139,318	05
XA37A	Sr Lab Info Systems Specialist	053	\$ 52.54- 68.83	\$ 9,107-11,931	\$109,283-143,166	02
XA44A	Sr Landscape Maintenance Tech	048	\$ 45.76- 60.18	\$ 7,932-10,431	\$ 95,181-125,174	02
YA68	Sr Legal Analyst	049	\$ 47.02- 61.85	\$ 8,150-10,721	\$ 97,802-128,648	02
UC03	Sr Legal Secretary (C)	040	\$ 36.74- 48.38	\$ 6,368- 8,386	\$ 76,419-100,630	05
YA73	Sr Limmologist	053	\$ 52.54- 68.83	\$ 9,107-11,931	\$109,283-143,166	02
YA78	Sr Microbiologist	053	\$ 52.54- 68.83	\$ 9,107-11,931	\$109,283-143,166	02
928	* Sr Occup Safety & Health Spec	058	\$ 60.18- 78.63	\$10,431-13,629	\$125,174-163,550	04
XA49	Sr Planner Scheduler	048	\$ 45.76- 60.18	\$ 7,932-10,431	\$ 95,181-125,174	02
YA86	Sr Project Controls Specialist	050	\$ 48.38- 63.51	\$ 8,386-11,008	\$100,630-132,101	02
YA89	Sr Public Affairs Rep	048	\$ 45.76- 60.18	\$ 7,932-10,431	\$ 95,181-125,174	02
YA94	Sr Real Estate Representative	050	\$ 48.38- 63.51	\$ 8,386-11,008	\$100,630-132,101	02
YC53	* Sr Recruitment Specialist (C)	049	\$ 47.02- 61.85	\$ 8,150-10,721	\$ 97,802-128,648	05
UA15	Sr Reprographic Technician	034	\$ 31.18- 41.00	\$ 5,405- 7,107	\$ 64,854- 85,280	02
155	* Sr Research Chemist	058	\$ 60.18- 78.63	\$10,431-13,629	\$125,174-163,550	03
932	* Sr Resource Specialist	059	\$ 61.85- 80.78	\$10,721-14,002	\$128,648-168,022	03
XA56	Sr System Operations Tech	053	\$ 52.54- 68.83	\$ 9,107-11,931	\$109,283-143,166	02
TA17	Sr System Operator	048	\$ 45.76- 60.18	\$ 7,932-10,431	\$ 95,181-125,174	02
XA62A	Sr Technical Writer	053	\$ 52.54- 68.83	\$ 9,107-11,931	\$109,283-143,166	02
YC16	* Sr Training Administrator (C)	051	\$ 49.67- 65.25	\$ 8,609-11,310	\$103,314-135,720	05
YC09	* Sr Training Specialist (C)	050	\$ 48.38- 63.51	\$ 8,386-11,008	\$100,630-132,101	05
YA102	Sr Water Quality Specialist	053	\$ 52.54- 68.83	\$ 9,107-11,931	\$109,283-143,166	02
XA69	Sr Water Quality Technician	048	\$ 45.76- 60.18	\$ 7,932-10,431	\$ 95,181-125,174	02
V01	* Staff Assistant to the GM	072	\$ 67.61- 92.39	\$11,719-16,014	\$140,629-192,171	01
Z43	* Staffing Manager	062	\$ 66.98- 87.57	\$11,610-15,179	\$139,318-182,146	05
VA12	Storekeeper I	026	\$ 25.00- 32.98	\$ 4,333- 5,717	\$ 52,000- 68,598	02
VA13	Storekeeper II	031	\$ 28.68- 37.75	\$ 4,971- 6,543	\$ 59,654- 78,520	02
VA14	Storekeeper III	035	\$ 32.09- 42.16	\$ 5,562- 7,308	\$ 66,747- 87,693	02
Y19	* Strategic Comm&Policy Advisor	081	\$ 86.25-117.85	\$14,950-20,427	\$179,400-245,128	01
PMA01	* Strategic Program Mgr, HR	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	05
Y13	Student Intern	016	\$ 14.67- 20.06	\$ 2,543- 3,477	\$ 30,514- 41,725	01
S04	Student Intern Desert	010	\$ 16.12- 21.18	\$ 2,794- 3,671	\$ 33,530- 44,054	02
UA18	Student Youth Intern	014	\$ 13.92- 19.00	\$ 2,413- 3,293	\$ 28,954- 39,520	01
260	* Supervising Admin Analyst	049	\$ 47.02- 61.85	\$ 8,150-10,721	\$ 97,802-128,648	03
XA51A	Survey and Mapping Tech I	036	\$ 32.98- 43.30	\$ 5,717- 7,505	\$ 68,598- 90,064	02
XA52A	Survey and Mapping Tech II	040	\$ 36.74- 48.38	\$ 6,368- 8,386	\$ 76,419-100,630	02
XA53A	Survey and Mapping Tech III	048	\$ 45.76- 60.18	\$ 7,932-10,431	\$ 95,181-125,174	02
XA54A	Survey and Mapping Tech IV	053	\$ 52.54- 68.83	\$ 9,107-11,931	\$109,283-143,166	02
XA55	System Operations Technician	048	\$ 45.76- 60.18	\$ 7,932-10,431	\$ 95,181-125,174	02
TA16	System Operator	045	\$ 42.16- 55.52	\$ 7,308- 9,623	\$ 87,693-115,482	02
Z06A	* Team Manager I	055	\$ 55.52- 72.54	\$ 9,623-12,574	\$115,482-150,883	03
Z06B	* Team Manager II	056	\$ 57.04- 74.61	\$ 9,887-12,932	\$118,643-155,189	03
Z06C	* Team Manager III	058	\$ 60.18- 78.63	\$10,431-13,629	\$125,174-163,550	03
Z06D	* Team Manager IV	059	\$ 61.85- 80.78	\$10,721-14,002	\$128,648-168,022	03
Z06R	* Team Manager IV (C)	058	\$ 60.18- 78.63	\$10,431-13,629	\$125,174-163,550	05
Z06E	* Team Manager V	060	\$ 63.51- 83.00	\$11,008-14,387	\$132,101-172,640	03
Z06S	* Team Manager V (C)	060	\$ 63.51- 83.00	\$11,008-14,387	\$132,101-172,640	05
Z06F	* Team Manager VI	064	\$ 70.66- 92.39	\$12,248-16,014	\$146,973-192,171	03
Z06G	* Team Manager VII	065	\$ 72.54- 94.87	\$12,574-16,444	\$150,883-197,330	03
TM001	* Team Mgr-Admin Svcs Bus Mgmt	059	\$ 61.85- 80.78	\$10,721-14,002	\$128,648-168,022	04
TM080	* Team Mgr-Budget	062	\$ 66.98- 87.57	\$11,610-15,179	\$139,318-182,146	04
TM002	* Team Mgr-Business Applications	063	\$ 68.83- 89.98	\$11,931-15,597	\$143,166-187,158	04
TM061	* Team Mgr-Business Intel System	062	\$ 66.98- 87.57	\$11,610-15,179	\$139,318-182,146	04
TM003	* Team Mgr-Chemistry	064	\$ 70.66- 92.39	\$12,248-16,014	\$146,973-192,171	04
TM079	* Team Mgr-Community Relations	063	\$ 68.83- 89.98	\$11,931-15,597	\$143,166-187,158	04
TM005	* Team Mgr-Construction Mgmt I	060	\$ 63.51- 83.00	\$11,008-14,387	\$132,101-172,640	04
TM004	* Team Mgr-Construction Mgmt II	065	\$ 72.54- 94.87	\$12,574-16,444	\$150,883-197,330	04
TM064	* Team Mgr-ConstructionContracts	065	\$ 72.54- 94.87	\$12,574-16,444	\$150,883-197,330	04
TM006	* Team Mgr-Control Systems Apps	064	\$ 70.66- 92.39	\$12,248-16,014	\$146,973-192,171	04
TM007	* Team Mgr-Corrosion Control	064	\$ 70.66- 92.39	\$12,248-16,014	\$146,973-192,171	04
TM078	* Team Mgr-Creative Design	063	\$ 68.83- 89.98	\$11,931-15,597	\$143,166-187,158	04
TM008	* Team Mgr-Database	063	\$ 68.83- 89.98	\$11,931-15,597	\$143,166-187,158	04
TM009	* Team Mgr-Design	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	04
TM073	* Team Mgr-Design Support	057	\$ 58.60- 76.59	\$10,157-13,276	\$121,888-159,307	04
TM072	* Team Mgr-Design Technology	059	\$ 61.85- 80.78	\$10,721-14,002	\$128,648-168,022	04
TM013	* Team Mgr-Eng Compliance	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	04
TM012	* Team Mgr-Engineering Administr	064	\$ 70.66- 92.39	\$12,248-16,014	\$146,973-192,171	04

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SALARY SCHEDULE

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Classification Code	Title	Salary Grade	Hourly Range	Monthly Range	Annual Range	Unit Code
TM014	* Team Mgr-Enterprise Apps	063	\$ 68.83- 89.98	\$11,931-15,597	\$143,166-187,158	04
TM022	* Team Mgr-Enterprise GIS & CAD	062	\$ 66.98- 87.57	\$11,610-15,179	\$139,318-182,146	04
TM015	* Team Mgr-EnterprsrWaterSysPrgrm	065	\$ 72.54- 94.87	\$12,574-16,444	\$150,883-197,330	04
TM065	* Team Mgr-Environ Planning	065	\$ 72.54- 94.87	\$12,574-16,444	\$150,883-197,330	04
TM016	* Team Mgr-Environ Prgrm Support	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	04
TM011	* Team Mgr-Ext Affairs Bus Mgmt	059	\$ 61.85- 80.78	\$10,721-14,002	\$128,648-168,022	04
TM019	* Team Mgr-Facility Operations	059	\$ 61.85- 80.78	\$10,721-14,002	\$128,648-168,022	04
TM018	* Team Mgr-Facility Planning	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	04
TM020	* Team Mgr-Field Survey	065	\$ 72.54- 94.87	\$12,574-16,444	\$150,883-197,330	04
TM033	* Team Mgr-FinanceRpt&PlantAsset	059	\$ 61.85- 80.78	\$10,721-14,002	\$128,648-168,022	04
TM021	* Team Mgr-Geodetics and Mapping	065	\$ 72.54- 94.87	\$12,574-16,444	\$150,883-197,330	04
TM023	* Team Mgr-Graphic Design	058	\$ 60.18- 78.63	\$10,431-13,629	\$125,174-163,550	04
TMA01	* Team Mgr-HR Business Support	058	\$ 60.18- 78.63	\$10,431-13,629	\$125,174-163,550	05
TM024	* Team Mgr-Health&SafetyPrgrmSup	064	\$ 70.66- 92.39	\$12,248-16,014	\$146,973-192,171	04
TM025	* Team Mgr-Hydraulics&SysMdlng	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	04
TM026	* Team Mgr-Hydroelectric	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	04
TM027	* Team Mgr-IT Administration	062	\$ 66.98- 87.57	\$11,610-15,179	\$139,318-182,146	04
TM074	* Team Mgr-IT Business Analysis	061	\$ 65.25- 85.23	\$11,310-14,773	\$135,720-177,278	04
TM077	* Team Mgr-IT Client Systems Spt	060	\$ 63.51- 83.00	\$11,008-14,387	\$132,101-172,640	04
TM066	* Team Mgr-IT Prgrm Project Sppt	065	\$ 72.54- 94.87	\$12,574-16,444	\$150,883-197,330	04
TM028	* Team Mgr-IT Quality Assurance	061	\$ 65.25- 85.23	\$11,310-14,773	\$135,720-177,278	04
TM010	* Team Mgr-IT Service Desk	060	\$ 63.51- 83.00	\$11,008-14,387	\$132,101-172,640	04
TM067	* Team Mgr-Info Security	061	\$ 65.25- 85.23	\$11,310-14,773	\$135,720-177,278	04
TM046	* Team Mgr-InternalCntr&WaterInv	059	\$ 61.85- 80.78	\$10,721-14,002	\$128,648-168,022	04
TM029	* Team Mgr-Inventory Control	056	\$ 57.04- 74.61	\$ 9,887-12,932	\$118,643-155,189	04
TM075	* Team Mgr-Laboratory Support	056	\$ 57.04- 74.61	\$ 9,887-12,932	\$118,643-155,189	03
TM068	* Team Mgr-LandPlanning&Managemt	063	\$ 68.83- 89.98	\$11,931-15,597	\$143,166-187,158	04
TM031	* Team Mgr-Maint Engineering	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	04
TM032	* Team Mgr-Materials&Metallurgy	060	\$ 63.51- 83.00	\$11,008-14,387	\$132,101-172,640	04
TM034	* Team Mgr-Microbiology	064	\$ 70.66- 92.39	\$12,248-16,014	\$146,973-192,171	04
TM035	* Team Mgr-Operations App Svcs	063	\$ 68.83- 89.98	\$11,931-15,597	\$143,166-187,158	04
TM036	* Team Mgr-Operations Compliance	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	04
TM076	* Team Mgr-Operations Planning	064	\$ 70.66- 92.39	\$12,248-16,014	\$146,973-192,171	04
TM037	* Team Mgr-Ops Control Center	064	\$ 70.66- 92.39	\$12,248-16,014	\$146,973-192,171	04
TM060	* Team Mgr-Power Ops& Scheduling	064	\$ 70.66- 92.39	\$12,248-16,014	\$146,973-192,171	04
TM038	* Team Mgr-Procurement	059	\$ 61.85- 80.78	\$10,721-14,002	\$128,648-168,022	04
TM039	* Team Mgr-Prof Contracting Svcs	059	\$ 61.85- 80.78	\$10,721-14,002	\$128,648-168,022	04
TM040	* Team Mgr-Program Management	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	04
TM041	* Team Mgr-Project Support	060	\$ 63.51- 83.00	\$11,008-14,387	\$132,101-172,640	04
TM063	* Team Mgr-Property Management	063	\$ 68.83- 89.98	\$11,931-15,597	\$143,166-187,158	04
TM042	* Team Mgr-Pump Plant	061	\$ 65.25- 85.23	\$11,310-14,773	\$135,720-177,278	04
TM043	* Team Mgr-QltyAsrn&CompSampling	064	\$ 70.66- 92.39	\$12,248-16,014	\$146,973-192,171	04
TM044	* Team Mgr-Real Prop Bus Mgmt	059	\$ 61.85- 80.78	\$10,721-14,002	\$128,648-168,022	04
TM045	* Team Mgr-RecordsMgt&ImagingSvc	059	\$ 61.85- 80.78	\$10,721-14,002	\$128,648-168,022	04
TM030	* Team Mgr-Reservoir Management	064	\$ 70.66- 92.39	\$12,248-16,014	\$146,973-192,171	04
TM069	* Team Mgr-Resource Development	064	\$ 70.66- 92.39	\$12,248-16,014	\$146,973-192,171	04
TM070	* Team Mgr-Resource Planning	064	\$ 70.66- 92.39	\$12,248-16,014	\$146,973-192,171	04
TM062	* Team Mgr-Right of Way Acquistn	063	\$ 68.83- 89.98	\$11,931-15,597	\$143,166-187,158	04
TM047	* Team Mgr-Safety of Dams	065	\$ 72.54- 94.87	\$12,574-16,444	\$150,883-197,330	04
TM017	* Team Mgr-Safety&RegSvcSiteSupt	064	\$ 70.66- 92.39	\$12,248-16,014	\$146,973-192,171	04
TMA02	* Team Mgr-SafetyRegTechTraining	060	\$ 63.51- 83.00	\$11,008-14,387	\$132,101-172,640	05
TM048	* Team Mgr-Security Management	064	\$ 70.66- 92.39	\$12,248-16,014	\$146,973-192,171	04
TM049	* Team Mgr-Server Administration	064	\$ 70.66- 92.39	\$12,248-16,014	\$146,973-192,171	04
TM050	* Team Mgr-Substructures	064	\$ 70.66- 92.39	\$12,248-16,014	\$146,973-192,171	04
TM051	* Team Mgr-Supply Acquisition	064	\$ 70.66- 92.39	\$12,248-16,014	\$146,973-192,171	04
TM053	* Team Mgr-Technical Control	065	\$ 72.54- 94.87	\$12,574-16,444	\$150,883-197,330	04
TM054	* Team Mgr-Technical Writing	058	\$ 60.18- 78.63	\$10,431-13,629	\$125,174-163,550	04
TM055	* Team Mgr-Telecommunications	064	\$ 70.66- 92.39	\$12,248-16,014	\$146,973-192,171	04
TM071	* Team Mgr-Treasury Operations	059	\$ 61.85- 80.78	\$10,721-14,002	\$128,648-168,022	04
TM058	* Team Mgr-WRM Business Mgmt	059	\$ 61.85- 80.78	\$10,721-14,002	\$128,648-168,022	04
TM059	* Team Mgr-WSO Business Mgmt	059	\$ 61.85- 80.78	\$10,721-14,002	\$128,648-168,022	04
TM056	* Team Mgr-Warehouse	056	\$ 57.04- 74.61	\$ 9,887-12,932	\$118,643-155,189	04
TM057	* Team Mgr-Water Efficiency	064	\$ 70.66- 92.39	\$12,248-16,014	\$146,973-192,171	04
XA57	Technical Illustrator I	038	\$ 34.79- 45.76	\$ 6,030- 7,932	\$ 72,363- 95,181	02
XA58	Technical Illustrator II	043	\$ 39.91- 52.54	\$ 6,918- 9,107	\$ 83,013-109,283	02
XA59A	Technical Writer I	038	\$ 34.79- 45.76	\$ 6,030- 7,932	\$ 72,363- 95,181	02
XA60A	Technical Writer II	043	\$ 39.91- 52.54	\$ 6,918- 9,107	\$ 83,013-109,283	02
XA61A	Technical Writer III	048	\$ 45.76- 60.18	\$ 7,932-10,431	\$ 95,181-125,174	02
YC55	* Training Administrator	045	\$ 42.16- 55.52	\$ 7,308- 9,623	\$ 87,693-115,482	05
VC10	Training Assistant I	030	\$ 27.93- 36.74	\$ 4,841- 6,368	\$ 58,094- 76,419	05

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SALARY SCHEDULE

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Classification Code	Title	Salary Grade	Hourly Range	Monthly Range	Annual Range	Unit Code
VC11	Training Assistant II	034	\$ 31.18- 41.00	\$ 5,405- 7,107	\$ 64,854- 85,280	05
VC12	Training Assistant III	038	\$ 34.79- 45.76	\$ 6,030- 7,932	\$ 72,363- 95,181	05
Y15	* Training Logistics Specialist	059	\$ 61.85- 80.78	\$10,721-14,002	\$128,648-168,022	03
YC08	* Training Specialist (C)	045	\$ 42.16- 55.52	\$ 7,308- 9,623	\$ 87,693-115,482	05
ASM01	* Treasurer	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	04
VA15	Treasury Administrator	039	\$ 35.76- 47.02	\$ 6,198- 8,150	\$ 74,381- 97,802	02
Z05E	* Unit Manager V	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	04
Z05J	* Unit Manager V (C)	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	05
UM001	* Unit Mgr-Accounting	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	04
UM002	* Unit Mgr-Application Services	067	\$ 76.59-100.14	\$13,276-17,358	\$159,307-208,291	04
UM003	* Unit Mgr-Apprentice&TechTrain	064	\$ 70.66- 92.39	\$12,248-16,014	\$146,973-192,171	04
UM004	* Unit Mgr-Audit	065	\$ 72.54- 94.87	\$12,574-16,444	\$150,883-197,330	04
UMA01	* Unit Mgr-Benefits Services	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	05
UM031	* Unit Mgr-Budget	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	04
UM030	* Unit Mgr-Chemistry	068	\$ 78.63-102.89	\$13,629-17,834	\$163,550-214,011	04
UMA02	* Unit Mgr-ClassComp&Recruitment	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	05
UM005	* Unit Mgr-Construction Services	068	\$ 78.63-102.89	\$13,629-17,834	\$163,550-214,011	04
UM006	* Unit Mgr-Contracting Services	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	04
UM007	* Unit Mgr-Conveyance&Distribtn	068	\$ 78.63-102.89	\$13,629-17,834	\$163,550-214,011	04
UM008	* Unit Mgr-Document Services	064	\$ 70.66- 92.39	\$12,248-16,014	\$146,973-192,171	04
UM009	* Unit Mgr-Education	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	04
UM010	* Unit Mgr-Engineering Services	069	\$ 80.78-105.72	\$14,002-18,325	\$168,022-219,898	04
UM038	* Unit Mgr-Environmental Plng	069	\$ 80.78-105.72	\$14,002-18,325	\$168,022-219,898	04
UM011	* Unit Mgr-Facility Management	067	\$ 76.59-100.14	\$13,276-17,358	\$159,307-208,291	04
UM012	* Unit Mgr-Fleet Services	065	\$ 72.54- 94.87	\$12,574-16,444	\$150,883-197,330	04
UM016	* Unit Mgr-IT Infrastructure	068	\$ 78.63-102.89	\$13,629-17,834	\$163,550-214,011	04
UM033	* Unit Mgr-IT Program Mgt Office	067	\$ 76.59-100.14	\$13,276-17,358	\$159,307-208,291	04
UM017	* Unit Mgr-IT Project Planning	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	04
UM032	* Unit Mgr-IT Security	068	\$ 78.63-102.89	\$13,629-17,834	\$163,550-214,011	04
UM013	* Unit Mgr-Implemnt Proj&Studies	068	\$ 78.63-102.89	\$13,629-17,834	\$163,550-214,011	04
UM014	* Unit Mgr-Imported Supply	068	\$ 78.63-102.89	\$13,629-17,834	\$163,550-214,011	04
UM015	* Unit Mgr-Info Security Svcs	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	04
UM037	* Unit Mgr-Laboratory Services	068	\$ 78.63-102.89	\$13,629-17,834	\$163,550-214,011	04
UM023	* Unit Mgr-Land Management	067	\$ 76.59-100.14	\$13,276-17,358	\$159,307-208,291	04
UM018	* Unit Mgr-Manufacturing Svcs	068	\$ 78.63-102.89	\$13,629-17,834	\$163,550-214,011	04
UM029	* Unit Mgr-Microbiology	068	\$ 78.63-102.89	\$13,629-17,834	\$163,550-214,011	04
UM019	* Unit Mgr-Ops Planning&Program	068	\$ 78.63-102.89	\$13,629-17,834	\$163,550-214,011	04
UM036	* Unit Mgr-Ops Proj & Asset Mgmt	069	\$ 80.78-105.72	\$14,002-18,325	\$168,022-219,898	04
UM021	* Unit Mgr-Planning and Acquistn	067	\$ 76.59-100.14	\$13,276-17,358	\$159,307-208,291	04
UM020	* Unit Mgr-Power&EquipReliabilty	068	\$ 78.63-102.89	\$13,629-17,834	\$163,550-214,011	04
UM035	* Unit Mgr-Rates, Charges&FinPlan	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	04
UM039	* Unit Mgr-Reporting	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	04
UM024	* Unit Mgr-Risk Management	065	\$ 72.54- 94.87	\$12,574-16,444	\$150,883-197,330	04
UM034	* Unit Mgr-Security	068	\$ 78.63-102.89	\$13,629-17,834	\$163,550-214,011	04
UM025	* Unit Mgr-System Analysis	069	\$ 80.78-105.72	\$14,002-18,325	\$168,022-219,898	04
UM026	* Unit Mgr-System Operations	068	\$ 78.63-102.89	\$13,629-17,834	\$163,550-214,011	04
UM027	* Unit Mgr-Water Purification	068	\$ 78.63-102.89	\$13,629-17,834	\$163,550-214,011	04
UM028	* Unit Mgr-Water Treatment Plant	068	\$ 78.63-102.89	\$13,629-17,834	\$163,550-214,011	04
XA63	Videographer I	035	\$ 32.09- 42.16	\$ 5,562- 7,308	\$ 66,747- 87,693	02
XA64	Videographer II	041	\$ 37.75- 49.67	\$ 6,543- 8,609	\$ 78,520-103,314	02
YA101	Water Quality Specialist	048	\$ 45.76- 60.18	\$ 7,932-10,431	\$ 95,181-125,174	02
XA66	Water Quality Technician I	033	\$ 30.30- 39.91	\$ 5,252- 6,918	\$ 63,024- 83,013	02
XA67	Water Quality Technician II	038	\$ 34.79- 45.76	\$ 6,030- 7,932	\$ 72,363- 95,181	02
XA68	Water Quality Technician III	043	\$ 39.91- 52.54	\$ 6,918- 9,107	\$ 83,013-109,283	02
XA70A	Water Sampling Field Tech	033	\$ 30.30- 39.91	\$ 5,252- 6,918	\$ 63,024- 83,013	02
Z38	* Workers Compensation Manager	066	\$ 74.61- 97.40	\$12,932-16,883	\$155,189-202,592	05
T13	Wtr Treatment Plant Specialist	048	\$ 45.76- 60.18	\$ 7,932-10,431	\$ 95,181-125,174	02
TA18	Wtr Trtment Plant Operator I	035	\$ 32.09- 42.16	\$ 5,562- 7,308	\$ 66,747- 87,693	02
TA19	Wtr Trtment Plant Operator II	040	\$ 36.74- 48.38	\$ 6,368- 8,386	\$ 76,419-100,630	02
TA20	Wtr Trtment Plant Operator III	045	\$ 42.16- 55.52	\$ 7,308- 9,623	\$ 87,693-115,482	02

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Classification Code	Title	Salary Grade	Hourly Range	Monthly Range	Annual Range	Unit Code
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Unit Code

00 - Executive
 01 - Unrepresented
 02 - AFSCME Local 1902
 03 - Supervisors Association
 04 - Management&Professional Assoc
 05 - Assoc of Conf Employees

* Not Eligible for Overtime

O&M Tech Titles

+ O&M Tech I
 S03A (Grade 27): Carpenter, Coater, Equipment Operator, Fleet, Plumber, Welder-Fabricator
 S03 (Grade 28): Electrical, HVAC, Machinist, Mechanical
 S03P (Grade 28 - Apprentice): Electrical, Mechanical
 + O&M Tech II
 S02A (Grade 31): Carpenter, Coater, Equipment Operator, Fleet, Plumber, Welder-Fabricator
 S02 (Grade 32): Electrical, HVAC, Machinist, Mechanical
 S02P (Grade 32 - Apprentice): Electrical, Mechanical
 + O&M Tech III
 T10A (Grade 35): Carpenter, Coater, Equipment Operator, Fleet, Plumber, Welder-Fabricator
 T10 (Grade 36): Electrical, HVAC, Machinist, Mechanical
 T10P (Grade 36 - Apprentice): Electrical, Mechanical
 + O&M Tech IV
 T03A (Grade 41): Carpenter, Coater, Equipment Operator, Fleet, Plumber, Welder-Fabricator
 T03 (Grade 42): Electrical, HVAC, Machinist, Mechanical
 T03FS (Grade 42): Welder-Fabricator/Field Services

End of Report



Approve Employee Salary Schedule Pursuant to CalPERS Regulations

Organization, Personnel and Technology Committee
Item 7-7
October 12, 2021

Purpose and Background

- Metropolitan's Board is required by CalPERS to annually approve and adopt a salary schedule.
- Doing so does not amend or revise Memoranda of Understanding (MOUs), which have already been approved by the Board.

Governing Authority

- California Code of Regulations, Section 570.5
- Pay rate for calculating pensions specifically limited to amount listed on a *pay schedule*
- *Pay schedule* must
 - Be approved and adopted by the Board
 - Identify the position title for every employee
 - Show the pay rate for each identified position
 - Indicate the effective date
 - Meet public posting requirements

Changes to Salary Schedule for 2021

- Implements changes from the Board-approved MOUs
- Implements any newly created job titles or revised job descriptions

Options

- Option #1: Approve the salary schedule to conform with California Code of Regulations, Section 570.5
- Option #2: Do not approve the salary schedule

Staff Recommendation

- Option #1: Approve the updated salary schedule





- **Board of Directors**
Water Planning and Stewardship Committee

10/12/2021 Board Meeting

7-8

Subject

Adopt framework for amending Local Resources Program Agreements; Review and consider the City of Beverly Hills' approved Final Mitigated Negative Declaration and take related CEQA actions; and authorize the General Manager to reinstate and amend the existing Local Resources Program agreement for the Beverly Hills Desalter Project

Executive Summary

The Local Resources Program (LRP) provides financial incentives to encourage the development of local water supplies for Southern California. The LRP evolved over time to include refinements to the incentive amount, process for determining the incentive, and agreement terms. Each LRP agreement includes performance provisions that require projects to maintain a level of production through the contract term. The Beverly Hills Desalter LRP encountered unforeseen production problems and the agreement terminated after five consecutive years of non payment from Metropolitan. The City of Beverly Hills is appealing this termination. Metropolitan staff recommends that the Board grant the appeal and authorize the General Manager to reinstate and amend the agreement.

Details

Background

In 1982, Metropolitan created the Local Resources Program (LRP) to provide financial incentives to help local agencies develop water recycling and groundwater recovery projects. Since inception, Metropolitan provided about \$708 million in incentives for the development of more than 3.0 million acre-feet (AF) of recycled water and 1.1 million AF of recovered groundwater. There are 100 projects currently in operation. LRP projects increase water supply reliability, reduce imported water demands, decrease the burden on the Metropolitan's infrastructure, reduce system costs, and free up conveyance capacity. In addition, the LRP helps Metropolitan meet its legislative mandates under SB 60 to expand water conservation, recycling, and groundwater storage and replenishment measures. Overall, the LRP provides benefits to all member agencies regardless of project location.

Metropolitan coordinated with member agencies to refine the program in 2014 to modify performance provisions, increase the maximum incentive amount to \$340/AF, provide three alternative payment options, include on-site retrofit costs as an eligible cost, offer reimbursable services, and added seawater desalination as an eligible resource. Subsequent to the 2014 program modifications, Metropolitan accepted 18 new projects that are now in various stages of design, construction, and operation. In 2018, the Board authorized an Interim Program target of 170,000 AF.

Current LRP Performance Provisions for Project Production

Performance provisions are an important component of the LRP agreements since they encourage both project development and continued performance. Performance provisions allow Metropolitan to free up contractual commitments for projects that are unlikely to achieve their original timeline or production targets. This allows the Board to reallocate released project capacity for future LRP projects.

Some older LRP agreements include a performance provision that automatically terminates an agreement if the project does not receive incentives from Metropolitan for a period of five consecutive years. LRP incentives are stopped if: (1) the project unit cost is less than Metropolitan's effective rate for sliding scale incentives; or (2) the project is no longer producing water. Newer LRP agreements include performance provisions that provide staff more flexibility to work with agencies experiencing project disruptions.

The City of Beverly Hills (Beverly Hills) encountered significant unforeseen production impacts to its LRP project that were outside of their control and resulted in the project being shutdown in 2015. The agreement was automatically terminated in 2020 after five consecutive years of non payment from Metropolitan.

Framework for Future Requests to Pause and Extend the Term of LRP Contracts

In June 2021, the Board approved a framework that provides agencies an ability to request additional time to begin LRP project operation when they experience start-up delays. Staff recognizes that LRP projects may also face production issues that are beyond the agency's control.

Similar to the June 2021 action, board-approval is sought to provide additional flexibility to agencies to return projects to operation after a disruption. The proposed framework would, with the Board's approval, allow a one-time pause in the required production and an equal-time extension of the agreement term. The extension would be for no longer than three years, and only for projects that had previously started operation. The proposed framework recognizes that LRP production may fail from Acts of God, unforeseen changes in water quality, facility failure, or source water changes.

Metropolitan would apply this consideration to an agency that faces unforeseen production issues that significantly affect production of a project. The proposed framework to amend LRP agreements would assist agencies to correct the deficiencies and bring the project back online.

In June 2021, the Board adopted the evaluation criteria for LRP extension requests that modify the start-of-operation milestone for LRP projects. Staff will use the same criteria to evaluate extension requests for projects facing unforeseen production issues out of the agency's control: (1) formally request an extension and describe the reasons for the pause and describe the actions being taken to correct the issue; (2) affirm that all parties to the agreement are still pursuing the project; (3) provide a revised schedule; and (4) affirm that the project will start operation within the requested extension (not to exceed three fiscal years). All other performance provisions of the agreement would remain in place and the LRP incentives would not exceed the maximum authorization provided by the Board previously.

Attachment 1 is Beverly Hills' request to reinstate and amend their agreement to extend the contract term due to a project shutdown that resulted from unforeseen water quality issues. The request is consistent with the proposed framework and the evaluation criteria approved by the Board. Staff recommends that the Board approve the framework and approve Beverly Hills' request to reinstate and amend the agreement to extend the contract term by three years.

Policy

Metropolitan Water District Administrative Code Section 11104: Delegation of Responsibilities

By Minute Item 43171, dated September 15, 1998, the Board approved authorizing the General Manager to execute a Groundwater Recovery Program Agreement with the City of Beverly Hills to implement the Beverly Hills Desalter Project.

By Minute Item 49923, dated October 14, 2014, the Board approved refinements to the Local Resources Program to encourage additional local resource production.

By Minute Item 51356, dated October 9, 2018, the Board approved an interim Local Resources Program target yield of 170,000 AFY of new water production.

By Minute Item 52415, dated June 8, 2021, the Board approved changes to the start-of-operation timing for four Local Resources Program Projects and formally adopt the policy described in the board letter for evaluation of future LRP extension requests.

California Environmental Quality Act (CEQA)

CEQA determination for Option #1:

Action No. 1 - Adopt framework for amending Local Resources Program Agreements

The proposed action to adopt a framework for amending Local Resources Program Agreements is not defined as a project under CEQA because it involves continuing administrative activities, such as general policy and procedure making and other government fiscal activities which do not involve any commitment to any specific project which may result in a potentially significant physical impact on the environment (Section 15378(b)(2) and Section 15378(b)(4) of the State CEQA Guidelines).

Action No. 2 - Review and consider the City of Beverly Hills' approved Final Mitigated Negative Declarations and Addendum and take related CEQA actions, and authorize the General Manager to reinstate and amend the existing Local Resources Program agreement for the Beverly Hills Desalter Project

Pursuant to the provisions of CEQA and the State CEQA Guidelines, the City of Beverly Hills, acting as Lead Agency, prepared a Final Mitigated Negative Declaration (Final MND) for the original project, which was reviewed and approved by Metropolitan on August 25, 1998. On November 20, 2019, Beverly Hills prepared and approved a separate Final MND for the La Brea Subarea Well and Transmission Main Project, addressing the proposed new facilities, upgrades, and improvements. Finally, on March 4, 2021, Beverly Hills prepared an Addendum to this second Final MND which identified some minor project modifications. The Lead Agency also approved the Mitigation Monitoring and Reporting Program (MMRP) for the Project as revised.

Metropolitan, as a Responsible Agency under CEQA, is required to certify that it has reviewed and considered the information in the Final MNDs and Addendum, and adopt the Lead Agency's findings and MMRP prior to approval of the formal terms and conditions for the proposed agreement. The environmental documentation is included as **Attachment 2**.

CEQA determination for Option #2:

None required

Board Option

Option #1

Review and consider the City of Beverly Hills' approved Final Mitigated Negative Declarations and Addendum and take related CEQA actions; authorize the General Manager to reinstate and amend the existing Groundwater Recovery Program Joint Participation Agreement for Recovery and Utilization of Degraded Groundwater for the Beverly Hills Desalter Project with the City of Beverly Hills for up to 2,600 AFY of advanced treated brackish groundwater under the terms included in this letter and approve the proposed framework and one-time pause and extension of agreement terms.

Fiscal Impact: Metropolitan's maximum financial obligation under the original agreement will not change due to the reinstatement and proposed amendment to the agreement. Metropolitan would provide up to \$1.95 million for up to 7,800 AF of project production over three years. Staff factors these incentive payments into Metropolitan's rate projections and includes them in future budgets.

Business Analysis: The project would help Metropolitan achieve its Integrated Resources Plan (IRP) goals and meet its legislative mandates, while reducing the district's system costs.

Option #2

Do not authorize the reinstatement or amendment to the original agreement for the Project.

Fiscal Impact: None

Business Analysis: Metropolitan would pursue other projects and it may take longer to meet IRP goals

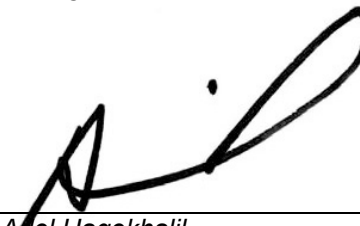
Staff Recommendation

Option #1



Brad Coffey
Manager, Water Resource Management

10/6/2021

Date

Adel Hagekhalil
General Manager

10/6/2021

Date

Attachment 1 – Local Resources Program (LRP) Request for Reinstatement of Terminated LRP Agreement and Extension to Term of Agreement

Attachment 2 – Initial Study and Negative Declaration* For the City of Beverly Hills Municipal Water and Public Works Facility Project

Ref# wrm12681057

**REQUEST FOR REINSTATEMENT OF TERMINATED LRP AGREEMENT
AND EXTENSION TO TERM OF AGREEMENT**

Project Information

LRP Project:	Beverly Hills Desalter Improvements and Upgrades Project
Member Agency:	City of Beverly Hills
Ultimate Yield:	2,600 AF
Started operation:	April 2003
Stopped operation:	September 2015
Agreement expiration:	June 2023
Agreement termination:	June 2020

Member Agency Request:

1. Reinstate program agreement
2. Extend the agreement term by three years, terminating June 30, 2026

Additional Information:

- Project improvements needed to get project back online are currently under construction.
- Member agency is actively pursuing project.
- Member agency provided revised schedule.
- Member agency affirmed that the project will start operations within three years.

Reasons for Requested Extension:

The Project helped incentivize the first new local supply for the city and when in operation it provided 5-10 percent of Beverly Hills total municipal and industrial demand. At maximum production, the Project can produce up to 25 percent of the city's total needs. Without the Project, Beverly Hills remains 100 percent dependent on Metropolitan for its supply of potable water.

The Project produced about 12,800 AF (25 percent of its contractual volume) and was shut down due to unforeseen changes in groundwater quality. Increased levels of fine sand, iron sulfide and manganese in the Hollywood Groundwater Basin underlying much of Beverly Hills resulted in extreme fouling of the reverse osmosis membranes and eventual shutdown of the plant. The Program agreement was scheduled to expire in 2023. However, the agreement was terminated in June 2020 due to a performance provision that automatically terminates the agreement for five

consecutive years of non-payment. In response to the Project being shut down, Beverly Hills has been continuously working on rehabilitating the plant and constructing improvements necessary to get the Project back online.

To date, Beverly Hills has: (1) conducted water quality testing and issued a final report in April 2017; (2) conducted a water plant pre-treatment pilot project and issued a report in June 2018; (3) commenced construction of plant rehabilitation, including a new raw water pre-treatment filtration system, plant upgrades and improvements; and (4) commenced construction of a new water transmission line and well to secure an additional source of groundwater from the La Brea Subarea Basin.



*THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA*
700 N. Alameda Street, Los Angeles, California 90012

10/12/2021 Board Meeting

Board Letter # 7-8

Adopt framework for amending Local Resources Program Agreements; Review and consider the City of Beverly Hills' approved Final Mitigated Negative Declaration and take related CEQA actions; and authorize the General Manager to reinstate and amend the existing Local Resources Program agreement for the Beverly Hills Desalter Project

**Attachment 2 – Initial Study and Negative Declaration For the City of Beverly Hills
Municipal Water and Public Works Facility Project**

These attachments are not included.

You may review these documents on our website at:
<http://mwdh2o.com/WhoWeAre/Board/Board-Meeting>

OR

By contacting Metropolitan's Board Executive Secretary at: (213) 217-6291
or via email at DL-BoardSupportTeam@mwdh2o.com

**INITIAL STUDY
AND **NEGATIVE DECLARATION** ***
**FOR THE
CITY OF BEVERLY HILLS MUNICIPAL WATER
AND
PUBLIC WORKS FACILITY PROJECT**

PREPARED FOR:

CITY OF BEVERLY HILLS
DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT
455 NORTH REXFORD DRIVE, ROOM G-40
BEVERLY HILLS, CALIFORNIA 90210-4817
(310) 285-1123

PREPARED BY:

JONES & STOKES ASSOCIATES, INC.
2151 MICHELSON DRIVE, SUITE 236
IRVINE, CALIFORNIA 92612

JUNE 1998

* **NEGATIVE DECLARATION PREPARED BY THE BEVERLY HILLS DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT**

**NEGATIVE DECLARATION**

Determination Number: **ER-20-12-97**

An application has been filed with the City of Beverly Hills for approval of the following project:

Name of Project: **Groundwater Development & Public Works Facility Project**

Project Address: **341 N. Foothill Road (Public Works Facility and Water Treatment Plant); Water Wells and Waterlines located various locations east of Rexford Drive, between Sunset Boulevard and Burton Way**

Name of Applicant: **City of Beverly Hills**

Project Description:

Development and utilization of three water wells (and utilization of fourth, existing well), water treatment plant, and pipelines connecting the wells, plant, and municipal water system. Also the development of 25,700 square-foot public works facility which would consolidate public works offices and shops located at various locations in the vicinity.

Pursuant to the authority and criteria contained in the California Environmental Quality Act (CEQA) and the CEQA Guidelines of the City of Beverly Hills, the Lead Agency has analyzed the project and determined that the project will not have a significant impact on the environment. Based on this finding, the Lead Agency prepared this Negative Declaration.

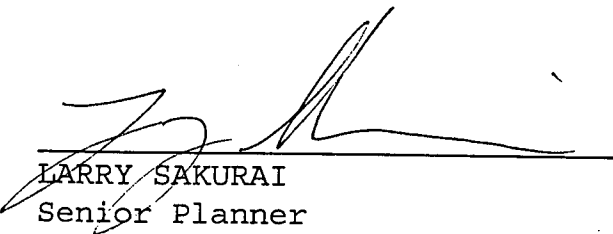
A copy of the Initial Study, documenting reasons to support the finding, is attached. Mitigation measures included in the project to avoid potentially significant effects are attached.

A period of at least 20 days from the date of publication of the notice of this **NEGATIVE DECLARATION** will be provided to enable public review of the project specifications, the Initial Study and this document prior to the final adoption of the **NEGATIVE DECLARATION** by the Lead Agency. A copy of the project application and plans is on file in the offices of Planning and Commu-

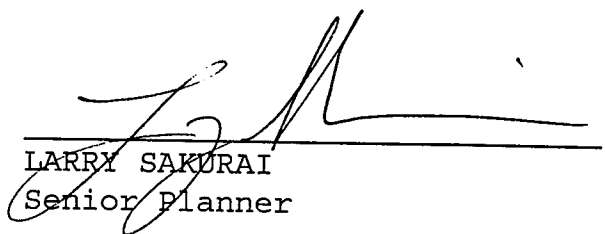
nity Development, 455 North Rexford Drive, Room G-40, Beverly Hills, California 90210 (310) 285-1123.

Prepared: June 26, 1998

Adopted: *AUGUST 11, 1998*
~~SEPTEMBER 11, 1998~~



LARRY SAKURAI
Senior Planner



LARRY SAKURAI
Senior Planner

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Environmental Checklist

1. Project Title:

Municipal Water Supply and Public Works Facility Project

2. Lead Agency Name and Address:

City of Beverly Hills
455 North Rexford Drive
Beverly Hills, CA 90210-4817

3. Contact Person and Phone Number:

Larry Sakurai, Senior Planner
(310) 285-1123
Fax (310) 858-5966

4. Project Location:

The proposed project is located in the City of Beverly Hills within Los Angeles County, California. Figure 1 illustrates the regional location of the proposed project. The proposed project includes a series of groundwater wells, all located within the Hollywood Groundwater Basin; a water treatment facility combined with City offices and other City facilities; and related water supply pipelines. Because of the nature of the project, the project area is not contained within a single site. Figure 2 shows the project vicinity and Figure 3 illustrates the locations of the individual project components.

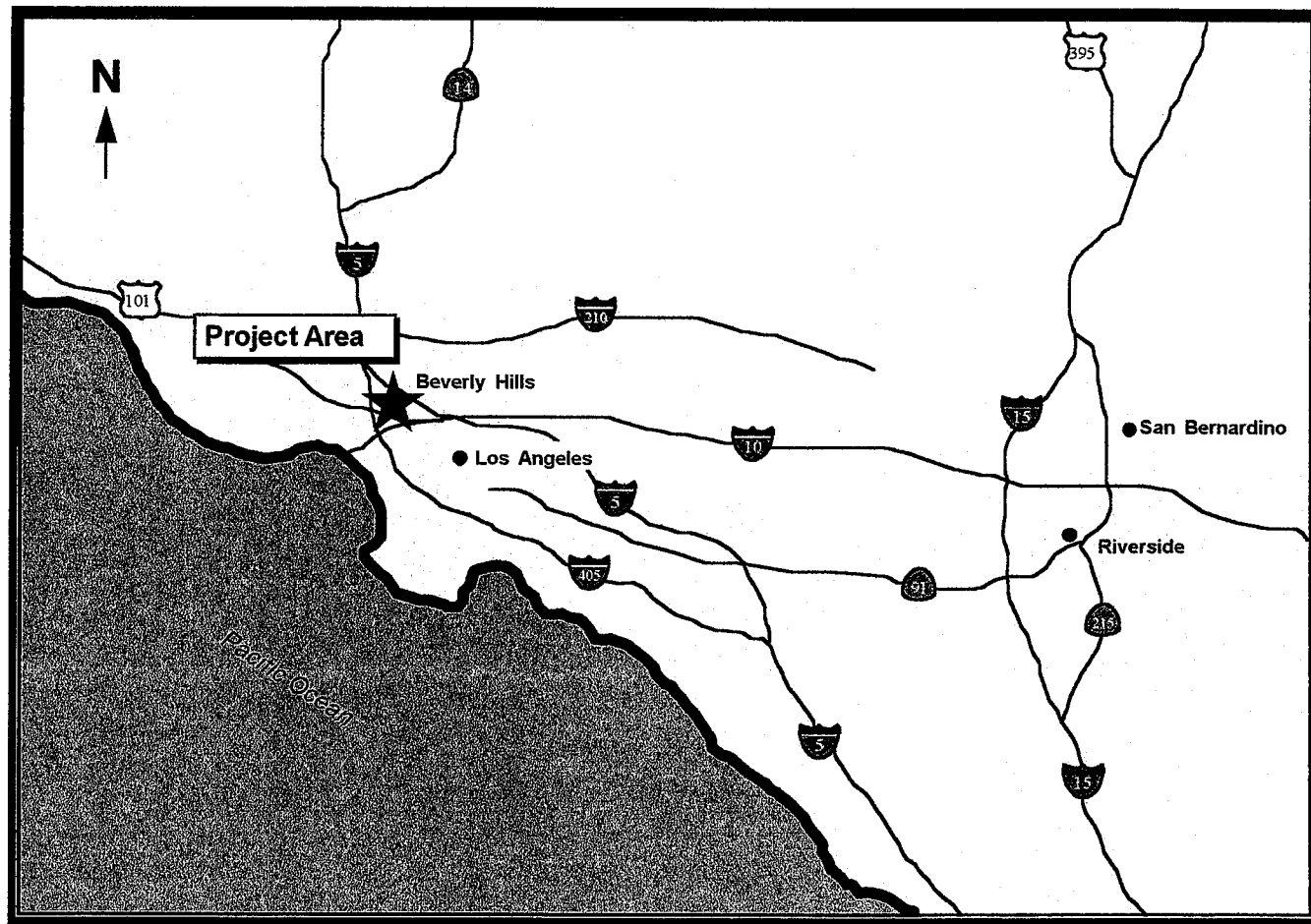
A total of four wells are proposed. The wells are proposed to be located:

- in the Burton Way median just west of its intersection with Foothill Road (existing well);
- in the Burton Way median just west of its intersection with Oakhurst Drive;
- in Civic Center Drive right-of-way, northeast of the Beverly Boulevard intersection; and
- in Beverly Gardens Park at Doheny Drive, bound on all sides by the streets Carmelita Avenue, Doheny Drive, Oakhurst Drive, and Santa Monica Boulevard.

Additionally, an alternate well site may be developed if the site within the Civic Center Drive right-of-way is deemed infeasible, which would be located:

- in Beverly Gardens Park between Palm Drive and Hillcrest Drive.

The proposed water treatment facility will be located at 341 North Foothill Road on City-owned property (currently the City Yard) between 3rd Street and Civic Center Drive. The facility will be combined with other City administration offices, shops, warehouse areas, and other facilities enclosed within an approximately 37,600 square

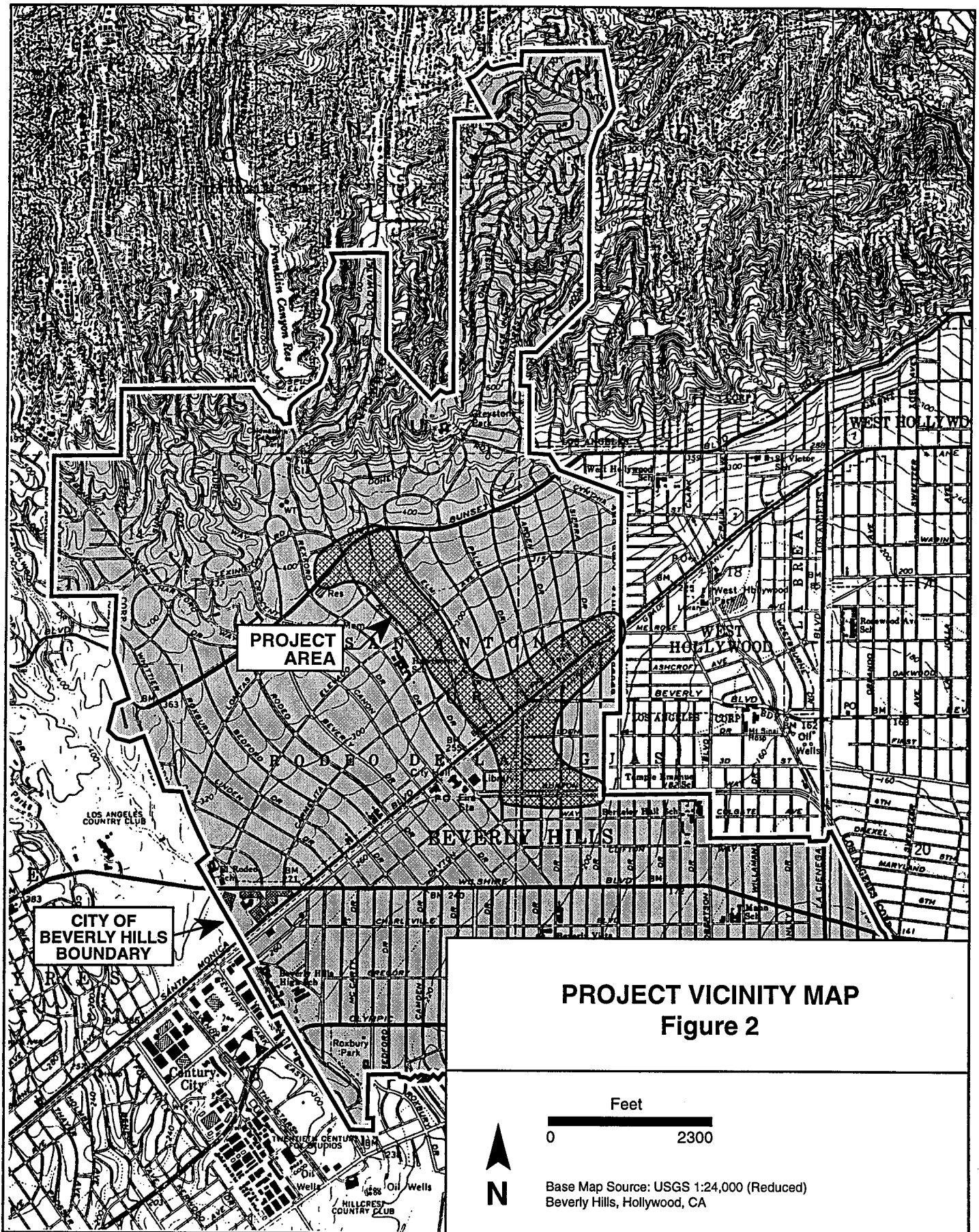


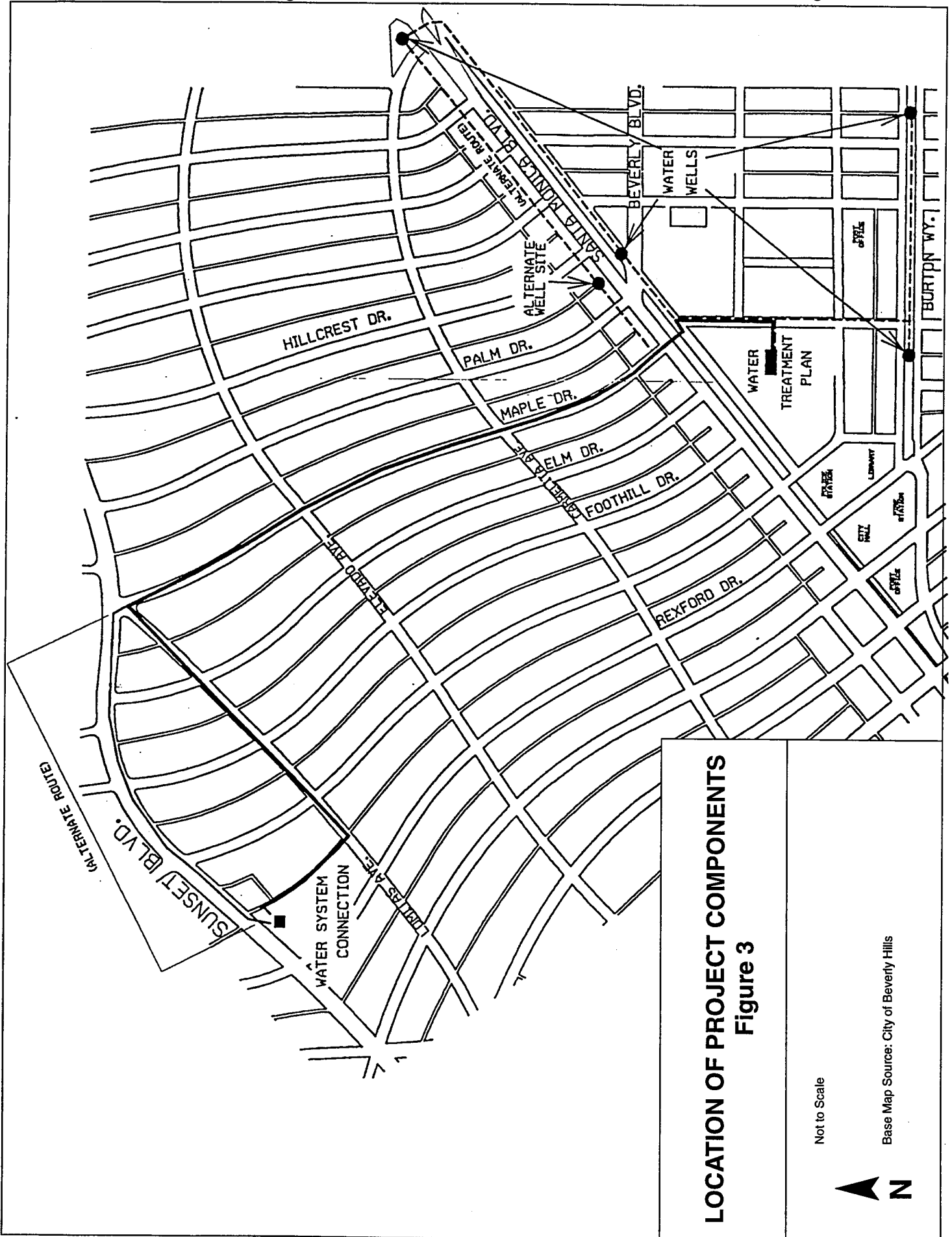
Not to Scale



Jones & Stokes Associates, Inc.

Figure 1
Regional Location





Environmental Checklist**2**

foot building. Several criteria were considered in the siting of the treatment plant:

- it must be located within a zone which is suitable for industrial operations such as a water treatment plant;
- the site must be far away from residential districts to avoid disturbance to local residences due to increased truck traffic; and
- the plant must be located as close as possible to the proposed water wells to avoid excessive length of pipelines from the wells to the treatment plant.

The proposed pipelines from the wells to the water treatment facility will roughly follow the Civic Center Drive, Burton Way, and Foothill Road. In the event that the alternate well site within Beverly Gardens Park is chosen, an alternate pipeline route will likely traverse through Beverly Gardens Park between the wells in Beverly Gardens Park (see Figure 2). The pipeline from the treatment plant to the connection with the water supply system would extend along Foothill Road, crossing Santa Monica Boulevard and continue northbound along Maple up to Lomitas Avenue, then westbound along Lomitas Avenue, and through the alley between Alpine Drive and Rexford north up to Sunset Boulevard, where the City's Metropolitan Water District connection is located. There is also an alternate route for this pipeline, which would extend directly from Maple Drive north to Sunset, and then west to the City's water system connection (see Figure 2).

5. Project Sponsor's Name and Address:

City of Beverly Hills
City Hall
455 North Rexford Drive
Beverly Hills, CA 90210-4817

6. General Plan Designation:

The General Plan Designations of the location of the project components are identified below. Because many of the project wells and pipeline facilities are located within circulation rights-of-way, the surrounding General Plan land use designations are identified.

Well sites: High Density Single Family Residential; High Density Multifamily Residential; Park; Scenic Highway

Pipelines: High Density Single Family Residential; High Density Multifamily Residential; Medium Density Single Family Residential; Park; Scenic Highway

Water Treatment Facility: Low Density General and Municipal (FAR 1.5 - 2.0)

7. Zoning:

The Zoning Designations of the location of the project components are identified below. Because the project wells and pipeline facilities are located primarily within circulation rights-of-way, the surrounding land use zoning designations are identified.

Well Sites: R-1 8X (Single Family Residential); R-4 (Multifamily Residential); R-1 X (Single Family Residential); T-1 (Transportation); Municipal Property

Pipelines: R-1 8X (Single Family Residential); R-4 (Multifamily Residential); R-1 X (Single Family Residential); T-1 (Transportation); Municipal Property

Water Treatment Facility: C-5 (Commercial); Municipal Property

Environmental Checklist**3****8. Description of Project:****Objectives and Need for the Proposed Project**

The City of Beverly Hills (City) is proposing to develop a municipal water project combined with a public works administration facility. The water development component includes utilizing groundwater to meet approximately 20 percent of the water demands of the City. Several circumstances have motivated the development of this groundwater supply project.

As a result of the extended drought in the late 1980's and early 1990's, the Public Works Commission was charged with development of water conservation programs which would meet the short-term goal of reduced water demand. In addition, the Commission recommended that the City staff rethink the development of groundwater resources for local water supply. In the intervening years following the extensive groundwater development program conducted by Boyle Engineering Corporation, a number of significant catastrophic events occurred, which reinforced the recommendation to move the project into reality.

The Northridge earthquake resulted in a significant part of the San Fernando Valley being without water for a week or more. All of Metropolitan Water District of Southern California's (Metropolitan's) imported water facilities cross numerous earthquake faults which could disrupt service for extended periods of time. The Oakland Hills fires were exacerbated by failures of reservoirs and pressure reducing equipment. The Malibu and Laguna fires required large volumes of water immediately to protect lives and property. Metropolitan pipeline failures resulted in the City being without Metropolitan's supply for seven days, causing the City of Beverly Hills to be dependent upon the City of Los Angeles' limited supply.

The local supply will provide for long-term protection against escalating Metropolitan water rates due to historic peaking off of Metropolitan supplies, and will save the City millions of dollars over a 20-year period; it will serve as an emergency supply in the event of loss or reduction of importable water; it will create an additional water supply to supplement fire suppression water reserves; it will provide a "cushion" in future drought cycles which may reduce imported supplies; and it will generally provide a more reliable source of water for residents of Beverly Hills and portions of West Hollywood.

The City of Beverly Hills provides domestic water within the City and in the western portion of the City of West Hollywood to a service area that includes approximately 4,010 acres, of which 3,646 acres are contained in the City of Beverly Hills. The proposed project includes drilling and pumping of three groundwater wells (and an alternate well site if the site in the Civic Center Drive right-of-way is deemed infeasible), and pumping from one existing well; construction of a new water treatment facility, offices, and other City facilities; and new pipelines between the wells, treatment facility, and the municipal water distribution system at Sunset Boulevard near Rexford Drive. In order to blend the product water with the municipal water supply, treatment is required that will remove salt; minerals, such as iron and manganese; and hydrogen sulfide (H₂S) from the extracted groundwater. The proposed project will be developed in two phases as discussed below.

Project Description**Phase I**

Phase I of the proposed project is to develop the wells and test the water produced by each well. The proposed well sites are all located within the Hollywood Groundwater Basin, and the locations of the specific sites are described above under "Project Location". The well in the Burton Way median near Foothill Road is the existing well that was constructed as part of a previous groundwater study and pilot testing performed by Boyle Engineering Corporation in 1996. Each of the other three wells would be developed to a depth of between 300 and 600 feet for

Environmental Checklist

4

test purposes. The alternate well site would be developed if the site within the Civic Center Drive right-of-way is deemed infeasible. The wells will be designed to function as production wells for future use if determined feasible following the testing of the pumped groundwater. The wellhead facilities would be subterranean with small venting and electrical service structures visible above ground.

The subterranean wellhead facilities would consist of:

- well pump, piping, electrical and telemetry equipment, contained within an enclosure;
- submersible pump;
- flush line connection to the storm drain system;
- electrical motor-activated butterfly valves with control logic for the flush line and the connection to the collection system;
- telemetry and control equipment, which will interface with the treatment plant via direct buried fiber optic cable to be installed in the collector pipeline trend;

Above grade facilities would consist of the following:

- six-inch air vent about 7.5 feet high;
- electrical pedestal (18 inches square, 4 feet high) will contain the electric meter and main disconnect switch to allow meter to be read without entering the vault, and provide a means for disconnecting the electrical equipment from the utility supply; and
- well vent which will be 30-inch diameter and 5 feet high. This will be within the same enclosure as the flush line connection to the storm drain.

Well field production would be limited to the safe annual yield of the local aquifers. Data gathered from comparing historical pumpage and groundwater level data, in addition to previous studies, suggest a safe yield of approximately 3,000 acre-feet per year. Each well is anticipated to be capable of drawing approximately 450 gallons of water per minute (gpm) when in service. However, there may be brief periods, such as during summer months, that the well pumping may increase above a constant, uniform pumping rate that is maintained year-round.

Construction of the test/production wells will be accomplished utilizing two forms of rotary drilling. The direct rotary drilling will be used to advance an approximate 30-inch-diameter hole to a depth of at least 50 feet for installation of 24-inch-diameter conductor casing. Drilling of the final well casing borehole will be completed in two phases utilizing the reverse rotary drilling method. Initially a small diameter (approximately 8-inch) pilot hole will be drilled to a depth of approximately 850 feet below land surface in order to determine lithology and water quality within the production zone as well as above and below the production zone. Approximately four intervals will be isolated and sampled for water quality analyses.

Two phases of pump testing will be completed to determine well performance characteristics, water quality, and estimations of aquifer hydraulic coefficients. The wells will be pumped at five discrete rates for a period of 1 hour per step and resultant water level drawdowns will be recorded. The last and highest rate will be approximately 125 to 150 percent of anticipated production rate. Once installation and testing of the production pump is complete, the well will be pumped at a constant discharge rate for at least 24 hours. The pilot hole will later be reamed to a nominal diameter of 23 inches for production if determined feasible following the testing.

Following the development and construction of the wells and wellhead facilities, the sites will be landscaped.

Environmental Checklist**5****Phase II**

Phase II of the proposed project consists of the construction of a water treatment plant in conjunction with a public works facility at the existing City Yard at 341 North Foothill Drive, between 3rd Street and Civic Center Drive. This phase includes the construction of an approximately 37,600 square foot building encompassing approximately 8,000 square feet (sf) of administration space, approximately 8,000 sf of public areas on the first floor, approximately 6,080 sf of shops for public works activities, approximately 3,620 sf of warehouse (to be located on the second floor above the shops), and the water treatment facility would constitute approximately 11,900 sf of space on the first floor.

This phase also includes the construction of pipelines connecting the wells to the treatment facility (raw water pipelines), and pipelines from the treatment facility to the municipal water distribution system (product water pipelines). The proposed product water pipelines will roughly follow the Civic Center Drive, Burton Way, and Foothill Road between the well sites (see Figure 2). However, if the alternate well site in Beverly Gardens Park is developed, rather than the pipelines being developed in Civic Center Drive, the raw water pipelines would traverse Beverly Gardens Park between the two well sites within the Park.

The proposed treatment plant would be sized to deliver a product water flow rate of approximately 3.5 million gallons per day (mgd), with the capacity to treat up to 5 mgd to allow for future expansion. However, the safe annual yield of 3,000 acre-feet would be maintained over the 12-month period. The treatment plant will require 24-hour staffing by 4 persons per shift to operate the plant. Although most processes are automatic and controlled by computers, the control room and some equipment would require continuous observation by qualified operators. An in-plant laboratory would be included at the facility to test daily or weekly samples for general minerals, general physical, and basic bacterial analyses. Complicated analyses such as organics and heavy metals will be contracted to an outside laboratory.

The treatment plant would consist of a series of pumps, membrane modules, filters, chemical storage facilities, and other equipment housed in an open approximately 11,900-square-foot enclosure. A reverse osmosis (RO) process is proposed to treat the water. The treatment of groundwater will require the storage and utilization of several hazardous chemicals, including concentrated sulfuric acid, caustic soda, chlorine, and scale inhibitor.

Following treatment, it is anticipated that approximately 87 percent (based on previous studies) of the water would then be sent via a 16-inch product water pipeline to a connection near Sunset Boulevard and Rexford Drive, where it would be blended with water from Metropolitan. The product water pipeline would extend along Foothill Road, crossing Santa Monica Boulevard, and continue northbound along Maple up to Lomitas Avenue. It would then turn westbound and extend along Lomitas Avenue. The pipeline would then turn north again to extend up to Sunset Boulevard, where the City's Metropolitan Water District connection is located, through the alley between Alpine Drive and Rexford Drive. There is also an alternate route for this product water pipeline, which would generally follow the same route until it reaches the intersection of Maple Drive and Lomitas Avenue. At this intersection, the alternate product water pipeline would continue to extend north along Maple Drive to Sunset, and then west to the City's water system connection (see Figure 2).

The remaining approximately 13 percent of the water would consist of brine that would contain most of the dissolved minerals removed from the treated water by the RO process. It would be discharged into the storm drain system at a concentrated flow rate of 0.3 mgd. A National Pollutant Discharge Elimination System (NPDES) permit will be required from the Regional Water Quality Control Board for the disposal of the brine. This permit will be applied for an approved prior to development of the water treatment facility. Air stripping will be implemented to remove hydrogen sulfide (resulting from H₂S concentrations in the local groundwater) from both the treated water and the brine following the RO process. The removal of iron and manganese, in addition to the air stripping process, produces a residual sludge that will be disposed of in land-fills.

Environmental Checklist

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In order to reduce any potentially significant impacts associated with the proposed project, the mitigation measures have been incorporated into the project design. These mitigation measures are presented in the respective sections of the Environmental Evaluation and Annotated Discussion of Impacts, as well as being summarized at the end of this Initial Study.

9. Surrounding Land Uses and Setting:

Surrounding land uses adjacent to the existing and proposed wells and raw water pipelines along Burton Way include high-density multifamily residential uses along the north side of Burton Way, and high-density single-family residential uses to the south. High-density multifamily residential uses also exist in the area to the south of the proposed well site and raw water pipeline alignments that would be located within the Civic Center Drive right-of-way. Just north of the proposed well site and pipelines within Civic Center Drive and between Civic Center Drive and Santa Monica Boulevard, lies a strip of land that includes the railroad right-of-way. Beverly Gardens Park is located along the north side of Santa Monica Boulevard, which is the proposed location for the other well site. The alternate well may also be located within Beverly Gardens Park. In the event that the alternate well site is implemented, the alternate raw water pipeline alignment would also extend through the Park.

The proposed water treatment facility and offices are located within the Industrial Area, which is characteristic of light industrial and other municipal uses. The City Yard and a Southern California Edison electric substation lie directly south, a veterinary office is located adjacent to the proposed site directly to the north, and the City's existing Public Works Department is located directly across Foothill Road to the east. Other uses along Foothill Road in the vicinity of the proposed treatment facility and related pipelines include other municipal uses, offices, a record studio, commercial and industrial uses, and vacant properties.

The proposed product water pipeline that extends from the treatment facility to the Metropolitan and City supply connection passes through residential streets and alley-ways that are located adjacent to medium-density single-family residential land uses.

10. Other agencies whose approval is required:

Los Angeles Regional Water Quality Control Board (LARWQCB)
California Department of Health Services (CDHS)
Los Angeles County Department of Public Works (LACDPW)

11. Initial Study and Checklist:

The purpose of an Initial Study (IS) is to determine if the proposed project could result in significant adverse unavoidable effects on the environment and to recommend the appropriate environmental clearance document. The IS is a public document that analyzes the environmental effects of the proposed project and presents feasible measures when applicable to reduce or avoid potential environmental damage. It is not the purpose of the IS to recommend approval or denial of the project. The following IS has been prepared to assess the impacts of the City of Beverly Hills Municipal Water and Public Works Facility Project as required by the California Environmental Quality Act (CEQA).

Environmental Checklist

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Environmental Factors Potentially Affected:

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

<input type="checkbox"/>	Land Use and Planning	<input checked="" type="checkbox"/>	Transportation/Circulation	<input type="checkbox"/>	Public Services
<input type="checkbox"/>	Population and Housing	<input type="checkbox"/>	Biological Resources	<input checked="" type="checkbox"/>	Utilities & Service Systems
<input checked="" type="checkbox"/>	Geological Problems	<input type="checkbox"/>	Energy & Mineral Resources	<input checked="" type="checkbox"/>	Aesthetics
<input checked="" type="checkbox"/>	Water	<input checked="" type="checkbox"/>	Hazards	<input checked="" type="checkbox"/>	Cultural Resources
<input checked="" type="checkbox"/>	Air Quality	<input checked="" type="checkbox"/>	Noise	<input type="checkbox"/>	Recreation
		<input type="checkbox"/>	Mandatory Findings of Significance		

Determination.

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described on an attached sheet have been added to the project. 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 significant effect(s) 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, if the effect is a "potentially significant impact" or "potentially significant unless mitigated." 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, there WILL NOT be a significant effect in this case because all potentially significant effects (a) have been analyzed adequately in an earlier EIR pursuant to applicable standards and (b) have been avoided or mitigated pursuant to that earlier EIR, including revisions or mitigation measures that are imposed upon the proposed project.

Signature

Date

Printed Name

Environmental Checklist**8****Issues (and Supporting Information Sources):****I. LAND USE AND PLANNING.** Would the proposal:

- a. Conflict with general plan designation or zoning?
- b. Conflict with applicable environmental plans or policies adopted by agencies with jurisdiction over the project?
- c. Be incompatible with existing land use in the vicinity?
- d. Affect agricultural resources or operations (e.g., impacts to soils or farmlands, or impacts from incompatible land uses)?
- e. Disrupt or divide the physical arrangement of an established community (including a low-income or minority community)?

Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
			X
			X
		X	
			X
			X

II. POPULATION AND HOUSING. Would the proposal:

- a. Cumulatively exceed official regional or local population projections?
- b. Induce substantial growth in an area either directly or indirectly (e.g. through projects in an undeveloped area or extension of major infrastructure)?
- c. Displace existing housing, especially affordable housing?

			X
			X
			X

III. GEOLOGIC PROBLEMS. Would the proposal result in or expose people to potential impacts involving:

- a. Fault rupture?
- b. Seismic ground shaking?
- c. Seismic ground failure, including liquefaction?
- d. Seiche, tsunami, or volcanic hazard?
- e. Landslides or mudflows?
- f. Erosion, changes in topography or unstable soil conditions from excavation, grading, or fill?
- g. Subsidence of the land?
- h. Expansive soils?
- i. Unique geologic or physical features?

		X	
	X		
	X		
			X
			X
		X	
		X	
			X
			X

IV. WATER. Would the proposal result in:

- a. Changes in absorption rates, drainage patterns, or the rate and amount of surface runoff?
- b. Exposure of people or property to water related hazards such as flooding?
- c. Discharge into surface waters or other alteration of surface water quality (e.g. temperature, dissolved oxygen or turbidity)?
- d. Changes in the amount of surface water in any water body?
- e. Changes in currents, or the course or direction of water movements?

		X	
		X	
	X		
		X	
			X

Environmental Checklist

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Issues (and Supporting Information Sources):

- f. Change in the quantity of ground water, either through direct additions or withdrawals, or through interception of an aquifer by cuts or excavations, or through substantial loss of groundwater recharge capability?
- g. Altered direction or rate of flow of groundwater?
- h. Impacts to ground water quality?
- i. Substantial reduction in the amount of groundwater otherwise available for public water supplies?

Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
		X	
		X	
		X	
		X	

V. AIR QUALITY. Would proposal:

- a. Violate any air quality standard or contribute to an existing or projected air quality violation?
- b. Expose sensitive receptors to pollutants?
- c. Alter air movement, moisture, or temperature, or cause any change in climate?
- d. Create objectionable odors?

	X		
		X	
			X
		X	

VI. TRANSPORTATION/CIRCULATION. Would the proposal result in:

- a. Increased vehicle trips and traffic congestion?
- b. Hazards to safety from design features (e.g., sharp curves or dangerous intersection) or incompatible uses (e.g., farm equipment)?
- c. Inadequate emergency access or access to nearby uses?
- d. Insufficient parking capacity on-site or off-site?
- e. Hazards or barriers for pedestrians or bicyclists?
- f. Conflicts with adopted policies supporting alternative transportation (e.g., bus turnouts, bicycle racks)?
- g. Rail, waterborne or air traffic impacts?

		X	
		X	
	X		
		X	
	X		
			X
			X

VII. BIOLOGICAL RESOURCES.

Would the proposal result in impacts to:

- a. Endangered, threatened, or rare species or their habitats (including but not limited to plants, fish, insects, animals, and birds)?
- b. Locally designated species (e.g., heritage trees)?
- c. Locally designated natural communities (e.g., oak forest, coastal habitat, etc.)?
- d. Wetland habitat (e.g., marsh, riparian, and vernal pool)?
- e. Wildlife dispersal or migration corridors?

			X
			X
			X
			X
			X

Environmental Checklist

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Issues (and Supporting Information Sources):

Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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VIII. ENERGY AND MINERAL RESOURCES.

Would the proposal:

- a. Conflict with adopted energy conservation plans?
- b. Use non-renewable resources in a wasteful and inefficient manner?
- c. Result in the loss of availability of known mineral resources that would be of future value to the region and the residents of the State?

		X	
		X	
			X

IX. HAZARDS. Would the proposal involve:

- a. A risk of accidental explosion or release of hazardous substances (including, but not limited to: oil, pesticides, chemicals, or radiation)?
- b. Possible interference with an emergency response plan or emergency evacuation plan?
- c. The creation of any health hazard or potential health hazard?
- d. Exposure of people to existing sources of potential health hazards?
- e. Increased fire hazard in areas with flammable brush, grass, or trees?

	X		
		X	
	X		
		X	
			X

X. NOISE. Would the proposal result in:

- a. Increases in existing noise levels?
- b. Exposure of people to severe noise levels?

	X		
	X		

XI. PUBLIC SERVICES. Would the proposal have an effect upon, or result in a need for new or altered government services in any of the following areas:

- a. Fire protection?
- b. Police protection?
- c. Schools?
- d. Maintenance of public facilities, including roads?
- e. Other governmental services?

		X	
		X	
			X
		X	
		X	

XII. UTILITIES AND SERVICE SYSTEMS. Would the proposal result in a need for new systems or supplies, or substantial alterations to the following utilities:

- a. Power or natural gas?
- b. Communications systems?
- c. Local or regional water treatment or distribution facilities?
- d. Sewer or septic tanks?
- e. Storm water drainage?
- f. Solid waste disposal?
- g. Local or regional water supplies?

	X		
	X		
		X	
	X		
		X	
		X	
		X	

Environmental Checklist

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Issues (and Supporting Information Sources):

Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------------------------	--	------------------------------------	--------------

XIII. AESTHETICS. Would the proposal:

- a. Affect a scenic vista or scenic highway?
- b. Have a demonstrable negative aesthetic effect?
- c. Create light or glare?

		X	
		X	
		X	

XIV. CULTURAL RESOURCES. Would the proposal:

- a. Disturb paleontological resources?
- b. Disturb archaeological resources?
- c. Affect historical resources?
- d. Have the potential to cause a physical change which would affect unique ethnic cultural values?
- e. Restrict existing religious or sacred uses within the potential impact area?

	X		
	X		
		X	
			X
			X

XV. RECREATION. Would the proposal:

- a. Increase the demand for neighborhood or regional parks or other recreational facilities?
- b. Affect existing recreational opportunities?

		X	
		X	

XVI. 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?
- b. Does the project have the potential to achieve short term, over the disadvantage of long-term, environmental goals?
- c. 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, effects of other current projects, and the effects of probable future projects.)
- d. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

			X
			X
			X
			X

Environmental Evaluation and Discussion of Impacts

This section of the Initial Study provides discussions of the environmental resource issues and potential impacts as identified on the preceding checklist. A discussion of the alternate well site and the alternate product water pipeline route are also presented as they are applicable. Impacts would be the same for these alternate facilities and alignments unless otherwise noted.

I. LAND USE AND PLANNING

- a. The proposed project does not conflict with general plan designations or zoning. The proposed groundwater well sites and related pipelines are located on City-owned property and within public circulation rights-of-way. Those well sites within public rights-of-way are not designated under the General Plan or Zoning Code. However, the proposed well site and the alternate well site that are located in Beverly Gardens Park are designated as Park use. Provisions for public infrastructure are not subject to general plan designations or zoning regulations. Section 10-3.2754 of Article 20 of the City's Zoning Code (Commercial Zone [C-5]) suggests that "nothing shall restrict the installation of public utility distribution facilities in a public right-of-way". The proposed groundwater wells and pipelines would be compatible within any land use designation throughout the City. No impacts are anticipated.

The site of the proposed water treatment facility is within an area designated Low Density General and Municipal, which falls within the jurisdiction of the City of Beverly Hills Industrial Area Plan. Land use designations are generally consistent throughout the area, providing for the development of commercial office space within a zone designated C-5, and municipal services facilities in a zone designated P-S. The City devotes 20 percent of the Industrial Area to municipal land uses (Industrial Area Plan 1994), including the public works and treatment facility site, which is zoned P-S, allowing for the development of municipal facilities. Therefore, the proposed treatment facility site is compatible with the General Plan and zoning, and does not result in significant impacts.

- b. The project falls under the jurisdiction of several applicable plans and policies of the City of Beverly Hills. These include the City of Beverly Hills General Plan, the City of Beverly Hills Industrial Area Plan, and the Water System Master Plan.

The proposed project partially includes development of groundwater wells that are located within Beverly Gardens Park and within the Civic Center Drive right-of-way (ROW) along both sides of Santa Monica Boulevard. Santa Monica Boulevard is designated as a Scenic Highway in the City of Beverly Hills General Plan. The objective of the element is to preserve and enhance aesthetic resources within the scenic corridors and assure that the resources is protected for the future. If the State

(California Department of Transportation) were to adopt the City's designation and standards, then Santa Monica Boulevard would receive protection of a scenic highway (City of Beverly Hills General Plan, Scenic Highway Element, 1976). However, at this time there are no policies on scenic highways in Beverly Hills, and therefore the proposed wells are compatible with the General Plan.

The proposed product water pipeline that extends to the Metropolitan and City water supply connection would be located within streets, as well as partially within the alley north of Lomitas Avenue. The Circulation Element of the General Plan identifies one of the roles of the alleys as serving as the primary network for utility locations by permitting a higher degree of efficiency and visual quality along the streets (City of Beverly Hills General Plan, Circulation Element 1977). Placement of the pipeline within the alleys would be compatible with the General Plan, and therefore a significant impact would not result.

Implementation of the Land Use Element of the General Plan recommends that, "alternative locations and criteria should be explored for possible relocation out of the area or consolidation within the area of the existing public service facilities located in the Industrial Area" (City of Beverly Hills General Plan, Land Use Element 1977). The proposed project conforms to this implementation measure by attempting to eliminate potential impacts that may occur by otherwise siting the treatment facility near residential land uses. The proposed public works and water treatment facility will in fact be located within the Industrial Area of the City. Additionally, the project includes the combination of public works offices and shops with the proposed water treatment facility to further consolidate these city functions. Significant land use impacts would not result.

The Conservation Element of the General Plan suggests measures to, "provide a stable, economical supply of potable water while retaining the City's option to tap into existing groundwater supplies should it become necessary or desirable to replace or supplement the City's supply; and to retain the capability to treat locally extracted water, should it be determined that the local groundwater resources are to be utilized" (City of Beverly Hills General Plan, Conservation Element 1979). The proposed project implements this portion of the General Plan, and therefore does not result in a significant impact.

- c. The proposed project may not be compatible with existing land uses in the vicinity of some project components. When considering the compatibility of land uses, usually nuisance factors are taken into account with the siting of new projects. For additional discussion of compatibility issues, please refer to the Noise, Air Quality, and Aesthetics sections of this Initial Study. General discussions of land use compatibility are presented below.

Environmental Analysis and Discussion of Impacts

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With respect to the Burton Way well sites, high density multi-family residential uses line the north side of Burton Way, and high density single-family residential uses are located to the south. However, as the wells would be located roughly within the center of the median, the public ROW and automobile circulation would provide a buffer between the residential land uses and the groundwater wells. Thus any impacts resulting from potential noise or other possible nuisance factors would be substantially lessened as a result of the existing site conditions.

The nearest sensitive receptors from the proposed well site within the Civic Center Drive ROW at the intersection with Beverly Boulevard is high density multi-family residential uses that are located directly to the east. The construction of this well site and related pipelines may result in short-term nuisance impacts to the adjacent residents in the way of noise, visual impacts, and immediate fugitive dust impacts during construction. However, due to the heavy traffic near the intersection and along Santa Monica Boulevard, it is not expected that potential impacts would be substantially greater than the existing conditions for the area.

The well site proposed in Beverly Gardens Park at the Doheny site, which is the northeastern most portion of Beverly Gardens Park, is surrounded on all sides by streets. Located at the intersection of Doheny Drive and Santa Monica Boulevard, the area currently experiences high-traffic volumes due to the substantial commercial areas located to the south and east. Medium-density single-family residential land uses lie to the north and west beyond Oakhurst Drive and Carmelita Avenue. Due to the existing high traffic in the area, the buffering streets and the Park, residential areas are not anticipated to be impacted by the proposed groundwater well. However, due to the integrity of the Park as a valuable open space resource, a groundwater well may be considered to be an invasive land use within the Park to local users. Aesthetically, the groundwater well would be located underground with only minimal surface facilities exposed. Because these facilities would be landscaped and mostly concealed, no significant compatibility impacts are anticipated.

The product water pipeline would be located within residential streets and portions of an alley surrounded by medium density single-family residential land uses. Public infrastructure and utilities are not considered to be incompatible with residential land uses. However, temporary short-term impacts to adjacent residents associated with noise, aesthetics, and circulation access may occur during construction and are discussed in the respective sections of this Initial Study. No significant land use impacts associated with the proposed pipelines are anticipated.

The proposed public works facility and water treatment plant is located within the Industrial Area of the City. Surrounding uses in the area consist of commercial and industrial offices, commercial-retail/service, utilities, a veterinary hospital, and other

municipal land uses. According to the City of Beverly Hills Industrial Area Plan, the existing uses and the proposed facility are considered compatible land uses, and therefore a significant land use impact would not result. However, due to the nature of the facility and the 24-hour operations of the treatment processes, some adjacent land uses may express concern of the compatibility of the treatment plant in the area. The design of the treatment plant and office facility will take into consideration potential noise impacts and other compatibility issues to ensure that no impacts occur to adjacent land uses. Extensive acoustic treatment, including vibration isolation, would be implemented. Additionally, all potentially hazardous materials will be handled in compliance with applicable laws to ensure that safety is not unduly compromised. No significant impacts are anticipated.

Alternate Well Site

The alternate well site would be located within Beverly Gardens Park along Santa Monica Boulevard between Hillcrest Drive and Palm Drive. If this site is chosen, land use compatibility impacts may occur due to the proximity of neighboring medium-density single-family residential land uses. Although an approximately 7-foot block wall exists separating the Park from the residential land uses, short-term construction activities may create nuisance impacts to these residents. The existing high traffic volume along Santa Monica Boulevard coupled with the existing block wall, however, would serve as buffers from significant impacts occurring. Measures to reduce any potential impacts would also be implemented as outlined in the following respective Noise, Aesthetics, and Air Quality sections.

Alternate Pipeline Route

The alternate product water pipeline route would generally follow the same route as the proposed product water pipeline up to the intersection of Maple Drive and Lomitas Avenue. At this intersection, rather than extending west down Lomitas Avenue and then north in the alley between Rexford Drive and Alpine Avenue, the pipeline would continue north along Maple Drive up to Sunset Boulevard, and then west to the Metropolitan Water District of Southern California's (Metropolitan's) municipal water supply connection. It is expected that this alternate pipeline route would produce similar compatibility issues as the proposed pipeline route due to the residential character of the area. However, impacts may be slightly less as the pipeline would not be constructed in the alley, which would be more intrusive to the adjacent residents. Additionally, fewer residences would be affected by short-term construction impacts as Sunset Boulevard contains fewer residents, and experiences a substantially larger volume of traffic than Lomitas Avenue. Thus, it is expected that this alternate product water pipeline route would create fewer land use impacts than the proposed pipeline route.

- d. The proposed project would not affect agricultural resources or operations. No agricultural land uses exist within the vicinity of the proposed project, therefore, no

Environmental Analysis and Discussion of Impacts

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impacts are anticipated.

- e. The proposed project would not disrupt or divide the physical arrangement of an established community. The scale of the proposed project would not have the capability to disrupt the physical arrangement of the community. No impacts are anticipated.

II. POPULATION AND HOUSING

- a,b. The proposed project would not cumulatively exceed official regional or local population projections. The service area, including the City of Beverly Hills and the western portion of the City of West Hollywood, has nearly reached full development and is expected to reach an ultimate population of only 51,830 (City of Beverly Hills, Water System Master Plan, 1985). The proposed project is not expected to contribute to population growth, but rather attempts to supplement the existing water from Metropolitan with a more reliable and less expensive water supply.

The proposed project is not expected to induce substantial growth in the area either directly or indirectly. Although the proposed project would develop a water supply with increased capacity, it is not expected to be growth inducing. As the service area is mostly built-out, the proposed municipal water supply project's intent is to accommodate the existing population by supplementing 20 percent of the existing Metropolitan water supply with local groundwater. Currently, the City and the surrounding service area is completely reliant upon the Metropolitan supply. The purpose of the proposed project is to develop a more reliable water supply for the service area, and to reduce the cost associated with peaking charges from Metropolitan; not to expand the service area, or the capacity of the water supply system in the area. Currently, the service area could be adequately served by existing Metropolitan supplies. However, it is the goal of the City, as well as Metropolitan, to develop a supplemental source of water to supply local customers. No significant population impacts are anticipated.

- c. The proposed project would not displace existing housing. The proposed project does not include the displacement of housing for the construction of the project elements. Therefore, no significant housing impacts are anticipated.

III. GEOLOGIC PROBLEMS

The City of Beverly Hills is located in the northwest portion of the Los Angeles Coastal Plain. The City overlies portions of the Santa Monica, Hollywood and Central Groundwater Basins. The major structural features in the study area consist of the Hollywood fault, located

Environmental Analysis and Discussion of Impacts

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along the northern boundary of the Hollywood Groundwater Basin, the Santa Monica Fault extending east-west across the southern end of the City, and the Newport-Inglewood Zone of Deformation (City of Beverly Hills, Geotechnical Report 1987). High groundwater levels in the City increase the probability of liquefaction during seismic activity (City of Beverly Hills, General Plan, Seismic Safety Element 1975). The three dominant potential seismic hazards that affect the City are ground shaking, ground breakage due to faulting, and soil liquefaction (City of Beverly Hills, Geotechnical Report 1987). The potential impacts associated with seismic hazards are presented below.

a. **Fault Rupture**

Fault rupture is caused by the actual breakage of the ground surface overlying a fault in the event of seismic activity. This can range in offsets from less than one inch up to twenty feet depending on the fault and earthquake magnitude. Impacts resulting from fault rupture generally occur within the immediate vicinity overlying the fault. Although the local faults are not within a special Alquist-Priolo Special Study Zone, this does not preclude the faults from serving as a potential seismic hazard. This may merely be due to the lack of evidence that exists along the surface. Additionally, there are uncertainties in the precise locations of these faults, which may be the reason for the range in the caution zones established. The two wells along Burton Way lie in a caution zone for fault rupture hazards from the Santa Monica Fault (City of Beverly Hills Geotechnical Report 1987). With the exception of potential occasional maintenance activities, the well facilities would not be inhabited. While this may be of minor concern to the City, the project would not result in a significant increase in exposure to fault rupture hazards.

b. **Ground Shaking**

Southern California is a seismically active region and prone to earthquakes, which may result in hazardous conditions to people within the region. Earthquakes and ground motion can affect a wide-spread area. Nineteen individual faults or fault zones within 50 miles of the area, including the three local faults, are capable of generating earthquakes of Richter magnitude 6.25 to 8.5 (City of Beverly Hills Industrial Area Plan Draft EIR 1990). The potential severity of ground shaking depends on many factors, including the distance from the originating fault, the earthquake magnitude and the nature of the earth materials beneath the site. The most serious impacts associated with ground shaking would occur if the structures were not properly constructed according to seismic engineering standards. Buildings have been designed to withstand strong earthquakes. The proposed building and structures will adhere to the applicable building codes and undergo engineering checks in compliance with State and City standards. These necessary compliance strategies will reduce potentially significant impacts to less than significant levels.

c. **Liquefaction**

The potential for liquefaction depends on the levels of shaking, groundwater conditions, the relative density of the soils, and the age of the geologic units. Seismic-induced liquefaction occurs when a saturated, low relative density granular deposit is subject to extreme shaking and loses strength or stiffness due to increased pore water pressure. The Geotechnical Report prepared by Woodward-Clyde (1987) identifies the areas covered by the proposed project elements as being across very low- to high-potential areas. Although precise boundaries for liquefaction zones are not certain, the general boundaries are discussed below.

The public works facility and most of the pipelines would be located within Zone C (low potential). It appears that the wellhead facilities in Burton Way and in Beverly Gardens Park would be located within Zone B (moderate potential). However, the well to be located in the Civic Center Drive ROW would be within liquefaction Zone A (high potential). This high potential area may be due to the shallow groundwater levels and relatively younger sediments (City of Beverly Hills 1987). The consequences of liquefaction are expected to be predominantly characterized by settlement, uplift on structures and increase in lateral pressure on buried structures. If not designed properly the effects of severe liquefaction during seismic conditions could produce failure of building foundations leading to substantial structural damage and injury or loss of life. Significant impacts are not anticipated as the public works facility is located within a low potential liquefaction zone. The other well head facilities would not be inhabited with the exception of occasional maintenance activities. However, seismic safety standards will be adhered to in building engineering and design, which will mitigate any potential impacts to less-than-significant levels.

Even though the public works facility site is located within a low potential liquefaction zone, there is a potential for liquefaction impacts because the precise boundaries are not known. The Industrial Area Plan Draft EIR (1990) suggests that site-specific studies should be conducted to determine specific groundwater level, liquefaction consequences, level of damage and level of risk prior to construction of major facilities in the Industrial Area. The effects of liquefaction can be mitigated to less-than-significant levels. However, the potential hazards associated with liquefaction must first be identified. Depending on the severity of the potential for liquefaction to occur, some or all of the mitigation measures presented below could be implemented. A geotechnical study is currently being prepared to identify potential geotechnical hazards and recommend sound construction measures. Any geotechnical recommendations will be incorporated into the project design and adhered to during the construction of the facility. Implementation of these measures will ensure that a less-than-significant impact results.

Mitigation Measures

- MM III-1. Use of driven pile foundations may mitigate settlements; piling should be designed for downdrag loads imposed by settlement of soil.*
- MM III-2. Underground elements of substructures can be designed for increased lateral pressure and uplift pressure caused by liquefaction.*
- MM III-3. Where appropriate, in-place densification techniques such as: vibroflotation, dynamic compaction, combined densification/drainage (compaction piles), and vertical drains (stone columns) may be used to improve subsurface soil stability.*

- d, e. The proposed project would not expose people to seiches, tsunamis, landslides, mudflows, or volcanic hazards. These hazards do not exist in the vicinity of the project site, and would therefore not have the potential to result in exposure to such hazardous conditions. No impacts are anticipated.
- f. The proposed project may result in erosion impacts during the construction phase of the proposed project. Excavation of the wells, and grading activities during construction of the public works facility and pipelines could result in temporary, short-term erosion impacts. Although excavated material and debris would be retained on-site and eventually hauled off-site during drilling and excavation of the well sites, there is a potential for erosion to occur offsite as a result of construction vehicles entering and exiting the site. Additionally, potential precipitation could result in erosion occurring offsite.

During the drilling phases of the project, water containing mud and other sedimentary materials could erode the immediate sites and discharge offsite. However, measures have been incorporated into the project to divert muddy water resulting from well drilling and pumping to the storm drain system to avoid erosion impacts off-site. Short-term erosion impacts associated with construction of the treatment plant and pipelines would be negligible and would not be considered significant.

As part of the project, the following mitigation measures would be implemented to further reduce off-site erosion impacts to less-than-significant impacts:

Mitigation Measures

- MM III-4. During construction phases, the contractor will implement wheel washing for trucks and other construction equipment prior to the equipment and vehicles exiting the construction site.*

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MM III-5. During construction phases, the contractor will be responsible for street cleaning in the construction areas at least once per week as needed.

Implementation of these mitigation measures would also reduce potential air quality impacts associated with construction activities.

- g. The proposed project would not result in or expose people to subsidence of the land. Subsidence has not been identified as a problem within the City of Beverly Hills (General Plan, Seismic Safety Element 1975). However, extraction of groundwater is a common cause that has been associated with subsidence problems. The proposed project would pump approximately 3,000 acre-feet of groundwater on an annual basis. This has been identified as the safe yield determined for the groundwater basin to avoid potential impacts to the basin (City of Beverly Hills 1985, 1992). Pumping an amount equal to or less than the safe yield is not anticipated to result in subsidence impacts. No significant impacts are anticipated.
- h. The proposed project is not anticipated to result in impacts involving expansive soils. The potential for expansive soils has not been identified and thus no significant impacts are anticipated.
- i. The proposed project is not anticipated to result in impacts associated with unique geologic or physical features. No unique geologic or physical features are known to be present in the vicinity of the proposed project.

IV. WATER

- a. The proposed project may result in minimal changes in absorption rates, drainage patterns or the rate and amount of surface runoff. Implementation of the proposed project will result in a minimal increase in the amount of paved surfaces to the area. The public works facility site is currently paved and serving as a parking lot for City vehicles. Therefore, no net increase in paved surfaces is expected to occur at this site. The well head facilities would be subterranean covering approximately 200 square feet and would result in negligible impediment to absorption. This increase will not significantly contribute to the rate or amount of surface runoff, and therefore would result in a less than significant impact.
- b. The proposed project may expose people or property to water related hazards such as flooding. The proposed project is located within Flood Zone C (relatively low risk) as designated by the Federal Emergency Management Agency (FEMA) and is not expected to be subject to flooding in the area (Sakurai pers comm). However, the City recognizes that certain parts of the community may potentially be vulnerable to

100-year floods (Sakurai pers comm). With respect to the proposed project, the well head facilities for the wells located in the Civic Center Drive ROW and the Beverly Gardens Park site, as well as the alternate well site in Beverly Gardens Park, may be subject to 100-year flood hazards. This would not be considered to result in a significant impact as the well head facilities would not be inhabited, with the exception of occasional maintenance activities. This inhabitation would be short term and would not likely occur during storm events. Therefore, this would result in a less than significant impact.

- c. The proposed project may result in discharge into surface waters or other alteration of surface water quality. The proposed well drilling and testing phase of the project would involve discharge of water into area storm drains for a few days per well, which ultimately discharge into the Pacific Ocean. This discharged water contains minerals and levels of Hydrogen sulfide (H_2S). The water will be treated with chlorine prior to discharge to oxidize the H_2S . Based on the Pilot Testing Report (1996), other minerals appear to be within levels of allowable discharge by the Los Angeles Regional Water Quality Control Board (LARWQCB). A National Pollutant Discharge Elimination System (NPDES) permit would be obtained prior to discharge. Monitoring would also be conducted to assure that the level of treatment is in compliance with the NPDES permit.

The operation of the treatment plant would involve the use of reverse osmosis (RO) units which will discharge a brine to a local storm drain. Although a stripping unit will result in the removal of H_2S , the brine will still be high in salts and other minerals, but much lower than the concentration of sea water. An NPDES permit will be required for this discharge of this brine to the storm drain. This discharge will also be monitored to assure compliance with the NPDES permit. These incorporated mitigation measures are presented below.

Mitigation Measures

- MM IV-1. Prior to issuance of the building permit for the public works facility, the City shall obtain an NPDES permit;*
- MM IV-2. Prior to construction of the well head facilities and groundwater testing, the contractor shall obtain an NPDES permit for temporary discharge of test water into the storm drainage system.*
- MM IV-3. During the operations of the project, the City shall conduct ongoing monitoring efforts to assure that the level of treatment is in compliance with the NPDES permit.*

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- d. The proposed project would not result in substantial changes in the amount of surface water in any water body. The project would result in discharges of groundwater during testing phase and brine during the plant operations phase to the storm drainage system. This storm drainage eventually discharges into flood control channels and ultimately the Pacific Ocean. However, the amount of surface flow from the project would be negligible and would not be expected to result in a significant impact.
- e. The proposed project would not result in changes in currents or the course or direction of water movements. While the project may contribute to storm drainage water flows, this would not affect water movements or currents. No direct alterations to the water courses would be implemented. No significant impacts are anticipated.
- f. The proposed project would result in change in the quantity of ground water either through direct additions or withdrawals, or through interception of an aquifer.

The principal groundwater units in the Beverly Hills area are the Hollywood Basin and the Central Basin. Historically, the City of Beverly Hills extracted groundwater from both the Hollywood and Central Ground Water Basins. This water was treated at two treatment plants and delivered to the City's customers. During these previous exercises in groundwater withdrawals, the City extracted an average of 3,015 acre feet per year from the Hollywood Basin from 13 wells between 1950-1975. Water quality and cost issues associated with rebuilding the treatment facilities caused the City to abandon this source in 1976 and used exclusively imported water (Water System Master Plan 1985). Ground water is proposed to be obtained from the Hollywood Basin because it is of better quality than the Central Basin. The California Department of Water Resources (DWR) has identified six major aquifers in the Hollywood Basin. From top to bottom, these include the Exposition, Gage, Jefferson, Lynwood, Silverado and Sunnyside. Depth to groundwater in this area is approximately 215 below ground surface (City of Beverly Hills Municipal Water Supply and Groundwater Study 1992).

DWR has defined the safe yield of a groundwater basin as the maximum quantity of water that can be continuously withdrawn without adverse effect. The safe yield therefore approximates the recharge to the basin. Several studies have been conducted on the groundwater resources of the area and estimates of the safe yield have been provided by a number of sources. For example, Bookman-Edmonston estimated the safe yield to be 3,000 acre-feet per year, James M. Montgomery Engineers also estimate safe yield at 3,000 acre-feet per year, Geotechnical Consultants estimated safe yield at 3,500 acre-feet per year and DWR estimated the safe-yield at 4,400 acre-feet per year (Municipal Water Supply and Groundwater Study 1992).

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The proposed project involves the extraction and treatment of up to 3,000 acre-feet per year in Phase II assuming that well tests and water quality analysis indicates that the project is feasible. This groundwater use is within the most conservative estimates of the safe yield of the basin. Since the City would be the only user of this basin, the impact to groundwater resources is considered less than significant.

- g. The proposed project would not result in the substantial altered direction or rate of flow of groundwater. Since the proposed project will only extract groundwater at or below the estimated safe yield, no substantial well draw-down on a basin wide basis is expected. Also it can be assumed that substantial changes in groundwater rate of flow or direction would not occur. Therefore any impact to groundwater resources are expected to be less than significant.
- h. The proposed project may result in impacts to groundwater quality. Currently, there are existing groundwater quality problems within the Hollywood Basin. These include total dissolved solids (TDS) levels of 463 to 622 mg/L, iron, manganese, and odor. Normal TDS drinking water standards would be 500 mg/L. Iron and manganese levels are two to three times higher than recommended levels, and hydrogen sulfide provides a significant source of odor (Municipal Water Supply and Groundwater Study 1992).

The proposed project would ensure that the groundwater resources are adequately treated prior to being mixed with the Metropolitan water supply. Water pumped from the proposed project will be fully treated using RO and H₂S stripping in order to meet all drinking water standards. The well drilling and pumping of the groundwater is not anticipated to cause any substantial degradation of the existing water quality of the aquifer. Short-term construction impacts to the local aquifers may occur during the drilling phases. However, initial pumped groundwater would not be immediately transferred for treatment. Substantial well pumping and testing would first be implemented. This phase is expected to remove all debris resulting from construction and well drilling activities prior to transmission to the treatment facility. The treatment of the groundwater will provide potable water from an aquifer which does not currently meet drinking water standards.

- i. The proposed project would not result in substantial reduction in the amount of groundwater otherwise available for public water supplies. The proposed project will remove approximately 3,000 acre-feet per year for public water supplies. This amount has determined to be the safe yield for extraction from the Hollywood Groundwater Basin. Although the groundwater would not be available for other uses, its use for the proposed project is for public supplies and is consistent with water resource planning for southern California. Furthermore, the City is the only agency that currently has plans to withdraw groundwater from the basin. This impact is considered to be less than significant.

V. AIR QUALITY

A detailed Air Quality report is presented in Appendix A. A summary of the detailed Air Quality report is presented below identifying the air quality impacts that may be associated with the proposed project.

- a,b. The proposed project may violate air quality standards or contribute to an existing or projected air quality violation. Air quality in the South Coast Air Basin (SCAB), which is inclusive of the City of Beverly Hills and most of Los Angeles County, is regulated by the South Coast Air Quality Management District (SCAQMD). The SCAB region has been in non-attainment for several air pollutants, including carbon monoxide and ozone, for some time, and is working toward improving air quality within the region.

Existing levels of ambient air quality and historical trends and projects in the project area are best documented by measurements made by the SCAQMD at its West Los Angeles air monitoring station. Monitored air pollutants include ozone (O_3), carbon monoxide (CO), and nitrogen oxides (NO_x) (as NO_2). Sulfur oxides (SO_x) (as SO_2) and particulate matter (PM_{10}) are monitored from the North Main Street station in Los Angeles, which is the closest station that regularly monitors this parameter. It is expected that the project area would have lower readings than the North Main Street station readings due to its more coastal location.

Recent monitoring data from these two stations (shown in Appendix A, Table A-2) show recurring violations of both the federal and State hourly standard for ozone and State standard for PM_{10} . No first-stage smog alerts have been reported in the past 5 years at either monitoring station. While the summer ozone levels are occasionally unhealthful for all receptor populations, they are lower than inland communities. Levels of primary automobile pollutants, such as CO, have not exceeded their standards in the last 5 years. In general, data shows that improvement has occurred throughout the 1990s in the western coastal portions of the Los Angeles Basin. However, desirable levels have not yet been attained for some pollutants.

Air quality analyses were performed separately for potential construction and operational impacts. Detailed calculations and discussions of assumptions can be found in Appendix A. Threshold standards established by the SCAQMD differ between construction and operational phases. Construction of the proposed project would be performed in two phases and the emissions from the construction of the wells would not be expected to be additive of those associated with the construction of the piping and public works facility. Additionally, if the anticipated volume and quality of water is unobtainable, the construction of the pipelines would not likely occur.

Well Construction

Construction activities and deliveries produce combustion pollutants from vehicles and construction equipment both at the site and along haul routes. Dust would also be produced locally at the construction site due to excavation activities. The area to be disturbed is estimated at approximately 0.1 acre per well site.

Well construction emissions are shown in Table A-3 of Appendix A. The projected emissions are well below the significance criteria standards, and are sufficiently low such that two wells could be constructed simultaneously without exceeding either the daily or quarterly significance criteria. Additionally, because the number of pieces of equipment involved in the construction effort is relatively small as are the number of related vehicles, and the area is open allowing for pollutant dispersion, no criteria pollutant concentrations in excess of State or federal standards will be produced and no significant "hot spots" will be created. All emissions associated with the project are typical of internal combustion engines. No hazardous pollutants are created in significant quantities and no significant impacts will result.

Mitigation Measure

MM V-1. During Phase I construction, construction activities shall be limited to the development of not more than two wells simultaneously. If the City wishes to construct all four wells simultaneously, then the heavy construction equipment is recommended to be calibrated with 2-4 degrees of fuel injection retard and equipped with high pressure fuel injectors¹. The City could also opt to restrict construction of the wells to no more than 24 total hours (or 6 hours for each well) on a daily basis².

Pipeline Construction

At this time, the exact type of equipment to be used for construction of the pipelines is unknown and will vary from contractor to contractor. However, it can be assumed that a generic type of equipment to perform activities will be utilized.

¹ Fuel injection retardation can be performed on heavy construction equipment diesel engines and would require recalibration of the engines' fuel injection system. Provision of high pressure fuel injectors for the construction equipment would require that the existing injectors be removed by disconnecting the fuel rail of individual fuel lines (depending on the engine design), removing the existing injectors, and replacing these with the high pressure units. To supply the high pressure necessary to make the replaced injectors work properly could require the recalibration of the fuel pressure regulator, and perhaps replacement of the fuel pump and resizing of the fuel delivery and return lines. All work should be performed by a competent, certified diesel mechanic.

² Based on an emissions threshold of 100 lbs./day or 2.5 tons/quarter for NOx. Well construction equipment would emit approximately 4.1 lbs./hour of NOx for each well.

The estimated projected emissions for construction of the pipelines is shown in Table A-4 of Appendix A. As the pipelines are to be placed in existing streets and alleys, and no grading is to be performed, fugitive dust emissions would be very limited. Construction emissions are within both the daily and quarterly criteria levels and pipeline construction is not expected to result in any significant air quality impacts. Similarly, based on the relatively small construction work force and number of materials' hauls, no criteria pollutant concentrations in excess of state or federal standards will be produced and not significant "hot spots" will be created.

Public Works Facility/Treatment Plant Construction

Like the wells and pipelines, construction of the public works facility will require the use of heavy equipment, manpower, and materials hauls, and equipment use would be staged. Equipment used is expected to be more varied than with the well sites or the pipeline installation. The potential for an air quality impact is greatest during the initial phases of construction because the heaviest, and most polluting equipment, is associated with site preparation where dozers, excavators, loaders, compressors, and pavers are used. The assumptions used for calculations of emissions are presented in Appendix A, and estimated emissions are shown in Table A-5.

As the site is already paved, it is level and relatively little grading would be required. To present a reasonable worst case scenario, it is assumed that the entire site undergoes simultaneous grading. Twice daily site watering is estimated to reduce dust (and its associated PM₁₀) emissions by 50 percent. Site watering may be required by SCAQMD Rule 403 for the grading phase of the public works facility. However, even if site watering were not performed, PM₁₀ emissions would not exceed with their daily or quarterly significance criteria.

Construction emissions are within both the daily and quarterly criteria levels and public works facility construction is not expected to result in any significant air quality impacts. However, if the public works facility construction is performed simultaneously with pipeline construction, NO₂ emissions could exceed both daily (100 lbs/day) and quarterly (2.5 tons/quarter) criteria levels resulting in a significant air quality impact.

No criteria pollutant concentrations in excess of State or federal standards would be produced from construction of the public works facility and no significant "hot spots" would be created. Additionally, no hazardous pollutants would be created in significant quantities. No significant impacts would occur.

Mitigation Measure

MM V-2. During Phase II of construction, construction site preparation activities shall be limited to the construction of either the public

works facility or the pipelines at any given time. If the City wishes to conduct site preparation activities for both the pipelines and the public works facility simultaneously, then all heavy construction equipment to be used simultaneously should be calibrated with 2-4 degrees of fuel injection retard and equipped with high pressure fuel injectors³. The City could also opt to limit heavy construction equipment use to no more than 88 total hours on a daily basis⁴.

Operational Impacts

Stationary Source Emissions

While construction of the wells, pipelines, and public works facility may occur separately, all will work in unison and their emissions will be additive. With the exception of occasional testing of the emergency generator, minimal on-site exhaust emissions would be produced from project operations for air stripping systems that would remove any H₂S gas that may be present in the extracted groundwater. It cannot be determined at this point how much H₂S gas will be present in the water. However, it is expected that emissions from this activity will be negligible.

If possible, well water will be obtained in a region of the aquifer that is not contaminated. Well testing will confirm the absence (or presence) of any chemicals which may produce airborne toxins. If the testing of well water shows the need for further treatment beyond that proposed, the water could be subject to the use granular activated carbon adsorption and/or air stripping. Air emissions produced from an air stripper may require subsequent treatment to remove any hazardous compounds. These operations are regulated and permitted through the SCAQMD and SCAQMD will require at least a screening level health risk assessment prior to issuing a Permit to Operate. These measures will reduce any potential health risk impacts to a level that is less than significant.

Past discussions with SCAQMD staff revealed that wastewater treatment facilities produce on the order of 0.1 ton per million gallons per day treated per year. Based on the treatment of 3.5 million gallons of wastewater per day, volatile organic compound (VOC) emissions would be estimated at less than 1.9 lbs/day. The pumping and disinfection of groundwater would be expected to create even fewer quantities of VOC emissions and will not result in a significant impact.

³ Same as Footnote 1.

⁴ If the City will restrict heavy equipment use to no more than 88 total hours on a daily basis, all criteria pollutants should remain within their respective thresholds allowing simultaneous construction site preparation activities for the public works facility and the pipelines. Based on a threshold of 100 lbs./day and 2.5 tons/quarter for NOx. This could best be monitored by requiring the contractor to log daily equipment hours and restrict these hours to 88. This would enable the contractors to be on-site for other construction activities even if they are not using heavy equipment.

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Most exhaust emissions are produced off-site during the production of project-related electricity necessary to run both the well pumps and the public works facility/treatment plant. No motors or emissions are associated with pipeline operations. Assuming a continuous 24-hour operation, the total daily electrical consumption for the project is estimated at approximately 10,458 kilowatt-hours. Calculations and assumptions are provided in Table A-6 of Appendix A. The emissions associated with electrical consumption are minimal and alone do not exceed the thresholds for daily or quarterly emission standards.

In addition to electricity, the use of natural gas for space and water heating would be required, which could generate air pollutants. If natural gas would be used, it would likely be used in the lobby/employee facilities, which consists of an area approximately 7,000 square feet. This would require approximately 14,000 cubic feet of gas per month (455 cubic feet per day). All values are less than 0.1 pound per day and are considered negligible.

Mobile Source Emissions

The wells and pipelines would not require regular monitoring and no regular vehicle trips are associated with their use. The treatment plant would be automated and its staff would not be expected to exceed more than 10 employees per day. Trucks required to make regular deliveries and removal of sludge are anticipated at one or two per week. The estimated emissions (shown in Table A-6 of Appendix A), however assume a worst case scenario of one truck per day. Criteria pollutants associated with project operations are well below the significance criteria values and no significant impacts are projected.

- c. The proposed project would not significantly alter air movement, moisture, or temperature, or cause any change in climate. The proposed project includes the development of a two-story (45 feet high), approximately 37,600 square-foot building on a parcel of land that is currently vacant and improved as a parking lot. While not considered to be a substantial structure, the proposed building would alter air movements within the site and potentially to neighboring properties. The property that would likely be most affected would be the adjacent veterinary hospital. Currently, a block wall exists along the north side of the project site separating the site from the veterinary hospital. This currently serves as an obstacle for air flow into the neighboring site. However, construction of the proposed project would further restrict air flow from entering the neighboring veterinary hospital property from the south. This would be considered to be a less-than-significant impact.
- d. The proposed project may result in the creation of objectionable odors. Odors are one of the most obvious forms of air pollution noticed by the general public. Odors can present significant problems for both the source and the surrounding community. Although offensive odors seldom cause physical harm, they can cause agitation,

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anger, and concern to the general public. The general public is usually concerned with offensive odors because they associate them with the possibility of also causing adverse health effects. However, because something smells bad does not mean that it is toxic. For instance, H₂S gas smells like a rotten egg, but its odor would not be toxic at the low concentrations that would be found within the ambient air.

H₂S gas has been found in previous testing of the groundwater basin and is likely to be present during the well testing phase of the proposed project. This water is proposed to be discharged to the storm drain system. Since there is a potential for odor during this testing phase, the pumped water will be treated with sodium hypochlorite to oxidize the H₂S prior to discharge. This system will be monitored 24 hours per day during well testing to assure no objectionable odors are created. Implementation of these treatment methods and monitoring activities would result in less-than-significant impacts.

The treatment plant will also be required to remove H₂S from the water. While odor threshold varies with an individual's sensitivity, these odors are typically notable in the range of 0.003 to 0.02 parts per million (ppm). The number of "odor units" or "dilution-to-threshold" (D/T) is a measure of odor's intensity, but does not incorporate any possible sense of unpleasantness. The SCAQMD CEQA Handbook notes that a 5 D/T, an unpleasant odor is clearly noticeable to most people of normal sensitivity. At 10 D/T, an unpleasant odor may evoke a rise in public complaint and this level is recommended as an odor significance threshold. For H₂S as the primary source of odors, 1 D/T is approximately 0.003 ppm. Based on a 10 D/T ratio, an impact would be significant at 0.03 ppm, which is equal to the State's odor based public health threshold for a one-hour average of 0.03 ppm.

At this time it cannot be determined as to whether the received water will contain H₂S in sufficient quantities to create odors that are of a significant level or even detectable at off-site receptor locations. Further testing of the wells once installed will allow a more thorough evaluation of the potential for odor impacts. However, several measures would be incorporated to ensure that any potential impacts remain at less-than-significant levels. Air stripping systems are incorporated into the design of the proposed treatment plant, which will remove any H₂S gas that may be present in the extracted groundwater.

VI. TRANSPORTATION/CIRCULATION

- a. The proposed project would not result in a substantial increase in vehicle trips or traffic congestion. Traffic impact analysis is presented below for construction of the wells, pipelines and treatment plant, and operation of the project facilities respectively.

Well Sites

Phase I of construction will involve the drilling and testing of three new water wells. These proposed well locations are shown in Figure 2 and the current roadway traffic in the area is presented in Table 1 below.

Each of these drilling sites could involve a crew of up to 10 workers in any given day. It is estimated that each site will generate up to 20 vehicular trips per day including drilling personnel, other service workers, truck hauls, and supply vehicles during normal well drilling; and up to 30 vehicle trips per day during well testing. This temporary level of increased traffic will not significantly lead to increased traffic congestion in the area.

Table 1. Existing Traffic Volumes on Major Roadways in the Project Vicinity

Location	Traffic (vehicles/day)
Burton Way (between Maple and Foothill) ⁽¹⁾	24,500 - 12,250 each direction
Santa Monica Boulevard, SR-2 (near Doheny Drive) ⁽²⁾	40,500 - 20,250 each direction
Foothill Road (south of Civic Center Dr.) ⁽¹⁾	2,100 - both directions
Foothill Road (north of 3rd Street) ⁽¹⁾	3,500 - both directions
Beverly Boulevard (east of Civic Center Dr.) ⁽¹⁾	Eastbound - 12,900; Westbound - 13,700
Source: (1) Bijan Vaziri, City of Beverly Hills, June 2, 1997. Based on 1992 annual traffic count data. (2) Caltrans 1995	

Drilling and testing of the well will have a potential to create substantial temporary traffic congestion associated with lane closure and other construction activities. It is planned that access to the drill sites will be constructed so that there will be a low potential for lane closures. If lane closures are necessary, they will be conducted during non-peak traffic periods to reduce potential for increased congestion. Therefore, the impacts are considered less than significant.

Upon completion of the wells, the wells will be unmanned with only periodic servicing required. There would be no operation related traffic impacts.

Pipeline Construction

Construction of the proposed raw water pipeline will generally follow Civic Center Drive, Burton Way and Foothill Road. If the alternate well site in Beverly Gardens

Park is chosen, then the well pipelines would extend through the Park rather than along Civic Center Drive. The product water pipeline would extend along Foothill Road crossing Santa Monica Boulevard, north along Maple Drive for most of the pipeline length. The proposed pipeline would then extend westbound for a short route along Lomitas Avenue, then north through the alley between Alpine Drive and Rexford Drive, up to Sunset Boulevard where the City's supply connects to Metropolitan's supply. The alternate pipeline route would follow generally the same route until the intersection of Maple Drive and Lomitas Avenue. It would then continue northbound along Maple Drive up to Sunset Boulevard then west to the water supply connection, rather than turning west at Lomitas Avenue and then north in the alley.

It is estimated that a crew of 20 would be required for pipeline construction. Based on service vehicle use and supply trucks, it is estimated that pipeline construction traffic will involve approximately 40 vehicle trips per day. This increased in vehicular traffic is not considered significant when compared to existing traffic counts for the area roadways (See Table 1). No vehicular traffic generation would be associated with normal operation of the pipeline.

Pipeline construction would have the potential to create substantial traffic congestion associated with lane closures and other construction activities. If lane closures are necessary, these will be conducted during non-peak traffic periods to reduce congestion. A small portion of the proposed pipeline route would be through the alley between Rexford Drive and Alpine Drive north of Lomitas Avenue. These pipelines are also proposed within roadway medians and other low volume residential streets. Traffic congestion will not be expected to reach significant levels in these areas. There is a potential for substantial traffic congestion to occur where the pipeline crosses major roadways including Burton Way, Civic Center Drive and Santa Monica Boulevard. Potential congestion impacts from lane closures along Maple Drive and Lomitas Avenue (and Sunset Boulevard if the alternate pipeline route is chosen) may also occur during construction. It is expected that it will take two days for the pipeline to cross the major roadways and may take three to five days for construction along Maple Drive. Although access along Maple Drive may be temporarily restricted during construction activities, this would not substantially deter traffic movements as several parallel streets can easily serve as alternate routes. Temporary access constraints, however, may be felt by the residents along Maple Drive. Measures will be incorporated into project design to reduce this potential congestion related impacts to less-than-significant levels.

Mitigation Measures

MM VI-1. Prior to construction activities, the contractor shall post the occurrence of roadway construction activities well in advance of

construction so that motorists can take alternative routes;

- MM VI-2. During construction phases, the contractor shall curtail lane closures to the fullest extent possible during peak hours (7:00 a.m. to 9:00 a.m., and 4:00 p.m. to 6:00 p.m.);*
- MM VI-3. Prior to construction activities, the contractor in conjunction with the City Public Works Department shall develop detour routes where possible;*
- MM VI-4. During construction activities, the contractor shall use flag persons where appropriate; and*
- MM VI-5. During construction phases, the contractor shall ensure that the pipeline trenches are covered, and access maintained during non-working hours.*

Public Works Facility

Construction of the public works facility will involve a construction crew of approximately 40 on any given day. The construction workers plus 8 truck hauls and other construction related traffic is anticipated to generate up to 96 vehicle trips per day. This impact is not considered significant due to the low number and temporary nature of the construction phase.

Operating personnel at the treatment plant will be minimal (one to two person crew). The traffic that would be generated associated with the other public works offices and facilities would result in no net increase. The personnel occupying the building would consist of existing City staff that would be relocated to the proposed site facilities. Traffic and circulation patterns within the area would change to a minimal degree, as some of the City staff's vehicles would likely occupy the new proposed site. The existing parking structure at City Hall would continue to be utilized by most employees of the proposed facility. The proposed site would not, therefore, contribute to a substantial net increase in the local area. Therefore, traffic generation associated with operation of the facility would not result in a significant impact.

- b. The proposed project would not result in hazard to safety from design features. The project would not incorporate hazardous design features that would result in traffic problems. During the construction phase of the project, however, temporary street closures and construction equipment may have the potential to result in minimal hazards to automobile drivers, pedestrians, and bicyclists. Implementation of mitigation measures *MM VI-1* through *MM VI-5* as discussed above would assure that potential impacts would be less-than-significant.

- c. The proposed project may result in temporary emergency access problems during construction. Pipeline construction has the potential to block emergency access during some stages of construction. During construction of the pipelines, temporary obstacles from construction equipment, street closures, pipeline trenches or construction crews may inhibit access to certain areas. This is a potentially significant impact that could be mitigated to non-significant levels through the following:

Mitigation Measures

MM VI-6. During construction phases, the contractor in conjunction with City staff shall inform emergency agencies, such as fire and police, as well as affected business and residents, as to any road closure.

MM VI-7. During construction activities, the contractor shall maintain alternative access for emergency vehicles.

MM VI-8. Same as MM VI-5. During construction phases, the contractor shall ensure that the pipeline trenches are covered, and access maintained during non-working hours.

- d. The proposed project may result in insufficient parking capacity on site. Off street parking would be provided at each well site for construction vehicles during the drilling process. Onsite parking would also be provided at the public works facility site during construction of the facility. During operations of the public works facility and treatment plant, parking would be provided in an onsite parking lot. The City has determined that the parking demand for the project would require space for service vehicles as well as employee and public parking.

The available parking area on site following construction of the public works facility would comprise approximately 55,600 square feet to accommodate parking and adequate circulation on-site. The total area required for City service vehicles has been determined to be approximately 46,350 square feet. This would result in a surplus of approximately 9,250 square feet for automobile parking for employees and visitors. It is anticipated that most employees and some visitors would utilize the existing parking structure at City Hall which will help to compensate for this shortfall. Additionally, implementation of the following mitigation measure would reduce potential impacts to less-than-significant levels:

Mitigation Measure

MM VI-9. The City Public Works management shall coordinate a parking program to encourage employees at the proposed facility to park in

the existing City parking structure to compensate for the parking deficiency.

Pipeline construction may result in temporary restriction of parking during the construction phase. Pipeline construction workers may also require additional parking during the construction phase. Several of the following measures could be employed into project design to reduce any impact associated with parking:

Mitigation Measures

MM VI-10. During the construction phases, the contractor in conjunction with the City shall designate parking areas for construction workers to reduce any potential impact on parking capacity;

MM VI-11. During construction activities, the contractor shall implement parking control within pipeline construction areas (i.e., posting signs in advance, notifying residents individually, identifying alternative parking areas, etc.); and

MM VI-12. During construction phases, the contractor in conjunction with the City shall designate alternative parking areas, if necessary.

- e. The proposed project may result in hazards or barriers to pedestrians and/or bicycles. The well drilling and pipeline construction phase could potentially create impacts associated with hazards or barriers to pedestrians and bicycles. Street closures, trenches, construction equipment and activities all have the potential to affect pedestrian and bicycle circulation in construction areas. Several measures to reduce these potential impacts to less-than-significant levels could be incorporated into the project and include the following:

Mitigation Measures

MM VI-13. During the construction phases, the contractor shall place barriers and other protective equipment to preclude bicyclists and pedestrians from entering the construction areas;

MM VI-14. During the construction phases, the contractor in conjunction with the City shall identify and post alternative bicycle and pedestrian routes (i.e., detour signs, "sidewalk closed" signs, etc.); and

MM VI-15. During the construction phases, the contractor shall notify the schools in the area of potential hazards along school routes to ensure the safety of students.

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- f. The proposed project would not conflict with adopted policies supporting alternative transportation. Alternative modes of transportation routes may be affected during the construction phases of the project. However, no long-term effects would occur and no policies would be undermined as a result of the project. No significant impacts are anticipated.
- g. The proposed project would not impacts to rail, waterborne or air traffic. A railroad right-of-way exists in the median between Santa Monica Boulevard and Civic Center Drive in the vicinity of two of the proposed well sites and the alternate well site. However, the rail line has been abandoned and is not anticipated to be redeveloped in the foreseeable future. Waterborne or air traffic do not exist in the project area and would not be affected. No impacts would occur.

VII. BIOLOGICAL RESOURCES

- a,b,c. The proposed project would not result in impacts to endangered, threatened, or rare species or their habitats; locally designated species; or locally designated natural communities. The proposed project is located within a highly urban area of the City and the Los Angeles area. No special-status species or habitats are present in the vicinity of the proposed project. Furthermore, no direct alterations to any wildlife habitat would occur as a result of the project. Therefore, no impacts are anticipated.
- d,e. The proposed project would not result in impacts to wetland habitat or wildlife migration corridors. The proposed project is located within a highly urban area of the City and the Los Angeles area. No wetland habitats or migratory corridors are present in the vicinity of the proposed project. Therefore, no impacts are anticipated.

VIII. ENERGY AND MINERAL RESOURCES

- a,b. The proposed project would not conflict with adopted energy conservation plans or use non-renewable resources in a wasteful and inefficient manner. The two feed pumps for the water treatment facility will be run by a 75 horsepower (hp) motor, and each well will be equipped with a 50 hp electric motor to pump the water from the ground to the treatment plant. The proposed project is anticipated to require 500 Kilowatts (Kw) of electricity (Everest pers comm), and consume approximately 10,458 Kwhrs of electricity per day (Synectecology 1998 [Appendix A]). However, exact requirements and connections cannot be determined until the final design phase has been completed and submitted to Southern California Edison for review. Additionally, the design of the public works facility will incorporate energy-efficient lighting, thermal insulation, and other energy conservation measures to reduce energy consumption. It is expected that energy requirements for the proposed project could

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be supplied to the well sites and the treatment plant without resulting in significant impacts. Therefore, no significant impacts are anticipated.

- c. The proposed project would not result in the loss of availability of a known mineral resource that would be of future value to the region and residents of the State. No known mineral resources are expected to exist within the project vicinity. Therefore, no impacts are anticipated.

IX. HAZARDS

- a. The proposed project may have the potential to involve a risk of release of hazardous substances. The proposed well drilling and testing program would involve the use of fuels, lubricating fluids and similar materials associated with construction. There is a potential that this material could be accidentally released during this phase of the project resulting in impacts. The well testing program will also involve treating the pumped water with sodium hypochlorite (liquid bleach) prior to discharge to the storm drain. This chemical is considered hazardous and its release without clean-up would be considered a significant impact. Mitigation measures have been incorporated into the project design to reduce potential impacts to less-than-significant levels and include the following:

Mitigation Measures

MM IX-1. Prior to construction and issuance of building permits, the design-build contractor shall develop and have approved a pollution prevention and control plan. This plan shall outline methods for storage and use of hazardous materials to reduce the potential as well as the consequences of any accidental spill. The plan shall also provide procedures for cleanup of any potential release. This plan shall include placement of clean up materials and procedures for minor spills, as well as outlining a series of procedures for notification of neighbors and agencies and clean-up of any spills.

Construction of the proposed water pipeline and treatment plant may also involve the potential for accidental spills of fuels, lubricating oils and hydraulic fluids during the construction process. While this may constitute a significant impact, the development and implementation of the pollution prevention and control plan in *MM IX-1* will reduce potential impacts to less-than-significant levels.

During operations of the facility, the proposed water treatment facility will also use a variety of chemicals for the treatment of the groundwater to drinking water standards. Materials that will be used and stored on site will include concentrated

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sulfuric acid, aqueous ammonia or caustic soda, hypochlorite, scale inhibitors and other proprietary chemicals. Hypochlorite, ammonia, caustic soda and sulfuric acid will be stored in bulk storage tanks at the facility. Scale inhibitors and other chemicals will be stored in 55 gallon drums in a chemical storage room. All areas storing chemicals will be constructed with containment structures to contain a full tank of any material should the tanks rupture.

A spill of material may result in potentially significant impacts due to the hazardous and toxic nature of the chemicals involved. However, the project design will assure that any spills will be contained on site. Additionally, any potential for hazardous vapor clouds will be very remote since containment structures will be separate for each type of chemical. Furthermore, a pollution prevention and control plan will be developed to govern clean up of small and major spills as well as procedures for agency and neighbor notifications. These procedures as well as the relative remoteness of the site from residential areas or other sensitive receptors will reduce potential impacts to less-than-significant levels.

- c. The proposed project may result in the creation of health hazards or potential health hazards. As discussed above, the project would involve the use and storage of hazardous and toxic materials that could create a potential health hazard. The method of storage, the relative remote location of the proposed treatment plant site from residential units and the use of pollution prevention and control procedures will reduce these potential impacts to less-than-significant levels.
- d. The proposed project is not expected to expose people to existing sources of potential health hazards. Several underground storage tanks and hazardous waste sites exist in proximity to the proposed public works facility site and should be considered as potential sources of nearby health hazards.

The Industrial Area contains several problematic underground storage tank sites. The closest sources occurring in the City Yard at 331 N. Foothill Road (two 285-gallon tanks containing motor oil, one 285-gallon tank containing hydraulic oil, one 285-gallon tank containing automatic transmission fluid, one 500-gallon waste oil tank, one 5,000-gallon gasoline tank, and one 10,000-gallon gasoline tank), which is directly south of the site (Industrial Area Plan Draft EIR 1990). Historically, soil and groundwater contamination has occurred at this site. Remediation activities are currently under way and have been ongoing for approximately 6 months. It is expected that the clean up process will take approximately 1 year to complete. All contamination would be cleaned up according to acceptable standards. There is also one 285-gallon tank containing waste oil at 342 N. Foothill Road, which is across the street from the proposed site (Industrial Area Plan Draft EIR 1990). No anticipated problems are associated with this site.

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Several hazardous waste sites also exist in the vicinity of the project. The most notable site containing hazardous waste that is listed by the Department of Health Services, Water Resources Control Board, and the California Waste Management Board include the Beverly Hills Fire Department, located at 445 North Rexford Drive, which is a few blocks east of the site (Industrial Area Plan Draft EIR 1990). Due to the locations of this site and the distance from the project areas, it is not anticipated that localized impacts would occur. However, there is a potential for contaminated groundwater beneath these sites to move beneath adjacent sites (Industrial Area Plan Draft EIR 1990). The proposed project does not include groundwater exploration at adjacent sites to the contaminated areas and thus no significant impact are anticipated.

In June of 1989, a review by Lindmark Engineering noted that the Southern California Gas Company, located at 400 N. Foothill Road (north and across the street from the site), was also of concern listed as a hazardous waste site (City of Beverly Hills Industrial Area Plan Draft EIR, 1990). However, all necessary site closure reports have been filed and no further impacts are anticipated (Sakurai, pers com).

Because grading activities for the proposed public works facility adjacent to the site at 331 N. Foothill Road would be minimal and current remediation efforts are taking place, the proposed project is not expected to expose persons to existing significant health hazards. This would be considered to be a less-than-significant impact.

- e. The proposed project would not result in increased fire hazard in areas with flammable brush, grass or trees. The proposed project area is located within an urbanized area without significant areas of flammable brush, grass or trees. No fire related impacts are anticipated.

X. NOISE

A detailed Noise Analysis report is presented in Appendix B. A summary of the analysis is presented below.

- a,b. The proposed project would result in a minimal increase in existing noise levels. Applicable noise criteria are presented in the City of Beverly Hills Noise Element (1975) and methods to enforce these criteria are presented in the City of Beverly Hills Noise Ordinance (1988). As stated in the Noise Element, "Actual standards have not been developed regarding noise in Beverly Hills. However, the City Ordinances on noise imply policies and standards: That the ambient noise levels within Beverly Hills should not be increased by additional specific noise sources. Policies within the Noise Ordinance which specifically relate to the project include Sec.5-1.202, "Machinery, equipment, fans, and air-conditioning," which restricts noise from

exceeding an increase of 5 dBA at any property line, and Sec 5-1.2, "restriction on construction activity," which restricts construction to between the hours of 8:00 a.m. and 6:00 p.m. and disallows construction of Sundays, legal holidays, and Saturdays within 500 feet of residential areas.

Existing noise levels near the existing and proposed wells, pipelines, and treatment facility are those typical of urban development. Noise sources derive almost exclusively from vehicular traffic. However, other sources of noise can also contribute to ambient noise in an area. For example, at the time of the first field study, Burton Way (along which the existing and one proposed well are located) was undergoing reconstruction and heavy equipment noise added to the ambient noise profile. Additionally, at the City equipment yard (the site of the proposed treatment facility) the dog barking from the adjoining small animal hospital was evident.

To determine ambient noise at the various well sites, at the public works facility site, and at proximate receptor locations, field studies were performed on May 22, 1997 and January 21, 1998. Six noise level measurements were obtained during the first study and an additional five were obtained during the second to characterize the existing noise in the vicinity of the project components. These noise measurements are shown in Table B-1 of Appendix B.

Because it would not be possible to obtain noise level measurements along the entirety of the pipeline route, these areas are inferred from the data included in the City's General Plan Noise Element. Noise along the routes to be situated within the right-of-way along both Burton and Santa Monica would be projected to be similar to the measurements obtained along these routes. Areas along Sunset Boulevard (the alternate product water pipeline route) would be similar to those along Santa Monica Boulevard. Areas with less traffic, such as along Maple are presented in the Noise Element as being between 60 and 69 dBA during the day decreasing to below 60 dBA during the night. Less traveled areas, such as Lomitas Avenue and within the alley between Rexford Drive and Alpine Drive are less influenced by traffic and these areas are estimated at less than 60 dBA throughout the day.

Based on the City of Beverly Hills' adopted noise criteria in the General Plan, impacts are considered to be significant if operational noise adds 5 dBA at the property line as per Sec. 5-1.202. Construction noise would be significant if construction were not performed in accordance with Sec. 5-1.2. Detailed calculations and estimated noise generation methodologies are discussed in Appendix B.

Construction Impacts

Construction noise represents a short-term impact on ambient noise levels, as noise levels produced by construction activities can reach relatively high levels. The

projected noise associated with construction at varying distances from the construction effort is presented in Table B-2 in Appendix B.

Well Installation

Well installation is most proximate to sensitive land uses along Burton Way, at Civic Center Drive and within Beverly Gardens Park where drilling equipment could be located at a distance of approximately 100 feet to nearby residents and the projected noise level from construction equipment could be on the order of 70 dBA. In all cases, this value would be additive with traffic noise and the resultant noise levels could be between 71 and 72 dBA. While noise from construction would be notable, it is well below any level deemed as hazardous to hearing acuity. Thus, while the impact may be adverse, construction would be performed within the guidelines set forth in Sec 5.1-2 of the local Noise Ordinance, thereby resulting in less-than-significant impacts.

Noise impacts may occur during nighttime hours as well on a few occasions during well testing, which would last for a 24 hour period. This would result in greater impacts than daytime construction impacts due to less traffic, and thus less ambient noise levels. However, implementation of noise curtains and shrouding of motorized equipment during construction and well testing activities (after the designated hours as specified by the City's noise ordinance), would substantially reduce these impacts to less-than-significant levels.

Pipeline Installation

Pipelines would be located more proximate to local residents than wells because they would be placed in existing easements (streets and alleys) and do not have the extra buffer zone provided by the parkways and extended distance associated with the well placement.

Pipelines placed along Burton Way could come to within about 50 feet of local residents and the noise projected at these residential locations would be on the order of 76 dBA L_{eq} . Local traffic could raise this value by about 1 dBA to about 77 dBA L_{eq} . While the noise from construction could be notable, it is well below any level deemed hazardous to hearing acuity. Construction activities would be performed within the guidelines set forth in Sec 5.1-202 of the local Noise Ordinance, which would reduce potential impacts to less-than-significant levels.

Pipeline routes along Santa Monica Boulevard, as well as the alternative route along Sunset Boulevard, are situated further from residential receptors and the resultant noise from this construction would be on the order of 70 dBA. Because traffic along this route is greater, the construction effort would add a lesser volume to the total noise profile, and again would produce an adverse, but not significant impact.

Construction of the pipelines to the north of Santa Monica Boulevard, along Maple Drive and Lomitas Avenue and specifically within the alleys would take equipment more proximate to receptor locations. While local streets are approximately 48 feet-wide, the alley between Alpine Drive and Rexford Drive is approximately 25 feet-wide. In some cases, zero lot lines are evident, but most residences are located closer to the streets opposite the alley. Accessory structures and tennis courts mostly line the alley. While most of these lots also have walls or fencing, some of the habitable structures have second-story rooms immediately overlooking the alley. In these cases, construction equipment could be located as little as 10 feet from the habitable structures and the projected noise level at the dwelling could be as much as 90 dBA. Structural attenuation provided by the dwelling, with windows closed, is in excess of 20 dBA and a resultant interior noise level of as much as 70 dBA could result. Again, while this level is certainly adverse, the exposure is below any safety-related concerns, is only of a temporary duration, and by City standards, not significant.

Public Works Facility Construction

The installation of the public works facility is projected to use a larger assemblage of equipment than either the wells or pipeline, and noise levels would be expected to be greater. Here, a value of 80 dBA as measured at a distance of 50 feet is deemed as a reasonable projection for construction noise. The 65 dBA noise level (typically accepted as a desirable exterior noise level), would occur at a distance of approximately 280 feet. The public works facility is not located near any sensitive land uses and when construction is conducted in accordance with City policy, it would not result in a significant impact.

Construction of pipelines and potentially well construction could create nuisance impacts to local residents and should be reduced to the extent feasible. While by City standards no significant adverse impacts would occur, there may be the potential for temporary adverse impacts to occur during construction activities. Thus, the incorporation of the following mitigation measures would further reduce noise impacts.

Mitigation Measures

- MM X-1. During construction phases, the contractor shall ensure that all construction be performed in accordance with Sec. 5-1.202 of the City of Beverly Hills Noise Ordinance.*
- MM X-2. During construction phases, the contractor should strive to use the quietest equipment available. All internal combustion powered equipment should be equipped with properly operating mufflers and kept in a proper state of tune to alleviate back-fires. For that equipment installing pipelines north of Santa Monica Boulevard,*

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engines are recommended to be fitted with protective shrouds to reduce motor noise.

- MM X-3. During construction activities, portable equipment should be located as far as practicable from the adjacent residents.*
- MM X-4. During construction phases, equipment should be stored and maintained as far as practicable from the adjacent residents.*
- MM X-5. During construction activities, noise curtains should be used for construction and testing of wells, and all pipeline construction north of Santa Monica Boulevard.*
- MM X-6. Prior to construction activities, the contractor, in conjunction with the City, should implement a public awareness program to alert the public of the upcoming construction disturbance.*
- MM X-7. The City should identify a disturbance coordinator that would be responsible for responding to noise complaints.*

Operational Impacts

Noise impacts for project operations are subject to Sec. 5-1.202 of the Noise Ordinance as noted above. To determine if an impact is probable it is necessary to ascertain the noise from similar equipment. Operational impacts were extrapolated from a noise survey that was conducted on June 3, 1997, at the City of Arcadia groundwater extraction well and pumping facility located at 141 East Camino Real within the City of Arcadia. The proposed project utilizes 50 horsepower well pumps and the entire assembly is located within an underground vault. Noise from the pump is expected to be on the order of 40 dBA at a distance of 10 feet. The proposed project's pumps would be entirely underground and their noise could be even less than this value.

Well Facilities

The noise from the proposed wells is projected at less than 40 dBA at a distance of 10 feet. Noise from the pumps would not be discernable beyond the parkways in which they are placed and would not add 5 dBA to the ambient noise at the property line. No noise impacts, either adverse or significant, are anticipated from their operation.

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Pipelines

No mechanical equipment is directly associated with pipeline operation. Furthermore, the pipelines are entirely underground and produce no noise. Therefore, no noise impacts, with adverse or significant, are anticipated from their operation.

Public Works Facility

In the treatment of water, chemical injection and reverse osmosis procedures do not contribute measurably to plant noise and the noise from the operation of the treatment plant primarily associated with the operation of its pumps. The facility is to be enclosed and the resultant exterior noise is not expected to exceed that measured at the City of Arcadia pumping station (51.5 dBA at a distance of 75 feet). This level is less than that measured in the field survey at the plant site (54.2 dBA) and the resultant noise is calculated at 56.1 dBA. Furthermore, extensive acoustical treatment, including vibration isolation will be implemented for the facility. Therefore, the treatment plant will not add 5 dBA to the ambient noise and does not present a significant impact.

The treatment plant will however operate 24 hours per day. During the night ambient noise could decrease by as much as 10 dBA over those levels measured in the field and a resultant noise level of about 45 dBA could be expected. At a distance of about 150 feet to the street, the noise from the plant would attenuate by 6 dBA and the resultant level would be approximately 45.5 dBA. When added to the projected ambient noise level of 45 dBA, the resultant noise level is calculated at about 48.3 dBA for an increase of about 3.3 dBA. This value is less than the 5 dBA criterion and does not present a significant impact. Any impact would then occur at the small animal hospital located immediately to the north. This facility is not operated during the night and with no receptors, the impact would not be considered significant.

Based on the above criteria, no significant operational noise impacts are projected and no mitigation is warranted.

XI. PUBLIC SERVICES

- a. The proposed project would not have an effect upon, or result in a need for new or altered fire protection services. Fire protection and emergency medical services are provided by the City of Beverly Hills Fire Department. The Headquarters Fire Station, which is located at 445 North Rexford Drive approximately .25 miles west of the public works facility site, would be the first responding station in the event of an emergency (Industrial Area Plan 1990). The scope of the proposed project is not expected to result in inadequate services associated with the proposed facilities. The project does not contribute to increased exposure to fire hazards and all construction

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would comply with applicable regulations provided in Uniform Fire Code, the California Health and Safety Code and applicable City ordinances which pertain to Fire Protection Systems and Exiting. The City Fire Department would have the opportunity to provide comments on the project design. Any recommendations would be incorporated into project design to maintain fire protection safety.

Emergency access in the project area is currently adequate and would not be affected by the operations of the project. As discussed under Section VI.-“Transportation”, emergency access would be maintained in the area during the construction phases of the project. The proposed project is expected to be adequately served by the existing service capabilities of the City of Beverly Hills Fire. No impacts are anticipated.

- b. The proposed project would not have an effect upon, or result in a need for new or altered police protection services. The scope of the proposed project is not expected to result in inadequate services associated with the proposed facilities. Police services is provided by the Beverly Hills Police Department, which is headquartered on North Rexford Drive in the Civic Center. Slightly higher demands may be generated by the proposed project due to the increase in people employed in the area. However, the public works facility is not expected to attract a substantial amount of visitors to the site. Traffic and pedestrian movements in the area would not substantially increase as a result of the project. The Police Department will have the opportunity to provide comments on the project. Any recommendations would be incorporated into the project design to maintain safety and adequate law enforcement activity.
- c. The proposed project would not have an effect upon or result in the need for new or altered school facilities. The proposed project would not increase population in the area or affect existing school facilities. Therefore, no impacts are anticipated.
- d. The proposed project would have an effect upon, or result in a need for new or altered services associated with the maintenance of public facilities. The proposed project consists of the addition of new water supply and office facilities and thus would likely require periodic maintenance and/or repairs of well head facilities, pipelines, the treatment facility, and other maintenance activities necessary that would be associated with the proposed office building. While these maintenance requirements may be long-term, they are not anticipated to be substantial. The City has considered these potential costs in the planning of the proposed facilities and does not consider this to result in a significant impact.
- e. The project would have a minimal effect upon, or result in a need for new or altered government services associated with the operation of the proposed facilities. The City plans to utilize the design-build-operate-finance model for the treatment facility. Thus, a private entity will develop and operate the facility for a period of time (with

the intent of recovering its investment) prior to turning it back over to the City. The operation of the system is not expected to result in substantial alterations to the existing government structure. Minimal employment requirements are anticipated to operate the facility (approximately 4 additional personnel). The remaining personnel demand would be accommodated by the existing Public Works Department employees. Therefore, this would not be considered to result in a significant impact.

XII. UTILITIES AND SERVICE SYSTEMS

- a. The proposed project would not result in a need for new systems or supplies, or substantial alterations to existing power or natural gas systems. Southern California Edison Company (SCE) currently provides electrical service to the project area and the Southern California Gas Company (SCGC) provides natural gas to the project area.

A combination of aerial and underground electrical transmission lines exists in the vicinity of the project area. A 16 Kilo-volt (Kv) over head transmission circuit runs along Foothill Road from Third Street beyond Alden Drive near the public works facility site (Industrial Area Plan Draft EIR 1990). Additionally, underground transmission lines exist in Civic Center Drive, Foothill Road, and other roads throughout the project area. Most of these underground lines are 16 KV, with fewer 4 KV and 1 KV lines (Industrial Area Plan Draft EIR 1990). The SCE substation located on Third Street just south of the public works facility site is one of the largest in the Los Angeles basin. It should be noted that Edison is currently in the process of under-grounding the overhead lines within the Industrial Area (Sakurai, pers com). SCE is expected to be able to adequately provide electricity for the proposed project.

Natural gas facilities also exist in the project area. SCGC operates 2-inch mains on Burton Way and sections of Civic Center Drive; 3-inch mains run under sections of Beverly Boulevard, Foothill Drive and Civic Center Drive; and 4-inch mains are located along sections of Civic Center Drive and Third Street in the project area. It is expected that the proposed project can be adequately service without significant impacts on service to existing customers.

The proposed public works facility and well sites would require connection to existing electrical facilities in the area. Electrical pedestals (18" square, 4' high) will be installed above ground at the wellhead facilities, which will contain the electric meter and main disconnect switch to allow meter to be read without entering the vault, and provide means for disconnecting the electrical equipment from the utility supply. Additionally, natural gas would be required for domestic purposes to serve the public works facility.

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The two feed pumps for the water treatment facility will be run by a 75 horsepower (hp) motor, and each well will be equipped with a 50 hp electric motor to pump the water from the ground to the treatment plant. The proposed project is anticipated to require 500 Kilowatts (Kw) of electricity (Everest pers comm), and consume approximately 10,458 Kwhrs of electricity per day (Synectecology 1998). However, exact requirements and connections cannot be determined until the final design phase has been completed and submitted to Southern California Edison for review. It is expected that electrical and natural gas requirements for the proposed project could be supplied to the project facilities without resulting in significant impacts. No significant impacts are anticipated.

Construction of the proposed project components may have the potential to impact existing electrical and natural gas facilities. Trenching, excavation, grading, and other construction-related activities may interfere with the buried and overhead facilities. Although significant impacts are not expected, the following mitigation measures would ensure that impacts are substantially reduced:

Mitigation Measures

MM XII-1. Prior to construction activities, the contractor shall coordinate with SCE and SCGC to avoid interference with existing electrical and natural gas facilities.

MM XII-2. During construction phases, if natural gas or electricity to other nearby areas needs to be interrupted, the contractor shall inform affected property owners/operators well in advance of interruption. These activities should be conducted during non-business hours to avoid conflict with other users.

- b. The proposed project would not result in a need for new systems or supplies, or substantial alterations to existing communication systems in the area. Telephone services in the area are provided by Pacific Telephone and AT&T, and cable television service is provided by Century Cable TV (Industrial Area Plan Draft EIR 1990). Both companies currently have aerial and underground lines in the project area. Both overhead and underground telephone trunk lines and cable television lines extend along Foothill Road near the public works facility site. Telemetry and control equipment will be installed in the wellhead vault facilities, which will interface with the treatment plant via direct communication line in the collector pipeline trench. Existing communications and telephone systems are expected to be adequate to serve the proposed facilities. Because these facilities exist in the project area, connection to the systems should be a minor effort.

The construction of the project may affect existing communication facilities due to trenching in streets to accommodate the pipelines. While no adverse impacts are anticipated, the following mitigation measures would help to ensure that no existing facilities are impacted:

Mitigation Measure

MM XII-3. *Prior to construction activities, the contractor shall coordinate with Pacific Telephone and Century Cable to minimize the potential for interference with these services.*

- c. The proposed project would not result in a need for new systems or supplies, or substantial alterations to existing water treatment or distribution facilities in the area. The project includes the provision of new water supply and treatment facilities consisting of wells, pipeline facilities, and a water treatment plant. No major alterations to existing distribution facilities are expected. However, the product water following treatment would be blended with Metropolitan water at the City supply connection prior to distribution throughout the service area. Minor alterations would occur at the City connection site to construct the product water pipeline to connect with the rest of the Metropolitan water supply. This would ultimately result in the project objectives to supplement 20 percent of the City's water supply with groundwater, thus utilizing less Metropolitan water and reducing peaking charges. This would result in a beneficial impact.
- d. The proposed project would not result in a need for new systems or supplies, or substantial alterations to existing sewer facilities in the area. The City's sanitary sewer system is operated by the Beverly Hills Public Services Department. Existing sewer lines in the project vicinity include eight-inch concrete pipes along Burton Way, Foothill Road, Third Street, Civic Center Drive, Beverly Boulevard, Alden Drive, and Maple Drive (Industrial Area Plan Draft EIR 1990). Additionally, ten-inch concrete pipes exist along various sections of Maple Drive Third Street, Burton Way and Alden Drive (Industrial Area Plan Draft EIR 1990). The majority of these lines have been around since the mid-1930's and many sewer lines in the area are exhibiting signs of deterioration (Industrial Area Plan Draft EIR 1990). The proposed water treatment facility would be required to connect to the local sewer system for provisions for domestic use. An 8-inch sewer line is currently located along Foothill Road adjacent to the treatment plant site, which feeds into a 10-inch line at the next block. Although these lines have adequate capacity to accommodate sewage flows, the deteriorated conditions may render them inadequate to handle increased flow (Industrial Area Plan Draft EIR 1990). However, Ken Gettler (pers comm) indicated that the existing system has plenty of capacity to service domestic usage from the public works facility without impacts. No significant impacts are anticipated. Implementation of the following mitigation measures will further reduce

impacts:

Mitigation Measures

MM XII-4. If economically feasible, the City shall replace existing deteriorated concrete pipe sewer lines with like-sized vitrified clay pipe for sewer lines serving the project site.

MM XII-5. The design-builder shall implement the use of water conservation measures to reduce the amount of wastewater flow generated by the project. These may include, but are not limited to the following:

- *Use of ultra-low volume toilets (1.5 gallons per flush);*
- *Use of low-flow faucet fixtures; and*
- *Use of self-canceling faucet handles.*

The brine from the water treatment plant will not be discharged into the sewer system, but rather the storm drainage system. A discussion of storm drainage is discussed below. No significant impacts are anticipated.

- e. The proposed project would not result in a need for new systems or supplies, or substantial alterations to existing storm water drainage systems in the area. The project area is served by a combination of street flow and underground reinforced concrete pipe storm drains that date back to the 1960s (Industrial Area Plan Draft EIR 1990). Existing storm drains are along Beverly Boulevard, Maple Drive and Foothill Road in the project vicinity. The storm drains under Foothill Road are 18 and 27 inches in diameter. No localized flooding problems are known to exist near the proposed public works facility site. Existing runoff is easily accommodated within the existing storm drainage system (Industrial Area Plan Draft EIR 1990).

The proposed project would not contribute to increased permeability to result in increased surface runoff as the existing condition of the public works facility site is paved concrete. The proposed project would involve construction of a short concentrate disposal line of 8-inch diameter pipe along Foothill Road connecting the treatment plant discharge to the 27-inch Los Angeles County Flood Control District (LACFCD) storm drain at Third Street. Substantial alterations to the storm drain are not anticipated. This disposal method was determined as the least costly and to have the least impact on the environment during previous studies. Storm water near the treatment plant area would drain in a southwesterly direction to the Benedict Canyon Channel and then to the Ballona Creek ending in Playa Del Rey (City of Beverly Hills Municipal Water Supply and Groundwater Study, Preliminary Design Report [PDR] 1993).

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In early 1994, Los Angeles Regional Water Quality Control Board (LARWQCB) was contacted for guidance about the feasibility of concentrate discharge to the storm drain. The chief of the coastal water section at that time, responded that additional water quality data was required for the potential discharge water and a permit application must be filed before they can issue a statement of acceptability. After completion of the pilot testing and water quality sampling, Boyle Engineering contacted the LARWQCB and submitted water quality data for their review. Dennis Dasker, the staff member responsible for the permit for the City, responded that the water quality of the concentrate meets the general discharge requirements. The staff also indicated that they have no reasons to disapprove the discharge, and recommended that the City file a formal application as soon as the project is in the design phase (City of Beverly Hills Groundwater Development Program, Pilot Testing Report 1996). The proposed project will require approval of an NPDES permit. A temporary construction NPDES permit will be required from the LARWQCB, and a connection permit from LACFCD is also required to discharge water to its storm drain system. Implementation of *MM IV-1* through *MM IV-3* would reduce any potential impacts to less-than-significant levels.

- f. The proposed project would not result in a need for new systems or supplies, or substantial alterations to existing solid waste disposal services in the area. Solid and liquid wastes would be generated from the site during construction and operation of the project.

During the construction phases of the project, solid waste in the form of solid- drill cuttings and debris would be removed by the contractors to an appropriate off-site disposal (landfill). Liquid waste includes muddy water and clean water during development of the well. Approximately 4,000 gallons of muddy water is estimated to be generated from construction and testing of the wells, and would be hauled away by the contractor to an appropriate disposal site. Clean water will be pumped and discharged to a nearby storm drain. A temporary construction NPDES permit will be required from the California LARWQCB, as well as a connection permit from LACFCD to discharge water to its storm drain system. No significant adverse impacts are anticipated.

During operations of the proposed project, a minimal amount of domestic refuse is expected to be generated from the public works facility. It is anticipated that this service can be provided by the existing solid waste disposal services throughout the City. No impact is anticipated.

The operation of the treatment plant would remove iron and manganese from the groundwater. The air stripping process would produce a residual sludge that would be disposed of in land fills. These materials would undergo the proper handling and disposal protocol. The sludge would not be handled by the domestic refuse services.

Environmental Analysis and Discussion of Impacts

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Additional trucks, approximately one per week, would visit the site to collect and dispose of the sludge in nearby landfills. No significant impacts would result.

- g. The proposed project would not result in a need for new systems or supplies, or substantial alterations to existing local or regional water supplies. The project includes the provision of a new supplemental water supply consisting of wells, pipeline facilities, and a water treatment plant.

Minor alterations to existing local and regional water supplies would occur as the project decreases the amount of water dependent from Metropolitan by approximately 20 percent and supplements the supply with groundwater. Both the City and Metropolitan view this proposed project as beneficial as it creates a more reliable water supply for the service area, and it will reduce peaking charges to create an economic benefit for the City. The project will also be considered in Metropolitan's Groundwater recovery program, which maintains a financial incentive program that assists member agencies in the development of alternative water sources by providing a maximum of \$250 per acre-foot of newly developed water. The product water, following treatment, would be blended with Metropolitan water at the City supply connection prior to distribution throughout the service area. The creation of a supplemental water supply system would create a more reliable water supply, and result in beneficial impacts.

XIII. AESTHETICS

- a. The construction of the proposed wells along Santa Monica Boulevard could result in a temporary impact on a scenic highway. The City of Beverly Hills designates Santa Monica Boulevard as a Scenic Highway in the City's General Plan. Temporary aesthetic impacts may occur during construction of the project components as construction equipment, vehicles, blockades, and construction debris may be visible from drivers and pedestrians along Santa Monica Boulevard. Following construction, all areas would be landscaped and surface features would be minimal and unobtrusive. Currently there are no general plan policies in regards to this scenic highway. No significant impacts are anticipated.
- b. The proposed project would not result in a demonstrable negative aesthetic impact. Figure 4 illustrates the existing and proposed well sites; Figure 5 shows the proposed public works facility site and the proposed pipeline routes along Maple Drive and the alley between Alpine Drive and Rexford Drive; and Figure 6 illustrates the alternate well site location and the alternate pipeline routes.

The existing well and one of the proposed well sites (shown in Figure 4, [a] and [b]) are located within the Burton Way median. This area is currently characterized by

its grassy landscape with sparsely populated trees. High density multi-family residential uses line the north side of Burton Way, and high density single-family residential uses are located along the south side of the street in the well locations. A relatively high volume of traffic can be observed along this street with two lanes of traffic in each direction.

One of the other well sites is located in the Civic Center Drive right-of-way just east of its intersection with Beverly Boulevard (shown in Figure 4, [c]). Civic Center Drive at this point has been blocked-off as a dead end street at Beverly Boulevard. High-density multi-family residential property is located adjacent to the southeast of the site. The north of Civic Center Drive along this two lane street exists a virtually bare strip of land containing trees and shrubs lining the south side for its length between Beverly Boulevard and Doheny Drive. This railroad ROW has been abandoned, but remnants of railroad tracks can be found as evidence of its existence.

Beyond the railroad ROW to the north is Santa Monica Boulevard. With two lanes in each direction, it is one of the major thoroughfares through the City. Its intersection with Beverly Boulevard in the immediate area is rather busy. Across Santa Monica Boulevard is Beverly Gardens Park. This unique stretch of open space contains lush landscaping and creates a visually appealing resources for nearly the width of the City from Doheny Drive to Wilshire Boulevard. A pedestrian trail extends the length of the Park and is highly utilized by residents, visitors, and transients in the area. Beverly Gardens Park, while serving as an important recreational resource also provides a valuable passive open space setting along Santa Monica Boulevard. An approximately 6½-foot block wall lines the northern boundary of the Park separating it from the medium-density single-family residential properties that lie beyond.

The fourth well site would be located in Doheny Park (shown in Figure 4, [d]). This Park sits as an island parcel surrounded on all sides by streets (Carmelita Avenue, Santa Monica Boulevard, Doheny Drive, and Oakhurst Drive). Low-density multi-family residential uses lie to the north of this site and medium-density single-family residential areas lie to the west and northwest. Commercial properties can be found to the south and east, and Beverly Gardens Park extends westbound along Santa Monica Boulevard from this parcel. This location sits amidst the rather busy intersection as a rather highly developed commercial area of West Hollywood extends to the east from this site. This site also contains lush landscaping, with plenty of open grassy areas. A distinctive fountain sits roughly in the middle of this Park, visible from all sides. Several people were observed enjoying the Park during reconnaissance surveys.

Well water pipelines would be located roughly in the areas as described above leading to the public works facility site (shown in Figure 5, [c]) in the Industrial Area



A) EXISTING WELL SITE IN BURTON WAY MEDIAN WEST OF FOOTHILL ROAD.



B) PROPOSED WELL SITE IN BURTON WAY MEDIAN JUST WEST OF OAKHURST DRIVE.

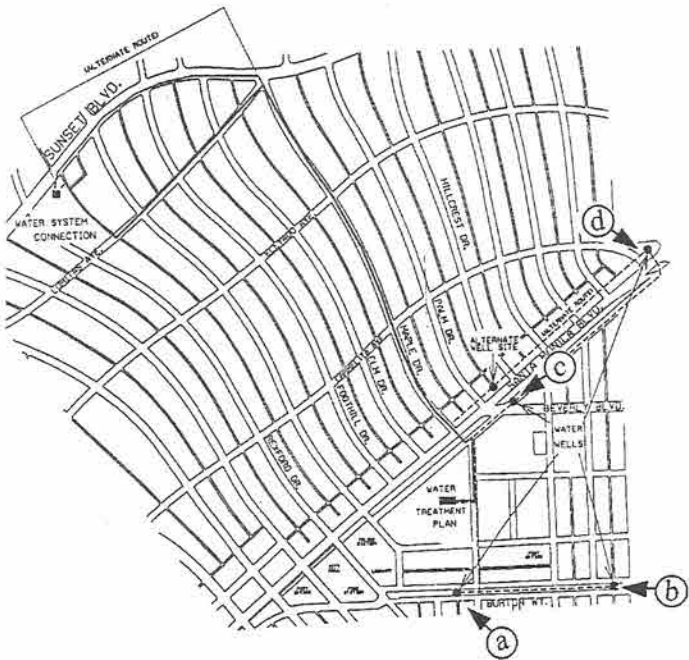


C) PROPOSED WELL SITE IN CIVIC CENTER DRIVE RIGHT-OF-WAY JUST EAST OF BEVERLY BOULEVARD.



D) PROPOSED WELL SITE IN DOHENY PARK.

PHOTO MAP INDEX



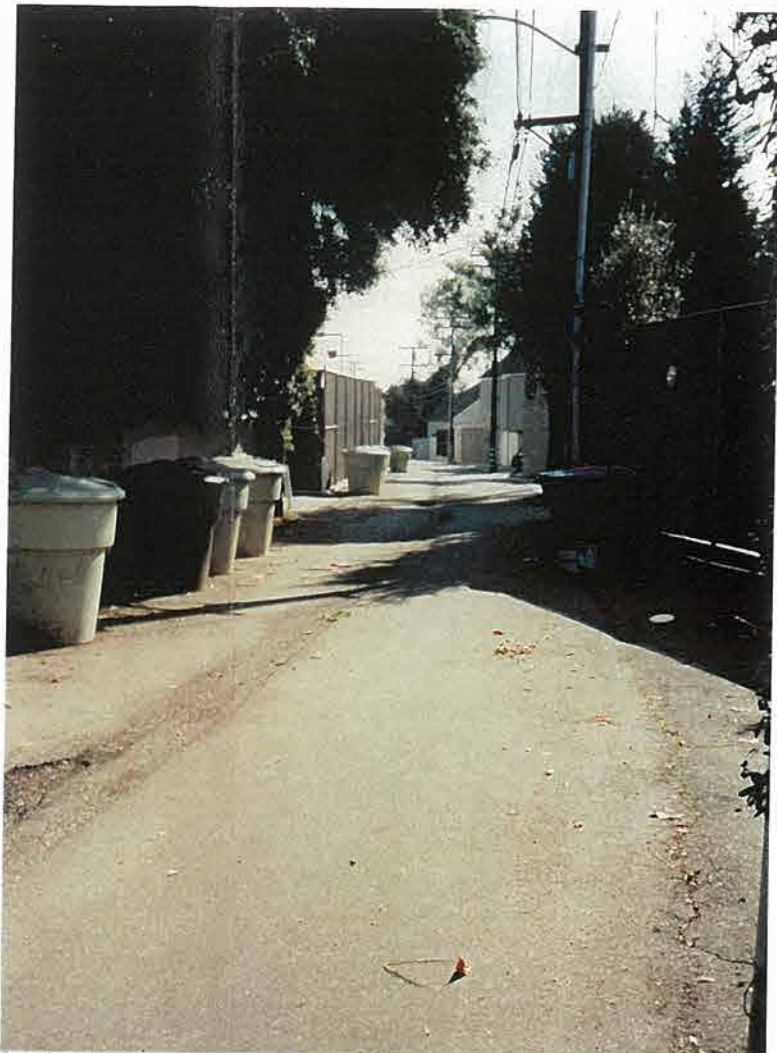
WELL SITES
Figure 4



Jones & Stokes Associates, Inc.



A) PROPOSED PRODUCT WATER PIPELINE ROUTE ALONG MAPLE AVENUE.

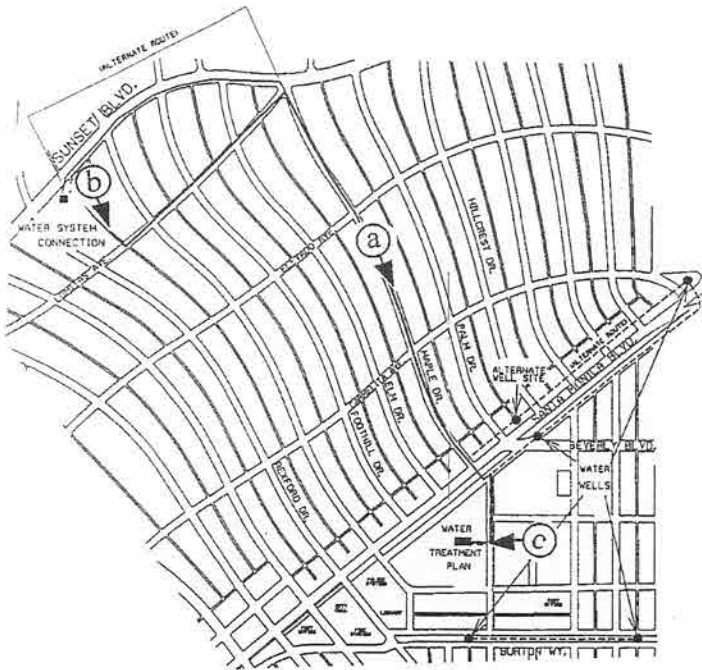


B) PROPOSED PRODUCT WATER PIPELINE ROUTE IN ALLEY NORTH OF LOMITAS AVENUE BETWEEN REXFORD DRIVE AND ALPINE DRIVE.



C) PROPOSED TREATMENT PLANT/OFFICE BUILDING SITE.

PHOTO MAP INDEX



TREATMENT PLANT/OFFICE BUILDING SITE AND PIPELINE ROUTES
Figure 5



Jones & Stokes Associates, Inc.



A) ALTERNATE WELL SITE IN BEVERLY GARDENS PARK.

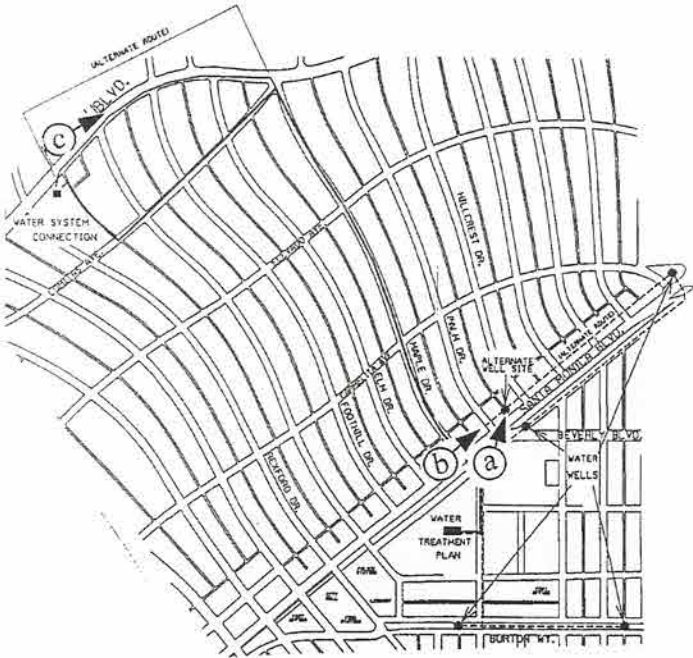


C) ALTERNATE PRODUCT WATER PIPELINE ROUTE ALONG SUNSET BOULEVARD.



B) ALTERNATE WELL WATER PIPELINE ROUTE THROUGH BEVERLY GARDENS PARK.

PHOTO MAP INDEX



ALTERNATE WELL SITE
AND PIPELINE ROUTES
Figure 6

of the City. This area is physically distinct district in the City which incorporates a diversity of public and private uses, emphasizing those which support the community. The area is dominated by commercial, industrial and municipal land uses and are aesthetically typical of an urban setting (Industrial Area Plan Draft EIR 1990). An industrial architectural character exists in the area, which is slowly being transitioned to incorporate a higher level of architectural quality. Building heights in the area vary from one to six stories and street trees in the area are abundant and well maintained. The public works facility site is currently vacant and improved with an asphalt parking lot for City vehicles. Multi-story office structures can be seen across the site to the west, in which the occupants have high visibility onto the project site. Adjacent to the north is the veterinary hospital, to the south is the existing City Yard, and the existing Public Works offices are located east across Foothill Road.

The product water pipeline would roughly follow some of the areas described above until it crosses Santa Monica Boulevard. This pipeline would extend northbound along Maple Drive for several blocks through the medium-density multi-family residential area (shown in Figure 5, [a]). The pipeline would then turn west along Lomitas Avenue, and then northbound again through the alley between Rexford Drive and Alpine Drive up to the Metropolitan connection with the City water supply. This residential area is characteristic of unique custom homes and an abundance of street trees that line the entire block. Lush front-yard landscaping in combination with the street trees provides a highly pleasant environment throughout the residential districts.

The short segment of the pipeline proposed within the alley has less visual quality than the tree-lined streets (shown in Figure 5, [b]). The alleys abut the rear end of residential properties in the area and are mostly utilized for utilities, public services such as refuse storage and pick-up, and vehicular and pedestrian access. Some residential structures back up to the rear property line, while others have large rear yards as buffers from the alleys.

The alternate well site could be located within Beverly Gardens Park. A description of the general aesthetic environment for the Park is provided above. Figure 6, [a] shows the location of the alternate well site. Additionally, the alternate groundwater pipeline would extend through Beverly Gardens Park for the length between the proposed site at Doheny Drive and this alternate site. This area is illustrated in Figure 6, [b]. The alternate product water pipeline route could extend west along Sunset Boulevard from Maple Drive, rather than turning west at Lomitas Avenue. Sunset Boulevard is a rather busy four-lane road with wide grassy medians similar to Burton Way (shown in Figure 6, [c]). Most of the residential properties along Sunset Boulevard in this area have large fences and walls to reduce noise from the high traffic volumes.

Construction activities at the well locations, along the pipeline routes, and at the public works facility site would result in temporary aesthetic impacts. These short-term aesthetic impacts may affect nearby residents and by-passers during construction for a period of approximately three months. The most significant of these locations would be the proposed well site in Beverly Gardens Park at the Doheny site and the potential alternate site in Beverly Gardens Park. These park areas are some of the most valuable and most visible aesthetic resources in the area and construction activity would affect the value of these areas temporarily. During construction, 20-foot-high noise reduction enclosures will be placed around the well sites (approximately 60' x 100' area) that will also help to alleviate the potential adverse aesthetic impacts from construction activities. These enclosures will preclude views of the construction equipment and debris from well head development activities. These short-term aesthetic impacts are considered to be less-than-significant due to the temporary nature and the provisions for screening the construction sites further reduce potential impacts.

The development of the public works facility site would be considered to result in fewer aesthetic impacts as the general aesthetic quality of the area is not considered to be as valued. This area is characteristic of an industrial area and construction activities would not be highly visible to sensitive receptors. This is because residents are not located in the immediate area and the area is not frequently traveled (as opposed to the visibility of sites along Santa Monica Boulevard and Burton Way, which have high traffic volumes). However, occupants of the upper floors of the office buildings to the west have a bird's eye view of the project site and may experience temporary effects of construction activities. Because of the existing character of the site as a vacant parking lot and the other surrounding land uses, the construction of the project would not be expected to result in significant aesthetic impacts.

Long-term aesthetic impacts are not anticipated for the well sites. Well facilities that will be located above-ground will be minimal and will consist of an electric pedestal (18" square, 4' high), and venting facilities (six-inch vent about 7.5 feet high, with a well vent in the same enclosure, which will be 30-inch diameter and five feet high). These exposed well head facilities would be unobtrusive because following construction of the proposed wells, the sites will be restored and approved landscape plans will be implemented to screen the above ground facilities from direct view. No significant adverse impacts are anticipated.

The proposed public works facility would be located in the City's Industrial Area, which is surrounded by commercial and industrial office uses, a veterinary hospital, utilities, and other municipal uses, such as the City's Public Works Department and City Yard. Short-term construction impacts may have minor effects on neighboring land uses. However, construction of the proposed facility would not substantially

differ from the construction of other facilities in the area and sensitive receptors would not be affected. The proposed use would be compatible with the surrounding land uses and the structure would adhere to quality architectural standards. No significant adverse impacts are anticipated.

- c. The proposed project may create light or glare. During construction and testing at the well sites, workers may be present at the sites on a few occasions for a 24-hour period, which would require lighting during night-time hours. Implementation of the construction screening discussed earlier would reduce potential impacts to adjacent residents to a less than significant level.

During operation, the proposed well facilities would be located mostly underground. The above-ground components would be screened by landscaping and would not require lighting. It is not expected that night time activities would occur at the well head facilities during operational phases of the project. No impacts are anticipated.

Lighting would be incorporated into the site design of the proposed public works facility for night use and safety. The existence of this proposed facility would add to the overall lighting in the area. However, the proposed lighting would not be an extraordinary amount, and sensitive receptors would not be affected. Substantial glare would not be created by the project. The structure would only be two-stories in height (45 feet) and reflective glass would not be incorporated into the project design. Significant adverse impacts are not anticipated.

XIV. CULTURAL RESOURCES

- a,b,c. The proposed project is not anticipated to disturb paleontological, archaeological, or historical resources. During previous surveys for the Industrial Area of the City, 15 structures were recorded that are representative of the styles and type of structures present during the area's prime period of growth, 1922-1940; two of which were found to retain sufficient historic architectural integrity to be representative of the styles and types of structures erected in the area during its period of historical significance (Industrial Area Plan Draft EIR 1990). Within the immediate project area, the Payne Building, located across from the proposed public works facility site at 336 Foothill Road, was listed as "potentially eligible" for inclusion in the National Register of Historic Places. However, at this time it is not officially on the list. No known cultural resources are present at the proposed construction sites. However to ensure that no impacts occur to previously undiscovered cultural resources during construction, the following mitigation measures have been incorporated into the project:

Mitigation Measure

MM XIV-1. During construction, the contractor shall halt all construction activities if potential cultural resources are uncovered and a qualified archaeologist shall be contacted to analyze the potential resource to make a determination of its significance. If this were to occur, the archaeologist shall monitor subsequent construction activities at all sites during the excavation and grading phases of the proposed project.

- d,e. The proposed project would not have the potential to cause a physical change which would affect unique ethnic cultural values, or restrict existing religious or sacred uses within the area. No religious or sacred uses would be affected by the proposed project, nor would religious or sacred activities be suppressed through the implementation of the project. No significant impacts would occur.

XV. RECREATION

- a. The proposed project would not result in the demand for neighborhood or regional parks or other recreational opportunities. Generally, demand for new parks would occur if a project would contribute to population growth within an area or existing parks are eliminated. The proposed project would not create a demand for new parks or recreation facilities. No significant impacts would occur.
- b. Existing recreational opportunities may be affected by the proposed project. Construction activities within the Burton Way median and within Beverly Gardens Park may be temporarily affected during construction and testing of the groundwater wells. The Burton Way median, may potentially be utilized as a recreational resource for walkers, runners and other passive recreational activities. Beverly Gardens Park is a valuable recreational resource that is heavily utilized for both passive and active recreational purposes. Construction of the project may result in temporary short-term impacts to the existing recreational amenities and passive open space within the project area. Construction of the proposed well site in Beverly Gardens Park at Doheny Drive would reduce the amount of available space within the park for temporary periods during construction. This would also contribute to potentially adverse aesthetic quality of the park during these construction phases.

If the alternate well site in Beverly Gardens Park is chosen, this would also result in temporary impacts to the Park and its users. This area is heavily traveled by pedestrians along the pedestrian trail that extends the length of the park. Pedestrians utilizing the Park and this trail would experience temporary adverse aesthetic impacts

resulting from construction activities. However, recreational opportunities would not be constrained. Furthermore, following the construction phases of the project, well sites and pipeline routes would be re-landscaped and be camouflaged to integrate into the aesthetic quality of the park. No significant impacts would occur.

XVI. MANDATORY FINDINGS OF SIGNIFICANCE

- a. The proposed project would not 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. The project area is highly urban in character and does not contain biological resources that would be affected through the implementation of the proposed project. Additionally, no cultural resources, neither historical or prehistorical, would be affected by the proposed project. No significant impacts are anticipated.
- b. The proposed project would not have the potential to achieve short term, over the disadvantage of long term environmental goals. The proposed project would contribute to the long term advantage of environmental goals through creating a supplemental water supply for the service area and reducing overall costs associated with receiving water from Metropolitan. Short-term construction impacts would be terminated following construction phases of the project. No significant impacts are expected to result from the extraction of the safe yield (3,000 acre-feet annually) of groundwater from the Hollywood Basin.
- c. The project would not have impacts that are cumulatively considerable. The City of Beverly Hills is the only agency that has historically extracted groundwater in the area, and is the only agency that is proposing to extract groundwater from the Hollywood Basin in the foreseeable future. No cumulative impacts are anticipated.
- d. The proposed project would not have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly. No significant adverse impacts have been identified for the proposed project. Additionally, several mitigation measures have been incorporated into the proposed project which would reduce potential impacts of the project to less-than-significant levels.

Mitigation Measures That Have Been Incorporated Into The Project Design

In order to reduce any potentially significant impacts associated with the proposed project, the following mitigation measures have been incorporated into the proposed project design.

III. GEOLOGIC PROBLEMS

There is a potential for liquefaction to occur. The effects of liquefaction can be mitigated to less-than-significant levels. Depending on the severity of the potential for liquefaction to occur, some or all of the mitigation measures presented below could be implemented. Geotechnical studies shall be performed prior to issuance of building permits and specific engineering requirements will be developed to reduce potential impacts of liquefaction. Any geotechnical recommendations shall be incorporated into the project design and adhered to during the construction of the facility.

- MM III-1. Use of driven pile foundations may mitigate settlements; piling should be designed for downdrag loads imposed by settlement of soil.*
- MM III-2. Underground elements of substructures can be designed for increased lateral pressure and uplift pressure caused by liquefaction.*
- MM III-3. Where appropriate, in-place densification techniques such as : vibroflotation, dynamic compaction, combined densification/drainage (compaction piles), and vertical drains (stone columns) may be used to improve subsurface soil stability.*

The following mitigation measures will reduce potential erosion impacts to less-than-significant levels:

- MM III-4. During construction phases, the contractor will implement wheel washing for trucks and other construction equipment prior to the equipment and vehicles exiting the construction site.*
- MM III-5. During construction phases, the contractor will be responsible for street cleaning in the construction areas at least once per week as needed.*

IV. WATER

- MM IV-1. Prior to issuance of the building permit for the public works facility, the City shall obtain an NPDES permit;*

Mitigation Measures That Have Been Incorporated Into The Proposed Project

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- MM IV-2. Prior to construction of the well head facilities and groundwater testing, the contractor shall obtain an NPDES permit for temporary discharge of test water into the storm drainage system.*
- MM IV-3. During the operations of the project, the City shall conduct ongoing monitoring efforts to assure that the level of treatment is in compliance with the NPDES permit.*

V. AIR QUALITY

- MM V-1. During Phase I construction, construction activities shall be limited to the development of not more than two wells simultaneously. If the City wishes to construct all four wells simultaneously, then all heavy construction equipment to be used simultaneously should be calibrated with 2-4 degrees of fuel injection retard and equipped with high pressure fuel injectors⁵. The City could also opt to restrict construction of the wells to no more than 24 total hours (or 6 hours for each well) on a daily basis⁶.*
- MM V-2. During Phase II of construction, construction site preparation construction activities shall be limited to the construction of the public works facility or the pipelines at any given time. If the City wishes to conduct site preparation activities for both the pipelines and the public works facility simultaneously, then all heavy construction equipment to be used simultaneously should be calibrated with 2-4 degrees of fuel injection retard and equipped with high pressure fuel injectors⁷. The City could also opt to limit heavy construction equipment use to no more than 88 total hours on a daily basis⁸.*

⁵ Fuel injection retardation can be performed on heavy construction equipment diesel engines and would require recalibration of the engines' fuel injection system. Provision of high pressure fuel injectors for the construction equipment would require that the existing injectors be removed by disconnecting the fuel rail of individual fuel lines (depending on the engine design), removing the existing injectors, and replacing these with the high pressure units. To supply the high pressure necessary to make the replaced injectors work properly could require the recalibration of the fuel pressure regulator, and perhaps replacement of the fuel pump and resizing of the fuel delivery and return lines. All work should be performed by a competent, certified diesel mechanic.

⁶ If the City will restrict well construction equipment use to no more than 24 total hours (6 hours each well) on a daily basis, all criteria pollutants should remain within their respective thresholds allowing simultaneous construction of all four wells. Based on a threshold of 100 lbs./day and 2.5 tons/quarter for NOx. This could best be monitored by requiring the contractor to log daily equipment hours and restrict these hours to 24. This would enable the contractors to be on-site for other construction activities even if they are not using heavy equipment.

⁷ Same as Footnote 4.

⁸ If the City will restrict heavy equipment use to no more than 88 total hours on a daily basis, all criteria pollutants should remain within their respective thresholds allowing simultaneous construction site preparation activities for the public works facility and the pipelines. Based on a threshold of 100 lbs./day and 2.5 tons/quarter for NOx. This could best be monitored by requiring the contractor to log daily equipment hours and restrict these hours to 88. This would enable the contractors to be on-site for other construction activities even if they are not using heavy equipment.

VI. TRANSPORTATION/CIRCULATION

- MM VI-1. Prior to construction activities, the contractor shall post the occurrence of roadway construction activities well in advance of construction so that motorists can take alternative routes;*
- MM VI-2. During construction phases, the contractor shall curtail lane closures to the fullest extent possible during peak hours (7:00 a.m. to 9:00 a.m., and 4:00 p.m. to 6:00 p.m.);*
- MM VI-3. Prior to construction activities, the contractor in conjunction with the City Public Works Department shall develop detour routes where possible;*
- MM VI-4. During construction activities, the contractor shall use flag persons where appropriate; and*
- MM VI-5. During construction phases, the contractor shall ensure that the pipeline trenches are covered, and access maintained during non-working hours.*
- MM VI-6. During construction phases, the contractor in conjunction with City staff shall inform emergency agencies, such as fire and police, as well as affected business and residents, as to any road closure.*
- MM VI-7. During construction activities, the contractor shall maintain alternative access for emergency vehicles.*
- MM VI-8. Same as MM VI-5. During construction phases, the contractor shall ensure that the pipeline trenches are covered, and access maintained during non-working hours.*
- MM VI-9. The City Public Works management shall coordinate a parking program to encourage employees at the proposed facility to park in the existing City parking structure to compensate for the parking deficiency.*
- MM VI-10. During the construction phases, the contractor in conjunction with the City shall designate parking areas for construction workers to reduce any potential impact on parking capacity;*
- MM VI-11. During construction activities, the contractor shall implement parking control within pipeline construction areas (i.e., posting signs in advance, notifying residents individually, identifying alternative parking areas, etc.); and*
- MM VI-12. During construction phases, the contractor in conjunction with the City shall designate alternative parking areas, if necessary.*

Mitigation Measures That Have Been Incorporated Into The Proposed Project

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- MM VI-13. During the construction phases, the contractor shall place barriers and other protective equipment to preclude bicyclists and pedestrians from entering the construction areas;*
- MM VI-14. During the construction phases, the contractor in conjunction with the City shall identify and post alternative bicycle and pedestrian routes; and*
- MM VI-15. During the construction phases, the contractor shall notify the schools in the area of potential hazards along school routes to ensure the safety of students.*

IX. HAZARDS

- MM IX-1. Prior to construction and issuance of building permits, the design-build contractor shall develop and have approved a pollution prevention and control plan. This plan shall outline methods for storage and use of hazardous materials to reduce the potential as well as the consequences of any accidental spill. The plan shall also provide procedures for cleanup of any potential release. This plan shall include placement of clean up materials and procedures for minor spills, as well as outlining a series of procedures for notification of neighbors and agencies and clean-up of any spills.*

X. NOISE

Significant noise impacts would not occur as long as construction is restricted to between the hours of 8:00 a.m. and 6:00 p.m. and not on Sundays, legal holidays, and Saturdays within 500 feet of residential areas. The following mitigation measures have been recommended to further reduce noise impacts, but are not required.

- MM X-2. During construction phases, the contractor shall strive to use the quietest equipment available. All internal combustion powered equipment should be equipped with properly operating mufflers and kept in a proper state of tune to alleviate back-fires. For that equipment installing pipelines north of Santa Monica Boulevard, engines are recommended to be fitted with protective shrouds to reduce motor noise.*
- MM X-3. During construction activities, portable equipment should be located as far as possible from the adjacent residents.*
- MM X-4. During construction phases, equipment should be stored and maintained as far as possible from the adjacent residents.*

Mitigation Measures That Have Been Incorporated Into The Proposed Project

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- MM X-5. During construction activities, noise curtains are recommended to be used for construction and testing of wells, and all pipeline construction north of Santa Monica Boulevard.*
- MM X-6. Prior to construction activities, the contractor, in conjunction with the City, should implement a public awareness program to alert the public of the upcoming construction disturbance.*
- MM X-7. The City should identify a disturbance coordinator that would be responsible for responding to noise complaints.*

XII. UTILITIES AND SERVICE SYSTEMS

- MM XII-1. Prior to construction activities, the contractor shall coordinate with SCE and SCGC to avoid interference with existing electrical and natural gas facilities.*
- MM XII-2. During construction phases, if natural gas or electricity to other nearby areas needs to be interrupted, the contractor shall inform affected property owners/operators well in advance of interruption. These activities should be conducted during non-business hours to avoid conflict with other users.*
- MM XII-3. Prior to construction activities, the contractor shall coordinate with Pacific Telephone and Century Cable to ensure that interference with these services does not occur.*
- MM XII-4. If economically feasible, the City shall replace existing deteriorated concrete pipe sewer lines with like-sized vitrified clay pipe for sewer lines serving the project site.*
- MM XII-5. The design-builder shall implement the use of water conservation measures to reduce the amount of wastewater flow generated by the project. These may include, but are not limited to the following:*
- Use of ultra-low volume toilets (1.5 gallons per flush);*
 - Use of low-flow faucet fixtures; and*
 - Use of self-canceling faucet handles.*

XIV. CULTURAL RESOURCES

- MM XIV-1. During construction, the contractor shall halt all construction activities if potential cultural resources are uncovered and a qualified archaeologist shall be contacted to analyze the potential resource to make a determination of its significance. If this*

Mitigation Measures That Have Been Incorporated Into The Proposed Project

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were to occur, the archaeologist shall monitor subsequent construction activities at all sites during the excavation and grading phases of the proposed project.

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APPENDIX A

Air Quality Analysis

AIR QUALITY ANALYSIS
PREPARED FOR THE CONSTRUCTION AND OPERATION
OF THE CITY OF BEVERLY HILLS
MUNICIPAL WATER AND PUBLIC WORKS PROJECT

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1.0 OVERVIEW

The following presents the results of an air quality analysis performed in support of the Initial Study prepared for the construction of water wells, associated pipelines, and a treatment facility along with a Public Works office building to be located within the City of Beverly Hills. The project includes the construction and operation of four wells used to supply municipal water for local use. Obtained water would be treated through reverse osmosis. Currently, the treatment facility is projected to process as many as 3.5 million gallons of water per day but shall be designed with a capacity of 5.0 million gallons per day. When complete, the facility would supply approximately 20 percent of the City's water demands. At this time it is estimated that approximately 87 percent of the water (based on previous studies) could be brought up to drinking water standards and this portion of the water would be blended with water from the Metropolitan Water District at its connection near Sunset Boulevard and Rexford Drive. The remaining approximately 13 percent would contain most of the dissolved minerals and would be discharged into the storm drain system.

The included study is prepared to the level of detail necessary for CEQA review to determine if the project would create any significant air quality impacts. The air quality study includes a discussion of applicable rules and regulations, a description of the existing setting, a discussion of threshold criteria levels, and an impacts analysis for both the construction and subsequent operational phases of the project.

The study concludes while construction has the potential produce significant air quality impacts, implementation of the recommended mitigation measures will reduce these to a level that is less than significant. No significant impacts are associated with project operation and no further mitigation is warranted.

2.0 Environmental Setting

2.1 Meteorology/Climate

The climate in the project area, as with all of Southern California, is largely governed by the semi-permanent high pressure center near Hawaii and the moderating effects of the Pacific Ocean. The climate is characterized by moderate summer temperatures, mild winters, frequent morning coastal clouds, infrequent rainfall confined mainly from late fall to early spring, and moderate onshore breezes. The same conditions that create a desirable living climate also combine to severely restrict the ability of the local air shed to disperse the air pollutants generated by the large population. The project area, being semi-coastal, is protected from the worst of the air pollution problems by the daily sea breeze that brings in clean air and blows pollutants inland, but recirculation of polluted air and incomplete ventilation of the Basin can cause smog alerts even in coastal communities.

Two meteorological parameters are important in assessing the air quality impacts of emissions generated within in the project area. These are the winds which control the rate and trajectory of

horizontal transport and the vertical stability structure (inversions) which control the vertical depth through which the pollutants are mixed.

Winds across the site travel in two distinct directions: 1) a strong onshore wind by day which is strongest in summer, and 2) a weak offshore wind which is strongest in winter when nights are long and the land becomes cooler than the ocean. The net effect of this wind pattern is that daytime air pollution emissions from near the proposed project site are carried inland toward downtown Los Angeles and then they diverge into the eastern San Fernando Valley and the western San Gabriel Valley.

The nocturnal winds reverse the process as they recycle the previous day's pollution and carry diluted pollutants seaward. In contrast to the strong daytime flow, the weak nocturnal winds also allow for localized stagnation of pollutants near their source such as freeways or other concentrations of emissions.

In addition to the two characteristic wind patterns, there are two corresponding temperature inversions that trap pollution within shallow layers near the ground. The first is created when daytime onshore cool ocean air undercuts a massive dome of warm air within the Pacific high pressure system. This process creates marine/subsidence inversions that form a lid at about 1,000 feet above the surface over the entire Los Angeles Basin. These inversions allow for the mixing of pollutants near their source, but they trap the entire Basin's emissions within the shallow marine layer. As the relatively clean marine air moves inland, pollution sources continually add contaminants from below without any dilution from above. Reactive organic gases and nitrogen oxides combine under abundant sunlight to form photochemical smog. Smog levels increase steadily from the coast inland until the inversion is broken by strong surface heating and by thermal chimneys created along the heated slopes of the mountains surrounding the Basin.

The second major inversion type forms during long, cloudless nights as cold air pools near the surface while the air aloft remains warm. The radiation inversions from this second type are very shallow and contribute to the "hot spot" potential near ground level sources, especially vehicular source concentrations. (A "hot spot" is a high concentration of pollutants trapped in a cooler air pocket with limited dispersion characteristics.) Measurements of inversion frequency at Santa Monica Airport show a strong diurnal and seasonal variation of inversion distributions.

Regional trapping inversions (the first type) occur on about 85 percent of all summer afternoons while ground-level radiation inversions (the second type) are found on about 70 percent of all winter nights and early mornings. Both of these inversion types occur during all seasons and at all times of the day, but they are not as strong, persistent, or frequent as during their summer afternoon and winter morning dominant periods.

2.2 Air Quality Setting

2.2.1 Ambient Air Quality Standards (AAQS)

Air quality impacts of the proposed project, combined with existing background air quality levels, must be compared to the applicable ambient air quality standards in order to gauge their significance. These standards are the levels of air quality considered safe, with an adequate margin of safety, to protect the public health and welfare. Those standards currently in effect in California are shown in Table A-1.

2.3 Existing Air Quality

Existing levels of ambient air quality and historical trends and projections in the project area are best documented by measurements made by the South Coast Air Quality Management District (SCAQMD) at its West Los Angeles air monitoring station. Monitored air pollutants include ozone, carbon monoxide, AND nitrogen oxides (NO_x). Sulfur dioxide and PM₁₀ particulates are not monitored at this station and presented data for these pollutant species are from the North Main Street station in Los Angeles, the closest station which regularly monitors this parameter. (Note that Beverly Hills actually straddles these two monitoring areas with La Cienega Boulevard being the dividing line.)

It is expected that the project area would have lower readings than the North Main Street station readings due to its more-coastal location. (All pollutants that are monitored at both stations show lower values for the West Los Angeles station.) Recent monitoring data (1992-1996) from these stations are summarized in Table A-2. These data show recurring violations of both the federal and State hourly standard for ozone (O₃) and State standard for PM₁₀ particulate matter. No first stage smog alerts (i.e., 0.20 ppm ozone for an hourly exposure) have been reported in the past 5 years at either the West Los Angeles or Los Angeles monitoring stations. While the summer ozone levels are occasionally unhealthful, they are lower than inland communities.

Levels of primary automobile pollutants, such as CO, have not exceeded their standards in the last 5 years. The data, in general, show that improvement has occurred throughout the 1990s in the western coastal portions of the Los Angeles Basin. However, desirable levels have not yet been attained for some pollutants.

Table A-1
AMBIENT AIR QUALITY STANDARDS

Pollutant	Averaging Time	California Standards		Federal Standards		
		Concentration	Method	Primary	Secondary	Method
Ozone	1 Hour	>0.09 ppm (180 ug/m³)	Ultraviolet Photometry	>0.12 ppm (235 ug/m³)	Same as Primary Std.	Ethylene Chemiluminescence
Carbon Monoxide	8 Hour	>9.1 ppm (10 mg/m³)	Non-dispersive Infrared Spectroscopy (NDIR)	≥9.5 ppm (10 mg/m³)	Same as Primary Stds.	Non-dispersive Infrared Spectroscopy (NDIR)
	1 Hour	>20 ppm (23 mg/m³)		>35 ppm (40 mg/m³)		
Nitrogen Dioxide	Annual Average	-	Gas Phase Chemilumi-nescence	>0.0534 ppm (100 ug/m³)	Same as Primary Std.	Gas Phase Chemiluminescence
	1 Hour	>0.25 ppm (470 ug/m³)		-		
Sulfur Dioxide	Annual Average	-	Ultraviolet Fluorescence	0.03 ppm (80 ug/m³)	-	Pararosaniline
	24 Hour	0.05 ppm (131 ug/m³)		0.14 ppm (365 ug/m³)	-	
Suspended Particulate Matter (PM ₁₀)	Annual Geometric Mean	30 ug/m3	Size Selective Inlet High Volume Sampler and Gravimetric Analysis	-	-	-
	24 Hour	>50 ug/m3		>150 ug/m3	Same as Primary Stds.	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	-	-	>50 ug/m3		
Sulfates	24 Hour	≥25 ug/m3	Turbidimetric Barium Sulfate	-	-	-
Lead	30 Day Average	≥1.5 ug/m3	Atomic Absorption	-	-	Atomic Absorption
	Calendar Quarter	-		≥1.5 ug/m3	Same as Primary Std.	
Visibility Reducing Particles	1 Observation	In sufficient amount to reduce the prevailing visibility to less than 10 miles when the relative humidity is less than 70 percent		-	-	-
* Prepared in accordance with applicable SCAQMD Air Quality Data Cards and ARB Fact Sheet 38 (revised 7/88).						

* Prepared in accordance with applicable SCAQMD Air Quality Data Cards and ARB Fact Sheet 38 (revised 7/88).

Table A-2

AIR QUALITY MONITORING SUMMARY
(Number of Days Standards Were Exceeded and
Maximum Levels During Such Violations)¹

Pollutant/Standard	1992	1993	1994	1995	1996
Ozone					
1-Hour \geq 0.09 ppm	45	23	15	19	13
1-Hour $>$ 0.12 ppm	12	7	2	1	1
Max. 1-Hour Conc. (ppm)	0.17	0.18	0.16	0.14	0.14
Carbon Monoxide					
1-Hour $>$ 20 ppm	0	0	0	0	0
8-Hour $>$ 9.1 ppm	0	0	0	0	0
Max 1-Hour Conc. (ppm)	11	9	9	8	7
Max. 8-Hour Conc. (ppm)	5.9	5.4	6.0	5.6	4.5
Nitrogen Dioxide					
1-Hour \geq 0.25 ppm	1	0	0	0	0
Max. 1-Hour Conc. (ppm)	0.30	0.17	0.16	0.20	0.25
Sulfur Dioxide					
24-Hour \geq 0.04 ppm	0	0	0	0	0
Max. 24-Hour Conc. (ppm)	0.010	0.007	0.011	0.011	0.010
Inhalable Particulates (PM₁₀)²					
24-Hour $>$ 50 ug/m ³	22/61	26/61	20/60	14/60	11/60
24-Hour $>$ 150 ug/m ³	0/61	0/61	0/60	0/60	0/60
Max. 24-Hour Conc. (ug/m ³)	137	104	122	141	138
¹ All concentrations are as measured at the West Los Angeles Air Monitoring Station except sulfur dioxide and PM ₁₀ particulates which are for the Los Angeles Station.					
² Violations per number of samples.					

3.0 Environmental Consequences

3.1 Impact Significance Criteria

Section 15002(g) of the state CEQA Guidelines defines a significant effect on the environment as "a substantial adverse change in the physical condition which exists in the area affected by the proposed project." In order to determine whether or not the proposed project would cause a

significant effect on the environment, the impact of the proposed project must be determined by examining the types and levels of emissions generated by the proposed project and its impacts on factors that affect air quality. To accomplish this determination of significance, the SCAQMD has established air pollution thresholds against which a proposed project can be evaluated. The SCAQMD has established thresholds to assist lead agencies in determining whether or not the proposed project is significant. If the thresholds are exceeded by a proposed project, then it should be considered significant.

The SCAQMD recommends that the following two types of air pollution thresholds be used by lead agencies in determining whether the operational phase of a proposed project is significant. However, *the final determination of whether or not a project is significant is within the purview of the lead agency* pursuant to § 15064(b) of the *State CEQA Guidelines* [emphasis added]. If the lead agency finds that the proposed project has the potential to exceed either of the air pollution thresholds, the project should be considered significant. Both of these threshold factors are individually discussed below.

3.1.1 Construction Phase - Thresholds of Significance

Separate threshold standards have been recommended for assessing construction-term impacts, which are averaged over a 3-month period to include only actual working days.

The following significance thresholds for air quality have been established by the SCAQMD on a daily basis for construction emissions:

- (1) 75 pounds per day for ROC;
- (2) 100 pounds per day for NO_x;
- (3) 550 pounds per day for CO;
- (4) 150 pounds per day for PM₁₀; and
- (5) 150 pounds per day of SO_x.

The following significance thresholds for air quality have been established by the SCAQMD on a quarterly basis for construction emissions:

- (1) 2.5 tons per quarter of ROC;
- (2) 2.5 tons per quarter of NO_x;
- (3) 24.75 tons per quarter of CO;
- (4) 6.75 tons per quarter of PM₁₀; and
- (5) 6.75 tons per quarter of SO_x.

During construction, if any of the identified daily or quarterly air pollutant thresholds are exceeded by the proposed project, then the proposed project's air quality impacts should be considered significant.

3.1.2 Operational Phase - Thresholds of Significance (Primary Effects)

Specific criteria air pollutants have been identified by the SCAQMD as pollutants of special regional concern. Based upon this categorization, the following significance thresholds for operational emissions have been established by the SCAQMD for project operations:

- (1) 55 pounds per day of ROC;
- (2) 55 pounds per day of NO_x;
- (3) 550 pounds per day of CO;
- (4) 150 pounds per day of PM₁₀; and
- (5) 150 pounds per day of SO_x.

Projects within the SCAB with daily operation-related emissions that exceed any of the above emission thresholds may be considered significant.

The SCAQMD indicates in Chapter 6 of their *CEQA Air Quality Handbook* (Handbook) that a project is considered to be mitigated to a level of insignificance if its primary effects are mitigated below the thresholds provided above.

3.1.3 Operational Phase - Thresholds of Significance (Secondary Effects)

The SCAQMD recommends that "additional indicators" should be used as screening criteria with respect to air quality. Relevant additional factors identified in the Handbook include the following significance criteria:

- (1) interference with the attainment of the federal or State ambient air quality standards by either violating or contributing to an existing or projected air quality violation;
- (2) generation of vehicle trips that cause a CO "hot spot ";
- (3) creation of (or subject receptors to) an objectionable odor over 10 dilution to thresholds; and
- (4) emission of an air toxic contaminant regulated by SCAQMD rules or included on a federal or State air toxic list.

As with primary effects, a project is mitigated to a level of insignificance if its secondary effects are mitigated below the threshold levels provided above.

3.2 Analysis of Impacts

3.2.1 Construction

Construction is proposed in two phases. The first phase involves the construction and testing of the proposed wells. If the anticipated volume and quality of water is unobtainable, there would be little sense in the construction of the pipelines and public works facility. Furthermore, the actual piping and treatment plant specifications will depend on the volume and quality of the water obtained. As

such, construction would be performed in two phases and the emissions from the construction of the wells would not be expected to be additive of those associated with the construction of the piping and public works facility.

Wells

Construction activities and deliveries produce combustion pollutants both at the site and along haul routes. Additionally, dust will be produced at the construction site due to excavation activities. Well construction is estimated to include three pieces of heavy equipment; a backhoe to dig the vault, a drill rig to drill the hole, and a crane to set the casing and pump in place. A welder is also included to weld casing, vault covers, and any necessary metal work. Obviously, these actions could not be performed simultaneously and in actuality only one or two pieces would be in use at any one time. Emissions for the heavy equipment were obtained from Table A9-8-B of the Handbook. Of the four types of equipment discussed above, the Table A9-8-B shows the drill rig and welder as creating the greatest levels of pollution. For the purposes of this analysis construction is based on an 8-hour per day schedule with both the drill rig and welder in operation. This is probably an overestimation of actual emissions as welding equipment typically does not operate for the duration of the construction day and all equipment is subject to down-time due to failure and worker breaks. Still for the purposes of this analysis, the drill rig and welder are considered to work continuously for an 8-hour period on a daily basis.

A commuting component for construction employee travel and haul trucks has also been included. As many as 10 workers (including foremen, inspectors, etc.) could visit the site on any given day. In accordance with the Handbook, worker commutes are based on a 20.2 mile round-trip. Two truck hauls per day are also included in the analysis, each with a projected round-trip distance of 40 miles. As a reasonable worst-case scenario, all trips are assumed to have cold starts for each direction of travel. Well construction emissions, including heavy equipment and mobile-source emissions are shown in Table A-3. In addition to gaseous emissions, construction also creates fugitive dust. *AP-42 A Compilation of Air Pollutant Emission Factors* (AP-42) (USEPA, 1995) (from which emission factors in the Handbook were derived), denotes that each acre disturbed during the grading portion of heavy construction creates as much as 1.2 tons of total suspended particulates (PM₃₀) per month or 110 pounds per day. The regulated PM₁₀ portion comprises about 45 percent of this value or about 50 pounds per day. Well construction is actually limited to a relatively small area and does not involve grading and in the performance of the contract, to avoid extensive clean-up and revegetation, contractors will typically attempt to disturb as little area as possible. The area to be disturbed is estimated at no more than about 0.1 acre (50 feet by 100 feet). Based on a value of 50 pounds per acre per day, PM₁₀ dust emissions are estimated at no more than 5 pounds per day. Note that construction emissions are sufficiently low such that two wells could be constructed simultaneously without exceedance of either the daily or (if construction were to take as long as 3 months), quarterly significance criteria.

Table A-3

DAILY WELL CONSTRUCTION EMISSIONS

Pollutant	Heavy Equipment ¹ (Lb/day)	Worker Commutes ² (Lb/day)	Heavy Trucks ³ (Lb/day)	Total Emissions (Lb/day)
Carbon Monoxide	26.5	5.7	2.7	34.9
Nitrogen Oxides (NO _x as NO ₂)	32.4	0.4	0.9	33.7
Reactive Organics	4.0	0.4	0.3	4.7
Sulfur Oxides (SO _x as SO ₂)	2.8	Neg ⁴	0.1	2.9
PM ₁₀ Particulate Matter ⁵	7.0	Neg	0.1	7.1
¹ Based upon Tables A9-8-B, A9-8-C, and A9-8-D of the Handbook and considers a well drill rig and welder each operating 8-hours per day. ² Worker commutes are based on 1997 emission factors as included in Table A9-5-J-4 of the Handbook for 10 workers each commuting 20.2 miles at an average speed of 25 mph with two cold starts. ³ Haul trips are based on 1997 emission factors as included in Table A9-5-K-4 of the Handbook for two trucks per day each with a round-trip of 40 miles and two cold starts. ⁴ Neg - Negligible, less than 0.05 pound per day. ⁵ Includes 5 pounds per day for PM ₁₀ due to dust.				

In addition to the daily criteria levels set by the SCAQMD, the project could create a significant impact if it produced CO or NO₂ emissions' "hot spots" in excess of State or federal ambient air quality standards (see Table A-1). However, because the number of pieces of equipment involved in the construction effort is relatively small as are the number of related vehicles (i.e., no more than 10 per well), and the area is open allowing for pollutant dispersion, no criteria pollutant concentrations in excess of State or federal standards will be produced and no significant "hot spots" will be created. Finally, all emissions associated with the project are typical of internal combustion engines. No hazardous pollutants are created in significant quantities and no hazardous pollutant significant impacts will be produced.

Pipelines

Pipelines will be required to convey water from the wells to the treatment facility. At this time, the exact type of equipment to be used to carry out the construction contract is unknown and will vary from contractor to contractor. Furthermore, all details of the construction procedures have not been finalized. However, one can suppose a generic type of equipment to perform on-site activities and

bring in pipe and other necessary building supplies.

Because the pipelines are of a relatively small diameter and are to be placed in existing roadways and alleys, both the number of pieces and sizes of the construction equipment are limited. A pneumatic concrete saw is assumed to cut the asphalt. A trencher would then remove the blacktop and dig the trench. A welder could be used to assemble the pipe sections. A crane would be used to lay the pipe. A backhoe/loader would backfill the trench. A pneumatic compactor powered by a compressor would be used to recompact the excavation and a paver would reseal the asphalt. It is assumed that the process is linear and that all of this equipment could conceivably be used on any given day. Emissions for the heavy equipment were obtained from Table A9-8-B of the Handbook and are included in Table A-4 of this report.

As with well installation, a commuting component for construction employee travel and haul trucks has also been included. As many as 20 workers (including foremen, inspectors, etc.) could be used on any given day. In accordance with the Handbook, worker commutes are again based on a 20.2 mile round-trip. To remove excess soil and deliver materials, four truck hauls per day are also included in the analysis each with a projected round-trip distance of 40 miles. As a reasonable worst-case scenario, all trips are assumed to have cold starts for each direction of travel.

In addition to gaseous emissions, construction also creates fugitive dust. As the pipelines are to be placed in existing streets and alleys, and no grading is to be performed, these emissions would be very limited. Still, as a worst-case scenario, this analysis assumes that at any one time 200 feet of trench are open with a width of 12 feet (probably a gross overestimate). Again using a value of 50 pounds per acre per day, PM_{10} dust emissions are estimated at no more than 3 pounds per day. Note that construction emissions are within both the daily and quarterly criteria levels and pipeline construction is not expected to result in any significant air quality impacts.

Similarly, based on the relatively small construction work force and number of materials' hauls, no criteria pollutants in excess of State or federal standards will be produced and no significant "hot spots" will be created. Finally, all emissions associated with the project are typical of internal combustion engines. No hazardous pollutants are created in significant quantities and no hazardous pollutant significant impacts will be produced.

Public Works Facility

Like the wells and pipelines, construction of the public works facility would require the use of heavy equipment, manpower, and materials' hauls. Like any construction of this type, equipment use is staged. The area is first graded and any subgrade excavation is performed.

When the site is ready, building construction and equipment installation is performed. Here the equipment use is expected to be more varied than with either the well or pipeline installation and equipment use is not so clear-cut. The heaviest, and most polluting equipment, is associated with site preparation where dozers, excavators, loaders, compressors, and pavers are used. During later phases cranes, compressors, and forklifts may be utilized. These latter types of equipment tend to be of lower horsepower and more efficient in the combustion process. Thus, if an air quality impact is to be expected, it would be expected during the initial phases of construction.

Table A-4

DAILY PIPELINE CONSTRUCTION EMISSIONS

Pollutant	Heavy Equipment ¹ (Lb/day)	Worker Commutes ² (Lb/day)	Heavy Trucks ³ (Lb/day)	Total Emissions (Lb/day)
Carbon Monoxide	24.3	11.4	5.4	41.1
Nitrogen Oxides (NO _x as NO ₂)	55.6	0.8	1.8	47.2
Reactive Organics	5.6	0.8	0.6	6.7
Sulfur Oxides (SO _x as SO ₂)	4.1	Neg ⁴	0.2	4.6
PM ₁₀ Particulate Matter ⁵	5.5	Neg	0.2	5.7
¹ Based upon Tables A9-8-B, A9-8-C, and A9-8-D of the Handbook and considers a trencher, a welder, a crane, a backhoe, a compressor, and a paver each operating 8-hours per day. ² Worker commutes are based on 1997 emission factors as included in Table A9-5-J-4 of the Handbook for 20 workers each commuting 20.2 miles at an average speed of 25 mph with two cold starts. ³ Haul trips are based on 1997 emission factors as included in Table A9-5-K-4 of the Handbook for four trucks per day each with a round-trip of 40 miles and two cold starts. ⁴ Neg - Negligible, less than 0.05 pound per day. ⁵ Includes 3 pounds per day for PM ₁₀ due to dust.				

This analysis assumes the simultaneous use of a grader, an excavator, a loader, a roller, a forklift, a compressor, and a paver. Emissions for the heavy equipment were obtained from Table A9-8-B of the Handbook and are included in Table A-5 of this report.

For the commuting component, construction employees are estimated at no more than 40 on any given day. In accordance with the Handbook, worker commutes are based on a 20.2 mile round-trip. To remove any excess soil and deliver materials, eight truck hauls per day are also included in the analysis each with a projected round-trip distance of 40 miles. As a reasonable worst-case scenario, all trips are assumed to have cold starts for each direction of travel.

The public works facility construction would also create fugitive dust. This facility is to occupy approximately one-third of a 3.8 acre parcel or about 1.3 acres. As the site is already paved, it is level and relatively little grading would be required. Still, to present a reasonable worst-case scenario, it is assumed that the entire 1.3 acres undergoes simultaneous grading.

Table A-5

DAILY PUBLIC WORKS FACILITY CONSTRUCTION EMISSIONS

Pollutant	Heavy Equipment ¹ (Lb/day)	Worker Commutes ² (Lb/day)	Heavy Trucks ³ (Lb/day)	Total Emissions (Lb/day)
Carbon Monoxide	24.5	22.8	10.8	58.1
Nitrogen Oxides (NO _x as NO ₂)	55.6	1.6	3.6	60.8
Reactive Organics	5.3	1.6	1.2	8.1
Sulfur Oxides (SO _x as SO ₂)	5.0	Neg ⁴	0.4	5.4
PM ₁₀ Particulate Matter ⁵	35.2	Neg	0.4	35.6
¹ Based upon Tables A9-8-B, A9-8-C, and A9-8-D of the Handbook and considers a grader, an excavator, a loader, a roller, a forklift, a compressor, and a paver each operating 8-hours per day. ² Worker commutes are based on 1997 emission factors as included in Table A9-5-J-4 of the Handbook for 40 workers each commuting 20.2 miles at an average speed of 25 mph with two cold starts. ³ Haul trips are based on 1997 emission factors as included in Table A9-5-K-4 of the Handbook for eight trucks per day each with a round-trip of 40 miles and two cold starts. ⁴ Neg - Negligible, less than 0.05 pound per day. ⁵ Includes 32.5 pounds per day for PM ₁₀ due to dust.				

Again using a value of 50 pounds per acre per day for site preparation, the 1.3 acres would produce 65 pounds per day of PM₁₀ associated with fugitive dust. While site watering was not really feasible (nor warranted) for either well or pipeline construction, it is feasible and in all probability required by SCAQMD Rule 403 for the grading phase of public works facility construction. Twice daily site watering is estimated to reduce dust (and its associated PM₁₀) emissions by 50 percent and the resultant value (i.e., 32.5 pounds per day) would be additive with the PM₁₀ created as an exhaust by-product. However, even if site watering were not performed, PM₁₀ emissions would not exceed either their daily or quarterly significance criteria.

Note that construction emissions are within both the daily and quarterly criteria levels and public works facility construction is not expected to result in any significant air quality impacts. However, if public works facility construction is performed simultaneously with pipeline construction, NO_x emissions could exceed both daily and quarterly criteria levels resulting in a significant air quality impact.

As with well and pipeline construction, no criteria pollutant concentrations in excess of State or federal standards will be produced and no significant "hot spots" will be created. Finally, no hazardous pollutants are created in significant quantities and no hazardous pollutant significant impacts will be produced.

3.2.2 Operations

Stationary Source Emissions

While construction of the wells, pipeline, and public works facility may occur separately, once operational, all will work in unison and their emissions will be additive. With the exception of occasional testing of the emergency generator, no on-site exhaust emissions are produced from project operations and all exhaust emissions are produced off-site during the production of project-related electricity necessary to run both the well pumps and the public works facility. No motors or emissions are associated with pipeline operation.

To determine the emissions due to the generation of electricity, it is first necessary to calculate the total electrical use associated with the project. Each well is to be equipped with a 50 horsepower electric motor to pump the water from the ground to the treatment plant. Motor efficiency is estimated at 65 percent. The electrical use for each motor is converted into kilowatt-hours as follows:

$$\text{kilowatts} = \frac{746 \text{ watts/Hp}}{0.65} \times \frac{1 \text{ kW}}{1,000 \text{ watts}} \times 50 \text{ Hp}$$

$$= 57.4 \text{ kilowatts per pump}$$

$$57.4 \text{ kilowatts} \times 4 \text{ pumps} \times 24 \text{ hours per day}$$

$$= 5,508.9 \text{ kilowatt-hours per day.}$$

The treatment plant will use two 75 horsepower feed pumps, as well as three transfer pumps and 12 chemical feed pumps. Electricity is also associated with lighting and electronic componentry. No horsepower ratings or electrical use is presented for these other pumps, lighting, or componentry and electrical use was derived from the economic analysis prepared for the project.

Using the same efficiency factors and equations as were used for the well pumps, the two 75 horsepower pumps will consume 4,131.7 kilowatt-hours per day. The economic analysis shows that the two feed pumps require \$0.091 worth of electricity for each 1,000 gallons processed. The remainder of treatment plant's electrical uses require \$0.018 worth of electricity per 1,000 gallons. Therefore, the feed pumps consume 0.091/0.018 or 5.06 times the electricity as the remainder of the facility. Using the estimated value of 4,131.7 kilowatt-hours for the feed pumps, the remainder of the system requires approximately 817.3 kilowatt-hours per day. Assuming a continuous 24-hour operation, the total daily electrical consumption, including four wells, two feed pumps, and all other assorted pumps, lighting, and components is then estimated at 10,457.9 kilowatt-hours. Emissions associated with the production of this electricity were calculated in accordance with Table A9-11-B

of the Handbook and are include in Table A-6 of this report.

Table A-6

DAILY OPERATIONAL EMISSIONS

Pollutant	Electrical Generation¹ (Lb/day)	Natural Gas Combustion² (Lb/day)	Mobile Sources³ (Lb/day)	Total Emissions (Lb/day)
Carbon Monoxide	2.1	Neg ⁴	7.0	9.1
Nitrogen Oxides (NO _x as NO ₂)	12.0	0.1	0.8	12.9
Reactive Organics	0.1	Neg	0.5	2.6 ⁵
Sulfur Oxides (SO _x as SO ₂)	1.3	Neg	Neg	1.3
PM ₁₀ Particulate Matter	0.4	Neg	Neg	0.4
¹ Based upon the use of 10,457.9 kilowatt-hours per day and emission factors included in Table A9-11-B of the Handbook. ² Based upon the use of 455 cubic feet of natural gas per day and emission factors included in Table A9-12-B of the Handbook. ³ Worker commutes are based on 1997 emission factors as included in Table A9-5-J-4 of the Handbook for 10 workers each commuting 20.2 miles at an average speed of 25 mph with two cold starts. Haul trips are based on 1997 emission factors as included in Table A9-5-K-4 of the Handbook for one truck per day each with a round-trip of 40 miles, one cold start and one hot start. ⁴ Neg - Negligible, less than 0.05 pound per day. ⁵ Includes an estimated 2 pounds per day for water treatment and disinfection.				

In addition to the use of electricity, natural gas may be used for both space and water heating. If natural gas is to be used, it would be used in the lobby/employee facilities. This area is approximately 7,000 square feet. Table A9-12-A of the Handbook presents natural gas consumption rates for various types of land uses. Office space is estimated at 2.0 cubic feet of gas per square foot of floor space per month. The 7,000 square feet would then require 14,000 cubic feet of gas per month or about 455 cubic feet per day. Emissions associated with the combustion of this gas were calculated in accordance with Table A9-12-B of the Handbook. All values are less than 0.1 pound per day and are negligible.

Mobile Source Emissions

The wells and pipelines require no regular monitoring and no regular vehicle trips are associated with their use. The treatment plant is highly automated and its staff is not expected to exceed 10

employees per day. Additionally, trucks will be required to make regular deliveries of chemicals used in the treatment process and remove sludge. While truck trips are actually only anticipated at one or two per week, as a worst-case scenario, one truck is assumed on a daily basis. These emissions are also included in Table A-6. Note that in accordance with the table, criteria pollutants associated with project operations are well below the significance criteria values and no significant impacts are projected.

VOC Emissions

Past discussion with Rod Millican, Senior Air Quality Engineer at the SCAQMD (August 6, 1996) revealed that their experience with wastewater treatment facilities shows that fugitive VOC emissions are on the order of 0.1 ton per million gallons per day treated per year. That is, if one million gallons were treated on a daily basis, 0.1 ton or 200 pounds of VOCs would be produced per year or 0.55 pound would be produced per day. Based on the treatment of 3.5 million gallons of wastewater per day, VOC emissions would be estimated at about 1.9 pounds per day. The pumping and disinfection of groundwater would be expected to create an even lesser quantity of VOC emissions.

If possible, well water will be obtained in a region of the aquifer that is not contaminated. Well testing will confirm the absence (or presence) of any chemicals which may produce airborne toxins. If the testing of well water shows the need for further treatment beyond that proposed, the water could be subject to the use granular activated carbon adsorption and/or air stripping. Air emissions produced from an air stripper may require subsequent treatment to remove any hazardous compounds. These operations are regulated and permitted through the SCAQMD and SCAQMD will require at least a screening level health risk assessment prior to issuing a Permit to Operate. These measures will reduce any potential health risk impacts to a level that is less than significant.

Odors

Odors are one of the most obvious forms of air pollution to the general public. Odors can present significant problems for both the source and the surrounding community. Although offensive odors seldom cause physical harm, they can cause agitation, anger, and concern to the general public. Most people determine an odor to be offensive (objectionable) if it is sensed longer than the duration of a human breath; typically 2 to 5 seconds.

The general public is usually concerned with offensive odors because they associate them with the possibility of also causing adverse health effects; that is, the odor could contain some amount of a toxic substance. However, because something smells bad does not mean that it is toxic. For instance, hydrogen sulfide (H_2S) gas smells like a rotten egg, but its odor would not be toxic at the low concentrations that would be found within the ambient air.

The treatment facility may be required to remove hydrogen sulfide (H_2S) from the water passing through. H_2S is oxidized to sulfur through the addition of caustic soda to increase the alkalinity. H_2S is characterized by its "rotten egg" smell. While odor threshold varies with an individual's sensitivity, these odors are typically notable in the range of 0.003 to 0.02 parts per million. Odor

impact (i.e., nuisance) is subjective and typically only quantifiable through qualitative means such as odor panels (i.e., a group of individuals who "whiff" odors at various concentrations).

Odor strength is generally characterized by the number of dilutions with unodorized air required until less than one half of all people can detect a given odor. The number of "odor units" or "dilution-to-threshold" (D/T) is a measure of odor's intensity, but does not incorporate any possible sense of unpleasantness.

The Handbook notes that at 5 D/T, an unpleasant odor is clearly noticeable to most people of normal sensitivity. At 10 D/T, an unpleasant odor may evoke a rise in public complaint and this level is recommended as an odor significance threshold. For H_2S as the primary source of odors, 1 D/T is approximately 0.003 ppm. Based on a 10 D/T ratio, an impact would be significant at 0.03 ppm. This threshold is equal to the State's odor based public health threshold for a one-hour average of 0.03 ppm.

At this time it cannot be determined as to whether the received water will contain H_2S in sufficient quantities to create odors that are of a significant level or even detectable at off-site receptor locations. Further testing of the wells once installed will allow a more thorough evaluation of the potential for odor impacts. However, the proposed measures will ensure that any potential impacts remain at less than significant levels.

4.0 Mitigation Measures

4.1 Construction

As long as well construction is limited to no more than two wells at any given time, no construction impacts are projected and no mitigation is warranted. Similarly, if pipeline installation and public works facility construction site preparation activities are not performed concurrently, no construction impacts are anticipated from this construction and no mitigation is necessary.

4.2 Operations

All criteria pollutants are generated at such low rates that the SCAQMD daily significance criteria levels will not be exceeded and no mitigation is warranted.

Any potential for odor impacts will be determined during well testing. If testing determines that there is a potential for H_2S impacts during the treatment process, measures shall be incorporated into the treatment facility's design to reduce these odors to insignificant levels. This may be accomplished through an air stripping system with activated carbon-treatment (or other media) systems to remove any H_2S gas. Furthermore, the Applicant shall comply with all applicable Rules and Regulations as imposed by the SCAQMD and conduct regular air monitoring if directed by the SCAQMD. These measures will ensure that any potential impacts remain below a level of significance.

REFERENCES

Chambers Group, Inc., Final Noise Survey for the Construction and Operation of the International Wastewater Treatment Plant and Outfall Facilities at the Tijuana River San Diego, California, February 1992

Federal Clean Air Act, 1977

Lewis-Presley Air Quality Act, 1987

South Coast Air Quality Monitoring District, 1992 - 1996, Air Pollution Data Monitoring Cards (1993, 1994, 1995, 1996, and 1997)

South Coast Air Quality Monitoring District, 1993, Rules and Regulations, January 1993

South Coast Air Quality Monitoring District, 1993, SCAQMD CEQA Air Quality Handbook, April 1993

South Coast Air Quality Monitoring District, 1980, A Climatological/Air Quality Profile, California South Coast Air Basin, Prepared by Ralph W. Keith

USEPA 1985, AP-42, Compilation of Air Pollutant Emission Factors, Fifth Edition, January 1995

APPENDIX B

Noise Analysis

NOISE ANALYSIS
PREPARED FOR THE CONSTRUCTION AND OPERATION
OF THE CITY OF BEVERLY HILLS
MUNICIPAL WATER AND PUBLIC WORKS PROJECT

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JANUARY, 1998

1.0 OVERVIEW

The following presents the results of a noise analysis performed in support of the Initial Study prepared for the construction water wells, associated pipelines, and a treatment facility to be located within the City of Beverly Hills. The project includes the construction and operation of four wells used to supply municipal water for local use. Obtained water would be treated through reverse osmosis. Currently, the treatment facility is projected to process as many as 3.5 million gallons of water per day but shall be designed with a capacity of 5.0 million gallons per day. When complete, the facility would supply approximately 20 percent of the City's water demands. At this time it is estimated that approximately 87 percent of the water (based on previous studies) could be brought up to drinking water standards and this portion of the water would be blended with water from the Metropolitan Water District at its connection near Sunset Boulevard and Rexford Drive. The remaining approximately 13 percent would contain most of the dissolved minerals and would be discharged into the storm drain system.

The included study is prepared to the level of detail necessary for CEQA review to determine if the project would create any significant noise impacts. The noise study includes a discussion of applicable rules and regulations, a description of the existing setting, a discussion of threshold criteria levels, and an impacts analysis for both the construction and subsequent operational phases of the project.

The study concludes while construction has the potential produce significant noise impacts, implementation of the recommended mitigation measures will reduce these to a level that is less than significant. No significant impacts are associated with project operation and no further mitigation is warranted.

2.0 Environmental Setting

2.1 Characteristics of Sound and City Policy

Sound is mechanical energy transmitted by pressure waves in a compressible medium such as air. Noise can be defined as unwanted sound. Sound is characterized by various parameters that include the rate of oscillation of sound waves (frequency), the speed of propagation and the pressure level or energy content (amplitude). In particular, the sound pressure level has become the most common descriptor used to characterize the loudness of an ambient sound level. The decibel (dB) scale is used to quantify sound intensity. Because sound pressure can vary by over one trillion times within the range of human hearing, a logarithmic loudness scale is used to keep sound intensity numbers at a convenient and manageable level. Since the human ear is not equally sensitive to all frequencies within the entire spectrum, noise measurements are weighted more heavily within those frequencies of maximum human sensitivity in a process called "A-weighting" written as dBA.

Time variation in noise exposure is typically expressed in terms of a steady-state energy level equal to the energy content of the time varying period (called L_{eq}), or alternatively, as a statistical description of the sound level that is exceeded over some fraction of a given observation period. The L_{min} and L_{max} represent the 1-second minimum and maximum values. Because community receptors are more sensitive to unwanted noise intrusion during the evening and at night, state law requires that, for planning purposes, an artificial dB increment be added to quiet time noise levels in a 24-hour noise descriptor called the Community Noise Equivalent Level (CNEL) or the day/night average noise level (L_{dn}).

In many communities where a quiet environment is considered an important asset that enhances the natural setting, a somewhat more stringent land use compatibility guideline (as compared to other urban areas) has been adopted. Applicable noise criteria are presented in the City of Beverly Hills Noise Element (1975) and methods to enforcement these criteria are presented in City of Beverly Hill Noise Ordinance (1988). As stated in the Noise Element "Actual standards have not been developed regarding noise in Beverly Hills. However, the City Ordinances on noise imply policies and standards: That the ambient noise levels within Beverly Hills should not be increased by additional specific noise sources."

Policies within the Noise Ordinance which specifically relate to the project include Sec. 5-1.202, "Machinery, equipment, fans, and air-conditioning" which restricts noise from exceeding an increase of 5 dbA at any property line, and Sec. 5-1.2, "Restrictions on construction activity" which restricts construction to between the hours of 8:00 a.m. and 6:00 p.m. and disallows construction on Sundays, legal holidays, and Saturdays within 500 feet of residential areas.

2.2 Local Noise Levels

Existing noise levels near the proposed wells, pipelines, and public works facility are those typical of urban development. Noise sources derive almost exclusively from vehicular traffic. However, at the time of the first field study (i.e., May 22, 1997) Burton Way (along which two wells are to be placed) was undergoing reconstruction and heavy equipment noise added to the ambient noise profile. Additionally, at the City equipment yard (the site of the proposed public works facility) the barking of dogs from the adjoining small animal hospital was evident.

To determine ambient noise at the various well sites, at the public works facility site, and at proximate receptor locations, field studies were performed on May 22, 1997 and January 21, 1998. Six noise level measurements were obtained during the first study and an additional five were obtained during the second. During both studies, noise monitoring was conducted using a Quest Technologies Model 2900 Type 2 Integrating/logging Sound Level Meter. The unit meets the American National Standards Institute Standard S1.4-1983 for Type 2, International Electrotechnical Commission Standard 651 - 1979 for Type 2, and International Electrotechnical Commission Standard 651 - 1979 for Type 2 sound level meters. The unit was field calibrated at 9:55 a.m. on May 22 and 10:25 a.m. on January 21. In both cases calibration was performed using a Quest Technologies QC-10 calibrator immediately prior to the first set of readings. The accuracy of the calibrator is maintained through a program established through the manufacturer and is traceable to the National Bureau of Standards. The unit meets the requirements of the

American National Standards Institute Standard S1.4-1984 and the International Electrotechnical Commission Standard 942: 1988 for Class 1 equipment.

The results of each day's monitoring are presented below. Readings NR-1 through NR-6 were obtained on May 22 while NR-7 through NR-11 were obtained on January 21. All readings are discussed below. Results of each survey are included in Table B-1.

NR-1 - Proposed Well Site Along Burton Way West of Foothill Road

This measurement was obtained at the site of a proposed well in the parkway between the eastbound and westbound lanes of Burton Way at the site of the existing test well. The actual monitored location was 56 feet north of the innermost eastbound lane, 48 feet south of the innermost westbound lane, and 179 feet west of the southbound lane of Foothill Road. Single family residential structures are located along the south side of the eastbound lane while multifamily units are located along the north side of the westbound lane of Burton Way.

The dominant noise source during the survey was that of passing vehicles on Burton Way; however, construction to the east across Foothill Road was also audible in the background. Furthermore, City workers were unloading pipe at a distance of about 60 feet during the first 2 minutes of the reading.

NR-2 - Proposed Well Site Along Burton Way West of North Oakhurst Drive

This measurement was obtained at the site of a proposed well also in the parkway between the eastbound and westbound lanes of Burton Way. The actual monitored location was 28 feet north of the innermost eastbound lane, 30 feet south of the innermost westbound lane, and 40 feet west of Oakhurst (which was closed due to the construction). Again, single family residential structures are located along the south side of the eastbound lane while multifamily units are located along the north side of the westbound lane of Burton Way.

While the dominant noise source for this location would typically be from passing vehicles on Burton Way; local construction elevated noise levels well above typical traffic levels. An excavator was trenching the innermost westbound lane of Burton at a distance of 74 feet from the monitored location. This excavator was working its way west and at the end of the monitored period was at a distance of about 105 feet. Additionally, a generator was being used for welding at a distance of about 45 feet to the south of the meter. This welding was intermittent and lasted for about 2 minutes of the reading period. In actuality, the presence of this equipment provides a reasonable indication of construction noise discussed later in this document.

Table B-1

FIELD SURVEY NOISE MEASUREMENTS

Site	Measurement Period	L _{eq} (dBA)	L _{min} (dBA)	L _{max} (dBA)
NR-1	10:00 - 10:15 a.m.	62.8	54.0	73.9
NR-2	10:34 - 10:49 a.m.	73.3	58.9	86.1
NR-3	11:01 - 11:16 a.m.	54.2	47.1	72.4
NR-4	11:30 - 11:45 a.m.	66.8	54.2	78.6
NR-5	11:50 a.m. - 12:05 p.m.	63.2	58.8	70.1
NR-6	12:15 - 12:30 p.m.	69.1	56.0	78.6
NR-7	10:30 - 10:45 a.m.	68.9	53.9	81.6
NR-8	10:52 - 11:07 a.m.	67.8	54.9	75.8
NR-9	11:17 - 11:32 a.m.	62.0	55.2	75.1
NR-10	11:45 - 12:00 noon	47.7	44.0	59.7
NR-11	12:09 - 12:24 p.m.	55.3	37.6	71.0

NR-3 - Proposed Public Works Facility Site (City Equipment Yard)

This measurement was obtained at the site of a proposed public works facility within the City Maintenance Yard. The actual monitored location was in the vehicle parking area 113 feet west of Foothill Road, 32 feet south of the northern fence line, and approximately 230 feet east of the western fence line. The adjoining area includes commercial land uses and no residential used are located in proximity. An animal hospital borders the site to the north and the sound of barking dogs was evident during the reading. Other noise sources included vehicles passing on Foothill Road, birds, airplane overflights, and a "hum" associated with the use of high voltage to the west. Minor noise associated with construction to the west was also notable. Additionally, during the reading a pick-up truck drove by the meter and a street sweeper pulled to within about 70 feet of the meter.

NR-4 - Parkway Near Proposed Well Site at Beverly Boulevard, Santa Monica Boulevard, and Civic Center Drive

At the time of the May 22 field study, a well was proposed to be positioned in the parkway located near the confluence of the westbound lane of Beverly Boulevard, the northeast bound lane of Santa Monica Boulevard, and the southwest bound lane of Civic Center

Drive. The actual monitored location was 133 feet northeast of Beverly Boulevard, 41 feet southeast of Santa Monica Boulevard, and 41 feet northwest of Civic Center Drive. A multifamily unit located 425 Maple Drive is located approximately 135 feet to the southeast and represents the most proximate receptor. Single family units are located across Santa Monica Boulevard with the most proximate being approximately 200 - 250 feet to the west at the corner of Palm Drive and Santa Monica Boulevard and approximately this same distance at the corner of Hillcrest Road and Santa Monica Boulevard. Immediately across Santa Monica Boulevard is the Beverly Gardens Park. Local noise was dominated by traffic along both Santa Monica and Beverly Boulevards.

NR-5 - West End of Multifamily Residential Unit at 425 Maple

During the measurement at NR-4 it was noted that the noise at the adjacent multifamily unit was further removed from local traffic noise and merited its own measurement. The meter was located along the northwest portion of the structure at a distance of approximately 120 feet east of Beverly Boulevard. Note that the west end of the unit is protected by a block wall and the meter was situated immediately east of the wall near the nearest visible dwelling unit. While traffic noise still dominated, a local ventilation system was also notable.

NR-6 - Proposed Well Site Along Santa Monica Boulevard Southwest of Doheny Drive

This measurement was obtained at the site of a proposed well in the parkway between the northeast and southwest bound lanes of Santa Monica Boulevard southwest of Doheny Drive. The actual location was 25 feet north of the eastbound lane and 24 feet south of the westbound lane of Santa Monica Boulevard and 98 feet west of Doheny Road. The Beverly Terrace Hotel is located on the southwest corner and multifamily units are located to its west. The northeastern-most portion of the Beverly Gardens Park is located immediately to the north across Santa Monica Boulevard. Single family dwellings are also located across Santa Monica Boulevard with the nearest being approximately 200 - 250 feet. As would be expected, traffic-generated noise dominated the measurement.

NR-7 - Civic Center Drive East of Beverly Boulevard

This reading was obtained at the revised location of the well referenced in NR-4, above. The noise measurement was obtained along the centerline of Civic Center Drive 45 feet east of the Beverly Boulevard right-of-way. The multifamily unit located 425 Maple Drive, as noted above, is located approximately 100 feet to east and represents the most proximate receptor. Single family units are located across Santa Monica Boulevard with the most proximate being approximately 250 - 300 feet to the west at the corner of Palm Drive and Santa Monica Boulevard and approximately this same distance to the northeast at the corner of Hillcrest Road and Santa Monica Boulevard. While one jet aircraft overflight was noted, most noise was due to local traffic.

NR-8 - Beverly Gardens Park Northeast of Palm Drive and Northwest of Santa Monica Boulevard

This reading was obtained almost due north of NR-7 in the Beverly Garden Park. This site represents the alternative well site to that noted in NR-7, above. The noise measurement was obtained 171 feet northeast of Palm Drive, 211 feet southwest of Hillcrest Road, 43 feet northwest of Santa Monica Boulevard, and 58 feet southeast of a 6.5 foot high block wall that separates the park from the adjacent area. The most proximate residents include the single family units across both Palm Drive and Hillcrest Road, and the multifamily units located to the south of Civic Center noted in NR-4 and NR-7 above. All noise was due to local traffic.

NR-9 - Beverly Gardens Park West of Doheny Drive and Northwest of Santa Monica Boulevard

This reading was obtained in the northeastern-most portion of Beverly Garden Park. The noise measurement was obtained 55 feet northeast of Oakhurst Drive, 211 feet west of Doheny Drive, 140 feet northwest of Santa Monica Boulevard, and 75 feet south of a Carmelita Avenue. The most proximate residents include the single family units across both Oakhurst and Carmelita. While two helicopter and one light plane overflights were noted, most noise was due to local traffic.

NR-10 - Alley Between Alpine Drive and Rexford Drive

This reading was obtained along the pipeline route in the alley between Alpine Drive and Rexford Drive approximately 444 feet southeast of Sunset Boulevard. Single family residential units are located along either side of the alley and while some of these units are set back from the alley, others are located adjacent to the alley. Four light aircraft and one jet aircraft overflight were noted during the noise reading. Additionally, traffic traveling along Sunset Boulevard was perceptible in the background.

NR-11 - Maple Drive Southeast of Elevado Avenue

The monitored location was located on the sidewalk in front of the residence located at 613 Maple Drive along the proposed pipeline route. The selected location is approximately midway between Elevado Avenue and Carmelita Avenue. Local noise was typical of a residential setting. During the first approximately 5 minutes of the reading, a refuse collection truck was noted in the background. Also, 14 automobiles were noted to proceed along Maple. One jet aircraft, one helicopter, and four light aircraft overflights were also noted. Additionally, a dog barking at a proximate home was recorded. Finally, the resident of the house at 613 was noted to come out, start his car located in the driveway

(approximately 20 feet from the meter), and drive away.

Other Areas Along the Pipeline Routes

Obviously it would not be possible to obtain noise level measurements along the entirety of the proposed pipeline route. These levels are then inferred from the data included in the City's General Plan Noise Element. Noise along the routes to be situated within the right-of-way along both Burton and Santa Monica would be projected to be similar to the measurements obtained along these routes. Sunset Boulevard (along the alternative pipeline route) is estimated to be similar to that of Santa Monica. Areas with less traffic, such as along Foothill are presented in the Noise Element as being between 65 and 69 dBA during the day decreasing to below 60 dBA during the night. Less traveled areas, such as Lomitas Avenue and within the alley between Alpine Drive and Rexford Drive are less influenced by traffic and these areas are estimated at less than 60 dBA throughout the day.

3.0 Impacts

3.1 Impact Significance Criteria

Based on the City of Beverly Hills' adopted noise criteria in the General Plan, impacts were considered to be significant operational noise adds 5 dBA at the property line as per Sec. 5-1.202, "Machinery, equipment, fans, and air-conditioning." Construction noise would be significant if construction were not performed in accordance Sec. 5-1.2, "Restrictions on construction activity."

3.2 Analysis of Impacts

3.2.1 Construction

Construction noise represents a short-term impact on ambient noise levels, as noise levels produced by construction activities can reach relatively high levels.

Noise generated from well and pipeline construction was extrapolated from on-site pipeline construction monitoring performed by Chambers Group during the installation of the South Bay Land Outfall pipe in the Tijuana River Valley as well as that obtained during the measurement NR-2 discussed above. The Chambers Group survey involved the installation of a 12 foot diameter pipeline using 18 pieces of heavy construction equipment of which 12 to 13 were operating at any one time. Installation of this pipeline created a noise level of 74.1 to 74.7 dBA at a distance of 90 feet from the largest pieces of machinery. This extrapolates to a value of approximately 79.8 dBA at 50 feet. The proposed City of Beverly Hills project's pipeline is to be 16 inches in diameter and would require only about 1/3 of the equipment necessary for the South Bay Land Outfall. Projected noise from this assemblage of equipment would be approximately 75 dBA as

measured at a distance of 50 feet. The noise measurement during the Beverly Hills noise survey at site NR-2 was located approximately 75 feet from a working excavator, 45 feet from a generator, and proximate to passing traffic. Here an L_{eq} value of 73.3 dBA was recorded. If this 73.3 dBA value were generated solely by the excavator, the projected noise at 50 feet from this piece of equipment would be approximately 76.8 dBA. However, passing traffic as well as the operation of the generator contributed greatly to the monitored noise and a value of 76 dBA L_{eq} represents a reasonable worst-case assumption for pipeline and well construction. This value is then used to determine project-generated noise levels at proximate receptor locations. Table B-2 presents the projected noise associated with construction at varying distances from the construction effort.

Table B-2

NOISE AT VARYING DISTANCES FROM THE CONSTRUCTION EFFORT

Sound Level	Distance from Construction Activities
81 dBA	25 feet
75 dBA	50 feet
70 dBA	100 feet
65 dBA	158 feet
63 dBA	200 feet
60 dBA	281 feet
55 dBA	500 feet

Well Installation

Well installation is most proximate to sensitive land uses along Burton Way, at Civic Center Drive, and within the Beverly Garden Park where drilling equipment could be located at a distance of about 100 feet to proximate residents and the projected noise level from construction equipment could be on the order of 70 dBA. In all cases, this value would be additive with traffic noise and the resultant noise level could be between 71 and 72 dBA. While the noise from construction would be notable, it is well below any level deemed as hazardous to hearing acuity. (Note that the Occupational Safety and Health Administration [OSHA] allows for an 8-hour exposure level of 90 dBA).

Thus, while the impact is adverse, when construction is performed within the guidelines set forth in Sec 5.1-2 of the local Noise Ordinance, it is not significant.

Pipeline Installation

Pipelines would be located more proximate to local residents than wells because they would be placed in existing easements (i.e., streets and alleys) and do not have the extra the buffer zone provided by the parkways and extended distance associated with well placement.

Pipelines placed along Burton Way could come to within about 50 feet of local residents and the noise projected at these residential locations would be on the order of 76 dBA L_{eq} . Local traffic could raise this value by about 1 dBA and a resultant value of 77 dBA L_{eq} could result. Again, while the noise from construction would be notable, it is well below any level deemed as hazardous to hearing acuity and when performed within the guidelines set forth in Sec 5.1-2 of the local Noise Ordinance, constitutes an adverse, but not significant, impact.

Pipeline routes along Santa Monica Boulevard, as well as the alternative route along Sunset Boulevard, are situated further from residential receptors and the resultant noise from this construction would be on the order of 70 dBA. Because traffic along these routes is greater, the construction effort would add a lesser volume to the total noise profile, and again would produce an adverse, but not significant impact.

Construction of pipelines to the north of Santa Monica Boulevard along Maple and Lomas and specifically within the alley would take equipment more proximate to receptor locations. While local streets are approximately 48 feet wide, the alley between Alpine, and Rexford is approximately 25 feet wide. In some cases "zero lot lines" (i.e., the dwelling abuts the alley) were noted in the field survey. While most of these lots have walls or fencing, some of the residents have second story rooms immediately overlooking the alley. In these cases construction equipment could be located as little as 10 feet from the dwelling and the projected noise level at the dwelling could be as much as 90 dBA. Structural attenuation provided by the dwelling, with windows closed, is in excess of 20 dBA and a resultant interior noise level of as much as 70 dBA could result. Again, while this level is certainly adverse, the exposure is below any safety-related concerns, is only of a temporary duration, and by City standards, is not significant.

Public Works Facility Installation

The installation of the public works facility is projected to use a larger assemblage of equipment than either the wells or pipeline, and noise levels would be expected to be greater. Here, a value of 80 dBA as measured at a distance of 50 feet is deemed as a reasonable projection for construction noise. (Note that this level is higher than that monitored in the Tijuana River Noise Study which monitored 12 - 13 pieces of equipment working simultaneously.) The 65 dBA noise level (typically accepted as a desirable exterior noise level), would occur at a distance of approximately 280 feet. The public works facility is not located near any sensitive land uses and when construction is conducted in accordance with City policy, will not present a significant impact.

3.2.2 Operations

Noise impacts for project operations are subject to Sec. 5-1.202 of the Noise Ordinance as noted above. To determine if an impact is probable, it is necessary to ascertain the noise from similar equipment. On June 3, 1997 a noise survey was conducted at the City of Arcadia groundwater extraction well and pumping facility located at 141 East Camino Real within the City of Arcadia. Noise monitoring was performed using the same equipment as described above. The meter was field calibrated immediately prior to the measurement.

The facility is located within an area of single family residential units. The facility includes a well that uses a 75 horsepower motor for water extraction. The pump head is exposed and not contained in a subterranean vault. (Note that the proposed City of Beverly Hills project utilizes 50 horsepower well pumps and the entire assembly is located within an underground vault). Other appurtenant equipment includes a block wall pump house that uses two large pumps in excess of 100 horsepower each. One side of the pump house is louvered for air circulation and all noise emanated from this area. A large water storage tank is also located on-site. The entire site is surrounded by a 6 foot block wall.

Because the well pump was not discernable above the noise produced by the pumps in the pump house, the meter was located at a distance of 10 feet from the well. At this distance the well pump was barely discernable over that from the pump house located at a distance of 75 feet. Other notable noise during the survey was that from a leaf blower being used across Camino Real.

A 5 minute reading was obtained from 10:00 to 10:05 a.m. The measured L_{eq} was 51.5 dBA with L_{min} and L_{max} values of 49.2 and 55.4 dBA, respectively. Again, note that even at a distance of 10 feet, noise from the well pump was not readily discernable over that from the pump house and leaf blower. The human ear can typically discern the noise from two separate events to a difference of about 20 dBA. Thus, the noise from the pump, if it were measured by itself, could be on the order of 40 dBA at a distance of 10 feet. The proposed project's pumps would be entirely underground and their resultant noise would be expected to be even less than this value.

Wells

The noise from the proposed wells is projected at less than 40 dBA at a distance of 10 feet. Noise from the pumps will not be discernable beyond the parkways in which they are placed and will not add 5 dBA to the ambient noise at the property line. Thus, no noise impacts, either adverse or significant, are projected from their operation.

Pipelines

No mechanical equipment is directly associated with pipeline operation. Furthermore, the pipelines are entirely underground and produce no noise. Therefore, no noise impacts, either adverse or significant, are projected from their operation.

Public Works Facility

In the treatment of water, chemical injection, and reverse osmosis procedures do not contribute measurably to plant noise and the noise from the operation of the treatment plant is primarily associated with the operation of its pumps. The facility is to be enclosed and the resultant exterior noise is not expected to exceed that measured at the City of Arcadia pumping station (i.e., 51.5 dBA at a distance of 75 feet). This level is less than that measured in the field survey at the plant site (i.e., 54.2 dBA) and the resultant noise is calculated at 56.1 dBA. Therefore, the treatment plant will not add 5 dBA to the ambient noise and does not present a significant impact. However, the treatment plant will operate 24 hours per day. During the night ambient noise could decrease by as much as 10 dBA over those levels measured in the field and a resultant noise level of about 45 dBA would be expected. At a distance of about 150 feet to the street, the noise from the plant would attenuate by 6 dBA and the resultant level would be approximately 45.5 dBA. When added to the projected ambient noise level of 45 dBA, the resultant noise level is calculated at about 48.3 dBA for an increase of about 3.3 dBA. This value is less than the 5 dBA criterion and does not present a significant impact. Any impact would then be to the small animal hospital located immediately to the north. This facility is not operated during the night and with no sensitive receptors, the impact would not be considered as significant.

4.0 Mitigation Measures

Based upon the provided significance criteria, no significant impacts are projected and no mitigation is warranted. However, pipeline and possibly well construction could create nuisance impacts to local residents and should be reduced to the extent reasonably feasible. Applicable measures include:

- All construction shall be performed in accordance with Sec. 5-1.202 of the City of Beverly Hills Noise Ordinance.
- The contractors shall strive to use the quietest equipment available. All internal combustion powered equipment shall be equipped with properly operating mufflers and kept in a proper state of tune to alleviate back-fires. With the exception of the alternative pipeline route to be placed along Sunset Boulevard, equipment installing pipelines north of Santa Monica Boulevard engines shall be fitted with protective shrouds to reduce motor noise.
- Portable equipment shall be located as far as possible from the adjacent residents.
- Equipment shall be stored and maintained as far as possible from the adjacent residents.
- With the exception of the alternative pipeline route to be placed along Sunset Boulevard, noise curtains shall be used for all pipeline construction north of Santa Monica Boulevard.
- A public awareness program will be instituted before construction to alert the public of the up-coming disturbance.

- A disturbance coordinator responsible for responding to noise complaints shall be designated. This person's name and telephone number should be clearly posted along pipeline routes. It would be this person's responsibility to respond to complaints about noise, determine the cause, and implement measures to mitigate the impact if feasible. Examples include enforcing the allowable hours of construction, identifying poorly muffled equipment and requiring its repair or replacement, and recommending any modifications or additions to the temporary construction noise barrier.

While construction performed in accordance with Sec. 5-1.202 of the City of Beverly Hills Noise Ordinance is not significant, implementation of these, or equally effective measures, would further reduce the construction impact noise to the extent reasonably feasible. Still, the noise from the construction of pipelines north of Santa Monica Boulevard (excepting that along Sunset Boulevard), and specifically within the local alley, remains an adverse, but not significant impact associated with the project.

Comments and Responses To Comments

Received During the Public Review Period

Initial Study/Mitigated Negative Declaration

City of Beverly Hills Municipal Water And Public Works Facility Project

Prepared for:

**City of Beverly Hills
Department of Planning and Community Development
455 North Rexford Drive, Room G-40
Beverly Hills, California 90210-4817
(310) 285-1123**

Prepared by:

**Jones & Stokes Associates, Inc.
2151 Michelson Drive, Suite 236
Irvine, California 92612
(949) 260-1080**

August 1998

Response to Comments

The City of Beverly Hills has prepared an Initial Study and proposed Mitigated Negative Declaration (IS/MND) under the provisions of the California Environmental Quality Act (CEQA) for the City's Municipal Water and Public Works Facility Project. Sections 15073 of the State CEQA Guidelines establishes opportunities for public and agency review of Negative Declarations. Section 15200 of the Guidelines state that the objectives of public review of agency proposals include sharing expertise, disclosing agency analysis, checking for accuracy, detecting omissions, discovering public concern and soliciting counterproposals. Additionally, Section 15088 of the CEQA Guidelines require agencies to respond to public comments received on Environmental Impact Reports. Public Resources Code Section 21091(f) and Section 15074 of the State CEQA Guidelines state that a Lead Agency must consider the Negative Declaration, together with any comments received, before approving the project. This document addresses the consideration of written comments received during the public review period.

A notice of the IS/MND was posted in the Los Angeles County Clerk's office, and a notice and copy of the IS/MND was submitted to the California State Clearinghouse for distribution to responsible agencies. The public review period began on June 26, 1998 when the City began soliciting comments for the project. However, the State granted and started the 20-day comment period on July 22, which ends on August 11, 1998. Only one written comment has been received to date regarding the proposed project. The California Department of Transportation (Caltrans) provided a letter to the City dated July 20, 1998, which is attached for reference. The comments and responses are provided below.

Comment 1: Any transportation of heavy construction equipment and/or materials which requires the use of oversized transport vehicles on State highways will require a Caltrans transportation permit. We recommend that large size truck trips be limited to off-peak commute periods and we acknowledge the contract shall curtail lane closure during peak hours.

Response 1: The construction of the project facilities is not anticipated to require the use of

Comments and Responses to Comments

2

oversized construction equipment or oversized transport vehicles. However, in the event that oversized equipment would be required, the contractor would be advised to comply with Caltrans' standards and the City would obtain a Caltrans transportation permit.

The curtailment of lane closures during peak hours (between the hours of 7:00-9:00 am, and 4:00-6:00 pm) is included as a mitigation measure that has been incorporated into the project.

No issues with respect to the adequacy of the environmental document have been raised. Therefore, no additional response is necessary.

Comment 2: You state in your July 14, 1998 transmittal letter that elements of the project would encroach upon Rte. 2 (Santa Monica Boulevard). In all instances where the proposed work falls within or affects the State Right-of-Way such as construction, grading, changes to hydraulic run-off, etc., a Caltrans encroachment permit will be needed.

Response 2: The City will apply for and obtain a Caltrans encroachment permit for project elements that fall within the Santa Monica Boulevard (State Route 2) Right-of-Way. The only project components that are expected to require this type of permit would include the extension of the product water pipeline across Santa Monica Boulevard at approximately Beverly Boulevard. No other impacts would be expected to Santa Monica Boulevard.

No issues with respect to the adequacy of the environmental document have been raised. Therefore, no additional response is necessary.

Comment 3: An encroachment permit application and six sets of plans should be sent to this office for Caltrans review (referring to District 7, located at 120 So. Spring Street, Los Angeles, CA 90012-3606).

Response 3: The City will submit a permit application and six sets of plans to Caltrans for review prior to beginning construction on the project pipelines.

No issues with respect to the adequacy of the environmental document have been raised. Therefore, no additional response is necessary.

Comments and Responses to Comments

3

Comment 4: A shortened review period for the negative declaration (20 days) is acceptable to Caltrans.

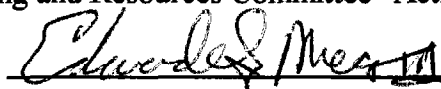

Response 4: The project has undergone a 20-day shortened review period and has considered all comments received within the public review period. No issues with respect to the adequacy of the environmental document have been raised. Therefore, no additional response is necessary.

**MWD**

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

7-10

August 25, 1998

To: Board of Directors (Water Planning and Resources Committee--Action)**From:** General Manager**Submitted by:** Debra C. Man, Chief
Planning and Resources
**Subject:** Groundwater Recovery Program for the Beverly Hills Desalter Project**RECOMMENDATIONS**

It is recommended that the Board:

1. Authorize the General Manager to execute a Groundwater Recovery Program agreement with the City of Beverly Hills to implement the Beverly Hills Desalter Project consistent with the major terms and conditions in this letter in form approved by the General Counsel, and
2. Certify that it has reviewed and considered the information provided in the Mitigated Negative Declaration for the Beverly Hills Desalter Project and adopt the Lead Agency's findings related to the project.

EXECUTIVE SUMMARY

The City of Beverly Hills has requested financial assistance for the Beverly Hills Desalter Project (Project) under the principles of Metropolitan's Groundwater Recovery Program (GRP). The proposed 2,600 acre-feet per year (AFY) project will increase groundwater production by treating groundwater containing high total dissolved solids (TDS), iron, manganese and hydrogen sulfide levels that exceed drinking water standards and then serving that treated water to meet municipal needs.

The proposed project complies with established GRP criteria. Subject to the Board's approval, the proposed project would be eligible for financial contributions adjusted annually to equal those project costs exceeding Metropolitan's treated noninterruptible water rate for up to \$250 per acre-foot of production for a period of 20 years.

Assistance to the Project is consistent with the Local Resources Program (LRP) rules adopted by the Board in June of this year. The transition terms of the LRP allow groundwater recovery applications received prior to December 1, 1997 to be "grandfathered" under the existing GRP rules. The Project application was received in September 1993.

Project operation would help the region meet the year 2020 goal of 500,000 AF for recovered groundwater and recycled water production. Currently, there is an estimated 125,000 AF shortfall in meeting the goal.

Board of Directors

-2-

August 25, 1998

DETAILED REPORT

The City of Beverly Hills (Beverly Hills) has requested financial assistance for the Beverly Hills Desalter Project (Project) under the principles of Metropolitan's Groundwater Recovery Program (GRP). Beverly Hills obtains all of its water supply from Metropolitan.

The proposed Project, located in the city of Beverly Hills, will increase regional groundwater production by treating groundwater pumped from the Hollywood Basin. The groundwater contains elevated levels of total dissolved solids (TDS), iron and manganese levels that do not meet drinking water standards. The treated water will be served to customers in Beverly Hills' service area. Attachment 1 provides a description of the Project's features.

The proposed Project capacity is 2,600 acre-feet per year (AFY). Because of the inherent uncertainty in determining the exact amount of production for a groundwater project, Metropolitan's GRP agreement will include a provision to allow increased production of 20 percent greater than the Project's operating capacity of 2,600 AFY. This could yield as much as 3,120 AFY of production eligible for financial assistance.

Financial assistance would be provided under an agreement term not to exceed 20 years. Metropolitan's financial contribution would be provided to Beverly Hills as a water sales payment through a yield-purchase arrangement similar to that used for previously approved GRP projects. The contribution would be adjusted annually based on the incurred project capital and operation and maintenance (O&M) costs which exceed Metropolitan's treated water rate. The maximum GRP contribution was set by the Board at \$250 per acre-foot. In order to reduce administrative burden for the local agency and Metropolitan, it is anticipated that the agreement may include a pre-established O&M labor estimate.

During the first year of operation (2001-2002), Metropolitan's contribution rate is estimated to be \$250 per acre-foot. A corresponding total contribution of approximately \$650,000 for fiscal year 2001-2002 will be included in future O&M budgets. Attachment 2 is a forecast of Metropolitan's annual contribution to the Project.

Participation in the Project is consistent with the transition terms of the Local Resources Program (LRP) which allows groundwater recovery applications received prior to December 1, 1997 to be "grandfathered" under the existing GRP rules. The transition window closes on December 9, 1998 at which time the GRP agreement must be fully executed. The Project application was received in September 1993 and meets the "grandfather" requirement. The transition terms were adopted by the Board in June 1998.

Project operation would help the region meet the year 2020 goal of 500,000 AFY for recovered groundwater and recycled water production. Currently, there is an estimated 125,000 AFY shortfall in meeting the goal.

Pursuant to the California Environmental Quality Act (CEQA), Beverly Hills, acting as the Lead Agency, has prepared and approved a Mitigated Negative Declaration for the Project. Metropolitan will not be responsible for implementing any of the mitigation measures associated with the Project. Metropolitan, as a Responsible Agency due to its financial participation in the

Board of Directors**-3-****August 25, 1998**

Project, is required to review and consider the information provided in the Mitigated Negative Declaration prior to reaching a decision on the Project. Copies of the Initial Study, Mitigated Negative Declaration, and Notice of Determination are available for your review in the office of the Executive Secretary. No further environmental documentation is necessary for you to act upon in this matter.

AMH:jpa**o:\clustr10\mmshared\board\beverlyhillsgp.amh****Attachment(s)**

Beverly Hills Desalter Project

Project Description

Overview

Located in the City of Beverly Hills (Beverly Hills), the Project will pump and treat brackish groundwater from the Hollywood Basin to augment Beverly Hills' domestic water supply. The Hollywood Basin is situated in the western part of Los Angeles County and underlies the city of Beverly Hills and community of West Hollywood. Total dissolved solids (TDS) concentrations in the Basin exceed the California Department of Health, Title 22 recommended level of 500 mg/L. Iron and manganese levels are at or above the recommended maximum levels. The proposed treatment plant will use reverse osmosis (RO) as the main treatment process to remove TDS, hardness, iron, manganese and trace organics. Blend water, untreated by RO membranes, will require iron and manganese removal by either oxidative filtration or the manganese greensand process. The Project will provide approximately 2,600 acre-feet per year of potable water to Beverly Hills customers. Proposed project facilities are shown in Figure 1.

Treatment Facilities

The proposed treatment plant will be located on Foothill Road, near the intersection of Third Street on approximately 0.1 acres of land at the northern end of property owned by Beverly Hills. Process equipment, above-ground chemical and waste storage tanks, and emergency power systems will be housed inside a treatment and administration building which may be entered by an existing access on Foothill Road. Only those portions of the building devoted to project treatment facilities are part of the Project. All buildings will be architecturally designed to blend with the surrounding environment.

Treatment Process Design

The proposed primary treatment process is reverse osmosis. Pre-treatment includes a commercial scale inhibitor and acid addition. Post-treatment will include a carbon dioxide air stripper. Water will be pumped from five production wells, all located within Beverly Hills. The approximate locations of the wells are:

- Civic Center Drive at Beverly Boulevard;
- Burton Way at Oakhurst Drive;
- North of Santa Monica Boulevard at Palm Drive;
- Beverly Gardens Park at Santa Monica Boulevard and Carmelita Avenue; and
- Burton Way at North Elm Drive (Well No. 1).

Water will be pumped from the wells to the treatment plant through pipelines within street rights-of-way. At the plant, the raw water will be divided into two treatment streams. One stream (about 40 percent) delivers raw water to the membranes for treatment, then air stripping for post-treatment. The second stream will be bypassed to the oxidative filtration or manganese greensand filters for iron and manganese removal and then blended with treated water. Injection of sulfuric acid and a commercial scale inhibitor will be applied to prevent scaling. The expected water production is 2,600 acre-feet per year.

RO Treatment

Pre-treated well water is then pumped through cartridge filters for solids removal. Water from the cartridge filters enters RO feed pumps where the pressure is boosted prior to entering the membrane assemblies. The membrane assemblies (two are proposed) will each have a permeate capacity (output) of 285 gallons per minute. The recovery is estimated to be 70 percent.

Post-Treatment

Permeate from the membrane system will undergo air stripping to remove hydrogen sulfide. Bypass water will also be air stripped for hydrogen sulfide removal. Permeate from the membrane system will then be blended with the bypass stream, where lime or calcium carbonate will be added to raise the alkalinity and buffer capacity of the product water. Sodium hypochlorite will be used for disinfection. The finished water will be retained in a clearwell until it is pumped to the distribution system via a 12-inch diameter pipeline that connects the water treatment plant to Beverly Hills' existing Sunset Reservoir.

Brine Disposal

About 336 acre-feet per year of concentrate (brine) will be discharged from the treatment plant to the local storm drain located on Foothill Road. The storm drain would convey the concentrate for ultimate discharge to Ballona Creek. The Los Angeles Regional Water Quality Control Board (RWQCB) has determined that this discharge complies with National Pollutant Discharge Elimination System requirements. An application for waste discharge will be submitted by Beverly Hills to the RWQCB prior to project design and construction.

Point of Connection

Project facilities terminate at the point of connection to Beverly Hills' existing Sunset Reservoir. Approximately one mile of 12-inch diameter potable water pipeline will be constructed to reach this connection. Brine disposal facilities end at the point of connection to the storm drain system. Depending on the final design, a booster pump station may be required to deliver product water to City customers.

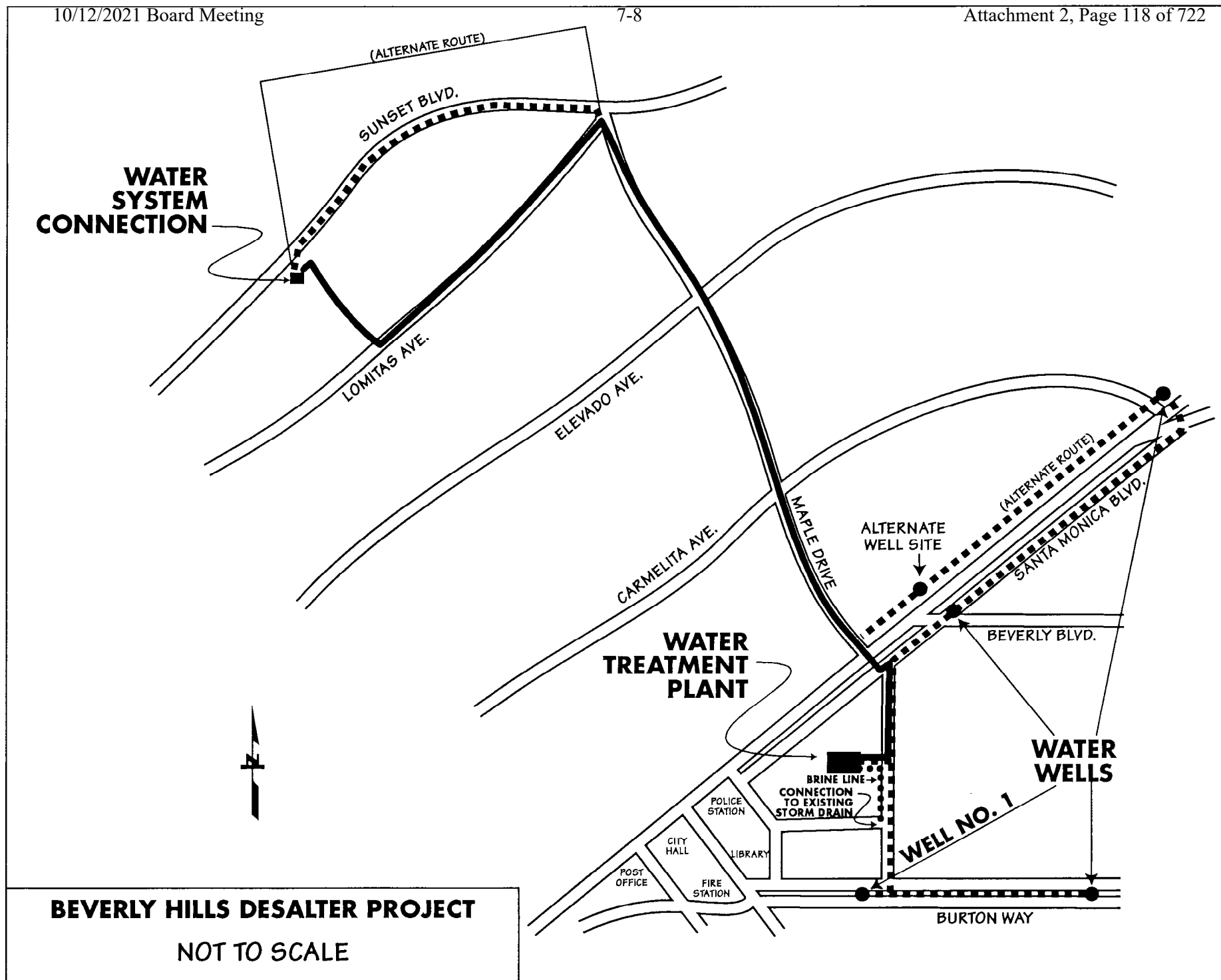


Figure 1

Metropolitan's Estimated Contribution

<u>Fiscal Year</u>	<u>Annual Contribution (\$)</u>
1999-2000	0
2000-2001	0
2001-2002	650,000
2002-2003	650,000
2003-2004	650,000
2004-2005	650,000
2005-2006	650,000
2006-2007	650,000
2007-2008	650,000
2008-2009	650,000
2009-2010	650,000
2010-2011	650,000
2011-2012	650,000
2012-2013	650,000
2013-2014	650,000
2014-2015	650,000
2015-2016	650,000
2016-2017	650,000
2017-2018	650,000
2018-2019	650,000
2019-2020	650,000
2020-2021	650,000

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



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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190167

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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.

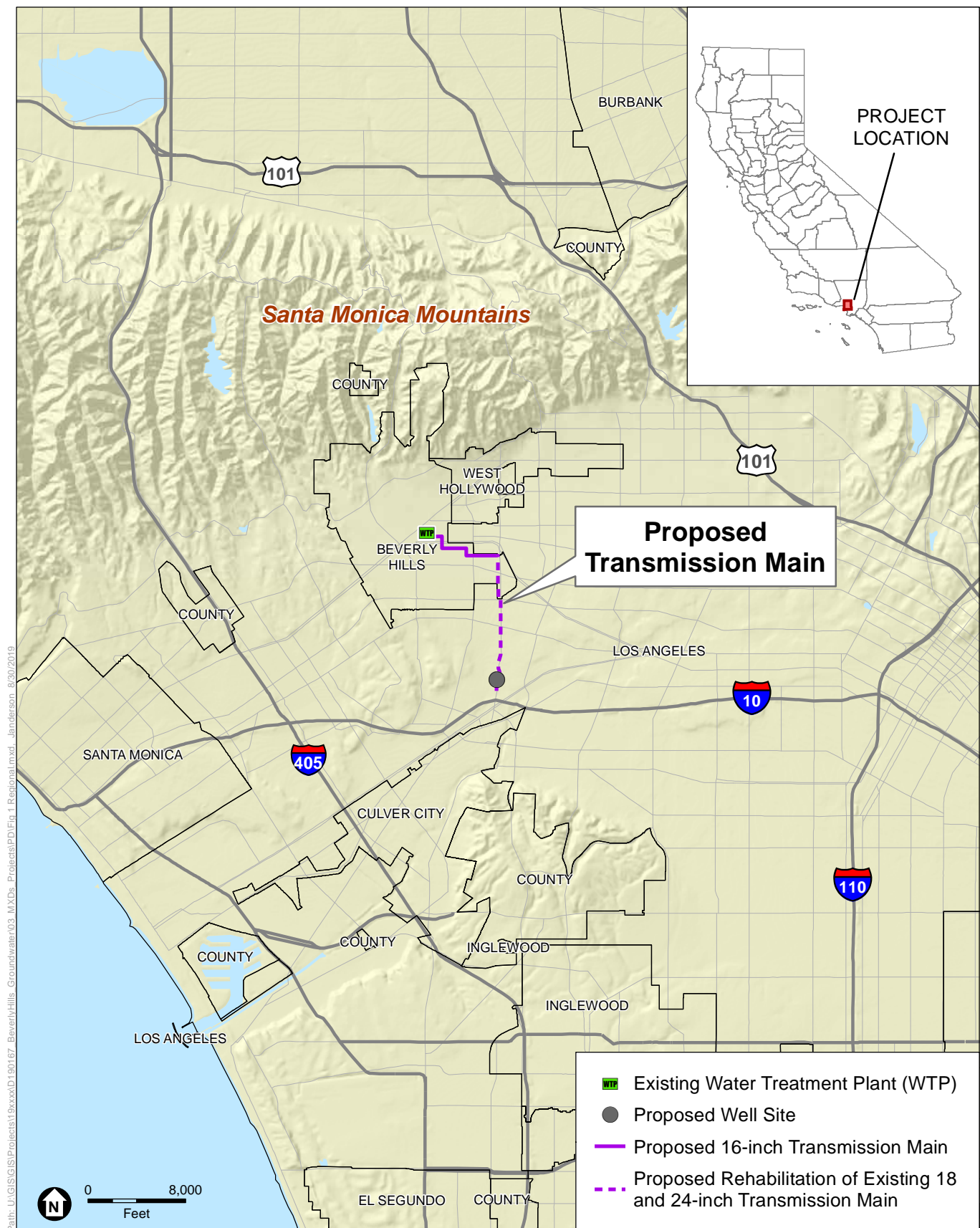
The proposed transmission main, in its entirety would be approximately four miles long. The proposed rehabilitation area of the transmission main (existing 18 and 24-inch inactive pipelines) would proceed north within La Cienega Boulevard to Olympic Boulevard and within Le Doux Road from Gregory Way 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

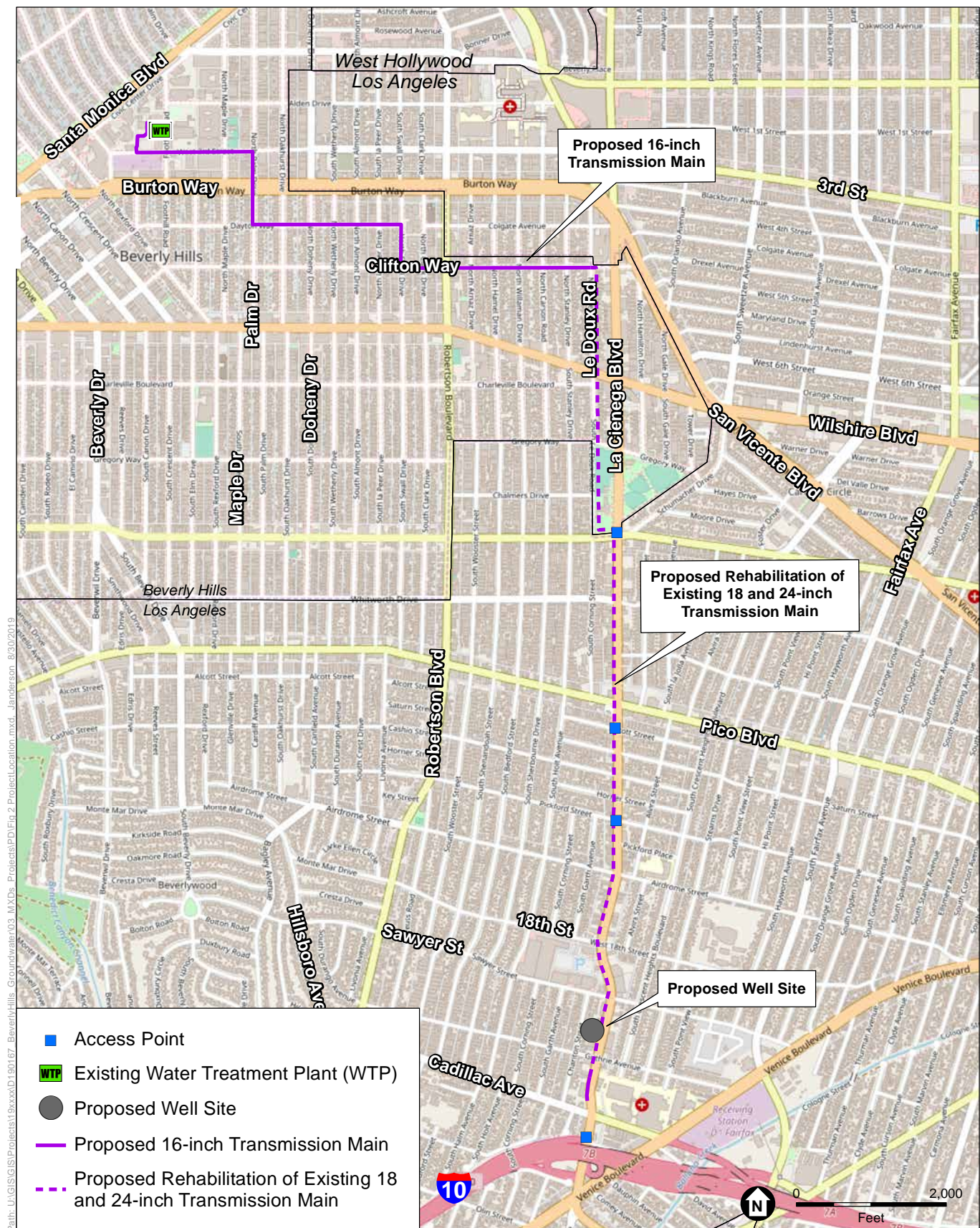
The proposed project includes: the demolition of existing structures at the proposed Well Site; the construction of one well within the La Brea Subarea; the rehabilitation of existing inactive 18 and 24-inch transmission main pipelines along La Cienega Boulevard; and the construction of a new 16-inch 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

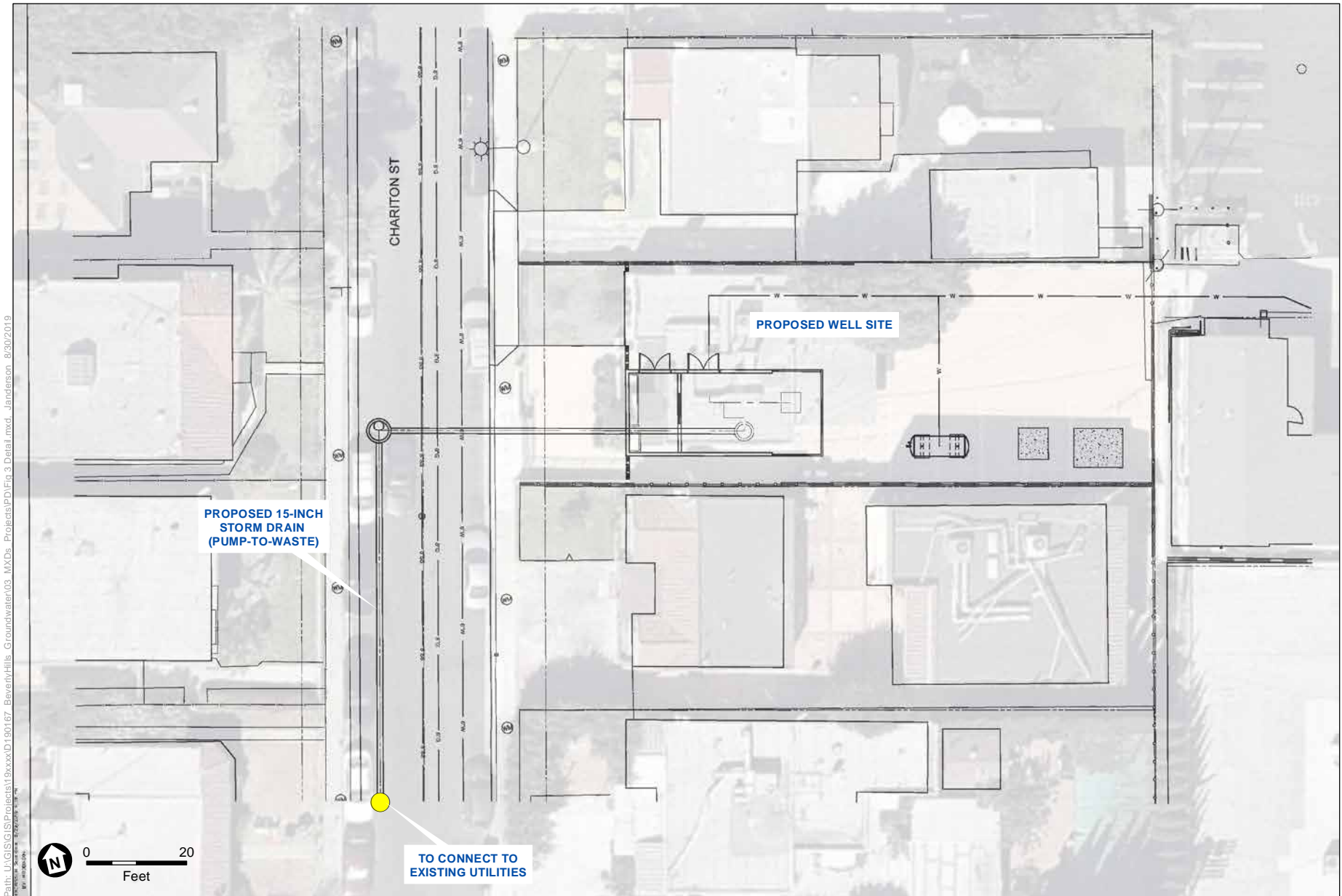
Figure 1
Regional Location



SOURCE: ESRI; City of Beverly Hills

La Brea Subarea Well and Transmission Main Project

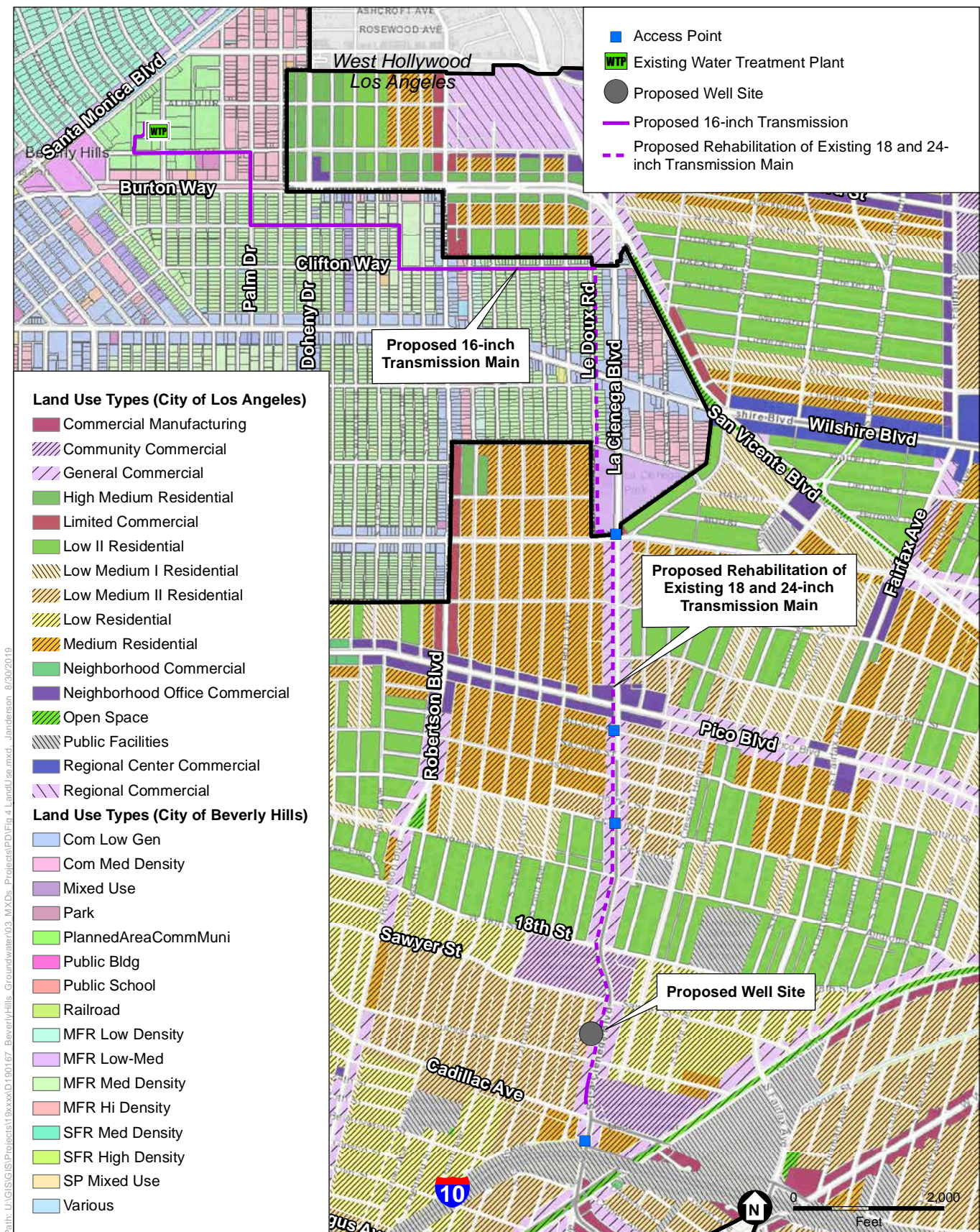
Figure 2
Project Location



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.



LAX\19xxxx\190167.00 - Beverly Hills MND Groundwater Wells and Pipeline Project\05 Graphics-GIS-Modeling\Illustrator

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

• • • • •

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.

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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.

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

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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 PM_{2.5}, 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.
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- 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 (CNDDDB) Rarefind 5. Electronic database, Sacramento, California. Available online at: <https://www.wildlife.ca.gov/Data/CNDDDB/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.

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.

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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- . 2014a. *Final Mitigated Negative Declaration for Toxic Air Contaminant Reduction for Compliance with SCAQMD Rules 1420.1 and 1402 at the Exide Technologies Facility in Vernon, CA*. State Clearinghouse No. 2014101040, December.
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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.

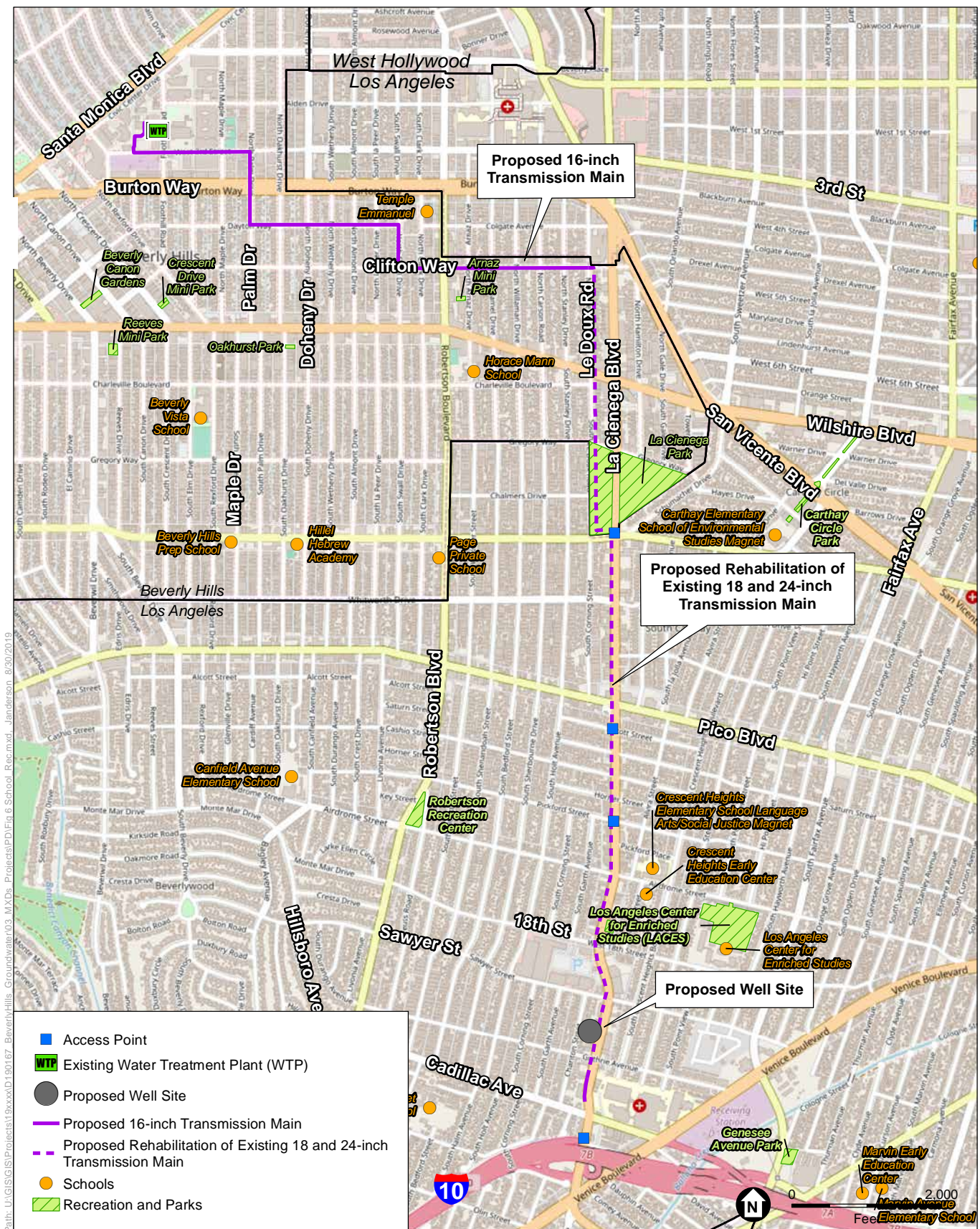
In the event of an accidental release during implementation of the proposed project, containment and clean up would be in accordance with existing applicable regulatory requirements. Title 8 CCR 5194 requires preparation of a hazards communication program identifying hazardous materials onsite and reducing 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.

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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.

References

- City of Beverly Hills, 2016. Urban Water Management Plan. Available online at <http://www.beverlyhills.org/departments/publicworks/utilities/waterservices/urbanwatermanagementplan/>, accessed June 2019.
- Federal Emergency Management Agency (FEMA), 2018. FEMA flood Map Service Center. Available online at: <https://msc.fema.gov/portal/home>, accessed June 2019.
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- Los Angeles Department of Water and Power, 2011. *Feasibility Report for Development Resources in the Santa Monica and Hollywood Basins*. December 2011.
- Michael Baker International, 2017. *La Brea Subarea, Wells, Water Treatment, and Transmission Main Project Preliminary Design Report*. May 2017.
- USGS, 2019a. Seismic Seiches. Available at: <https://earthquake.usgs.gov/learn/topics/seiche.php>, accessed June 2019.
- USGS, 2019b. Earthquake Glossary, Tsunami. Available at: <https://earthquake.usgs.gov/learn/glossary/?term=tsunami>, accessed June 2019.
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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.

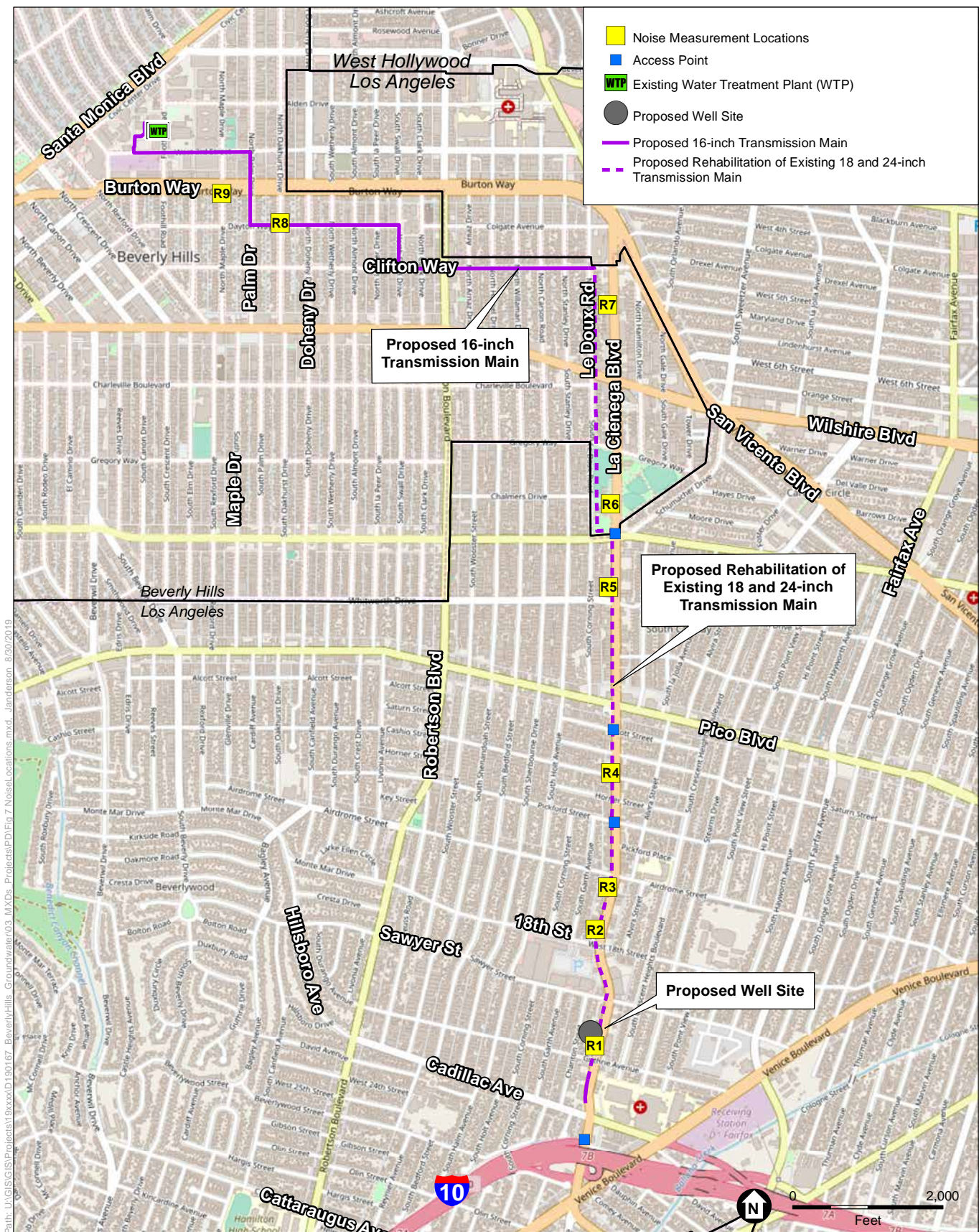
TABLE 6
AMBIENT NOISE LEVELS

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.

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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

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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

City of Beverly Hills, 2019a. Fire Department. Available online at:

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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

City of Beverly Hills, 2010. Circulation. Available online at:

http://www.beverlyhills.org/cbhfiles/storage/files/filebank/10281--6_Circulation%2001122010.pdf, accessed June 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.

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.

Appendix A

Air Quality, Greenhouse Gas and Energy Information

Beverly Hills MND
Regional Emissions

	ROG	NOx	CO	SO2	PM10 Total	PM2.5 Total
SUMMER	lb/day					
Well Site Demolition and Pump-to-Waste -2019	2.43	19.25	18.90	0.03	1.39	1.25
Well Construction Monitoring -2019	4.84	49.38	38.56	0.08	2.49	2.22
Well Construction Monitoring -2020	4.46	44.60	38.04	0.08	2.16	1.95
Well Equipping - 2020	0.64	7.31	3.62	0.01	0.40	0.32
Rehabilitation/ Transmission Main Installation - 2019	1.31	13.90	11.33	0.02	1.18	0.80
Rehabilitation/ Transmission Main Installation - 2020	1.23	12.92	11.22	0.02	1.00	0.71

	ROG	NOx	CO	SO2	PM10 Total	PM2.5 Total
WINTER	lb/day					
Well Site Demolition and Pump-to-Waste -2019	2.43	19.26	18.86	0.03	1.39	1.25
Well Construction Monitoring -2019	4.85	49.39	38.56	0.08	2.49	2.22
Well Construction Monitoring -2020	4.46	44.61	38.04	0.08	2.16	1.95
Well Equipping - 2020	0.64	7.31	3.62	0.01	0.40	0.32
Rehabilitation/ Transmission Main Installation - 2019	1.32	13.94	11.33	0.02	1.18	0.80
Rehabilitation/ Transmission Main Installation - 2020	1.24	12.95	11.22	0.02	1.00	0.71

	ROG	NOx	CO	SO2	PM10 Total	PM2.5 Total
Maximum	lb/day					
Well Site Demolition and Pump-to-Waste -2019	2.43	19.26	18.90	0.03	1.39	1.25
Well Construction Monitoring -2019	4.85	49.39	38.56	0.08	2.49	2.22
Well Construction Monitoring -2020	4.46	44.61	38.04	0.08	2.16	1.95
Well Equipping - 2020	0.64	7.31	3.62	0.01	0.40	0.32
Rehabilitation/ Transmission Main Installation - 2019	1.32	13.94	11.33	0.02	1.18	0.80
Rehabilitation/ Transmission Main Installation - 2020	1.24	12.95	11.22	0.02	1.00	0.71
Maximum Daily Emissions	4.85	49.39	38.56	0.08	2.49	2.22
SCAQMD Significance Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Above/(Under)	(70.15)	(50.61)	(511.44)	(149.92)	(147.51)	(52.78)
Exceeds Thresholds?	No	No	No	No	No	No

	ROG	NOx	CO	SO2	PM10 Total	PM2.5 Total
OVERLAP	lb/day					
Well Site Demolition and Pump to Waste - 2019 and Rehabilitation/Transmission Main Installation - 2019	4	33	30	0	3	2
Well Construction Monitoring - 2019 and Rehabilitation/Transmission Main Installation - 2019	6	63	50	0	4	3
Well Construction Monitoring - 2020 and Rehabilitation/Transmission Main Installation - 2020	6	58	49	0	3	3
Well Equipping - 2020 and Rehabilitation/Transmission Main Installation - 2020	2	20	15	0	1	1
Maximum Daily Emissions	6	63	50	0	4	3
SCAQMD Significance Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Above/(Under)	(68.83)	(36.67)	(500.11)	(149.89)	(146.33)	(51.98)
Exceeds Thresholds?	No	No	No	No	No	No

Beverly Hills MND
Localized Emissions

	NOx	CO	PM10 Total	PM2.5 Total
SUMMER	lb/day			
Well Site Demolition and Pump-to-Waste -2019	19.1186	18.3943	1.276	1.2187
Well Construction Monitoring -2019	48.4868	38.1598	2.326	2.1763
Well Construction Monitoring -2020	43.7703	37.6732	2.0544	1.9197
Well Equipping - 2020	6.689	3.2956	0.3189	0.2934
Rehabilitation/ Transmission Main Installation - 2019	11.2878	10.2879	0.7349	0.6771
Rehabilitation/ Transmission Main Installation - 2020	10.4666	10.2432	0.666	0.6138

	NOx	CO	PM10 Total	PM2.5 Total
WINTER	lb/day			
Well Site Demolition and Pump-to-Waste -2019	19.12	18.39	1.28	1.22
Well Construction Monitoring -2019	48.49	38.16	2.33	2.18
Well Construction Monitoring -2020	43.77	37.67	2.05	1.92
Well Equipping - 2020	6.69	3.30	0.32	0.29
Rehabilitation/ Transmission Main Installation - 2019	11.29	10.29	0.73	0.68
Rehabilitation/ Transmission Main Installation - 2020	10.47	10.24	0.67	0.61

	NOx	CO	PM10 Total	PM2.5 Total
Maximum	lb/day			
Well Site Demolition and Pump-to-Waste -2019	19.12	18.39	1.28	1.22
Well Construction Monitoring -2019	48.49	38.16	2.33	2.18
Well Construction Monitoring -2020	43.77	37.67	2.05	1.92
Well Equipping - 2020	6.69	3.30	0.32	0.29
Rehabilitation/ Transmission Main Installation - 2019	11.29	10.29	0.73	0.68
Rehabilitation/ Transmission Main Installation - 2020	10.47	10.24	0.67	0.61

	NOx	CO	PM10 Total	PM2.5 Total
OVERLAP	lb/day			
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 Emissions	60	48	3.1	2.9
SCAQMD Significance Thresholds	103	562	4.0	3.0
Above/(Under)	(43.2)	(513.6)	(0.9)	(0.15)
Exceeds Thresholds?	No	No	No	No

SRA 2, Project Site 1 Acres, 25 m distance to sensitive receptor

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1.0 Project Characteristics**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Industrial	0.00	User Defined Unit	2.70	117,140.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	33
Climate Zone	11			Operational Year	2021
Utility Company	Los Angeles Department of Water & Power				
CO2 Intensity (lb/MWhr)	1227.89	CH4 Intensity (lb/MWhr)	0.029	N2O Intensity (lb/MWhr)	0.006

1.3 User Entered Comments & Non-Default Data

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Project Characteristics -

Land Use - assume 1 well of 660 SF each + (4 miles of new transmission main x 4 LF wide) + (8000 LF proposed rehab x 4 LF wide) = approx 117,140 SF impacted

Construction Phase - per Table 1 in Project Description

Off-road Equipment - per Table 2 Project Description

Off-road Equipment - per Table 2 of Project Description

Off-road Equipment - per Table 2 Project Description

Off-road Equipment - per Table 2 of Project Description

Demolition - 67 CY construction material (assume wood, uncompacted) => 400 lbs/CY * 67 CY = 26,800 lbs = 12 metric tons

Conversion source: CalRecycle

Trips and VMT - one well only

Well construction/equipping: 76 hauling trucks * 2 = 152 truck trips

Transmission main: 11,018 CY + 185 CY soil = 11203 CY soil / 16 CY/truck = 700 trucks or 1400 hauling truck trips.

Concrete- 10,000 SF * 1/3 LF thick = 3,333 CF * 1 CY/27 CF = 123 CY / 16 CY/truck = 7.7 trucks for vendor or less than 1 per day

Grading - 11 CY soil excavated for wells, 11,018 CY soil excavated for new transmission, 185 CY soil excavated for rehab = 11214 CY

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	220.00	174.00
tblConstructionPhase	NumDays	20.00	44.00
tblConstructionPhase	NumDays	6.00	153.00
tblConstructionPhase	NumDays	3.00	87.00
tblGrading	MaterialExported	0.00	11,214.00
tblLandUse	LandUseSquareFeet	0.00	117,140.00
tblLandUse	LotAcreage	0.00	2.70
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00

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tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	3.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	PhaseName		Well Construction Monitoring
tblOffRoadEquipment	PhaseName		Well Construction Monitoring
tblOffRoadEquipment	PhaseName		Well Construction Monitoring
tblOffRoadEquipment	PhaseName		Well Equipping
tblOffRoadEquipment	PhaseName		Well Site Demolition and Pump-to-Waste
tblOffRoadEquipment	PhaseName		Well Site Demolition and Pump-to-Waste
tblOffRoadEquipment	PhaseName		Rehabilitation/Transmission Main Installation
tblOffRoadEquipment	PhaseName		Well Site Demolition and Pump-to-Waste
tblOffRoadEquipment	PhaseName		Rehabilitation/Transmission Main Installation
tblOffRoadEquipment	PhaseName		Well Site Demolition and Pump-to-Waste
tblOffRoadEquipment	PhaseName		Well Equipping
tblOffRoadEquipment	PhaseName		Well Construction Monitoring

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tblOffRoadEquipment	PhaseName		Well Construction Monitoring
tblOffRoadEquipment	PhaseName		Well Construction Monitoring
tblOffRoadEquipment	PhaseName		Well Construction Monitoring
tblOffRoadEquipment	PhaseName		Well Construction Monitoring
tblOffRoadEquipment	PhaseName		Well Site Demolition and Pump-to-Waste
tblOffRoadEquipment	PhaseName		Rehabilitation/Transmission Main Installation
tblOffRoadEquipment	UsageHours	6.00	8.00
tblOffRoadEquipment	UsageHours	7.00	8.00
tblTripsAndVMT	HaulingTripNumber	4.00	14.00
tblTripsAndVMT	HaulingTripNumber	0.00	1,400.00
tblTripsAndVMT	HaulingTripNumber	0.00	152.00
tblTripsAndVMT	HaulingTripNumber	0.00	152.00
tblTripsAndVMT	VendorTripNumber	19.00	1.00
tblTripsAndVMT	VendorTripNumber	0.00	3.00
tblTripsAndVMT	VendorTripNumber	0.00	3.00
tblTripsAndVMT	WorkerTripNumber	18.00	10.00
tblTripsAndVMT	WorkerTripNumber	50.00	10.00
tblTripsAndVMT	WorkerTripNumber	30.00	4.00
tblTripsAndVMT	WorkerTripNumber	5.00	4.00

2.0 Emissions Summary

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2.1 Overall Construction**Unmitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2019	0.1501	1.4291	1.2126	2.3100e-003	0.0204	0.0781	0.0985	5.0500e-003	0.0735	0.0785	0.0000	207.2945	207.2945	0.0471	0.0000	208.4707
2020	0.2600	2.7128	2.1181	4.6500e-003	0.0285	0.1274	0.1559	7.3600e-003	0.1187	0.1260	0.0000	413.0153	413.0153	0.1042	0.0000	415.6192
Maximum	0.2600	2.7128	2.1181	4.6500e-003	0.0285	0.1274	0.1559	7.3600e-003	0.1187	0.1260	0.0000	413.0153	413.0153	0.1042	0.0000	415.6192

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2019	0.1501	1.4291	1.2126	2.3100e-003	0.0191	0.0781	0.0972	4.8900e-003	0.0735	0.0784	0.0000	207.2943	207.2943	0.0471	0.0000	208.4705
2020	0.2600	2.7128	2.1181	4.6500e-003	0.0273	0.1274	0.1547	7.2100e-003	0.1187	0.1259	0.0000	413.0148	413.0148	0.1042	0.0000	415.6188
Maximum	0.2600	2.7128	2.1181	4.6500e-003	0.0273	0.1274	0.1547	7.2100e-003	0.1187	0.1259	0.0000	413.0148	413.0148	0.1042	0.0000	415.6188

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	5.19	0.00	0.99	2.50	0.00	0.15	0.00	0.00	0.00	0.00	0.00	0.00

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Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	10-1-2019	12-31-2019	1.5474	1.5474
2	1-1-2020	3-31-2020	2.0561	2.0561
3	4-1-2020	6-30-2020	0.5562	0.5562
4	7-1-2020	9-30-2020	0.2610	0.2610
		Highest	2.0561	2.0561

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.4782	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.4782	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

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2.2 Overall Operational**Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.4782	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.4782	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail**Construction Phase**

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Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Well Site Demolition and Pump-to-Waste	Demolition	10/1/2019	11/29/2019	5	44	
2	Rehabilitation/Transmission Main Installation	Building Construction	10/1/2019	5/29/2020	5	174	
3	Well Construction Monitoring	Site Preparation	12/2/2019	3/31/2020	5	87	
4	Well Equipping	Grading	4/1/2020	10/30/2020	5	153	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Annual

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Well Site Demolition and Pump-to-Waste	Crushing/Proc. Equipment	2	8.00	85	0.78
Well Site Demolition and Pump-to-Waste	Dumpers/Tenders	1	8.00	16	0.38
Well Site Demolition and Pump-to-Waste	Excavators	1	8.00	158	0.38
Well Site Demolition and Pump-to-Waste	Forklifts	1	8.00	89	0.20
Well Site Demolition and Pump-to-Waste	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Well Site Demolition and Pump-to-Waste	Trenchers	1	8.00	78	0.50
Well Construction Monitoring	Air Compressors	1	8.00	78	0.48
Well Construction Monitoring	Bore/Drill Rigs	2	8.00	221	0.50
Well Construction Monitoring	Cranes	1	8.00	231	0.29
Well Construction Monitoring	Generator Sets	1	8.00	84	0.74
Well Construction Monitoring	Off-Highway Trucks	1	8.00	402	0.38
Well Construction Monitoring	Other Construction Equipment	1	8.00	172	0.42
Well Construction Monitoring	Other Material Handling Equipment	3	8.00	168	0.40
Well Construction Monitoring	Pumps	1	8.00	84	0.74
Well Construction Monitoring	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Well Equipping	Cranes	1	8.00	231	0.29
Well Equipping	Forklifts	1	8.00	89	0.20
Rehabilitation/Transmission Main Installation	Dumpers/Tenders	1	6.00	16	0.38
Rehabilitation/Transmission Main Installation	Excavators	1	7.00	158	0.38
Rehabilitation/Transmission Main Installation	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Rehabilitation/Transmission Main Installation	Trenchers	1	8.00	78	0.50

Trips and VMT

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Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Well Site Demolition and Pump-to-Waste	7	10.00	0.00	14.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Well Construction	12	4.00	3.00	152.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Well Equipping	2	4.00	3.00	152.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Rehabilitation/Transmission Main Installation	5	10.00	1.00	1,400.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Exposed Area

3.2 Well Site Demolition and Pump-to-Waste - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					1.3000e-004	0.0000	1.3000e-004	2.0000e-005	0.0000	2.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0523	0.4206	0.4047	6.1000e-004		0.0280	0.0280		0.0268	0.0268	0.0000	53.7639	53.7639	0.0105	0.0000	54.0266
Total	0.0523	0.4206	0.4047	6.1000e-004	1.3000e-004	0.0280	0.0282	2.0000e-005	0.0268	0.0268	0.0000	53.7639	53.7639	0.0105	0.0000	54.0266

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3.2 Well Site Demolition and Pump-to-Waste - 2019**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	7.0000e-005	2.2200e-003	4.7000e-004	1.0000e-005	1.2000e-004	1.0000e-005	1.3000e-004	3.0000e-005	1.0000e-005	4.0000e-005	0.0000	0.5451	0.5451	4.0000e-005	0.0000	0.5460
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.1000e-003	9.2000e-004	9.9900e-003	3.0000e-005	2.4100e-003	2.0000e-005	2.4300e-003	6.4000e-004	2.0000e-005	6.6000e-004	0.0000	2.3174	2.3174	8.0000e-005	0.0000	2.3194
Total	1.1700e-003	3.1400e-003	0.0105	4.0000e-005	2.5300e-003	3.0000e-005	2.5600e-003	6.7000e-004	3.0000e-005	7.0000e-004	0.0000	2.8625	2.8625	1.2000e-004	0.0000	2.8654

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					5.0000e-005	0.0000	5.0000e-005	1.0000e-005	0.0000	1.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0523	0.4206	0.4047	6.1000e-004		0.0280	0.0280		0.0268	0.0268	0.0000	53.7638	53.7638	0.0105	0.0000	54.0266
Total	0.0523	0.4206	0.4047	6.1000e-004	5.0000e-005	0.0280	0.0281	1.0000e-005	0.0268	0.0268	0.0000	53.7638	53.7638	0.0105	0.0000	54.0266

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3.2 Well Site Demolition and Pump-to-Waste - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	7.0000e-005	2.2200e-003	4.7000e-004	1.0000e-005	1.2000e-004	1.0000e-005	1.3000e-004	3.0000e-005	1.0000e-005	4.0000e-005	0.0000	0.5451	0.5451	4.0000e-005	0.0000	0.5460
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.1000e-003	9.2000e-004	9.9900e-003	3.0000e-005	2.4100e-003	2.0000e-005	2.4300e-003	6.4000e-004	2.0000e-005	6.6000e-004	0.0000	2.3174	2.3174	8.0000e-005	0.0000	2.3194
Total	1.1700e-003	3.1400e-003	0.0105	4.0000e-005	2.5300e-003	3.0000e-005	2.5600e-003	6.7000e-004	3.0000e-005	7.0000e-004	0.0000	2.8625	2.8625	1.2000e-004	0.0000	2.8654

3.3 Rehabilitation/Transmission Main Installation - 2019**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0391	0.3725	0.3395	4.8000e-004		0.0243	0.0243		0.0224	0.0224	0.0000	43.1656	43.1656	0.0134	0.0000	43.4999
Total	0.0391	0.3725	0.3395	4.8000e-004		0.0243	0.0243		0.0224	0.0224	0.0000	43.1656	43.1656	0.0134	0.0000	43.4999

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3.3 Rehabilitation/Transmission Main Installation - 2019**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.5200e-003	0.0840	0.0179	2.1000e-004	0.0102	3.0000e-004	0.0105	2.6300e-003	2.9000e-004	2.9200e-003	0.0000	20.6754	20.6754	1.4600e-003	0.0000	20.7119
Vendor	1.4000e-004	3.9000e-003	1.0700e-003	1.0000e-005	2.1000e-004	2.0000e-005	2.3000e-004	6.0000e-005	2.0000e-005	8.0000e-005	0.0000	0.8252	0.8252	6.0000e-005	0.0000	0.8266
Worker	1.6500e-003	1.3800e-003	0.0150	4.0000e-005	3.6200e-003	3.0000e-005	3.6500e-003	9.6000e-004	3.0000e-005	9.9000e-004	0.0000	3.4761	3.4761	1.2000e-004	0.0000	3.4791
Total	4.3100e-003	0.0893	0.0339	2.6000e-004	0.0140	3.5000e-004	0.0144	3.6500e-003	3.4000e-004	3.9900e-003	0.0000	24.9767	24.9767	1.6400e-003	0.0000	25.0176

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0391	0.3725	0.3395	4.8000e-004		0.0243	0.0243		0.0224	0.0224	0.0000	43.1656	43.1656	0.0134	0.0000	43.4999
Total	0.0391	0.3725	0.3395	4.8000e-004		0.0243	0.0243		0.0224	0.0224	0.0000	43.1656	43.1656	0.0134	0.0000	43.4999

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3.3 Rehabilitation/Transmission Main Installation - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.5200e-003	0.0840	0.0179	2.1000e-004	0.0102	3.0000e-004	0.0105	2.6300e-003	2.9000e-004	2.9200e-003	0.0000	20.6754	20.6754	1.4600e-003	0.0000	20.7119
Vendor	1.4000e-004	3.9000e-003	1.0700e-003	1.0000e-005	2.1000e-004	2.0000e-005	2.3000e-004	6.0000e-005	2.0000e-005	8.0000e-005	0.0000	0.8252	0.8252	6.0000e-005	0.0000	0.8266
Worker	1.6500e-003	1.3800e-003	0.0150	4.0000e-005	3.6200e-003	3.0000e-005	3.6500e-003	9.6000e-004	3.0000e-005	9.9000e-004	0.0000	3.4761	3.4761	1.2000e-004	0.0000	3.4791
Total	4.3100e-003	0.0893	0.0339	2.6000e-004	0.0140	3.5000e-004	0.0144	3.6500e-003	3.4000e-004	3.9900e-003	0.0000	24.9767	24.9767	1.6400e-003	0.0000	25.0176

3.3 Rehabilitation/Transmission Main Installation - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0598	0.5652	0.5531	7.9000e-004		0.0360	0.0360		0.0331	0.0331	0.0000	69.1543	69.1543	0.0219	0.0000	69.7013
Total	0.0598	0.5652	0.5531	7.9000e-004		0.0360	0.0360		0.0331	0.0331	0.0000	69.1543	69.1543	0.0219	0.0000	69.7013

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3.3 Rehabilitation/Transmission Main Installation - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	3.8300e-003	0.1290	0.0284	3.4000e-004	0.0109	4.0000e-004	0.0113	2.8900e-003	3.8000e-004	3.2800e-003	0.0000	33.4892	33.4892	2.3300e-003	0.0000	33.5475
Vendor	2.0000e-004	5.8500e-003	1.5800e-003	1.0000e-005	3.4000e-004	3.0000e-005	3.7000e-004	1.0000e-004	3.0000e-005	1.2000e-004	0.0000	1.3415	1.3415	9.0000e-005	0.0000	1.3436
Worker	2.4900e-003	2.0100e-003	0.0222	6.0000e-005	5.9200e-003	5.0000e-005	5.9700e-003	1.5700e-003	5.0000e-005	1.6200e-003	0.0000	5.5153	5.5153	1.7000e-004	0.0000	5.5196
Total	6.5200e-003	0.1369	0.0523	4.1000e-004	0.0172	4.8000e-004	0.0176	4.5600e-003	4.6000e-004	5.0200e-003	0.0000	40.3460	40.3460	2.5900e-003	0.0000	40.4107

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0598	0.5652	0.5531	7.9000e-004		0.0360	0.0360		0.0331	0.0331	0.0000	69.1542	69.1542	0.0219	0.0000	69.7012
Total	0.0598	0.5652	0.5531	7.9000e-004		0.0360	0.0360		0.0331	0.0331	0.0000	69.1542	69.1542	0.0219	0.0000	69.7012

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3.3 Rehabilitation/Transmission Main Installation - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	3.8300e-003	0.1290	0.0284	3.4000e-004	0.0109	4.0000e-004	0.0113	2.8900e-003	3.8000e-004	3.2800e-003	0.0000	33.4892	33.4892	2.3300e-003	0.0000	33.5475
Vendor	2.0000e-004	5.8500e-003	1.5800e-003	1.0000e-005	3.4000e-004	3.0000e-005	3.7000e-004	1.0000e-004	3.0000e-005	1.2000e-004	0.0000	1.3415	1.3415	9.0000e-005	0.0000	1.3436
Worker	2.4900e-003	2.0100e-003	0.0222	6.0000e-005	5.9200e-003	5.0000e-005	5.9700e-003	1.5700e-003	5.0000e-005	1.6200e-003	0.0000	5.5153	5.5153	1.7000e-004	0.0000	5.5196
Total	6.5200e-003	0.1369	0.0523	4.1000e-004	0.0172	4.8000e-004	0.0176	4.5600e-003	4.6000e-004	5.0200e-003	0.0000	40.3460	40.3460	2.5900e-003	0.0000	40.4107

3.4 Well Construction Monitoring - 2019**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					2.0100e-003	0.0000	2.0100e-003	2.4000e-004	0.0000	2.4000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0527	0.5334	0.4198	9.0000e-004		0.0254	0.0254		0.0239	0.0239	0.0000	79.7407	79.7407	0.0212	0.0000	80.2716
Total	0.0527	0.5334	0.4198	9.0000e-004	2.0100e-003	0.0254	0.0274	2.4000e-004	0.0239	0.0242	0.0000	79.7407	79.7407	0.0212	0.0000	80.2716

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3.4 Well Construction Monitoring - 2019**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.8000e-004	6.0800e-003	1.2900e-003	2.0000e-005	1.0600e-003	2.0000e-005	1.0900e-003	2.7000e-004	2.0000e-005	2.9000e-004	0.0000	1.4965	1.4965	1.1000e-004	0.0000	1.4992
Vendor	1.4000e-004	3.9000e-003	1.0700e-003	1.0000e-005	2.1000e-004	2.0000e-005	2.3000e-004	6.0000e-005	2.0000e-005	8.0000e-005	0.0000	0.8252	0.8252	6.0000e-005	0.0000	0.8266
Worker	2.2000e-004	1.8000e-004	2.0000e-003	1.0000e-005	4.8000e-004	0.0000	4.9000e-004	1.3000e-004	0.0000	1.3000e-004	0.0000	0.4635	0.4635	2.0000e-005	0.0000	0.4639
Total	5.4000e-004	0.0102	4.3600e-003	4.0000e-005	1.7500e-003	4.0000e-005	1.8100e-003	4.6000e-004	4.0000e-005	5.0000e-004	0.0000	2.7852	2.7852	1.9000e-004	0.0000	2.7896

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					7.8000e-004	0.0000	7.8000e-004	1.0000e-004	0.0000	1.0000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0527	0.5334	0.4198	9.0000e-004		0.0254	0.0254		0.0239	0.0239	0.0000	79.7406	79.7406	0.0212	0.0000	80.2715
Total	0.0527	0.5334	0.4198	9.0000e-004	7.8000e-004	0.0254	0.0262	1.0000e-004	0.0239	0.0240	0.0000	79.7406	79.7406	0.0212	0.0000	80.2715

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3.4 Well Construction Monitoring - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	1.8000e-004	6.0800e-003	1.2900e-003	2.0000e-005	1.0600e-003	2.0000e-005	1.0900e-003	2.7000e-004	2.0000e-005	2.9000e-004	0.0000	1.4965	1.4965	1.1000e-004	0.0000	1.4992
Vendor	1.4000e-004	3.9000e-003	1.0700e-003	1.0000e-005	2.1000e-004	2.0000e-005	2.3000e-004	6.0000e-005	2.0000e-005	8.0000e-005	0.0000	0.8252	0.8252	6.0000e-005	0.0000	0.8266
Worker	2.2000e-004	1.8000e-004	2.0000e-003	1.0000e-005	4.8000e-004	0.0000	4.9000e-004	1.3000e-004	0.0000	1.3000e-004	0.0000	0.4635	0.4635	2.0000e-005	0.0000	0.4639
Total	5.4000e-004	0.0102	4.3600e-003	4.0000e-005	1.7500e-003	4.0000e-005	1.8100e-003	4.6000e-004	4.0000e-005	5.0000e-004	0.0000	2.7852	2.7852	1.9000e-004	0.0000	2.7896

3.4 Well Construction Monitoring - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					2.0100e-003	0.0000	2.0100e-003	2.4000e-004	0.0000	2.4000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1435	1.4225	1.2244	2.6500e-003		0.0662	0.0662		0.0623	0.0623	0.0000	231.6508	231.6508	0.0625	0.0000	233.2120
Total	0.1435	1.4225	1.2244	2.6500e-003	2.0100e-003	0.0662	0.0682	2.4000e-004	0.0623	0.0626	0.0000	231.6508	231.6508	0.0625	0.0000	233.2120

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3.4 Well Construction Monitoring - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	5.0000e-004	0.0169	3.7200e-003	4.0000e-005	1.2200e-003	5.0000e-005	1.2800e-003	3.3000e-004	5.0000e-005	3.8000e-004	0.0000	4.3766	4.3766	3.0000e-004	0.0000	4.3843
Vendor	3.5000e-004	0.0106	2.8600e-003	3.0000e-005	6.1000e-004	5.0000e-005	6.6000e-004	1.8000e-004	5.0000e-005	2.2000e-004	0.0000	2.4222	2.4222	1.5000e-004	0.0000	2.4260
Worker	6.0000e-004	4.8000e-004	5.3500e-003	1.0000e-005	1.4200e-003	1.0000e-005	1.4400e-003	3.8000e-004	1.0000e-005	3.9000e-004	0.0000	1.3278	1.3278	4.0000e-005	0.0000	1.3288
Total	1.4500e-003	0.0279	0.0119	8.0000e-005	3.2500e-003	1.1000e-004	3.3800e-003	8.9000e-004	1.1000e-004	9.9000e-004	0.0000	8.1266	8.1266	4.9000e-004	0.0000	8.1391

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					7.8000e-004	0.0000	7.8000e-004	1.0000e-004	0.0000	1.0000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1435	1.4225	1.2244	2.6500e-003		0.0662	0.0662		0.0623	0.0623	0.0000	231.6505	231.6505	0.0625	0.0000	233.2117
Total	0.1435	1.4225	1.2244	2.6500e-003	7.8000e-004	0.0662	0.0670	1.0000e-004	0.0623	0.0624	0.0000	231.6505	231.6505	0.0625	0.0000	233.2117

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3.4 Well Construction Monitoring - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	5.0000e-004	0.0169	3.7200e-003	4.0000e-005	1.2200e-003	5.0000e-005	1.2800e-003	3.3000e-004	5.0000e-005	3.8000e-004	0.0000	4.3766	4.3766	3.0000e-004	0.0000	4.3843
Vendor	3.5000e-004	0.0106	2.8600e-003	3.0000e-005	6.1000e-004	5.0000e-005	6.6000e-004	1.8000e-004	5.0000e-005	2.2000e-004	0.0000	2.4222	2.4222	1.5000e-004	0.0000	2.4260
Worker	6.0000e-004	4.8000e-004	5.3500e-003	1.0000e-005	1.4200e-003	1.0000e-005	1.4400e-003	3.8000e-004	1.0000e-005	3.9000e-004	0.0000	1.3278	1.3278	4.0000e-005	0.0000	1.3288
Total	1.4500e-003	0.0279	0.0119	8.0000e-005	3.2500e-003	1.1000e-004	3.3800e-003	8.9000e-004	1.1000e-004	9.9000e-004	0.0000	8.1266	8.1266	4.9000e-004	0.0000	8.1391

3.5 Well Equipping - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0457	0.5117	0.2521	5.6000e-004		0.0244	0.0244		0.0225	0.0225	0.0000	49.0531	49.0531	0.0159	0.0000	49.4497
Total	0.0457	0.5117	0.2521	5.6000e-004	0.0000	0.0244	0.0244	0.0000	0.0225	0.0225	0.0000	49.0531	49.0531	0.0159	0.0000	49.4497

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3.5 Well Equipping - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	6.7000e-004	0.0226	4.9700e-003	6.0000e-005	1.3100e-003	7.0000e-005	1.3800e-003	3.6000e-004	7.0000e-005	4.3000e-004	0.0000	5.8579	5.8579	4.1000e-004	0.0000	5.8682
Vendor	8.3000e-004	0.0249	6.7300e-003	6.0000e-005	1.4500e-003	1.2000e-004	1.5600e-003	4.2000e-004	1.1000e-004	5.3000e-004	0.0000	5.7014	5.7014	3.6000e-004	0.0000	5.7104
Worker	1.4100e-003	1.1400e-003	0.0126	3.0000e-005	3.3500e-003	3.0000e-005	3.3800e-003	8.9000e-004	3.0000e-005	9.2000e-004	0.0000	3.1253	3.1253	1.0000e-004	0.0000	3.1278
Total	2.9100e-003	0.0486	0.0243	1.5000e-004	6.1100e-003	2.2000e-004	6.3200e-003	1.6700e-003	2.1000e-004	1.8800e-003	0.0000	14.6847	14.6847	8.7000e-004	0.0000	14.7064

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0457	0.5117	0.2521	5.6000e-004		0.0244	0.0244		0.0225	0.0225	0.0000	49.0530	49.0530	0.0159	0.0000	49.4496
Total	0.0457	0.5117	0.2521	5.6000e-004	0.0000	0.0244	0.0244	0.0000	0.0225	0.0225	0.0000	49.0530	49.0530	0.0159	0.0000	49.4496

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3.5 Well Equipping - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	6.7000e-004	0.0226	4.9700e-003	6.0000e-005	1.3100e-003	7.0000e-005	1.3800e-003	3.6000e-004	7.0000e-005	4.3000e-004	0.0000	5.8579	5.8579	4.1000e-004	0.0000	5.8682
Vendor	8.3000e-004	0.0249	6.7300e-003	6.0000e-005	1.4500e-003	1.2000e-004	1.5600e-003	4.2000e-004	1.1000e-004	5.3000e-004	0.0000	5.7014	5.7014	3.6000e-004	0.0000	5.7104
Worker	1.4100e-003	1.1400e-003	0.0126	3.0000e-005	3.3500e-003	3.0000e-005	3.3800e-003	8.9000e-004	3.0000e-005	9.2000e-004	0.0000	3.1253	3.1253	1.0000e-004	0.0000	3.1278
Total	2.9100e-003	0.0486	0.0243	1.5000e-004	6.1100e-003	2.2000e-004	6.3200e-003	1.6700e-003	2.1000e-004	1.8800e-003	0.0000	14.6847	14.6847	8.7000e-004	0.0000	14.7064

4.0 Operational Detail - Mobile**4.1 Mitigation Measures Mobile**

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
User Defined Industrial	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
User Defined Industrial	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
User Defined Industrial	0.547192	0.045177	0.202743	0.121510	0.016147	0.006143	0.019743	0.029945	0.002479	0.002270	0.005078	0.000682	0.000891

5.0 Energy Detail

Historical Energy Use: N

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5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

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5.2 Energy by Land Use - NaturalGas**Mitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

5.3 Energy by Land Use - Electricity**Unmitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

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5.3 Energy by Land Use - Electricity**Mitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

6.0 Area Detail**6.1 Mitigation Measures Area**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.4782	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.4782	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

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6.2 Area by SubCategory**Unmitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0549					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.4233					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.4782	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0549					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.4233					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.4782	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

7.0 Water Detail

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7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

7.2 Water by Land Use**Unmitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

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7.2 Water by Land Use**Mitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

8.0 Waste Detail**8.1 Mitigation Measures Waste****Category/Year**

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

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8.2 Waste by Land Use**Unmitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Annual

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
----------------	--------	----------------	-----------------	---------------	-----------

User Defined Equipment

Equipment Type	Number
----------------	--------

11.0 Vegetation

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Summer

La Brea Subarea Wells and Transmission Main Project

Los Angeles-South Coast County, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Industrial	0.00	User Defined Unit	2.70	117,140.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	33
Climate Zone	11			Operational Year	2021
Utility Company	Los Angeles Department of Water & Power				
CO2 Intensity (lb/MWhr)	1227.89	CH4 Intensity (lb/MWhr)	0.029	N2O Intensity (lb/MWhr)	0.006

1.3 User Entered Comments & Non-Default Data

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Summer

Project Characteristics -

Land Use - assume 1 well of 660 SF each + (4 miles of new transmission main x 4 LF wide) + (8000 LF proposed rehab x 4 LF wide) = approx 117,140 SF impacted

Construction Phase - per Table 1 in Project Description

Off-road Equipment - per Table 2 Project Description

Off-road Equipment - per Table 2 of Project Description

Off-road Equipment - per Table 2 Project Description

Off-road Equipment - per Table 2 of Project Description

Demolition - 67 CY construction material (assume wood, uncompacted) => 400 lbs/CY * 67 CY = 26,800 lbs = 12 metric tons

Conversion source: CalRecycle

Trips and VMT - one well only

Well construction/equipping: 76 hauling trucks * 2 = 152 truck trips

Transmission main: 11,018 CY + 185 CY soil = 11203 CY soil / 16 CY/truck = 700 trucks or 1400 hauling truck trips.

Concrete- 10,000 SF * 1/3 LF thick = 3,333 CF * 1 CY/27 CF = 123 CY / 16 CY/truck = 7.7 trucks for vendor or less than 1 per day

Grading - 11 CY soil excavated for wells, 11,018 CY soil excavated for new transmission, 185 CY soil excavated for rehab = 11214 CY

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	220.00	174.00
tblConstructionPhase	NumDays	20.00	44.00
tblConstructionPhase	NumDays	6.00	153.00
tblConstructionPhase	NumDays	3.00	87.00
tblGrading	MaterialExported	0.00	11,214.00
tblLandUse	LandUseSquareFeet	0.00	117,140.00
tblLandUse	LotAcreage	0.00	2.70
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Summer

tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	3.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	PhaseName		Well Construction Monitoring
tblOffRoadEquipment	PhaseName		Well Construction Monitoring
tblOffRoadEquipment	PhaseName		Well Construction Monitoring
tblOffRoadEquipment	PhaseName		Well Equipping
tblOffRoadEquipment	PhaseName		Well Site Demolition and Pump-to-Waste
tblOffRoadEquipment	PhaseName		Well Site Demolition and Pump-to-Waste
tblOffRoadEquipment	PhaseName		Rehabilitation/Transmission Main Installation
tblOffRoadEquipment	PhaseName		Well Site Demolition and Pump-to-Waste
tblOffRoadEquipment	PhaseName		Rehabilitation/Transmission Main Installation
tblOffRoadEquipment	PhaseName		Well Site Demolition and Pump-to-Waste
tblOffRoadEquipment	PhaseName		Well Equipping
tblOffRoadEquipment	PhaseName		Well Construction Monitoring

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Summer

tblOffRoadEquipment	PhaseName		Well Construction Monitoring
tblOffRoadEquipment	PhaseName		Well Construction Monitoring
tblOffRoadEquipment	PhaseName		Well Construction Monitoring
tblOffRoadEquipment	PhaseName		Well Construction Monitoring
tblOffRoadEquipment	PhaseName		Well Site Demolition and Pump-to-Waste
tblOffRoadEquipment	PhaseName		Rehabilitation/Transmission Main Installation
tblOffRoadEquipment	UsageHours	6.00	8.00
tblOffRoadEquipment	UsageHours	7.00	8.00
tblTripsAndVMT	HaulingTripNumber	4.00	14.00
tblTripsAndVMT	HaulingTripNumber	0.00	1,400.00
tblTripsAndVMT	HaulingTripNumber	0.00	152.00
tblTripsAndVMT	HaulingTripNumber	0.00	152.00
tblTripsAndVMT	VendorTripNumber	19.00	1.00
tblTripsAndVMT	VendorTripNumber	0.00	3.00
tblTripsAndVMT	VendorTripNumber	0.00	3.00
tblTripsAndVMT	WorkerTripNumber	18.00	10.00
tblTripsAndVMT	WorkerTripNumber	50.00	10.00
tblTripsAndVMT	WorkerTripNumber	30.00	4.00
tblTripsAndVMT	WorkerTripNumber	5.00	4.00

2.0 Emissions Summary

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Summer

2.1 Overall Construction (Maximum Daily Emission)**Unmitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	6.1562	63.2884	49.8851	0.1067	0.6419	3.0581	3.7000	0.1609	2.8658	3.0267	0.0000	10,560.66 24	10,560.66 24	2.6460	0.0000	10,626.81 21
2020	5.6887	57.5242	49.2648	0.1066	0.4724	2.7146	3.1870	0.1193	2.5430	2.6623	0.0000	10,382.21 00	10,382.21 00	2.6338	0.0000	10,448.05 56
Maximum	6.1562	63.2884	49.8851	0.1067	0.6419	3.0581	3.7000	0.1609	2.8658	3.0267	0.0000	10,560.66 24	10,560.66 24	2.6460	0.0000	10,626.81 21

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	6.1562	63.2884	49.8851	0.1067	0.6137	3.0581	3.6718	0.1575	2.8658	3.0233	0.0000	10,560.66 24	10,560.66 24	2.6460	0.0000	10,626.81 21
2020	5.6887	57.5242	49.2648	0.1066	0.4442	2.7146	3.1588	0.1159	2.5430	2.6589	0.0000	10,382.21 00	10,382.21 00	2.6338	0.0000	10,448.05 56
Maximum	6.1562	63.2884	49.8851	0.1067	0.6137	3.0581	3.6718	0.1575	2.8658	3.0233	0.0000	10,560.66 24	10,560.66 24	2.6460	0.0000	10,626.81 21

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	5.06	0.00	0.82	2.45	0.00	0.12	0.00	0.00	0.00	0.00	0.00	0.00

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Summer

2.2 Overall Operational**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	2.6202	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	2.6202	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	2.6202	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	2.6202	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Summer

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail**Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Well Site Demolition and Pump-to-Waste	Demolition	10/1/2019	11/29/2019	5	44	
2	Rehabilitation/Transmission Main Installation	Building Construction	10/1/2019	5/29/2020	5	174	
3	Well Construction Monitoring	Site Preparation	12/2/2019	3/31/2020	5	87	
4	Well Equipping	Grading	4/1/2020	10/30/2020	5	153	

Acres of Grading (Site Preparation Phase): 0**Acres of Grading (Grading Phase): 0****Acres of Paving: 0****Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)****OffRoad Equipment**

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Summer

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Well Site Demolition and Pump-to-Waste	Crushing/Proc. Equipment	2	8.00	85	0.78
Well Site Demolition and Pump-to-Waste	Dumpers/Tenders	1	8.00	16	0.38
Well Site Demolition and Pump-to-Waste	Excavators	1	8.00	158	0.38
Well Site Demolition and Pump-to-Waste	Forklifts	1	8.00	89	0.20
Well Site Demolition and Pump-to-Waste	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Well Site Demolition and Pump-to-Waste	Trenchers	1	8.00	78	0.50
Well Construction Monitoring	Air Compressors	1	8.00	78	0.48
Well Construction Monitoring	Bore/Drill Rigs	2	8.00	221	0.50
Well Construction Monitoring	Cranes	1	8.00	231	0.29
Well Construction Monitoring	Generator Sets	1	8.00	84	0.74
Well Construction Monitoring	Off-Highway Trucks	1	8.00	402	0.38
Well Construction Monitoring	Other Construction Equipment	1	8.00	172	0.42
Well Construction Monitoring	Other Material Handling Equipment	3	8.00	168	0.40
Well Construction Monitoring	Pumps	1	8.00	84	0.74
Well Construction Monitoring	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Well Equipping	Cranes	1	8.00	231	0.29
Well Equipping	Forklifts	1	8.00	89	0.20
Rehabilitation/Transmission Main Installation	Dumpers/Tenders	1	6.00	16	0.38
Rehabilitation/Transmission Main Installation	Excavators	1	7.00	158	0.38
Rehabilitation/Transmission Main Installation	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Rehabilitation/Transmission Main Installation	Trenchers	1	8.00	78	0.50

Trips and VMT

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Summer

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Well Site Demolition and Pump-to-Waste	7	10.00	0.00	14.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Well Construction	12	4.00	3.00	152.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Well Equipping	2	4.00	3.00	152.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Rehabilitation/Transmission Main Installation	5	10.00	1.00	1,400.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Exposed Area

3.2 Well Site Demolition and Pump-to-Waste - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					5.8400e-003	0.0000	5.8400e-003	8.8000e-004	0.0000	8.8000e-004			0.0000			0.0000
Off-Road	2.3751	19.1186	18.3943	0.0280		1.2737	1.2737		1.2183	1.2183		2,693.8419	2,693.8419	0.5266		2,707.0080
Total	2.3751	19.1186	18.3943	0.0280	5.8400e-003	1.2737	1.2796	8.8000e-004	1.2183	1.2192		2,693.8419	2,693.8419	0.5266		2,707.0080

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Summer

3.2 Well Site Demolition and Pump-to-Waste - 2019**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	2.9900e-003	0.0975	0.0208	2.5000e-004	5.5600e-003	3.6000e-004	5.9200e-003	1.5200e-003	3.4000e-004	1.8700e-003		27.5072	27.5072	1.8900e-003		27.5546
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0500	0.0367	0.4822	1.2200e-003	0.1118	9.6000e-004	0.1127	0.0296	8.9000e-004	0.0305		121.2953	121.2953	4.1700e-003		121.3995
Total	0.0530	0.1342	0.5029	1.4700e-003	0.1173	1.3200e-003	0.1187	0.0312	1.2300e-003	0.0324		148.8025	148.8025	6.0600e-003		148.9540

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					2.2800e-003	0.0000	2.2800e-003	3.4000e-004	0.0000	3.4000e-004			0.0000			0.0000
Off-Road	2.3751	19.1186	18.3943	0.0280		1.2737	1.2737		1.2183	1.2183	0.0000	2,693.8419	2,693.8419	0.5266		2,707.0080
Total	2.3751	19.1186	18.3943	0.0280	2.2800e-003	1.2737	1.2760	3.4000e-004	1.2183	1.2187	0.0000	2,693.8419	2,693.8419	0.5266		2,707.0080

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Summer

3.2 Well Site Demolition and Pump-to-Waste - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	2.9900e-003	0.0975	0.0208	2.5000e-004	5.5600e-003	3.6000e-004	5.9200e-003	1.5200e-003	3.4000e-004	1.8700e-003		27.5072	27.5072	1.8900e-003		27.5546
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0500	0.0367	0.4822	1.2200e-003	0.1118	9.6000e-004	0.1127	0.0296	8.9000e-004	0.0305		121.2953	121.2953	4.1700e-003		121.3995
Total	0.0530	0.1342	0.5029	1.4700e-003	0.1173	1.3200e-003	0.1187	0.0312	1.2300e-003	0.0324		148.8025	148.8025	6.0600e-003		148.9540

3.3 Rehabilitation/Transmission Main Installation - 2019**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.1833	11.2878	10.2879	0.0147		0.7349	0.7349		0.6771	0.6771		1,441.8774	1,441.8774	0.4466		1,453.0434
Total	1.1833	11.2878	10.2879	0.0147		0.7349	0.7349		0.6771	0.6771		1,441.8774	1,441.8774	0.4466		1,453.0434

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Summer

3.3 Rehabilitation/Transmission Main Installation - 2019**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0756	2.4644	0.5254	6.4300e-003	0.3148	9.0400e-003	0.3238	0.0813	8.6500e-003	0.0899		695.5842	695.5842	0.0479		696.7818
Vendor	4.1600e-003	0.1157	0.0307	2.6000e-004	6.4000e-003	7.4000e-004	7.1400e-003	1.8400e-003	7.1000e-004	2.5500e-003		27.8815	27.8815	1.7900e-003		27.9261
Worker	0.0500	0.0367	0.4822	1.2200e-003	0.1118	9.6000e-004	0.1127	0.0296	8.9000e-004	0.0305		121.2953	121.2953	4.1700e-003		121.3995
Total	0.1297	2.6168	1.0383	7.9100e-003	0.4329	0.0107	0.4437	0.1128	0.0103	0.1230		844.7609	844.7609	0.0539		846.1074

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.1833	11.2878	10.2879	0.0147		0.7349	0.7349		0.6771	0.6771	0.0000	1,441.8774	1,441.8774	0.4466		1,453.0434
Total	1.1833	11.2878	10.2879	0.0147		0.7349	0.7349		0.6771	0.6771	0.0000	1,441.8774	1,441.8774	0.4466		1,453.0434

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Summer

3.3 Rehabilitation/Transmission Main Installation - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0756	2.4644	0.5254	6.4300e-003	0.3148	9.0400e-003	0.3238	0.0813	8.6500e-003	0.0899		695.5842	695.5842	0.0479		696.7818
Vendor	4.1600e-003	0.1157	0.0307	2.6000e-004	6.4000e-003	7.4000e-004	7.1400e-003	1.8400e-003	7.1000e-004	2.5500e-003		27.8815	27.8815	1.7900e-003		27.9261
Worker	0.0500	0.0367	0.4822	1.2200e-003	0.1118	9.6000e-004	0.1127	0.0296	8.9000e-004	0.0305		121.2953	121.2953	4.1700e-003		121.3995
Total	0.1297	2.6168	1.0383	7.9100e-003	0.4329	0.0107	0.4437	0.1128	0.0103	0.1230		844.7609	844.7609	0.0539		846.1074

3.3 Rehabilitation/Transmission Main Installation - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.1082	10.4666	10.2432	0.0147		0.6660	0.6660		0.6138	0.6138		1,411.6580	1,411.6580	0.4467		1,422.8250
Total	1.1082	10.4666	10.2432	0.0147		0.6660	0.6660		0.6138	0.6138		1,411.6580	1,411.6580	0.4467		1,422.8250

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Summer

3.3 Rehabilitation/Transmission Main Installation - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0703	2.3136	0.5127	6.3600e-003	0.2057	7.3800e-003	0.2131	0.0545	7.0600e-003	0.0616		688.6003	688.6003	0.0469		689.7721
Vendor	3.5600e-003	0.1064	0.0279	2.6000e-004	6.4000e-003	5.0000e-004	6.9000e-003	1.8400e-003	4.8000e-004	2.3200e-003		27.7025	27.7025	1.6900e-003		27.7447
Worker	0.0460	0.0327	0.4378	1.1800e-003	0.1118	9.3000e-004	0.1127	0.0296	8.6000e-004	0.0305		117.6113	117.6113	3.7100e-003		117.7040
Total	0.1199	2.4527	0.9784	7.8000e-003	0.3239	8.8100e-003	0.3327	0.0860	8.4000e-003	0.0944		833.9141	833.9141	0.0523		835.2208

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.1082	10.4666	10.2432	0.0147		0.6660	0.6660		0.6138	0.6138	0.0000	1,411.6580	1,411.6580	0.4467		1,422.8250
Total	1.1082	10.4666	10.2432	0.0147		0.6660	0.6660		0.6138	0.6138	0.0000	1,411.6580	1,411.6580	0.4467		1,422.8250

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Summer

3.3 Rehabilitation/Transmission Main Installation - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0703	2.3136	0.5127	6.3600e-003	0.2057	7.3800e-003	0.2131	0.0545	7.0600e-003	0.0616		688.6003	688.6003	0.0469		689.7721
Vendor	3.5600e-003	0.1064	0.0279	2.6000e-004	6.4000e-003	5.0000e-004	6.9000e-003	1.8400e-003	4.8000e-004	2.3200e-003		27.7025	27.7025	1.6900e-003		27.7447
Worker	0.0460	0.0327	0.4378	1.1800e-003	0.1118	9.3000e-004	0.1127	0.0296	8.6000e-004	0.0305		117.6113	117.6113	3.7100e-003		117.7040
Total	0.1199	2.4527	0.9784	7.8000e-003	0.3239	8.8100e-003	0.3327	0.0860	8.4000e-003	0.0944		833.9141	833.9141	0.0523		835.2208

3.4 Well Construction Monitoring - 2019**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0463	0.0000	0.0463	5.6300e-003	0.0000	5.6300e-003			0.0000			0.0000
Off-Road	4.7943	48.4868	38.1598	0.0815		2.3079	2.3079		2.1741	2.1741		7,990.8205	7,990.8205	2.1281		8,044.0220
Total	4.7943	48.4868	38.1598	0.0815	0.0463	2.3079	2.3542	5.6300e-003	2.1741	2.1797		7,990.8205	7,990.8205	2.1281		8,044.0220

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Summer

3.4 Well Construction Monitoring - 2019**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0164	0.5351	0.1141	1.4000e-003	0.0988	1.9600e-003	0.1008	0.0251	1.8800e-003	0.0270		151.0411	151.0411	0.0104		151.3012
Vendor	0.0125	0.3472	0.0921	7.8000e-004	0.0192	2.2100e-003	0.0214	5.5300e-003	2.1200e-003	7.6500e-003		83.6444	83.6444	5.3600e-003		83.7784
Worker	0.0200	0.0147	0.1929	4.9000e-004	0.0447	3.9000e-004	0.0451	0.0119	3.6000e-004	0.0122		48.5181	48.5181	1.6700e-003		48.5598
Total	0.0489	0.8970	0.3991	2.6700e-003	0.1627	4.5600e-003	0.1673	0.0425	4.3600e-003	0.0469		283.2036	283.2036	0.0174		283.6394

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0181	0.0000	0.0181	2.2000e-003	0.0000	2.2000e-003			0.0000			0.0000
Off-Road	4.7943	48.4868	38.1598	0.0815		2.3079	2.3079		2.1741	2.1741	0.0000	7,990.8205	7,990.8205	2.1281		8,044.0220
Total	4.7943	48.4868	38.1598	0.0815	0.0181	2.3079	2.3260	2.2000e-003	2.1741	2.1763	0.0000	7,990.8205	7,990.8205	2.1281		8,044.0220

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Summer

3.4 Well Construction Monitoring - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0164	0.5351	0.1141	1.4000e-003	0.0988	1.9600e-003	0.1008	0.0251	1.8800e-003	0.0270		151.0411	151.0411	0.0104		151.3012
Vendor	0.0125	0.3472	0.0921	7.8000e-004	0.0192	2.2100e-003	0.0214	5.5300e-003	2.1200e-003	7.6500e-003		83.6444	83.6444	5.3600e-003		83.7784
Worker	0.0200	0.0147	0.1929	4.9000e-004	0.0447	3.9000e-004	0.0451	0.0119	3.6000e-004	0.0122		48.5181	48.5181	1.6700e-003		48.5598
Total	0.0489	0.8970	0.3991	2.6700e-003	0.1627	4.5600e-003	0.1673	0.0425	4.3600e-003	0.0469		283.2036	283.2036	0.0174		283.6394

3.4 Well Construction Monitoring - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0463	0.0000	0.0463	5.6300e-003	0.0000	5.6300e-003			0.0000			0.0000
Off-Road	4.4163	43.7703	37.6732	0.0815		2.0363	2.0363		1.9175	1.9175		7,856.9614	7,856.9614	2.1181		7,909.9149
Total	4.4163	43.7703	37.6732	0.0815	0.0463	2.0363	2.0826	5.6300e-003	1.9175	1.9231		7,856.9614	7,856.9614	2.1181		7,909.9149

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Summer

3.4 Well Construction Monitoring - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0153	0.5024	0.1113	1.3800e-003	0.0384	1.6000e-003	0.0400	0.0103	1.5300e-003	0.0118		149.5246	149.5246	0.0102		149.7791
Vendor	0.0107	0.3191	0.0836	7.8000e-004	0.0192	1.5000e-003	0.0207	5.5300e-003	1.4400e-003	6.9700e-003		83.1074	83.1074	5.0700e-003		83.2342
Worker	0.0184	0.0131	0.1751	4.7000e-004	0.0447	3.7000e-004	0.0451	0.0119	3.4000e-004	0.0122		47.0445	47.0445	1.4800e-003		47.0816
Total	0.0443	0.8346	0.3701	2.6300e-003	0.1023	3.4700e-003	0.1058	0.0277	3.3100e-003	0.0310		279.6766	279.6766	0.0167		280.0949

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0181	0.0000	0.0181	2.2000e-003	0.0000	2.2000e-003			0.0000			0.0000
Off-Road	4.4163	43.7703	37.6732	0.0815		2.0363	2.0363		1.9175	1.9175	0.0000	7,856.9614	7,856.9614	2.1181		7,909.9149
Total	4.4163	43.7703	37.6732	0.0815	0.0181	2.0363	2.0544	2.2000e-003	1.9175	1.9197	0.0000	7,856.9614	7,856.9614	2.1181		7,909.9149

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3.4 Well Construction Monitoring - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0153	0.5024	0.1113	1.3800e-003	0.0384	1.6000e-003	0.0400	0.0103	1.5300e-003	0.0118		149.5246	149.5246	0.0102		149.7791
Vendor	0.0107	0.3191	0.0836	7.8000e-004	0.0192	1.5000e-003	0.0207	5.5300e-003	1.4400e-003	6.9700e-003		83.1074	83.1074	5.0700e-003		83.2342
Worker	0.0184	0.0131	0.1751	4.7000e-004	0.0447	3.7000e-004	0.0451	0.0119	3.4000e-004	0.0122		47.0445	47.0445	1.4800e-003		47.0816
Total	0.0443	0.8346	0.3701	2.6300e-003	0.1023	3.4700e-003	0.1058	0.0277	3.3100e-003	0.0310		279.6766	279.6766	0.0167		280.0949

3.5 Well Equipping - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Off-Road	0.5974	6.6890	3.2956	7.2900e-003		0.3189	0.3189		0.2934	0.2934		706.8205	706.8205	0.2286		712.5355
Total	0.5974	6.6890	3.2956	7.2900e-003	0.0000	0.3189	0.3189	0.0000	0.2934	0.2934		706.8205	706.8205	0.2286		712.5355

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Summer

3.5 Well Equipping - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	8.6800e-003	0.2857	0.0633	7.8000e-004	0.0174	9.1000e-004	0.0183	4.7600e-003	8.7000e-004	5.6300e-003		85.0238	85.0238	5.7900e-003		85.1685
Vendor	0.0107	0.3191	0.0836	7.8000e-004	0.0192	1.5000e-003	0.0207	5.5300e-003	1.4400e-003	6.9700e-003		83.1074	83.1074	5.0700e-003		83.2342
Worker	0.0184	0.0131	0.1751	4.7000e-004	0.0447	3.7000e-004	0.0451	0.0119	3.4000e-004	0.0122		47.0445	47.0445	1.4800e-003		47.0816
Total	0.0378	0.6179	0.3221	2.0300e-003	0.0813	2.7800e-003	0.0841	0.0222	2.6500e-003	0.0248		215.1757	215.1757	0.0123		215.4843

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Off-Road	0.5974	6.6890	3.2956	7.2900e-003		0.3189	0.3189		0.2934	0.2934	0.0000	706.8205	706.8205	0.2286		712.5355
Total	0.5974	6.6890	3.2956	7.2900e-003	0.0000	0.3189	0.3189	0.0000	0.2934	0.2934	0.0000	706.8205	706.8205	0.2286		712.5355

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Summer

3.5 Well Equipping - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	8.6800e-003	0.2857	0.0633	7.8000e-004	0.0174	9.1000e-004	0.0183	4.7600e-003	8.7000e-004	5.6300e-003		85.0238	85.0238	5.7900e-003		85.1685
Vendor	0.0107	0.3191	0.0836	7.8000e-004	0.0192	1.5000e-003	0.0207	5.5300e-003	1.4400e-003	6.9700e-003		83.1074	83.1074	5.0700e-003		83.2342
Worker	0.0184	0.0131	0.1751	4.7000e-004	0.0447	3.7000e-004	0.0451	0.0119	3.4000e-004	0.0122		47.0445	47.0445	1.4800e-003		47.0816
Total	0.0378	0.6179	0.3221	2.0300e-003	0.0813	2.7800e-003	0.0841	0.0222	2.6500e-003	0.0248		215.1757	215.1757	0.0123		215.4843

4.0 Operational Detail - Mobile**4.1 Mitigation Measures Mobile**

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Summer

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
User Defined Industrial	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
User Defined Industrial	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
User Defined Industrial	0.547192	0.045177	0.202743	0.121510	0.016147	0.006143	0.019743	0.029945	0.002479	0.002270	0.005078	0.000682	0.000891

5.0 Energy Detail

Historical Energy Use: N

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Summer

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

5.2 Energy by Land Use - NaturalGas**Unmitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Summer

5.2 Energy by Land Use - NaturalGas**Mitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

6.0 Area Detail**6.1 Mitigation Measures Area**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	2.6202	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Unmitigated	2.6202	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Summer

6.2 Area by SubCategory**Unmitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.3009					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	2.3194					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	2.6202	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.3009					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	2.3194					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	2.6202	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000

7.0 Water Detail

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Summer

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment**Fire Pumps and Emergency Generators**

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
----------------	--------	-----------	------------	-------------	-------------	-----------

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
----------------	--------	----------------	-----------------	---------------	-----------

User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Winter

La Brea Subarea Wells and Transmission Main Project

Los Angeles-South Coast County, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Industrial	0.00	User Defined Unit	2.70	117,140.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	33
Climate Zone	11			Operational Year	2021
Utility Company	Los Angeles Department of Water & Power				
CO2 Intensity (lb/MWhr)	1227.89	CH4 Intensity (lb/MWhr)	0.029	N2O Intensity (lb/MWhr)	0.006

1.3 User Entered Comments & Non-Default Data

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Winter

Project Characteristics -

Land Use - assume 1 well of 660 SF each + (4 miles of new transmission main x 4 LF wide) + (8000 LF proposed rehab x 4 LF wide) = approx 117,140 SF impacted

Construction Phase - per Table 1 in Project Description

Off-road Equipment - per Table 2 Project Description

Off-road Equipment - per Table 2 of Project Description

Off-road Equipment - per Table 2 Project Description

Off-road Equipment - per Table 2 of Project Description

Demolition - 67 CY construction material (assume wood, uncompacted) => 400 lbs/CY * 67 CY = 26,800 lbs = 12 metric tons

Conversion source: CalRecycle

Trips and VMT - one well only

Well construction/equipping: 76 hauling trucks * 2 = 152 truck trips

Transmission main: 11,018 CY + 185 CY soil = 11203 CY soil / 16 CY/truck = 700 trucks or 1400 hauling truck trips.

Concrete- 10,000 SF * 1/3 LF thick = 3,333 CF * 1 CY/27 CF = 123 CY / 16 CY/truck = 7.7 trucks for vendor or less than 1 per day

Grading - 11 CY soil excavated for wells, 11,018 CY soil excavated for new transmission, 185 CY soil excavated for rehab = 11214 CY

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	220.00	174.00
tblConstructionPhase	NumDays	20.00	44.00
tblConstructionPhase	NumDays	6.00	153.00
tblConstructionPhase	NumDays	3.00	87.00
tblGrading	MaterialExported	0.00	11,214.00
tblLandUse	LandUseSquareFeet	0.00	117,140.00
tblLandUse	LotAcreage	0.00	2.70
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Winter

tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
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tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	3.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	PhaseName		Well Construction Monitoring
tblOffRoadEquipment	PhaseName		Well Construction Monitoring
tblOffRoadEquipment	PhaseName		Well Construction Monitoring
tblOffRoadEquipment	PhaseName		Well Equipping
tblOffRoadEquipment	PhaseName		Well Site Demolition and Pump-to-Waste
tblOffRoadEquipment	PhaseName		Well Site Demolition and Pump-to-Waste
tblOffRoadEquipment	PhaseName		Rehabilitation/Transmission Main Installation
tblOffRoadEquipment	PhaseName		Well Site Demolition and Pump-to-Waste
tblOffRoadEquipment	PhaseName		Rehabilitation/Transmission Main Installation
tblOffRoadEquipment	PhaseName		Well Site Demolition and Pump-to-Waste
tblOffRoadEquipment	PhaseName		Well Equipping
tblOffRoadEquipment	PhaseName		Well Construction Monitoring

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Winter

tblOffRoadEquipment	PhaseName		Well Construction Monitoring
tblOffRoadEquipment	PhaseName		Well Construction Monitoring
tblOffRoadEquipment	PhaseName		Well Construction Monitoring
tblOffRoadEquipment	PhaseName		Well Construction Monitoring
tblOffRoadEquipment	PhaseName		Well Site Demolition and Pump-to-Waste
tblOffRoadEquipment	PhaseName		Rehabilitation/Transmission Main Installation
tblOffRoadEquipment	UsageHours	6.00	8.00
tblOffRoadEquipment	UsageHours	7.00	8.00
tblTripsAndVMT	HaulingTripNumber	4.00	14.00
tblTripsAndVMT	HaulingTripNumber	0.00	1,400.00
tblTripsAndVMT	HaulingTripNumber	0.00	152.00
tblTripsAndVMT	HaulingTripNumber	0.00	152.00
tblTripsAndVMT	VendorTripNumber	19.00	1.00
tblTripsAndVMT	VendorTripNumber	0.00	3.00
tblTripsAndVMT	VendorTripNumber	0.00	3.00
tblTripsAndVMT	WorkerTripNumber	18.00	10.00
tblTripsAndVMT	WorkerTripNumber	50.00	10.00
tblTripsAndVMT	WorkerTripNumber	30.00	4.00
tblTripsAndVMT	WorkerTripNumber	5.00	4.00

2.0 Emissions Summary

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Winter

2.1 Overall Construction (Maximum Daily Emission)**Unmitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	6.1667	63.3345	49.8853	0.1064	0.6419	3.0583	3.7002	0.1609	2.8661	3.0270	0.0000	10,533.3736	10,533.3736	2.6484	0.0000	10,599.5824
2020	5.6985	57.5654	49.2639	0.1064	0.4724	2.7148	3.1872	0.1193	2.5432	2.6625	0.0000	10,355.1300	10,355.1300	2.6360	0.0000	10,421.0309
Maximum	6.1667	63.3345	49.8853	0.1064	0.6419	3.0583	3.7002	0.1609	2.8661	3.0270	0.0000	10,533.3736	10,533.3736	2.6484	0.0000	10,599.5824

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	6.1667	63.3345	49.8853	0.1064	0.6137	3.0583	3.6720	0.1575	2.8661	3.0236	0.0000	10,533.3736	10,533.3736	2.6484	0.0000	10,599.5824
2020	5.6985	57.5654	49.2639	0.1064	0.4442	2.7148	3.1590	0.1159	2.5432	2.6591	0.0000	10,355.1300	10,355.1300	2.6360	0.0000	10,421.0309
Maximum	6.1667	63.3345	49.8853	0.1064	0.6137	3.0583	3.6720	0.1575	2.8661	3.0236	0.0000	10,533.3736	10,533.3736	2.6484	0.0000	10,599.5824

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	5.06	0.00	0.82	2.45	0.00	0.12	0.00	0.00	0.00	0.00	0.00	0.00

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Winter

2.2 Overall Operational**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	2.6202	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	2.6202	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	2.6202	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	2.6202	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Well Site Demolition and Pump-to-Waste	Demolition	10/1/2019	11/29/2019	5	44	
2	Rehabilitation/Transmission Main Installation	Building Construction	10/1/2019	5/29/2020	5	174	
3	Well Construction Monitoring	Site Preparation	12/2/2019	3/31/2020	5	87	
4	Well Equipping	Grading	4/1/2020	10/30/2020	5	153	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Winter

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Well Site Demolition and Pump-to-Waste	Crushing/Proc. Equipment	2	8.00	85	0.78
Well Site Demolition and Pump-to-Waste	Dumpers/Tenders	1	8.00	16	0.38
Well Site Demolition and Pump-to-Waste	Excavators	1	8.00	158	0.38
Well Site Demolition and Pump-to-Waste	Forklifts	1	8.00	89	0.20
Well Site Demolition and Pump-to-Waste	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Well Site Demolition and Pump-to-Waste	Trenchers	1	8.00	78	0.50
Well Construction Monitoring	Air Compressors	1	8.00	78	0.48
Well Construction Monitoring	Bore/Drill Rigs	2	8.00	221	0.50
Well Construction Monitoring	Cranes	1	8.00	231	0.29
Well Construction Monitoring	Generator Sets	1	8.00	84	0.74
Well Construction Monitoring	Off-Highway Trucks	1	8.00	402	0.38
Well Construction Monitoring	Other Construction Equipment	1	8.00	172	0.42
Well Construction Monitoring	Other Material Handling Equipment	3	8.00	168	0.40
Well Construction Monitoring	Pumps	1	8.00	84	0.74
Well Construction Monitoring	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Well Equipping	Cranes	1	8.00	231	0.29
Well Equipping	Forklifts	1	8.00	89	0.20
Rehabilitation/Transmission Main Installation	Dumpers/Tenders	1	6.00	16	0.38
Rehabilitation/Transmission Main Installation	Excavators	1	7.00	158	0.38
Rehabilitation/Transmission Main Installation	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Rehabilitation/Transmission Main Installation	Trenchers	1	8.00	78	0.50

Trips and VMT

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Winter

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Well Site Demolition and Pump-to-Waste	7	10.00	0.00	14.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Well Construction	12	4.00	3.00	152.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Well Equipping	2	4.00	3.00	152.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Rehabilitation/Transmission Main Installation	5	10.00	1.00	1,400.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Exposed Area

3.2 Well Site Demolition and Pump-to-Waste - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					5.8400e-003	0.0000	5.8400e-003	8.8000e-004	0.0000	8.8000e-004			0.0000			0.0000
Off-Road	2.3751	19.1186	18.3943	0.0280		1.2737	1.2737		1.2183	1.2183		2,693.8419	2,693.8419	0.5266		2,707.0080
Total	2.3751	19.1186	18.3943	0.0280	5.8400e-003	1.2737	1.2796	8.8000e-004	1.2183	1.2192		2,693.8419	2,693.8419	0.5266		2,707.0080

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Winter

3.2 Well Site Demolition and Pump-to-Waste - 2019**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	3.0600e-003	0.0988	0.0222	2.5000e-004	5.5600e-003	3.6000e-004	5.9300e-003	1.5200e-003	3.5000e-004	1.8700e-003		27.0407	27.0407	1.9700e-003		27.0898
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0554	0.0407	0.4425	1.1500e-003	0.1118	9.6000e-004	0.1127	0.0296	8.9000e-004	0.0305		114.2131	114.2131	3.9300e-003		114.3113
Total	0.0584	0.1394	0.4647	1.4000e-003	0.1173	1.3200e-003	0.1187	0.0312	1.2400e-003	0.0324		141.2538	141.2538	5.9000e-003		141.4012

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					2.2800e-003	0.0000	2.2800e-003	3.4000e-004	0.0000	3.4000e-004			0.0000			0.0000
Off-Road	2.3751	19.1186	18.3943	0.0280		1.2737	1.2737		1.2183	1.2183	0.0000	2,693.8419	2,693.8419	0.5266		2,707.0080
Total	2.3751	19.1186	18.3943	0.0280	2.2800e-003	1.2737	1.2760	3.4000e-004	1.2183	1.2187	0.0000	2,693.8419	2,693.8419	0.5266		2,707.0080

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Winter

3.2 Well Site Demolition and Pump-to-Waste - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	3.0600e-003	0.0988	0.0222	2.5000e-004	5.5600e-003	3.6000e-004	5.9300e-003	1.5200e-003	3.5000e-004	1.8700e-003		27.0407	27.0407	1.9700e-003		27.0898
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0554	0.0407	0.4425	1.1500e-003	0.1118	9.6000e-004	0.1127	0.0296	8.9000e-004	0.0305		114.2131	114.2131	3.9300e-003		114.3113
Total	0.0584	0.1394	0.4647	1.4000e-003	0.1173	1.3200e-003	0.1187	0.0312	1.2400e-003	0.0324		141.2538	141.2538	5.9000e-003		141.4012

3.3 Rehabilitation/Transmission Main Installation - 2019**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.1833	11.2878	10.2879	0.0147		0.7349	0.7349		0.6771	0.6771		1,441.8774	1,441.8774	0.4466		1,453.0434
Total	1.1833	11.2878	10.2879	0.0147		0.7349	0.7349		0.6771	0.6771		1,441.8774	1,441.8774	0.4466		1,453.0434

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Winter

3.3 Rehabilitation/Transmission Main Installation - 2019**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0775	2.4972	0.5609	6.3200e-003	0.3148	9.2100e-003	0.3240	0.0813	8.8100e-003	0.0901		683.7871	683.7871	0.0497		685.0303
Vendor	4.3300e-003	0.1159	0.0339	2.5000e-004	6.4000e-003	7.5000e-004	7.1500e-003	1.8400e-003	7.2000e-004	2.5600e-003		27.1277	27.1277	1.9100e-003		27.1754
Worker	0.0554	0.0407	0.4425	1.1500e-003	0.1118	9.6000e-004	0.1127	0.0296	8.9000e-004	0.0305		114.2131	114.2131	3.9300e-003		114.3113
Total	0.1372	2.6538	1.0373	7.7200e-003	0.4329	0.0109	0.4439	0.1128	0.0104	0.1232		825.1279	825.1279	0.0556		826.5170

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.1833	11.2878	10.2879	0.0147		0.7349	0.7349		0.6771	0.6771	0.0000	1,441.8774	1,441.8774	0.4466		1,453.0434
Total	1.1833	11.2878	10.2879	0.0147		0.7349	0.7349		0.6771	0.6771	0.0000	1,441.8774	1,441.8774	0.4466		1,453.0434

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Winter

3.3 Rehabilitation/Transmission Main Installation - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0775	2.4972	0.5609	6.3200e-003	0.3148	9.2100e-003	0.3240	0.0813	8.8100e-003	0.0901		683.7871	683.7871	0.0497		685.0303
Vendor	4.3300e-003	0.1159	0.0339	2.5000e-004	6.4000e-003	7.5000e-004	7.1500e-003	1.8400e-003	7.2000e-004	2.5600e-003		27.1277	27.1277	1.9100e-003		27.1754
Worker	0.0554	0.0407	0.4425	1.1500e-003	0.1118	9.6000e-004	0.1127	0.0296	8.9000e-004	0.0305		114.2131	114.2131	3.9300e-003		114.3113
Total	0.1372	2.6538	1.0373	7.7200e-003	0.4329	0.0109	0.4439	0.1128	0.0104	0.1232		825.1279	825.1279	0.0556		826.5170

3.3 Rehabilitation/Transmission Main Installation - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.1082	10.4666	10.2432	0.0147		0.6660	0.6660		0.6138	0.6138		1,411.6580	1,411.6580	0.4467		1,422.8250
Total	1.1082	10.4666	10.2432	0.0147		0.6660	0.6660		0.6138	0.6138		1,411.6580	1,411.6580	0.4467		1,422.8250

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Winter

3.3 Rehabilitation/Transmission Main Installation - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0720	2.3435	0.5448	6.2500e-003	0.2057	7.5000e-003	0.2132	0.0545	7.1700e-003	0.0617		676.7424	676.7424	0.0486		677.9567
Vendor	3.7200e-003	0.1064	0.0307	2.5000e-004	6.4000e-003	5.1000e-004	6.9100e-003	1.8400e-003	4.9000e-004	2.3300e-003		26.9449	26.9449	1.8000e-003		26.9900
Worker	0.0511	0.0363	0.4010	1.1100e-003	0.1118	9.3000e-004	0.1127	0.0296	8.6000e-004	0.0305		110.7420	110.7420	3.4900e-003		110.8293
Total	0.1268	2.4861	0.9766	7.6100e-003	0.3239	8.9400e-003	0.3328	0.0860	8.5200e-003	0.0945		814.4293	814.4293	0.0539		815.7760

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.1082	10.4666	10.2432	0.0147		0.6660	0.6660		0.6138	0.6138	0.0000	1,411.6580	1,411.6580	0.4467		1,422.8250
Total	1.1082	10.4666	10.2432	0.0147		0.6660	0.6660		0.6138	0.6138	0.0000	1,411.6580	1,411.6580	0.4467		1,422.8250

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Winter

3.3 Rehabilitation/Transmission Main Installation - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0720	2.3435	0.5448	6.2500e-003	0.2057	7.5000e-003	0.2132	0.0545	7.1700e-003	0.0617		676.7424	676.7424	0.0486		677.9567
Vendor	3.7200e-003	0.1064	0.0307	2.5000e-004	6.4000e-003	5.1000e-004	6.9100e-003	1.8400e-003	4.9000e-004	2.3300e-003		26.9449	26.9449	1.8000e-003		26.9900
Worker	0.0511	0.0363	0.4010	1.1100e-003	0.1118	9.3000e-004	0.1127	0.0296	8.6000e-004	0.0305		110.7420	110.7420	3.4900e-003		110.8293
Total	0.1268	2.4861	0.9766	7.6100e-003	0.3239	8.9400e-003	0.3328	0.0860	8.5200e-003	0.0945		814.4293	814.4293	0.0539		815.7760

3.4 Well Construction Monitoring - 2019**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0463	0.0000	0.0463	5.6300e-003	0.0000	5.6300e-003			0.0000			0.0000
Off-Road	4.7943	48.4868	38.1598	0.0815		2.3079	2.3079		2.1741	2.1741		7,990.8205	7,990.8205	2.1281		8,044.0220
Total	4.7943	48.4868	38.1598	0.0815	0.0463	2.3079	2.3542	5.6300e-003	2.1741	2.1797		7,990.8205	7,990.8205	2.1281		8,044.0220

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Winter

3.4 Well Construction Monitoring - 2019**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0168	0.5423	0.1218	1.3700e-003	0.0988	2.0000e-003	0.1008	0.0251	1.9100e-003	0.0270		148.4795	148.4795	0.0108		148.7495
Vendor	0.0130	0.3477	0.1015	7.6000e-004	0.0192	2.2500e-003	0.0215	5.5300e-003	2.1500e-003	7.6800e-003		81.3831	81.3831	5.7200e-003		81.5261
Worker	0.0222	0.0163	0.1770	4.6000e-004	0.0447	3.9000e-004	0.0451	0.0119	3.6000e-004	0.0122		45.6852	45.6852	1.5700e-003		45.7245
Total	0.0520	0.9062	0.4003	2.5900e-003	0.1627	4.6400e-003	0.1674	0.0425	4.4200e-003	0.0469		275.5478	275.5478	0.0181		276.0000

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0181	0.0000	0.0181	2.2000e-003	0.0000	2.2000e-003			0.0000			0.0000
Off-Road	4.7943	48.4868	38.1598	0.0815		2.3079	2.3079		2.1741	2.1741	0.0000	7,990.8205	7,990.8205	2.1281		8,044.0220
Total	4.7943	48.4868	38.1598	0.0815	0.0181	2.3079	2.3260	2.2000e-003	2.1741	2.1763	0.0000	7,990.8205	7,990.8205	2.1281		8,044.0220

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Winter

3.4 Well Construction Monitoring - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0168	0.5423	0.1218	1.3700e-003	0.0988	2.0000e-003	0.1008	0.0251	1.9100e-003	0.0270		148.4795	148.4795	0.0108		148.7495
Vendor	0.0130	0.3477	0.1015	7.6000e-004	0.0192	2.2500e-003	0.0215	5.5300e-003	2.1500e-003	7.6800e-003		81.3831	81.3831	5.7200e-003		81.5261
Worker	0.0222	0.0163	0.1770	4.6000e-004	0.0447	3.9000e-004	0.0451	0.0119	3.6000e-004	0.0122		45.6852	45.6852	1.5700e-003		45.7245
Total	0.0520	0.9062	0.4003	2.5900e-003	0.1627	4.6400e-003	0.1674	0.0425	4.4200e-003	0.0469		275.5478	275.5478	0.0181		276.0000

3.4 Well Construction Monitoring - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0463	0.0000	0.0463	5.6300e-003	0.0000	5.6300e-003			0.0000			0.0000
Off-Road	4.4163	43.7703	37.6732	0.0815		2.0363	2.0363		1.9175	1.9175		7,856.9614	7,856.9614	2.1181		7,909.9149
Total	4.4163	43.7703	37.6732	0.0815	0.0463	2.0363	2.0826	5.6300e-003	1.9175	1.9231		7,856.9614	7,856.9614	2.1181		7,909.9149

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Winter

3.4 Well Construction Monitoring - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0156	0.5089	0.1183	1.3600e-003	0.0384	1.6300e-003	0.0400	0.0103	1.5600e-003	0.0119		146.9498	146.9498	0.0106		147.2135
Vendor	0.0112	0.3191	0.0922	7.6000e-004	0.0192	1.5300e-003	0.0207	5.5300e-003	1.4600e-003	6.9900e-003		80.8347	80.8347	5.4100e-003		80.9699
Worker	0.0204	0.0145	0.1604	4.4000e-004	0.0447	3.7000e-004	0.0451	0.0119	3.4000e-004	0.0122		44.2968	44.2968	1.4000e-003		44.3317
Total	0.0472	0.8424	0.3709	2.5600e-003	0.1023	3.5300e-003	0.1058	0.0277	3.3600e-003	0.0310		272.0813	272.0813	0.0174		272.5150

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0181	0.0000	0.0181	2.2000e-003	0.0000	2.2000e-003			0.0000			0.0000
Off-Road	4.4163	43.7703	37.6732	0.0815		2.0363	2.0363		1.9175	1.9175	0.0000	7,856.9614	7,856.9614	2.1181		7,909.9149
Total	4.4163	43.7703	37.6732	0.0815	0.0181	2.0363	2.0544	2.2000e-003	1.9175	1.9197	0.0000	7,856.9614	7,856.9614	2.1181		7,909.9149

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Winter

3.4 Well Construction Monitoring - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0156	0.5089	0.1183	1.3600e-003	0.0384	1.6300e-003	0.0400	0.0103	1.5600e-003	0.0119		146.9498	146.9498	0.0106		147.2135
Vendor	0.0112	0.3191	0.0922	7.6000e-004	0.0192	1.5300e-003	0.0207	5.5300e-003	1.4600e-003	6.9900e-003		80.8347	80.8347	5.4100e-003		80.9699
Worker	0.0204	0.0145	0.1604	4.4000e-004	0.0447	3.7000e-004	0.0451	0.0119	3.4000e-004	0.0122		44.2968	44.2968	1.4000e-003		44.3317
Total	0.0472	0.8424	0.3709	2.5600e-003	0.1023	3.5300e-003	0.1058	0.0277	3.3600e-003	0.0310		272.0813	272.0813	0.0174		272.5150

3.5 Well Equipping - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Off-Road	0.5974	6.6890	3.2956	7.2900e-003		0.3189	0.3189		0.2934	0.2934		706.8205	706.8205	0.2286		712.5355
Total	0.5974	6.6890	3.2956	7.2900e-003	0.0000	0.3189	0.3189	0.0000	0.2934	0.2934		706.8205	706.8205	0.2286		712.5355

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Winter

3.5 Well Equipping - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	8.8900e-003	0.2894	0.0673	7.7000e-004	0.0174	9.3000e-004	0.0183	4.7600e-003	8.9000e-004	5.6500e-003		83.5597	83.5597	6.0000e-003		83.7096
Vendor	0.0112	0.3191	0.0922	7.6000e-004	0.0192	1.5300e-003	0.0207	5.5300e-003	1.4600e-003	6.9900e-003		80.8347	80.8347	5.4100e-003		80.9699
Worker	0.0204	0.0145	0.1604	4.4000e-004	0.0447	3.7000e-004	0.0451	0.0119	3.4000e-004	0.0122		44.2968	44.2968	1.4000e-003		44.3317
Total	0.0405	0.6229	0.3199	1.9700e-003	0.0813	2.8300e-003	0.0841	0.0222	2.6900e-003	0.0248		208.6912	208.6912	0.0128		209.0112

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Off-Road	0.5974	6.6890	3.2956	7.2900e-003		0.3189	0.3189		0.2934	0.2934	0.0000	706.8205	706.8205	0.2286		712.5355
Total	0.5974	6.6890	3.2956	7.2900e-003	0.0000	0.3189	0.3189	0.0000	0.2934	0.2934	0.0000	706.8205	706.8205	0.2286		712.5355

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Winter

3.5 Well Equipping - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	8.8900e-003	0.2894	0.0673	7.7000e-004	0.0174	9.3000e-004	0.0183	4.7600e-003	8.9000e-004	5.6500e-003		83.5597	83.5597	6.0000e-003		83.7096
Vendor	0.0112	0.3191	0.0922	7.6000e-004	0.0192	1.5300e-003	0.0207	5.5300e-003	1.4600e-003	6.9900e-003		80.8347	80.8347	5.4100e-003		80.9699
Worker	0.0204	0.0145	0.1604	4.4000e-004	0.0447	3.7000e-004	0.0451	0.0119	3.4000e-004	0.0122		44.2968	44.2968	1.4000e-003		44.3317
Total	0.0405	0.6229	0.3199	1.9700e-003	0.0813	2.8300e-003	0.0841	0.0222	2.6900e-003	0.0248		208.6912	208.6912	0.0128		209.0112

4.0 Operational Detail - Mobile**4.1 Mitigation Measures Mobile**

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
User Defined Industrial	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
User Defined Industrial	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
User Defined Industrial	0.547192	0.045177	0.202743	0.121510	0.016147	0.006143	0.019743	0.029945	0.002479	0.002270	0.005078	0.000682	0.000891

5.0 Energy Detail

Historical Energy Use: N

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Winter

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

5.2 Energy by Land Use - NaturalGas**Unmitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Winter

5.2 Energy by Land Use - NaturalGas**Mitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

6.0 Area Detail**6.1 Mitigation Measures Area**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	2.6202	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Unmitigated	2.6202	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Winter

6.2 Area by SubCategory**Unmitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.3009					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	2.3194					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	2.6202	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.3009					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	2.3194					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	2.6202	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000

7.0 Water Detail

La Brea Subarea Wells and Transmission Main Project - Los Angeles-South Coast County, Winter

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment**Fire Pumps and Emergency Generators**

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

Beverly Hills MNDGHG Summary - Construction Emissions

Phase	MT/year CO ₂ e				MT CO ₂ e
	Onsite	Hauling	Vendor	Worker	Total
Well Site Demolition and Pump-to-Waste -2019	54	1	0	2	57
Well Construction Monitoring -2019	80	2	1	0	83
Well Construction Monitoring -2020	233	4	2	1	241
Well Equipping - 2020	49	6	6	3	64
Rehabilitation/ Transmission Main Installation - 2019	44	21	1	3	69
Rehabilitation/ Transmission Main Installation - 2020	70	34	1	6	110
Annual Total (2019)	178	23	2	6	208
Annual Total (2020)	352	44	9	10	416
Project Total	530	67	11	16	624
Amortized Emissions (MT CO ₂ e/year)					21

GHG Summary - Operational Emissions

Electricity use	725,089 kWh/year total - 1 well operating daily
Electricity converted to GHG Emissions ¹	513 MTCO ₂ e/year

¹ <https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator>

Beverly Hills MNDEnergy Summary - Construction

Fuel Conversion

Source type	Total MTCO2e/year	Fuel Type	Factor KGCO2/gal	Gallons
Onsite	530	diesel	10.16	52,182
Hauling	67	diesel	10.16	6,551
Vendor	9	diesel	10.16	932
Worker	16	gasoline	8.89	1,827

Total Diesel (gal)	59,665
Total Gas (gal)	1,827

Energy Summary - OperationMobile Sources

No substantial increase compared to existing maintenance routine

Area, water, waste emissions

None

Energy Use

Electricity 725,089 kWh/year total - 1 well operating daily

150 hp pump
 0.74 load factor
 24 hr per day operation
 0.7457 kW/hp-h
 2664 hp-h per day
 1987 kW hr per day
 725,089 kwh/year per pump

LADWP Total- 2020 Energy and Demand Forecast²

22,492,000,000 kWh/year
 22492 GWh/year

Percentage of Project to LADWP Forecast

0.003%

²http://rates.ladwp.com/Admin/Uploads/Load%20Forecast/2017/10/2017%20Retails%20Sales%20Forecast_Final.pdf

Appendix B

Biological Resources Data



Selected Elements by Scientific Name

California Department of Fish and Wildlife
California Natural Diversity Database

Query Criteria: Quad< IS (Beverly Hills (3411814) OR Hollywood (3411813) OR Topanga (3411815) OR Venice (3311884) OR Inglewood (3311883) OR Van Nuys (3411824) OR Burbank (3411823) OR Canoga Park (3411825))

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
<i>Agelaius tricolor</i> tricolored blackbird	ABPBXB0020	None	Threatened	G2G3	S1S2	SSC
<i>Aglaothorax longipennis</i> Santa Monica shieldback katydid	IIORT32020	None	None	G1G2	S1S2	
<i>Aimophila ruficeps canescens</i> southern California rufous-crowned sparrow	ABPBX91091	None	None	G5T3	S3	WL
<i>Anaxyrus californicus</i> arroyo toad	AAABB01230	Endangered	None	G2G3	S2S3	SSC
<i>Anniella sp.</i> California legless lizard	ARACC01070	None	None	G3G4	S3S4	SSC
<i>Anniella stebbinsi</i> southern California legless lizard	ARACC01060	None	None	G3	S3	SSC
<i>Antrozous pallidus</i> pallid bat	AMACC10010	None	None	G5	S3	SSC
<i>Arenaria paludicola</i> marsh sandwort	PDCAR040L0	Endangered	Endangered	G1	S1	1B.1
<i>Arizona elegans occidentalis</i> California glossy snake	ARADB01017	None	None	G5T2	S2	SSC
<i>Aspidoscelis tigris stejnegeri</i> coastal whiptail	ARACJ02143	None	None	G5T5	S3	SSC
<i>Astragalus brauntonii</i> Braunton's milk-vetch	PDFAB0F1G0	Endangered	None	G2	S2	1B.1
<i>Astragalus pycnostachyus var. lanosissimus</i> Ventura Marsh milk-vetch	PDFAB0F7B1	Endangered	Endangered	G2T1	S1	1B.1
<i>Astragalus tener var. titi</i> coastal dunes milk-vetch	PDFAB0F8R2	Endangered	Endangered	G2T1	S1	1B.1
<i>Athene cunicularia</i> burrowing owl	ABNSB10010	None	None	G4	S3	SSC
<i>Atriplex coulteri</i> Coulter's saltbush	PDCHE040E0	None	None	G3	S1S2	1B.2
<i>Atriplex pacifica</i> south coast saltscale	PDCHE041C0	None	None	G4	S2	1B.2
<i>Atriplex parishii</i> Parish's brittlescale	PDCHE041D0	None	None	G1G2	S1	1B.1
<i>Atriplex serenana var. davidsonii</i> Davidson's saltscale	PDCHE041T1	None	None	G5T1	S1	1B.2
<i>Berberis nevii</i> Nevin's barberry	PDBER060A0	Endangered	Endangered	G1	S1	1B.1



Selected Elements by Scientific Name

California Department of Fish and Wildlife
California Natural Diversity Database

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
<i>Bombus crotchii</i> Crotch bumble bee	IIHYM24480	None	None	G3G4	S1S2	
<i>Brennania belkini</i> Belkin's dune tabanid fly	IIDIP17010	None	None	G1G2	S1S2	
<i>Buteo swainsoni</i> Swainson's hawk	ABNKC19070	None	Threatened	G5	S3	
<i>California Walnut Woodland</i> California Walnut Woodland	CTT71210CA	None	None	G2	S2.1	
<i>Calochortus clavatus var. gracilis</i> slender mariposa-lily	PMLIL0D096	None	None	G4T2T3	S2S3	1B.2
<i>Calochortus plummerae</i> Plummer's mariposa-lily	PMLIL0D150	None	None	G4	S4	4.2
<i>Calystegia felix</i> lucky morning-glory	PDCON040P0	None	None	G1Q	S1	1B.1
<i>Carolella busckana</i> Busck's gallmoth	IILEM2X090	None	None	G1G3	SH	
<i>Centromadia parryi ssp. australis</i> southern tarplant	PDAST4R0P4	None	None	G3T2	S2	1B.1
<i>Chaenactis glabriuscula var. orcuttiana</i> Orcutt's pincushion	PDAST20095	None	None	G5T1T2	S1	1B.1
<i>Charadrius alexandrinus nivosus</i> western snowy plover	ABNNB03031	Threatened	None	G3T3	S2S3	SSC
<i>Chenopodium littoreum</i> coastal goosefoot	PDCHE091Z0	None	None	G1	S1	1B.2
<i>Chloropyron maritimum ssp. maritimum</i> salt marsh bird's-beak	PDSCR0J0C2	Endangered	Endangered	G4?T1	S1	1B.2
<i>Chorizanthe parryi var. fernandina</i> San Fernando Valley spineflower	PDPGN040J1	Proposed Threatened	Endangered	G2T1	S1	1B.1
<i>Cicindela hirticollis gravida</i> sandy beach tiger beetle	IICOL02101	None	None	G5T2	S2	
<i>Cicindela senilis frosti</i> senile tiger beetle	IICOL02121	None	None	G2G3T1T3	S1	
<i>Coelus globosus</i> globose dune beetle	IICOL4A010	None	None	G1G2	S1S2	
<i>Coturnicops noveboracensis</i> yellow rail	ABNME01010	None	None	G4	S1S2	SSC
<i>Danaus plexippus pop. 1</i> monarch - California overwintering population	IILEPP2012	None	None	G4T2T3	S2S3	
<i>Deinandra minthornii</i> Santa Susana tarplant	PDAST4R0J0	None	Rare	G2	S2	1B.2
<i>Diadophis punctatus modestus</i> San Bernardino ringneck snake	ARADB10015	None	None	G5T2T3	S2?	



Selected Elements by Scientific Name

California Department of Fish and Wildlife
California Natural Diversity Database

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
<i>Dithyrea maritima</i> beach spectaclepod	PDBRA10020	None	Threatened	G1	S1	1B.1
<i>Dodecahema leptoceras</i> slender-horned spineflower	PDPGN0V010	Endangered	Endangered	G1	S1	1B.1
<i>Dudleya blochmaniae</i> ssp. <i>blochmaniae</i> Blochman's dudleya	PDCRA04051	None	None	G3T2	S2	1B.1
<i>Dudleya cymosa</i> ssp. <i>ovatifolia</i> Santa Monica dudleya	PDCRA040A5	Threatened	None	G5T1	S1	1B.1
<i>Dudleya multicaulis</i> many-stemmed dudleya	PDCRA040H0	None	None	G2	S2	1B.2
<i>Empidonax traillii extimus</i> southwestern willow flycatcher	ABPAE33043	Endangered	Endangered	G5T2	S1	
<i>Emys marmorata</i> western pond turtle	ARAAD02030	None	None	G3G4	S3	SSC
<i>Eryngium aristulatum</i> var. <i>parishii</i> San Diego button-celery	PDAP10Z042	Endangered	Endangered	G5T1	S1	1B.1
<i>Eucosma henei</i> Henne's eucosman moth	IILEM0R390	None	None	G1	S1	
<i>Eumops perotis californicus</i> western mastiff bat	AMACD02011	None	None	G5T4	S3S4	SSC
<i>Euphilotes battoides allyni</i> El Segundo blue butterfly	IILEPG201B	Endangered	None	G5T1	S1	
<i>Helianthus nuttallii</i> ssp. <i>parishii</i> Los Angeles sunflower	PDAST4N102	None	None	G5TH	SH	1A
<i>Horkelia cuneata</i> var. <i>puberula</i> mesa horkelia	PDROS0W045	None	None	G4T1	S1	1B.1
<i>Lasionycteris noctivagans</i> silver-haired bat	AMACC02010	None	None	G5	S3S4	
<i>Lasiurus cinereus</i> hoary bat	AMACC05030	None	None	G5	S4	
<i>Lasiurus xanthinus</i> western yellow bat	AMACC05070	None	None	G5	S3	SSC
<i>Lasthenia glabrata</i> ssp. <i>coulteri</i> Coulter's goldfields	PDAST5L0A1	None	None	G4T2	S2	1B.1
<i>Laterallus jamaicensis coturniculus</i> California black rail	ABNME03041	None	Threatened	G3G4T1	S1	FP
<i>Malacothamnus davidsonii</i> Davidson's bush-mallow	PDMAL0Q040	None	None	G2	S2	1B.2
<i>Microtus californicus stephensi</i> south coast marsh vole	AMAFF11035	None	None	G5T1T2	S1S2	SSC
<i>Monardella hypoleuca</i> ssp. <i>hypoleuca</i> white-veined monardella	PDLAM180A5	None	None	G4T3	S3	1B.3



Selected Elements by Scientific Name

California Department of Fish and Wildlife
California Natural Diversity Database

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
<i>Nama stenocarpa</i> mud nama	PDHYD0A0H0	None	None	G4G5	S1S2	2B.2
<i>Nasturtium gambelii</i> Gambel's water cress	PDBRA270V0	Endangered	Threatened	G1	S1	1B.1
<i>Navarretia fossalis</i> spreading navarretia	PDPLM0C080	Threatened	None	G2	S2	1B.1
<i>Navarretia prostrata</i> prostrate vernal pool navarretia	PDPLM0C0Q0	None	None	G2	S2	1B.1
<i>Neotoma lepida intermedia</i> San Diego desert woodrat	AMAFF08041	None	None	G5T3T4	S3S4	SSC
<i>Nyctinomops femorosaccus</i> pocketed free-tailed bat	AMACD04010	None	None	G4	S3	SSC
<i>Nyctinomops macrotis</i> big free-tailed bat	AMACD04020	None	None	G5	S3	SSC
<i>Oncorhynchus mykiss irideus pop. 10</i> steelhead - southern California DPS	AFCHA0209J	Endangered	None	G5T1Q	S1	
<i>Onychobaris langei</i> Lange's El Segundo Dune weevil	IICOL4W010	None	None	G1	S1	
<i>Onychomys torridus ramona</i> southern grasshopper mouse	AMAFF06022	None	None	G5T3	S3	SSC
<i>Orcuttia californica</i> California Orcutt grass	PMPOA4G010	Endangered	Endangered	G1	S1	1B.1
<i>Panoquina errans</i> wandering (=saltmarsh) skipper	IILEP84030	None	None	G4G5	S2	
<i>Passerculus sandwichensis beldingi</i> Belding's savannah sparrow	ABPBX99015	None	Endangered	G5T3	S3	
<i>Pelecanus occidentalis californicus</i> California brown pelican	ABNFC01021	Delisted	Delisted	G4T3T4	S3	FP
<i>Perognathus longimembris brevinasus</i> Los Angeles pocket mouse	AMAFD01041	None	None	G5T1T2	S1S2	SSC
<i>Perognathus longimembris pacificus</i> Pacific pocket mouse	AMAFD01042	Endangered	None	G5T1	S1	SSC
<i>Phacelia stellaris</i> Brand's star phacelia	PDHYD0C510	None	None	G1	S1	1B.1
<i>Phrynosoma blainvillii</i> coast horned lizard	ARACF12100	None	None	G3G4	S3S4	SSC
<i>Poliophtila californica californica</i> coastal California gnatcatcher	ABPBJ08081	Threatened	None	G4G5T2Q	S2	SSC
<i>Potentilla multijuga</i> Ballona cinquefoil	PDROS1B120	None	None	GX	SX	1A
<i>Pseudognaphalium leucocephalum</i> white rabbit-tobacco	PDAST440C0	None	None	G4	S2	2B.2



Selected Elements by Scientific Name

California Department of Fish and Wildlife
California Natural Diversity Database

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
<i>Quercus dumosa</i> Nuttall's scrub oak	PDFAG050D0	None	None	G3	S3	1B.1
<i>Riparia riparia</i> bank swallow	ABPAU08010	None	Threatened	G5	S2	
<i>Riversidian Alluvial Fan Sage Scrub</i> Riversidian Alluvial Fan Sage Scrub	CTT32720CA	None	None	G1	S1.1	
<i>Sidalcea neomexicana</i> salt spring checkerbloom	PDMAL110J0	None	None	G4	S2	2B.2
<i>Socalchemmis gertschi</i> Gertsch's socalchemmis spider	ILARAU7010	None	None	G1	S1	
<i>Sorex ornatus salicornicus</i> southern California saltmarsh shrew	AMABA01104	None	None	G5T1?	S1	SSC
<i>Southern Coast Live Oak Riparian Forest</i> Southern Coast Live Oak Riparian Forest	CTT61310CA	None	None	G4	S4	
<i>Southern Coastal Salt Marsh</i> Southern Coastal Salt Marsh	CTT52120CA	None	None	G2	S2.1	
<i>Southern Cottonwood Willow Riparian Forest</i> Southern Cottonwood Willow Riparian Forest	CTT61330CA	None	None	G3	S3.2	
<i>Southern Dune Scrub</i> Southern Dune Scrub	CTT21330CA	None	None	G1	S1.1	
<i>Southern Sycamore Alder Riparian Woodland</i> Southern Sycamore Alder Riparian Woodland	CTT62400CA	None	None	G4	S4	
<i>Spermolepis lateriflora</i> western bristly scaleseed	PDAP123080	None	None	G5	SH	2A
<i>Sternula antillarum browni</i> California least tern	ABNNM08103	Endangered	Endangered	G4T2T3Q	S2	FP
<i>Streptocephalus woottoni</i> Riverside fairy shrimp	ICBRA07010	Endangered	None	G1G2	S1S2	
<i>Symphyotrichum defoliatum</i> San Bernardino aster	PDASTE80C0	None	None	G2	S2	1B.2
<i>Symphyotrichum greatae</i> Greata's aster	PDASTE80U0	None	None	G2	S2	1B.3
<i>Taxidea taxus</i> American badger	AMAJF04010	None	None	G5	S3	SSC
<i>Thamnophis hammondi</i> two-striped gartersnake	ARADB36160	None	None	G4	S3S4	SSC
<i>Thelypteris puberula var. sonorensis</i> Sonoran maiden fern	PPTHE05192	None	None	G5T3	S2	2B.2
<i>Trigonoscuta dorothea dorothea</i> Dorothy's El Segundo Dune weevil	IICOL51021	None	None	G1T1	S1	
<i>Tryonia imitator</i> mimic tryonia (=California brackishwater snail)	IMGASJ7040	None	None	G2	S2	

**Selected Elements by Scientific Name****California Department of Fish and Wildlife****California Natural Diversity Database**

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
<i>Vireo bellii pusillus</i> least Bell's vireo	ABPBW01114	Endangered	Endangered	G5T2	S2	

Record Count: 104

Appendix C

Cultural Resources and Paleontological Resources Technical Reports, and AB 52 Consultation Materials

City of Beverly Hills La Brea Subarea Well, Water Treatment, and Transmission Main Project, City of Beverly Hills and Los Angeles, California

Cultural Resources Assessment Report

Prepared for

City of Beverly Hills
455 N. Rexford Dr.
Beverly Hills, CA 90210

September 2019



City of Beverly Hills La Brea Subarea Well, Water Treatment, and Transmission Main Project, City of Beverly Hills and Los Angeles, California

Cultural Resources Assessment Report

Prepared for:

City of Beverly Hills
455 N. Rexford Dr.
Beverly Hills, CA 90210

September 2019

Prepared by:

ESA

Project Directors:

Monica Strauss, M.A., RPA
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Report Authors:

Sara Dietler, B.A.
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Hanna Winzenried, M.Sc.
Michael Vader, B.A.

Project Location:

Beverly Hills (CA) USGS 7.5-minute Topographic Quad
Township 1 South, Range 14 and 15 West, Unsectioned

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Cultural resources are nonrenewable, and their scientific, cultural, and aesthetic values can be significantly impaired by disturbance. To deter vandalism, artifact hunting, and other activities that can damage cultural resources, the locations of cultural resources are confidential. The legal authority to restrict cultural resources information is in subdivision (r) of Section 6254 and Section 6254.10 of the California Government Code, subdivision (d) of Section 15120 of Title 14 of the California Code of Regulations, Section 304 of the National Historic Preservation Act of 1966, as amended, and Section 9 of the Archaeological Resources Protection Act.

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EXECUTIVE SUMMARY

City of Beverly Hills La Brea Subarea Well, Water Treatment, and Transmission Main Project - Cultural Resources Assessment Report

The City of Beverly Hills has retained Environmental Science Associates (ESA) to prepare a cultural resources assessment in support of an Initial Study Mitigated Negative Declaration (ISMND) being prepared for the La Brea Subarea Well, Water Treatment, and Transmission Main Project (proposed project) pursuant to the California Environmental Quality Act (CEQA). The project proposes to expand local water supply by providing an additional net 1,700 acre-feet per year of groundwater supply in the La Brea Subarea within the Central Groundwater Basin. The proposed project would include the construction of one groundwater production well in the La Brea Subarea, the rehabilitation of an existing 18-inch pipeline, and the connection of the rehabilitated pipeline to a newly 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. The Well Site would be located on a property currently owned by the City of Beverly Hills, at 1956 Chariton Street in the City of Los Angeles, and the existing residential structure at the location would be demolished before the construction of Well No. 1. The City is the lead agency responsible for compliance with CEQA. The proposed project would be located within the Los Angeles Basin and overlaps areas within the City of Beverly Hills and the City of Los Angeles.

A records search for the proposed project was conducted on April 11, 2019 by ESA staff 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).

A Sacred Lands File (SLF) search conducted by the California Native American Heritage Commission (NAHC) on April 25, 2019 indicated that Native American cultural resources are not known to be located within the proposed project. Consultation has been initiated as required by Assembly Bill 52 (AB 52), and is ongoing between the City of Beverly Hills and Native American tribes and will be summarized in the MND.

A cultural resources survey of the proposed project area was conducted on April 24, 2019 by ESA staff. The survey was aimed at identifying historic architectural resources and archaeological resources within or immediately adjacent to the proposed project. The residence located at 1956 Chariton Street that would be demolished prior to the installation of Well No. 1 was documented and previously recorded resource, P-19-189803 (wooden utility pole,) was re-visited to assess its current condition. Both resources were evaluated by ESA, as part of this assessment and are recommended ineligible for listing in the CRHR and do not qualify as historical resources pursuant to CEQA. Ground disturbing activities associated with the proposed project 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. Sensitivity for archaeological resources has been determined to be moderate to high and these resources could be preserved under the existing streets and historic residential development. Given the potential to encounter subsurface archaeological deposits during proposed project implementation, recommended mitigation measures for the retention of a qualified archaeologist, archaeological resources sensitivity training, archaeological monitoring, and protocols for the inadvertent discovery of archaeological resources and human remains are provided in the *Recommendations* section at the close of this report.

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

Cultural Resources Assessment Report

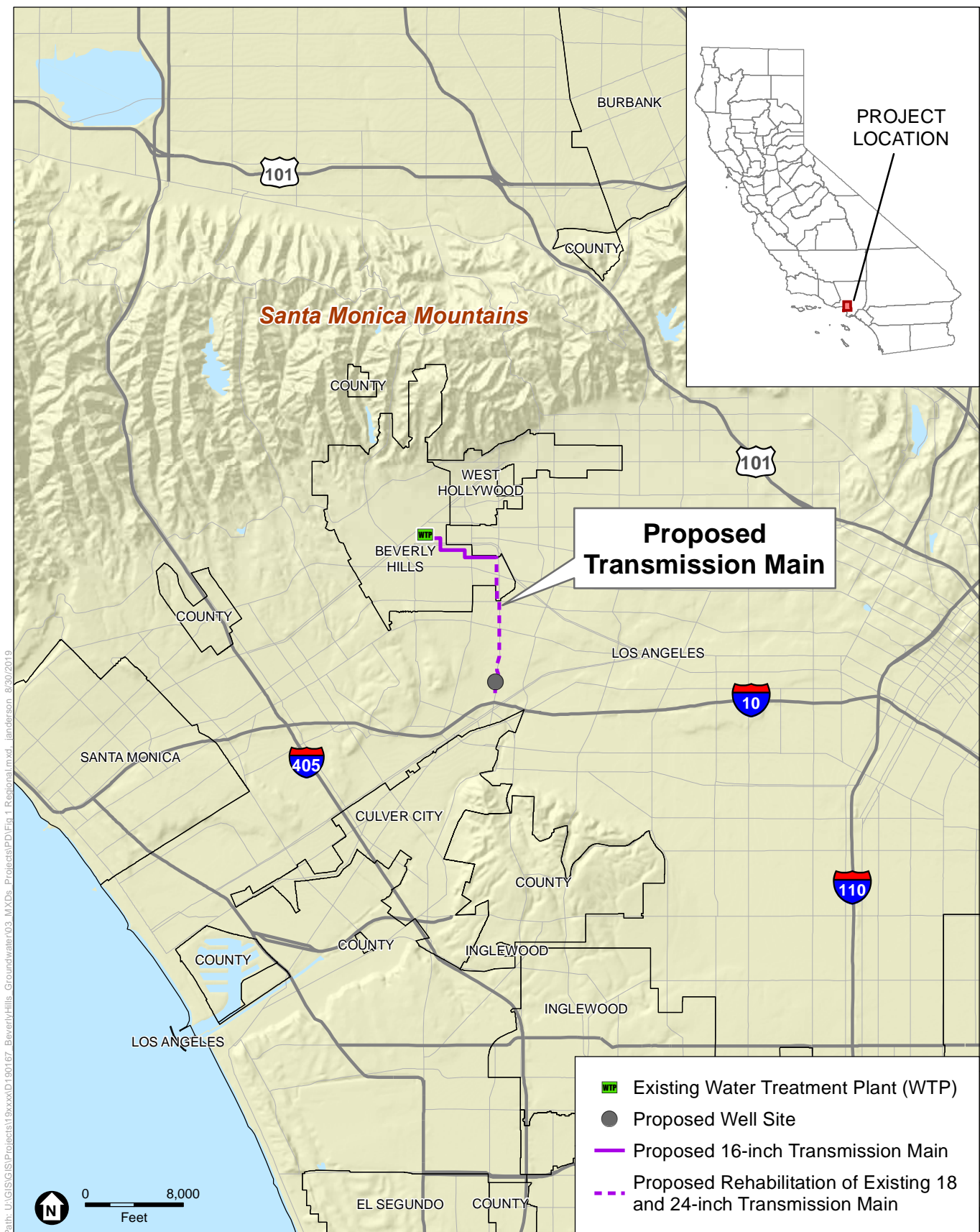
Introduction

The City of Beverly Hills (City) has retained Environmental Science Associates (ESA) to prepare a cultural resources assessment in support of an Initial Study Mitigated Negative Declaration (ISMND) being prepared for the La Brea Subarea Well, Water Treatment, and Transmission Main Project (proposed project) pursuant to the California Environmental Quality Act (CEQA). The project proposes to expand local water supply 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 proposed project would include the construction of one groundwater production well in the La Brea Subarea, the rehabilitation of an existing 18-inch pipeline, and the connection of the rehabilitated pipeline to a newly 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. The City is the lead agency responsible for compliance with CEQA.

ESA personnel involved in the preparation of this report are as follows: Monica Strauss, M.A., RPA., and Margarita Jerabek, Ph.D., project directors; Sara Dietler, B.A., project manager, surveyor, and report author; Gabrielle Harlan, Ph.D., and Michael Vader, B.A., report authors; Hanna Winzenried, M.Sc., report author and surveyor; and Jason Nielson, GIS specialist. Resumes of key personnel are included in **Appendix A**.

Project Location

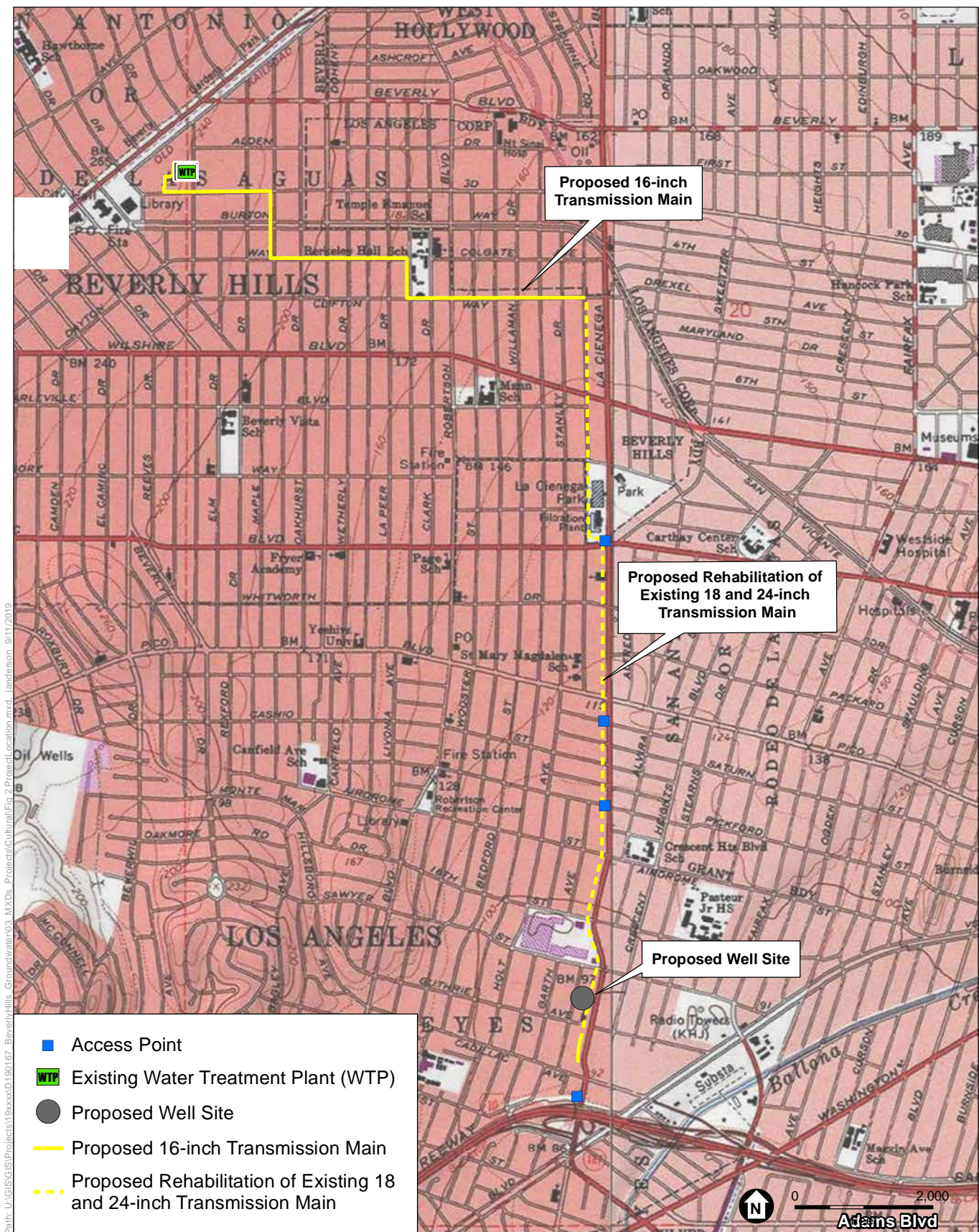
The proposed project would be located within the Los Angeles Basin and overlaps areas within the City of Beverly Hills and the City of Los Angeles (**Figure 1**). Specifically, the proposed project is located within unsectioned portions of Township 1 South, Range 14 and 15 West on the Beverly Hills, CA 7.5-minute USGS topographic quadrangle (**Figure 2**).



SOURCE: ESRI

La Brea Subarea Well and Transmission Main Project

Figure 1
Regional Location



Project Description

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.

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.

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.

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.

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.

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.

Transmission Main Rehabilitation and Construction

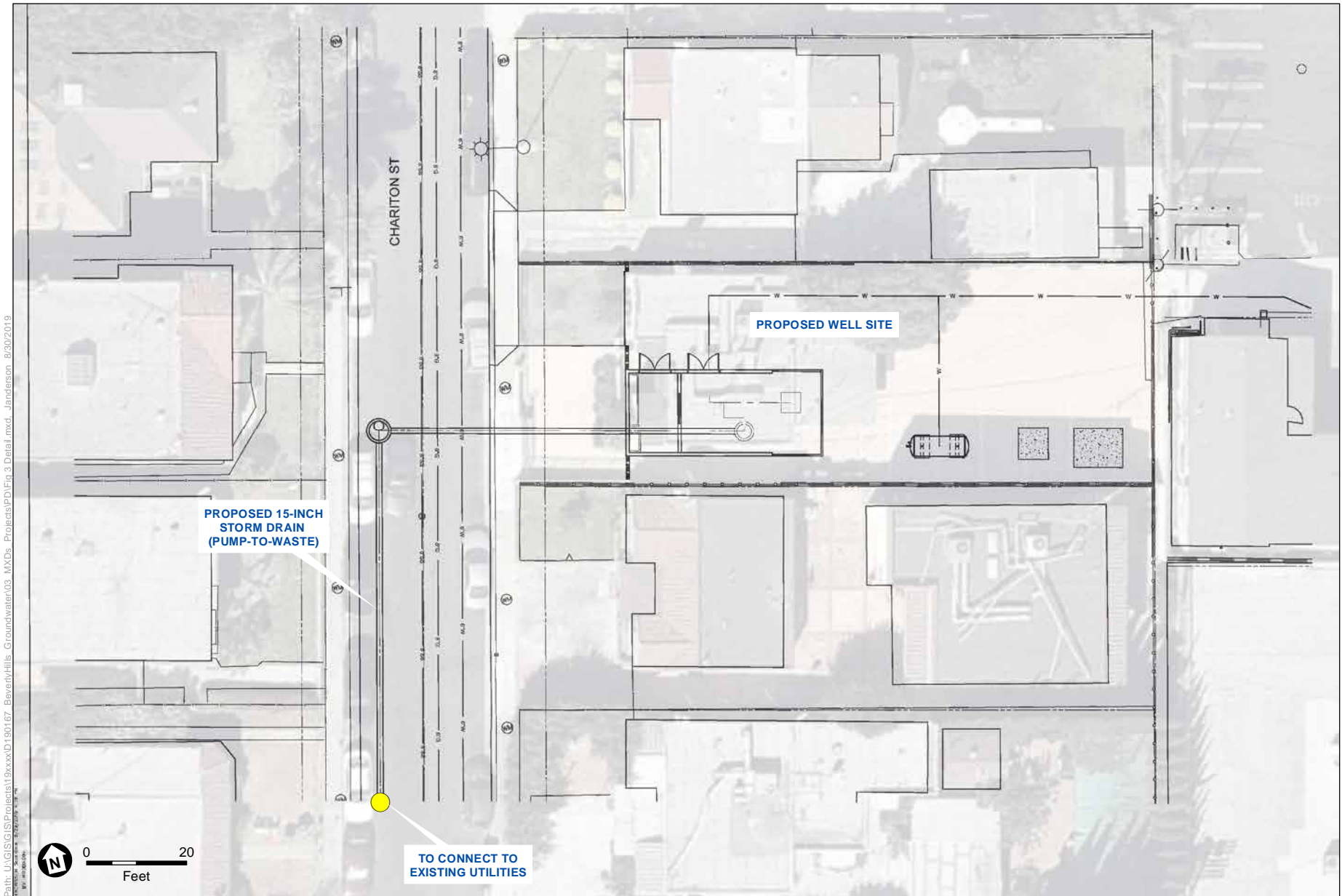
Pipeline construction equipment will be temporarily staged in areas immediately adjacent to roadways and/or stored off site. The transmission main alignment would be installed primarily within existing roadways and ROW to the extent feasible.

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. Implementation of the new 16-inch transmission main would require the 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 technique¹. 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.

¹ 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 transmission main.



SOURCE: Mapbox; City of Beverly Hills

La Brea Subarea Well and Transmission Main Project

Figure 3
Proposed Well Site

Setting

Natural Setting

The proposed project is located within residential and commercial areas of Beverly Hills and Los Angeles. Much of the proposed project area is comprised of existing streets lined with residential buildings.

Prehistoric Setting

The chronology of Southern California is typically divided into three general time periods: the Early Holocene (9,600 cal B.C. to 5,600 cal B.C.), the Middle Holocene (5,600 cal B.C. to 1,650 cal B.C.), and the Late Holocene (1,650 cal B.C. to cal A.D. 1769). This chronology is manifested in the archaeological record by particular artifacts and burial practices that indicate specific technologies, economic systems, trade networks, and other aspects of culture.

While it is not certain when humans first came to California, their presence in Southern California by about 9,600 cal B.C. has been well documented. At Daisy Cave, on San Miguel Island, cultural remains have been radiocarbon dated to between 9,150 and 9,000 cal B.C. (Byrd and Raab, 2007). During the Early Holocene (9,600 cal B.C. to 5,600 cal B.C.), the climate of Southern California became warmer and more arid and the human populations, who were represented by small hunter gathers until this point and resided mainly in coastal or inland desert areas, began exploiting a wider range of plant and animal resources (Byrd and Raab, 2007).

During the Late Holocene (1,650 cal B.C. to cal A.D. 1769), many aspects of Millingstone culture persisted, but a number of socioeconomic changes occurred (Erlandson, 1994; Wallace 1955; Warren, 1968). The native populations of Southern California were becoming less mobile and populations began to gather in small sedentary villages with satellite resource-gathering camps. Increasing population size necessitated the intensified use of existing terrestrial and marine resources (Erlandson, 1994). Evidence indicates that the overexploitation of larger, high-ranked food resources may have led to a shift in subsistence, towards a focus on acquiring greater amounts of smaller resources, such as shellfish and small-seeded plants (Byrd and Raab, 2007). Between about A.D. 800 and A.D. 1350, there was an episode of sustained drought, known as the Medieval Climatic Anomaly (MCA) (Jones et al., 1999). While this climatic event did not appear to reduce the human population, it did lead to a change in subsistence strategies in order to deal with the substantial stress on resources.

Given the increasing sedentism and growing populations during the Late Holocene, territorial conscription and competition became acute. Primary settlements or village sites were typically established in areas with available freshwater, and where two or more ecological zones intersected (McCawley, 1996). This strategic placement of living space provided a degree of security in that when subsistence resources associated with one ecological zone failed, the resources of another could be exploited (McCawley, 1996). Villages typically claimed and carefully defended fixed territories that may have averaged 30-square miles in size encompassing a variety of ecological zones that could be exploited for subsistence resources (McCawley, 1996).

The Late Holocene marks a period in which specialization in labor emerged, trading networks became an increasingly important means by which both utilitarian and non-utilitarian materials were acquired, and travel routes were extended. Trade during this period reached its zenith as asphaltum (tar), seashells, and steatite were traded from Catalina Island (*Pimu* or *Pimugna*) and coastal Southern California to the Great Basin. Major technological changes appeared as well, particularly with the advent of the bow and arrow sometime after cal A.D. 500, which largely replaced the use of the dart and atlatl (Byrd and Raab, 2007).

Ethnographic Setting

Gabrielino

The proposed project is located in a region traditionally occupied by the Takic-speaking Gabrielino Indians. The term “Gabrielino” is a general term that refers to those Native Americans who were administered by the Spanish at the Mission San Gabriel Arcángel. Prior to European colonization, the Gabrielino occupied a diverse area that included: the watersheds of the Los Angeles, San Gabriel, and Santa Ana rivers; the Los Angeles basin; and the islands of San Clemente, San Nicolas, and Santa Catalina (Kroeber, 1925). Their neighbors included the Chumash and Tataviam to the north, the Juañeno to the south, and the Serrano and Cahuilla to the east. The Gabrielino are reported to have been second only to the Chumash in terms of population size and regional influence (Bean and Smith, 1978). The Gabrielino language was part of the Takic branch of the Uto-Aztecan language family.

The Gabrielino Indians were hunter-gatherers and lived in permanent communities located near the presence of a stable food supply. Subsistence consisted of hunting, fishing, and gathering. Small terrestrial game was hunted with deadfalls, rabbit drives, and by burning undergrowth, while larger game such as deer were hunted using bows and arrows. Fish were taken by hook and line, nets, traps, spears, and poison (Bean and Smith, 1978). The primary plant resources were the acorn, gathered in the fall and processed in mortars and pestles, and various seeds that were harvested in late spring and summer and ground with manos and metates. The seeds included chia and other sages, various grasses, and islay or holly-leaved cherry. Community populations generally ranged from 50 to 100 inhabitants, although larger settlements may have existed. The Gabrielino are estimated to have had a population numbering around 5,000 in the pre-contact period (Kroeber, 1925).

The Late Prehistoric period, spanning from approximately 1,500 years B.P. to the mission era, is the period associated with the florescence of the Gabrielino (Wallace, 1955). Coming ashore near Malibu Lagoon or Mugu Lagoon in October of 1542, Juan Rodriguez Cabrillo was the first European to make contact with the Gabrielino Indians. The Gabrielino are reported to have been second only to their Chumash neighbors in terms of population size, regional influence, and degree of sedentism (Bean and Smith, 1978). Maps produced by early explorers indicate that at least 26 Gabrielino villages were within proximity to known Los Angeles River courses, while an additional 18 villages were reasonably close to the river (Gumprecht, 2001).

The closest village to the proposed project was the village of *Saa'annga*, located south of Ballona Creek approximately 2.5 miles south of the proposed project, (McCawley, 1996). The Kirkman-

Harriman Pictorial and Historical Map of Los Angeles County (Los Angeles Public Library, 1938) depicts three villages located to the north, west, and south of the proposed and are mapped within 2 miles.

Historic Setting

Spanish Period (1769–1821)

Although Spanish explorers made brief visits to the region in 1542 and 1602, sustained European exploration of southern California began in 1769, when Gaspar de Portolá and a small Spanish contingent began their exploratory journey along the California coast from San Diego to Monterey. This was followed in 1776 by the expedition of Father Francisco Garcés (Johnson and Earle, 1990). In the late 18th century, the Spanish began establishing missions in California and forcibly relocating and converting native peoples. In 1797, Father Fermín Francisco de Lasuén founded the Mission San Fernando Rey de España, located approximately 14.5 miles north of the proposed project (California Missions Resource Center, 2018). Disease and hard labor took a toll on the native population in California; by 1900, the Native Californian population had declined by as much as 90 percent (Cook, 1978). In addition, native economies were disrupted, trade routes were interrupted, and native ways of life were significantly altered.

In an effort to promote Spanish settlement of Alta California, Spain granted several large land concessions from 1784 to 1821. At this time, unless certain requirements were met, Spain retained title to the land (State Lands Commission, 1982).

Mexican Period (1821–1846)

The Mexican Period began when Mexico won its independence from Spain in 1821. Mexico continued to promote settlement of California with the issuance of land grants. In 1833, Mexico began the process of secularizing the missions, reclaiming the majority of mission lands and redistributing them as land grants. According to the terms of the Secularization Law of 1833 and Regulations of 1834, at least a portion of the lands would be returned to the Native populations, but this did not always occur (Milliken et al., 2009).

Many ranchos continued to be used for cattle grazing by settlers during the Mexican Period. Hides and tallow from cattle became a major export for Californios, many of whom became wealthy and prominent members of society. The Californios led generally easy lives, leaving the hard work to vaqueros and Indian laborers (Pitt, 1994; Starr, 2007).

American Period (1846–present)

In 1846, the Mexican-American War broke out. Mexican forces were eventually defeated in 1847 and Mexico ceded California to the United States as part of the Treaty of Guadalupe Hidalgo in 1848. California officially became one of the United States in 1850. While the treaty recognized right of Mexican citizens to retain ownership of land granted to them by Spanish or Mexican authorities, the claimant was required to prove their right to the land before a patent was given. The process was lengthy, and generally resulted in the claimant losing at least a portion of their land to attorney's fees and other costs associated with proving ownership (Starr, 2007).

When the discovery of gold in northern California was announced in 1848, a huge influx of people from other parts of North America flooded into California. The increased population provided an additional outlet for the Californios' cattle. As demand increased, the price of beef skyrocketed and Californios reaped the benefits. However, a devastating flood in 1861, followed by droughts in 1862 and 1864, led to a rapid decline of the cattle industry; over 70 percent of cattle perished during these droughts (McWilliams, 1946; Dinkelspiel, 2008). This event, coupled with the burden of proving ownership of their lands, caused many Californios to lose their lands during this period (McWilliams, 1946). Former ranchos were subsequently subdivided and sold for agriculture and residential settlement.

The first transcontinental railroad was completed in 1869, connecting San Francisco with the eastern United States. Newcomers poured into northern California. Southern California experienced a trickle-down effect, as many of these newcomers made their way south. The Southern Pacific Railroad extended this line from San Francisco to Los Angeles in 1876. The second transcontinental line, the Santa Fe, was completed in 1886 and caused a fare war, driving fares to an unprecedented low. Settlers flooded into the region and the demand for real estate skyrocketed. As real estate prices soared, land that had been farmed for decades outlived its agricultural value and was sold to become residential communities. The subdivision of the large ranchos took place during this time (Meyer, 1981; McWilliams, 1946).

History of the Project Area

The proposed project is located in an area partially encompassed by the Mexican-era Rancho Rodeo de las Aguas, or the Ranch of the Gathering of the Waters, named for the swamps or "cienegas" that dotted the landscape. The rancho was originally granted to Mexican settlers Maria Rita Valdez and her husband Vicente Valdez in 1822. Vicente, a retired soldier, died in 1828, leaving Maria in charge of the 4,500-acre cattle ranch (PCR Services Corporation, 2011). In 1852 after suffering an Indian attack, Maria moved to the safety of the pueblo of Los Angeles. In 1854, the ranch was sold for \$4,000 to two Americans, Benjamin Davis "Don Benito" Wilson and Major Henry Hancock (PCR Services Corporation, 2011). Don Benito was a major figure in the development of Southern California as well as a founder of the California citrus and viticulture industries. Hancock, a Civil War veteran, surveyed and subsequently acquired large tracts around the La Brea Tar Pits.

In 1862, Hancock sold his interests in the rancho to William Workman, who planned to convert the pasturelands of the rancho to agricultural use. Due to ongoing droughts, Workman's agricultural endeavors failed and much of the rancho lands were sold incrementally for sheep herding. In 1868, much of the rancho was purchased by wool dealer Edward O. Preuss. In 1869, Preuss sold a half-interest in the rancho to Francis F.P. Temple and the two created the De Las Aguas Land Association to subdivide the ranch into 75-acre farms (PCR Services, 2011). The land company failed and the rancho was sold to Henry Hanimel and Charles Denker, managers of the U.S. Hotel in Los Angeles, in 1881. Hanimel and Denker proposed the townsite of Morocco and subdivided the area in 1888. The town was centered around the train station located at present-day Canon Drive and Beverly Drive (PCR Services Corporation, 2011).

The townsite of Morocco never materialized and portions of the ranch passed to the Amalgamated Oil Company. However, the oil reserves underlying the area were too deeply buried to be accessed with the technology of the time, and, in 1906, the Amalgamated Oil Company reorganized as the Rodeo Land and Water Company and began to sub-divide the rancho for sale (PCR Services Corporation, 2011). The Rodeo Land and Water Company hired notable California park planner, Wilbur F. Cook, Jr., to plan a community. The community would become Beverly Hills and was one of the earliest planned communities in Southern California.

The Rodeo Land and Water Company's proposed the construction of a large resort hotel to attract investors and buyers. In 1911, the company commissioned architect Elmer Grey to design the Beverly Hills Hotel (PCR Services Corporation, 2011). In 1914, concern over establishment of a secure water system and the desire to improve the local school system prompted incorporation of City of Beverly Hills. Beginning the 1920s, Beverly Hills became a residential center for stars of the nascent movie industry. In 1920, newlyweds Douglas Fairbanks and Mary Pickford moved to the area, drawing other movie stars including Gloria Swanson, Will Rogers, and Charles Chaplin, creating the "Movie Colony" (PCR Services Corporation, 2011).

The southern portion of the Project Site was originally part of the Rincon De Los Bueyes land grant which means "Corner of the Oxen", it was known as this due to a large ravine at the southeast corner of the grant which served as a natural corral. La Cienega Boulevard, in the present day, follows the former route of this ravine. (Kielbasa 1997:111). Lying immediately south of Ranch Rodeo de las Aguas, Rincon De Los Bueyes was originally public land where citizens from the pueblo could graze their cattle. In 1823 the rancho was granted to Bernardo Higuera and Cornelio Lopez. Higuera later bequeathed his ownership in the rancho to his two sons Francisco and Secundino. Francisco then conveyed 100 acres of the rancho to Jose Antonio Rocha II in 1872 who later built the Rocha Adobe which still stands today on Shenandoah Street which continued to be farmland until much of the area and the larger Rancho was repeatedly subdivided, and then later annexed to the City of Los Angeles in 1915 as part of the Palms District (Kielbasa 1997:111-114).

Architectural Themes

This report includes an evaluation for a portion of the Project Area located at 1956 Chariton Street and the following themes provide a context for the historic evaluation.

Spanish Colonial Revival, 1912-1942 (SurveyLA, 2018)

By the early 1920s the Mission Revival had given way to the Spanish Colonial Revival. Influential in its spread were the Spanish-style buildings at the 1915 Panama California Exposition in San Diego, designed by Bertram Goodhue and Carleton Winslow, Sr. The buildings in San Diego provided a variety of Spanish forms, including the ornate Churrigueresque, discussed below as a separate sub-theme.

Closer to home is an earlier example of the Spanish Colonial Revival, the Southwest Museum (L.A. Historic-Cultural Monument No. 283) (**Figure 4**). It is located at 234 Museum Drive in the Mount Washington neighborhood of Northeast Los Angeles and constructed of reinforced concrete between 1912 and 1914. Its architects were Sumner Hunt and Silas R. Burns. (It is

reached from Museum Drive by way of a tunnel and elevator, the portal to which was designed by Allison and Allison in a Pre-Columbian Revival style and completed in 1920) (Herr, 2002).



SOURCE: Los Angeles Public Library

Beverly Hills MND Groundwater Well and Pipeline Project/190167.00

Figure 4

Southwest Museum, 1912-1914, L.A. HCM No. 283

The Southwest Museum as an institution was founded in 1903 by Charles Lummis, whose home, El Alisal (L.A. Historic-Cultural Monument No. 68) is nearby. The purpose of the museum was to collect, preserve, and exhibit artifacts of the Native Americans of the Southwest. It was the first museum established in Los Angeles and the oldest privately-endowed museum in the state dedicated to Native American culture (Herr, 2002).

The Southwest Museum building illustrates the Spanish Colonial Revival treatment of the structure as a series of picturesquely arranged masses, to be seen in three dimensions. The detailing is austere, with characteristic features limited to expanses of undecorated walls, low-pitched red-tiled gabled roofs, arched windows, and an occasional tower with a parapeted, hipped, or conical roof. This approach was influenced by growing interest in the vernacular architecture of Andalusia, in southern Spain).

Advancing the Spanish Colonial Revival were publications by architects who had studied the historic structures of Mexico and the Mediterranean, in particular that of Andalusia. Typical was *Architectural Details: Spain and the Mediterranean*, published in 1926 by Richard Requa. It stressed the appropriateness of Mediterranean form for a climate such as Southern California and called out the elements of the style. In addition to expanses of unbroken white or pastel-colored walls and low-sloped red tile roofs, Requa noted the importance of enclosed outdoor spaces and the need for details such as wrought iron for balconies and for *rejas*, or window grilles (Polyzoides et al., 1992).

Because of the stress on picturesquely assembled masses, the Spanish Colonial Revival was extremely flexible. It could vary in scale and use. Its only limitation was that it worked best in stand-alone buildings, where its three-dimensional nature could be shown. It was less successful as part of a dense streetscape, tight against neighboring buildings. For that it often employed a variation, the Churrigueresque style (Gebhard and Winter, 2003).

The Spanish Colonial became ubiquitous in 1920s Los Angeles. Most every building type made use of it, employing all forms of construction –wood frame, brick masonry, reinforced concrete, even adobe (discussed in a separate sub-theme). Because of its widespread use, it is best examined by separating examples into building-type categories. These include residential (single-family and multi-family), commercial, industrial, and institutional.

Single-Family Residential

The Spanish-Colonial Revival was particularly popular in automobile-oriented residential districts developed during the 1920s. Single family homes ranged from small one-story cottages built on speculation by contractors to large multi-story villas designed by noted architects.² All were characterized by stucco walls, red-tile roofs, simplified detailing, and picturesque massing. An example of a relatively modest architect-designed single-story home is the Octavius W. Morgan Residence of 1929 (L.A. Historic-Cultural Monument No. 444). Located at 181 South Alta Vista Boulevard in the Wilshire district, it was the home of one of the principles in the architectural firm of Morgan, Walls and Clements (Herr, 2002).

Of note is the characteristic asymmetry of the façade, along with the assemblage of low-sloped redtiled gabled roofs and limited openings punched through apparently thick walls. Although construction is stucco on wood frame, Morgan was able to create the feeling of adobe with recessed windows. Also characteristic of the Spanish Colonial Revival are the gable-end attic vents consisting of small-diameter clay pipes arranged in triangles and diamonds (LADBS).

An example of a large two-story single-family residence is the Outpost II from 1929 (L.A. Historic-Cultural Monument No. 673) (**Figure 5**). Located at 1851 Outpost Drive in Hollywood, it occupies the site of the Outpost, an adobe structure in which the Treaty of Cahuenga was signed in 1847, ending California's role in the Mexican War. The architect was R. F. Pierson and construction of the two-story house is of stucco on metal lath over wood frame (Herr, 2002).



SOURCE : Office of Historic Resources —Beverly Hills MND Groundwater Well and Pipeline Project/190167.00

² Neighborhoods of Spanish Colonial Revival style residences are discussed in the Period Revival/Housing the Masses theme of the Architecture and Engineering context.

Figure 5

The Outpost II, 1929, LA HCM No. 673

The vocabulary of stucco walls, low-sloped tiled roofs, and picturesque massing is the same as that found in the Octavius W. Morgan residence (**Figure 6**). Of note are the use of the single-slope or shed roof on the far-left mass, the occasional arched opening, and the stepped enclosure for the exterior stairway at the center left. Of note also is the exterior balcony. It is a feature that is typical of the Monterey Revival Style, discussed below, but here it is treated in a heavier and more ornate manner that is characteristic of the Spanish Colonial Revival.



SOURCE : Office of Historic Resources

Beverly Hills MND Groundwater Well and Pipeline Project/190167.00

Figure 6

Octavius W. Morgan Residence, 1929, LA HCM No. 444

Community and Operative Builders (1888-1940) (SurveyLA, 2016)

Single- and multi-family residential districts that were developed by prominent 20th century developer-builders were evaluated using the Developers and the Development Process theme. Within the West Adams-Baldwin Hills-Leimert CPA, there are subdivisions and planned communities developed by significant individuals such as Elwain Steinkamp and Walter Leimert. Resources representing this Context/Theme are located throughout the CPA and generally date to the 1930s (**Figures 7, 8, and 9**). These districts were also evaluated by SurveyLA under the Architecture and Engineering context as significant concentrations of Period Revival style architecture, primarily Spanish Colonial Revival.



SOURCE : SurveyLA

Beverly Hills MND Groundwater Well and Pipeline Project/190167.00

Figure 7
Dublin Avenue in the Donna Park Historic District (1937-1938)



SOURCE : SurveyLA

Beverly Hills MND Groundwater Well and Pipeline Project/190167.00

Figure 8
3861 S. Roxton Avenue (contributor to the Donna Park Historic District), 1938



SOURCE : SurveyLA

Beverly Hills MND Groundwater Well and Pipeline Project/190167.00

Figure 9
4256 S. Creed Avenue (contributor to the Leimert Park Historic District), 1932

Early Single-Family Residential Development (1880-1930) (SurveyLA, 2016)

Resources were determined to be eligible as significant examples of early residential development within the CPA if they largely pre-dated the development of surrounding neighborhoods. In the West Adams-Baldwin Hills-Leimert CPA, this included late 19th century and early 20th century residences (**Figures 10, 11, and 12**). These resources are rare remaining examples of the earliest periods of residential development in the area.



SOURCE : SurveyLA

Beverly Hills MND Groundwater Well and Pipeline Project/190167.00

Figure 10
2861 S. Corning Avenue, 1904



SOURCE : SurveyLA

Beverly Hills MND Groundwater Well and Pipeline Project/190167.00

Figure 11
5615 W. Homeside Avenue, 1890



SOURCE : SurveyLA

Beverly Hills MND Groundwater Well and Pipeline Project/190167.00

Figure 12
4711 W. St. Elmo Drive, 1902

Regulatory Framework

Numerous laws and regulations require state, and local agencies to consider the effects a project may have on cultural resources. These laws and regulations stipulate a process for compliance, define the responsibilities of the various agencies proposing the action, and prescribe the relationship among other involved agencies.

State

California Environmental Quality Act

CEQA is the principal statute governing environmental review of projects occurring in the state and is codified at *Public Resources Code (PRC) Section 21000 et seq.* CEQA requires lead agencies to determine if a proposed project would have a significant effect on the environment, including significant effects on historical or unique archaeological resources. Under CEQA (PRC Section 21084.1), a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

The *CEQA Guidelines* (Title 14 California Code of Regulations [CCR] Section 15000 et seq.) recognize in CCR Section 15064.5 that historical resources include: (1) a resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (CRHR); (2) a resource included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); and (3) any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California by the lead agency, provided the lead agency's determination is supported by substantial evidence in light of

the whole record. The fact that a resource does not meet the three criteria outlined above does not preclude the lead agency from determining that the resource may be an historical resource as defined in PRC Sections 5020.1(j) or 5024.1.

If a lead agency determines that an archaeological site is a historical resource, the provisions of PRC Section 21084.1 of CEQA and CCR Section 15064.5 of the *CEQA Guidelines* apply. If an archaeological site does not meet the criteria for a historical resource contained in the *CEQA Guidelines*, then the site may be treated in accordance with the provisions of PRC Section 21083, which is as a unique archaeological resource. As defined in PRC Section 21083.2 of CEQA a “unique” archaeological resource is an archaeological artifact, object, or site, about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information;
- Has a special and particular quality such as being the oldest of its type or the best available example of its type; or,
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

If an archaeological site meets the criteria for a unique archaeological resource as defined in PRC Section 21083.2, then the site is to be treated in accordance with the provisions of Section PRC 21083.2, which state that if the lead agency determines that a project would have a significant effect on unique archaeological resources, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place (PRC Section 21083.1(a)). If preservation in place is not feasible, mitigation measures shall be required. The *CEQA Guidelines* note that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment (CCR Section 15064.5(c)(4)).

A significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in *CEQA Guidelines* Section 15064.5(a). Substantial adverse change is defined as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired” (CCR Section 15064.5(b)(1)). According to CCR Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

- A. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the CRHR; or
- B. Account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the PRC or its identification in a historical resources survey meeting the requirements of PCR section 5024.1(g), unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

- C. Convey its historical significance and that justify its eligibility for inclusion in the CRHR as determined by a Lead Agency for purposes of CEQA.

In general, a project that complies with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* (Standards) (Grimmer, 2017) is considered to have mitigated its impacts to historical resources to a less-than-significant level (CCR Section 15064.5(b)(3)).

California Register of Historical Resources

The CRHR is “an authoritative guide in California to be used by State and local agencies, private groups, and citizens to identify the State’s historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from t substantial adverse change” (PRC Section 5024.1(a)). The criteria for eligibility for the CRHR are based upon NRHP criteria (PRC Section 5024.1(b)). Certain resources are determined by the statute to be automatically included in the CRHR, including California properties formally determined eligible for, or listed in, the NRHP.

To be eligible for the CRHR, a prehistoric or historic-period property must be significant at the local, state, and/or federal level under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

A resource eligible for the CRHR must meet one of the criteria of significance described above, and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the NRHP, but it may still be eligible for listing in the CRHR.

Additionally, the CRHR consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The CRHR automatically includes the following:

- California properties listed on the NRHP and those formally determined eligible for the NRHP;
- California Registered Historical Landmarks from No. 770 onward; and,
- Those California Points of Historical Interest that have been evaluated by the OHP and have been recommended to the State Historical Commission for inclusion on the CRHR.

Other resources that may be nominated to the CRHR include:

- Historical resources with a significance rating of Category 3 through 5 (those properties identified as eligible for listing in the NRHP, the CRHR, and/or a local jurisdiction register);
- Individual historical resources;
- Historical resources contributing to historic districts; and,
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone.

California Health and Safety Code Section 7050.5

California Health and Safety Code Section 7050.5 requires that in the event human remains are discovered, the County Coroner be contacted to determine the nature of the remains. In the event the remains are determined to be Native American in origin, the Coroner is required to contact the California Native American Heritage Commission (NAHC) within 24 hours to relinquish jurisdiction.

California Public Resources Code Section 5097.98

California PRC Section 5097.98, as amended, provides procedures in the event human remains of Native American origin are discovered during project implementation. PRC Section 5097.98 requires that no further disturbances occur in the immediate vicinity of the discovery, that the discovery is adequately protected according to generally accepted cultural and archaeological standards, and that further activities take into account the possibility of multiple burials. PRC Section 5097.98 further requires the NAHC, upon notification by a County Coroner, designate and notify a Most Likely Descendant (MLD) regarding the discovery of Native American human remains. The MLD has 48 hours from the time of being granted access to the site by the landowner to inspect the discovery and provide recommendations to the landowner for the treatment of the human remains and any associated grave goods.

In the event that no descendant is identified, or the descendant fails to make a recommendation for disposition, or if the land owner rejects the recommendation of the descendant, the landowner may, with appropriate dignity, reinter the remains and burial items on the property in a location that will not be subject to further disturbance.

California Government Code Sections 6254(r) and 6254.10

These sections of the California Public Records Act were enacted to protect archaeological sites from unauthorized excavation, looting, or vandalism. Section 6254(r) explicitly authorizes public agencies to withhold information from the public relating to “Native American graves, cemeteries, and sacred places and records of Native American places, features, and objects described in PRC Sections 5097.9 and 5097.993 maintained by, or in the possession of, the Native American Heritage Commission, another state agency, or a local agency.” Section 6254.10 specifically exempts from disclosure requests for “records that relate to archaeological site information and reports, maintained by, or in the possession of the Department of Parks and Recreation, the State Historical Resources Commission, the State Lands Commission, the Native American Heritage Commission, another state agency, or a local agency, including the records

that the agency obtains through a consultation process between a California Native American tribe and a state or local agency.”

Assembly Bill 52 and Related Public Resources Code Sections

Assembly Bill (AB) 52 was approved by California State Governor Edmund Gerry “Jerry” Brown, Jr. on September 25, 2014. The act amended California PRC Section 5097.94, and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 applies specifically to projects for which a Notice of Preparation (NOP) or a Notice of Intent to Adopt a Negative Declaration or Mitigated Negative Declaration (MND) will be filed on or after July 1, 2015. The primary intent of AB 52 was to include California Native American Tribes early in the environmental review process and to establish a new category of resources related to Native Americans that require consideration under CEQA, known as tribal cultural resources. PRC Section 21074(a)(1) and (2) defines tribal cultural resources as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe” that are either included or determined to be eligible for inclusion in the CRHR or included in a local register of historical resources, or a resource that is determined to be a tribal cultural resource by a lead agency, in its discretion and supported by substantial evidence. On July 30, 2016, the California Natural Resources Agency adopted the final text for tribal cultural resources update to Appendix G of the CEQA Guidelines, which was approved by the Office of Administrative Law on December 28, 2018.

PRC Section 21080.3.1 requires that within 14 days of a lead agency determining that an application for a project is complete, or a decision by a public agency to undertake a project, the lead agency provide formal notification to the designated contact, or a tribal representative, of California Native American Tribes that are traditionally and culturally affiliated with the geographic area of the project (as defined in PRC Section 21073) and who have requested in writing to be informed by the lead agency (PRC Section 21080.3.1(b)). Tribes interested in consultation must respond in writing within 30 days from receipt of the lead agency’s formal notification and the lead agency must begin consultation within 30 days of receiving the tribe’s request for consultation (PRC Sections 21080.3.1(d) and 21080.3.1(e)).

PRC Section 21080.3.2(a) identifies the following as potential consultation discussion topics: the type of environmental review necessary; the significance of tribal cultural resources; the significance of the project’s impacts on the tribal cultural resources; project alternatives or appropriate measures for preservation; and mitigation measures. Consultation is considered concluded when either: (1) the parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached (PRC Section 21080.3.2(b)).

If a California Native American tribe has requested consultation pursuant to Section 21080.3.1 and has failed to provide comments to the lead agency, or otherwise failed to engage in the consultation process, or if the lead agency has complied with Section 21080.3.1(d) and the California Native American tribe has failed to request consultation within 30 days, the lead agency may certify an EIR or adopt an MND (PRC Section 21082.3(d)(2) and (3)).

PRC Section 21082.3(c)(1) states that any information, including, but not limited to, the location, description, and use of the tribal cultural resources, that is submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public without the prior consent of the tribe that provided the information. If the lead agency publishes any information submitted by a California Native American tribe during the consultation or environmental review process, that information shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.

Local

City of Beverly Hills

The City's Historic Preservation Ordinance (Municipal Code Title 10 Chapter 3 Article 32; BHMC 10-3- 32) authorizes the Cultural Heritage Commission (CHC) to recommend the nomination of properties as local landmarks to the City Council. The Council may designate local landmarks and historic districts by the procedures outlined in the ordinance. The Preservation Ordinance also establishes criteria and the process for evaluating and designating properties as potential local landmarks. Under the City's criteria a property must be more than 45 years old, unless it possesses exceptional significance; retain sufficient historical integrity to physically illustrate its significance; and satisfy significance criteria.

To be eligible for local designation as a historic landmark ((Municipal Code Title 10 Chapter 3 Article 32; BHMC 10-3- 3212), properties must satisfy the following criteria:

A. A Landmark must satisfy all of the following requirements:

1. It is at least forty five (45) years of age, or is a property of extraordinary significance;
2. It possesses high artistic or aesthetic value, and embodies the distinctive characteristics of an architectural style or architectural type or architectural period;
3. It retains substantial integrity from its period of significance; and
4. It has continued historic value to the community such that its designation as a landmark is reasonable and necessary to promote and further the purposes of this article.

B. In addition to the requirements set forth in Paragraph A above, a landmark must satisfy at least one of the following requirements:

1. It is listed on the NRHP of Historic Places;
2. It is an exceptional work by a master architect;
3. It is an exceptional work that was owned and occupied by a person of great importance, and was directly connected to a momentous event in the person's endeavors or the history

of the nation. For purposes of this paragraph, personal events such as birth, death, marriage, social interaction, and the like shall not be deemed to be momentous;

4. It is an exceptional property that was owned and occupied by a person of great local prominence;
5. It is an iconic property; or
6. The landmark designation procedure is initiated, or expressly agreed to, by the owner(s) of the property.

City of Los Angeles General Plan

The City of Los Angeles General Plan (adopted 2001) states as its objective, to “protect the City’s archaeological and paleontological resources for historical, cultural, research, and/or educational purposes” by continuing “to identify and protect significant archaeological and paleontological resources known to exist or that are identified during land development, demolition, or property modification activities.”

In addition, the City will:

continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities...The City's environmental guidelines require the applicant to secure services of a bona fide archaeologist to monitor excavations or other subsurface activities associated with a development project in which all or a portion is deemed to be of archaeological significance. Discovery of archaeological materials may temporarily halt the project until the site has been assessed, potential impacts evaluated and, if deemed appropriate, the resources protected, documented and/or removed (City of Los Angeles, 2001).

In addition to the NRHP and the CRHR, three additional types of historic designations may apply at a local level:

1. Historic-Cultural Monument
2. Designation by the Community Redevelopment Agency as being of cultural or historical significance within a designated redevelopment area
3. Classification by the City Council as an Historic Preservation Overlay Zone

In addition, the Los Angeles Municipal Code (LAMC) Section 91.106.4.5 states that the Building Department “shall not issue a permit to demolish, alter or remove a building or structure of historical, archaeological or architectural consequence if such building or structure has been officially designated” by a federal, state, or local authority.

City of Los Angeles Cultural Heritage Ordinance

The City of Los Angeles enacted a Cultural Heritage Ordinance in April 1962, which defines Historic-Cultural Monuments as sites, buildings, or structures of particular historic or cultural

significance to the City in which the broad cultural, political, or social history of the nation, state, or City is reflected or exemplified, including sites and buildings associated with important personages or which embody certain distinguishing architectural characteristics and are associated with a notable architect. These Historic-Cultural Monuments are regulated by the City of Los Angeles' Cultural Heritage Commission and the City Council.

Los Angeles Cultural Heritage Ordinance Eligibility Criteria

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1967 and amended it in 2007 (Los Angeles Administrative Code, Chapter 9, Division 22, Article 1, Section 22.171.7). The Cultural Heritage Ordinance establishes criteria for designating a local historical resource as an Historic-Cultural Monument (HCM). An HCM is any site (including significant trees or other plant life located on the site), building or structure of particular historic or cultural significance to the City, including historic structures or sites:

1. In which the broad cultural, economic or social history of the nation, State or community is reflected or exemplified; or
2. Which is identified with historic personages or with important events in the main currents of national, State or local history; or
3. Which embodies the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period, style or method of construction; or
4. Which is a notable work of a master builder, designer, or architect whose individual genius influenced his or her age.

SurveyLA Eligibility Standards

SurveyLA was a citywide survey that identified and documented significant historic resources representing important themes in the City of Los Angeles' history. The survey and resource evaluations were completed by consultant teams under contract to the City of Los Angeles and the supervision of the Office of Historic Resources (OHR). The program was managed by the OHR, which maintains a website for SurveyLA (SurveyLA, 2017). The field surveys covered the period from approximately 1850 to 1980 and included individual resources such as buildings, structures, objects, natural features and cultural landscapes, as well as areas and districts (archaeological resources will be included in a future survey phase). Significant resources reflected important themes in the City of Los Angeles' growth and development in various areas including architecture, city planning, social history, ethnic heritage, politics, industry, transportation, commerce, entertainment, and others. Field surveys, conducted from 2010 to 2017, were completed in three phases by Community Plan Area. All tools and methods developed for SurveyLA met state and federal professional standards for survey work.

Los Angeles' citywide Historic Context Statement (HCS) was designed for use by SurveyLA field surveyors and by all agencies, organizations, and professionals completing historic resources surveys in the City of Los Angeles. The context statement was organized using the Multiple Property Documentation (MPD) format developed by the National Park Service (NPS) for use in nominating properties related by theme to the NRHP. This format provided a consistent framework for evaluating historic resources. It was adapted for local use to evaluate the eligibility

of properties for city, state, and federal designation programs and to facilitate environmental review processes (City of Los Angeles, 2016). The HCS used Eligibility Standards to identify the character defining, associative features, and integrity aspects a property should retain to be a significant example of a type within a defined theme. Eligibility Standards also indicate the general geographic location, area of significance, applicable criteria, and period of significance associated with that type. These Eligibility Standards are guidelines based on knowledge of known significant examples of property types; properties do not need to meet all of them in order to be eligible. Assessment of integrity considers several variables, include the significance criteria under which the resource is eligible.

Archival Research

SCCIC Records Search

A records search for the proposed project was conducted on April 11, 2019 by ESA staff 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 as well as the optimal zone of the La Brea Subarea where additional wells would later be sited, and historic architectural resources within 0.25 miles of the proposed project. In addition, the California Points of Historical Interest, the California Historical Landmarks, the CRHR, the NRHP, the Archaeological Determinations of Eligibility, and the California State Historic Resources Inventory (HRI) were reviewed.

Previous Cultural Resources Investigations

The records search results indicate that 67 cultural resources studies have been conducted within a 0.5-mile radius of the proposed project area (**Table 1**). Approximately 10 percent of the 0.5-mile records search radius has been included in previous cultural resources surveys. Of the 67 previous studies, eight (LA-01968, -04881, -07088, -08955, -11005, -11363, -11822, and -12522) overlap the proposed project. Approximately 5 percent of the proposed project has been included as part of previous studies.

TABLE 1
PREVIOUS CULTURAL RESOURCES INVESTIGATIONS

Authors	Report No. (LA-)	Title	Year
Anonymous	03673	<i>Historic Property Survey Report North Outfall Relief Sewer</i>	1987
Anonymous	03678	<i>Request for Determination of Eligibility for Inclusion in the National Register of Historic Places</i>	n.d.
Anonymous	03679	<i>Request for Determination of Eligibility for Inclusion in the National Register of Historic Places</i>	n.d.
Anonymous	03680	<i>Request for Determination of Eligibility for Inclusion in the National Register of Historic Places</i>	n.d.
Bartoy, K.	07334	<i>San Francisquito Women's Club Park (Special Use Permit SCM302301) Angeles National Forest, Los Angeles County, California</i>	2003
Belous, Russell E. and Charles E. Rozaire	00751	<i>Preliminary Report on the Archaeology of the La Ballona Creek Area, Los Angeles County</i>	1950

Authors	Report No. (LA-)	Title	Year
Billat, Lorna	06520	Nextel Communications Proposed Wireless Telecommunications Service Facilities Southern California	2001
Bissell, Ronald M.	01968*	Cultural Resources Literature Review of Metro Rail Red Line Western Extension Alternatives, Los Angeles, Los Angeles County, California	1989
Bolin, David P.	06518	Proposed AT&T Wireless Telecommunication Equipment Installation 911 Wilshire Boulevard, Beverly Hills, 90210	2001
Bonner, Wayne	10661	Cultural Resources Records Search and Site Visit Results for AT&T Mobility, LLC Candidate ELO352-01 (Wilshire Medical Center), 9033 Wilshire Boulevard, Beverly Hills, Los Angeles County, California	2010
Bonner, Wayne	11946	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate SV11698A (Emack Building), 6330 San Vicente Boulevard, Los Angeles, Los Angeles County, California	2012
Bonner, Wayne	12004	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate SV01671B (01671 Amir Development) 8730 Wilshire Boulevard, Beverly Hills, Los Angeles County, California	2012
Bonner, Wayne and Kathleen Crawford	12146	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate SV00225A (LA225 Hall Studio) 5005 Washington Boulevard, Los Angeles, Los Angeles County, California	2012
Bonner, Wayne and Kathleen Crawford	12114	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate SV00065A (SM039 Lexington Ventures) 9350 Wilshire Boulevard, Beverly Hills, Los Angeles County, California	2012
Bonner, Wayne H.	07340	Cultural Resource Records Search and Site Visit Results for Cingular Telecommunications Facility Candidate La-467-01 (el-044-01) 5035 Coliseum Street, Los Angeles, Los Angeles County, California	2005
Bonner, Wayne H. and Christeen Taniguchi	07344	Records Search Results and Site Visit for Sprint Telecommunications Facility Candidate La60x424a (Louisiana) 5005 West Washington Boulevard, Los Angeles, Los Angeles County, California	2004
Bucknam, Bonnie M.	03583	The Los Angeles Basin and Vicinity: a Gazetteer and Compilation of Archaeological Site Information	1974
Chartkoff, Joe and Kerry Chartkoff	03524	Ucas-073 Venice Boulevard 7-la-187, Los Angeles County	1965
Chartkoff, Kerry and Joe Chartkoff	03525	Ucas-092 Route 2 Freeway Los Angeles County West, Los Angeles, Beverly Hills	1966
Daly, Pam and Nancy Sikes	11642	Westside Subway Extension Project, Historic Properties and Archaeological Resources Supplemental Survey Technical Reports	2012
Dillon, Brian D.	03501	Archaeological Record Search and Impact Evaluation for the Los Angeles Wastewater Program Management Project Los Angeles, California	1990
Duke, Curt	04553	Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 619-06, in the County of Los Angeles, California	1999
Duke, Curt	05351	Cultural Resources Assessment for AT&T Fixed Wireless Services Facility Number R315.1, County of Los Angeles, California	2000
Duke, Curt	06483	Cultural Resource Assessment Cingular Wireless Facility No. Sm 022-01 Los Angeles County, California	2001
Duke, Curt	06501	Cultural Resource Assessment Cingular Wireless Facility No. Sm 039-01 Los Angeles County, California	2001
Duke, Curt	06510	Cultural Resource Assessment Cingular Wireless Facility No. Sm 129-02 Los Angeles County, California	2002
Duke, Curt	06513	Cultural Resource Assessment for AT&T Wireless Services Facility Number C924.1, County of Los Angeles, California	2001
Duke, Curt and Judith Marvin	08096	Cultural Resources Assessment Cingular Wireless Facility No. La453-04 City and County of Los Angeles, California	2003
Foster, John M. and Dana Slawson	04667	Historic Resource Evaluation Report Exposition Boulevard Right-of-way Regional Bikeway Project Los Angeles County, California	1999
Greenwood, Roberta S., Scott Savastio, and Peter Messick	10506	Cultural Resources Monitoring: North Outfall Sewer - East Central Interceptor Sewer Project	2004
Hatheway, Roger G.	11822*	Archival Documentation Report for the Chateau Arnaz Condominium Project Documenting Buildings Located at 143, 145, 147, and 149 N Arnaz Dr, Beverly Hills, California	2001
Hatoff, Brian	10580	Verizon Cellular Communications Tower Site - LTE Beverly Vista, 9033 Wilshire Boulevard, Beverly Hills, CA. 90211	2010
Horne, Melinda C.	11409	Construction Phase Cultural Resources Monitoring and Treatment Plan for the City of Los Angeles North Outfall - East Central Interceptor Sewer Project	2000

Authors	Report No. (LA-)	Title	Year
King, Chester	03587	<i>Prehistoric Native American Cultural Sites in the Santa Monica Mountains</i>	1994
King, Phil V.	08955*	<i>Final Report for Year Three Historical and Cultural Resources Survey of Los Angeles: Sylmar, Watts, Crenshaw, and Vermont/Slauson</i>	1983
Kry, Linda, Marc A. Beherec, and Alec Stevenson	13264	<i>La Cienega Interceptor Sewer Rehabilitation Project, Archaeological Survey Report Los Angeles, California</i>	2014
Kyle, Carolyn E.	07088*	<i>Cultural Resource Assessment for Cingular Wireless Facility Sm 226-01 City of Los Angeles Los Angeles County, California</i>	2002
Lapin, Philippe	05008	<i>Cultural Resource Assessment for Modifications to Pacific Bell Wireless Facility La 281-04, County of Los Angeles, Ca</i>	2000
Lapin, Philippe	05328	<i>Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 225-02, in the County of Los Angeles, California</i>	2000
Loftus, Shannon	11363*	<i>Cultural Resource Records search and Site Survey and Historic Architectural Resource-Inventory and Assessment - AT&T Site: EL0417-8 9268 West 3rd Street, Beverly Hills, Los Angeles County, California 90210 CASPR #3551016878</i>	2011
Loftus, Shannon	11364	<i>Cultural Resource Records Search and Site Survey and Historic Architectural Resource-Inventory and Assessment, AT&T Site: EL0417-9 424 North Maple Drive, Beverly Hills, Los Angeles County, California 90210 CASPR #3551016878</i>	2011
Loftus, Shannon	11369	<i>Cultural Resource Records Search and Site Survey and Historic Architectural Resource-Inventory and Assessment, AT&T Site: EL0456-6</i>	2011
Loftus, Shannon	11376	<i>Cultural Resource Records Search and Site Survey - AT&T Site LAC147, Beverly Hills, 464 North Rexford Drive, Beverly Hills, Los Angeles County, California 90210</i>	2011
Loftus, Shannon	11383	<i>Cultural Resource Records Search and Site Survey and Historic Architectural Resource-Inventory and Assessment - AT&T Site: EL0417-10 8950 Beverly Boulevard, West Hollywood, Los Angeles County, California 90210 CASPR #3551016879</i>	2011
Loftus, Shannon	11431	<i>Cultural Resource Records Search and Site Survey and Historic Architectural Resource-Inventory and Assessment. AT&T Site: EL0459-7 602 North Crescent Drive Beverly Hills, Los Angeles County, California 90210 CASPR#3551016879</i>	2011
Loftus, Shannon	11437	<i>Cultural Resource Records Search and Site Survey and Historic Architectural Resource-Inventory and Assessment. AT&T Site: EL0456-10, 8725 Wilshire Boulevard Beverly Hills, Los Angeles County, California 90211. CASPR#3551016878</i>	2011
Loftus, Shannon	11442	<i>Cultural Resource Records Search and Site Survey and Historic Architectural Resource-Inventory and Assessment. AT&T Site: EL0463-6. West Olympic Boulevard and South Maple Drive Beverly Hills, Los Angeles County, California 90212 CASPR#3551016879</i>	2011
Loftus, Shannon	11445	<i>Cultural Resource Records Search and Site Survey and Historic Architectural Resource-Inventory and Assessment. AT&T Site: EL0463-11. 9001 West Olympic Boulevard Beverly Hills, Los Angeles County, California 90210. CASPR#3551016879</i>	2011
Loftus, Shannon	12522*	<i>AT&T Site: LAC047, C047 Beverly Hills Overlay-C047, 248 North Robertson Boulevard, Beverly Hills, Los Angeles County, CA</i>	2012
Loftus, Shannon	12560	<i>Cultural Resources Records Search and Site Survey AT&T Site EL0462, Wilshire Boulevard, 9301 Wilshire Boulevard Beverly Hills, Los Angeles County, California</i>	2013
McLean, Deborah K.	04198	<i>Archaeological Assessment for Pacific Bell Mobile Services Telecommunications Facility La 573-01, Located at 3560 South La Cienega Boulevard, City and County of Los Angeles, California</i>	1998
Racer, F.H.	11482	<i>Camp Sites in Harbor District</i>	1939
Robinson, Mark	10860	<i>Exposition Corridor Light Rail Transit Project Construction Phase Cultural Resources Monitoring and Treatment Plan</i>	2007
Robinson, R. W.	00501	<i>Cultural Resources Investigation Prepared for Engineering Services Corporation</i>	1977
Rogers, Leslie	11785	<i>Final Environmental Impact Statement/Final Environmental Impact Report for the Westside Subway Extension</i>	2012
Sirro, Adam	05357	<i>Negative Archaeological Survey Report: 07-la-10-15.4/16.25-07-173-023140, Soundwall on Westbound Route 10 From East of Washington Blvd.</i>	2000
Slawson, Dana	10574	<i>Bridge Evaluation Report: Exposition Boulevard Right-of-way Regional Bikeway Project, Los Angeles County, California</i>	1999
Slawson, Dana and John M. Foster	10575	<i>Historic Property Survey Report - Exposition Boulevard Right of way Regional Bikeway Project, Los Angeles County, California</i>	1999
Smith, Philomene C.	04881*	<i>Cold-Planning of 30 Mm of Asphalt Concrete Pavement, Replacing It With Rubberized Asphalt Pavement in #1 Lane on Route 10</i>	2000
Starzak, Richard, Alma Carlisle, Gail Miller,	10887	<i>Historic Property Survey Report for the North Outfall Sewer-East Central Interceptor Sewer, City of Los Angeles, County of Los Angeles, California</i>	2001

Authors	Report No. (LA-)	Title	Year
Catherine Barner, and Jessica Feldman			
Supernowicz, Dana E.	08415	<i>Cultural Resources Study of the Ionic Building Project, Royal Street Communications Site No. La0378b, 1122 S. La Cienega Boulevard, Los Angeles, Los Angeles County, California 90035</i>	2007
Treffers, Steven	12335	<i>Historic Evaluation for 1514 Bedford Street, City and County of Los Angeles, California</i>	2013
Unknown	10568	<i>City of West Hollywood Historic Resources Survey 1986-1987 Final Report</i>	1987
Unknown	11005*	<i>Westside Subway Extension Historic Property Survey Report and Cultural Resources Technical Report</i>	2010
Unknown	11973	<i>Crenshaw/LAX Transit Corridor Project Final Environmental Impact Report/Final Environmental Impact Statement</i>	2011
Watson, Tracy	12519	<i>McDonald's Restaurant No.876 Wireless Antenna Indoor Installation 5930 West Pico Boulevard Los Angeles, Los Angeles County, California</i>	2012
Wlodarski, Robert J.	02838	<i>Results of a Phase 1 Archaeological Study for the Proposed East Central Interceptor Sewer Project, East-west Alignment, Los Angeles County, California</i>	1993

*Indicates study overlaps proposed project

Previously Recorded Cultural Resources

The records search results indicate that 23 cultural resources have been identified within the proposed project records search area (**Table 1**). 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 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). These resources are described in the following paragraphs. A

TABLE 2
PREVIOUSLY RECORDED CULTURAL RESOURCES

Primary No (P-19-)	Permanent Trinomial (CA-LAN-)	Other Identifier	Description	Date Recorded	Distance from Project/Within La Brea Subarea	NRHP/CRHR Eligibility
170398	-	2345 Orange Drive	Historic architectural resources: residence constructed in 1918	Not stated	Within La Brea Subarea	Not evaluated
170399	-	Cienega Elementary School	Historic architectural resource: elementary school constructed in 1940	Not stated	Within La Brea Subarea	Not evaluated
170400	-	2838 Orange Drive	Historic architectural resources: residence constructed in 1905	Not stated	Within La Brea Subarea	Not evaluated
175248	-	Los Angeles Center for Enriched Studies	Historic architectural district: multiple buildings associated with Los Angeles Center for Enriched Studies constructed in 1939	1995	0.12 miles	NRHP and CRHR eligible
176946	-	Payne Furnace & Supply Co	Historic architectural resource: industrial building constructed in 1925	1986	180 feet	Appears eligible for NRHP

177314	-	Regina Theater	Historic architectural resource: theater constructed in 1938	2010	225 feet	Appears eligible for NRHP
177330	-	CHL No.665	California Historic Landmark: plaque commemorating Portola Camp Site	1979	175 feet	Not eligible
187281	-	Salvage Street Maintenance Bldg	Historic architectural resource: public utility building constructed in 1948	1999	50 feet	Determined NRHP ineligible
187282	-	Service Vehicle & Maintenance Bldg	Historic architectural resource: public utility building constructed in 1948	1999	50 feet	Determined NRHP ineligible
187283	-	-	Historic architectural resource: public utility building constructed in 1924	1999	60 feet	Determined NRHP ineligible
187322	-	The Stadium Theater	Historic architectural resource: theater constructed in 1930	2003	0.25 miles	Appears eligible for NRHP
187459	-	LADWP Western District Headquarters	Historic architectural resource: commercial building constructed in 1947	2003	0.21 miles	Not evaluated
187849	-	3809 61st Street	Historic architectural resources: residence constructed in 1925	2001	Within La Brea Subarea	Recommended not eligible
189803	-	-	Historic architectural resource: wooden utility pole constructed prior to 1966	2011	30 feet	Determined NRHP ineligible
190145	-	Newton Building	Historic architectural resource: commercial building constructed in 1940	2012	Within La Brea Subarea	Determined NRHP ineligible
190565	-	-	Historic architectural resource: multiple family building constructed in 1930	2013	0.10 miles	Recommended not eligible

Resource Descriptions

P-19-187281 (Salvage Street Maintenance Building)

Resource P-19-187281 is a historic architectural resource consisting of a public utility building constructed in 1948 (SCCIC, 2019a). The resource has been previously evaluated and determined ineligible for listing in the NRHP (Status Code 6Y), but does not appear to have been evaluated for listing in the CRHR. The mapped location of the building is within 50 feet of the proposed transmission main segment on West 3rd Street. A review of Google Earth and confirmed during the survey indicates the building was demolished sometime after 2005 and is no longer present. Therefore, this resource is not considered further in this report.

P-19-187282 (Service Vehicle & Maintenance Building)

Resource P-19-187282 is a historic architectural resource consisting of a public utility building constructed in 1948 (SCCIC, 2019b). The resource has been previously evaluated and determined ineligible for listing in the NRHP (Status Code 6Y), but does not appear to have been evaluated for listing in the CRHR. The mapped location of the building is within 50 feet of the proposed transmission main segment on West 3rd Street. A review of Google Earth and confirmed during the survey indicates the building was demolished sometime after 2005 and is no longer present. Therefore, this resource is not considered further in this report.

P-19-187283 (Public Utility Building)

Resource P-19-187283 is a historic architectural resource consisting of a public utility building constructed in 1924 (SCCIC, 2019c). The resource has been previously evaluated and determined

ineligible for listing in the NRHP (Status Code 6Y), but does not appear to have been evaluated for listing in the CRHR. The mapped location of the building is within 60 feet of the proposed transmission main's northern terminus. A review of Google Earth and confirmed during the survey indicates the building was demolished sometime after 2002 and is no longer present. Therefore, this resource is not considered further in this report.

P-19-189803 (Wooden Utility Pole)

Resource P-19-189803 is a historic architectural resource consisting of a wooden utility pole constructed sometime prior to 1966 (Loftus, 2011), and meeting the age criteria for a historic resource. The resource has been previously evaluated and determined ineligible for listing in the NRHP (Status Code 6Y), but has not been evaluated for inclusion in the CRHR. The resource is located within 30 feet of the proposed transmission main segment on West 3rd Street.

Sacred Lands File Search

The NAHC maintains a confidential Sacred Lands File (SLF) which contains sites of traditional, cultural, or religious value to the Native American community. The NAHC was contacted on April 10, 2019 to request a search of the 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 (**Appendix B**). The City is conducting consultation with appropriate tribes per the requirements AB 52, and the results of this consultation will be summarized in the IS/MND. During consultation for AB 52, the Tribe expressed concern about the high sensitivity of the project alignment.

Historic Maps and Aerial Photographs

Historic maps and aerial photographs were examined to provide historical information about land uses of the proposed project area and to contribute to an assessment of the proposed project's archaeological sensitivity. Available topographic maps include the 1894 and 1900 Los Angeles 30-minute quadrangles, the 1896, 1898, 1902, and 1921 Santa Monica 30-minute quadrangles, the 1924 and 1926 Hollywood 7.5-minute quadrangles, and the 1950 and 1965 Beverly Hills 7.5-minute quadrangles. Sanborn Fire Insurance maps were available for the years 1927 and 1950. Historic aerial photographs were available for the years 1938, 1947, 1953, 1964, 1972, 1989, 1994, 2002, and 2014 (historicaerials.com, 2019).

The 1894, 1896, 1898, 1900, and 1902 maps show little development within the proposed project aside from north-south and east-west oriented roads that bisect the pipeline alignments at various points. A number of swamplands and two tributary of Ballona Creek are depicted in the immediate vicinity of the proposed project. The 1921, 1924, and 1926 maps show the northern half of the proposed project has been developed and is largely comprised of north-south and east-west oriented streets lined with buildings. The Santa Monica via Beverly Hills/Sawtelle Line of the Pacific Electric railway bisects the pipeline alignment near Burton Way in the northern portion of the proposed project. The southern half remains largely undeveloped. The 1955 and 1965 maps show the entirety of the proposed project is developed with north-south and east-west oriented streets. The Pacific Electric railway is no longer depicted bisecting the proposed project.

The Sanborn Fire Insurance Maps largely indicate what is depicted by the historic aerial: that the proposed project area is largely comprised of north-south and east-west oriented streets lined with residential buildings. The maps indicate that the northern terminus of the pipeline alignment was located in the vicinity of a lumber yard, an ice house, and bakery, and that segments of the Pacific Electric railway bisect the present-day streets in which the pipeline alignments would be installed. A large creamery is depicted east of where the proposed pipeline would cross West 18th Street on La Cienega. A residence is depicted at 1956 Chariton Street, where Well No. 1 would be installed, as early as 1927.

The historic aerial photographs indicate that much of the proposed project was developed with residential streets by 1947. The aerials indicate that the larger buildings adjacent to the proposed project area such as the lumber yard, bakery, ice house, and creamery depicted in the Sanborn maps were demolished at various times and new buildings constructed. The 2002 and 2014 aerial photographs indicate that many of the buildings at the northern terminus of the pipeline alignment were demolished and replaced with the buildings that presently occupy the northern portion of 3rd Street. The 1938 shows the residence at 1956 Chariton Street where Well No. 1 would be installed.

Building Permits

Production Well No. 1 located at 1956 Chariton Street is the only above ground proposed project component that would directly impact a historic architectural resource. Therefore, building permits from the City of Los Angeles's Division of Building and Safety were reviewed to determine the ownership and construction history of the building that could be impacted by well installation (**Table 3**). The first permits on file were the original building permits for the Chariton Street property, which includes both a residence and garage building. These original permits were issued on April 13, 1929 to Timothy R. Kerr. The residence, which was executed in the Spanish Colonial Revival style, was a simple rectangular shape in plan. A permit was also issued at the same time for the construction of a garage, which was square in plan and measured 18 feet by 18 feet. A little more than twenty years after the residence's original construction, a permit was issued on April 5, 1951 for a 12 foot by 17-foot bedroom addition to the rear of the property, flush with the north (side) elevation of the primary residence. A patio roof measuring 14 feet by 14 feet was constructed at the rear of the building and south of the bedroom addition. On September 3, 1982, a permit was issued for another addition measuring 8 feet by 8 feet just south of the location of the previous bedroom addition and where the patio roof was located. This second addition to the building is set back from the south (side) elevation of the primary residence. Other, minor alterations to the residence include the repair of a chimney in 1994 and the re-roofing of the building in 2005.

TABLE 3
CITY OF LOS ANGELES BUILDING PERMITS FOR 1956 CHARITON STREET

Issued	Permit#	Owner	Contractor	Architect	Valuation	Description
4/13/1929	10037	Timothy R. Kerr	Owner	Owner	\$2,500	Construction of a new five room residence measuring 34'x28' and 14 feet tall.
4/13/1929	10028	Timothy R. Kerr	Owner	Owner	\$743	Construction of a garage measuring 18'x18' and 10' tall.
4/5/1951	1597	Mr. and Mrs. Hatton	Illegible	-	1,400	Addition to the rear (east) elevation of the building measuring 12'x17' consisting of a bedroom
8/27/1951	LA13359	Mr. and Mrs. Hatton	L.O. Bergum	-	\$250	Construction of a patio roof measuring 14'x14'
9/3/1982	LA49352	Adams	'	'	\$3,200	Addition to bathroom, located at the rear of the property, south of the previous addition, and set back from the south (side) façade. Measures 8'x8'
11/28/1994	LA33826	Alcuen Adams	-	-	\$2,000	Repair EQ damaged chimney per LA City
7/22/2005	05016-30000-15029	Robert A. and Laura M. Adams	Estrada J.C. Roofing Inc.	-	\$4,500	Re-roof with class "a" materials. 16 squares. Tear off existing roofing. Built up roof/hot mop (max 1 overlay total)

Cultural Resources Survey

Methods

A cultural resources survey of the proposed project area was conducted on April 24, 2019 by ESA staff Sara Dietler, B.A., and Hanna Winzenried, M.Sc. The survey was aimed at identifying

archaeological resources within the proposed project area including the Well Site, and along the Proposed Rehabilitation and Proposed Transmission Main routes. Historic architectural survey focused on the documentation of the building at the Well Site (1956 Chariton Street) and the immediate surroundings. Because the remainder of the project area will include subterranean components, it was not surveyed for historic architectural resources. All resources meeting the OHP's 45-year age threshold were documented on California Department of Parks and Recreation (DPR) 523 forms (**Appendix C**).

Results

The entirety of the proposed pipeline alignment and rehabilitation is within city streets (**Figure 13 through 15**), surrounded by residential and business development. A windshield survey of the alignment was conducted with periodic inspections of visible ground surfaces adjacent to the roads with landscaping and any ground visibility. The Chariton property was subject to a reconnaissance-level survey and the landscaped surfaces were intensively inspected for the presence of archaeological materials. No archaeological resources were identified as a result of the survey.



SOURCE : ESA, 2019

Beverly Hills MND Groundwater Well and Pipeline Project/190167.00

Figure 13

View of northern portion of the proposed transmission main alignment on West 3rd Street
(view facing east)



SOURCE : ESA, 2019

Beverly Hills MND Groundwater Well and Pipeline Project/190167.00

Figure 14

View of southern portion of the proposed rehabilitation alignment on La Cienega Boulevard at Pico Boulevard (view facing south)



SOURCE : ESA, 2019

Beverly Hills MND Groundwater Well and Pipeline Project/190167.00

Figure 15

View of southern terminus of the proposed rehabilitation alignment on La Cienega Boulevard at the 10 Freeway overpass (view facing south)

Resource Descriptions

Previously Recorded Resources

P-19-189803 (Wooden Utility Pole)

Resource P-19-189803 is a historic architectural resource consisting of a wooden utility pole constructed sometime prior to 1966. The resource was visited during the survey and was found to match previous descriptions. The resource has been previously evaluated and determined ineligible for listing in the NRHP (NRHP Status Code 6Y), but has not been evaluated for inclusion in the CRHR or local listing. The resource is located within 30 feet of the proposed transmission main segment located on 3rd Street.

Newly Recorded Resources

1956 Chariton Street

Architectural Description

1956 Chariton Street (APN 4302-033-273) is a residential building and is a modest example of the Spanish Colonial Revival style of architecture (**Figure 16**). The garage outbuilding that was originally constructed to the rear of the property is no longer extant. 1956 Chariton Street features a rectangular footprint constructed on a concrete foundation. The building has a flat roof, and it is clad in stucco.



SOURCE : ESA, 2019

Beverly Hills MND Groundwater Well and Pipeline Project/190167.00

Figure 16
View of the Primary (west) elevation of 1956 Chariton (view facing west)

Primary Elevation (west)

The residence's primary (west) elevation faces Chariton Street. The front façade of the residence is C-shaped with two projecting wings, the northernmost one features a parapet roof, and the southernmost one has a street-facing gabled roof. On the parapet wing, there are three rounded decorative windows with security bars (alteration). On the south side of the parapet wing is the entrance porch with stucco arches and a shed roof. The front door is non-original. To the south of the door is a large three-paned fixed wood window. A stucco wall partially encloses a patio between the projecting wings. The projecting wing with the street-facing gabled roof (the south wing) has a vinyl hung window with security bars (alteration) (**Figure 17**).



SOURCE : ESA, 2019

Beverly Hills MND Groundwater Well and Pipeline Project/190167.00

Figure 17

View of the primary (west) elevation (view facing east)

Side Elevation (south)

The side (south) elevation has four windows, one in the rear entry patio, and three on the side elevation. The window by the rear entrance door is a non-original sliding window (alteration). On the side elevation, the easternmost window is a wood casement window with true-divided lites. West of that is a sliding aluminum window (alteration), and the last window on the south elevation is an aluminum sliding window (alteration) (**Figure 18**).



SOURCE : ESA, 2019

Beverly Hills MND Groundwater Well and Pipeline Project/190167.00

Figure 18

View of the south (side) elevation of the residence (view facing northwest)

Rear Elevation (east)

The residence's rear (east) elevation has two additions and a non-original patio roof (alterations). There is a large addition on the north half with wood clearstory sliding windows. On the addition's south elevation there is a rear entrance patio with a non-original door. A smaller bathroom addition is built south of the larger addition. To the south of that is a jalousie window (alteration) (**Figure 18**).



SOURCE : ESA, 2019

Beverly Hills MND Groundwater Well and Pipeline Project/190167.00

Figure 19
Rear (east) elevation of the residence (view facing west)

Side Elevation (north)

The residence's north (side) elevation is largely obscured, due to its close proximity to the neighboring residence. Therefore, observations of the features that define it were made from the interior of the residence, rather than from the exterior. Based upon these observations from the interior, there are two wood casement windows located on the west half of the north elevation, and a vinyl hung window to the west (alteration) (**Figure 20**).



—Beverly Hills MND Groundwater Well and Pipeline Project/190167.00
SOURCE : ESA, 2019

Figure 20

Wood casement windows on the north (side) elevation, as viewed from the interior (view facing north)

Interior

The interior of the structure has been altered. However, the main entrance hall and living room have the curved shape of the ceiling, original wood floors, trim, and fireplace, windows, and archways (**Figure 21**).



—Beverly Hills MND Groundwater Well and Pipeline Project/190167.00
SOURCE : ESA, 2019

Figure 21

Interior view of the living room (view facing west)

Occupancy and Ownership History

City directories and building permits on file with the City's Building Division, as well as the County Assessor, U. S. Census, and other records, were reviewed to determine if the subject property has any significant associations with the productive lives of historic personages. **Table 4** below summarizes the occupancy and ownership history of 19566 Chariton Street.

TABLE 4
OWNER/OCCUPANCY HISTORY FOR 1956 CHARITON STREET

Year	Source	Owner/Occupant
1929	Building Permit	Timothy R. Kerr
1942	Los Angeles Directory Co.	Leslie Mellor
1951	Building Permits	Mr. and Mrs. Hatton

Year	Source	Owner/Occupant
1953-1956	R.L. Polk & Co. Voter Registration Pacific Telephone	Roger L. Holtan Irene Holtan
1980	Pacific Telephone	Sceka Abubakri
1982-1994	Building Permits	Alcuen Adams
1985	Pacific Bell	Eric S. Bross
2005	Building Permits	Robert A Adams Laura M. Adams
2006	Haines Co., Inc.	Junald Bavani

Significance Findings

Two historic architectural resources have been identified within or immediately adjacent to the proposed project and include an 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, ESA recommends 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

As previously described, 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).

Criterion 1: Events

The subject property is located in Tract 1250 in the West Adams Community Planning Area, and this tract was a medium-sized subdivision first established in 1911. Significant development in the neighborhood primarily included single-family residential construction. However, there was also with some additional commercial development along South La Cienega Boulevard that was built to serve the neighborhood. This tract is one of many developed throughout West Adams in

the early 20th century. Additionally, the primary residence was constructed in 1929 which was roughly around the time the rest of the tract was developed. West Adams-Baldwin Hills-Leimert Community Plan Area (CPA) is largely comprised of single-family residential neighborhoods such as the neighborhood that 1956 Chariton Street is located within. However, Tract 1250 is not a tract with excellent examples of architectural styles, nor is it a significant example of streetcar-related development. Furthermore, the neighborhood was not developed by any significant individuals such as Elwain Steinkamp or Walter Leimert. 1956 Chariton Street is an example of a relatively early single-family residence, as it was developed in 1929. However, it is not a rare remaining example of the earliest periods of residential development in the area. Therefore, while 1956 Chariton Street is an example of the development patterns of the neighborhood, it does not appear to have made a significant contribution to the settlement patterns of the area as it is not unique or precedent-setting in any way. Additional research on 1956 Chariton Street did not reveal any significant events associated with either the primary residence or the (now-demolished) garage buildings. Moreover, 1956 Chariton Street was not found to be historically significant in SurveyLA's survey of West Adams-Baldwin Hills-Leimert, which was conducted in 2016, and ESA concurs with the survey's findings. As a result, 1956 Chariton Street does not appear to meet the eligibility requirements as either an individual resource or a contributor to a district under CRHR Criterion 1, or Los Angeles Historic-Cultural Monument Criterion 1.

Criterion 2: Significant Persons

The occupancy and ownership history for the subject property was researched by reviewing City of Los Angeles directories, building permits, Los Angeles County Assessor records, and the U. S. Census. Archival research did not reveal any significant persons associated with the property. Therefore, 1956 Chariton Street does not appear to be associated with significant personages or events in order to meet the eligibility requirements as either an individual resource or a contributor to a district under CRHR Criterion 2, or Los Angeles Historic-Cultural Monument Criterion 2.

Criterion 3: Design/Construction

The residence is a modest example of a Spanish Colonial Revival style single-family residence. It has some of the character-defining features such as asymmetrical facades, stucco siding, tile trim, and arched openings. However, it does not have higher design elements such as distinctive capped chimneys, or towers used as vertical accents. Further, the building has been altered with changed window types, including one on the front façade on the south wing, and materials as well as large additions to the rear of the residence and the demolition of the original garage. Further, it was not designed by any architect, let alone a master architect. Therefore, 1956 Chariton Street does not appear to meet the eligibility requirements as either an individual resource or a contributor to a district under CRHR Criterion 3, or Los Angeles Historic-Cultural Monument Criterion 3.

Criterion 4: Data Potential

While most often applied to archaeological districts and sites, Criterion 4 can also apply to buildings, structures, and objects that contain important information. In order for these types of properties to be eligible under Criterion 4, they themselves must be, or must have been, the

principal source of the important information. 1956 Chariton Street does not appear to yield significant information that would expand our current knowledge or theories of design, methods of construction, operation, or other information that is not already known. Therefore, 1956 Chariton Street has not yielded or are not likely to yield information important to prehistory or history and do not appear to satisfy CRHR Criterion 4.

Integrity

The CRHR recognizes a property's integrity through seven aspects or qualities: location, design, setting, materials, workmanship, feeling, and association. Eligible properties should retain several, if not most, of these aspects. Both registers require that a resource retain sufficient integrity to convey its significance, and the property must retain the essential physical features that enable it to convey its historical identity. Integrity is based on significance and understanding why a property is important. *National Register Bulletin 15* states that “only after significance is fully established can you proceed to the issue of integrity” (U.S. Department of the Interior, 2002). Since 1956 Chariton Street was not identified as significant under any of the applicable state criteria, an integrity analysis was not conducted.

Recommendations

As a result of this study, one historic architectural resources, 1956 Chariton Street was identified within the proposed project area. 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.

Prior to project approval, should future wells be added, a review of the record search and other background data on land use shall be reviewed and any areas that were not surveyed as part of this study, should be surveyed by a qualified archaeologist and a qualified architectural historian for the purposes of identifying eligible resources. The survey should identify and evaluate the significance of any potentially eligible resources that may be directly or indirectly impacted by the proposed project, and should be documented in an addendum technical report. Any eligible resources identified in newly surveyed areas should be avoided, where feasible, and appropriate treatment and mitigation procedures implemented where avoidance is not possible.

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 No. 1. 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 Well No. 1 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 Tribe 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.

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.

Mitigation Measure 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 Well No. 1. 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.

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.

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APPENDIX A

Personnel



Monica Strauss, RPA

Director, Southern California
Cultural Resources Group

EDUCATION

MA, Archaeology,
California State
University, Northridge

BA, Anthropology,
California State
University, Northridge

AA, Humanities, Los
Angeles Pierce College

22 YEARS OF EXPERIENCE

SPECIALIZED EXPERIENCE

Treatment of Historic
and Prehistoric Human
Remains

Archaeological
Monitoring

Complex Shell Midden
Sites

Groundstone Analysis

PROFESSIONAL AFFILIATIONS

Register of Professional
Archaeologists (RPA),
#12805

Society for California
Archaeology (SCA)

Society for American
Archaeology (SAA)

QUALIFICATIONS

Exceeds Secretary of
Interior Standards

CA State BLM Permitted

Monica provides senior oversight to a multi-disciplinary team of cultural resources specialists throughout Southern California, including archaeologists, architectural historians, historians, and paleontologists. During her 22 years of practice, Monica has successfully directed hundreds of cultural resources projects meeting local, state, and/or federal regulatory requirements. Monica's strength lies in assisting clients in navigating complex cultural resources issues in the contexts of the California Environmental Quality Act (CEQA), the National Environmental Policy Act (NEPA), and Section 106 of the National Historic Preservation Act (NHPA). Monica's experience ranges from large infrastructure projects that are controversial and multi-jurisdictional to smaller development projects that are important to local agencies and stakeholders. She has excellent experience working with agencies to develop creative mitigation to address challenging cultural resources impacts. She directs a staff who conduct Phase 1 archaeological/ paleontological and historic architectural surveys, construction monitoring, Native American outreach, archaeological testing and treatment, historic resource significance evaluations, and large-scale data recovery programs. Monica is expert in the area of Assembly Bill 52 and routinely provides training to her clients as well as being a workshop content author and session presenter for the Association of Environmental Professionals on the topic.

Relevant Experience

County of Los Angeles, Department of Public Works, Arroyo Seco Bike Path Phase I Cultural Resources Evaluation, Los Angeles, CA. Project Director.

Working for the County of Los Angeles, Department of Public Works in connection with a project to make improvements to the Arroyo Seco Channel, Monica managed all aspects of Section 106 review in accordance with Caltrans Cultural Resources Environmental guidelines. Monica and her team evaluated the Arroyo Seco Channel, identified character-defining features, informed the design of channel improvements to retain such features, and addressed the channels' potential for eligibility as part of a larger Los Angeles County water management district. She developed the research strategy, directed the field teams, and prepared cultural resources assessment documentation for approval by Caltrans and FHWA, as well as the cultural resources section for a Mitigated Negative Declaration.

Los Angeles Department of Water and Power (LADWP) Foothill Trunk Line Project. City of Los Angeles, CA. Cultural Resources Senior Reviewer. ESA

archaeologists have prepared a Phase I cultural resources study and EIR cultural resources section for the Los Angeles Department of Water and Power (LADWP) Trunk Line Project, located in the City of Los Angeles, CA. The proposed project includes the replacement of 16,600 feet of existing 24-inch-, 26-inch-, and 36-inch-

diameter welded steel pipe and 30-inch-diameter riveted steel pipe with a 54-inch-diameter welded steel pipe along Foothill Boulevard within the districts of Pacoima and Sylmar. Monica served as the Senior Reviewer for the Phase I cultural resources study and EIR section.

Los Angeles Department of Water and Power, Scattergood Olympic Transmission Line Monitoring, Los Angeles County, CA. *Cultural Resources Principal Investigator.* The Los Angeles Department of Water and Power (LADWP) is proposing to construct and operate approximately 11.4 miles of new 230 kilovolt (kv) underground transmission line that would connect the Scattergood Generation Station and Olympic Receiving Station. The project includes monitoring of potential vault location testing. Monica currently coordinates and provides daily oversight to archaeological, Native American, and paleontological monitors. An Archaeological Resources Monitoring Report and a Paleontological Resources Monitoring Report documenting the monitoring findings will be submitted, together with daily monitoring logs, at the close of the project.

Los Angeles County Waterworks District 40 (LACWWD40) Regional Recycled Water Project, Phase 2, Palmdale, CA. *Cultural Resources Project Director.* ESA was retained by LACWWD40 in 2009 to prepare an Initial Study/Environmental Assessment and cultural resources technical study for Phase 2 of the Regional Recycled Water Project. In 2010 and 2011, Monica directed a team of ESA archaeologists who performed a pedestrian survey of the 5.25 linear mile project area and documented archaeological sites encountered. Nine cultural resources were documented during the survey; however, because the project APE was narrowed after the survey, only four are located within the current project area.

Sweetwater Reservoir, Water Main Replacement, San Diego County, CA. *Cultural Resources Principal Investigator.* ESA was retained by Sweetwater Authority to prepare an IS/MND for the replacement of a 36-inch pipeline leading from Sweetwater Dam. Sweetwater Dam was originally constructed in the late 19th century and was subject to upgrades in 1917. ESA conducted a Phase 1 Cultural Resources Assessment including archival research, pedestrian, survey, historical research, Native American outreach, and the preparation of a technical report documenting archaeological and historic-architectural resources that might be impacted by the project. The study concluded that features that would be altered by the project that were contributing elements to the historic dam would need to be replaced in kind. Monica directed the team of researchers which conducted this work, assisted in evaluating project impacts to the dam, and facilitated in the development of appropriate mitigation.

City of Los Angeles, Department of Water and Power, First Street Trunk Line Monitoring and Assessment, Los Angeles, CA. *Project Director.* As a consultant to the City of Los Angeles Department of Water and Power, Monica directed paleontological and archaeological monitoring of utilities installations on a continuous basis for over one year. She responded to monitoring discoveries including historic-period utility pipes and determined the appropriate mitigation in the form of recordation.



Dr. Jerabek, PhD

Historic Resources Director

EDUCATION

PhD, Art History,
University of California,
Los Angeles

MA, Architectural
History, School of
Architecture, University
of Virginia

Certificate of Historic
Preservation, School of
Architecture, University
of Virginia

B.A., Art History, Oberlin
College

30 YEARS EXPERIENCE

AWARDS

2016 Preservation
Design Award, Home
Savings and Loan
Association Montebello
Branch Interpretive
Exhibit, California
Preservation Foundation

2014 Preservation
Award, The Dunbar
Hotel, L.A. Conservancy

2014 Westside Prize, The
Dunbar Hotel, Westside
Urban Forum,

2014 Design Award:
Tongva Park & Ken
Genser Square, Westside
Urban Forum

2012 California
Preservation Foundation
Award, Queen Mary
Conservation
Management Plan,
California Preservation
Foundation

Dr. Jerabek has 30 years of professional practice in the United States with an extensive background in historic preservation, architectural history, art history and decorative arts, and historical archaeology. She specializes in Visual Art and Culture, 19th-20th Century American Architecture, Modern and Contemporary Architecture, Architectural Theory and Criticism, Urbanism, and Cultural Landscape, and is a regional expert on Southern California architecture. Her qualifications and experience meet and exceed the Secretary of the Interior's Professional Qualification Standards in History, Architectural History, and Archaeology.

Dr. Jerabek has managed and conducted a wide range of technical studies in support of environmental compliance projects, developed preservation and conservation plans, and implemented preservation treatment projects for public and private clients throughout California and the United States. She provides expert assistance with environmental review, from due diligence through planning/design review and permitting and when necessary, implements mitigation and preservation treatment measures. Dr. Jerabek regularly performs assessments to ensure conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties, and assists clients with adaptive reuse/rehabilitation projects by providing preservation design and treatment consultation, agency coordination, legally defensible documentation, construction monitoring and conservation treatment.

As primary investigator and author of hundreds of technical reports, plan review documents, preservation and conservation plans; Historic American Buildings Survey (HABS), Historic American Engineering Record (HAER), Historic American Landscapes Survey (HALS) reports; construction monitoring reports; and salvage reports and relocation plans, she is a highly experienced practitioner and expert in addressing historical resources issues while supporting and balancing project goals. Dr. Jerabek is an expert in the evaluation, management and treatment of historic properties for compliance with Sections 106 and 110 of the National Historic Preservation Act (NHPA), National Environmental Policy Act (NEPA), Section 4(f) of the Department of Transportation Act, California Environmental Quality Act (CEQA), and local ordinances and planning requirements.

**PROFESSIONAL
AFFILIATIONS**California Preservation
FoundationSanta Monica
ConservancySociety of Architectural
Historians, Life MemberAmerican Institute of
Architects (AIA), National
Allied Member

Neutra Institute, Fellow

Cultural Resources Assessment for the Proposed Pasadena Water and Power Recycled Water Project, City of Pasadena, County of Los Angeles, CA. *Project Manager for Historical Resources/Principal Architectural Historian/Cultural Landscape Specialist.* Cultural Resources Investigations for EIS/EIR for proposed construction of recycled water project. Prepared Section 106 Effects Evaluation for undertaking that would result in potential adverse effects to two historic districts, Pasadena Arroyo Parks and Recreation District, and Arroyo Seco Flood Control Channel District. Conducted Secretary of the Interior's Standards plan reviews and provided project design recommendations to reduce potential effects. Project Cost: \$20,970 / End Date: 2012

Mills Act Tax Credit Application, 1210 Coldwater Canyon, Beverly Hills, CA. *Project Manager and Principle Investigator.* ESA prepared a landmark nomination and Mills Act Tax Credit Application for the Rosenstiel Residence, a Mid-Century Modern style single-family residence designed by the architectural firm of Gruen + Krummeck in 1950. As an exceptional example of Mid-century Modern style residential architecture designed by master architect Victor Gruen, the Rosenstiel Residence was designated City of Beverly Hills. Following the designation of the Rosenstiel Residence, ESA provided preservation consultation to usher the client through the Mills Act process. Working with the client's architect and contractor, ESA provided guidance and consultation regarding the required Rehabilitation/Restoration Maintenance Plan's compliance with the Secretary of Interior's Standards for Rehabilitation. ESA worked with the city of Beverly Hills' Community Development Department to ensure all Mills Act materials were filled out appropriately and attend the final site walk and Cultural Heritage Commission hearing where the Rosenstiel Residence was successfully awarded a Mills Act contract in July of 2017.

1228 N. Flores Historic Resources Assessment and Mills Act Tax Credit Application, West Hollywood, CA. *Project Director and Principal Investigator.* ESA conducted a historic resources assessment of a single-family residence located at 1228 North Flores Street in the city of West Hollywood for compliance with CEQA. The proposed project intended to demolish one existing single-family residence for redevelopment of the property site. The property was determined eligible as a contributor to a potential thematic grouping of historic Craftsman residences in the City of West Hollywood. After the property was designated, ESA subsequently prepared a restoration plan and Mills Act application for the property.

603 Doheny Road Landmark Nomination and Mills Act Tax Credit Application, Beverly Hills, CA. *Project Manager and Author.* ESA prepared a Landmark Nomination and Mills Act Tax Credit Application for The William E. Palmer and Liliore Green Palmer Residential Estate, 603 Doheny Road in Beverly Hills, California. Built in 1940, the Regency style estate is the most architecturally significant residence of master builder James F. Dickason in Beverly Hills. Dickason incorporated a pre-existing Canary Pine Forest and natural spring into the project. The property is identified with an important event in local history, creation of the urgency ordinance prohibiting the removal of trees after Merv Griffin sought a permit to remove Canary Pine trees and subdivide the estate. The property embodies the distinctive characteristics and ideals of Regency and Rustic architecture and possesses high artistic values as an example of an interwar-period estate that sought to harmonize with the natural setting. The ESA Mills Act application included maintenance, repair and restoration projects for the residence, pool house, Rustic-style cabin, spring house and Canary Pine



Sara Dietler

Archaeologist

EDUCATION

BA. Anthropology,
San Diego State
University

20 YEARS OF EXPERIENCE

CERTIFICATIONS/ REGISTRATION

California BLM Permit,
Principal Investigator,
Statewide

Nevada BLM Permit,
Paleontology, Field
Agent, Statewide

PROFESSIONAL AFFILIATIONS

Society for American
Archaeology (SAA)

Society for California
Archaeology (SCA)

Sara is a senior archaeology and paleontology lead with 20 years of experience in cultural resources management in Southern California. As a senior project manager, she manages technical studies including archaeological and paleontological assessments and surveys, as well as monitoring and fossil salvage for many clients, including public agencies and private developers. She is a cross-trained paleontological monitor and supervisor, familiar with regulations and guidelines implementing the National Historic Preservation Act (NHPA), National Environmental Policy Act (NEPA), California Environmental Quality Act (CEQA), and the Society of Vertebrate Paleontology guidelines. She has extensive experience providing oversight for long-term monitoring projects throughout the Los Angeles Basin for archaeological, Native American, and paleontological monitoring compliance projects and provides streamlined management for these disciplines.

Relevant Experience

Venice Dual Force Main Project, Venice, CA. *Cultural Resources Lead.* The Venice Dual Force Main Project is an \$88 million sewer force main construction project spanning 2 miles within Venice, Marina del Rey, and Playa del Rey. Contracted to Vadnais Trenchless Services and reporting to the City of Los Angeles, Bureau of Engineering, Environmental Management Group, ESA is serving as the project's environmental resource manager. Sara provides quality control oversight for the archaeological and paleontological mitigation.

Advanced Water Treatment Facility Project Groundwater Reliability Improvement Project, Pico Rivera, CA. *Project Manager.* ESA is providing environmental compliance monitoring for the Water Replenishment District to ensure compliance with the conditions contained in the Mitigation and Monitoring Reporting Programs associated with three environmental documents, including the Final EIR, a Mitigated Negative Declaration, and a Supplemental EIR, pertaining to three infrastructure components associated with the project. ESA provides general compliance monitoring at varying rates of frequency depending on the nature of the activities and is sometimes on-site for 4-hour spot checks and other times for full 24-hour rotations. The project is located near a residential neighborhood and adjacent the San Gabriel River. Issues of concern include noise, vibration, night lighting, biological resources, cultural resources, and air quality. Sara provides quality assurance and oversight of the field monitoring, and day-to-day response to issues. She oversees archaeological and Native American monitoring for ground disturbance and coordinates all sub-consultants for the project. She provides daily, weekly, and quarterly reporting on project compliance to support permitting and agency oversight.

Scattergood Olympic Transmission Line, Los Angeles, CA. *Report Author.* The Los Angeles Department of Water and Power is proposing to construct and operate approximately 11.4 miles of new 230 kilovolt (kv) underground transmission line that would connect the Scattergood Generation Station and Olympic Receiving Station. The project includes monitoring of construction activities occurring in street rights-of-way. Sara is providing final reporting for the long-term monitoring and QA/QC of the field data.

Hansen Dam Golf Course Water Recycling Project, Los Angeles, CA. *Senior Archaeologist and Project Manager.* Sara directed a phase I historical assessment for the Hansen Dam Golf Course Water Recycling Project located in the San Fernando Valley, City of Los Angeles, California. The project included the construction of an outdoor pumping station adjacent to the existing Hansen Tank located at the Los Angeles Department of Water and Power's (LADWP's) Valley Generating Station. In addition, a pipeline or distribution line was planned to be installed from the pumping station to the Hansen Dam Golf Course along the Tujunga Wash. The phase I study of this project included mitigation for the effects of the project on the portion of the golf course falling within the area of potential effects, which was potentially sensitive for buried cultural resources as the result of a complex of World War II housing units placed on the site between the 1940s and the 1960s. Sara conducted consultation with the USACE regarding the project.



Gabrielle Harlan, Ph.D.

Architectural Historian

EDUCATION

Doctor of Philosophy,
History of Art and
Architecture, University
of Virginia

Master of Architectural
History, University of
Virginia

Certificate in Historic
Preservation, University
of Virginia

Bachelor of Architecture,
University of Arizona

20 YEARS OF EXPERIENCE

AWARDS

Andrew Mellon
Foundation Fellowship
Recipient, Huntington
Library, San Marino,
California, 2010

Helen Bing Fellowship
Recipient, Huntington
Library, San Marino,
California, 2010

Du Pont Fellowship
Recipient, University of
Virginia, Charlottesville,
Virginia, 2005

William Rucker Art and
Architecture Fellowship
Recipient and Du Pont
Fellowship Recipient,
University of Virginia,
Charlottesville, Virginia,
2004

Dean's Forum
Fellowship Recipient,
University of Virginia,
Charlottesville, Virginia,
2003

Arizona Women in
Construction
Scholarship Recipient,
University of Arizona,
Tucson, Arizona, 1994

Gabrielle is a senior architectural historian with more than 20 years of academic and professional experience preparing documentation to address the restoration, rehabilitation, and adaptive reuse of historic properties—including historic structures reports, preservation and interpretation plans, and National Register of Historic Places nominations. Gabrielle also has experience contributing to California Environmental Quality Act (CEQA)-level documents. She has worked primarily in California for the last ten years, and she continues to expand upon her knowledge of Southern California history by conducting primary source research and developing historic contexts.

Relevant Experience

Hollywood Burbank Airport Replacement Terminal EIS, Los Angeles County, CA.

Architectural Historian. The Burbank-Glendale-Pasadena Airport Authority (Authority) is proposing to replace the existing passenger terminal to enhance airport safety and meet ADA standards, to consolidate passenger and baggage screening functions, and to provide a new, modern, energy-efficient passenger terminal. The project would replace the existing 14-gate, 232,000-square-foot passenger terminal with a 14-gate passenger terminal that meets current California seismic design and FAA airport design standards. The replacement passenger terminal would be developed in accordance with modern design standards to provide enhanced passenger amenities; security screening facilities that meet the latest TSA requirements; and other airport facilities (including holdrooms, baggage claim areas, and public areas) that are designed and sized for the kinds of aircraft the airlines routinely operate. Gabrielle is the architectural historian for the project, and is providing peer review of historic resources reports to ensure they meet Section 106 requirements. She will also co-author the cultural resources section of the EIS, and analyze effects to historic architectural resources.

Pasadena Rose Bowl Lighting Replacement Project, Pasadena, CA.

Architectural Historian. The Rose Bowl Operating Company, the concessioner of a City of Pasadena-owned property, is proposing to replace the exterior pole-mounted lighting at the site, which is a National Historic Landmark listed on the National Register of Historic Places. The proposed project would modernize and improve the existing lighting at the Rose Bowl Stadium by replacing existing tower light fixtures with new modern fixtures. The overall purpose is to enhance the quality of lighting for events consistent with other stadiums, to improve the viewing experience, and to increase efficiency. In order to facilitate a successful project that would maintain the integrity of the historical resource, ESA prepared a technical memorandum analyzing the project for its conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties. The technical memorandum provided documentation in support of an application for

a categorical exemption under the California Environmental Quality Act (CEQA). Gabrielle conducted a site survey and prepared the technical memorandum.

Long Beach Landmark List Analysis, Long Beach, CA. Architectural Historian.

The City of Long Beach requested that ESA work with its list of locally-designated properties in order to ascertain which properties might be good candidates for both listing on the National Register of Historic Places and potential rehabilitation tax-credits. This effort encompasses an initial research effort to identify which local landmarks are already listed or determined eligible to the National Register of Historic Places, which ones are listed on the California Register, and which properties have previously been surveyed and assigned historical resource status codes that indicate that they are good candidates for listing. Subsequent to this initial effort, further research is being undertaken to identify the historic contexts and criteria under which potential candidates are likely eligible for listing. The intent of this research and inventory effort is so that the City of Long Beach has the necessary information at its disposal to better encourage the full utilization of the federal government's historic tax-credit incentives program for historic preservation projects within the community. Gabrielle developed the research approach and is supervising others in the completion of the research efforts.

Historical Resource Assessment for Mariners' Medical Arts Building, Newport Beach, CA. Architectural Historian. This project for the City of Newport Beach established the historic significance of a medical office building complex designed by architect Richard Neutra in the early 1960s. Gabrielle was responsible for writing the historic context and a majority of the historic research effort, as well as for directing and supervising junior staff in archival research tasks and the production of the final document.

Victor Clothing Company Building, Los Angeles, CA. Architectural Historian. The project was to assist the owner of an early twentieth-century commercial mid-rise building located in downtown Los Angeles in developing a successful approach for historic restoration of the facade and interior commercial space and elevator lobby in order to comply with the terms of a federal tax-credit. Gabrielle's responsibilities as project manager were to gather and analyze research, to coordinate the work of sub-consultants, to consult with the California Office of Historic Preservation and to prepare the required documentation for the tax-credit application.

Hollywood Historic Resources Survey for the Los Angeles Community Redevelopment Agency, Los Angeles, CA. Architectural Historian. This project was to survey potential historic resources in Hollywood and to prepare multiple historic context statements for the various property types. These ranged from large industrial film and music studios to religious facilities and civic institutions to small-scale domestic architecture. Gabrielle's primary responsibility on the project was to research and write the majority of the historic context statements, and to oversee the preparation of historic context statements by other staff. She also participated as a member of the survey team and trained junior staff on inventory methods.



Michael Vader

Senior Associate

EDUCATION

BA, Physical Anthropology, University of California, Santa Barbara

M.A., Applied Archaeology (In Progress), California State University San Bernardino

13 YEARS OF EXPERIENCE

PROFESSIONAL AFFILIATIONS

Society for California Archaeology (SCA)

Society for American Archaeology (SAA)

Pacific Coast Archaeological Society (PCAS)

SPECIALIZED EXPERIENCE

Analysis of faunal remains including fish and shellfish species

Archaeological Monitoring

Paleontological Monitoring

Environmental Compliance Monitoring

Human osteology and bioarchaeology

Michael is cultural resources specialist with experience working on survey, data recovery, and monitoring projects. Michael has experience with project management, has led crews on multiple surveys and excavations, and is familiar with environmental compliance documents. He has worked on a variety of energy and water infrastructure projects throughout California, including projects in Riverside, San Diego, Imperial, San Bernardino, Los Angeles, Orange, Santa Barbara, San Luis Obispo, Kern, Fresno, Madera, and Inyo Counties, as well as in Clark County Nevada. Michael regularly works as part of a team, coordinating with field staff and agency leads.

Relevant Experience

Ventura Water Supply Projects, Ventura County, CA. *Project Manager.* The City of San Buenaventura (City) Water and Wastewater Department (Ventura Water) retained Environmental Science Associates to conduct a cultural resources assessment for the proposed Ventura Water Supply Projects in support of an Environmental Impact Report. The City is proposing to develop reliable potable water supplies for the population of the Ventura Water service area while at the same time complying with the Consent Decree among the City, Wishtoyo Foundation/Ventura Coastkeeper, and Heal the Bay. Michael managed cultural resources staff, led the survey, and authored the cultural resources assessment report.

San Jacinto Valley Raw Water Facilities Project - Cultural Resources Assessment, Riverside County, CA. *Archaeologist.* The Eastern Municipal Water District (EMWD) retained Environmental Science Associates to conduct a cultural resources assessment for the San Jacinto Valley Raw Water Conveyance Facilities Project in support of an Initial Study/Mitigated Negative Declaration. The Project would provide a water conveyance system to work in conjunction with EMWD's existing facilities, providing additional groundwater recharge and banking capacity. Michael conducted the cultural resources survey and co-authored the cultural resources assessment report.

Sterling Natural Resource Center Project, Highland, CA. *Archaeologist.* The San Bernardino Valley Municipal Water District retained ESA to prepare a Phase I Cultural Resources Study in support of an Environmental Impact Report for the proposed Sterling Natural Resource Center Project. The project includes the construction a new treatment facility in the City of Highland to treat locally generated wastewater for beneficial reuse in the upper Santa Ana River watershed. Michael led the Phase I survey of the project area and assisted in the preparation of the cultural resources study.

City of Escondido MFRO Facility for Agriculture Project, Escondido, CA. *Archaeologist.* The City of Escondido retained ESA to prepare an ISMND for the

proposed Micro Filtration Reverse Osmosis Facility (MFRO Facility) for Agriculture Project .The Project includes the construction of an MFRO Facility, to provide advanced treatment for Title 22 quality reuse water. In support of the ISMND, ESA conducted a Phase I cultural resources study that complied with CEQA-Plus guidelines. Michael conducted the Phase I survey of the project area, and prepared the Phase I cultural resources study and IS/MND.

Richard A. Reynolds Desalination Plant Phase 2 Expansion - Cultural Resources, San Diego, CA. *Archaeologist.* ESA was contracted by the Sweetwater Authority to perform a cultural resources study for the Phase 2 Expansion at the Richard A. Reynolds Desalination Plant. The expansion would increase the desalinated potable water production at the desalination plant from its current 5 million gallons per day (mgd) capacity to 10 mgd. The project requires funding from the United States Bureau of Reclamation (BOR), making it subject to Section 106 of the National Historic Preservation Act. Michael conducted the cultural resources survey, coordinated with the BOR archaeologist, and prepared the cultural resources study for the expansion.

City of Los Angeles Department of Water and Power, City Trunk Line Unit 3 Project, Los Angeles, CA. *Archaeologist.* ESA has conducted a Phase 1 cultural resources assessment for the Los Angeles Department of Water and Power (LADWP), City Trunk Line Unit 3 Project. LADWP plans replacing a portion of the City Trunk Line on Coldwater Canyon Avenue between Vanowen Street and Magnolia Boulevard, within the City of Los Angeles. The proposed Project would involve the installation of approximately 10,250 linear feet of 60-inch diameter water pipeline constructed of welded steel. Michael led the Phase 1 cultural resources survey of the Project area and prepared the technical report and the cultural resources ISMND section.

City of Los Angeles Department of Water and Power, Foothill Trunk Line Project, Los Angeles, CA. *Archaeologist.* ESA was retained by the Los Angeles Department of Water and Power (LADWP) to conduct a Phase 1 cultural resources study for the Foothill Trunk Line Project. LADWP proposes to replace 16,600 feet of existing 24-inch, 26-inch, and 36-inch diameter welded steel pipe and 30-inch diameter riveted steel pipe with a 54-inch diameter welded steel pipe along Foothill Boulevard within the districts of Pacoima and Sylmar, in the City of Los Angeles. Michael prepared the Phase 1 technical report for the Project.



Hanna Winzenried

Architectural Historian

EDUCATION

MSc Historic Conservation, Oxford Brookes University

BA, European Studies, Brigham Young University

3 YEARS OF EXPERIENCE

PROFESSIONAL AFFILIATIONS

The Society for the Protection of Ancient Buildings

Historic England

National Trust for Places of Historic Interest or Natural Beauty

Hanna is an architectural historian with 3 years of academic and professional experience performing building conservation, historic research, and field surveys and conducting plan reviews for conformance with local regulations and ordinances. Prior to joining ESA, she has 1.5 years of experience with the City of Los Angeles, Department of Planning, in the Office of Historic Resources Historic Preservation Overlay Zones (HPOZ) Unit. Her experience and education both in California and abroad have given her a wide set of interdisciplinary skills, including strong technical and research skills.

Relevant Experience

9120 W. Olympic Boulevard Preliminary Assessment and Character Defining Features Analysis for the Harkham Hillel Hebrew Academy, Beverly Hills, CA.

Contributor. ESA prepared a Phase I Historic Resources Assessment for the modernist educational building at 9120 W. Olympic Boulevard. The purpose of the report is to identify and evaluate potential historic resources. The subject property was built in 1963 as the largest Jewish day school. It was built in the Modernist architectural style by the renowned architect Sydney Eisenshtate. The Academy enrollment has outgrown the existing space, and the school is looking for a way to expand its square footage. Hanna performed research and prepared of the reports.

Universal Hilton Environmental Impacts Report and Historic Resources Technical Report for 555 W Universal Terrace Parkway, Los Angeles, CA.

Contributor. ESA prepared an Environmental Impacts Report including a Historic Resources Technical Report. The Universal Hilton Hotel was designed by master architect, William L. Pereira in 1983 in the postmodern style. The hotel was designed to accommodate visitors to the Universal Theme Parks. The hotel management wants to expand the number of rooms by building a large addition. Hanna performed research and assisted in the preparation of the report.

361 Myrtle Street Peer Review Letter for the residence at 361 Myrtle Street, Glendale, CA. *Contributor.* ESA prepared a peer review letter to conduct a peer review of previous historic resource evaluations and analyze potential cumulative impacts of the demolition for the property at 361 Myrtle Street. Previous evaluations and the impact of demolishing the residence were reviewed and analyzed. Hanna performed research and assisted with the preparation of the report.

Nestor Way Affordable Housing Project Historical Resources Technical Report, San Diego, CA.

Contributor. ESA prepared a Historical Resources Technical Report for 1120 and 1130 Nestor Way on behalf of the Federal Housing Administration. The site is improved with a Methodist church built in 1896 in the Gothic Revival architectural style and multiple ancillary buildings. The City of San

Diego is planning on constructing permanent supportive housing containing 100 units, consisting of multi-family affordable housing for formerly homeless seniors 55 years of age and older. Hanna performed research and assisted with the preparation of the reports.

Nelles School Site Redevelopment, Whittier, CA. *Contributor.* ESA oversaw the documentation and architectural salvage of the Fred C. Nelles School. Brookfield Residential plans on redeveloping the whole site into a residential neighborhood while maintaining four historically significant structures. Hanna helped draft a documentation and architectural features salvage plan according to the character defining features list and oversaw the deconstruction of the other school buildings to ensure the architectural features were salvaged correctly.

Riverside Cement Company, Crestmore Plant HAER, Jurupa Valley, CA. *Contributor.* ESA prepared two Historic American Engineering Records for the Crestmore Plant for the White Cement Mill and for the Stock House. The Riverside Cement Company, Crestmore Plant was a former cement plant that was initially constructed in 1909, although went through multiple periods of alteration. Developers proposed an industrial and open space development at the facility. Hanna helped drafts HAERs which had to be made as a mitigating measure for deconstruction of the historically eligible buildings, the White Cement Mill and the Stock House.

APPENDIX B

Sacred Lands File Search

April 10, 2019

Native American Heritage Commission
1550 Harbor Boulevard, Suite 100
West Sacramento, CA 95691
FAX- 916-373-5471

Subject: Sacred Lands File Search Request for the Proposed La Brea Groundwater Project, City of Beverly Hills, California (D190167.00)

To whom it may concern:

Environmental Science Associates (ESA) is conducting a cultural resources assessment for the La Brea Groundwater Project (Project) located in the City of Beverly Hills (City). The City is proposing to construct approximately 11,900 linear feet (LF) of new 16-inch raw water transmission main pipeline, rehabilitate approximately 8,200 LF of an existing, abandoned, 18-inch pipeline, and construct up to three new groundwater extraction wells. The new pipeline would connect the extraction wells to the existing Foothill Water Treatment Plant.

The Project is located within an unsectioned portions of Township 1 South, Range 14 and 15 West on the Beverly Hills and Hollywood, CA U.S. Geological Survey (USGS) 7.5-minute topographic quadrangles (**Figures 1a and 1b**).

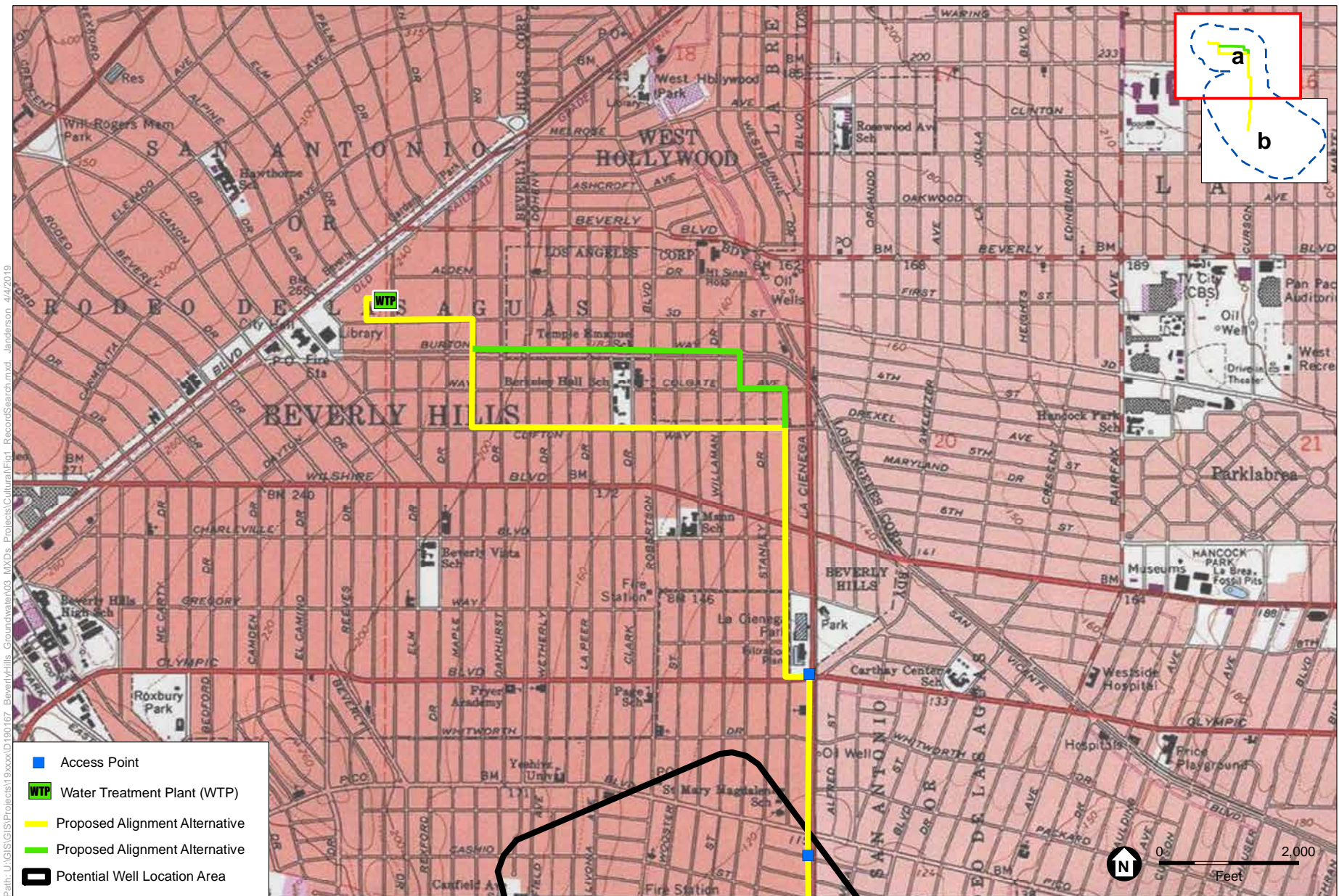
In an effort to provide an adequate appraisal of all potential impacts to cultural resources that may result from the proposed Project, ESA is requesting that a records search be conducted for sacred lands or traditional cultural properties that may exist within the Project.

Thank you for your time and assistance regarding this matter. To expedite the delivery of search results, please e-mail them to fclark@esassoc.com. Please contact me at 949.753.7001 or via e-mail me if you have any questions.

Sincerely,



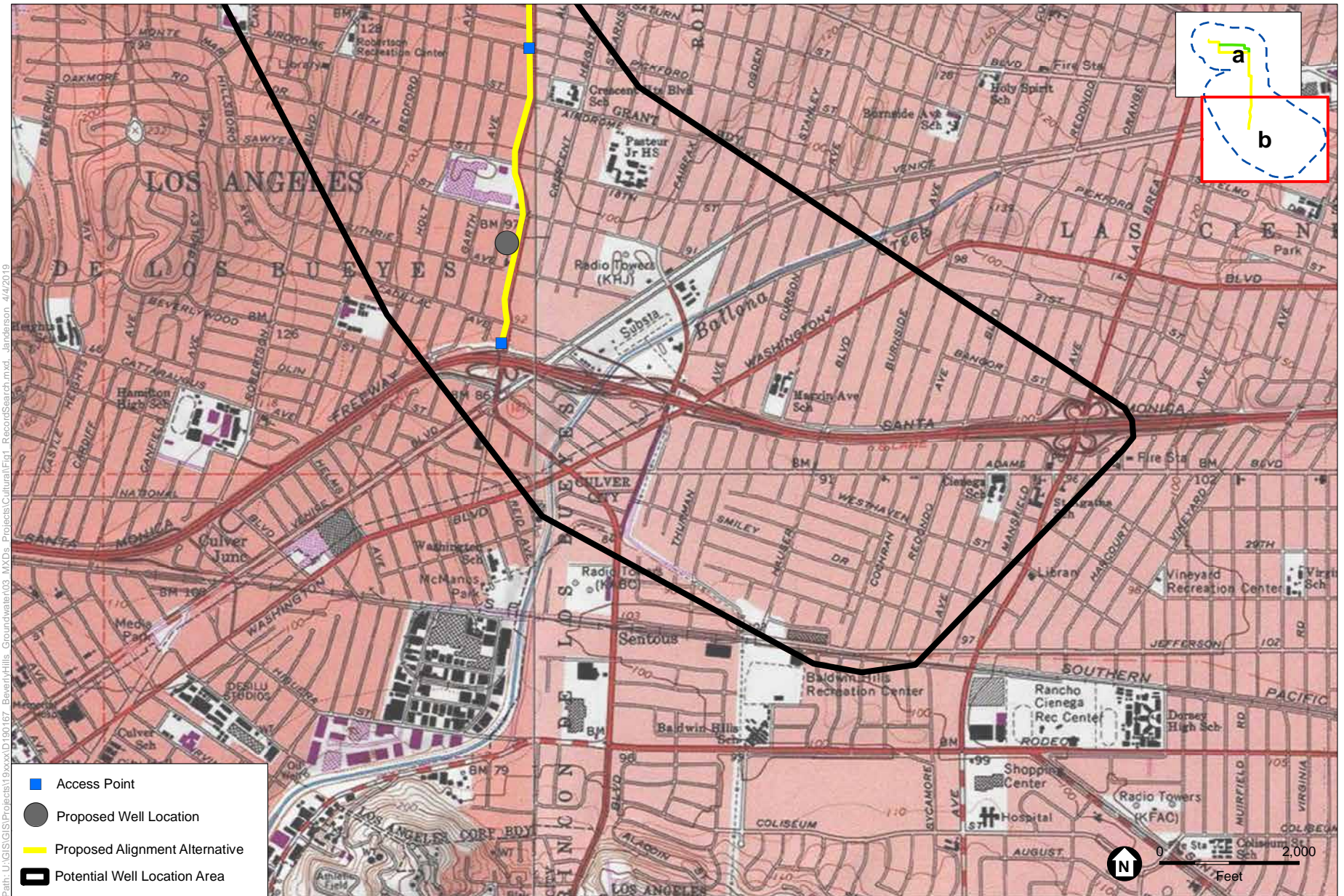
Fatima Clark
Archaeologist



SOURCE: ESRI; City of Beverly Hills; Beverly Hills and Hollywood Topoquads

Beverly Hills Groundwater Wells and Pipeline Project

Figure 1a
Record Search



SOURCE: ESRI; City of Beverly Hills; Beverly Hills and Hollywood Topoquads

Beverly Hills Groundwater Wells and Pipeline Project

Figure 1b
Record Search

STATE OF CALIFORNIA**Gavin Newsom, Governor**

NATIVE AMERICAN HERITAGE COMMISSION
Cultural and Environmental Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Phone: (916) 373-3710
Email: nahc@nahc.ca.gov
Website: <http://www.nahc.ca.gov>
Twitter: @CA_NAHC



April 25, 2019

Fatima Clark
ESA

VIA Email to: fclark@esassoc.com

RE: La Brea Groundwater Project, Los Angeles County.

Dear Ms. Clark:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information you have submitted for the above referenced project. The results were negative. However, the absence of specific site information in the SLF does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. I suggest you contact all of those indicated; if they cannot supply information, they might recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call or email to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from tribes, please notify me. With your assistance, we can assure that our lists contain current information. If you have any questions or need additional information, please contact me at my email address: katy.sanchez@nahc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Katy Sanchez".

KATY SANCHEZ
Associate Environmental Planner

Attachment

Native American Contacts List

4/24/2019

Gabrieleno Band of Mission Indians - Kizh Nation
 Andrew Salas, Chairperson
 P.O. Box 393
 Covina ,CA 91723
 admin@gabrielenoindians.org
 (626) 926-4131

Gabrielino

Gabrielino-Tongva Tribe
 Charles Alvarez, Councilmember
 23454 Vanowen St.
 West Hills ,CA 91307
 roadkingcharles@aol.com
 (310) 403-6048

Gabrielino

Gabrieleno/Tongva San Gabriel Band of Mission Indians
 Anthony Morales, Chairperson
 P.O. Box 693
 San Gabriel ,CA 91778
 GTTribalcouncil@aol.com
 (626) 483-3564 Cell
 (626) 286-1262 Fax

Gabrielino Tongva

Gabrielino /Tongva Nation
 Sandonne Goad, Chairperson
 106 1/2 Judge John Aiso St., #231
 Los Angeles ,CA 90012
 sgoad@gabrielino-tongva.com
 (951) 807-0479

Gabrielino Tongva

Gabrielino Tongva Indians of California Tribal Council
 Robert F. Dorame, Chairman
 P.O. Box 490
 Bellflower ,CA 90707
 gtongva@gmail.com
 (562) 761-6417 Voice/Fax

Gabrielino Tongva

Gabrielino-Tongva Tribe
 Linda Candelaria, Chairperson
 80839 Camino Santa Juliana
 Indio ,CA 92203
 lcandelaria1@gabrielinotribe.org

Gabrielino

This list is current as of the date of this document and is based on the information available to the Commission on the date it was produced.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code, or Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans Tribes for the proposed: La Brea Groundwater Project, Los Angeles County.

City of Beverly Hills La Brea Subarea Wells, Water Treatment, and Transmission Main Project, City of Beverly Hills and Los Angeles, California

Paleontological Resources Assessment Report

September 11, 2019

City of Beverly Hills



City of Beverly Hills La Brea Subarea Wells, Water Treatment, and Transmission Main Project, City of Beverly Hills and Los Angeles, California

Paleontological Resources Assessment Report

Prepared for:
City of Beverly Hills

September 11, 2019

Prepared by:
ESA
626 Wilshire Blvd. Suite 1100
Los Angeles, CA 90017

Project Directors:
Monica Strauss, M.A., RPA

Project Manager:
Sara Dietler, B.A.

Paleontological Principal Investigator and
Report Author:
Alyssa Bell, Ph.D.

Project Location:
Beverly Hills and Hollywood (CA) USGS 7.5-minute Topographic
Quads

626 Wilshire Boulevard
Suite 1100
Los Angeles, CA 90017
213.599.4300
www.esassoc.com



Irvine	Sacramento
Los Angeles	San Diego
Oakland	San Francisco
Orlando	Santa Monica
Pasadena	Seattle
Petaluma	Tampa
Portland	Camarillo

OUR COMMITMENT TO SUSTAINABILITY | ESA helps a variety of public and private sector clients plan and prepare for climate change and emerging regulations that limit GHG emissions. ESA is a registered assessor with the California Climate Action Registry, a Climate Leader, and founding reporter for the Climate Registry. ESA is also a corporate member of the U.S. Green Building Council and the Business Council on Climate Change (BC3). Internally, ESA has adopted a Sustainability Vision and Policy Statement and a plan to reduce waste and energy within our operations. This document was produced using recycled paper.

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City of Beverly Hills La Brea Subarea Wells, Water Treatment, and Transmission Main Project – Paleontological Resources Assessment Report

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Appendices

- A. Personnel

DEPARTMENT OF PUBLIC WORKS
345 Foothill Road
Beverly Hills, CA 90210

Engineering Division
(310) 285-2452
FAX: (310) 278-1838



June 21, 2019

Joseph Ontiveros
Cultural Resource Director
Soboba Band of Luiseno Indians
P.O. Box 487
San Jacinto, CA 92581

Subject: AB 52 Consultation (Public Resources Code Section 21080.3.1)
La Brea Subarea Wells and Transmission Main Project

Dear Mr. Ontiveros:

Pursuant to Assembly Bill 52 (Public Resources Code Section 21080.3.1) and in an effort to fully evaluate potential adverse effects to cultural resources, the City of Beverly Hills is contacting you to elicit information not contained in the present database and to provide an opportunity for California Native American tribes to discuss the proposed La Brea Subarea Wells and Transmission Main Project ("Project").

Project Description: The City of Beverly Hills (City) is proposing to implement the La Brea Subarea Wells and Transmission Main Project (proposed project), and is preparing an Initial Study/Mitigated Negative Declaration (IS/MND) to analyze the environmental effects of the Project. In order to expand the local water supply, the City proposes to develop the proposed 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 proposed project would include the construction of three groundwater production wells in the La Brea Subarea, the rehabilitation of an existing 18-inch pipeline, and the connection of the rehabilitated pipeline to a newly constructed raw water transmission main. The proposed transmission main would connect the proposed production wells to the existing Foothill Water Treatment Plant (WTP) for treatment and supply.

Project Location: The proposed project would be located within two jurisdictions; the City of Beverly Hills and the City of Los Angeles, as depicted on the attached 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 RO facilities that would treat the raw water received from the proposed groundwater production wells (Figure 2).

Soboba Band of Luiseno Indians

June 21, 2019

Page 2 of 2

The proposed Well Site No. 1 would be located at 1945 La Cienega Boulevard within the City of Los Angeles. Well Site No. 1 is owned by the City of Beverly Hills and is currently developed with a residential structure. Implementation of Well No. 1 would require the installation of 15-inch storm drain alignment, which would be located within the paved right-of-way (ROW). The precise locations of the two additional wells have not been determined at this time; however, they would be located within the City of Los Angeles in the La Brea Subarea boundary as illustrated on Figure 2, labeled as "Potential Well Location Area". The proposed transmission main would be approximately four miles long.

In accordance with Public Resources Code Section 21080.3.1, the City is offering you the opportunity to consult on this Project. You may respond regarding the proposed La Brea Subarea Wells and Transmission Main Project within thirty (30) days of receiving this letter. Alternatively, if you find that the nature of this Project does not require consultation, you are requested to sign the bottom of this letter, agreeing that no further consultation is necessary.

Your prompt response would be appreciated. Should you have any further questions regarding this matter, please feel free to contact me at (310) 285-2512 or via email at tmalabanan@beverlyhills.com. Thank you for your consideration of this request.

Sincerely,



Tristan D. Malabanan, P.E.
Project Manager

Enclosures

I, _____, agree that no further consultation is necessary due to the nature of the La Brea Subarea Wells and Transmission Main Project.

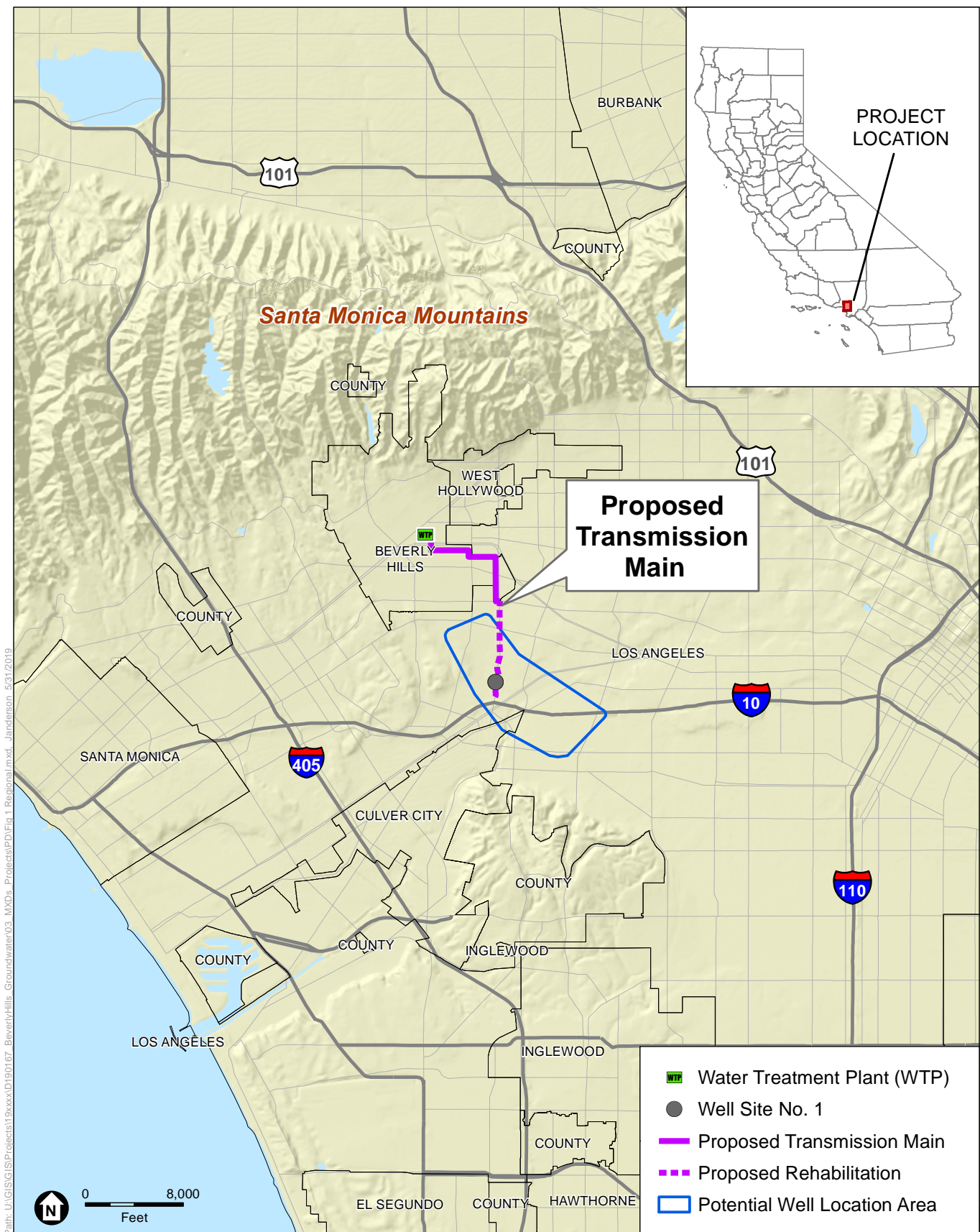
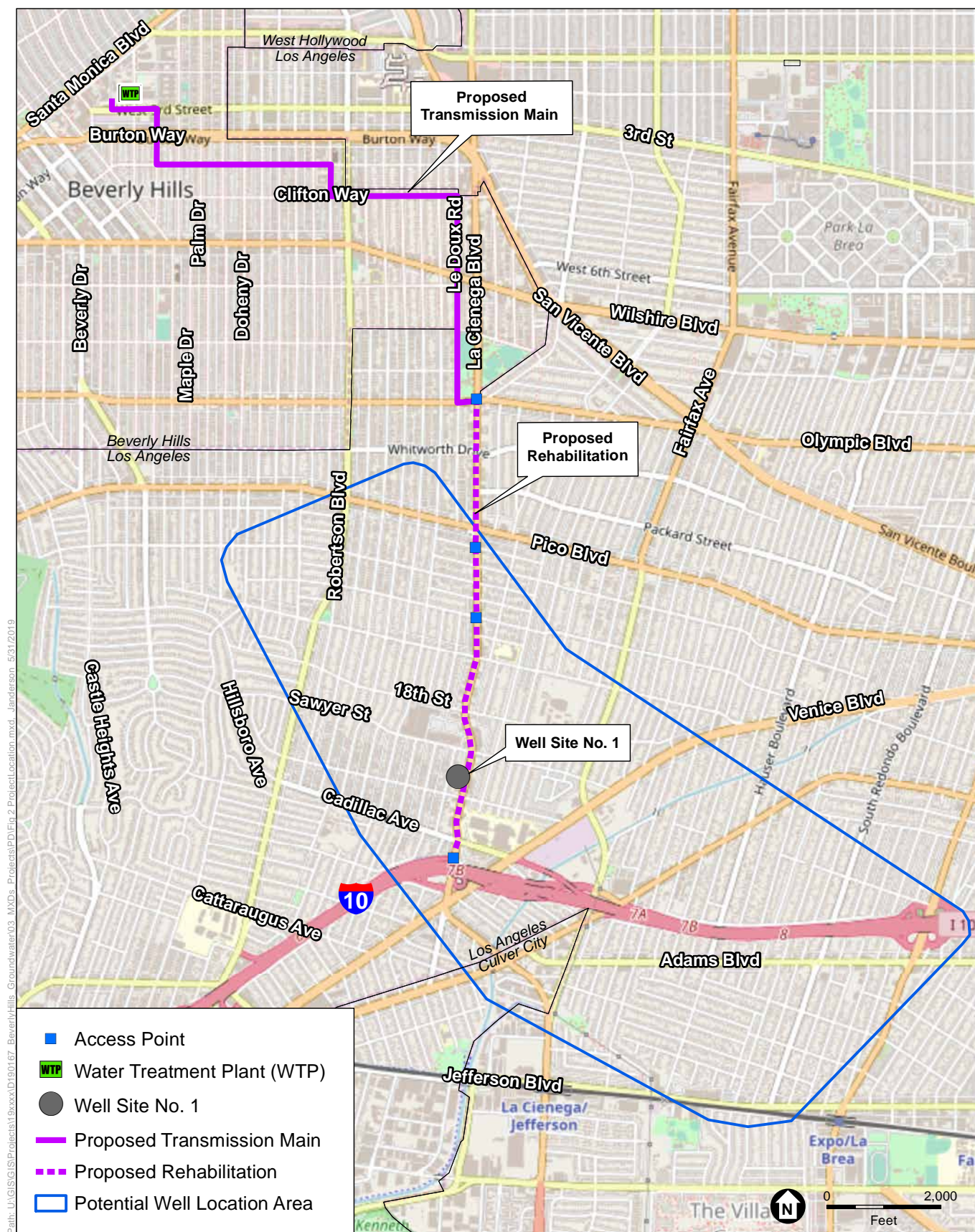


Figure 1
Regional Location



SOURCE: ESRI; City of Beverly Hills

La Brea Subarea Wells and Transmission Main Project

Figure 2
Project Location

DEPARTMENT OF PUBLIC WORKS
345 Foothill Road
Beverly Hills, CA 90210

Engineering Division
(310) 285-2452
FAX: (310) 278-1838



June 21, 2019

Michael Mirelez
Cultural Resource Coordinator
Torres Martinez Desert Cahuilla Indians
P.O. Box 1160
Thermal, CA 92274

Subject: AB 52 Consultation (Public Resources Code Section 21080.3.1)
La Brea Subarea Wells and Transmission Main Project

Dear Mr. Mirelez:

Pursuant to Assembly Bill 52 (Public Resources Code Section 21080.3.1) and in an effort to fully evaluate potential adverse effects to cultural resources, the City of Beverly Hills is contacting you to elicit information not contained in the present database and to provide an opportunity for California Native American tribes to discuss the proposed La Brea Subarea Wells and Transmission Main Project ("Project").

Project Description: The City of Beverly Hills (City) is proposing to implement the La Brea Subarea Wells and Transmission Main Project (proposed project), and is preparing an Initial Study/Mitigated Negative Declaration (IS/MND) to analyze the environmental effects of the Project. In order to expand the local water supply, the City proposes to develop the proposed 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 proposed project would include the construction of three groundwater production wells in the La Brea Subarea, the rehabilitation of an existing 18-inch pipeline, and the connection of the rehabilitated pipeline to a newly constructed raw water transmission main. The proposed transmission main would connect the proposed production wells to the existing Foothill Water Treatment Plant (WTP) for treatment and supply.

Project Location: The proposed project would be located within two jurisdictions; the City of Beverly Hills and the City of Los Angeles, as depicted on the attached 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 RO facilities that would treat the raw water received from the proposed groundwater production wells (Figure 2).

Torres Martinez Desert Cahuilla Indians

June 21, 2019

Page 2 of 2

The proposed Well Site No. 1 would be located at 1945 La Cienega Boulevard within the City of Los Angeles. Well Site No. 1 is owned by the City of Beverly Hills and is currently developed with a residential structure. Implementation of Well No. 1 would require the installation of 15-inch storm drain alignment, which would be located within the paved right-of-way (ROW). The precise locations of the two additional wells have not been determined at this time; however, they would be located within the City of Los Angeles in the La Brea Subarea boundary as illustrated on Figure 2, labeled as "Potential Well Location Area". The proposed transmission main would be approximately four miles long.

In accordance with Public Resources Code Section 21080.3.1, the City is offering you the opportunity to consult on this Project. You may respond regarding the proposed La Brea Subarea Wells and Transmission Main Project within thirty (30) days of receiving this letter. Alternatively, if you find that the nature of this Project does not require consultation, you are requested to sign the bottom of this letter, agreeing that no further consultation is necessary.

Your prompt response would be appreciated. Should you have any further questions regarding this matter, please feel free to contact me at (310) 285-2512 or via email at tmalabanan@beverlyhills.com. Thank you for your consideration of this request.

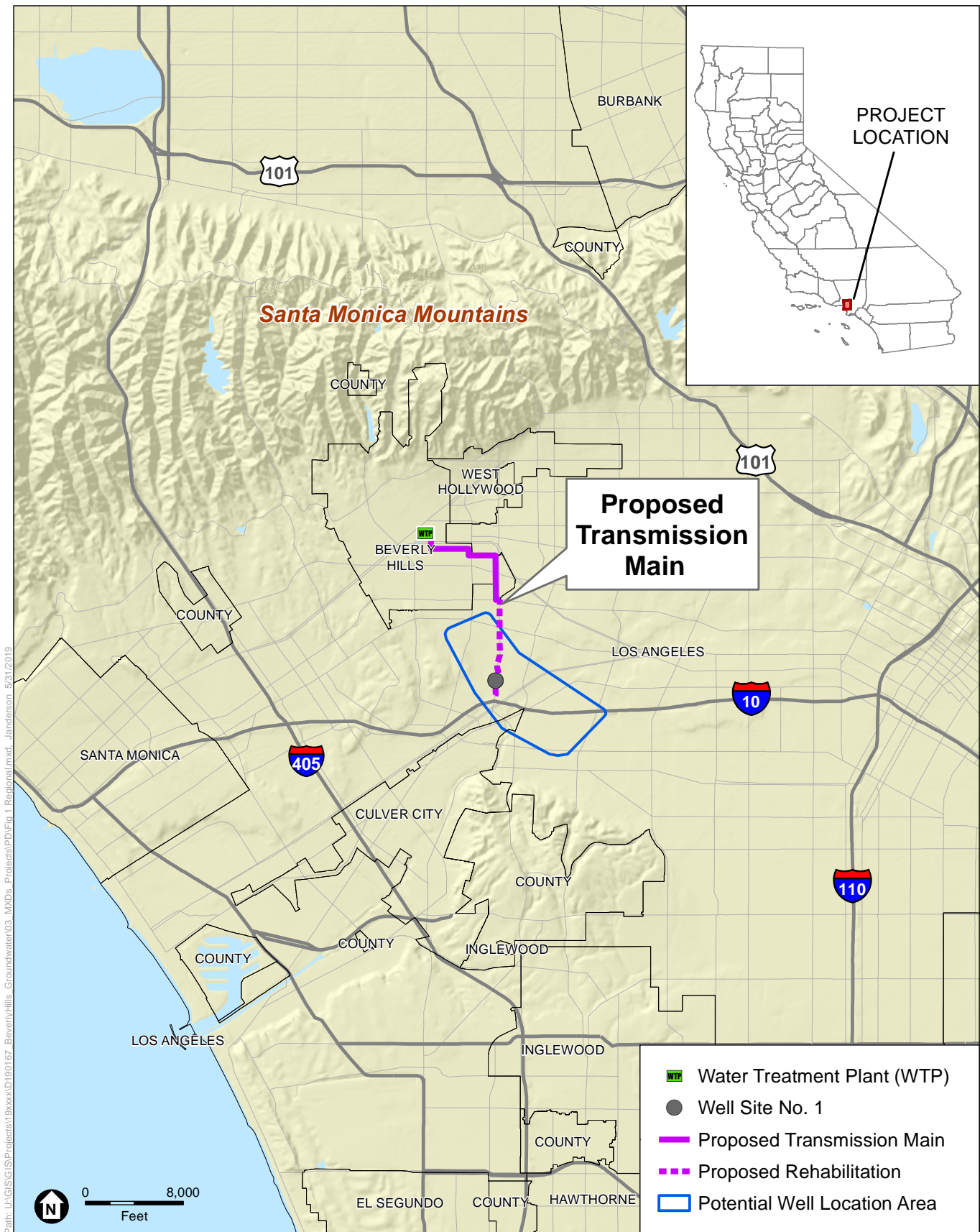
Sincerely,



Tristan D. Malabanan, P.E.
Project Manager

Enclosures

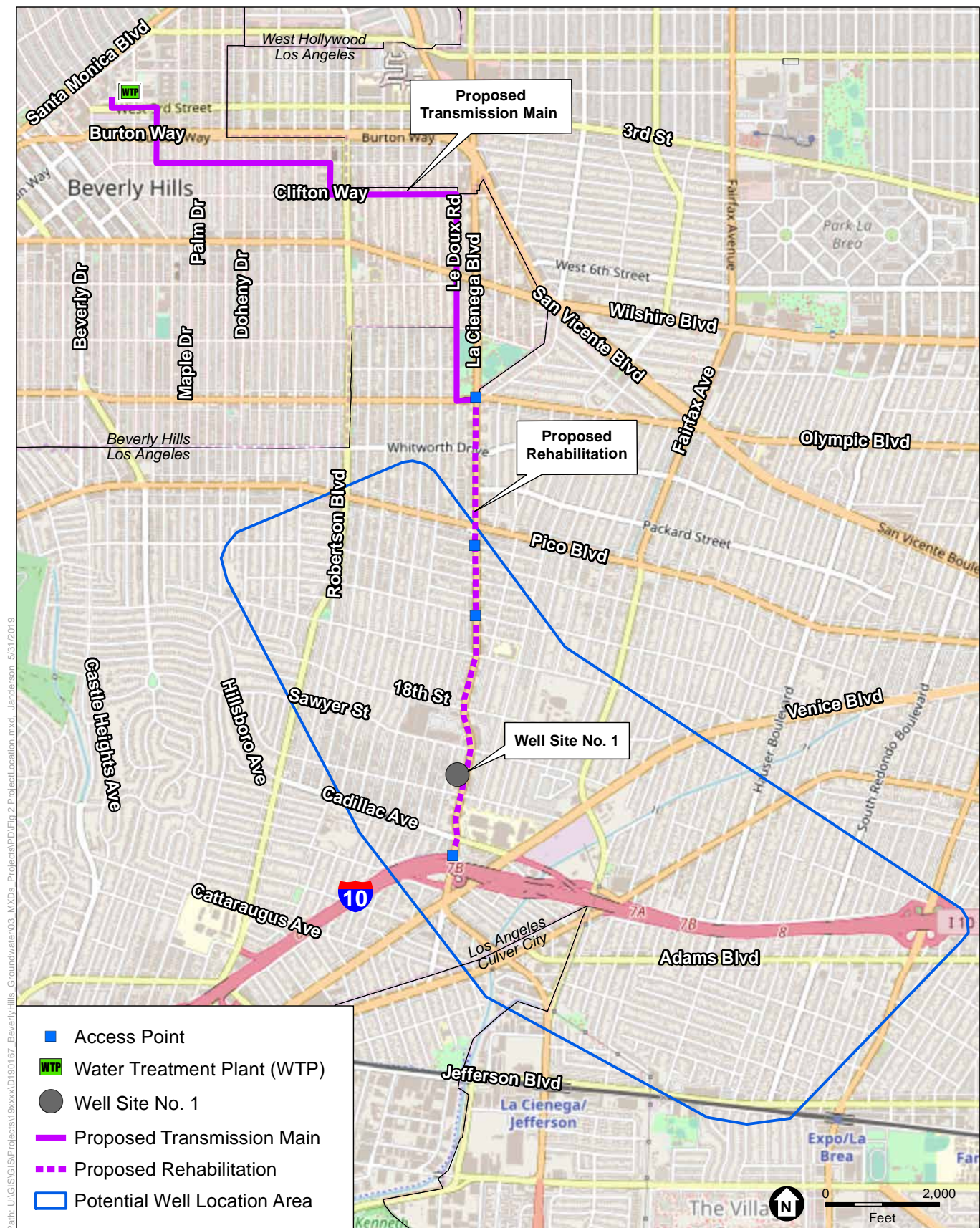
I, _____, agree that no further consultation is necessary due to the nature of the La Brea Subarea Wells and Transmission Main Project.



SOURCE: ESRI

La Brea Subarea Wells and Transmission Main Project

Figure 1
Regional Location



SOURCE: ESRI; City of Beverly Hills

La Brea Subarea Wells and Transmission Main Project

Figure 2
Project Location

DEPARTMENT OF PUBLIC WORKS
345 Foothill Road
Beverly Hills, CA 90210

Engineering Division
(310) 285-2452
FAX: (310) 278-1838



June 21, 2019

Andrew Salas
Chairman
Gabrieleño Band of Mission Indians — Kizh Nation
P0 Box 393
Covina, CA 91723

Subject: AB 52 Consultation (Public Resources Code Section 21080.3.1)
La Brea Subarea Wells and Transmission Main Project

Dear Mr. Salas:

Pursuant to Assembly Bill 52 (Public Resources Code Section 21080.3.1) and in an effort to fully evaluate potential adverse effects to cultural resources, the City of Beverly Hills is contacting you to elicit information not contained in the present database and to provide an opportunity for California Native American tribes to discuss the proposed La Brea Subarea Wells and Transmission Main Project ("Project").

Project Description: The City of Beverly Hills (City) is proposing to implement the La Brea Subarea Wells and Transmission Main Project (proposed project), and is preparing an Initial Study/Mitigated Negative Declaration (IS/MND) to analyze the environmental effects of the Project. In order to expand the local water supply, the City proposes to develop the proposed 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 proposed project would include the construction of three groundwater production wells in the La Brea Subarea, the rehabilitation of an existing 18-inch pipeline, and the connection of the rehabilitated pipeline to a newly constructed raw water transmission main. The proposed transmission main would connect the proposed production wells to the existing Foothill Water Treatment Plant (WTP) for treatment and supply.

Project Location: The proposed project would be located within two jurisdictions; the City of Beverly Hills and the City of Los Angeles, as depicted on the attached 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 RO facilities that would treat the raw water received from the proposed groundwater production wells (Figure 2).

Gabrieleño Band of Mission Indians — Kizh Nation

June 21, 2019

Page 2 of 2

The proposed Well Site No. 1 would be located at 1945 La Cienega Boulevard within the City of Los Angeles. Well Site No. 1 is owned by the City of Beverly Hills and is currently developed with a residential structure. Implementation of Well No. 1 would require the installation of 15-inch storm drain alignment, which would be located within the paved right-of-way (ROW). The precise locations of the two additional wells have not been determined at this time; however, they would be located within the City of Los Angeles in the La Brea Subarea boundary as illustrated on Figure 2, labeled as "Potential Well Location Area". The proposed transmission main would be approximately four miles long.

In accordance with Public Resources Code Section 21080.3.1, the City is offering you the opportunity to consult on this Project. You may respond regarding the proposed La Brea Subarea Wells and Transmission Main Project within thirty (30) days of receiving this letter. Alternatively, if you find that the nature of this Project does not require consultation, you are requested to sign the bottom of this letter, agreeing that no further consultation is necessary.

Your prompt response would be appreciated. Should you have any further questions regarding this matter, please feel free to contact me at (310) 285-2512 or via email at tmalabanan@beverlyhills.com. Thank you for your consideration of this request.

Sincerely,



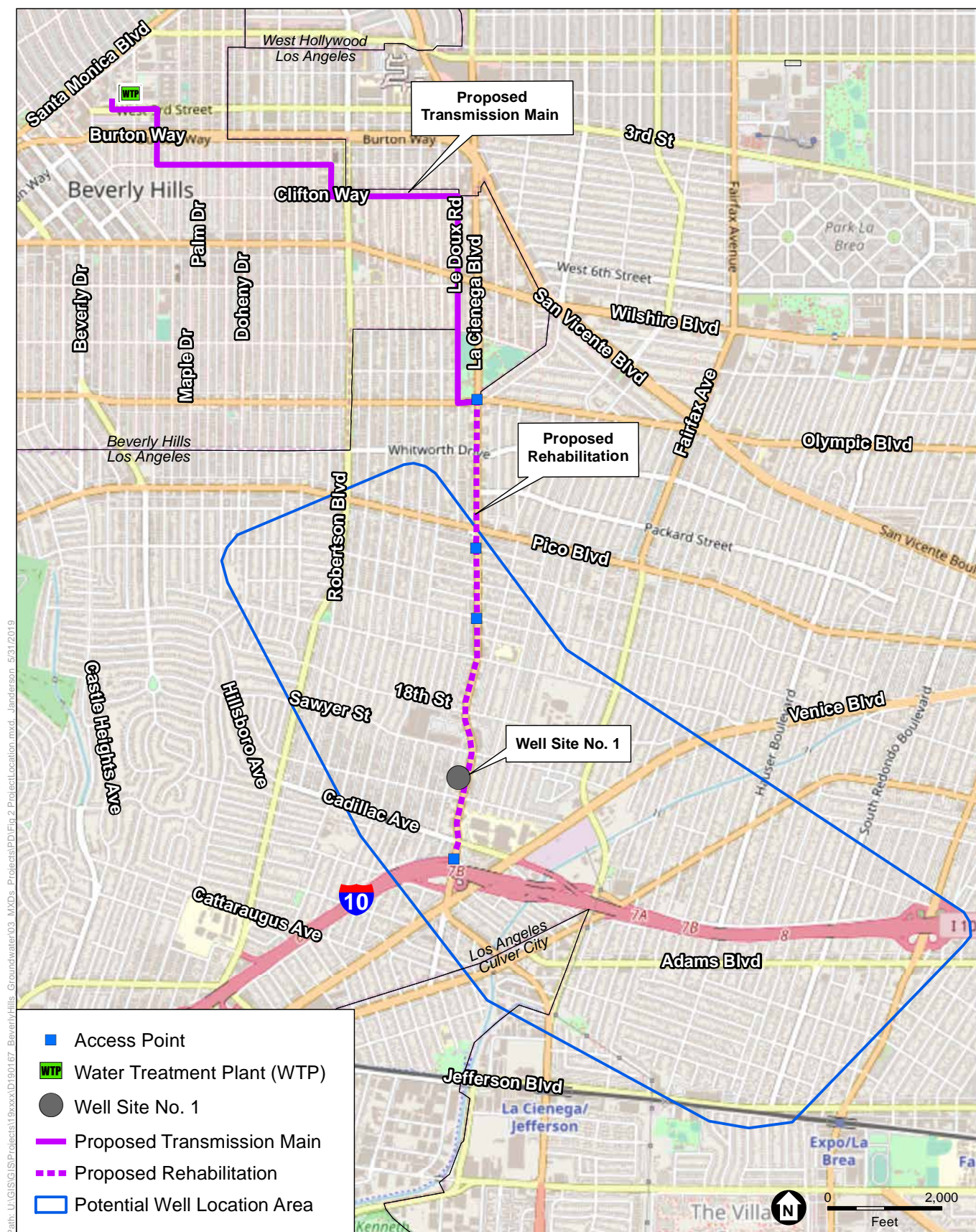
Tristan D. Malabanan, P.E.
Project Manager

Enclosures

I, _____, agree that no further consultation is necessary due to the nature of the La Brea Subarea Wells and Transmission Main Project.



Figure 1
Regional Location



SOURCE: ESRI; City of Beverly Hills

La Brea Subarea Wells and Transmission Main Project

Figure 2
Project Location



GABRIELENO BAND OF MISSION INDIANS - KIZH NATION

Historically known as The San Gabriel Band of Mission Indians
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

Project Name: La Brea Subarea wells and Transmission main project city of Beverly Hills

Dear Tristan D. Malabanan,

Thank you for your letter dated June 24, 2019 regarding AB52 consultation. The above proposed project location is within our Ancestral Tribal Territory; therefore, our Tribal Government requests to schedule a consultation with you as the lead agency, to discuss the project and the surrounding location in further detail .

Please contact us at your earliest convenience. ***Please Note :AB 52, “consultation” shall have the same meaning as provided in SB 18 (Govt. Code Section 65352.4).***

Thank you for your time,

Andrew Salas, Chairman
Gabrieleno Band of Mission Indians – Kizh Nation
1(844)390-0787

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CITY OF BEVERLY HILLS LA BREA SUBAREA WELLS, WATER TREATMENT, AND TRANSMISSION MAIN PROJECT

Paleontological Resources Assessment Report

Introduction

The City of Beverly Hills (City) proposes to develop the La Brea Subarea Wells, Water Treatment, and Transmission Main Project (proposed project). Environmental Science Associates (ESA) has conducted a paleontological resources assessment in support of an Initial Study/Mitigated Negative Declaration (IS/MND). 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.

ESA personnel involved in the preparation of this assessment are as follows: Monica Strauss, M.A., RPA, program director; Sara Dietler, B.A., Project Manager; Alyssa Bell, Ph.D., Paleontological Principal Investigator and assessment author; and Jessie Lee, GIS specialist. Resumes of key personnel are included in **Appendix A**.

Project Location

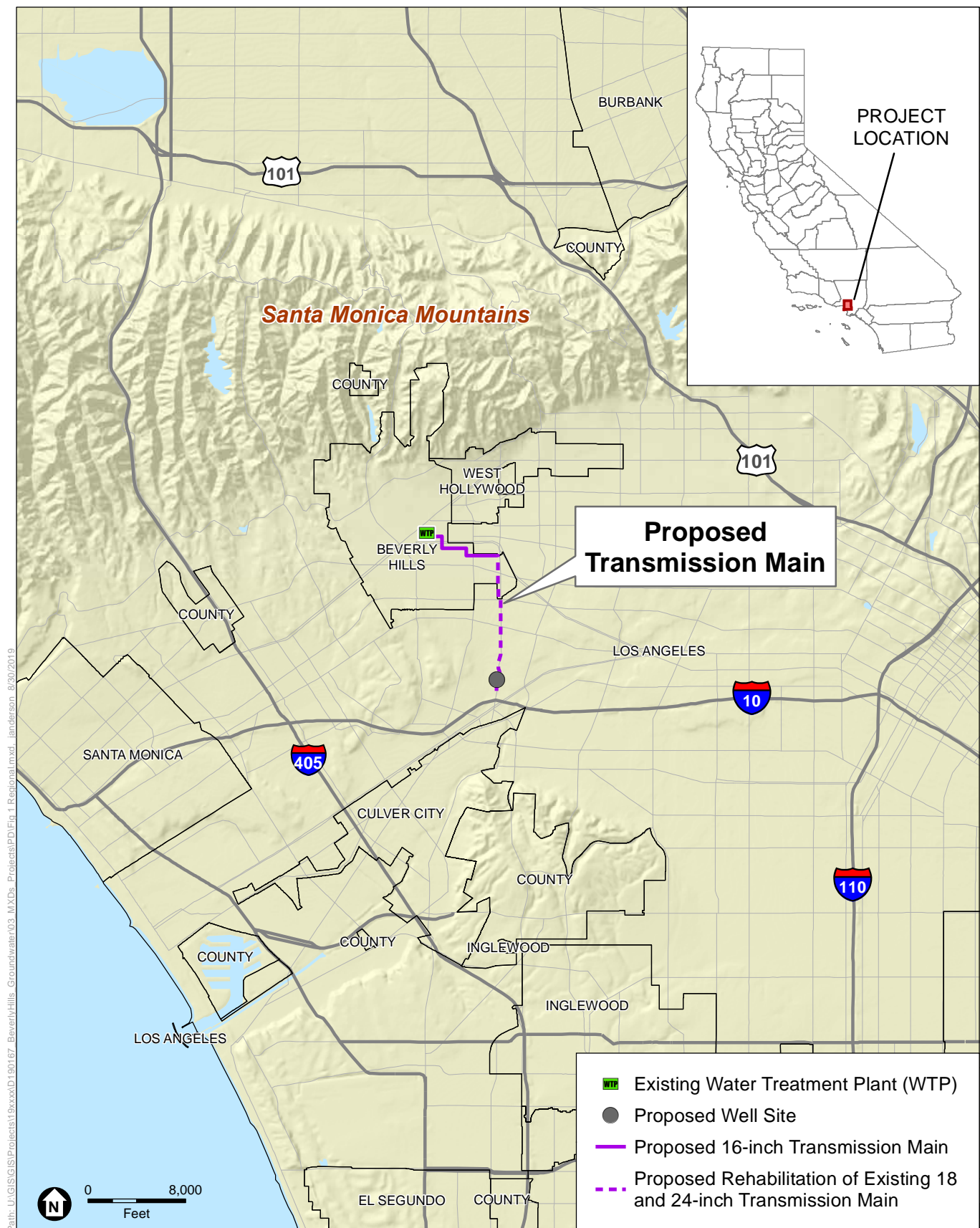
The proposed project would be located within two jurisdictions; the City of Beverly Hills and the City of Los Angeles, as depicted on **Figure 1, Regional Location** and **Figure 2, Project Location**. The City of Beverly Hills’ Foothill WTP is located on Foothill Road between Alden Drive and Third Street. 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.

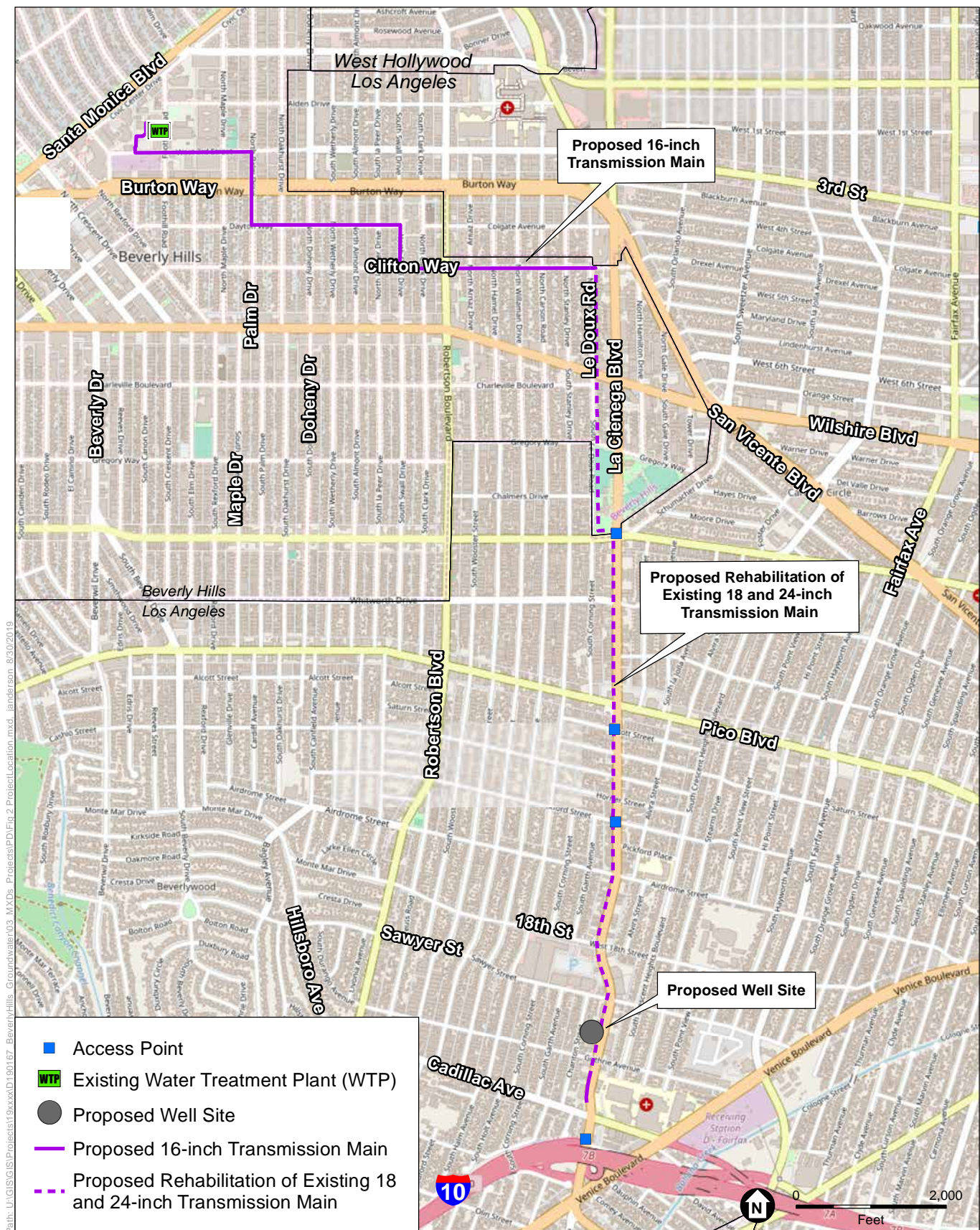
The proposed transmission main, in its entirety would be approximately four miles long. The proposed rehabilitation area of the transmission main (existing 18 and 24-inch inactive pipelines) would proceed north within La Cienega Boulevard to Olympic Boulevard and within Le Doux Road from Gregory Way 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).



SOURCE: ESRI

La Brea Subarea Well and Transmission Main Project

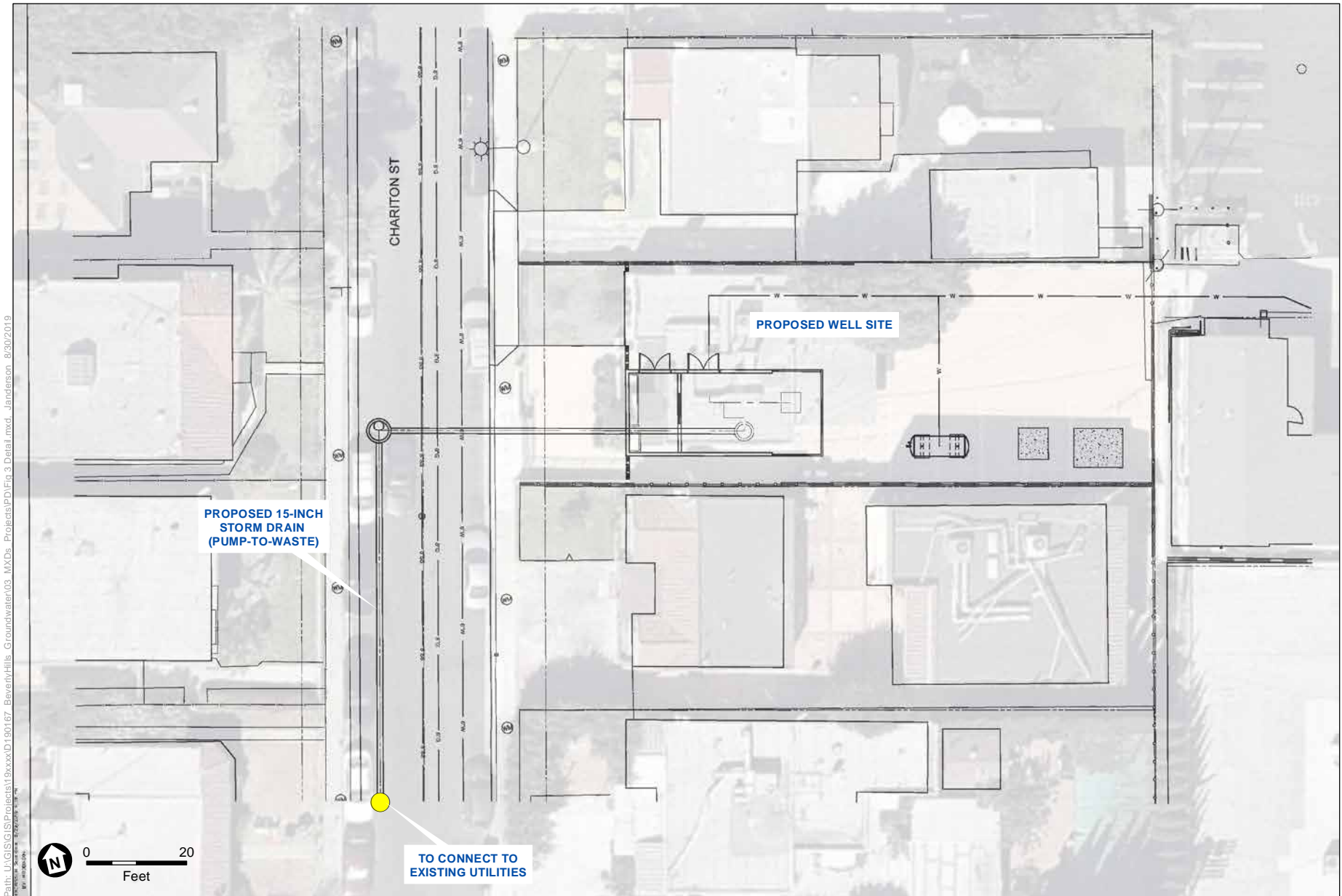
Figure 1
Regional Location



SOURCE: ESRI; City of Beverly Hills

La Brea Subarea Well and Transmission Main Project

Figure 2
Project Location



SOURCE: Mapbox; City of Beverly Hills

La Brea Subarea Well and Transmission Main Project

Figure 3
Proposed Well Site

Project Description

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.

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.

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 linear 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.

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.

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.

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.

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. Implementation of the new 16-inch transmission main would require the 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 technique¹. 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.

Regulatory Framework

State and Local Regulations

Paleontological resources are limited, nonrenewable resources of scientific, cultural, and educational value that are afforded protection under state laws and regulations. The following section summarizes the applicable federal and state laws and regulations, as well as professional standards provided by the Society of Vertebrate Paleontology (SVP, 2010).

State Regulations

California Environmental Quality Act

The State CEQA Guidelines (Title 14, Chapter 3 of the California Code of Regulations, Section 15000 *et seq.*), are prescribed by the Secretary of Resources to be followed by state and local agencies in California in their implementation of the CEQA. Appendix G of the State CEQA Guidelines includes an Environmental Checklist Form with questions that may be used by public agencies in their assessment of impacts on the environment. The question within Appendix G that relates to paleontological resources states: “Will the proposed project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?” The City of Los Angeles uses this question as its threshold of significance for determining whether impacts of

¹ 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.

paleontological resources are significant. CEQA protects paleontological resources by requiring an assessment of a project's potential paleontological impacts.

Public Resources Code Section 5097.5 and Section 30244

Other state requirements for paleontological resource management are included in PRC Section 5097.5 and Section 30244. These statutes prohibit the removal of any paleontological site or feature from public lands without permission of the jurisdictional agency, define the removal of paleontological sites or features as a misdemeanor, and require reasonable mitigation of adverse impacts to paleontological resources from developments on public (state, county, city, district) lands.

Local Regulations

City of Los Angeles – General Plan

The Conservation Element of the City of Los Angeles General Plan recognizes paleontological resources in Section 3: “Archeological and Paleontological” (II-3), specifically the La Brea Tar Pits, and identifies protection of paleontological resources as an objective (II-5). The General Plan identifies site protection as important, stating, “Pursuant to CEQA, if a land development project is within a potentially significant paleontological area, the developer is required to contact a bona fide paleontologist to arrange for assessment of the potential impact and mitigation of potential disruption of or damage to the site. If significant paleontological resources are uncovered during project execution, authorities are to be notified and the designated paleontologist may order excavations stopped, within reasonable time limits, to enable assessment, removal or protection of the resources” (City of Los Angeles, 2001²).

Methods and Results

Society for Vertebrate Paleontology

The SVP has established standard guidelines (SVP, 1995, 2010) that outline professional protocols and practices for conducting paleontological resource assessments and surveys, monitoring and mitigation, data and fossil recovery, sampling procedures, and specimen preparation, identification, analysis, and curation. Most practicing professional vertebrate paleontologists adhere closely to the SVP's assessment, mitigation, and monitoring requirements as specifically provided in its standard guidelines. Most state regulatory agencies with paleontological resource-specific Laws, Ordinances, Regulations, and Standards (LORS) accept and use the professional standards set forth by the SVP.

As defined by the SVP (2010:11), significant nonrenewable paleontological resources are:

Fossils and fossiliferous deposits, here defined as consisting of identifiable vertebrate fossils, large or small, uncommon invertebrate, plant, and trace fossils, and other data that provide taphonomic, taxonomic, phylogenetic, paleoecologic, stratigraphic, and/or biochronologic information. Paleontological resources are considered to be older than

² For documents referenced in this Report, please see References for full citations.

recorded human history and/or older than middle Holocene (i. e., older than about 5,000 radiocarbon years).

As defined by the SVP (1995:26), significant fossiliferous deposits are:

A rock unit or formation which contains significant nonrenewable paleontologic resources, here defined as comprising one or more identifiable vertebrate fossils, large or small, and any associated invertebrate and plant fossils, traces, and other data that provide taphonomic, taxonomic, phylogenetic, ecologic, and stratigraphic information (ichnites and trace fossils generated by vertebrate animals, e.g., trackways, or nests and middens which provide datable material and climatic information). Paleontologic resources are considered to be older than recorded history and/or older than 5,000 years BP [before present].

Based on the significance definitions of the SVP (1995), all identifiable vertebrate fossils are considered to have significant scientific value. This position is adhered to because vertebrate fossils are relatively uncommon, and only rarely will a fossil locality yield a statistically significant number of specimens of the same genus. Therefore, every vertebrate fossil found has the potential to provide significant new information on the taxon it represents, its paleoenvironment, and/or its distribution. Furthermore, all geologic units in which vertebrate fossils have previously been found are considered to have high sensitivity. Identifiable plant and invertebrate fossils are considered significant if found in association with vertebrate fossils or if defined as significant by project paleontologists, specialists, or local government agencies.

A geologic unit known to contain significant fossils is considered to be “sensitive” to adverse impacts if there is a high probability that earth-moving or ground-disturbing activities in that rock unit will either directly or indirectly disturb or destroy fossil remains. Paleontological sites indicate that the containing sedimentary rock unit or formation is fossiliferous. The limits of the entire rock formation, both areal and stratigraphic, therefore define the scope of the paleontological potential in each case (SVP, 1995).

Fossils are contained within surficial sediments or bedrock, and are therefore not observable or detectable unless exposed by erosion or human activity. Therefore, without natural erosion or human-caused exposure, paleontologists cannot know either the quality or quantity of fossils. As a result, even in the absence of surface fossils, it is necessary to assess the sensitivity of rock units based on their known potential to produce significant fossils elsewhere within the same geologic unit (both within and outside of the study area), a similar geologic unit, or based on whether the unit in question was deposited in a type of environment that is known to be favorable for fossil preservation. Monitoring by experienced paleontologists greatly increases the probability that fossils will be discovered during ground-disturbing activities and that, if the fossils are significant, that successful mitigation and salvage efforts may be undertaken.

Paleontological Potential

Paleontological potential is defined as the potential for a geologic unit to produce scientifically significant fossils. This is determined by rock type, past history of the geologic unit in producing significant fossils, and fossil localities recorded from that unit. Paleontological potential is

derived from the known fossil data collected from the entire geologic unit, not just from a specific survey. In its “Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources,” the SVP (2010) defines four categories of paleontological sensitivity (potential) for rock units: high, low, undetermined, and no potential:

- **High Potential.** Rock units from which vertebrate or significant invertebrate, plant, or trace fossils have been recovered are considered to have a high potential for containing additional significant paleontological resources. Rock units classified as having high potential for producing paleontological resources include, but are not limited to, sedimentary formations and some volcanoclastic formations (e. g., ashes or tephra), and some low-grade metamorphic rocks which contain significant paleontological resources anywhere within their geographical extent, and sedimentary rock units temporally or lithologically suitable for the preservation of fossils (e. g., middle Holocene and older, fine-grained fluvial sandstones, argillaceous and carbonate-rich paleosols, cross-bedded point bar sandstones, fine-grained marine sandstones, etc.).
- **Low Potential.** Reports in the paleontological literature or field surveys by a qualified professional paleontologist may allow determination that some rock units have low potential for yielding significant fossils. Such rock units will be poorly represented by fossil specimens in institutional collections, or based on general scientific consensus only preserve fossils in rare circumstances and the presence of fossils is the exception not the rule, e. g. basalt flows or Recent colluvium. Rock units with low potential typically will not require impact mitigation measures to protect fossils.
- **Undetermined Potential.** Rock units for which little information is available concerning their paleontological content, geologic age, and depositional environment are considered to have undetermined potential. Further study is necessary to determine if these rock units have high or low potential to contain significant paleontological resources. A field survey by a qualified professional paleontologist to specifically determine the paleontological resource potential of these rock units is required before a paleontological resource impact mitigation program can be developed. In cases where no subsurface data are available, paleontological potential can sometimes be determined by strategically located excavations into subsurface stratigraphy.
- **No Potential.** Some rock units have no potential to contain significant paleontological resources, for instance high-grade metamorphic rocks (such as gneisses and schists) and plutonic igneous rocks (such as granites and diorites). Rock units with no potential require no protection nor impact mitigation measures relative to paleontological resources. [SVP, 2010; 1-2]

For geologic units with high potential, full-time monitoring is generally recommended during any project-related ground disturbance. For geologic units with low potential, protection or salvage efforts will not generally be required. For geologic units with undetermined potential, field surveys by a qualified vertebrate paleontologist should be conducted to specifically determine the paleontologic potential of the rock units present within the study area.

Paleontological Resources Significance Criteria

Numerous paleontological studies have developed criteria for the assessment of significance for fossil discoveries (e.g. Eisentraut and Cooper, 2002; Murphey and Daitch, 2007; Scott and

Springer, 2003, etc.). In general, these studies assess fossils as significant if one or more of the following criteria apply:

1. The fossils provide information on the evolutionary relationships and developmental trends among organisms, living or extinct;
2. The fossils provide data useful in determining the age(s) of the rock unit or sedimentary stratum, including data important in determining the depositional history of the region and the timing of geologic events therein;
3. The fossils provide data regarding the development of biological communities or interaction between paleobotanical and paleozoological biotas;
4. The fossils demonstrate unusual or spectacular circumstances in the history of life; or
5. The fossils are in short supply and/or in danger of being depleted or destroyed by the elements, vandalism, or commercial exploitation, and are not found in other geographic locations.

In summary, significant paleontological resources are determined to be fossils or assemblages of fossils that are unique, unusual, rare, uncommon, or diagnostically important (Eisentraut and Cooper, 2002; Murphey and Daitch, 2007; Scott and Springer, 2003). Significant fossils can include remains of large to very small aquatic and terrestrial vertebrates or remains of plants and animals previously not represented in certain portions of the stratigraphy. Assemblages of fossils that might aid stratigraphic correlation, particularly those offering data for the interpretation of tectonic events, geomorphologic evolution, and paleoclimatology are also critically important (Scott and Springer, 2003; Scott et al., 2004).

Archival Research

The Project Site was the subject of thorough background research and analysis. The research included a paleontological records search conducted by the Natural History Museum of Los Angeles County (LACM), as well as geologic map and literature reviews conducted by ESA paleontologist Alyssa Bell, Ph.D.

Geologic Setting

The Project Site is located in the Los Angeles Basin, a structural depression approximately 50 miles long and 20 miles wide in the northernmost Peninsular Ranges Geomorphic Province (Ingersoll and Rumelhart, 1999). The Los Angeles basin developed as a result of tectonic forces and the San Andreas fault zone, with subsidence occurring 18 – 3 million years ago (Ma) (Critelli et al., 1995). While sediments dating back to the Cretaceous (66 Ma) are preserved in the basin, continuous sedimentation began in the middle Miocene (around 13 Ma) (Yerkes et al., 1965). Since that time, sediments have been eroded into the basin from the surrounding highlands, resulting in thousands of feet of accumulation (Yerkes et al., 1965). Most of these sediments are marine, as they eroded from surrounding marine formations, until sea level dropped in the Pleistocene Epoch and deposition of the alluvial sediments that compose the uppermost units in the Los Angeles Basin began.

The Los Angeles Basin is subdivided into four structural blocks, with the Project Site located in the northwestern-most part of the Central Block, where sediments range from 32,000 to 35,000 feet thick (Yerkes et al., 1965). The Central Block is wedge-shaped, extending from the Santa Monica Mountains in the northwest, where it is about 10 miles wide, to the San Joaquin Hills to the southeast, where it widens to around 20 miles across (Yerkes et al., 1965).

Geologic Map & Literature Review

Geologic mapping by Dibblee and Ehrenspeck (1991) indicates that the surface of the Project Site is covered with Holocene-aged younger alluvium (mapped as Qa in **Figure 3**), likely overlying older alluvium and marine sediments, which in turn may overlie the Monterey Formation at undetermined depths. These geologic units are discussed below.

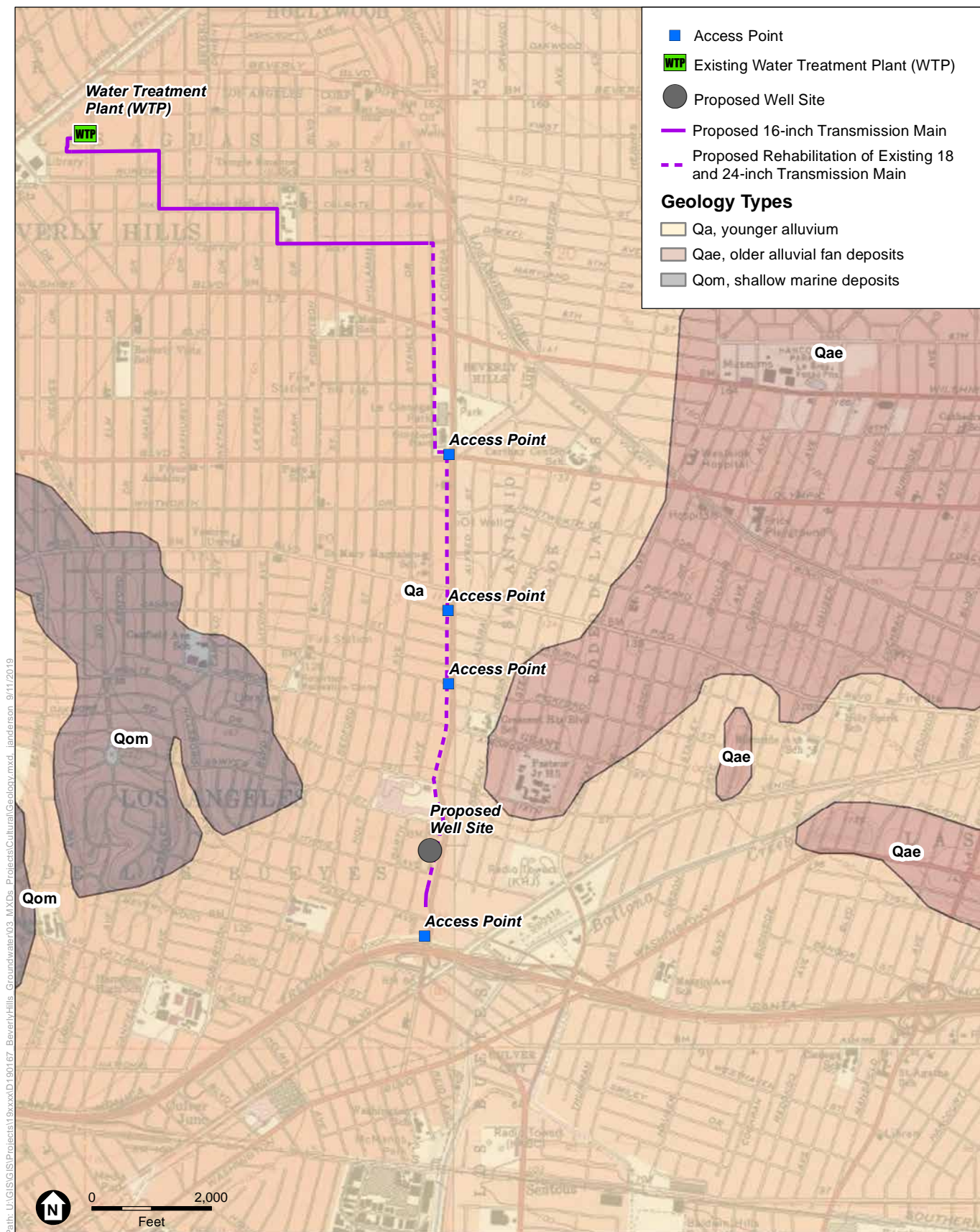
Younger Alluvium (Qa). These sediments consist of unconsolidated silt, sand, and gravel and date from modern times to the Holocene (Dibblee and Ehrenspeck, 1991). Younger alluvium is mapped as occurring across the entirety of the Project Site at the surface. Due to the young age of these deposits, they 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 LA 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 Site, as close as 0.1 – 0.2 miles from the Project Site, indicating these sediments may be present in the subsurface of the Project Site 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, 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 Site, as close as 0.4 miles. indicating they may be present in the shallow subsurface of the Project Site. 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 LA Basin. In the Cheviot Hills, roughly 1.5 miles west of the southern portion of the Project Site, over one hundred species of marine invertebrates, primarily mollusks, were identified from Pleistocene marine sediments (Rodda,

1957). Across the LA 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 Site due to truncation by the Hollywood-Santa Monica Fault Zone to the north of the Project Site, 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).



SOURCE: USGS 7.5' Topo Quad Beverly Hills 1978, 1981; Hollywood 1978, 1982; Dibblee Geological Foundation

Beverly Hills Groundwater Wells and Pipeline Project

Figure 3
Geology

LACM Records Search

On April 19, 2019, ESA requested a database search from the LACM for records of fossil localities in and around the Project Site. 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 Site 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 Site. 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 LA Basin, as reported in the literature review above.

Paleontological Sensitivity Analysis

The review of the scientific literature and geologic mapping, as well as the records search from LACM, were used to assign paleontological potentials to the geologic units present at the surface and subsurface of the Project Site that would be subject to ground-disturbing activities, following the guidelines of the SVP (1995, 2010):

- **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 Site (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 Site (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 Site (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.

Conclusions and Recommendations

As a result of this study, sediments present across the Project Site 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:

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.
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.
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.

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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Appendix A

Personnel



Alyssa Bell, PhD

Paleontologist

EDUCATION

Ph.D., Vertebrate
Paleontology;
University of Southern
California

M.S., Environmental
Microbiology; University
of Tennessee

B.A. with honors,
Ecology and
Systematics; William
Jewell College &
Homerton College,
Cambridge University

10 YEARS EXPERIENCE

Dr. Alyssa Bell has supervised and performed field work, authored project reports, and provided scientific and compliance direction and quality control for paleontological projects throughout Southern California. Dr. Bell has accumulated a wealth of field experience, working with crews from a variety of institutions on field sites in California, Arizona, New Mexico, South Dakota, and Utah, and has led her own expeditions in Montana. She has performed all manner of investigations from surveys and assessments to monitoring and fossil identification over the last 15 years as a part of her academic pursuits and professional consultation, with the last three years being exclusively professional endeavors.

In addition to consulting, Dr. Bell serves as a postdoctoral fellow at the Dinosaur Institute of the Natural History Museum of Los Angeles County (LACM). There she is involved in pursuing her own research into fossil birds as well as working with the Institute's field projects and museum-wide education and outreach initiatives. She has also published peer-reviewed articles and book chapters and given numerous presentations at scientific conferences on both her paleontological and microbiological research.

Relevant Experience

ICHA Area 10 (PA 10-2 & 10-4) Archaeological and Paleontological Monitoring, Irvine, CA. *Principal Investigator & Project Paleontologist.* Dr. Bell managed the curatorial process for fossils collected during monitoring of pre-construction activities at the University of California, Irvine, and authored the final report.

Suncrest Reactive Power Support Project, San Diego County, CA. *Principal Investigator.* Dr. Bell authored the paleontological assessment for the Proponent's Environmental Assessment (PEA) in support for a dynamic reactive power support facility and associated 230-kilovolt (kV) transmission line near Alpine, California. The application for Certificate of Public Convenience and Necessity was filed in summer 2015 and the PEA was deemed complete in December 2015.

Washington National Archaeological and Paleontological Monitoring (Access Culver City), Culver City, CA. *Principal Investigator & Project Paleontologist.* Dr. Bell managed the curatorial process for fossils collected during monitoring of pre-construction activities at the Washington national site in Culver City, CA and authored the final report.

OTO Hotels Santa Monica Archaeological and Paleontological Service, Santa Monica, CA. *Principal Investigator.* Dr. Bell supervised paleontological monitoring and mitigation services during construction excavations and grading. Services included implementation of a paleontological mitigation monitoring program and reporting.

Sacred Heart Specific Plan Environmental Impact Report (EIR), La Canada Flintridge, CA. *Principal Investigator.* Dr. Bell prepared paleontological studies and

developed monitoring & mitigation recommendations for the Sacred Heart development project.

Sixth & Bixel Paleontological Monitoring Services Project, Los Angeles, CA.

Principal Investigator & Project Paleontologist. Dr. Bell supervised paleontological monitoring of preconstruction activities in support of a development project encompassing two parcels in downtown Los Angeles. During these activities, monitors identified and recovered numerous significant vertebrate fossils. Dr. Bell supervised the excavation of fossilized whale remains discovered on-site, and oversaw the collection and curation of all fossil specimens.

Natural and Cultural Support for the Gordon Mull Subdivision EIR, Glendora, CA.

Principal Investigator. Dr. Bell collected the necessary data to prepare the technical sections and mitigation recommendations to support an EIR prepared by another firm to address the Gordon Mull Subdivision in the city of Glendora. The project is proposes to redevelop a 71-acre, 19-lot located in the San Gabriel Foothills.

Lake Elsinore Lakeshore Town Center Permitting, Riverside County, CA.

Principal Investigator. Dr. Bell provided paleontological studies and developed monitoring and mitigation recommendations for the Lake Elsinore Town Center project in Riverside County.

San Pedro Plaza Park - Phase III Archaeological Monitor, Los Angeles, CA.

Principal Investigator. Dr. Bell identified fossils during the mitigation measurement-required archaeological monitoring of earthmoving activities in San Pedro Park Plaza. She is also responsible for curation of the fossil material and authorship of the paleontological section of the final report.

City of Hope Specific Plan and EIR, Duarte, CA. *Principal Investigator.* Dr. Bell provided paleontological resource studies for the City of Hope Specific Plan Project.

Blythe Solar Power Project, Units 1 & 2, Riverside County, CA.

Project Paleontologist. Dr. Bell supervised paleontological monitoring of preconstruction activities for a solar photo-voltaic cell power-generating facility outside the city of Blythe. As a part of her role, she provided oversight and management of paleontological monitors and development of the final monitoring report.

Industrial Project Environmental Impact Report, Colton, CA.

Principal Investigator. Dr. Bell provided a paleontological resources study for a six-acre industrial project site at the southwest corner of Agua Mansa Road and Rancho Avenue in the city of Colton.

Mojave Solar Project Paleontological Reporting, San Bernardino County, CA.

Principal Investigator. Dr. Bell managed curation of fossil materials and authored the final report of paleontological monitoring services provided for construction activities in support of a solar field development project in San Bernardino County.

El Camino Real Bridge Replacement Environmental Services, Atascadero, CA.

Principal Investigator. Dr. Bell provided environmental services, including preparation of all California Environmental Quality Act (CEQA)/National Environmental Policy Act (NEPA) documentation, technical studies, and permitting, for the replacement of the El Camino Real Bridge over Santa Margarita Creek in Atascadero.



Recycled Water Transmission Water Main Paleo Monitoring, Fresno, CA.

Principal Investigator. Dr. Bell developed a monitoring and mitigation plan for the city of Fresno recycled water main construction project.

Shafter Wasco Irrigation District Natural and Cultural Resource Evaluations and Air Quality, Kern County CA.

Principal Investigator. Dr. Bell provided paleontological studies and developed recommendations for the monitoring and mitigation of paleontological resources for the project.

Valentine EIR, Kern County, CA. *Principal Investigator.* Dr. Bell provided paleontological resources support for a 2,000-acre solar PV project in the Mojave Desert. Deliverables included comprehensive technical reports, GIS impact analysis, strategic and permitting support, and a paleontological field survey in the preparation of an EIR and other permitting requirements.

Valentine Solar EIR 115MW Supplemental Reports, Kern County, CA. *Principal Investigator.* Dr. Bell provided paleontological studies in support of changes to the previously established Valentine Solar project.

Valentine Solar Biological and Paleontological Study Updates, Rosamond, Kern County, CA. *Principal Investigator & Project Paleontologist.* Dr. Bell provided paleontological studies, carried out a paleontological survey, and developed monitoring and mitigation guidelines for the Valentine Solar project.

Field Research

2006-Present. The Dinosaur Institute, LACM. Coordinator and Team Leader on expeditions in Montana (Niobrara and Pierre Shale Formations) and Arizona (Chinle Formation). Field assistant on expeditions to Montana (Hell Creek Formation), Utah (Morrison Formation), Arizona (Chinle Formation), New Mexico (Kirtland Formation), and California (Aztec Sandstone). During this period approximately four-six weeks are spent in the field in various locations every year.

2015. Principal Investigator, Field Manager. SWCA Environmental Consultants. Supervision of all paleontological field work, including excavation of a partial whale fossil from a downtown Los Angeles construction site and numerous monitoring projects.

2014. University of Southern California. Field Assistant on an expedition to South Africa (Pre-Cambrian).

2005. Cambridge University. Field Assistant on an expedition in Badlands National Park, South Dakota (White River Group).

2002-2004. Montana State University Northern. Field Assistant on excavations in Montana (Judith River Formation).

Publications

Bell, A. and L. Chiappe, 2015. Identification of a new Hesperornithiform from the Cretaceous Niobrara Chalk and implications for ecologic diversity among early diving birds. PLOS One 10: e0141690.

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Conference Presentations

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Bell, A. and L.M. Chiappe, 2010. Identifying trends in avian ecomorphology. International Ornithological Congress. Sao Paulo, Brazil.

Bell, A., L.M. Chiappe, and J. O'Connor, 2009. Ecological diversity of Mesozoic birds: morphometric analysis with a phylogenetic perspective. Society of Vertebrate Paleontology. Bristol, United Kingdom.

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Appendix D

Noise and Vibration Information

Project: Beverly Hills Pipeline**Construction Noise Impact on Sensitive Receptors****Parameters**

Construction Hours:	8 Daytime hours (7 am to 7 pm)
	0 Evening hours (7 pm to 10 pm)
	0 Nighttime hours (10 pm to 7 am)
Leq to L10 factor	3

				R1 (Well Site)				Pipeline Work			
Construction Phase Equipment Type	No. of Equip.	Reference Noise Level at 50ft, Lmax	Acoustical Usage Factor	Distance (ft)	Lmax	Leq	L10	Distance (ft)	Lmax	Leq	L10
Well Site Demolition and Pump-to-Waste					93	88			93	88	
Jaw Crusher	2	84	10%	25	93	83	86	25	93	83	86
Dozer	1	82	40%	25	88	84	87	25	88	84	87
Excavator	1	81	40%	50	81	77	80	40	83	79	82
Forklift	1	75	10%	50	75	65	68	40	77	67	70
Tractor/Loader/Backhoe	1	80	25%	75	76	70	73	55	79	73	76
Other Equipment	1	85	50%	75	81	78	81	55	84	81	84
Well Construction Monitoring					88	88			89	89	
Air Compressor	1	78	40%	25	84	80	83	25	84	80	83
Bore/Drill Rig Truck	2	79	20%	25	88	81	84	25	88	81	84
Cranes	1	81	40%	50	81	77	80	40	83	79	82
Generator Sets	1	81	50%	50	81	78	81	40	83	80	83
Dump/Haul Trucks	1	76	40%	75	72	68	71	65	74	70	73
Other Equipment	4	85	50%	75	87	84	87	65	89	86	89
Pumps	1	81	50%	100	75	72	75	90	76	73	76
Tractor/Loader/Backhoe	1	80	25%	100	74	68	71	90	75	69	72
Well Equipping					87	83			87	83	
Cranes	1	81	40%	25	87	83	86	25	87	83	86
Forklift	1	75	10%	50	75	65	68	50	75	65	68
Rehabilitation/Transmission Main Installation					88	87			88	87	
Dozer	1	82	40%	25	88	84	87	25	88	84	87
Excavator	1	81	40%	25	87	83	86	25	87	83	86
Tractor/Loader/Backhoe	2	80	25%	75	79	73	76	75	79	73	76
Other Equipment	1	85	50%	150	75	72	75	150	75	72	75
Maximum Noise Level (Overlapping Phases)						91			87		

(1) Well Site Demo/Pump-to-Waste + Rehab/Transmission Main Installation

(2) Rehab/Transmission Main Installation + Well Construction Monitoring

(3) Rehab/Transmission Main Installation + Well Equipping

Source for Ref. Noise Levels: LA CEQA Guides, 2006 & FHWA RCNM, 2005

Noise Measurement Data

Project: **BH Pipeline**Location: **R1****06/30/19 07/01/19 07/02/19 07/03/19****Start Date and Time**

12:00:00 AM		44.1		6/30/2019	7:00:00 AM	Start
1:00:00 AM		44.6		7/1/2019	8:00:00 AM	6/30/19 8:00 AM
2:00:00 AM		43.4		7/2/2019	9:00:00 AM	End
3:00:00 AM		48.5		7/3/2019	10:00:00 AM	7/1/19 8:00 AM
4:00:00 AM		50.5			11:00:00 AM	
5:00:00 AM		50.8			12:00:00 PM	
6:00:00 AM		52.3			1:00:00 PM	
7:00:00 AM		55.4				
8:00:00 AM	55.0					
9:00:00 AM	63.4					
10:00:00 AM	55.4					
11:00:00 AM	55.4					
12:00:00 PM	53.1					
1:00:00 PM	54.7					
2:00:00 PM	55.4					
3:00:00 PM	54.9					
4:00:00 PM	53.6					
5:00:00 PM	53.9					
6:00:00 PM	53.2					
7:00:00 PM	52.5					
8:00:00 PM	52.1					
9:00:00 PM	50.8					
10:00:00 PM	47.9					
11:00:00 PM	53.0					

CNEL	58.0
L _{dn}	57.7
24-hr Max.	63.4
24-hr Min.	43.4
24-hr Nighttime Average ^a	49.6
24-hr Nighttime Max	53.0
24-hr Nighttime Min	43.4
24-hr Daytime Average ^a	55.9
24-hr Daytime Max	63.4
24-hr Daytime Min	50.8
Total Period Average	54.4
Total Period Max	63.4
Total Period Min	43.4
Total Period Daytime Average	55.9
Total Period Daytime Max	63.4
Total Period Daytime Min	53.1
Total Period Nighttime Average	49.6
Total Period Nighttime Max	53.0
Total Period Nighttime Min	43.4

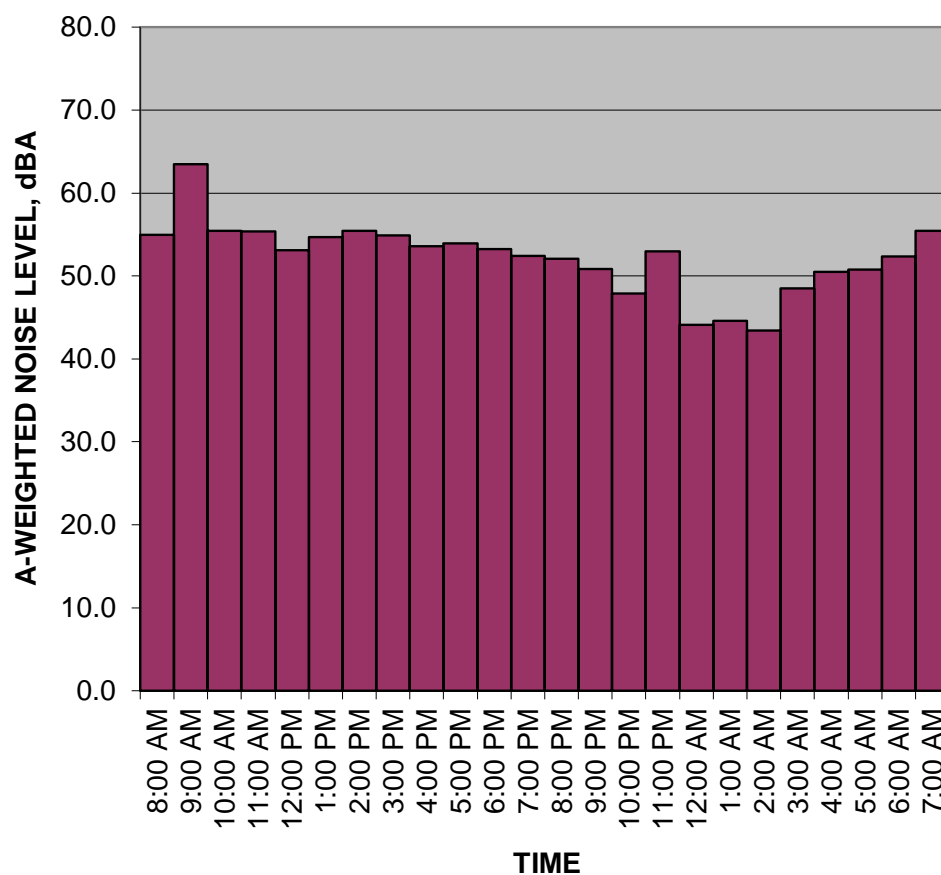
^a Daytime hours are from 7:00 a.m. to 10:00 p.m., and nighttime hours are from 10:00 p.m. to 7:00 a.m.

Measured Ambient Noise Levels

Project: BH Pipeline
 Location: R1
 Sources: Ambient

Date: June 30 - July 1, 2019

TIME	HNL, dB(A)
8:00 AM	55.0
9:00 AM	63.4
10:00 AM	55.4
11:00 AM	55.4
12:00 PM	53.1
1:00 PM	54.7
2:00 PM	55.4
3:00 PM	54.9
4:00 PM	53.6
5:00 PM	53.9
6:00 PM	53.2
7:00 PM	52.5
8:00 PM	52.1
9:00 PM	50.8
10:00 PM	47.9
11:00 PM	53.0
12:00 AM	44.1
1:00 AM	44.6
2:00 AM	43.4
3:00 AM	48.5
4:00 AM	50.5
5:00 AM	50.8
6:00 AM	52.3
7:00 AM	55.4
CNEL, dB(A):	58.0



NOTES:

Summary

File Name on Meter	R2
File Name on PC	SLM_0005055_LxT_Data_031.01.ldbin
Serial Number	0005055
Model	SoundTrack LxT®
Firmware Version	2.302
User	
Location	
Job Description	
Note	

Measurement

Description

Start	2019-07-01 10:12:36
Stop	2019-07-01 10:27:36
Duration	00:15:00.0
Run Time	00:15:00.0
Pause	00:00:00.0

Pre Calibration	2019-07-01 09:33:36
Post Calibration	None
Calibration Deviation	---

Overall Settings

RMS Weight	A Weighting		
Peak Weight	A Weighting		
Detector	Slow		
Preamp	PRMLxT1		
Microphone Correction	Off		
Integration Method	Exponential		
Overload	144.5 dB		
	A	C	Z
Under Range Peak	100.8	97.8	102.8 dB
Under Range Limit	49.8	47.8	55.8 dB
Noise Floor	36.6	37.3	44.9 dB

Results

LASeq	78.3 dB	
LASE	107.9 dB	
EAS	6.833 mPa²h	
EAS8	218.655 mPa²h	
EAS40	1.093 Pa²h	
LASpeak (max)	2019-07-01 10:17:00	111.2 dB
LASmax	2019-07-01 10:17:00	99.4 dB
LASmin	2019-07-01 10:17:31	57.8 dB
SEA	-99.9 dB	

Summary

File Name on Meter	R2 Nighttime
File Name on PC	SLM_0005055_LxT_Data_039.00.ldbin
Serial Number	0005055
Model	SoundTrack LxT®
Firmware Version	2.302
User	
Location	
Job Description	
Note	

Measurement

Description	
Start	2019-07-02 00:27:55
Stop	2019-07-02 00:42:55
Duration	00:15:00.0
Run Time	00:15:00.0
Pause	00:00:00.0
Pre Calibration	2019-07-01 09:33:36
Post Calibration	None
Calibration Deviation	---

Overall Settings

RMS Weight	A Weighting		
Peak Weight	Z Weighting		
Detector	Slow		
Preamp	PRMLxT1		
Microphone Correction	Off		
Integration Method	Exponential		
Overload	144.5 dB		
	A	C	Z
Under Range Peak	100.8	97.8	102.8 dB
Under Range Limit	49.8	47.8	55.8 dB
Noise Floor	36.6	37.3	44.9 dB

Results

LASeq	73.8 dB	
LASE	103.3 dB	
EAS	2.388 mPa²h	
EAS8	76.429 mPa²h	
EAS40	382.144 mPa²h	
LZSpeak (max)	2019-07-02 00:39:10	107.9 dB
LASmax	2019-07-02 00:39:10	85.7 dB
LASmin	2019-07-02 00:27:57	51.8 dB
SEA	-99.9 dB	
LAS > 85.0 dB (Exceedance Counts / Duration)	1	1.8 s
LAS > 115.0 dB (Exceedance Counts / Duration)	0	0.0 s
LZSpeak > 135.0 dB (Exceedance Counts / Duration)	0	0.0 s
LZSpeak > 137.0 dB (Exceedance Counts / Duration)	0	0.0 s
LZSpeak > 140.0 dB (Exceedance Counts / Duration)	0	0.0 s

Summary

File Name on Meter	R3
File Name on PC	SLM_0005055_LxT_Data_032.01.ldbin
Serial Number	0005055
Model	SoundTrack LxT®
Firmware Version	2.302
User	
Location	
Job Description	
Note	

Measurement

Description	
Start	2019-07-01 10:32:56
Stop	2019-07-01 10:47:56
Duration	00:15:00.0
Run Time	00:15:00.0
Pause	00:00:00.0
Pre Calibration	2019-07-01 09:33:36
Post Calibration	None
Calibration Deviation	---

Overall Settings

RMS Weight	A Weighting		
Peak Weight	A Weighting		
Detector	Slow		
Preamp	PRMLxT1		
Microphone Correction	Off		
Integration Method	Exponential		
Overload	144.5 dB		
	A	C	Z
Under Range Peak	100.8	97.8	102.8 dB
Under Range Limit	49.8	47.8	55.8 dB
Noise Floor	36.6	37.3	44.9 dB

Results

LASeq	74.4 dB	
LASE	103.9 dB	
EAS	2.733 mPa²h	
EAS8	87.461 mPa²h	
EAS40	437.306 mPa²h	
LA_{peak} (max)	2019-07-01 10:39:07	100.6 dB
LA_{max}	2019-07-01 10:42:27	82.3 dB
LA_{min}	2019-07-01 10:47:14	54.1 dB
SEA	-99.9 dB	

Summary

File Name on Meter	R3 Nighttime
File Name on PC	SLM_0005055_LxT_Data_038.00.ldbin
Serial Number	0005055
Model	SoundTrack LxT®
Firmware Version	2.302
User	
Location	
Job Description	
Note	

Measurement

Description	
Start	2019-07-02 00:10:09
Stop	2019-07-02 00:25:09
Duration	00:15:00.0
Run Time	00:15:00.0
Pause	00:00:00.0
Pre Calibration	2019-07-01 09:33:36
Post Calibration	None
Calibration Deviation	---

Overall Settings

RMS Weight	A Weighting		
Peak Weight	Z Weighting		
Detector	Slow		
Preamp	PRMLxT1		
Microphone Correction	Off		
Integration Method	Exponential		
Overload	144.5 dB		
	A	C	Z
Under Range Peak	100.8	97.8	102.8 dB
Under Range Limit	49.8	47.8	55.8 dB
Noise Floor	36.6	37.3	44.9 dB

Results

LASeq	74.7 dB	
LASE	104.2 dB	
EAS	2.920 mPa²h	
EAS8	93.444 mPa²h	
EAS40	467.221 mPa²h	
LZSpeak (max)	2019-07-02 00:17:57	104.0 dB
LASmax	2019-07-02 00:11:13	82.3 dB
LASmin	2019-07-02 00:22:55	53.0 dB
SEA	-99.9 dB	
LAS > 85.0 dB (Exceedance Counts / Duration)	0	0.0 s
LAS > 115.0 dB (Exceedance Counts / Duration)	0	0.0 s
LZSpeak > 135.0 dB (Exceedance Counts / Duration)	0	0.0 s
LZSpeak > 137.0 dB (Exceedance Counts / Duration)	0	0.0 s
LZSpeak > 140.0 dB (Exceedance Counts / Duration)	0	0.0 s

Summary

File Name on Meter	R4
File Name on PC	SLM_0005055_LxT_Data_033.01.ldbin
Serial Number	0005055
Model	SoundTrack LxT®
Firmware Version	2.302
User	
Location	
Job Description	
Note	

Measurement

Description	
Start	2019-07-01 10:55:41
Stop	2019-07-01 11:10:41
Duration	00:15:00.0
Run Time	00:15:00.0
Pause	00:00:00.0
Pre Calibration	2019-07-01 09:33:36
Post Calibration	None
Calibration Deviation	---

Overall Settings

RMS Weight	A Weighting		
Peak Weight	A Weighting		
Detector	Slow		
Preamp	PRMLxT1		
Microphone Correction	Off		
Integration Method	Exponential		
Overload	144.5 dB		
	A	C	Z
Under Range Peak	100.8	97.8	102.8 dB
Under Range Limit	49.8	47.8	55.8 dB
Noise Floor	36.6	37.3	44.9 dB

Results

LASeq	75.0 dB	
LASE	104.6 dB	
EAS	3.169 mPa²h	
EAS8	101.417 mPa²h	
EAS40	507.083 mPa²h	
LA_{peak} (max)	2019-07-01 10:58:10	109.7 dB
LA_{max}	2019-07-01 10:58:10	93.0 dB
LA_{min}	2019-07-01 11:02:10	59.0 dB
SEA	-99.9 dB	

Summary

File Name on Meter	R4 Nighttime
File Name on PC	SLM_0005055_LxT_Data_037.01.ldbin
Serial Number	0005055
Model	SoundTrack LxT®
Firmware Version	2.302
User	
Location	
Job Description	
Note	

Measurement

Description	
Start	2019-07-01 23:48:45
Stop	2019-07-02 00:03:45
Duration	00:15:00.0
Run Time	00:15:00.0
Pause	00:00:00.0
Pre Calibration	2019-07-01 09:33:36
Post Calibration	None
Calibration Deviation	---

Overall Settings

RMS Weight	A Weighting		
Peak Weight	Z Weighting		
Detector	Slow		
Preamp	PRMLxT1		
Microphone Correction	Off		
Integration Method	Exponential		
Overload	144.5 dB		
	A	C	Z
Under Range Peak	100.8	97.8	102.8 dB
Under Range Limit	49.8	47.8	55.8 dB
Noise Floor	36.6	37.3	44.9 dB

Results

LASeq	74.0 dB	
LASE	103.6 dB	
EAS	2.526 mPa²h	
EAS8	80.819 mPa²h	
EAS40	404.097 mPa²h	
LZSpeak (max)	2019-07-01 23:53:58	110.4 dB
LASmax	2019-07-01 23:51:44	84.9 dB
LASmin	2019-07-01 23:53:23	49.6 dB
SEA	-99.9 dB	
LAS > 85.0 dB (Exceedance Counts / Duration)	0	0.0 s
LAS > 115.0 dB (Exceedance Counts / Duration)	0	0.0 s
LZSpeak > 135.0 dB (Exceedance Counts / Duration)	0	0.0 s
LZSpeak > 137.0 dB (Exceedance Counts / Duration)	0	0.0 s
LZSpeak > 140.0 dB (Exceedance Counts / Duration)	0	0.0 s

Summary

File Name on Meter	R5
File Name on PC	SLM_0005055_LxT_Data_034.01.ldbin
Serial Number	0005055
Model	SoundTrack LxT®
Firmware Version	2.302
User	
Location	
Job Description	
Note	

Measurement

Description	
Start	2019-07-01 11:21:46
Stop	2019-07-01 11:36:46
Duration	00:15:00.0
Run Time	00:15:00.0
Pause	00:00:00.0
Pre Calibration	2019-07-01 09:33:36
Post Calibration	None
Calibration Deviation	---

Overall Settings

RMS Weight	A Weighting		
Peak Weight	A Weighting		
Detector	Slow		
Preamp	PRMLxT1		
Microphone Correction	Off		
Integration Method	Exponential		
Overload	144.5 dB		
	A	C	Z
Under Range Peak	100.8	97.8	102.8 dB
Under Range Limit	49.8	47.8	55.8 dB
Noise Floor	36.6	37.3	44.9 dB

Results

LASeq	70.7 dB	
LASE	100.2 dB	
EAS	1.174 mPa²h	
EAS8	37.574 mPa²h	
EAS40	187.868 mPa²h	
LA_{peak} (max)	2019-07-01 11:33:22	98.7 dB
LA_{max}	2019-07-01 11:33:44	84.7 dB
LA_{min}	2019-07-01 11:36:22	57.6 dB
SEA	-99.9 dB	

Summary

File Name on Meter	R5 Nighttime
File Name on PC	SLM_0005055_LxT_Data_036.01.ldbin
Serial Number	0005055
Model	SoundTrack LxT®
Firmware Version	2.302
User	
Location	
Job Description	
Note	

Measurement

Description

Start	2019-07-01 23:26:21
Stop	2019-07-01 23:41:21
Duration	00:15:00.0
Run Time	00:15:00.0
Pause	00:00:00.0

Pre Calibration	2019-07-01 09:33:36
Post Calibration	None
Calibration Deviation	---

Overall Settings

RMS Weight	A Weighting		
Peak Weight	Z Weighting		
Detector	Slow		
Preamp	PRMLxT1		
Microphone Correction	Off		
Integration Method	Exponential		
Overload	144.5 dB		
	A	C	Z
Under Range Peak	100.8	97.8	102.8 dB
Under Range Limit	49.8	47.8	55.8 dB
Noise Floor	36.6	37.3	44.9 dB

Results

LASeq	74.7 dB	
LASE	104.3 dB	
EAS	2.979 mPa²h	
EAS8	95.327 mPa²h	
EAS40	476.634 mPa²h	
LZSpeak (max)	2019-07-01 23:38:10	112.8 dB
LASmax	2019-07-01 23:38:10	90.8 dB
LASmin	2019-07-01 23:26:48	49.6 dB
SEA	-99.9 dB	

LAS > 85.0 dB (Exceedance Counts / Duration)	2	5.8 s
LAS > 115.0 dB (Exceedance Counts / Duration)	0	0.0 s
LZSpeak > 135.0 dB (Exceedance Counts / Duration)	0	0.0 s
LZSpeak > 137.0 dB (Exceedance Counts / Duration)	0	0.0 s
LZSpeak > 140.0 dB (Exceedance Counts / Duration)	0	0.0 s

Summary

File Name on Meter	R6
File Name on PC	SLM_0004285_LxT_Data_119.00.ldbin
Serial Number	0004285
Model	SoundTrack LxT®
Firmware Version	2.302
User	
Location	
Job Description	
Note	

Measurement

Description	
Start	2019-07-01 11:33:07
Stop	2019-07-01 11:48:07
Duration	00:15:00.0
Run Time	00:15:00.0
Pause	00:00:00.0
Pre Calibration	2019-07-01 10:19:11
Post Calibration	None
Calibration Deviation	---

Overall Settings

RMS Weight	A Weighting		
Peak Weight	A Weighting		
Detector	Slow		
Preamp	PRMLxT2B		
Microphone Correction	Off		
Integration Method	Exponential		
Overload	144.7 dB		
	A	C	Z
Under Range Peak	101.0	98.0	103.0 dB
Under Range Limit	50.0	48.0	56.0 dB
Noise Floor	36.8	37.5	45.1 dB

Results

LASeq	63.3 dB	
LASE	92.9 dB	
EAS	216.028 $\mu\text{Pa}^2\text{h}$	
EAS8	6.913 mPa^2h	
EAS40	34.565 mPa^2h	
LASpeak (max)	2019-07-01 11:37:48	101.0 dB
LASmax	2019-07-01 11:46:11	81.9 dB
LASmin	2019-07-01 11:35:33	45.0 dB
SEA	-99.9 dB	

Summary

File Name on Meter	R7
File Name on PC	SLM_0004285_LxT_Data_118.00.ldbin
Serial Number	0004285
Model	SoundTrack LxT®
Firmware Version	2.302
User	
Location	
Job Description	
Note	

Measurement

Description	
Start	2019-07-01 11:06:23
Stop	2019-07-01 11:21:23
Duration	00:15:00.0
Run Time	00:15:00.0
Pause	00:00:00.0
Pre Calibration	2019-07-01 10:19:11
Post Calibration	None
Calibration Deviation	---

Overall Settings

RMS Weight	A Weighting		
Peak Weight	A Weighting		
Detector	Slow		
Preamp	PRMLxT2B		
Microphone Correction	Off		
Integration Method	Exponential		
Overload	144.7 dB		
	A	C	Z
Under Range Peak	101.0	98.0	103.0 dB
Under Range Limit	50.0	48.0	56.0 dB
Noise Floor	36.8	37.5	45.1 dB

Results

LASeq	61.8 dB	
LASE	91.3 dB	
EAS	150.936 $\mu\text{Pa}^2\text{h}$	
EAS8	4.830 mPa^2h	
EAS40	24.150 mPa^2h	
LASpeak (max)	2019-07-01 11:07:52	93.6 dB
LASmax	2019-07-01 11:07:52	79.7 dB
LASmin	2019-07-01 11:16:29	47.8 dB
SEA	-99.9 dB	
LAS > 85.0 dB (Exceedance Counts / Duration)	0	0.0 s
LAS > 115.0 dB (Exceedance Counts / Duration)	0	0.0 s
LASpeak > 135.0 dB (Exceedance Counts / Duration)	0	0.0 s
LASpeak > 137.0 dB (Exceedance Counts / Duration)	0	0.0 s
LASpeak > 140.0 dB (Exceedance Counts / Duration)	0	0.0 s

Summary

File Name on Meter	R8
File Name on PC	SLM_0004285_LxT_Data_117.00.ldbin
Serial Number	0004285
Model	SoundTrack LxT®
Firmware Version	2.302
User	
Location	
Job Description	
Note	

Measurement

Description	
Start	2019-07-01 10:41:52
Stop	2019-07-01 10:56:52
Duration	00:15:00.0
Run Time	00:15:00.0
Pause	00:00:00.0
Pre Calibration	2019-07-01 10:19:11
Post Calibration	None
Calibration Deviation	---

Overall Settings

RMS Weight	A Weighting		
Peak Weight	A Weighting		
Detector	Slow		
Preamp	PRMLxT2B		
Microphone Correction	Off		
Integration Method	Exponential		
Overload	144.7 dB		
	A	C	Z
Under Range Peak	101.0	98.0	103.0 dB
Under Range Limit	50.0	48.0	56.0 dB
Noise Floor	36.8	37.5	45.1 dB

Results

LASeq	54.2 dB	
LASE	83.8 dB	
EAS	26.584 $\mu\text{Pa}^2\text{h}$	
EAS8	850.703 $\mu\text{Pa}^2\text{h}$	
EAS40	4.254 mPa^2h	
LASpeak (max)	2019-07-01 10:46:27	95.4 dB
LASmax	2019-07-01 10:46:45	68.6 dB
LASmin	2019-07-01 10:49:45	43.5 dB
SEA	-99.9 dB	
LAS > 85.0 dB (Exceedance Counts / Duration)	0	0.0 s
LAS > 115.0 dB (Exceedance Counts / Duration)	0	0.0 s
LASpeak > 135.0 dB (Exceedance Counts / Duration)	0	0.0 s
LASpeak > 137.0 dB (Exceedance Counts / Duration)	0	0.0 s
LASpeak > 140.0 dB (Exceedance Counts / Duration)	0	0.0 s
LCSeq	63.8 dB	
LASeq	54.2 dB	
LCSeq - LASeq	9.6 dB	
LAleq	59.0 dB	
LAeq	54.2 dB	
LAleq - LAeq	4.8 dB	

Summary

File Name on Meter	R9
File Name on PC	SLM_0004285_LxT_Data_116.00.ldbin
Serial Number	0004285
Model	SoundTrack LxT®
Firmware Version	2.302
User	
Location	
Job Description	
Note	

Measurement

Description	
Start	2019-07-01 10:21:52
Stop	2019-07-01 10:36:52
Duration	00:15:00.0
Run Time	00:15:00.0
Pause	00:00:00.0
Pre Calibration	2019-07-01 10:19:12
Post Calibration	None
Calibration Deviation	---

Overall Settings

RMS Weight	A Weighting		
Peak Weight	A Weighting		
Detector	Slow		
Preamp	PRMLxT2B		
Microphone Correction	Off		
Integration Method	Exponential		
Overload	144.7 dB		
	A	C	Z
Under Range Peak	101.0	98.0	103.0 dB
Under Range Limit	50.0	48.0	56.0 dB
Noise Floor	36.8	37.5	45.1 dB

Results

LASeq	57.9 dB	
LASE	87.4 dB	
EAS	61.383 $\mu\text{Pa}^2\text{h}$	
EAS8	1.964 mPa^2h	
EAS40	9.821 mPa^2h	
LASpeak (max)	2019-07-01 10:31:33	91.2 dB
LASmax	2019-07-01 10:29:23	74.5 dB
LASmin	2019-07-01 10:34:30	45.4 dB
SEA	-99.9 dB	
LAS > 85.0 dB (Exceedance Counts / Duration)	0	0.0 s
LAS > 115.0 dB (Exceedance Counts / Duration)	0	0.0 s
LASpeak > 135.0 dB (Exceedance Counts / Duration)	0	0.0 s
LASpeak > 137.0 dB (Exceedance Counts / Duration)	0	0.0 s
LASpeak > 140.0 dB (Exceedance Counts / Duration)	0	0.0 s

Final

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

Initial Study/Mitigated Negative Declaration
State Clearinghouse No. 2019099076

Prepared for
City of Beverly Hills

November 2019



Final

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

Initial Study/Mitigated Negative Declaration
State Clearinghouse No. 2019099076

Prepared for
City of Beverly Hills

November 2019

626 Wilshire Boulevard
Suite 1100
Los Angeles, CA 90017
213.599.4300
www.esassoc.com



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CHAPTER 1

Introduction to Response to Comments

This Final Initial Study/Mitigated Negative Declaration (Final IS/MND) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code Section 21000 et seq.) and *CEQA Guidelines* (California Code of Regulations Section 15000 et seq.). The Final IS/MND incorporates, by reference, the Draft IS/MND (State Clearinghouse No. 2019099076) prepared by the City of Beverly Hills (City) for the La Brea Subarea Well and Transmission Main Project (proposed project), as it was originally published and the following chapters, which include revisions made to the Draft IS/MND.

1.1 CEQA Requirements

Before the City may approve the project, it must certify that the Final IS/MND: a) has been completed in compliance with CEQA; b) was presented to the City Council who reviewed and considered it prior to approving the project; and c) reflects the City's independent judgment and analysis.

A Final IS/MND shall consist of the following:

- The Draft IS/MND or a revision of that draft;
- Comments and recommendations received on the Draft IS/MND;
- A list of persons, organizations, and public agencies commenting on the Draft IS/MND;
- The response of the Lead Agency to significant environmental points raised in the review and consultation process; and
- Any other information added by the Lead Agency.

This Final IS/MND for the proposed project presents Chapter 1 through Chapter 4:

- Chapter 1: Introduction and CEQA process
- Chapter 2: A list of persons, organizations, and public agencies commenting on the Draft IS/MND, and the written comments received on the Draft IS/MND
- Chapter 3: Written responses to each comment identified in Chapter 2
- Chapter 4: Mitigation Monitoring and Reporting Program

1.2 CEQA Process

Public Participation Process

Notice of Intent

The Notice of Intent (NOI) to adopt an IS/MND was posted on September 23, 2019 with the County Clerk in Los Angeles. The Draft IS/MND was circulated for a 30-day public review until October 23, 2019. The Draft IS/MND was circulated to federal, State, and local agencies and interested parties requesting a copy of the Draft IS/MND. Copies of the Draft IS/MND were made available to the public at the following locations:

- City of Beverly Hills Web Site: <http://www.beverlyhills.org/lcwell>
- Beverly Hills Public Library, 444 N. Rexford Drive, Beverly Hills, CA 90210;
- Beverly Hills Public Works Building, 345 Foothill Road, Beverly Hills, CA 90210
- Palms-Ranch Park Branch Library, 2920 Overland Avenue, Los Angeles, CA, 90064
- Fairfax Branch Library, 161 S. Gardner Street, Los Angeles, CA, 90036; and
- Robertson Branch Library, 1719 S. Robertson Boulevard, Los Angeles, CA, 90035.

1.3 Evaluation and Response to Comments

The City, as the Lead Agency, will evaluate comments on environmental issues received from parties that have reviewed the Draft IS/MND and, although not required to do so, intends to prepare written responses.

1.4 Final IS/MND Certification and Approval

Prior to considering the project for approval, the City, as the Lead Agency, will review and consider the information presented in the Final IS/MND and will certify that the Final IS/MND:

- (a) Has been completed in compliance with CEQA;
- (b) Has been presented to the City Council as the decision-making body for the Lead Agency, which reviewed and considered it prior to approving the project; and
- (c) Reflects the City's independent judgment and analysis.

1.5 Notice of Determination

Pursuant to Section 15094 of the *CEQA Guidelines*, the City will file a Notice of Determination (NOD) with the Office of Planning and Research and Los Angeles County Clerk within five working days of project approval.

CHAPTER 2

Comment Letters

The Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the La Brea Subarea Well and Transmission Main Project (proposed project) was circulated for public review for 30 days (September 23, 2019 through October 23, 2019) in accordance with the requirements of *CEQA*. The City received four comment letters and six verbal comments (over the phone) during the public review period, which are listed in **Table 2-1** and included within this chapter. The letters have been marked with brackets that delineate comments pertaining to environmental issues and the information and analysis contained in the Draft IS/MND. Responses to such comments are provided in Chapter 3.

TABLE 2-1
COMMENT LETTERS RECEIVED

Comment No.	Commenting Agency	Date of Comment
1	State Clearinghouse, Office of Planning and Research	October 23, 2019
2	California Department of Transportation (CalTrans), District 7	October 22, 2019
3	Los Angeles County Metropolitan Transportation Authority (Metro)	October 22, 2019
4	South Coast Air Quality Management District (SCAQMD)	October 22, 2019
5	Call Log	
	<ul style="list-style-type: none"> Kimberly Terry Sheryl Lori Laboy Norman Zafman Sylvia Ashly Fatima Choudury (Caltrans) 	Various September 24, 2019 through October 22, 2019



Gavin Newsom
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Kate Gordon
Director

October 23, 2019

Tristan Malabanan
Beverly Hills, City of
345 Foothill Road
Beverly Hills, CA 90210

Subject: La Brea Subarea Well and Transmission Main Project
SCH#: 2019099076

Dear Tristan Malabanan:

The State Clearinghouse submitted the above named MND to selected state agencies for review. The review period closed on 10/22/2019, and the comments from the responding agency (ies) is (are) available on the CEQA database for your retrieval and use. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

Check the CEQA database for submitted comments for use in preparing your final environmental document: <https://ceqanet.opr.ca.gov/2019099076/2> . Should you need more information or clarification of the comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

cc: Resources Agency

1-A

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

Gavin Newsom, Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 7 – Office of Regional Planning
 100 S. MAIN STREET, MS 16
 LOS ANGELES, CA 90012
 PHONE (213) 897-0475
 FAX (213) 897-1337
 TTY 711
 www.dot.ca.gov



Making Conservation
 a California Way of Life.

Governor's Office of Planning & Research

OCT 22 2019**STATE CLEARINGHOUSE**

October 22, 2019

Tristan Malabanan
 City of Beverly Hills
 345 Foothill Road
 Beverly Hills, CA 90210

RE: La Brea Subarea Well and Transmission
 Main Project – Mitigated Negative
 Declaration (MND)
 SCH # 2019099076
 GTS # 07-LA-2019-02840
 Vic. LA-10/PM: R8.831
 LA-187/PM: 8.648

Dear Tristan Malabanan:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced MND. 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. The City of Beverly Hills is the Lead Agency under the California Environmental Quality Act (CEQA).

The nearest State facilities to the proposed project are Interstate 10 (I-10) and State Route 187 (SR-187). Specifically, the project is located approximately 2,000 feet from the I-10 & SR-187 interchange near S La Cienega Boulevard.

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

The following information is for your consideration.

Caltrans appreciates the efforts of this project to minimize construction traffic, such as by conducting nighttime construction of the transmission main. If construction traffic is expected to cause delays on any State facilities, please submit the Traffic Control Plan detailing these delays, as well as information on a Truck Haul Route Program, for Caltrans' review. In addition, strategies should be identified in the Traffic Control Plan to ensure that truck deliveries during project design and construction are conducted in an efficient manner that does not cause transportation conflicts with other vehicles, pedestrians, or bicyclists.

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

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

2-A

2-B

2-C

Tristan Malabanan
October 22, 2019
Page 2 of 2

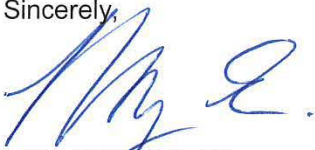
ensure maximum safety conditions for pedestrians, cyclists, and motorists.

Also, Senate Bill 743 (2013) mandates that VMT be used as the primary metric in identifying transportation impacts of all future development projects under CEQA, starting July 1, 2020. For information on determining transportation impacts in terms of VMT on the State Highway System, see the Technical Advisory on Evaluating Transportation Impacts in CEQA by the California Governor's Office of Planning and Research, dated December 2018: http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.

Finally, storm-water runoff is a sensitive issue for Los Angeles County and needs to be considered during project design.

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at Emily.Gibson@dot.ca.gov, and refer to GTS # 07-LA-2019-02840.

Sincerely,



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

2-C



Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

October 22, 2019

Tristan Malabanan, P.E., Project Manager
Department of Public Works, Engineering Division
City of Beverly Hills
345 Foothill Road
Beverly Hills, CA 90210
Sent by Email: askpw@beverlyhills.org

RE: La Brea Subarea Well and Transmission Main Project:
Mitigated Negative Declaration (MND)

Dear Mr. Malabanan:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed La Brea Subarea Well and Transmission Main Project (Project) in the City of Beverly Hills (City). Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive developments to grow ridership, reduce driving, and promote walkable neighborhoods.

The purpose of this letter is to outline recommendations from Metro concerning issues that are germane to our agency's statutory responsibility in relation to the Metro Purple Line Extension Section One and Two and Metro bus facilities and services, which may be affected by the proposed Project. In addition to the specific comments outlined below, Metro would like to provide the City with two resources: 1) the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro-owned right-of-way (ROW) and 2) the Adjacent Construction Manual with technical information (also attached). These documents and additional resources are available at www.metro.net/projects/devreview/.

Project Description

The Project is adjacent to Metro bus service and the Purple Line Extension under construction, and includes construction of a groundwater production well in the La Brea Subarea, the rehabilitation of existing (inactive) 18- and 24- inch pipelines, and the connection of the rehabilitated pipelines to a newly constructed raw water transmission main with a diameter of 16 inches.

The proposed Well Site would be implemented on a Beverly Hills-owned property located at 1956 Chariton Street. The proposed transmission main in its entirety would be approximately four miles long. The proposed rehabilitation area of the transmission main would proceed north within La Cienega Boulevard to Olympic Boulevard, then west through the Frank Fenton Field at La Cienega Park. The alignment in Beverly Hills will continue north on Le Doux Road, then west on Clifton Way 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

3-A

3-B

La Brea Subarea Well and Transmission Main Project
MND – Metro Comments
October 23, 2019

Way, until turning north on North Palm Drive, then continue westward on 3rd street, and finally through the City yard to connect to the utilities inlet side of the Foothill Water Treatment Plant (WTP).

3-B

Comments

Bus Stop Adjacency

1. Service: Metro Bus Line 105 operates on La Cienega Boulevard, adjacent to the Project. One Metro Bus stop is in proximity to the Project at La Cienega and Guthrie Avenue. Other transit operators may provide service in this area and should be consulted.
2. Impact Analysis: The MND should analyze potential effects on Metro Bus service and identify mitigation measures or project design features as appropriate. Potential impacts may include construction traffic, operation of and shipment/deliveries to the completed Project, and temporary or permanent bus service rerouting.
3. Bus Operations Contacts: Please contact Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro's Stops and Zones Department at 213-922-5190 with any questions and at least 30 days in advance of initiating construction activities. Other municipal bus services may also be impacted and should be included in construction outreach efforts.

3-C

Subway Adjacency

1. Operations: The Metro Westside Purple Line Extension Section One and Two are currently under construction in the vicinity of the Project. Once in operation, peak service as often as ten minutes in both directions. Trains may operate in and out of revenue service, 24 hours a day, seven days a week in the tunnels adjacent to the Project.
2. Impact Analysis: Due to the Project's proximity to the Purple Line tunnel intersecting at Wilshire Boulevard and North Le Doux Road, the City is encouraged to contact Metro staff early in the design process to plan for potential impacts. The MND should analyze potential effects on subway construction and identify mitigation measures or project design features as appropriate. Metro recommends that the following provisions be used to develop a mitigation measure and/or project design feature that addresses these potential impacts:
 - a. Haul Route: The construction of the Project may impact haul routes on La Cienega Boulevard for the Purple Line Extension Two (i.e. lane closures) that have been approved by both the City of Beverly Hills and the City of Los Angeles. Metro would appreciate assistance in coordinating any modifications to the haul route necessitated by the Project.
 - b. Technical Review: The City shall require its construction contractor to shall submit site plans, engineering drawings and calculations, as well as construction work plans and methods, including any crane placement and radius, to evaluate any impacts to the Metro Purple Line infrastructure in relationship to the Project. The City shall ensure that its construction contractor will obtain Metro's approval of final construction drawings before commencement of any construction activities for the Project.

3-D

La Brea Subarea Well and Transmission Main Project
MND – Metro Comments
October 23, 2019

- c. Construction Safety: The construction and operation of the Project shall not disrupt the construction activities of the Metro Purple Line or the structural and systems integrity of Metro's tunnels. Not less than two months before commencement of construction activities, the City's construction contractor shall initiate with Metro Purple Line construction staff. During Project construction the City's construction contractor shall work in close coordination with Metro to ensure that structural integrity is not compromised by construction activities or permanent build conditions. The City's construction contractor shall permit Metro staff to monitor construction activities to ascertain any impact to the Purple Line.

3-D

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

3-E

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

Sincerely,



Shine Ling, AICP
Manager, Transit Oriented Communities

Attachments and links:

- Adjacent Construction Design Manual
- Adjacent Development Handbook: <https://www.metro.net/projects/devreview/>

SENT VIA E-MAIL AND USPS:

October 22, 2019

askpw@beverlyhills.org

Tristan Malabanan, P.E., Project Manager
City of Beverly Hills, Department of Public Works
Engineering Division
345 Foothill Road
Beverly Hills, California 90210

**Mitigated Negative Declaration (MND) for the Proposed
La Brea Subarea Well and Transmission Project**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final MND.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish an existing structure and rehabilitate an existing 10,250 linear feet of water pipelines ranging in diameter from 18 inches to 24 inches (Proposed Project). The Proposed Project will also include construction of a four-mile water pipeline 16 inches in diameter and a 700-gallon-per-minute water well. The Proposed Project is located along Burton Way, Le Doux Road, and La Cienega Boulevard from the northeast corner of Chariton Street and Guthrie Avenue in the City of Los Angeles to the northeast corner of La Cienega Boulevard and Cadillac Avenue in the City of Beverly Hills. Construction of the Proposed Project is anticipated to take up to 13 months, becoming operational in Winter of 2020¹. The well equipping (grading²) and the rehabilitation/transmissions main installation (building construction³) construction phases are estimated to take seven and eight months to complete, respectively⁴, and construction activities from both phases will occur adjacent to existing sensitive receptors⁵.

4-A

South Coast AQMD Staff's Summary of the Air Quality Analysis

In the Air Quality Analysis Section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's regional construction and operational impacts would be less than significant⁶. Based on the localized air quality analysis, the Lead Agency found that the Proposed Project would result in localized PM2.5 emissions at 2.9 pounds per day (lbs/day)⁷, which did not exceed South Coast AQMD's localized air quality CEQA significance threshold for PM2.5 at 3 lbs/day. As such, no air quality mitigation was included⁸.

4-B

¹ MND. Section 2.0 Project Description. Page 12.

² MND. Appendix A: Air Quality, Greenhouse Gas, and Energy Information. CalEEMod Summer Run. PDF page 42.

³ *Ibid.*

⁴ MND. Section 2.0 Project Description. Page 12.

⁵ MND. Section 4.3 Air Quality. Pages 33 through 36.

⁶ *Ibid.* Pages 28 through 37.

⁷ *Ibid.*

⁸ *Ibid.*

Recommended Mitigation Measure for Localized Air Quality Impacts from Construction

While the Proposed Project's localized PM_{2.5} construction emissions (i.e., approximately 2.9 lbs/day) did not exceed South Coast AQMD's localized air quality CEQA significance threshold for PM_{2.5} at 3 lbs/day for one acre with sensitive receptors at 25 meters in Source Receptor Area 2 (Northwest Coastal LA County), they were slightly below the applicable significance threshold. Therefore, to further reduce PM_{2.5} emissions during construction and to ensure that nearby sensitive receptors are not adversely affected by the emissions from the use of off-road diesel-powered construction equipment that will occur adjacent to sensitive receptors, South Coast AQMD staff recommends that the Lead Agency incorporate the following mitigation measure into the Final MND.

Tier 4 Construction Equipment or Level 3 Diesel-Particulate Filters

To further reduce PM_{2.5} emissions during construction and minimize their impacts on nearby residents, South Coast AQMD staff recommends that the Lead Agency require the use of off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (USEPA) Tier 4 Final off-road emissions standards for equipment rated at 50 horsepower or greater during construction of the Proposed Project. Such equipment will be outfitted with Best Available Control Technology (BACT) devices including a CARB certified Level 3 Diesel Particulate Filter (DPFs). Level 3 DPFs are capable of achieving at least 85 percent reduction in particulate matter emissions⁹. A list of CARB verified DPFs are available on the CARB website¹⁰.

To ensure that Tier 4 Final construction equipment or better would be used during the Proposed Project's construction, South Coast AQMD staff recommends that the Lead Agency include this requirement in applicable bid documents, purchase orders, and contracts. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. A copy of each unit's certified tier specification or model year specification and CARB or South Coast AQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. Additionally, the Lead Agency should require periodic reporting and provision of written construction documents by construction contractor(s) to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance.

In the event that construction equipment cannot meet the Tier 4 Final engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim or Tier 3 emission standards, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project, and/or limiting construction phases occurring simultaneously.

Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, responses should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful,

⁹ CARB. November 16-17, 2004. *Diesel Off-Road Equipment Measure – Workshop*. Page 17. Accessed at: https://www.arb.ca.gov/msprog/ordiesel/presentations/nov16-04_workshop.pdf.

¹⁰ *Ibid*. Page 18.

4-C

4-D

informative, or useful to decision makers and the public who are interested in the Proposed Project. Further, when the Lead Agency makes the finding that the additional recommended mitigation measure is not feasible, the Lead Agency should describe the specific reasons for rejecting them in the Final EIR (CEQA Guidelines Section 15091).

↑
4-D

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

4-E
↓

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:AM

LAC190924-04

Control Number

Date	Name	Questions/Comments
9/24/2019	Kimberly Terry	<ul style="list-style-type: none"> Why not put the line on Robertson? Where is all the traffic going to go? Is Beverly Hills allowed to take water from LA? Is LA okay with that?
9/24/2019	Sheryl	<ul style="list-style-type: none"> Where is the existing pipe on La Cienega? What's the timing of construction?
9/26/2019	Lori Laboy	<ul style="list-style-type: none"> Why are you replacing an 18 to 24" line with a 16" line? How long will the construction take and when will it start?
10/2/2019	Norman Zafman	<ul style="list-style-type: none"> Expressed concerns about pipeline on Le Doux between Gregory & Charleville.
10/22/2019	Sylvia Ashly	<ul style="list-style-type: none"> Concerned about chemicals & chemical treatment. Against of chemical treatment and potential pollutants at that site.
10/22/2019	Fatima Choudury (Caltrans)	<ul style="list-style-type: none"> Concerned because the map shows a blue dot near the onramp of the freeway.

5-A

5-B

5-C

5-D

5-E

5-F

CHAPTER 3

Responses to Comments

A summary of the comments contained within the comment letters received during the public review period for the Draft Initial Study/Mitigated Negative Declaration (IS/MND) is included in this section (see Chapter 2). The City provides individual responses to the bracketed comments in each letter. Where the responses indicate additions or deletions to the text of the Draft IS/MND, additions are indicated in underline and deletions in ~~strikeout~~.

Letter 1: State Clearinghouse, Office of Planning and Research

Comment 1-A

The comment acknowledges the State Clearinghouse distributed the IS/MND as required under CEQA to pertinent agencies. The Caltrans comment letter is attached.

Response 1-A

The comment is noted and saved in the project record. No response is required because there are no specific comments on the contents in the Draft IS/MND. The Caltrans letter is responded to as Letter 2 below.

Letter 2: California Department of Transportation (Caltrans), District 7

Comment 2-A

The comment acknowledges receipt of the Draft IS/MND and reiterates the project description.

Response 2-A

No response is required because there are no specific comments on the contents in the Draft IS/MND.

Comment 2-B

The comment explains which State facilities are closest to the project area and that Caltrans does not expect project approval to result in direct impacts to those facilities.

Response 2-B

The comment is noted and saved in the project file. No response is required because there are no specific comments on the contents in the Draft IS/MND.

Comment 2-C

The comment requests that if construction traffic is expected to cause delays on State facilities, a Traffic Control Plan be submitted to Caltrans. The comment then explains that any construction that requires the transportation of heavy equipment on State highways would require a permit. The comment recommends that large size truck trips be limited to off-peak commute periods to minimize congestion and ensure maximum safety conditions for pedestrians, cyclists, and motorists. Further, the comment reiterates Senate Bill 743 and how to identify traffic impacts starting July 1, 2020. Lastly, the comment states that storm-water runoff is a sensitive issue for LA County and needs to be considered during project design. The comment closes with providing Caltrans contact information.

Response 2-C

Section 4.17, Transportation, of the Draft IS/MND describes potential impacts including delays within the project area. No project delays are anticipated on any Caltrans facilities. If for some reason, the transportation of heavy construction equipment requires the use of oversized-transport vehicles on State highways, the City will ensure that the appropriate Caltrans transportation permit is acquired. The commenter notes that strategies should be identified in the Traffic Control Plan to ensure deliveries during design and construction do not cause traffic conflicts. Pages 105-107 of the Draft IS/MND describe how the City will control such construction traffic and indicate the City will cooperate with other agencies in formulating a Traffic Control Plan. Mitigation Measure TR-1 explains how the City will coordinate with the appropriate agencies before and during construction to ensure that congestion is minimized for pedestrians, cyclists and motorists. In response to the comment, Mitigation Measure TR-1 has been revised to include Caltrans as an agency that will be consulted, as appropriate, in the formation of the Traffic Control Plan, on Page 107 of the Draft IS/MND:

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, Los Angeles County, Metro, and Caltrans, 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.

Section 4.17(b) of the Draft IS/MND discusses transportation impacts in terms of vehicle miles travelled and indicates that the project would not result in any perceivable increase in vehicle miles traveled that would exceed a threshold of significance either during construction or during implementation. Last, the commenter does not raise any impacts associated with storm water runoff, but suggests that such issues be considered. The potential impacts regarding storm-water runoff are considered and are discussed in detail in Sections 4.7 and 4.10 of the Draft IS/MND. The project will 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 will 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. Section 4.19, Utilities and Service Systems, discusses why the project does not require expanded storm water drainage systems. Thus, the Draft IS/MND adequately addresses storm water runoff issues. The City appreciates the contact information for Caltrans and will coordinate in the future, if necessary.

Letter 3: Los Angeles County Metropolitan Transportation Authority (Metro)

Comment 3-A

The comment acknowledges receipt of the Draft IS/MND and summarizes the purpose of the letter – to outline recommendations from Metro. The comment also provides two Metro resources.

Response 3-A

The City appreciates the guidance documents provided by Metro. The documents are saved in the project record. No response is required because there are no specific comments on the contents in the Draft IS/MND.

Comment 3-B

The comment reiterates the project description and mentions that the project is adjacent to the Purple Line Extension that is currently under construction.

Response 3-B

No response is required because there are no specific comments on the contents in the Draft IS/MND.

Comment 3-C

The comment explains that the proposed transmission main is located adjacent to bus stops and that transit operators in the immediate area should be consulted. The comment explains that the MND should analyze potential effects on Metro Bus service, including construction traffic, operation of and shipment/deliveries to the completed project, and temporary or permanent bus service rerouting. The comment then provides Metro Bus contacts and states that construction outreach efforts should be initiated 30 days prior to construction starts.

Response 3-C

As described on Page 105 of the Draft IS/MND within the Transportation Section, the City is aware of Metro's bus services at La Cienega/Guthrie and along the length of La Cienega Boulevard. The Draft IS/MND analyses potential traffic impacts, which would include such Metro services. In order to minimize potential impacts to bus services, nighttime construction will be implemented along La Cienega as much as possible. Furthermore, as described in Section 2, Project Description, the required construction equipment for various stages of construction would be staged in areas adjacent to public rights-of-ways or within the Well Site boundary, and would be temporary in nature. Construction equipment would not be traveling to and from the project sites day-to-day. Bus services could experience increased travel times if buses 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. No full lane closures are anticipated to occur under the proposed project; therefore, no alternative bus routes would be required during the duration of construction activities for the project. Implementation of Mitigation Measure TR-1 would prepare the Traffic Control Plan one for the proposed transmission main. The Traffic Control Plan will assist motorists, including public transit through construction areas. As described on Page 106 of the Draft IS/MND, 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. Specifically, the City will ensure that the project's contractor will coordinate with Metro Bus Operations staff with any questions and to ensure they receive ample notice of delays at least 30 days in advance of construction activities. Metro coordination efforts will be included in construction contractor specifications. Thus, the Draft IS/MND identifies mitigation measures for any potential impacts on Metro buses. Further, as described on Page 107 of the Draft IS/MND, once the project is operational there will not be an expected increase in vehicle trips to the project location. There would be no impacts, or less than significant traffic impacts, associated with the operation of and shipment/deliveries to the completed project location.

Additionally, in response to the comment, Mitigation Measure TR-1 has been revised to include Metro as an agency that will be consulted, as appropriate, in the formation of the Traffic Control Plan, on page 107 of the Draft IS/MND;

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, Los Angeles County, Metro, and Caltrans, 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.

Comment 3-D

The comment states that the project is located adjacent to the Metro Westside Purple Line extension. The comment highly encourages City staff to contact Metro staff early in the design process to ensure potential impacts to the Purple Line tunnel intersection at Wilshire Boulevard and North Le Doux Road are minimized. The comment then recommends mitigation measures/project design features to address potential impacts such as: coordinating with Metro along haul routes; construction contractor should submit site plans, engineering drawings and other documentation to Metro for approval before construction; and that the City's construction contractor shall permit Metro staff to monitor construction activities to ascertain impacts to the Purple Line.

Response 3-D

The City appreciates the information provided regarding the Metro Purple Line work that is currently underway. To address concerns with Metro's Purple Line (subway) work, specifically, Page 105 in Section 4.17 of the Draft IS/MND has been revised as follows:

- 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 and subway 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. While, Metro's Purple Line (subway) is located within the project area near the proposed transmission main. It should be noted that Metro is currently working on the Purple Line within the City of Los Angeles.

The proposed transmission main rehabilitation and new construction areas were specifically designed to avoid impacts to the Metro Purple Line construction work and future operations. The areas in which the proposed transmission main would be implemented along North Le Doux Road, specifically, would utilize slip-lining techniques which would minimize disturbance to areas near Metro facilities. Slip-lining construction involves installing a new pipe within an existing host pipe using trenchless construction methods to cross Wilshire Boulevard. Slip-lining eliminates the need for active construction areas which would require partial lane/road closures, which could impact traffic.

Further, the City of Beverly Hills and their contractor will coordinate with Metro during the construction design and planning, including the development of a Traffic Control Plan (see Mitigation Measure TR-1, below). This will ensure that Metro's Purple Line work is not adversely impacted and that Metro's work will not interfere with the proposed transmission main, once implemented. As such, the project would not significantly impact Purple Line construction haul routes or construction activities.

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.

As the comment recommends, the City's contractor will coordinate with Metro no less than two months prior to construction activities and can accommodate Metro staff to monitor construction activities that may take place near the Metro Purple Line. Metro coordination efforts will be included in construction contractor specifications.

Comment 3-E

The comment provides a final contact if there are any questions regarding Metro's comment letter.

Response 3-E

The contact information is saved to the project record. The City will contact the number provided if any questions arise.

Letter 4: South Coast Air Quality Management District (SCAQMD)

Comment 4-A

The comment acknowledges receipt of the Draft IS/MND and reiterates the project description.

Response 4-A

No response is required because there are no specific comments on the contents in the Draft IS/MND.

Comment 4-B

The comment summarizes the significance determinations of the proposed project in regards to the air quality analysis.

Response 4-B

No response is required because there are no specific comments on the contents in the Draft IS/MND.

Comment 4-C

Although the emissions were below the applicable significance threshold, the commenter nonetheless recommends the adoption of an additional mitigation measure for the Final MND. The commenter recommends that all off-road diesel-powered construction equipment meet or exceed Tier 4 off-road emissions standards for equipment rated 50 horsepower or greater during construction. The commenter recommends the Lead Agency require that each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) be available upon request and require periodic reporting. Additionally, the commenter recommends that the Lead Agency require written documentation by contractors to ensure compliance and conduct regular inspections to ensure compliance.

Response 4-C

This comment is noted and saved in the project record. Section 4.3 of the Draft IS/MND addresses air quality. The air quality analysis for the proposed project assumes Tier 3-compliant equipment would be used. As shown on Page 33 in Table 3 of the Draft IS/MND, maximum daily construction emissions would not exceed SCAQMD daily significance thresholds with utilization of Tier 3-compliant equipment. No mitigation measures are required to reduce emissions to less-than-significant levels. Pursuant to CEQA Guidelines Section 15126.4(a)(3), mitigation measures are not required for effects which are not found to be significant. Thus, there is no requirement to incorporate the commenter's proposed mitigation measure requiring the use of Tier 4 construction equipment.

Nonetheless, the City will recommend that Tier 4 compliant equipment be utilized where such equipment is reasonably available at reasonable economic terms, to ensure maximum reduction in emissions. Further, in the event that Tier 4 equipment is not used, the City will recommend the following best practices: construction equipment with Tier 4 Interim or Tier 3 emission standards be used; reduction in the number and/or horsepower rating of construction equipment; limiting the number of daily construction haul truck trips to and from the proposed project; and/or limiting construction phases occurring simultaneously. This information will be included in construction contractor specifications.

Comment 4-D

The comment requests that written responses to their comments are received during the public review process, pursuant to CEQA Guidelines Section 15074.

Response 4-D

The comment is noted and saved in the project record. The City will provide SCAQMD with a response to their comments.

Comment 4-E

The comment provides a SCAQMD contact for any questions.

Response 4-E

The comment is noted and saved in the project record. The City will coordinate with the SCAQMD, as necessary.

Letter 5: Call Log

Comment 5-A

The comment was via phone call by Kimberly Terry. She asked why the transmission line would not be placed on Robertson Boulevard and inquired about where the traffic would go. She then asked if the City of Beverly Hills is allowed to take water from the City of Los Angeles, and whether the City of Los Angeles would allow this.

Response 5-A

The proposed transmission line was specifically designed to avoid and/or minimize potential impacts to existing utilities underground within the project area and local vicinity. An alignment analysis was conducted under a separate study in 2015 that evaluated La Cienega Boulevard, Robertson Boulevard, and a westerly route through neighborhood streets. The alignment in La Cienega Boulevard was determined to have the least construction impacts due to the slip-lining construction method proposed which reduces excavation. The option in Robertson Boulevard would require “open-cut” construction methods and would have a greater impact to the community. Thus, because it had lower construction impacts, the La Cienega route was selected over the Robertson Boulevard route. As a result of the project construction, there is the potential

for some traffic delays. As described in Section 4.17 of the Draft IS/MND, Transportation, the project would be required to implement Mitigation Measure TR-1, which includes specific Traffic Control Plans for project components. These plans would re-route some traffic and would ensure that traffic would be minimized as much as possible and provide motorists with detours and safety design measures. The Traffic Control Plans will be reviewed by multiple applicable jurisdictions including the City of Los Angeles, the City of Beverly Hills, Caltrans and Metro.

Furthermore, as described in Section 2.1 of the Draft IS/MND Project Description, the La Brea Subarea within the Central Basin is not adjudicated. That is, there are no various stipulations on utilization of groundwater in this area. Further, the City of Beverly Hills has a history of implementing groundwater wells within the La Brea Subarea. The City of Los Angeles is a Responsible Agency under CEQA for the project's IS/MND, and the City of Beverly Hills has been and intends to continue to coordinate with the City of Los Angeles, as necessary. Groundwater modeling and extensive research has been conducted within the La Brea Subarea to ensure the safe yield of the Subbasin (see Section 4.10, Hydrology and Water Quality for more details).

Comment 5-B

The comment was via phone call by Sheryl. She asked where the existing pipe on La Cienega is located and asked about the timing of construction.

Response 5-B

As described in Section 2.3 of the Draft IS/MND's Project Description, the existing 18- and 24-inch transmission main areas that will be rehabilitated are located within La Cienega Boulevard to Olympic Boulevard and within Le Doux Road from Gregory Way to Clifton Way. Please refer to Figure 2 of the Draft IS/MND. The existing transmission main is illustrated with a dashed purple line, as denoted in the figure legend.

Section 2.5.1 of the Draft IS/MND provides information regarding the project's construction schedule. Project construction would take place for approximately 13 months, from Winter 2020 through Summer 2021, with several activities potentially occurring in parallel. Construction activities would occur during nighttime and on weekends for the 24-hour drilling of the production well, 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, and 8:00 a.m., and 6:00 p.m., Saturdays. No work is allowed on Sundays and federal holidays.

To document these changes to schedule and construction timing, Page 12 of the Draft IS/MND has been revised as follows:

Project construction would take place for approximately 13 months, from ~~Fall 2019 through Winter 2020~~, through Summer 2021, 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~~ 7:00 p.m., Monday through Friday except on federal holidays.

Comment 5-C

The comment was via phone call by Lori Laboy. She asked why 18- and 24-inch lines are being replaced with 16-inch lines, and inquired about how long construction will take and when it will start.

Response 5-C

The transmission main rehabilitation and construction are discussed on pages 14 and 15 of the Draft IS/MND. The proposed transmission main was designed to accommodate proposed groundwater well flows to the Foothill Water Treatment Plant. A larger diameter pipeline is not required. The 18-inch and 24-inch pipelines are not in service. They are acting as host pipes for the slip-lining construction method. The slip-lining method maximizes the internal diameter of the pipe, which maximizes the benefit of utilizing the existing inactive 18 and 24-inch inch transmission main. The difference in pipeline sizes is being accounted for in the design of the new facilities.

Please refer to Response 5-B, above for information about construction.

Comment 5-D

The comment was via phone call from Norman Zafman. He expressed concerns about the pipeline being located on Le Doux between Gregory and Charleville.

Response 5-D

This area of proposed transmission main construction would include a slip-lining technique, which includes minimal disturbance to the roadway above and surrounding areas. Locating the pipeline in Le Doux Road was chosen because of the availability of utilizing inactive pipelines to act as host pipes for the slip-lining technique, which reduces construction impacts compared to constructing using “open-cut” trenching methods which would be required on a parallel street.

Comment 5-E

The comment was via phone call from Sylvia Ashly. She expressed concern about chemical treatments and is against chemical treatment and potential pollutants onsite.

Response 5-E

The Draft IS/MND addresses water treatment and impacts by pollutants. As noted throughout the Draft IS/MND, all groundwater extracted at the proposed Well Site would be sent to the City's existing Foothill Water Treatment Plant where it will be treated to State drinking water standards. Further, the Draft IS/MND addresses potential pollutants onsite. Section 4.9, Hazards and Hazardous Materials, addresses how hazardous materials will be handled on site. And Section 4.10, Hydrology and Water Quality, indicates that 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, which requires the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP). The objectives of a SWPPP is to identify pollutant sources that may affect the quality of storm water discharge and to implement best management practices (BMPs) to reduce pollutants in storm water.

Comment 5-F

The comment was via phone call from Fatima Choudary with Caltrans. She was concerned the project figures showed existing utilities near the onramp to the freeway.

Response 5-F

Figure 2 of the Draft IS/MND illustrates a zoomed-out area of the project vicinity and proposed components. Existing and proposed project facilities would not be located on or near Caltrans facilities and would not interfere with day-to-day Caltrans operations. The project does not include an access point immediately adjacent to the freeway. The access point would likely be located adjacent to the proposed Well Site, near the intersection of Guthrie Avenue and Chariton Street.

CHAPTER 4

Corrections and Additions to the Draft IS/MND

Section 4.1 Introduction

This chapter contains a compilation of revisions made to the text of the Draft IS/MND by the City as the Lead Agency, in response to the comments received during the 30-day public review period as well as minor edits. All revisions are previously introduced in Chapter 3 of this Final IS/MND but are summarized here for convenience of the reader. Where the responses indicate additions or deletions to the text of the Draft IS/MND, additions are indicated in underline and deletions in ~~strikeout~~.

Page 12

Project construction would take place for approximately 13 months, from ~~Fall 2019 through Winter 2020, through Summer 2021~~, 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~~9:00 p.m., Monday through Friday except on federal holidays.

Page 105

- 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 and subway 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. While, Metro's Purple Line (subway) is located within the project area near the proposed transmission main. It should be noted that Metro is currently working on the Purple Line within the City of Los Angeles.

The proposed transmission main rehabilitation and new construction areas were specifically designed to avoid impacts to the Metro Purple Line construction work and future operations. The areas in which the proposed transmission main would be implemented along North Le Doux Road, specifically, would utilize slip-lining techniques which would minimize disturbance to areas near Metro facilities. Slip-lining construction involves installing a new pipe within an existing host pipe using trenchless construction methods to cross Wilshire Boulevard. Slip-lining eliminates the need for active construction areas which would require partial lane/road closures, which could impact traffic.

Further, the City of Beverly Hills and their contractor will coordinate with Metro during the construction design and planning, including the development of a Traffic Control Plan (see Mitigation Measure TR-1, below). This will ensure that Metro's Purple Line work is not adversely impacted and that Metro's work will not interfere with the proposed transmission main, once implemented. As such, the project would not significantly impact Purple Line construction haul routes or construction activities.

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).

Page 107

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, Los Angeles County, Metro, and Caltrans, 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.

CHAPTER 5

Mitigation Monitoring and Reporting Program

5.1 CEQA Requirements

Section 15091(d) and Section 15097 of the CEQA Guidelines require a public agency to adopt a program for monitoring or reporting on the changes it has required in the project or conditions of approval to substantially lessen significant environmental effects. This Mitigation, Monitoring and Reporting Program (MMRP) summarizes the mitigation commitments identified in the La Brea Subarea Well and Transmission Main Project (proposed project) (State Clearinghouse No. 2019099076). Mitigation measures are presented in the same order as they occur in the Final IS/MND.

The columns in the MMRP table provide the following information:

- **Mitigation Measure(s):** The action(s) that will be taken to reduce the impact to a less-than-significant level.
- **Implementation, Monitoring, and Reporting Action:** The appropriate steps to implement and document compliance with the mitigation measures.
- **Responsibility:** The agency or private entity responsible for ensuring implementation of the mitigation measure. However, until the mitigation measures are completed, the City, as the CEQA Lead Agency, remains responsible for ensuring that implementation of the mitigation measures occur in accordance with the MMRP (CEQA Guidelines, Section 15097(a)).
- **Monitoring Schedule:** The general schedule for conducting each task, either prior to construction, during construction and/or after construction.

TABLE 5-1
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE LA BREA SUBAREA WELL AND TRANSMISSION MAIN PROJECT

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
Biological Resources			
<p>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:</p> <ol style="list-style-type: none"> 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 If avoidance of the avian nesting season (February 15 through August 31) is not feasible then the following shall occur: <ol style="list-style-type: none"> 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. 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. 	<ul style="list-style-type: none"> Include mitigation measure in construction contractor specifications. Retain copies of the survey(s) in the project file. Prepare reports to document any nesting bird species prior to construction activities. Perform additional survey(s) if there is a lapse of construction activities for seven days or more. Prepare reports to document any nesting bird species prior to resuming construction activities. Retain surveys and reports in the project file. 	The City; Construction Contractor	Before and During Construction

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
Cultural Resources			
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.	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain documentation of retaining a qualified archaeologist in the project file. 	The City; Construction Contractor	Before and During Construction
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.	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain documentation demonstrating attendance of construction personnel to cultural resources sensitivity training. 	The City; Construction Contractor	Before and During Construction
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.	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Perform site inspections to ensure compliance with cultural sensitivity requirements. • Retain all archeological and tribal inspection forms in the project file. • Retain copy of final archaeological report in the project file. 	The City; Construction Contractor	Before and During Construction

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
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.	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Perform site inspections to ensure compliance with cultural sensitivity requirements. • Retain inspection forms in the project file. • Retain correspondence between archeologist and Native American representative. • Retain a copy of Archeological Resources Treatment Plan (if one is required) in the project file. 	The City; Construction Contractor	Before and During Construction
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.	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain inspection forms in the project file. • Retain NAHC correspondence in project files, if necessary. 	The City; Construction Contractor	Before and During Construction
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.	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain documentation of retaining a qualified paleontologist in the project file. 	The City; Construction Contractor	Before and During Construction
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.	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain documentation demonstrating attendance of construction personnel to paleontological resources training. 	The City; Construction Contractor	Before and During Construction

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
<p>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.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain copies of all paleontological research, survey and PRMP in the project file. • Perform site monitoring to ensure compliance with paleontological requirements. • Retain inspection forms in the project file. 	The City; Construction Contractor	Before and During Construction
<p>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.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Paleontological monitoring reports and logs will be retained in project file. • Retain fossil recovery logs in the project file. 	The City; Construction Contractor	Before and During Construction
Hazards and Hazardous Materials			
<p>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.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain copies of all environmental site assessments in the project file. 	The City; Construction Contractor	Before Construction

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
<p>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.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain copies of Soil and Groundwater Management Plan in the project file. • Perform site inspections to verify contractor compliance with hazardous materials. • Retain inspection forms in the project file. 	The City; Construction Contractor	Before and During Construction
<p>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.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain a qualified consultant to prepare a Traffic Control Plan that is consistent with the Los Angeles County Operational Area Emergency Response Plan. • Retain copies of written notifications in the project file. • Retain copies of the Traffic Control Plan in the project file. 	The City; Construction Contractor	Before Construction
Noise			
<p>NOISE-1: Prior to construction, the City of Beverly Hills shall ensure that the contractor specifications stipulate that:</p> <ul style="list-style-type: none"> • 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. <p>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.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain a qualified construction monitor to conduct routine inspections of noise reduction measures during project construction. • Maintain written inspection records in the project file to verify compliance. 	The City; Construction Contractor	Before Construction
<p>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.</p> <ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain a qualified Noise Disturbance Coordinator to implement the mitigation measure. • Maintain written documentation of all noise complaints and the resolution of complaints in the project file. 	The City; Construction Contractor	During and After Construction

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
<ul style="list-style-type: none"> 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. <p>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.</p>			
<p>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, Leq 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).</p>	<ul style="list-style-type: none"> Include mitigation measure in construction contractor specifications. Maintain written documentation of offered noise mitigation measures in the project file. 	The City; Construction Contractor	During Construction
<p>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.</p>	<ul style="list-style-type: none"> Include mitigation measure in construction contractor specifications. Maintain written documentation of all construction coordination in the project file. 	The City; Construction Contractor	Before and During Construction
<p>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.</p>	<ul style="list-style-type: none"> Include mitigation measure in construction contractor specifications. Retain a qualified construction monitor to conduct routine inspections of vibration reduction measures during project construction. Retain documentation required by the mitigation measure. Maintain written inspection records in the project file to verify compliance. 	The City; Construction Contractor	During Construction

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
Transportation			
<p>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.</p> <p>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, Los Angeles County, Metro, and Caltrans, 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.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain copies of all correspondence with the City of Los Angeles and the City of Beverly Hills in the project file. • Retain copies of the Traffic Control/Traffic Management Plan in the project file. • Retain a qualified construction monitor to conduct routine inspections of traffic control measures during project construction. • Maintain a record of collected information and written notifications in the project file. • Maintain written inspection records in the project file to verify compliance. 	The City; Construction Contractor	Before and During Construction

RESOLUTION NO. 19-R-13261

RESOLUTION OF THE COUNCIL OF THE CITY OF BEVERLY HILLS ADOPTING A MITIGATED NEGATIVE DECLARATION PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT FOR THE IMPLEMENTATION OF THE LA BREA SUBAREA WELL AND TRANSMISSION MAIN PROJECT

WHEREAS, to expand local water supply, the City of Beverly Hills (“City”) proposes to implement the La Brea Subarea Well and Transmission Main Project (“proposed Project” or “Project”); and

WHEREAS, the Project would include the construction of a groundwater production well in the La Brea Subarea on City-owned property located at 1956 Chariton Street in the City of Los Angeles, the rehabilitation of existing inactive 18 and 24-inch pipelines along La Cienega Boulevard in the cities of Beverly Hills and Los Angeles, 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 for treatment and supply; and

WHEREAS, the City, acting as the lead agency, has prepared environmental documentation for the whole of a contemplated Project consisting of the above referenced component parts, and as further described in the Final Initial Study/Mitigated Negative Declaration (“Final IS/MND”), attached hereto as Exhibit A and incorporated herein by reference; and

WHEREAS, an Initial Study and Mitigated Negative Declaration were prepared for the Project by the City, pursuant to the requirements of the California Environmental Quality Act (CEQA, Public Resources Code sections 21000-21177), CEQA Guidelines (14 California Code of Regulations sections 15000-15387), and other applicable requirements; and

WHEREAS, on September 19, 2019, the City, after undertaking an Initial Study to provide the public with information about the potential effects on the local and regional environment associated with the proposed Project, found that there will not be a significant effect on the environment (the City) in this case because revisions in the Project have been made by or agreed to by the Project proponent and because of the incorporation and implementation of proposed Project mitigation measures, and determined that a Mitigated Negative Declaration would be prepared; and

WHEREAS, the Notice of Intent to Adopt a Mitigated Negative Declaration and the Initial Study completed for the Project was duly noticed and circulated for a 30-day public review period from September 23, 2019 through October 23, 2019; and

WHEREAS, during the public review and comment period, the City received four comment letters from public agencies, and six verbal comments from comments members of the general public and public agency staff; and

WHEREAS, although not required to do so, the City has prepared responses to each of the comments received during the public comment period on the Notice of Intent to Adopt a Mitigated Negative Declaration and Initial Study, and prepared a Final IS/MND, that includes the draft Mitigated Negative Declaration documentation, the comments received in response to the Notice of Intent to Adopt a Mitigated Negative Declaration during the public comment period, responses to those comments, and a Mitigation Monitoring and Reporting Program; and

WHEREAS, the documents, staff reports, technical studies, appendices, plans, specifications, and other materials that constitute the record of proceedings upon which this resolution and any action on the Project and the Final IS/MND is based are on file for public examination during normal business hours at the City of Beverly Hills Department of Public Works, Engineering Division, 345 Foothill Road, Beverly Hills, CA 90210.

NOW, THEREFORE, THE COUNCIL OF THE CITY OF BEVERLY HILLS DOES HEREBY RESOLVE, DECLARE, DETERMINE AND ORDER AS FOLLOWS:

Section 1. The City Council incorporates the recitals set forth above as if restated herein in their entirety.

Section 2. The City Council of the City, as the lead agency for the Project, has considered the Final IS/MND, dated November 2019 (State Clearing House No. 2019099076), along with all comments received during the public review period, and the responses to the comments that are contained in the Final IS/MND.

Section 3. The City Council finds, in its independent judgment after considering all relevant evidence in the record of proceedings for the Project, including without limitation the information set forth in the Final IS/MND, that there is not substantial evidence supporting a fair argument that the Project may actually produce any significant environmental impacts that cannot be mitigated to a less than significant level through implementation of those mitigation

measures identified in the Final IS/MND. Therefore, the Council finds that the Project will not have a significant environmental effect.

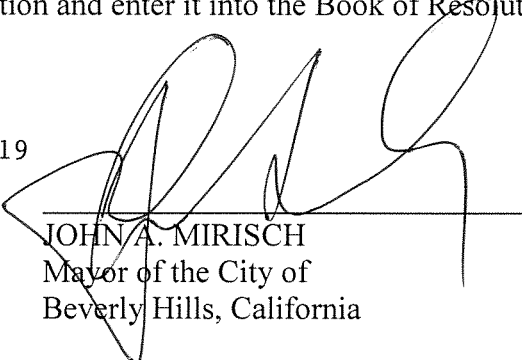
Section 4. The City Council finds that the Final IS/MND reflects the City Council's independent judgment and analysis.

Section 5. For the foregoing reasons and based on the information and findings included in the record before the City Council, including the Staff Report, the Initial Study, the studies that have been conducted to evaluate whether the Project would cause significant environmental impacts, the proposed Mitigated Negative Declaration, and the Mitigation Monitoring and Reporting Program, all of which are incorporated herein by this reference, the City Council of the City of Beverly Hills hereby certifies that the Final IS/MND has been prepared in compliance with CEQA, adopts the Final IS/MND and adopts the attached Mitigation Monitoring and Reporting Program, as set forth in Chapter 5 of the Final IS/MND, which is attached hereto as Exhibit A, making all mitigation measures fully applicable to the Project.

Section 6. The City Council hereby directs staff to prepare a Notice of Determination and file that Notice with the County Clerk in accordance with Section 15075(d) of the California Environmental Quality Act Guidelines.

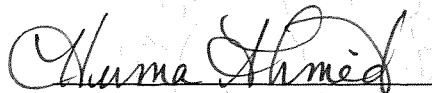
Section 7. This Resolution shall be effective upon adoption. The City Clerk shall testify to the passage and adoption of this Resolution and enter it into the Book of Resolutions of the City.

ADOPTED: November 19, 2019



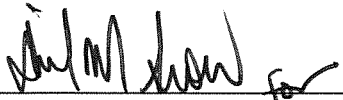
JOHN A. MIRISCH
Mayor of the City of
Beverly Hills, California

ATTEST:



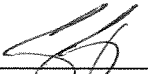
(SEAL)
HUMA AHMED
City Clerk

APPROVED AS TO FORM:



LAURENCE S. WIENER
City Attorney

APPROVED AS CONTENT:



GEORGE CHAVEZ
City Manager

Exhibit A

Final Initial Study/Mitigated Negative Declaration

Final

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

Initial Study/Mitigated Negative Declaration
State Clearinghouse No. 2019099076

Prepared for
City of Beverly Hills

November 2019



Final

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

Initial Study/Mitigated Negative Declaration
State Clearinghouse No. 2019099076

Prepared for
City of Beverly Hills

November 2019

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CHAPTER 1

Introduction to Response to Comments

This Final Initial Study/Mitigated Negative Declaration (Final IS/MND) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code Section 21000 et seq.) and *CEQA Guidelines* (California Code of Regulations Section 15000 et seq.). The Final IS/MND incorporates, by reference, the Draft IS/MND (State Clearinghouse No. 2019099076) prepared by the City of Beverly Hills (City) for the La Brea Subarea Well and Transmission Main Project (proposed project), as it was originally published and the following chapters, which include revisions made to the Draft IS/MND.

1.1 CEQA Requirements

Before the City may approve the project, it must certify that the Final IS/MND: a) has been completed in compliance with CEQA; b) was presented to the City Council who reviewed and considered it prior to approving the project; and c) reflects the City's independent judgment and analysis.

A Final IS/MND shall consist of the following:

- The Draft IS/MND or a revision of that draft;
- Comments and recommendations received on the Draft IS/MND;
- A list of persons, organizations, and public agencies commenting on the Draft IS/MND;
- The response of the Lead Agency to significant environmental points raised in the review and consultation process; and
- Any other information added by the Lead Agency.

This Final IS/MND for the proposed project presents Chapter 1 through Chapter 4:

- Chapter 1: Introduction and CEQA process
- Chapter 2: A list of persons, organizations, and public agencies commenting on the Draft IS/MND, and the written comments received on the Draft IS/MND
- Chapter 3: Written responses to each comment identified in Chapter 2
- Chapter 4: Mitigation Monitoring and Reporting Program

1.2 CEQA Process

Public Participation Process

Notice of Intent

The Notice of Intent (NOI) to adopt an IS/MND was posted on September 23, 2019 with the County Clerk in Los Angeles. The Draft IS/MND was circulated for a 30-day public review until October 23, 2019. The Draft IS/MND was circulated to federal, State, and local agencies and interested parties requesting a copy of the Draft IS/MND. Copies of the Draft IS/MND were made available to the public at the following locations:

- City of Beverly Hills Web Site: <http://www.beverlyhills.org/lcwell>
- Beverly Hills Public Library, 444 N. Rexford Drive, Beverly Hills, CA 90210;
- Beverly Hills Public Works Building, 345 Foothill Road, Beverly Hills, CA 90210
- Palms-Ranch Park Branch Library, 2920 Overland Avenue, Los Angeles, CA, 90064
- Fairfax Branch Library, 161 S. Gardner Street, Los Angeles, CA, 90036; and
- Robertson Branch Library, 1719 S. Robertson Boulevard, Los Angeles, CA, 90035.

1.3 Evaluation and Response to Comments

The City, as the Lead Agency, will evaluate comments on environmental issues received from parties that have reviewed the Draft IS/MND and, although not required to do so, intends to prepare written responses.

1.4 Final IS/MND Certification and Approval

Prior to considering the project for approval, the City, as the Lead Agency, will review and consider the information presented in the Final IS/MND and will certify that the Final IS/MND:

- (a) Has been completed in compliance with CEQA;
- (b) Has been presented to the City Council as the decision-making body for the Lead Agency, which reviewed and considered it prior to approving the project; and
- (c) Reflects the City's independent judgment and analysis.

1.5 Notice of Determination

Pursuant to Section 15094 of the *CEQA Guidelines*, the City will file a Notice of Determination (NOD) with the Office of Planning and Research and Los Angeles County Clerk within five working days of project approval.

CHAPTER 2

Comment Letters

The Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the La Brea Subarea Well and Transmission Main Project (proposed project) was circulated for public review for 30 days (September 23, 2019 through October 23, 2019) in accordance with the requirements of *CEQA*. The City received four comment letters and six verbal comments (over the phone) during the public review period, which are listed in **Table 2-1** and included within this chapter. The letters have been marked with brackets that delineate comments pertaining to environmental issues and the information and analysis contained in the Draft IS/MND. Responses to such comments are provided in Chapter 3.

TABLE 2-1
COMMENT LETTERS RECEIVED

Comment No.	Commenting Agency	Date of Comment
1	State Clearinghouse, Office of Planning and Research	October 23, 2019
2	California Department of Transportation (CalTrans), District 7	October 22, 2019
3	Los Angeles County Metropolitan Transportation Authority (Metro)	October 22, 2019
4	South Coast Air Quality Management District (SCAQMD)	October 22, 2019
5	Call Log	
	<ul style="list-style-type: none"> Kimberly Terry Sheryl Lori Laboy Norman Zafman Sylvia Ashly Fatima Choudury (Caltrans) 	Various September 24, 2019 through October 22, 2019

Gavin Newsom
GovernorSTATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning UnitKate Gordon
Director

October 23, 2019

Tristan Malabanan
Beverly Hills, City of
345 Foothill Road
Beverly Hills, CA 90210Subject: La Brea Subarea Well and Transmission Main Project
SCH#: 2019099076

Dear Tristan Malabanan:

The State Clearinghouse submitted the above named MND to selected state agencies for review. The review period closed on 10/22/2019, and the comments from the responding agency (ies) is (are) available on the CEQA database for your retrieval and use. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

Check the CEQA database for submitted comments for use in preparing your final environmental document: <https://ceqanet.opr.ca.gov/2019099076/2> . Should you need more information or clarification of the comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

cc: Resources Agency

1-A

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

Gavin Newsom, Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 7 – Office of Regional Planning
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-0475
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



Making Conservation
a California Way of Life.

Governor's Office of Planning & Research

OCT 22 2019**STATE CLEARINGHOUSE**

October 22, 2019

Tristan Malabanan
City of Beverly Hills
345 Foothill Road
Beverly Hills, CA 90210

RE: La Brea Subarea Well and Transmission
Main Project – Mitigated Negative
Declaration (MND)
SCH # 2019099076
GTS # 07-LA-2019-02840
Vic. LA-10/PM: R8.831
LA-187/PM: 8.648

Dear Tristan Malabanan:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced MND. 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. The City of Beverly Hills is the Lead Agency under the California Environmental Quality Act (CEQA).

The nearest State facilities to the proposed project are Interstate 10 (I-10) and State Route 187 (SR-187). Specifically, the project is located approximately 2,000 feet from the I-10 & SR-187 interchange near S La Cienega Boulevard.

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

The following information is for your consideration.

Caltrans appreciates the efforts of this project to minimize construction traffic, such as by conducting nighttime construction of the transmission main. If construction traffic is expected to cause delays on any State facilities, please submit the Traffic Control Plan detailing these delays, as well as information on a Truck Haul Route Program, for Caltrans' review. In addition, strategies should be identified in the Traffic Control Plan to ensure that truck deliveries during project design and construction are conducted in an efficient manner that does not cause transportation conflicts with other vehicles, pedestrians, or bicyclists.

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

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

2-A

2-B

2-C

Tristan Malabanan
October 22, 2019
Page 2 of 2

ensure maximum safety conditions for pedestrians, cyclists, and motorists.

Also, Senate Bill 743 (2013) mandates that VMT be used as the primary metric in identifying transportation impacts of all future development projects under CEQA, starting July 1, 2020. For information on determining transportation impacts in terms of VMT on the State Highway System, see the Technical Advisory on Evaluating Transportation Impacts in CEQA by the California Governor's Office of Planning and Research, dated December 2018: http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.

Finally, storm-water runoff is a sensitive issue for Los Angeles County and needs to be considered during project design.

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at Emily.Gibson@dot.ca.gov, and refer to GTS # 07-LA-2019-02840.

Sincerely,



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

2-C



Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

October 22, 2019

Tristan Malabanan, P.E., Project Manager
Department of Public Works, Engineering Division
City of Beverly Hills
345 Foothill Road
Beverly Hills, CA 90210
Sent by Email: askpw@beverlyhills.org

RE: La Brea Subarea Well and Transmission Main Project:
Mitigated Negative Declaration (MND)

Dear Mr. Malabanan:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed La Brea Subarea Well and Transmission Main Project (Project) in the City of Beverly Hills (City). Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive developments to grow ridership, reduce driving, and promote walkable neighborhoods.

The purpose of this letter is to outline recommendations from Metro concerning issues that are germane to our agency's statutory responsibility in relation to the Metro Purple Line Extension Section One and Two and Metro bus facilities and services, which may be affected by the proposed Project. In addition to the specific comments outlined below, Metro would like to provide the City with two resources: 1) the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro-owned right-of-way (ROW) and 2) the Adjacent Construction Manual with technical information (also attached). These documents and additional resources are available at www.metro.net/projects/devreview/.

3-A

Project Description

The Project is adjacent to Metro bus service and the Purple Line Extension under construction, and includes construction of a groundwater production well in the La Brea Subarea, the rehabilitation of existing (inactive) 18- and 24- inch pipelines, and the connection of the rehabilitated pipelines to a newly constructed raw water transmission main with a diameter of 16 inches.

The proposed Well Site would be implemented on a Beverly Hills-owned property located at 1956 Chariton Street. The proposed transmission main in its entirety would be approximately four miles long. The proposed rehabilitation area of the transmission main would proceed north within La Cienega Boulevard to Olympic Boulevard, then west through the Frank Fenton Field at La Cienega Park. The alignment in Beverly Hills will continue north on Le Doux Road, then west on Clifton Way 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

3-B

La Brea Subarea Well and Transmission Main Project
MND – Metro Comments
October 23, 2019

Way, until turning north on North Palm Drive, then continue westward on 3rd street, and finally through the City yard to connect to the utilities inlet side of the Foothill Water Treatment Plant (WTP).

3-B

Comments

Bus Stop Adjacency

1. Service: Metro Bus Line 105 operates on La Cienega Boulevard, adjacent to the Project. One Metro Bus stop is in proximity to the Project at La Cienega and Guthrie Avenue. Other transit operators may provide service in this area and should be consulted.
2. Impact Analysis: The MND should analyze potential effects on Metro Bus service and identify mitigation measures or project design features as appropriate. Potential impacts may include construction traffic, operation of and shipment/deliveries to the completed Project, and temporary or permanent bus service rerouting.
3. Bus Operations Contacts: Please contact Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro's Stops and Zones Department at 213-922-5190 with any questions and at least 30 days in advance of initiating construction activities. Other municipal bus services may also be impacted and should be included in construction outreach efforts.

3-C

Subway Adjacency

1. Operations: The Metro Westside Purple Line Extension Section One and Two are currently under construction in the vicinity of the Project. Once in operation, peak service as often as ten minutes in both directions. Trains may operate in and out of revenue service, 24 hours a day, seven days a week in the tunnels adjacent to the Project.
2. Impact Analysis: Due to the Project's proximity to the Purple Line tunnel intersecting at Wilshire Boulevard and North Le Doux Road, the City is encouraged to contact Metro staff early in the design process to plan for potential impacts. The MND should analyze potential effects on subway construction and identify mitigation measures or project design features as appropriate. Metro recommends that the following provisions be used to develop a mitigation measure and/or project design feature that addresses these potential impacts:
 - a. Haul Route: The construction of the Project may impact haul routes on La Cienega Boulevard for the Purple Line Extension Two (i.e. lane closures) that have been approved by both the City of Beverly Hills and the City of Los Angeles. Metro would appreciate assistance in coordinating any modifications to the haul route necessitated by the Project.
 - b. Technical Review: The City shall require its construction contractor to shall submit site plans, engineering drawings and calculations, as well as construction work plans and methods, including any crane placement and radius, to evaluate any impacts to the Metro Purple Line infrastructure in relationship to the Project. The City shall ensure that its construction contractor will obtain Metro's approval of final construction drawings before commencement of any construction activities for the Project.

3-D

La Brea Subarea Well and Transmission Main Project
MND – Metro Comments
October 23, 2019

- c. Construction Safety: The construction and operation of the Project shall not disrupt the construction activities of the Metro Purple Line or the structural and systems integrity of Metro's tunnels. Not less than two months before commencement of construction activities, the City's construction contractor shall initiate with Metro Purple Line construction staff. During Project construction the City's construction contractor shall work in close coordination with Metro to ensure that structural integrity is not compromised by construction activities or permanent build conditions. The City's construction contractor shall permit Metro staff to monitor construction activities to ascertain any impact to the Purple Line.

3-D

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

3-E

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

Sincerely,



Shine Ling, AICP
Manager, Transit Oriented Communities

Attachments and links:

- Adjacent Construction Design Manual
- Adjacent Development Handbook: <https://www.metro.net/projects/devreview/>



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

October 22, 2019

askpw@beverlyhills.org

Tristan Malabanan, P.E., Project Manager
City of Beverly Hills, Department of Public Works
Engineering Division
345 Foothill Road
Beverly Hills, California 90210

Mitigated Negative Declaration (MND) for the Proposed La Brea Subarea Well and Transmission Project

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final MND.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish an existing structure and rehabilitate an existing 10,250 linear feet of water pipelines ranging in diameter from 18 inches to 24 inches (Proposed Project). The Proposed Project will also include construction of a four-mile water pipeline 16 inches in diameter and a 700-gallon-per-minute water well. The Proposed Project is located along Burton Way, Le Doux Road, and La Cienega Boulevard from the northeast corner of Chariton Street and Guthrie Avenue in the City of Los Angeles to the northeast corner of La Cienega Boulevard and Cadillac Avenue in the City of Beverly Hills. Construction of the Proposed Project is anticipated to take up to 13 months, becoming operational in Winter of 2020¹. The well equipping (grading²) and the rehabilitation/transmissions main installation (building construction³) construction phases are estimated to take seven and eight months to complete, respectively⁴, and construction activities from both phases will occur adjacent to existing sensitive receptors⁵.

4-A

South Coast AQMD Staff's Summary of the Air Quality Analysis

In the Air Quality Analysis Section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's regional construction and operational impacts would be less than significant⁶. Based on the localized air quality analysis, the Lead Agency found that the Proposed Project would result in localized PM2.5 emissions at 2.9 pounds per day (lbs/day)⁷, which did not exceed South Coast AQMD's localized air quality CEQA significance threshold for PM2.5 at 3 lbs/day. As such, no air quality mitigation was included⁸.

4-B

¹ MND. Section 2.0 Project Description. Page 12.

² MND. Appendix A: Air Quality, Greenhouse Gas, and Energy Information. CalEEMod Summer Run. PDF page 42.

³ *Ibid.*

⁴ MND. Section 2.0 Project Description. Page 12.

⁵ MND. Section 4.3 Air Quality. Pages 33 through 36.

⁶ *Ibid.* Pages 28 through 37.

⁷ *Ibid.*

⁸ *Ibid.*

Tristan Malabanan

Recommended Mitigation Measure for Localized Air Quality Impacts from Construction

While the Proposed Project's localized PM_{2.5} construction emissions (i.e., approximately 2.9 lbs/day) did not exceed South Coast AQMD's localized air quality CEQA significance threshold for PM_{2.5} at 3 lbs/day for one acre with sensitive receptors at 25 meters in Source Receptor Area 2 (Northwest Coastal LA County), they were slightly below the applicable significance threshold. Therefore, to further reduce PM_{2.5} emissions during construction and to ensure that nearby sensitive receptors are not adversely affected by the emissions from the use of off-road diesel-powered construction equipment that will occur adjacent to sensitive receptors, South Coast AQMD staff recommends that the Lead Agency incorporate the following mitigation measure into the Final MND.

Tier 4 Construction Equipment or Level 3 Diesel-Particulate Filters

To further reduce PM_{2.5} emissions during construction and minimize their impacts on nearby residents, South Coast AQMD staff recommends that the Lead Agency require the use of off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (USEPA) Tier 4 Final off-road emissions standards for equipment rated at 50 horsepower or greater during construction of the Proposed Project. Such equipment will be outfitted with Best Available Control Technology (BACT) devices including a CARB certified Level 3 Diesel Particulate Filter (DPFs). Level 3 DPFs are capable of achieving at least 85 percent reduction in particulate matter emissions⁹. A list of CARB verified DPFs are available on the CARB website¹⁰.

To ensure that Tier 4 Final construction equipment or better would be used during the Proposed Project's construction, South Coast AQMD staff recommends that the Lead Agency include this requirement in applicable bid documents, purchase orders, and contracts. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. A copy of each unit's certified tier specification or model year specification and CARB or South Coast AQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. Additionally, the Lead Agency should require periodic reporting and provision of written construction documents by construction contractor(s) to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance.

In the event that construction equipment cannot meet the Tier 4 Final engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim or Tier 3 emission standards, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project, and/or limiting construction phases occurring simultaneously.

Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, responses should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful,

⁹ CARB. November 16-17, 2004. *Diesel Off-Road Equipment Measure – Workshop*. Page 17. Accessed at: https://www.arb.ca.gov/msprog/ordiesel/presentations/nov16-04_workshop.pdf.

¹⁰ *Ibid*. Page 18.

Tristan Malabanan

informative, or useful to decision makers and the public who are interested in the Proposed Project. Further, when the Lead Agency makes the finding that the additional recommended mitigation measure is not feasible, the Lead Agency should describe the specific reasons for rejecting them in the Final EIR (CEQA Guidelines Section 15091).

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4-D

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

4-E
↓

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:AM

LAC190924-04

Control Number

Date	Name	Questions/Comments	
9/24/2019	Kimberly Terry	<ul style="list-style-type: none"> Why not put the line on Robertson? Where is all the traffic going to go? Is Beverly Hills allowed to take water from LA? Is LA okay with that? 	5-A
9/24/2019	Sheryl	<ul style="list-style-type: none"> Where is the existing pipe on La Cienega? What's the timing of construction? 	5-B
9/26/2019	Lori Laboy	<ul style="list-style-type: none"> Why are you replacing an 18 to 24" line with a 16" line? How long will the construction take and when will it start? 	5-C
10/2/2019	Norman Zafman	<ul style="list-style-type: none"> Expressed concerns about pipeline on Le Doux between Gregory & Charleville. 	5-D
10/22/2019	Sylvia Ashly	<ul style="list-style-type: none"> Concerned about chemicals & chemical treatment. Against of chemical treatment and potential pollutants at that site. 	5-E
10/22/2019	Fatima Choudury (Caltrans)	<ul style="list-style-type: none"> Concerned because the map shows a blue dot near the onramp of the freeway. 	5-F

CHAPTER 3

Responses to Comments

A summary of the comments contained within the comment letters received during the public review period for the Draft Initial Study/Mitigated Negative Declaration (IS/MND) is included in this section (see Chapter 2). The City provides individual responses to the bracketed comments in each letter. Where the responses indicate additions or deletions to the text of the Draft IS/MND, additions are indicated in underline and deletions in ~~strikeout~~.

Letter 1: State Clearinghouse, Office of Planning and Research

Comment 1-A

The comment acknowledges the State Clearinghouse distributed the IS/MND as required under CEQA to pertinent agencies. The Caltrans comment letter is attached.

Response 1-A

The comment is noted and saved in the project record. No response is required because there are no specific comments on the contents in the Draft IS/MND. The Caltrans letter is responded to as Letter 2 below.

Letter 2: California Department of Transportation (Caltrans), District 7

Comment 2-A

The comment acknowledges receipt of the Draft IS/MND and reiterates the project description.

Response 2-A

No response is required because there are no specific comments on the contents in the Draft IS/MND.

Comment 2-B

The comment explains which State facilities are closest to the project area and that Caltrans does not expect project approval to result in direct impacts to those facilities.

Response 2-B

The comment is noted and saved in the project file. No response is required because there are no specific comments on the contents in the Draft IS/MND.

Comment 2-C

The comment requests that if construction traffic is expected to cause delays on State facilities, a Traffic Control Plan be submitted to Caltrans. The comment then explains that any construction that requires the transportation of heavy equipment on State highways would require a permit. The comment recommends that large size truck trips be limited to off-peak commute periods to minimize congestion and ensure maximum safety conditions for pedestrians, cyclists, and motorists. Further, the comment reiterates Senate Bill 743 and how to identify traffic impacts starting July 1, 2020. Lastly, the comment states that storm-water runoff is a sensitive issue for LA County and needs to be considered during project design. The comment closes with providing Caltrans contact information.

Response 2-C

Section 4.17, Transportation, of the Draft IS/MND describes potential impacts including delays within the project area. No project delays are anticipated on any Caltrans facilities. If for some reason, the transportation of heavy construction equipment requires the use of oversized-transport vehicles on State highways, the City will ensure that the appropriate Caltrans transportation permit is acquired. The commenter notes that strategies should be identified in the Traffic Control Plan to ensure deliveries during design and construction do not cause traffic conflicts. Pages 105-107 of the Draft IS/MND describe how the City will control such construction traffic and indicate the City will cooperate with other agencies in formulating a Traffic Control Plan. Mitigation Measure TR-1 explains how the City will coordinate with the appropriate agencies before and during construction to ensure that congestion is minimized for pedestrians, cyclists and motorists. In response to the comment, Mitigation Measure TR-1 has been revised to include Caltrans as an agency that will be consulted, as appropriate, in the formation of the Traffic Control Plan, on Page 107 of the Draft IS/MND:

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, Los Angeles County, Metro, and Caltrans, 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.

Section 4.17(b) of the Draft IS/MND discusses transportation impacts in terms of vehicle miles travelled and indicates that the project would not result in any perceivable increase in vehicle miles traveled that would exceed a threshold of significance either during construction or during implementation. Last, the commenter does not raise any impacts associated with storm water runoff, but suggests that such issues be considered. The potential impacts regarding storm-water runoff are considered and are discussed in detail in Sections 4.7 and 4.10 of the Draft IS/MND. The project will 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 will 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. Section 4.19, Utilities and Service Systems, discusses why the project does not require expanded storm water drainage systems. Thus, the Draft IS/MND adequately addresses storm water runoff issues. The City appreciates the contact information for Caltrans and will coordinate in the future, if necessary.

Letter 3: Los Angeles County Metropolitan Transportation Authority (Metro)

Comment 3-A

The comment acknowledges receipt of the Draft IS/MND and summarizes the purpose of the letter – to outline recommendations from Metro. The comment also provides two Metro resources.

Response 3-A

The City appreciates the guidance documents provided by Metro. The documents are saved in the project record. No response is required because there are no specific comments on the contents in the Draft IS/MND.

Comment 3-B

The comment reiterates the project description and mentions that the project is adjacent to the Purple Line Extension that is currently under construction.

Response 3-B

No response is required because there are no specific comments on the contents in the Draft IS/MND.

Comment 3-C

The comment explains that the proposed transmission main is located adjacent to bus stops and that transit operators in the immediate area should be consulted. The comment explains that the MND should analyze potential effects on Metro Bus service, including construction traffic, operation of and shipment/deliveries to the completed project, and temporary or permanent bus service rerouting. The comment then provides Metro Bus contacts and states that construction outreach efforts should be initiated 30 days prior to construction starts.

Response 3-C

As described on Page 105 of the Draft IS/MND within the Transportation Section, the City is aware of Metro's bus services at La Cienega/Guthrie and along the length of La Cienega Boulevard. The Draft IS/MND analyses potential traffic impacts, which would include such Metro services. In order to minimize potential impacts to bus services, nighttime construction will be implemented along La Cienega as much as possible. Furthermore, as described in Section 2, Project Description, the required construction equipment for various stages of construction would be staged in areas adjacent to public rights-of-ways or within the Well Site boundary, and would be temporary in nature. Construction equipment would not be traveling to and from the project sites day-to-day. Bus services could experience increased travel times if buses 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. No full lane closures are anticipated to occur under the proposed project; therefore, no alternative bus routes would be required during the duration of construction activities for the project. Implementation of Mitigation Measure TR-1 would prepare the Traffic Control Plan one for the proposed transmission main. The Traffic Control Plan will assist motorists, including public transit through construction areas. As described on Page 106 of the Draft IS/MND, 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. Specifically, the City will ensure that the project's contractor will coordinate with Metro Bus Operations staff with any questions and to ensure they receive ample notice of delays at least 30 days in advance of construction activities. Metro coordination efforts will be included in construction contractor specifications. Thus, the Draft IS/MND identifies mitigation measures for any potential impacts on Metro buses. Further, as described on Page 107 of the Draft IS/MND, once the project is operational there will not be an expected increase in vehicle trips to the project location. There would be no impacts, or less than significant traffic impacts, associated with the operation of and shipment/deliveries to the completed project location.

Additionally, in response to the comment, Mitigation Measure TR-1 has been revised to include Metro as an agency that will be consulted, as appropriate, in the formation of the Traffic Control Plan, on page 107 of the Draft IS/MND;

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, Los Angeles County, Metro, and Caltrans, 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.

Comment 3-D

The comment states that the project is located adjacent to the Metro Westside Purple Line extension. The comment highly encourages City staff to contact Metro staff early in the design process to ensure potential impacts to the Purple Line tunnel intersection at Wilshire Boulevard and North Le Doux Road are minimized. The comment then recommends mitigation measures/project design features to address potential impacts such as: coordinating with Metro along haul routes; construction contractor should submit site plans, engineering drawings and other documentation to Metro for approval before construction; and that the City's construction contractor shall permit Metro staff to monitor construction activities to ascertain impacts to the Purple Line.

Response 3-D

The City appreciates the information provided regarding the Metro Purple Line work that is currently underway. To address concerns with Metro's Purple Line (subway) work, specifically, Page 105 in Section 4.17 of the Draft IS/MND has been revised as follows:

- 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 and subway 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. While, Metro's Purple Line (subway) is located within the project area near the proposed transmission main. It should be noted that Metro is currently working on the Purple Line within the City of Los Angeles.

The proposed transmission main rehabilitation and new construction areas were specifically designed to avoid impacts to the Metro Purple Line construction work and future operations. The areas in which the proposed transmission main would be implemented along North Le Doux Road, specifically, would utilize slip-lining techniques which would minimize disturbance to areas near Metro facilities. Slip-lining construction involves installing a new pipe within an existing host pipe using trenchless construction methods to cross Wilshire Boulevard. Slip-lining eliminates the need for active construction areas which would require partial lane/road closures, which could impact traffic.

Further, the City of Beverly Hills and their contractor will coordinate with Metro during the construction design and planning, including the development of a Traffic Control Plan (see Mitigation Measure TR-1, below). This will ensure that Metro's Purple Line work is not adversely impacted and that Metro's work will not interfere with the proposed transmission main, once implemented. As such, the project would not significantly impact Purple Line construction haul routes or construction activities.

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.

As the comment recommends, the City's contractor will coordinate with Metro no less than two months prior to construction activities and can accommodate Metro staff to monitor construction activities that may take place near the Metro Purple Line. Metro coordination efforts will be included in construction contractor specifications.

Comment 3-E

The comment provides a final contact if there are any questions regarding Metro's comment letter.

Response 3-E

The contact information is saved to the project record. The City will contact the number provided if any questions arise.

Letter 4: South Coast Air Quality Management District (SCAQMD)

Comment 4-A

The comment acknowledges receipt of the Draft IS/MND and reiterates the project description.

Response 4-A

No response is required because there are no specific comments on the contents in the Draft IS/MND.

Comment 4-B

The comment summarizes the significance determinations of the proposed project in regards to the air quality analysis.

Response 4-B

No response is required because there are no specific comments on the contents in the Draft IS/MND.

Comment 4-C

Although the emissions were below the applicable significance threshold, the commenter nonetheless recommends the adoption of an additional mitigation measure for the Final MND. The commenter recommends that all off-road diesel-powered construction equipment meet or exceed Tier 4 off-road emissions standards for equipment rated 50 horsepower or greater during construction. The commenter recommends the Lead Agency require that each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) be available upon request and require periodic reporting. Additionally, the commenter recommends that the Lead Agency require written documentation by contractors to ensure compliance and conduct regular inspections to ensure compliance.

Response 4-C

This comment is noted and saved in the project record. Section 4.3 of the Draft IS/MND addresses air quality. The air quality analysis for the proposed project assumes Tier 3-compliant equipment would be used. As shown on Page 33 in Table 3 of the Draft IS/MND, maximum daily construction emissions would not exceed SCAQMD daily significance thresholds with utilization of Tier 3-compliant equipment. No mitigation measures are required to reduce emissions to less-than-significant levels. Pursuant to CEQA Guidelines Section 15126.4(a)(3), mitigation measures are not required for effects which are not found to be significant. Thus, there is no requirement to incorporate the commenter's proposed mitigation measure requiring the use of Tier 4 construction equipment.

Nonetheless, the City will recommend that Tier 4 compliant equipment be utilized where such equipment is reasonably available at reasonable economic terms, to ensure maximum reduction in emissions. Further, in the event that Tier 4 equipment is not used, the City will recommend the following best practices: construction equipment with Tier 4 Interim or Tier 3 emission standards be used; reduction in the number and/or horsepower rating of construction equipment; limiting the number of daily construction haul truck trips to and from the proposed project; and/or limiting construction phases occurring simultaneously. This information will be included in construction contractor specifications.

Comment 4-D

The comment requests that written responses to their comments are received during the public review process, pursuant to CEQA Guidelines Section 15074.

Response 4-D

The comment is noted and saved in the project record. The City will provide SCAQMD with a response to their comments.

Comment 4-E

The comment provides a SCAQMD contact for any questions.

Response 4-E

The comment is noted and saved in the project record. The City will coordinate with the SCAQMD, as necessary.

Letter 5: Call Log

Comment 5-A

The comment was via phone call by Kimberly Terry. She asked why the transmission line would not be placed on Robertson Boulevard and inquired about where the traffic would go. She then asked if the City of Beverly Hills is allowed to take water from the City of Los Angeles, and whether the City of Los Angeles would allow this.

Response 5-A

The proposed transmission line was specifically designed to avoid and/or minimize potential impacts to existing utilities underground within the project area and local vicinity. An alignment analysis was conducted under a separate study in 2015 that evaluated La Cienega Boulevard, Robertson Boulevard, and a westerly route through neighborhood streets. The alignment in La Cienega Boulevard was determined to have the least construction impacts due to the slip-lining construction method proposed which reduces excavation. The option in Robertson Boulevard would require “open-cut” construction methods and would have a greater impact to the community. Thus, because it had lower construction impacts, the La Cienega route was selected over the Robertson Boulevard route. As a result of the project construction, there is the potential

for some traffic delays. As described in Section 4.17 of the Draft IS/MND, Transportation, the project would be required to implement Mitigation Measure TR-1, which includes specific Traffic Control Plans for project components. These plans would re-route some traffic and would ensure that traffic would be minimized as much as possible and provide motorists with detours and safety design measures. The Traffic Control Plans will be reviewed by multiple applicable jurisdictions including the City of Los Angeles, the City of Beverly Hills, Caltrans and Metro.

Furthermore, as described in Section 2.1 of the Draft IS/MND Project Description, the La Brea Subarea within the Central Basin is not adjudicated. That is, there are no various stipulations on utilization of groundwater in this area. Further, the City of Beverly Hills has a history of implementing groundwater wells within the La Brea Subarea. The City of Los Angeles is a Responsible Agency under CEQA for the project's IS/MND, and the City of Beverly Hills has been and intends to continue to coordinate with the City of Los Angeles, as necessary. Groundwater modeling and extensive research has been conducted within the La Brea Subarea to ensure the safe yield of the Subbasin (see Section 4.10, Hydrology and Water Quality for more details).

Comment 5-B

The comment was via phone call by Sheryl. She asked where the existing pipe on La Cienega is located and asked about the timing of construction.

Response 5-B

As described in Section 2.3 of the Draft IS/MND's Project Description, the existing 18- and 24-inch transmission main areas that will be rehabilitated are located within La Cienega Boulevard to Olympic Boulevard and within Le Doux Road from Gregory Way to Clifton Way. Please refer to Figure 2 of the Draft IS/MND. The existing transmission main is illustrated with a dashed purple line, as denoted in the figure legend.

Section 2.5.1 of the Draft IS/MND provides information regarding the project's construction schedule. Project construction would take place for approximately 13 months, from Winter 2020 through Summer 2021, with several activities potentially occurring in parallel. Construction activities would occur during nighttime and on weekends for the 24-hour drilling of the production well, 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, and 8:00 a.m., and 6:00 p.m., Saturdays. No work is allowed on Sundays and federal holidays.

To document these changes to schedule and construction timing, Page 12 of the Draft IS/MND has been revised as follows:

Project construction would take place for approximately 13 months, from ~~Fall 2019 through Winter 2020, through Summer 2021~~, 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.

Comment 5-C

The comment was via phone call by Lori Laboy. She asked why 18- and 24-inch lines are being replaced with 16-inch lines, and inquired about how long construction will take and when it will start.

Response 5-C

The transmission main rehabilitation and construction are discussed on pages 14 and 15 of the Draft IS/MND. The proposed transmission main was designed to accommodate proposed groundwater well flows to the Foothill Water Treatment Plant. A larger diameter pipeline is not required. The 18-inch and 24-inch pipelines are not in service. They are acting as host pipes for the slip-lining construction method. The slip-lining method maximizes the internal diameter of the pipe, which maximizes the benefit of utilizing the existing inactive 18 and 24-inch inch transmission main. The difference in pipeline sizes is being accounted for in the design of the new facilities.

Please refer to Response 5-B, above for information about construction.

Comment 5-D

The comment was via phone call from Norman Zafman. He expressed concerns about the pipeline being located on Le Doux between Gregory and Charleville.

Response 5-D

This area of proposed transmission main construction would include a slip-lining technique, which includes minimal disturbance to the roadway above and surrounding areas. Locating the pipeline in Le Doux Road was chosen because of the availability of utilizing inactive pipelines to act as host pipes for the slip-lining technique, which reduces construction impacts compared to constructing using “open-cut” trenching methods which would be required on a parallel street.

Comment 5-E

The comment was via phone call from Sylvia Ashly. She expressed concern about chemical treatments and is against chemical treatment and potential pollutants onsite.

Response 5-E

The Draft IS/MND addresses water treatment and impacts by pollutants. As noted throughout the Draft IS/MND, all groundwater extracted at the proposed Well Site would be sent to the City's existing Foothill Water Treatment Plant where it will be treated to State drinking water standards. Further, the Draft IS/MND addresses potential pollutants onsite. Section 4.9, Hazards and Hazardous Materials, addresses how hazardous materials will be handled on site. And Section 4.10, Hydrology and Water Quality, indicates that 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, which requires the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP). The objectives of a SWPPP is to identify pollutant sources that may affect the quality of storm water discharge and to implement best management practices (BMPs) to reduce pollutants in storm water.

Comment 5-F

The comment was via phone call from Fatima Choudary with Caltrans. She was concerned the project figures showed existing utilities near the onramp to the freeway.

Response 5-F

Figure 2 of the Draft IS/MND illustrates a zoomed-out area of the project vicinity and proposed components. Existing and proposed project facilities would not be located on or near Caltrans facilities and would not interfere with day-to-day Caltrans operations. The project does not include an access point immediately adjacent to the freeway. The access point would likely be located adjacent to the proposed Well Site, near the intersection of Guthrie Avenue and Chariton Street.

CHAPTER 4

Corrections and Additions to the Draft IS/MND

Section 4.1 Introduction

This chapter contains a compilation of revisions made to the text of the Draft IS/MND by the City as the Lead Agency, in response to the comments received during the 30-day public review period as well as minor edits. All revisions are previously introduced in Chapter 3 of this Final IS/MND but are summarized here for convenience of the reader. Where the responses indicate additions or deletions to the text of the Draft IS/MND, additions are indicated in underline and deletions in ~~strikeout~~.

Page 12

Project construction would take place for approximately 13 months, from ~~Fall 2019 through Winter 2020~~, through Summer 2021, 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~~9:00 p.m., Monday through Friday except on federal holidays.

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- 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 and subway 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. While, Metro's Purple Line (subway) is located within the project area near the proposed transmission main. It should be noted that Metro is currently working on the Purple Line within the City of Los Angeles.

The proposed transmission main rehabilitation and new construction areas were specifically designed to avoid impacts to the Metro Purple Line construction work and future operations. The areas in which the proposed transmission main would be implemented along North Le Doux Road, specifically, would utilize slip-lining techniques which would minimize disturbance to areas near Metro facilities. Slip-lining construction involves installing a new pipe within an existing host pipe using trenchless construction methods to cross Wilshire Boulevard. Slip-lining eliminates the need for active construction areas which would require partial lane/road closures, which could impact traffic.

Further, the City of Beverly Hills and their contractor will coordinate with Metro during the construction design and planning, including the development of a Traffic Control Plan (see Mitigation Measure TR-1, below). This will ensure that Metro's Purple Line work is not adversely impacted and that Metro's work will not interfere with the proposed transmission main, once implemented. As such, the project would not significantly impact Purple Line construction haul routes or construction activities.

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).

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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, Los Angeles County, Metro, and Caltrans, 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.

CHAPTER 5

Mitigation Monitoring and Reporting Program

5.1 CEQA Requirements

Section 15091(d) and Section 15097 of the CEQA Guidelines require a public agency to adopt a program for monitoring or reporting on the changes it has required in the project or conditions of approval to substantially lessen significant environmental effects. This Mitigation, Monitoring and Reporting Program (MMRP) summarizes the mitigation commitments identified in the La Brea Subarea Well and Transmission Main Project (proposed project) (State Clearinghouse No. 2019099076). Mitigation measures are presented in the same order as they occur in the Final IS/MND.

The columns in the MMRP table provide the following information:

- **Mitigation Measure(s):** The action(s) that will be taken to reduce the impact to a less-than-significant level.
- **Implementation, Monitoring, and Reporting Action:** The appropriate steps to implement and document compliance with the mitigation measures.
- **Responsibility:** The agency or private entity responsible for ensuring implementation of the mitigation measure. However, until the mitigation measures are completed, the City, as the CEQA Lead Agency, remains responsible for ensuring that implementation of the mitigation measures occur in accordance with the MMRP (CEQA Guidelines, Section 15097(a)).
- **Monitoring Schedule:** The general schedule for conducting each task, either prior to construction, during construction and/or after construction.

TABLE 5-1
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE LA BREA SUBAREA WELL AND TRANSMISSION MAIN PROJECT

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
Biological Resources 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.	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain copies of the survey(s) in the project file. • Prepare reports to document any nesting bird species prior to construction activities. • Perform additional survey(s) if there is a lapse of construction activities for seven days or more. • Prepare reports to document any nesting bird species prior to resuming construction activities. • Retain surveys and reports in the project file. 	The City; Construction Contractor	Before and During Construction

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
Cultural Resources			
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.	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain documentation of retaining a qualified archaeologist in the project file. 	The City; Construction Contractor	Before and During Construction
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.	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain documentation demonstrating attendance of construction personnel to cultural resources sensitivity training. 	The City; Construction Contractor	Before and During Construction
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 SOGIC.	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Perform site inspections to ensure compliance with cultural sensitivity requirements. • Retain all archeological and tribal inspection forms in the project file. • Retain copy of final archaeological report in the project file. 	The City; Construction Contractor	Before and During Construction

5. Mitigation Monitoring and Reporting Program

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
<p>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.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Perform site inspections to ensure compliance with cultural sensitivity requirements. • Retain inspection forms in the project file. • Retain correspondence between archeologist and Native American representative. • Retain a copy of Archeological Resources Treatment Plan (if one is required) in the project file. 	The City; Construction Contractor	Before and During Construction
<p>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.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain inspection forms in the project file. • Retain NAHC correspondence in project files, if necessary. 	The City; Construction Contractor	Before and During Construction
<p>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.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain documentation of retaining a qualified paleontologist in the project file. 	The City; Construction Contractor	Before and During Construction
<p>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.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain documentation demonstrating attendance of construction personnel to paleontological resources training. 	The City; Construction Contractor	Before and During Construction

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
<p>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.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain copies of all paleontological research, survey and PRMP in the project file. • Perform site monitoring to ensure compliance with paleontological requirements. • Retain inspection forms in the project file. 	The City; Construction Contractor	Before and During Construction
<p>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.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Paleontological monitoring reports and logs will be retained in project file. • Retain fossil recovery logs in the project file. 	The City; Construction Contractor	Before and During Construction
Hazards and Hazardous Materials			
<p>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.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain copies of all environmental site assessments in the project file. 	The City; Construction Contractor	Before Construction

5. Mitigation Monitoring and Reporting Program

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
<p>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.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain copies of Soil and Groundwater Management Plan in the project file. • Perform site inspections to verify contractor compliance with hazardous materials. • Retain inspection forms in the project file. 	The City; Construction Contractor	Before and During Construction
<p>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.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain a qualified consultant to prepare a Traffic Control Plan that is consistent with the Los Angeles County Operational Area Emergency Response Plan. • Retain copies of written notifications in the project file. • Retain copies of the Traffic Control Plan in the project file. 	The City; Construction Contractor	Before Construction
Noise			
<p>NOISE-1: Prior to construction, the City of Beverly Hills shall ensure that the contractor specifications stipulate that:</p> <ul style="list-style-type: none"> • 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. <p>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.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain a qualified construction monitor to conduct routine inspections of noise reduction measures during project construction. • Maintain written inspection records in the project file to verify compliance. 	The City; Construction Contractor	Before Construction
<p>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.</p> <ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain a qualified Noise Disturbance Coordinator to implement the mitigation measure. • Maintain written documentation of all noise complaints and the resolution of complaints in the project file. 	The City; Construction Contractor	During and After Construction

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
<ul style="list-style-type: none"> 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. <p>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.</p>			
<p>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, Leq 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).</p>	<ul style="list-style-type: none"> Include mitigation measure in construction contractor specifications. Maintain written documentation of offered noise mitigation measures in the project file. 	The City; Construction Contractor	During Construction
<p>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.</p>	<ul style="list-style-type: none"> Include mitigation measure in construction contractor specifications. Maintain written documentation of all construction coordination in the project file. 	The City; Construction Contractor	Before and During Construction
<p>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.</p>	<ul style="list-style-type: none"> Include mitigation measure in construction contractor specifications. Retain a qualified construction monitor to conduct routine inspections of vibration reduction measures during project construction. Retain documentation required by the mitigation measure. Maintain written inspection records in the project file to verify compliance. 	The City; Construction Contractor	During Construction

5. Mitigation Monitoring and Reporting Program

Mitigation Measures	Implementation, Monitoring, and Reporting Action	Responsibility	Monitoring Schedule
Transportation			
<p>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.</p> <p>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, Los Angeles County, Metro, and Caltrans, 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.</p>	<ul style="list-style-type: none"> • Include mitigation measure in construction contractor specifications. • Retain copies of all correspondence with the City of Los Angeles and the City of Beverly Hills in the project file. • Retain copies of the Traffic Control/Traffic Management Plan in the project file. • Retain a qualified construction monitor to conduct routine inspections of traffic control measures during project construction. • Maintain a record of collected information and written notifications in the project file. • Maintain written inspection records in the project file to verify compliance. 	The City; Construction Contractor	Before and During Construction

DRAFT IS/MND

(Attached)

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



Public Draft

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

Initial Study/Mitigated Negative Declaration

Prepared for
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September 2019

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Appendix B: Biological Resources Data

Appendix C: Cultural Resources and Paleontological Resources Technical Reports,
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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 Hill's 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.

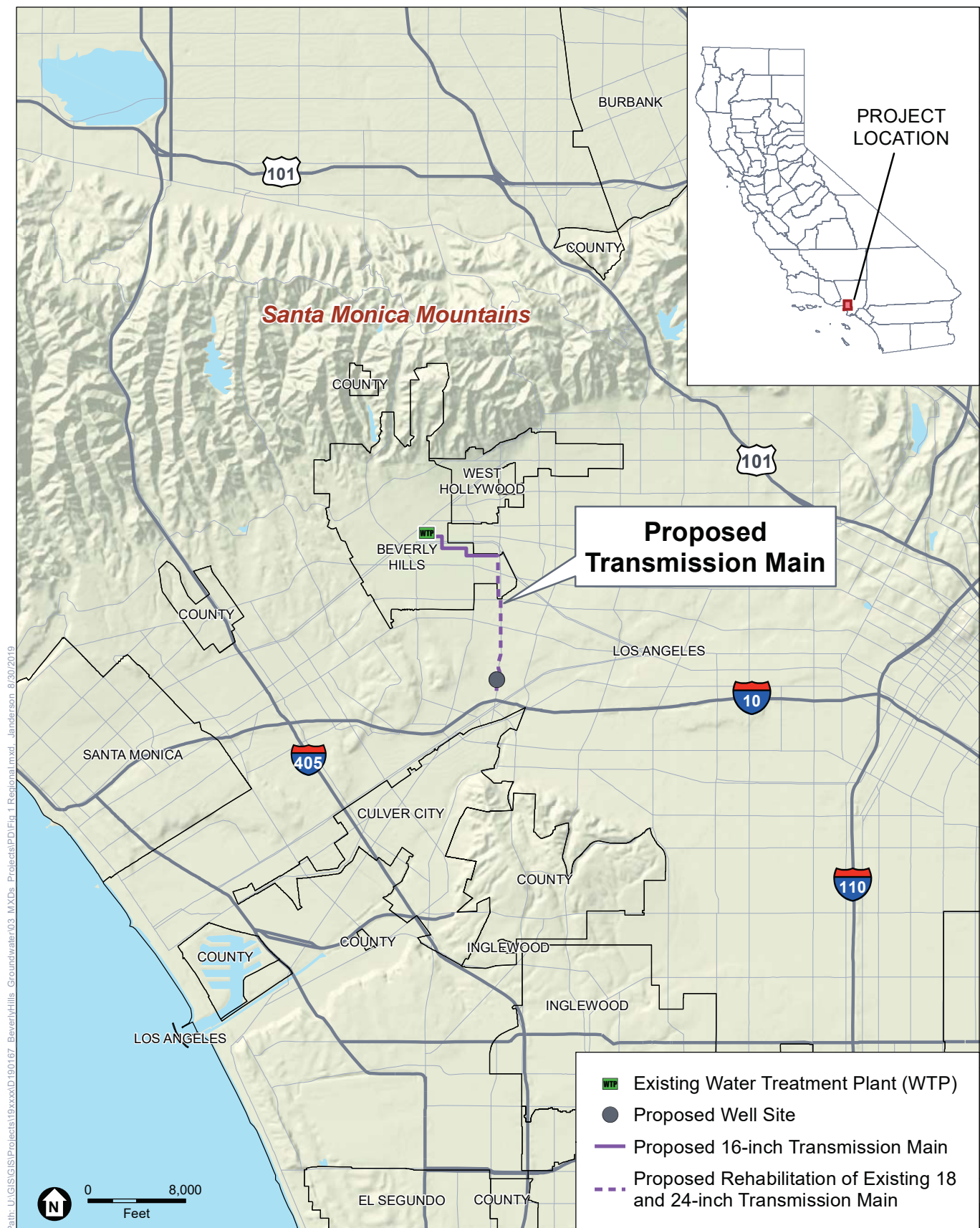
The proposed transmission main, in its entirety would be approximately four miles long. The proposed rehabilitation area of the transmission main (existing 18 and 24-inch inactive pipelines) would proceed north within La Cienega Boulevard to Olympic Boulevard and within Le Doux Road from Gregory Way 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

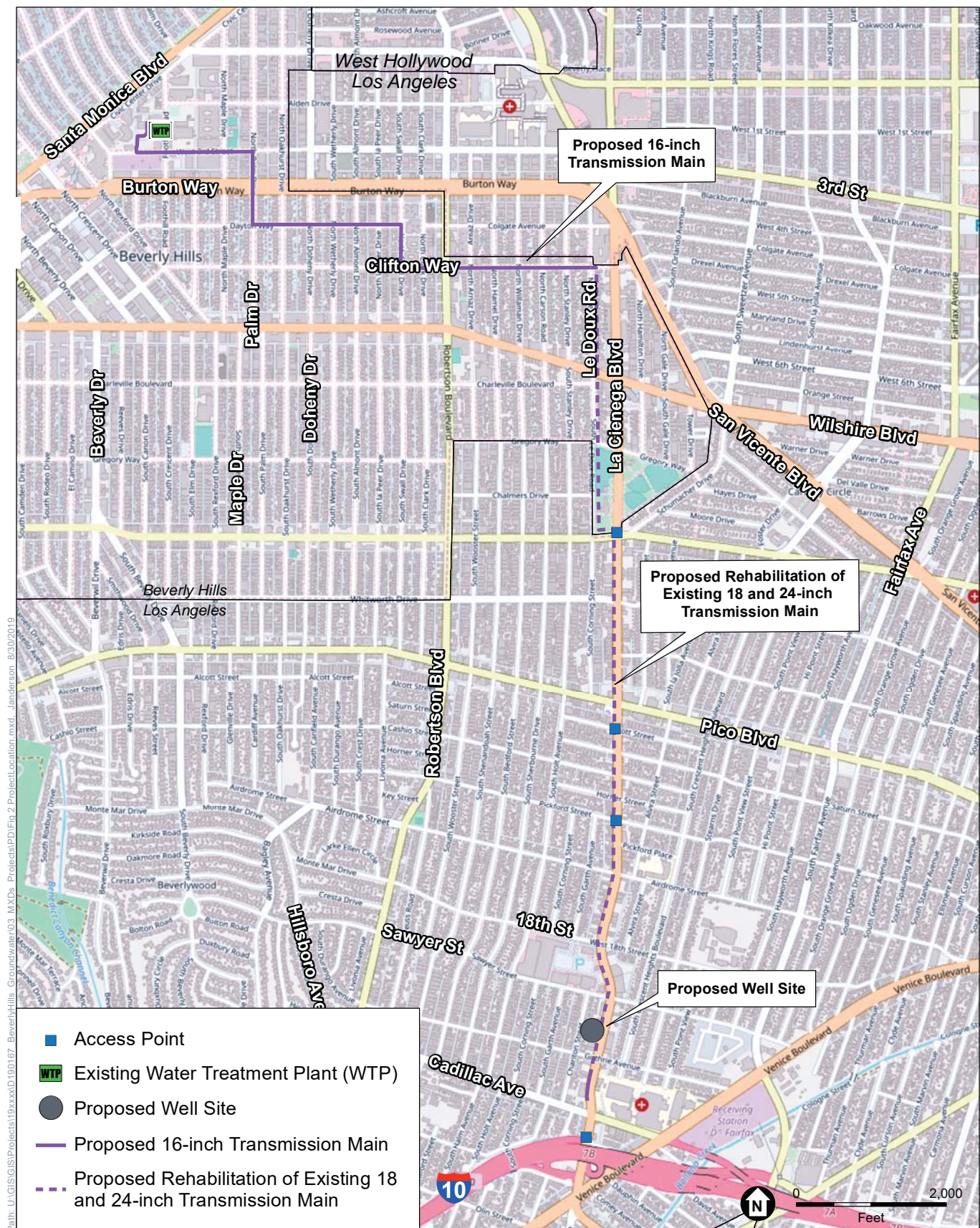
The proposed project includes: the demolition of existing structures at the proposed Well Site; the construction of one well within the La Brea Subarea; the rehabilitation of existing inactive 18 and 24-inch transmission main pipelines along La Cienega Boulevard; and the construction of a new 16-inch 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

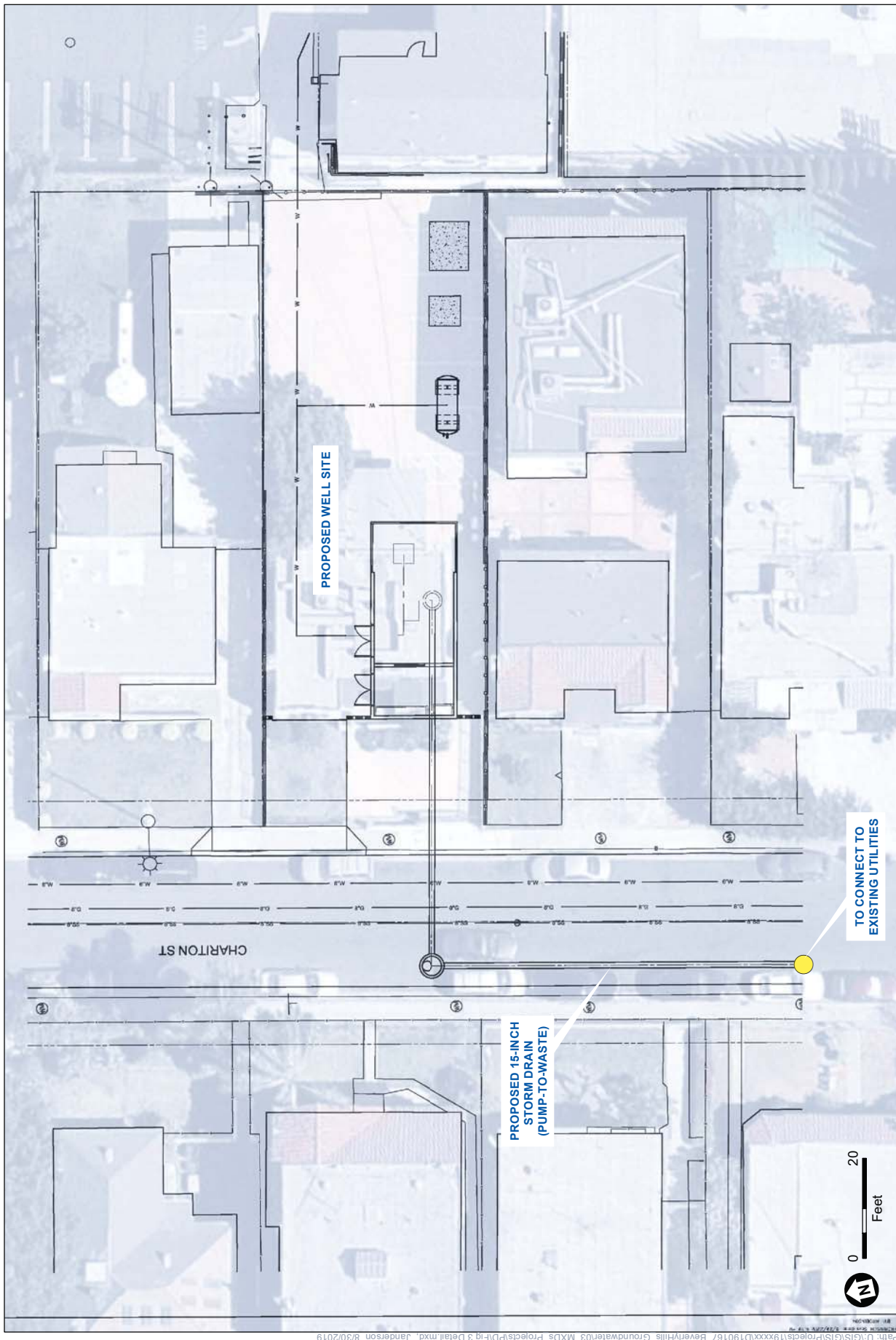
Figure 1
Regional Location



SOURCE: ESRI; City of Beverly Hills

La Brea Subarea Well and Transmission Main Project

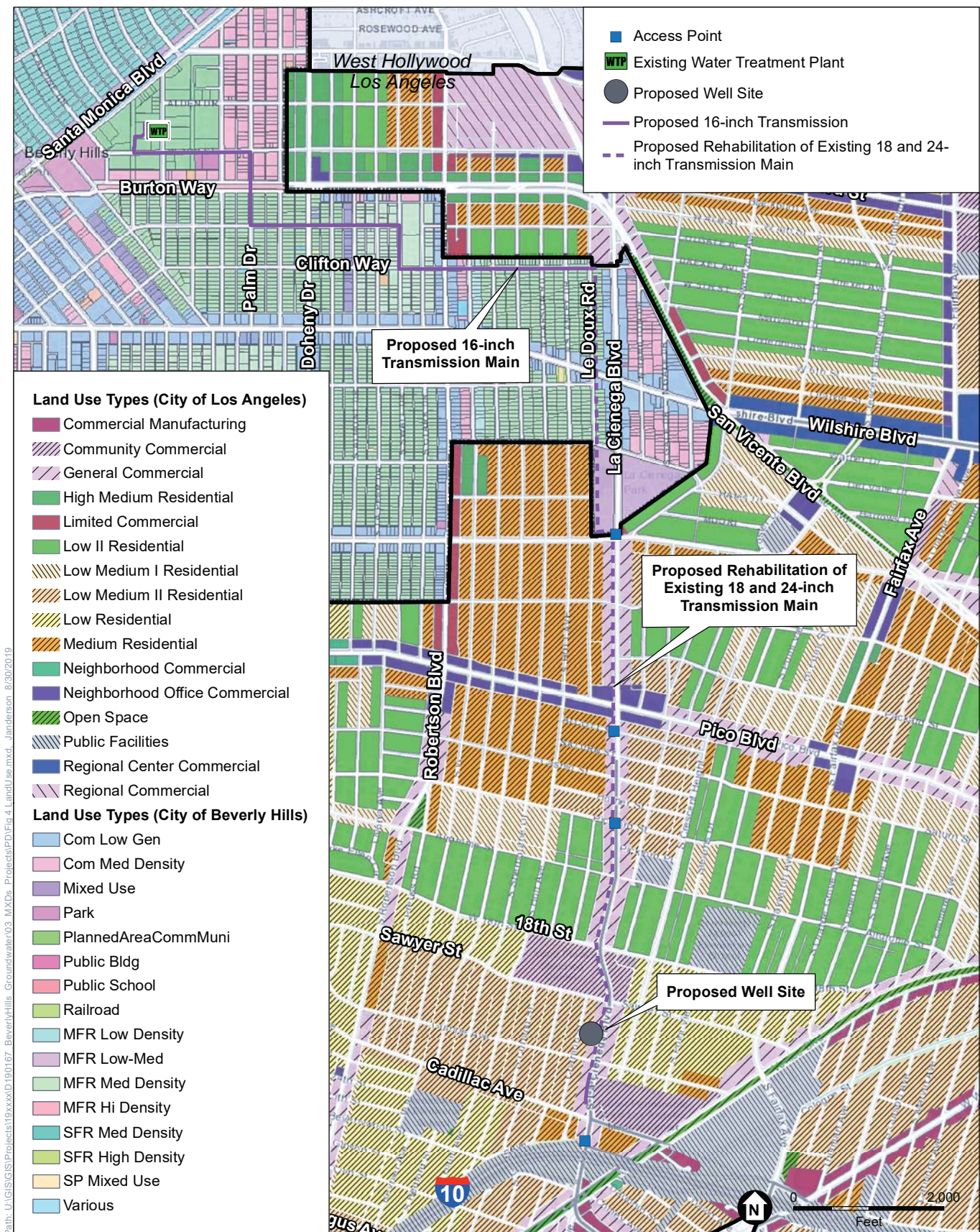
Figure 2
Project Location



La Brea Subarea Well and Transmission Main Project

SOURCE: Mapbox; City of Beverly Hills

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

.....
 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.

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 PM_{2.5}, 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

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- 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 (CNDDDB) Rarefind 5. Electronic database, Sacramento, California. Available online at: <https://www.wildlife.ca.gov/Data/CNDDDB/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.

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.

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.

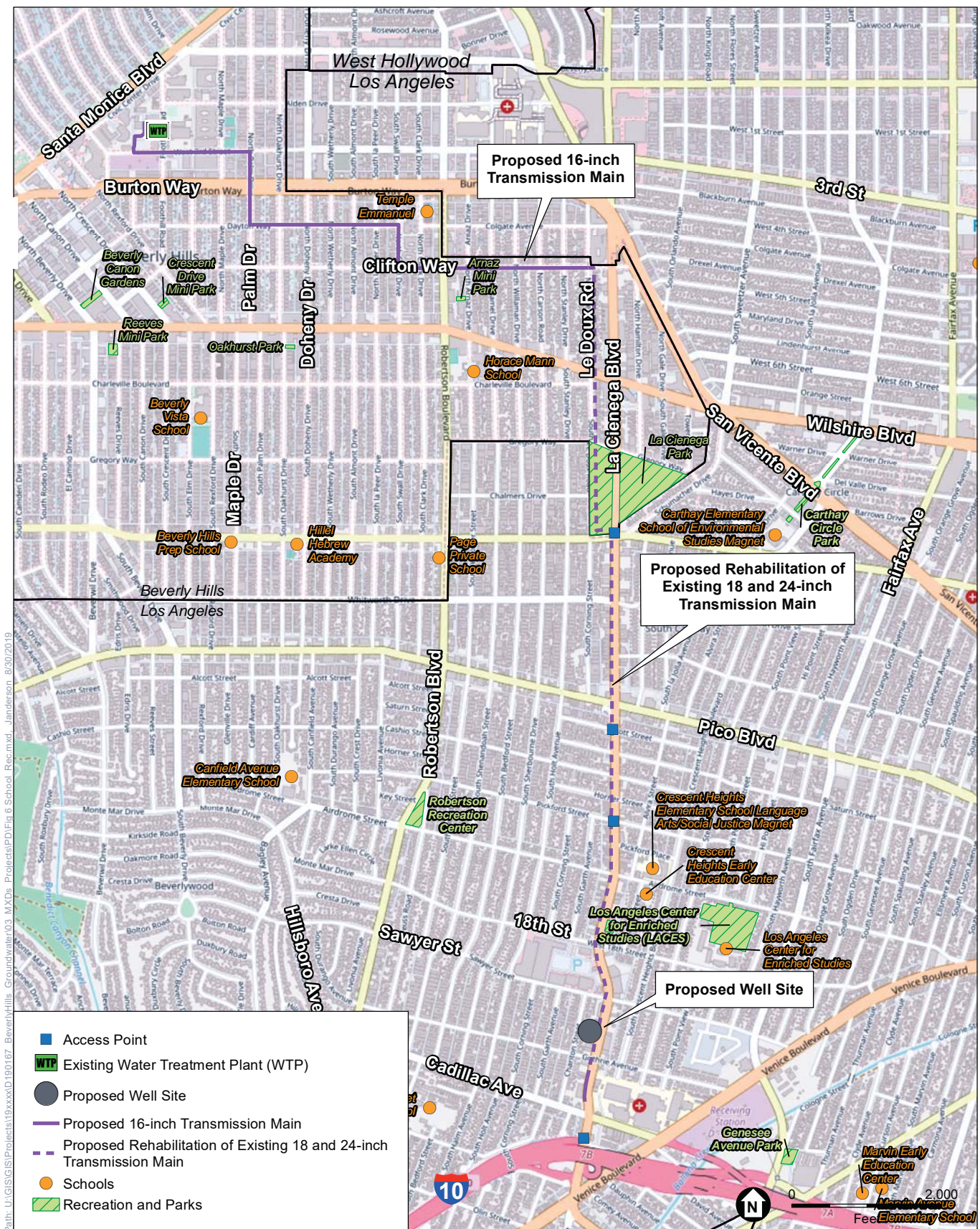
In the event of an accidental release during implementation of the proposed project, containment and clean up would be in accordance with existing applicable regulatory requirements. Title 8 CCR 5194 requires preparation of a hazards communication program identifying hazardous materials onsite and reducing 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

California Department of Forestry and Fire Protection (CAL FIRE), 2011. Very High Fire Hazard Severity Zones in LRA, Los Angeles County. Available online at: http://frap.fire.ca.gov/webdata/maps/los_angeles/LosAngelesCounty.pdf, accessed June 2019.

Department of Toxic Substance Control (DTSC), 2019a. Available online at: <https://calepa.ca.gov/sitecleanup/corteselist/>, accessed June 2019.

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.

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 impervious 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.

References

- City of Beverly Hills, 2016. Urban Water Management Plan. Available online at <http://www.beverlyhills.org/departments/publicworks/utilities/waterservices/urbanwatermanagementplan/>, accessed June 2019.
- Federal Emergency Management Agency (FEMA), 2018. FEMA flood Map Service Center. Available online at: <https://msc.fema.gov/portal/home>, accessed June 2019.
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- Los Angeles Department of Water and Power, 2011. *Feasibility Report for Development Resources in the Santa Monica and Hollywood Basins*. December 2011.
- Michael Baker International, 2017. *La Brea Subarea, Wells, Water Treatment, and Transmission Main Project Preliminary Design Report*. May 2017.
- USGS, 2019a. Seismic Seiches. Available at: <https://earthquake.usgs.gov/learn/topics/seiche.php>, accessed June 2019.
- USGS, 2019b. Earthquake Glossary, Tsunami. Available at: <https://earthquake.usgs.gov/learn/glossary/?term=tsunami>, accessed June 2019.
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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.

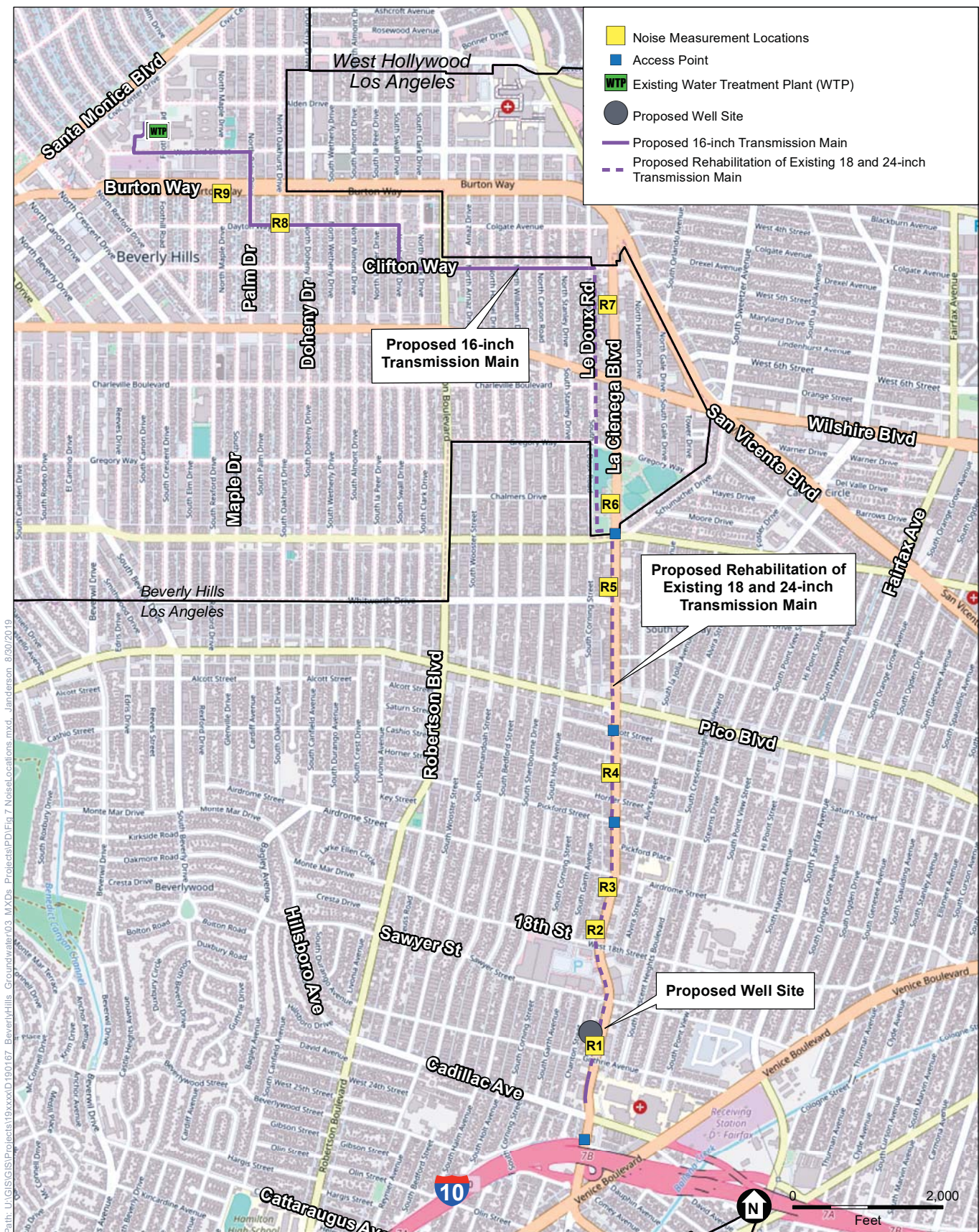
TABLE 6
AMBIENT NOISE LEVELS

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

City of Beverly Hills, 2019a. Fire Department. Available online at:

<http://www.beverlyhills.org/departments/firedepartment/>, accessed June 2019.

City of Beverly Hills, 2019b. Police Department. Available online at:

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<http://www.lapdonline.org/>, accessed June 2019.

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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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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.

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.

Notice of Determination

Appendix D

TO:

☒ Office of Planning and Research

For U.S. Mail:

P.O. Box 3044

Sacramento, CA 95812-3044

Street Address:

1400 Tenth Street

Sacramento, CA 95814

☒ County Clerk

County of: Los Angeles

Address: 12400 Imperial Hwy

Norwalk, CA 90650

FROM:

Public Agency: City of Beverly Hills

Public Works Department, Engineering Division

Address: 345 Foothill Road

Beverly Hills, CA 90210

Contact: Tristan Malabanan

Phone: 310-285-2467

Lead Agency (if different from above):

Same as Above

Address:

Contact:

Phone:

Subject: Filing of Notice of Determination in compliance with Section 21108 or 21152 of the Public Resources Code.

State Clearinghouse Number (if submitted to State Clearinghouse): 2019099076

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

Project Location (include county): Cities of Los Angeles and Beverly Hills, Los Angeles County

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

This is to advise that the City of Beverly Hills has approved the above described project on November 19, 2019 and has made the following determinations regarding the above described projects.

(☒ Lead Agency or ☐ Responsible Agency)

November 19, 2019 and has made the following determinations regarding the above described projects.
(Date)

1. The project [☐ will ☒ will not] have a significant effect on the environment.
2. ☐ An Environmental Impact Report was prepared for this project pursuant to the provisions of CEQA.
☒ A Negative Declaration was prepared for this project pursuant to the provisions of CEQA.
3. Mitigation measures [☒ were ☐ were not] made a condition of the approval of the project.
4. A mitigation reporting or monitoring plan [☒ was ☐ was not] adopted for this project.
5. A statement of Overriding Considerations [☐ was ☒ was not] adopted for this project.
6. Findings [☐ were ☒ were not] made pursuant to the provisions of CEQA.

This is to certify that the final EIR with comments and responses and record of project approval, or the Negative Declaration, is available to the General Public at:

City of Beverly Hills Public Works Building, 345 Foothill Road, Beverly Hills, CA 90210

Signature (Public Agency)



Title: Project Manager

Date: November 20, 2019

Date Received filing at OPR:

Governor's Office of Planning & Research

NOV 25 2019

ORIGINAL FILED

NOV 22 2019

Notice of Determination

LOS ANGELES COUNTY CLERK

Appendix D

TO:

☒ Office of Planning and Research
 For U.S. Mail: Street Address:
 P.O. Box 3044 1400 Tenth Street
 Sacramento, CA 95812-3044 Sacramento, CA 95814

☒ County Clerk
 County of: Los Angeles
 Address: 12400 Imperial Hwy
 Norwalk, CA 90650

FROM:

Public Agency: City of Beverly Hills
 Public Works Department, Engineering Division
 Address: 345 Foothill Road
 Beverly Hills, CA 90210
 Contact: Tristan Malabanan
 Phone: 310-285-2467
 Lead Agency (if different from above):
 Same as Above
 Address:
 Contact:
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6. Findings ☐ were ☒ were not made pursuant to the provisions of CEQA.

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City of Beverly Hills Public Works Building, 345 Foothill Road, Beverly Hills, CA 90210

Signature (Public Agency)  Title: Project Manager

Date: November 20, 2019

Date Received filing at OPR:

Governor's Office of Planning & Research

NOV 25 2019

State of California—Natural Resources Agency
 CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
 2019 ENVIRONMENTAL FILING FEE CASH RECEIPT

RECEIPT #
201911220480013
STATE CLEARING HOUSE # (if applicable)
2019099076

SEE INSTRUCTIONS ON REVERSE. TYPE OR PRINT CLEARLY

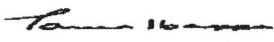
LEAD AGENCY			DATE
CITY OF BEVERLY HILLS			11/22/2019
COUNTY/STATE AGENCY OF FILING			DOCUMENT NUMBER
LOS ANGELES			2019306193
PROJECT TITLE			
CITY OF BEVERLY HILLS, LA BREA SUBAREA WELL AND TRANSMISSION MAIN PROJECT			
PROJECT APPLICANT NAME			PHONE NUMBER
TRISTAN MALABANAN			
PROJECT APPLICANT ADDRESS	CITY	STATE	ZIP CODE
345 FOOTHILL ROAD	BEVERLY HILLS	CA	90210
PROJECT APPLICANT (Check appropriate box):			
<input checked="" type="checkbox"/> Local Public Agency <input type="checkbox"/> School District <input type="checkbox"/> Other Special District <input type="checkbox"/> State Agency <input type="checkbox"/> Private Entity			

CHECK APPLICABLE FEES:

<input type="checkbox"/> Environmental Impact Report (EIR)	\$3,271.00	\$	0.00
<input checked="" type="checkbox"/> Negative Declaration (ND)(MND)	\$2,354.75	\$	2,354.75
<input type="checkbox"/> Application Fee Water Diversion (State Water Resources Control Board Only)	\$850.00	\$	0.00
<input type="checkbox"/> Projects Subject to Certified Regulatory Programs (CRP)	\$1,112.00	\$	0.00
<input checked="" type="checkbox"/> County Administrative Fee	\$50.00	\$	75.00
<input type="checkbox"/> Project that is exempt from fees			
<input type="checkbox"/> Notice of Exemption			
<input type="checkbox"/> CDFW No Effect Determination (Form Attached)			
<input type="checkbox"/> Other _____		\$	0.00

PAYMENT METHOD:

<input type="checkbox"/> Cash	<input checked="" type="checkbox"/> Credit	<input checked="" type="checkbox"/> Check	<input type="checkbox"/> Other _____	\$	2,429.75
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SIGNATURE	TITLE
X 	ITC

Governor's Office of Planning & Research

NOV 25 2019

STATE CLEARINGHOUSE

ORIGINAL FILED

NOV 22 2019

Notice of Determination

LOS ANGELES COUNTY CLERK

Appendix D

TO:

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Sacramento, CA 95812-3044

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☒ Lead Agency or ☐ Responsible Agency)


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5. A statement of Overriding Considerations ☐ was ☒ was not adopted for this project.
6. Findings ☐ were ☒ were not made pursuant to the provisions of CEQA.

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City of Beverly Hills Public Works Building, 345 Foothill Road, Beverly Hills, CA 90210

Signature (Public Agency)



Title: Project Manager

Date: November 20, 2019

Date Received filing at OPR:

10/12/2021 Board Meeting
State of California—Natural Resources Agency
CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
2019 ENVIRONMENTAL FILING FEE CASH RECEIPT

7-8

Attachment 2, Page 717 of 722

986

RECEIPT #
201911220480013
STATE CLEARING HOUSE # (If applicable)
2019099076

SEE INSTRUCTIONS ON REVERSE. TYPE OR PRINT CLEARLY

LEAD AGENCY			DATE
CITY OF BEVERLY HILLS			11/22/2019
COUNTY/STATE AGENCY OF FILING			DOCUMENT NUMBER
LOS ANGELES			2019306193
PROJECT TITLE			
CITY OF BEVERLY HILLS, LA BREA SUBAREA WELL AND TRANSMISSION MAIN PROJECT			
PROJECT APPLICANT NAME			PHONE NUMBER
TRISTAN MALABANAN			
PROJECT APPLICANT ADDRESS	CITY	STATE	ZIP CODE
345 FOOTHILL ROAD	BEVERLY HILLS	CA	90210
PROJECT APPLICANT (Check appropriate box):			
<input checked="" type="checkbox"/> Local Public Agency <input type="checkbox"/> School District <input type="checkbox"/> Other Special District <input type="checkbox"/> State Agency <input type="checkbox"/> Private Entity			

CHECK APPLICABLE FEES:

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<input checked="" type="checkbox"/> County Administrative Fee	\$50.00	\$	75.00
<input type="checkbox"/> Project that is exempt from fees			
<input type="checkbox"/> Notice of Exemption			
<input type="checkbox"/> CDFW No Effect Determination (Form Attached)			
<input type="checkbox"/> Other _____		\$	0.00

PAYMENT METHOD:

<input type="checkbox"/> Cash <input checked="" type="checkbox"/> Credit <input checked="" type="checkbox"/> Check <input type="checkbox"/> Other _____	\$	2,429.75
---	----	----------

SIGNATURE	TITLE
X 	ITC

Attachment 2, Page 719 of 722
Dean C. Logan
Los Angeles County Registrar / Recorder
12400 Imperial Highway, Norwalk, CA
(800)201-8999

BUSINESS FILINGS REGISTRATION

NORWALK DEPARTMENT HEADQUARTER

Cashier: T. IBARRA



* 2 0 1 9 1 1 2 2 0 4 8 0 0 1 3 *

Friday, November 22, 2019 10:55 AM

Item(s)

Fee	Qty	Total
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NoD - County Posting Fee	1	\$75.00
2019306193		

NoD - Negative Declaratio	1	\$2,354.75
2019306193		

Total		\$2,429.75
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Total Documents:	1
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Customer payment(s):

Check	\$2,354.75
Credit Card	\$75.00

Check List:

#129920679	\$2,354.75
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**ADDENDUM TO THE INITIAL STUDY/MITIGATED NEGATIVE DECLARATION FOR THE CITY
OF BEVERLY HILLS, LA BREA SUBAREA WELL AND TRANSMISSION MAIN PROJECT**

**Prepared by:
City of Beverly Hills
345 Foothill Road
Beverly Hills, CA 90210**

1. Introduction:

To expand local water supply, the City of Beverly Hills developed the La Brea Subarea Well and Transmission Main Project (project) to provide an additional net 1,700 acre-feet per year of groundwater supply in the La Brea Subarea within the unadjudicated portion of the Central Groundwater Basin. The project includes the construction of a groundwater production well in the La Brea Subarea, the rehabilitation and construction of a transmission pipeline, and the connection of the transmission pipeline to a newly constructed raw water transmission main. The transmission main connects the production well to the existing Foothill Water Treatment Plant for treatment and supply. The pipelines are sized to accommodate a maximum of approximately 3,000 gallons per minute, which would be from the production well and, potentially, other wells in the area although the locations of any such future wells is unknown.

The City of Beverly Hills published the Notice of Intent to Adopt an Initial Study/Mitigated Negative Declaration (IS/MND) for the project in September of 2019 for a 30-day public review period. After the 30-day public review period, a Final IS/MND was prepared and published. In November of 2019, the City of Beverly Hills certified the project and filed a Notice of Determination with the Los Angeles County Clerk and State Clearinghouse.

2. Project Modification Description:

The City of Beverly Hills is proposing to obtain financial assistance for the approved project through the Local Resources Program (LRP) that is administered by the Metropolitan Water District of Southern California (Metropolitan). The LRP provides financial incentives to public and private water agencies to encourage local development of water recycling, groundwater recovery and seawater desalination.

The City of Beverly Hills is requesting Metropolitan to reinstate the LRP agreement executed in 1998 and terminated in July 2020. Due to unforeseen water quality changes discovered in 2015, the City's water treatment plant had to be shut down for an extended period of time. As a result of increased levels of iron, manganese, iron sulfide, and sanding in the groundwater, the City of Beverly Hills embarked on a program to perform water quality testing, pilot testing, design, and construction of a pre-treatment system addition to the existing WTP. The pre-treatment system comprises of the addition of enhanced sand removal with sand separators and Oxidant Media Filtration prior to the existing reverse osmosis treatment system. Construction of the pretreatment system began in August 2020 and is scheduled to be completed in September 2021.

The City of Beverly Hills is requesting the LRP agreement to be extended and reinstated with an amendment to the original agreement adding an additional 5 years to the term of the agreement. The LRP incentive of \$250/AF would remain the same in the reinstated agreement as in the original agreement.

As the Lead Agency, the City of Beverly Hills has prepared this addendum to the previously certified IS/MND to clarify the City's intent to reinstate and extend LRP funding from Metropolitan in support of the project. Metropolitan will act as a Responsible Agency to this project for CEQA compliance.

3. Minor Technical Additions:

This addendum has been prepared to clarify the Lead Agency's intent to apply for LRP funding.

In April 2020, the City of Beverly Hills submitted the proposal on the City of Beverly Hills, La Brea Subarea Well and Transmission Main Project to Metropolitan. As a Responsible Agency, Metropolitan's Board of Directors will review and consider the proposal and environmental documentation prepared by the City of Beverly Hills including this addendum in determining whether or not to approve financial assistance for the project within the LRP administrative process.

The proposed project modification (i.e., a partnership with Metropolitan in the LRP for the City of Beverly Hills, La Brea Subarea Well and Transmission Main Project) would be consistent with Metropolitan's commitment to develop LRP activities that would increase water supply reliability and avoid or defer Metropolitan capital expenditures.

Therefore, this minor clarification results in no modifications to the environmental impact analysis or conclusions included in the adopted IS/MND. Instead, the proposed project modification is an administrative and fiscal action.

4. Basis for Preparation of Addendum:

Section 15164(b) of the State CEQA Guidelines states "An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred."

The proposed modification to the original project would not result in a tangible change in the physical environment. As the Lead Agency for the proposed project modification, the City of Beverly Hills is issuing this addendum in accordance with the State CEQA Guidelines (Section 15164). The minor textual additions provided herein are not considered to 1) constitute a substantial change in the project as originally proposed by the City of Beverly Hills, 2) lead to substantial changes in the circumstances under which the project is undertaken, or 3) constitute new information of substantial importance. Accordingly, an addendum was prepared as opposed to a negative declaration or a subsequent environmental impact report.

Shana E Epstein

Signature

March 4, 2021 | 16:42 PST

Date

Printed Name: Shana Epstein

Title: Director of Public Works



Adopt framework for amending Local Resources Program Agreements; and Authorize the General Manager to Reinstate and Amend the Existing Local Resource Program Agreement for the Beverly Hills Desalter Project

Water Planning and Stewardship Committee

Item 7-8

October 11, 2021

Local Resource Program

- Provides incentives to help member agencies develop new local projects
- Helps to improve regional reliability
- Continuously refined to support development of new local projects
 - 2014 – New incentive structure
 - 2018 – Established interim LRP target yield
 - 2021 – Approved framework for extensions to project start of operation performance provision



Recycled
Water
(1982)



Groundwater
Recovery
(1991)



Seawater
Desalination
(2014)

Need for Additional Framework

- Staff recognizes that projects face additional challenges
- Current LRP provisions do not provide extensions to contract term for projects facing unforeseen production issues
 - Resulting in project shut down or;
 - Significant loss of production and incentives
- The proposed framework provides flexibility and additional time to resolve operational challenges











Proposed Framework for Amending LRP Agreements

- Proposed framework supports projects facing unforeseen production issues that are beyond an agency's control
 - Excludes projects performing poorly
- Amending LRP agreements would provide member agencies:
 - One time pause to contract term;
 - Extension of up to three years (to get project back online)

Unforeseen Production Issues

- Defined for active projects already approved by the board:
 - Acts of God affecting production
 - Earthquakes, flood, lightening strike, etc.
 - Unforeseen changes in water quality that result in project failure
 - Plant shutdown due to water quality constituents not originally detected
 - Facility failure
 - Well collapse, membrane deficiency, etc.
 - Source water issues
 - Unavailability

Approval of LRP Extension Requests

Formal Extension Request by Project Sponsors	Continuing Pursuance of Project by Parties	Project Schedule	(Re)Start of Operation
<ul style="list-style-type: none">• Include project-specific circumstances• Describe actions being taken to correct the issue 	<ul style="list-style-type: none">• Affirm that all parties to the agreement are still pursuing the project  	<ul style="list-style-type: none">• Provide a revised schedule   	<ul style="list-style-type: none">• Affirm that project will start operation within requested extension• Contract extension may not exceed three fiscal years    

- Upon Board approval, the agreement would terminate up to three years after the original termination date
- No changes in remaining contract terms
 - All performance provisions would remain in place
 - No increase to maximum financial obligations originally approved by the Board

Beverly Hills Desalter Project

- Groundwater Recovery Program (GRP) Agreement executed in 1998 (2,600 AFY)
- Project commenced operation April 2003
- Agreement term – 2003 to 2023
- Plant shut down in 2015 due to unforeseen changes in water quality of the Hollywood Basin (beyond agency's control)
- Beverly Hills took significant action to bring project back on-line
- Agreement automatically terminated in July 2020 for 5 consecutive years of nonpayment from Metropolitan

Requested Reinstatement & Amendment

- Reinstatement and amend the terminated Beverly Hills Desalter GRP agreement
- Extend termination date from April 30, 2023, to June 30, 2026
- No changes to remaining contractual terms:
 - Contractual capacity remains at 2,600 AFY
 - Sliding scale incentive remains at \$250/AF
- No increase to maximum financial obligations originally approved by the Board in 1998

Summary

- Proposed framework provides projects more flexibility in facing unforeseen production issues:
 - Issues arise after start of operation
 - Agency requests pause and extension to term of agreement
- Considerations consistent with framework approved by the Board in June
- Reinstating and amending the Beverly Hills Desalter Project agreement, Metropolitan would support restarting the project
 - Significant component of agency's water supply portfolio
 - Within Metropolitan's maximum commitment

Board Options

Option #1:

- Review and consider the City of Beverly Hill's approved Final Mitigated Negative Declarations and Addendum and take related CEQA actions; and
- Authorize the General Manager to reinstate and amend the existing Groundwater Recovery Program Joint Participation Agreement for Recovery and Utilization of Degraded Groundwater for the Beverly Hills Desalter Project with the City of Beverly Hills for up to 2,600 AFY of advanced treated brackish groundwater under the terms included in this letter; and
- Approve the proposed framework and one time pause and extension of agreement terms.

Option #2:

- Do not authorize the reinstatement or amendment to the original agreement for the Project.

Staff Recommendation

Option #1





Shana Epstein
Director of Public Works

October 7, 2021

Re: Support for Consideration of Reinstatement and Amendment of the Existing LRP

Dear Water Planning and Stewardship Committee:

The City would like to express its appreciation and support to Metropolitan Water District for consideration to authorize the General Manager to reinstate and amend the existing Local Resources Program (LRP) agreement for the City of Beverly Hills Desalter Project.

Due to unforeseen water quality changes discovered in 2015, the City's water treatment plant had to be shut down for an extended period of time. As a result of increased levels of iron, manganese, iron sulfide, and sanding in the groundwater, the City of Beverly Hills embarked on a program to perform water quality testing, pilot testing, design, and construction of a pre-treatment system addition to the existing WTP. The pre-treatment system comprises of the addition of enhanced sand removal with sand separators and Oxidant Media Filtration prior to the existing reverse osmosis treatment system. Construction of the pretreatment system began in August 2020 and is currently under construction. The City also dedicated additional resources in the pursuit of augmenting local water supply from additional water basins.

The City of Beverly Hills is requesting the LRP agreement to be extended and reinstated with an amendment to the original agreement adding an additional 3 years to the term of the agreement.

Sincerely,

Shana E Epstein

Shana E. Epstein
Director of Public Works



- Board of Directors
Real Property and Asset Management Committee

10/12/2021 Board Meeting

7-9

Subject

Adopt a Resolution declaring certain Metropolitan-owned real property in the Palo Verde Valley in the counties of Imperial and Riverside as exempt surplus land pursuant to California Government Code Section 54221; the General Manager has determined the proposed action is exempt or otherwise not subject to CEQA

Executive Summary

Recent updates to the California Surplus Land Act (Government Code 54220, et seq.) and provisions of the Metropolitan Administrative Code (collectively, “Surplus Land Regulations”) require a Board declaration in the form of a resolution that land is “exempt surplus land” that is dedicated to listed agency purposes before Metropolitan may lease such land to others. The use of a resolution mainly changes only the form of documentation of the agency purposes being furthered by Metropolitan leases that were previously memorialized in written board letters, meeting minutes, and other documents.

Metropolitan owns land within the Palo Verde region in both the county of Riverside and the county of Imperial. These lands have historically been leased by Metropolitan to farmers under innovative leases that encourage water supply preservation and efficient water consumption in a manner that is consistent with Metropolitan’s Colorado River and water supply policies. Some of these lands have also been enrolled in a 35-year rotational fallowing program in conjunction with the Palo Verde Irrigation District.

No change in property use is contemplated herein, and the Board declaration of the identified lands as “exempt surplus lands” in the resolution accompanying this board letter is solely for reporting and record keeping convenience.

Details

Background

Metropolitan owns approximately 29,000 acres of land with Priority 1 and 3 water rights within the Palo Verde region in the counties of Riverside and Imperial. Since Metropolitan began purchasing land in the region in 2001 for agricultural purposes, it began leasing most of its acquired property under innovative agreements providing rent reduction incentives and other inducements to decrease water consumption on Metropolitan-owned land. Metropolitan and the Palo Verde Irrigation District (PVID) also entered into a memorandum of understanding in 2001, which established an ongoing Property Utilization Committee for Metropolitan and PVID to discuss, analyze, and review Metropolitan’s actions on such properties.

Before Metropolitan may award new or amended leases going forward to farmers in the Palo Verde region lands, the Board is required under the new Surplus Land Regulations to declare subject properties as exempt surplus lands that may be used in furtherance of Metropolitan’s agency purposes. The requested declaration is set forth in the resolution attached to this board letter (**Attachment 1**) and will be submitted to the California Department of Housing and Community Development, the entity with oversight over local agencies’ compliance with the Surplus Lands Act. No dispositions or allocations to specific tenants are implemented by this action, and the requested action by the Board is only intended to place in resolution form the “agency purpose” findings previously set forth in board meeting minutes, board letters, and other written materials on a parcel or lease agreement specific basis.

Requested Exempt Surplus Determination

Staff recommends that the Board adopt the resolution declaring the agricultural lands listed in the attached resolution in the Palo Verde region to be exempt surplus land under the Surplus Lands Act.

Basis for Findings that Parcels are Surplus Land

The identified Metropolitan-owned parcels in the Palo Verde region have been historically used to promote water-efficient farming practices and to further participation in fallowing efforts through the issuance of long-term agricultural leases to farmers with specific contractual obligations and restrictions. No change in the use of these lands is declared or implemented by the attached resolution.

The following Metropolitan policies and agency purposes would be promoted by declaring the identified lands in the Palo Verde Valley as exempt surplus lands when devoted to innovative, water-efficient farming leases:

- Furtherance of written Colorado River and water conservation policies and plans adopted by the Board.
- Reduction of consumptive water use on the land by incentivizing less water-intensive crops or more efficient irrigation methods.
- Maintenance of a vibrant agricultural economy in the Palo Verde Valley by maintaining the lands as productive farmland and providing farmers flexibility to respond to market forces in their choice of crops and irrigation methods.
- Promotion of community acceptance and participation by creating a fair and transparent process for lease selection and soliciting input from the community.
- Advancement of state-of-the-art farming techniques by encouraging innovative irrigation methods, crop selection, and data collection methods.
- Keeping administrative overhead low by limiting the total number of leases to be administered.
- Provision of a positive revenue stream for Metropolitan by generating rents and reflecting a balance between the value of the agricultural land and the unique lease conditions in place to achieve agency water objectives.

Policy

Metropolitan Water District Administrative Code §§ 8240-8258: Disposal of Real Property

Metropolitan Water District Administrative Code Section 11104: Delegation of Responsibilities

By Minute Item 41222, dated January 10, 1995, the Board adopted a policy that Metropolitan continue to seek ways to increase the reliability of its Colorado River supplies in order to operate the Colorado River Aqueduct at capacity as much of the time as is feasible.

By Minute Item 42820, dated February 10, 1998, the Board approved the policy principle on Colorado River Resources Strategy supporting Metropolitan's interests and increasing its dependable entitlements to Colorado River water, while collaborating with other California Colorado River agencies.

By Minute Item 44542, dated July 10, 2001, the Board approved Principles of Agreement for a Land Management, Crop Rotation, and Water Supply Program with Palo Verde Irrigation District.

By Minute Item 45053, dated October 22, 2002, the Board authorized entering into agreements for the Palo Verde Irrigation District Land Management, Crop Rotation, and Water Supply Program and community improvement programs.

By Minute Item 45517, dated September 23, 2003, the Board approved the Quantification Settlement Agreement (QSA) and related agreements among Imperial Irrigation District, Coachella Valley Water District, San Diego County Water Authority, and Metropolitan. Under the QSA, Metropolitan could acquire Colorado River water from PVID during the Quantification period without objection by IID and/or CVWD.

By Minute Item 48766, dated August 16, 2011, the Board adopted the proposed policy principles for managing Metropolitan's real property assets.

By Minute Item 50446, dated April 12, 2016, the Board authorized staff to negotiate new leases with HayDay Farms and River Valley Ranches, with lease terms to meet the objectives stated in the board letter for consumptive water use and positive revenue and pursue leasing the remaining Metropolitan-owned lands.

By Minute Item 51254, dated July 10, 2018, the Board authorized lease amendments with Coxco LLC, Joey Deconinck Farms, HayDay Farms and River Valley Ranches that implement a rent structure based on crop choice rather than water use targets.

California Environmental Quality Act (CEQA)

CEQA determination for Option #1:

The proposed action is not defined as a project under CEQA (Public Resources Code Section 21065, State CEQA Guidelines Section 15378) because the proposed action will not cause either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment and involves continuing administrative activities, such as general policy and procedure making (Section 15378(b)(2) of the State CEQA Guidelines). In addition, where it can be seen with certainty that there is no possibility that the proposed action in question may have a significant effect on the environment, the proposed action is not subject to CEQA (Section 15061(b)(3) of the State CEQA Guidelines).

CEQA determination for Option #2:

None required

Board Options

Option #1

Adopt the resolution declaring certain Metropolitan-owned real property in the Palo Verde Valley in the counties of Imperial and Riverside as exempt surplus land pursuant to California Government Code Section 54221.

Fiscal Impact: There is no immediate financial impact or budget action necessary as a result of the recommended declaration of land categorization. When staff returns to the Board with proposals for specific leases, the financial impacts of each proposed agricultural lease will be provided.

Business Analysis: Adoption of the resolution will provide additional flexibility to Metropolitan staff in the area of property management and dispositions.

Option #2

Do not adopt the resolution declaring certain property as exempt surplus land.

Fiscal Impact: Continued ownership and lease management expenses associated with the existing lease and land management arrangements.

Business Analysis: The record keeping and reporting convenience of a declaration of land categorization and agency purposes in the Palo Verde region in a single resolution will be foregone.

Staff Recommendation

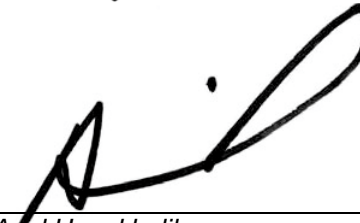
Option #1



Lilly L. Shraibati
Group Manager, Real Property Group

9/30/2021

Date



Adel Hagekhalil
General Manager

10/5/2021

Date

Attachment 1 – Resolution of Exempt Surplus Land

Ref# rpd12679931

THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

RESOLUTION _____

RESOLUTION OF THE BOARD OF DIRECTORS OF THE METROPOLITAN
WATER DISTRICT OF SOUTHERN CALIFORNIA DECLARING CERTAIN
METROPOLITAN OWNED REAL PROPERTIES IN THE PALO VERDE
VALLEY IN THE COUNTIES OF IMPERIAL AND RIVERSIDE AS EXEMPT
SURPLUS LAND PURSUANT TO CALIFORNIA GOVERNMENT CODE
SECTION 54221

WHEREAS, the Metropolitan Water District of Southern California (“Metropolitan”) is the fee owner of certain real properties identified by assessor parcel number in this Resolution and located in the Palo Verde Valley, in both Riverside County and Imperial County, California, listed in Exhibit A hereto and incorporated by reference (each, a “Property” and collectively, the “Properties”).

WHEREAS, Metropolitan is a metropolitan water district created under the authority of the Metropolitan Water District Act (California Statutes 1927, Chapter 429, as reenacted in 1969 as Chapter 209, as amended) (the “Act”) which authorizes Metropolitan amongst other things to: expand water conservation, water recycling, and groundwater recovery efforts in a sustainable, environmentally sound, and cost-effective manner; acquire water and water rights within or without the state; develop, store, and transport water; provide, sell, and deliver water at wholesale for municipal and domestic uses and purposes; and acquire, construct, operate, and maintain any and all works, facilities, improvements, and property necessary or convenient to the exercise of such powers.

WHEREAS, Metropolitan desires to lease or otherwise devote each of the Properties in the future for continued agricultural and other uses that specifically promote, implement and showcase to other agricultural entities in the region water-efficient farming practices that operate in a cost-effective and sustainable manner and that also, as set forth in regional fallowing programs and/or contract and other legal documents, are subject to water fallowing requirements, so as to provide sustainable activities within the local economy and also preserve water supplies.

WHEREAS, the leasing of the lands for the purposes identified herein would further Metropolitan water supply and water efficiency policies expressed in the following actions: (1) By Minute Item 41222, dated January 10, 1995, the Board adopted a policy that Metropolitan continue to seek ways to increase the reliability of its Colorado River supplies in order to operate the Colorado River Aqueduct at capacity as much of the time as is feasible; (2) By Minute Item 42820, dated February 10, 1998, the Board approved the policy principle on Colorado River Resources Strategy supporting Metropolitan's interests and increasing its dependable entitlements to Colorado River water, while collaborating with other California Colorado River agencies; (3) By Minute Item 44542, dated July 10, 2001, the Board approved Principles of Agreement for a Land Management, Crop Rotation, and Water Supply Program with Palo Verde Irrigation District; (4) By Minute Item 45053, dated October 22, 2002, the Board authorized entering into agreements for the Palo Verde Irrigation District Land Management, Crop Rotation, and Water Supply Program and community improvement programs; (5) By Minute Item 45517, dated September 23, 2003, the Board approved the Quantification Settlement Agreement (QSA) and related agreements among Imperial Irrigation District, Coachella Valley Water District, San Diego County Water Authority, and Metropolitan. Under the QSA, Metropolitan could acquire Colorado River water from PVID during the Quantification period without objection by IID and/or CVWD; (6) By Minute Item 48766, dated August 16, 2011, the Board adopted the proposed policy principles for managing Metropolitan's real property assets; and (7) By Minute Item 50446, dated April 12, 2016, the Board authorized staff to negotiate new leases, with lease terms to meet the objectives stated in the board letter for consumptive water use and positive revenue.

WHEREAS, pursuant to Section 54221(b)(1) of the Surplus Land Act (California Government Code Sections 54220 – 54234), the Board of Directors of Metropolitan (the "Board") must declare the Properties to be "surplus land" or "exempt surplus land" before Metropolitan may take any action to dispose of the Properties, whether by sale or lease.

WHEREAS, Government Code Section 54221(f)(1)(J) defines "exempt surplus land" to include real property that is used by a district for agency's use expressly authorized in Government Code Section 54221(c).

WHEREAS, Section 54221(c)(1) of the Government Code provides that "agency's use" may include commercial or industrial uses or activities, including nongovernmental retail, entertainment or office development, or be for the sole purpose of investment or generation of

revenue if the agency's governing body takes action in a public meeting declaring that the use of the site will directly further the express purpose of agency work or operations.

NOW, THEREFORE, the Board of Directors of The Metropolitan Water District of Southern California does hereby resolve, determine and order as follows:

1. The above recitals are true and correct and are a substantive part of this Resolution.
2. The Properties are "exempt surplus land" pursuant to California Government Code Section 54221(f)(1)(J) and 54221(c)(1) because the use of the Properties for water efficient farming purposes and/or subjecting the Properties to fallowing requirements constitute an "agency use" for purposes of the Surplus Land Act, under the grounds set forth in the board letter accompanying this resolution and incorporated by reference and for the following reasons: (a) such land would be used in furtherance of written Colorado River and water conservation policies and plans adopted by the Board; (b) the Board further finds and declares that the leasing or restriction of such land for water efficient agricultural purposes and/or subjecting such land to water fallowing requirements would directly further the express purpose of Metropolitan work or operations and statutory authorizations for water conservation, water recycling, and groundwater recovery efforts in a sustainable, environmentally sound, and cost-effective manner, the development, storage, and transportation of Colorado River water supplies, the provision, sale, and delivery of water, and the demonstration of innovative agricultural practices that can serve as a model for other growers in the region and support the agricultural economy and local community within the Palo Verde Valley; (c) such land would be used in water agency structured leases that would reduce consumptive water use on the land by incentivizing less water-intensive crops or more efficient irrigation methods, thereby increasing Colorado River supplies available to Metropolitan; (d) such lands would be used to maintain a vibrant agricultural economy in the Palo Verde Valley by maintaining the lands as productive farmland and providing farmers flexibility to respond to market forces in their choice of crops and irrigation methods; (e) such lands would be used to promote community acceptance and participation by creating a fair and transparent process for lease selection and soliciting input from the community; (f) such lands would be used to advance state-of-the-art farming techniques by encouraging innovative irrigation methods, crop selection, and

data collection methods that can serve as a model for other users; and (g) such lands would be used to generate offsetting lease revenues that will directly further the express purpose of agency work or operations.

3. Metropolitan staff is hereby authorized to provide the Department of Housing and Community Development (“HCD”) all necessary documentation and to take such actions as deemed necessary or proper to effectuate the purposes of this Resolution.

I HEREBY CERTIFY, that the foregoing is a full, true and correct copy of a Resolution adopted by the Board of Directors of The Metropolitan Water District of Southern California, at its meeting held _____, 2021.

Secretary of the Board of Directors
of The Metropolitan Water District
of Southern California

EXHIBIT A**PALO VERDE VALLEY PROPERTIES****EXEMPT SURPLUS LAND
ASSESSORS PARCEL NUMBERS**

<u>Grouping 1</u>		<u>Grouping 2</u>	<u>Grouping 3</u>		<u>Grouping 4</u>	<u>cont'd below</u>
RIV. CO.	879-240-007	IMP. CO.	RIV. CO.	878-020-008	RIV. CO.	
878-081-001	879-240-029	006-090-008	821-100-018	878-030-009	833-210-006	
878-081-002	879-240-032	006-090-009	821-100-019	878-030-016	833-210-012	
878-081-004	879-240-033	006-090-010	821-150-018	878-091-001	833-260-001	
878-081-005	879-261-004	006-090-011	821-160-012	878-091-005	833-260-003	
878-081-006	879-262-005	006-090-012	821-160-013	878-091-006	833-260-004	
878-081-012	879-262-011	006-090-013	824-200-048		833-260-005	
878-082-001	879-262-014	006-090-029	863-140-002		833-270-003	
878-082-007		006-120-082	863-150-001		833-270-004	
878-111-017	IMP. CO.	006-120-089	863-170-005		833-270-005	
878-112-014	006-090-003	006-150-065	863-170-006			
878-112-015	006-210-009	006-220-057	863-180-003			
878-120-013	006-210-021		863-180-004			
878-120-015	006-210-029		863-180-005			
878-130-010	006-220-010		863-220-005			
878-130-011	006-220-013		866-040-004			
878-161-014	006-220-019		866-040-005			
878-161-015	006-220-021		866-040-007			
878-162-002	006-220-022		866-040-008			
878-162-003	006-220-058		866-080-001			
878-191-004			866-080-002			
878-192-001			866-080-003			
878-192-002			866-080-005			
878-193-007			866-080-012			
878-193-011			866-090-002			
878-193-013			866-090-009			
878-201-001			866-090-010			
878-220-005			866-090-013			
878-220-014			866-090-014			
878-220-015			872-150-005			
878-230-006			872-160-006			
878-230-007			872-160-007			
878-230-008			872-160-008			
878-240-021			872-160-009			
879-210-026			872-180-006			
			872-180-009			
			878-020-004			
			878-020-005			

<u>Grouping 5</u>			<u>Grouping 6</u>	<u>Grouping 7</u>	<u>Grouping 8</u>	<u>Grouping 9</u>
RIV. CO.	875-021-008	878-092-018	RIV. CO.	RIV. CO.	RIV. CO.	RIV. CO.
866-130-001	875-021-013	878-101-004	827-190-003	830-210-009	815-190-007	815-302-008
866-130-002	875-021-014	878-101-005	827-190-004	830-210-010	815-190-012	815-310-013
866-130-003	875-022-003	878-151-004	827-190-005	833-210-013	815-190-014	815-320-007
866-130-004	875-022-004	878-151-005	827-190-006	833-220-003	815-200-007	827-080-029
866-210-006	875-022-005	878-152-003	827-190-007	833-230-001	815-200-011	833-030-012
866-210-010	875-022-006	878-152-031	827-190-009	833-230-002	827-061-004	833-050-014
866-240-004	875-022-012	878-202-003	827-190-010	833-280-002	827-061-005	
866-20-009	875-030-012	878-202-005	827-190-012		827-062-006	
866-250-008	875-030-014	878-240-009	833-060-001		827-062-007	
866-250-009	875-030-027	878-240-010	833-060-004		827-062-008	
866-250-011	875-030-028	878-240-011	833-060-018		827-062-016	
869-130-001	875-040-006	878-240-012	833-060-024		827-062-017	
869-270-006	875-071-001		833-060-025		827-071-002	
869-270-010	875-071-002		833-060-026		827-080-004	
869-291-002	875-071-003		833-060-030		827-080-008	
869-291-003	875-071-004		833-100-005		827-080-010	
869-291-005	875-071-005		833-100-007		827-080-027	
869-291-009	875-071-006		833-100-011		827-080-028	
869-292-001	875-071-007		833-100-012		830-230-006	
869-292-002	875-071-012		833-100-016		833-140-005	
869-292-003	875-071-013		833-100-017			
872-080-006	875-071-014					
872-080-007	875-071-015					
872-080-008	875-131-005					
872-090-005	875-131-006					
872-090-006	875-131-009					
872-090-007	875-131-010					
872-090-008	875-171-001					
872-100-001	875-171-002					
872-340-014	875-250-010					
872-340-018	878-040-008					
872-352-003	878-050-003					
872-352-010	878-050-004					
872-352-017	878-050-005					
872-360-001	878-050-006					
872-360-003	878-050-010					
872-370-002	878-050-011					
872-370-008	878-050-012					
872-370-013	878-050-013					
872-370-014	878-060-002					
872-370-016	878-070-001					
872-370-018	878-092-003					
875-021-006	878-092-016					
875-021-007	878-092-017					



Declare Certain Metropolitan Owned Properties in the Palo Verde Valley as Exempt Surplus Land

Real Property & Asset Management Committee
Item 7-9
October 12, 2021

District Powers Regarding the Use of Land



- Both infrastructure and operations and activities

- Leases to encourage water conservation, water supply and other metropolitan water district purposes



New Surplus Land Act Record Keeping and Reporting Requirements



- Assembly Bill 1486
- Documentation of public agency purposes
- Previously memorialized in board letters and meeting minutes
- New regulations recommend resolution format

Palo Verde Valley Agricultural Lands Resolution



- Continuation of Innovative Agricultural Leases
- Declaration of Agency's Purposes and Status as "Exempt Surplus Land"

Board Options

- Option #1

- Adopt the resolution declaring certain Metropolitan-owned real property in the Palo Verde Valley in the counties of Imperial and Riverside as exempt surplus land pursuant to California Government Code Section 54221.

- Option #2

- Do not adopt the resolution.

Staff Recommendation

- Option #1



**THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA**

RESOLUTION 9286

**RESOLUTION
OF THE BOARD OF DIRECTORS
OF THE METROPOLITAN WATER DISTRICT OF SOUTHERN
CALIFORNIA DECLARING CERTAIN METROPOLITAN OWNED REAL
PROPERTIES IN THE PALO VERDE VALLEY IN THE COUNTIES OF
IMPERIAL AND RIVERSIDE AS EXEMPT SURPLUS LAND PURSUANT
TO CALIFORNIA GOVERNMENT CODE SECTION 54221**

WHEREAS, the Metropolitan Water District of Southern California (“Metropolitan”) is the fee owner of certain real properties identified by assessor parcel number in this Resolution and located in the Palo Verde Valley, in both Riverside County and Imperial County, California, listed in Exhibit A hereto and incorporated by reference (each, a “Property” and collectively, the “Properties”).

WHEREAS, Metropolitan is a metropolitan water district created under the authority of the Metropolitan Water District Act (California Statutes 1927, Chapter 429, as reenacted in 1969 as Chapter 209, as amended) (the “Act”) which authorizes Metropolitan amongst other things to: expand water conservation, water recycling, and groundwater recovery efforts in a sustainable, environmentally sound, and cost-effective manner; acquire water and water rights within or without the state; develop, store, and transport water; provide, sell, and deliver water at wholesale for municipal and domestic uses and purposes; and acquire, construct, operate, and maintain any and all works, facilities, improvements, and property necessary or convenient to the exercise of such powers.

WHEREAS, Metropolitan desires to lease or otherwise devote each of the Properties in the future for continued agricultural and other uses that specifically promote, implement and showcase to other agricultural entities in the region water-efficient farming practices that operate in a cost-effective and sustainable manner and that also, as set forth in regional fallowing programs and/or contract and other legal documents, are subject to water fallowing requirements, so as to provide sustainable activities within the local economy and also preserve water supplies.

WHEREAS, the leasing of the lands for the purposes identified herein would further Metropolitan water supply and water efficiency policies expressed in the following actions: (1) By Minute Item 41222, dated January 10, 1995, the Board adopted a policy that Metropolitan continue to seek ways to increase the reliability of its Colorado River supplies in order to operate the Colorado River Aqueduct at capacity as much of the time as is feasible; (2) By Minute Item 42820, dated February 10, 1998, the Board approved the policy principle on Colorado River Resources Strategy supporting Metropolitan's interests and increasing its dependable entitlements to Colorado River water, while collaborating with other California Colorado River agencies; (3) By Minute Item 44542, dated July 10, 2001, the Board approved Principles of Agreement for a Land Management, Crop Rotation, and Water Supply Program with Palo Verde Irrigation District; (4) By Minute Item 45053, dated October 22, 2002, the Board authorized entering into agreements for the Palo Verde Irrigation District Land Management, Crop Rotation, and Water Supply Program and community improvement programs; (5) By Minute Item 45517, dated September 23, 2003, the Board approved the Quantification Settlement Agreement (QSA) and related agreements among Imperial Irrigation District, Coachella Valley Water District, San Diego County Water Authority, and Metropolitan. Under the QSA, Metropolitan could acquire Colorado River water from PVID during the Quantification period without objection by IID and/or CVWD; (6) By Minute Item 48766, dated August 16, 2011, the Board adopted the proposed policy principles for managing Metropolitan's real property assets; and (7) By Minute Item 50446, dated April 12, 2016, the Board authorized staff to negotiate new leases, with lease terms to meet the objectives stated in the board letter for consumptive water use and positive revenue.

WHEREAS, pursuant to Section 54221(b)(1) of the Surplus Land Act (California Government Code Sections 54220 – 54234), the Board of Directors of Metropolitan (the "Board") must declare the Properties to be "surplus land" or "exempt surplus land" before Metropolitan may take any action to dispose of the Properties, whether by sale or lease.

WHEREAS, Government Code Section 54221(f)(1)(J) defines "exempt surplus land" to include real property that is used by a district for agency's use expressly authorized in Government Code Section 54221(c).

WHEREAS, Section 54221(c)(1) of the Government Code provides that "agency's use" may include commercial or industrial uses or activities, including nongovernmental retail, entertainment or office development, or be for the sole purpose of investment or generation of

revenue if the agency's governing body takes action in a public meeting declaring that the use of the site will directly further the express purpose of agency work or operations.

NOW, THEREFORE, the Board of Directors of The Metropolitan Water District of Southern California does hereby resolve, determine and order as follows:

1. The above recitals are true and correct and are a substantive part of this Resolution.
2. The Properties are "exempt surplus land" pursuant to California Government Code Section 54221(f)(1)(J) and 54221(c)(1) because the use of the Properties for water efficient farming purposes and/or subjecting the Properties to fallowing requirements constitute an "agency use" for purposes of the Surplus Land Act, under the grounds set forth in the board letter accompanying this resolution and incorporated by reference and for the following reasons: (a) such land would be used in furtherance of written Colorado River and water conservation policies and plans adopted by the Board; (b) the Board further finds and declares that the leasing or restriction of such land for water efficient agricultural purposes and/or subjecting such land to water fallowing requirements would directly further the express purpose of Metropolitan work or operations and statutory authorizations for water conservation, water recycling, and groundwater recovery efforts in a sustainable, environmentally sound, and cost-effective manner, the development, storage, and transportation of Colorado River water supplies, the provision, sale, and delivery of water, and the demonstration of innovative agricultural practices that can serve as a model for other growers in the region and support the agricultural economy and local community within the Palo Verde Valley; (c) such land would be used in water agency structured leases that would reduce consumptive water use on the land by incentivizing less water-intensive crops or more efficient irrigation methods, thereby increasing Colorado River supplies available to Metropolitan; (d) such lands would be used to maintain a vibrant agricultural economy in the Palo Verde Valley by maintaining the lands as productive farmland and providing farmers flexibility to respond to market forces in their choice of crops and irrigation methods; (e) such lands would be used to promote community acceptance and participation by creating a fair and transparent process for lease selection and soliciting input from the community; (f) such lands would be used to advance state-of-the-art farming techniques by encouraging innovative irrigation methods, crop selection, and

data collection methods that can serve as a model for other users; and (g) such lands would be used to generate offsetting lease revenues that will directly further the express purpose of agency work or operations.

3. Metropolitan staff is hereby authorized to provide the Department of Housing and Community Development (“HCD”) all necessary documentation and to take such actions as deemed necessary or proper to effectuate the purposes of this Resolution.

I HEREBY CERTIFY, that the foregoing is a full, true and correct copy of a Resolution adopted by the Board of Directors of The Metropolitan Water District of Southern California, at its meeting held October 12, 2021.



Secretary of the Board of Directors
of The Metropolitan Water District
of Southern California

EXHIBIT A

PALO VERDE VALLEY PROPERTIES

EXEMPT SURPLUS LAND

ASSESSORS PARCEL NUMBERS

<u>Grouping 1</u>		<u>Grouping 2</u>	<u>Grouping 3</u>		<u>Grouping 4</u>	<u>cont'd below</u>
RIV. CO.	879-240-007	IMP. CO.	RIV. CO.	878-020-008	RIV. CO.	
878-081-001	879-240-029	006-090-008	821-100-018	878-030-009	833-210-006	
878-081-002	879-240-032	006-090-009	821-100-019	878-030-016	833-210-012	
878-081-004	879-240-033	006-090-010	821-150-018	878-091-001	833-260-001	
878-081-005	879-261-004	006-090-011	821-160-012	878-091-005	833-260-003	
878-081-006	879-262-005	006-090-012	821-160-013	878-091-006	833-260-004	
878-081-012	879-262-011	006-090-013	824-200-048		833-260-005	
878-082-001	879-262-014	006-090-029	863-140-002		833-270-003	
878-082-007		006-120-082	863-150-001		833-270-004	
878-111-017	IMP. CO.	006-120-089	863-170-005		833-270-005	
878-112-014	006-090-003	006-150-065	863-170-006			
878-112-015	006-210-009	006-220-057	863-180-003			
878-120-013	006-210-021		863-180-004			
878-120-015	006-210-029		863-180-005			
878-130-010	006-220-010		863-220-005			
878-130-011	006-220-013		866-040-004			
878-161-014	006-220-019		866-040-005			
878-161-015	006-220-021		866-040-007			
878-162-002	006-220-022		866-040-008			
878-162-003	006-220-058		866-080-001			
878-191-004			866-080-002			
878-192-001			866-080-003			
878-192-002			866-080-005			
878-193-007			866-080-012			
878-193-011			866-090-002			
878-193-013			866-090-009			
878-201-001			866-090-010			
878-220-005			866-090-013			
878-220-014			866-090-014			
878-220-015			872-150-005			
878-230-006			872-160-006			
878-230-007			872-160-007			
878-230-008			872-160-008			
878-240-021			872-160-009			
879-210-026			872-180-006			
			872-180-009			
			878-020-004			
			878-020-005			

<u>Grouping 5</u>			<u>Grouping 6</u>	<u>Grouping 7</u>	<u>Grouping 8</u>	<u>Grouping 9</u>
RIV. CO.	875-021-008	878-092-018	RIV. CO.	RIV. CO.	RIV. CO.	RIV. CO.
866-130-001	875-021-013	878-101-004	827-190-003	830-210-009	815-190-007	815-302-008
866-130-002	875-021-014	878-101-005	827-190-004	830-210-010	815-190-012	815-310-013
866-130-003	875-022-003	878-151-004	827-190-005	833-210-013	815-190-014	815-320-007
866-130-004	875-022-004	878-151-005	827-190-006	833-220-003	815-200-007	827-080-029
866-210-006	875-022-005	878-152-003	827-190-007	833-230-001	815-200-011	833-030-012
866-210-010	875-022-006	878-152-031	827-190-009	833-230-002	827-061-004	833-050-014
866-240-004	875-022-012	878-202-003	827-190-010	833-280-002	827-061-005	
866-20-009	875-030-012	878-202-005	827-190-012		827-062-006	
866-250-008	875-030-014	878-240-009	833-060-001		827-062-007	
866-250-009	875-030-027	878-240-010	833-060-004		827-062-008	
866-250-011	875-030-028	878-240-011	833-060-018		827-062-016	
869-130-001	875-040-006	878-240-012	833-060-024		827-062-017	
869-270-006	875-071-001		833-060-025		827-071-002	
869-270-010	875-071-002		833-060-026		827-080-004	
869-291-002	875-071-003		833-060-030		827-080-008	
869-291-003	875-071-004		833-100-005		827-080-010	
869-291-005	875-071-005		833-100-007		827-080-027	
869-291-009	875-071-006		833-100-011		827-080-028	
869-292-001	875-071-007		833-100-012		830-230-006	
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872-080-007	875-071-015					
872-080-008	875-131-005					
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872-090-007	875-131-010					
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872-352-010	878-050-004					
872-352-017	878-050-005					
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872-370-002	878-050-011					
872-370-008	878-050-012					
872-370-013	878-050-013					
872-370-014	878-060-002					
872-370-016	878-070-001					
872-370-018	878-092-003					
875-021-006	878-092-016					
875-021-007	878-092-017					



• **Board of Directors**
Real Property and Asset Management Committee

10/12/2021 Board Meeting

7-10

Subject

Review and consider the city of Perris' certified Final Environmental Impact Report and take related CEQA actions, and authorize the General Manager to grant a permanent easement to the city of Perris for public road purposes traversing Metropolitan fee-owned property in the city of Perris and identified as Riverside County Assessor Parcel Numbers 317-170-017 and 303-050-003

Executive Summary

This action authorizes the General Manager to grant a permanent easement to the city of Perris for public road purposes for the extension of Webster Avenue, which traverses Metropolitan's fee-owned Colorado River Aqueduct (CRA) right-of-way. The road improvements are being constructed to accommodate an industrial development located just south of the CRA. Board authorization to grant this permanent easement is required as the real property interest to be conveyed exceeds five years.

Details

Background

The city of Perris is requesting a 94-foot wide permanent easement across Metropolitan's fee-owned property to allow for the extension of Webster Avenue to a new industrial development project located just east of Interstate 215 and south of Metropolitan's property in the city of Perris (**Attachment 1**). Metropolitan's CRA tunnel is located approximately 50 feet below the surface within the area of the proposed easement. The requested easement area is approximately one acre.

A 60-foot-wide strip of Webster Avenue in the area of Metropolitan's property was designated for public road purposes prior to Metropolitan's acquisition of the property for the CRA. At the time it was not improved and was not accepted by the county of Riverside (now the city of Perris) as a public road. The proposed easement will expand the width of Webster Avenue and resolve any issues related to the portion of the designated but unaccepted Webster Avenue.

The proposed improvements within the public road will include street, sidewalks, driveways, streetlights, and related infrastructure. The city of Perris will assume responsibility for the public street within this easement area. Staff evaluations have determined that the easement will not interfere with Metropolitan's water operations.

The proposed permanent easement for public road purposes will have the following key provisions:

- Mutually compatible use between two public entities with prior rights provisions for Metropolitan.
- For the construction, operation and maintenance of a public road and related facilities.
- All plans for construction, maintenance, major repair, or replacement work shall be reviewed and approved by Metropolitan prior to the commencing of such work.

The fair market value for the proposed easement is \$291,000 as determined by a qualified licensed appraiser. Metropolitan will also receive one-time processing fees of \$8,500.

Policy

Metropolitan Water District Administrative Code Section 8230: Grants of Real Property Interests

Metropolitan Water District Administrative Code Section 8231: Appraisal of Real Property Interests

Metropolitan Water District Administrative Code Section 8232: Terms and Conditions of Management

By Minute Item 48766, dated August 16, 2011, the Board adopted the proposed policy principles for managing Metropolitan's real property assets.

California Environmental Quality Act (CEQA)

CEQA determination for Option #1:

Pursuant to the provisions of CEQA and the State CEQA Guidelines, the city of Perris, acting as the Lead Agency, certified a Final Environmental Impact Report on July 13, 2011, for the Rados Distribution Center. Metropolitan, acting as a Responsible Agency under CEQA, is required to certify that it has reviewed and considered the information in the Final EIR and adopt the Lead Agency's findings, mitigation measures, and statement of overriding considerations relevant to Metropolitan's approval of the proposed easement. The environmental documentation is in **Attachment 2**.

CEQA determination for Option #2:

None required

Board Options

Option #1

Review and consider the city of Perris' certified Final Environmental Impact Report, and take related CEQA actions; and authorize the granting of a permanent easement for public road purposes to the city of Perris.

Fiscal Impact: Metropolitan will receive positive revenue in the form of a one-time payment of \$8,500 for processing fees and \$291,000 as the fair market value for the easement area.

Business Analysis: Cooperation with other agencies, by granting easements and other rights of entry, furthers the public interest, and facilitates Metropolitan obtaining easements and other property rights critical for its operations. Metropolitan will also receive positive revenue in the form of fees and fair market value for the easement.

Option #2

Do not authorize the permanent easement.

Fiscal Impact: Metropolitan will forgo one-time transaction and conveyance fees of \$458,500.

Business Analysis: The city of Perris will not be permitted to construct and maintain a public road within Metropolitan property and may use eminent domain action to obtain the necessary easement. This option could hinder opportunities to obtain rights or permits for Metropolitan projects from the city in the future.

Staff Recommendation

Option #1



Lilly L. Shraibati
Group Manager

9/29/2021

Date

Adel Hagekhalil
General Manager

9/29/2021

*Date***Attachment 1 – Site Map****Attachment 2 – Environmental Documentation**

Ref# rpam12684362

General Location Map





THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA
700 N. Alameda Street, Los Angeles, California 90012

10/12/2021 Board Meeting

Board Letter # 7-10

Review and consider the city of Perris' certified Final Environmental Impact Report and take related CEQA actions, and authorize the General Manager to grant a permanent easement to the city of Perris for public road purposes traversing Metropolitan fee-owned property in the city of Perris and identified as Riverside County Assessor Parcel Numbers 317-170-017 and 303-050-003

Attachment 2 – EIR Documentation

The CEQA documentation attachments are not included

You may review these documents on our website at:
<http://mwdh2o.com/WhoWeAre/Board/Board-Meeting>

OR

By contacting Metropolitan's Board Executive Secretary at: (213) 217-6291
or via email at DL-BoardSupportTeam@mwdh2o.com

Final Environmental Impact Report for Rados Distribution Center Perris, California



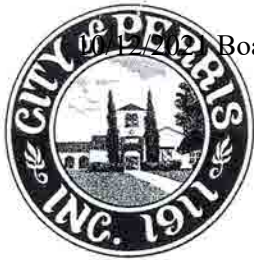
Lead Agency
City of Perris
135 North D Street
Perris, CA 92570

August 2010



A L B E R T A .
WEBB
A S S O C I A T E S

1033



NOTICE OF DETERMINATION

TO: X Office of Planning and Research
 1400 10th Street, Room 121
 Sacramento, CA 95814

X Riverside County Clerk
 2724 Gateway Drive
 Riverside, CA 92507

FILED
 RIVERSIDE COUNTY

JUL 13 2011

LARRY W. WARD, County Clerk
 By *[Signature]* Department of Conservation
 Division of Land Resource Protection
 801 K Street, MS 18-01
 Sacramento, CA 95814

DATE: July 13, 2011

SUBJECT: Filing of Notice of Determination in compliance with Section 21108 or 21152 of the Public Resources Code

Project Title: **Rados Distribution Center – Perris, Zone Change 07-0117, Development Plan Review 07-0119, and Agricultural Diminishment 07-0118**

State Clearinghouse No.: SCH No. 2008111080

Contact Person: Diane Sbardellati, Associate Planner **Telephone No.:** (951) 943-5003

Project Location: Northeast corner of Rider Street and Webster Avenue, City of Perris, County of Riverside (APNs 303-050-002, 303-050-003)

Project Description: The Project (Development Plan Review 07-0119, Zone Change 07-0117, and Agricultural Diminishment 07-0118) proposes construction and operation of approximately 1,191,080 square feet of distribution center uses and all supporting improvements. As proposed, one building will be constructed within the approximately 62-acre Project site. The MWD property to the north on APN 303-050-003 would be leased for use as overflow truck parking. An Agricultural Diminishment will be processed to cancel the Williamson Act contract on the property.

This is to advise that the Perris City Council (Lead Agency) has approved the above-described project on **July 12, 2011** and has made the following determinations regarding the above-described project:

1. The project will have a significant effect on the environment.
2. An Environmental Impact Report was prepared for this project pursuant to the provisions of CEQA.
3. Mitigation measures were made a condition of the approval of this project.
4. A mitigation monitoring and reporting program was adopted for this project.
5. A Statement of Overriding Considerations was adopted for this project.
6. Findings were made pursuant to the provisions of CEQA.

COUNTY CLERK
 Division of CEQA
 Filed per P.R.C. 21152
 POSTED

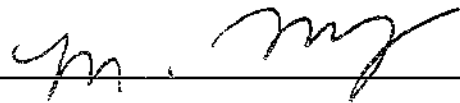
JUL 13 2011

This is to certify that the Final EIR with comments and responses and record of project approval is available to the general public at the Office of the City Clerk, 101 North "D" Street, Perris, California 92570.

Diane Sbardellati 7-13-11 *Assoc. Planner*
 Signature (Public Agency) Date Title

Date Received for filing and posting at OPR: _____

STATE OF CALIFORNIA - THE RESOURCES AGENCY
DEPARTMENT OF FISH AND GAME
ENVIRONMENTAL FILING FEE CASH RECEIPT

Receipt #: 201100586**State Clearinghouse # (if applicable): 2008111080***Lead Agency:* CITY OF PERRIS *Date:* 07/13/2011*County Agency of Filing:* Riverside *Document No:* 201100586*Project Title:* RADOS DISTRIBUTION CENTER - PERRIS, CZ 07-0117; DPD 07-0119;*Project Applicant Name:* CITY OF PERRIS *Phone Number:* _____*Project Applicant Address:* 135 NORTH 'D' ST PERRIS CA 92570-1998*Project Applicant:* Private EntityCHECK APPLICABLE FEES:☒ *Environmental Impact Report*2839.25☐ *Negative Declaration*☐ *Application Fee Water Diversion (State Water Resources Control Board Only)*☐ *Project Subject to Certified Regulatory Programs*☒ *County Administration Fee*\$64.00☐ *Project that is exempt from fees (DFG No Effect Determination (Form Attached))*☐ *Project that is exempt from fees (Notice of Exemption)***Total Received** 2903.25*Signature and title of person receiving payment:* _____*Notes:*

Rados Distribution Center

Perris, California

FINAL ENVIRONMENTAL IMPACT REPORT

SCH No. 2008111080

Project Applicant:

RADOS T.I.C.
2002 E. McFadden Avenue
Santa Ana, California
Contact: Les Brown, Director
(714) 835-4612

Lead Agency:

CITY OF PERRIS
Development Services Department
135 North "D" Street
Perris, CA 92570
Contact: Diane Sbardellati, Associate Planner, LEED AP
(951) 943-5003

Prepared by:

ALBERT A. WEBB ASSOCIATES
3788 McCray Street
Riverside, CA 92506
Contact: Eliza Laws, Associate Environmental Analyst
(951) 686-1070

August 2010

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3.0 MITIGATION MONITORING AND REPORTING PROGRAM

4.0 REVISED DRAFT EIR

1.0 INTRODUCTION

INTRODUCTION

The Final Environmental Impact Report (Final EIR or FEIR), as required pursuant to Sections 15089 and 15132 of the Guidelines for Implementation of the California Environmental Quality Act (*CEQA Guidelines*), includes the Draft Environmental Impact Report (Draft EIR or DEIR) or a revision thereof, comments and recommendations received on the DEIR, a list of persons, organizations and public agencies commenting on the DEIR and the responses of the Lead Agency to significant environmental points raised in the review and consultation process. A Mitigation Monitoring and Reporting Program (MMRP) is also completed to ensure compliance with all adopted mitigation measures during project implementation (Public Resources Code Section 21081.6, *CEQA Guidelines* Section 15097).

RELATIONSHIP TO THE DRAFT EIR

Minor changes that better clarify or correct minor inaccuracies in the DEIR appear as revised pages in the *Corrections, Errata, and Changes from Draft to Final EIR* section which follows, herein. The DEIR copies considered by the decision making bodies and the City of Perris Development Services Department have been edited to show changes made to reflect corrections and responses to comments raised. Together with the MMRP (Section 3.0, herein) and the Findings, these documents constitute the environmental disclosure record that will serve as the basis for approval of the proposed project by the City of Perris.

CORRECTIONS, ERRATA AND CHANGES FROM DRAFT EIR TO FINAL EIR

Corrections, errata, and changes from the DEIR to FEIR represent additional information or corrections that do not change the project impacts and/or mitigation measures such that new or more severe environmental impacts result from the project. Such items are sometimes added as a result of comments received from responsible agencies, changes in the existing conditions at the site, revised public policies since the DEIR was written and minor corrections or clarifications.

The following summary will present the location and types of additions, and changes or corrections made within each section of the FEIR since the DEIR was published. The revised pages appear in the Revised Draft EIR included herein in strike-through/underline version (Section 4.0).

Section 1.0 – Executive Summary

Table 1.0-A, EIR Summary Matrix/Mitigation Monitoring Program, will be revised to be consistent with the changes identified to mitigation measures in Section 4.0, including below.

Section 2.0 – Introduction

No changes made to this section.

Section 3.0 – Project Description

No changes made to this section.

Section 4.0 – Potentially Significant Environmental Effects

Page 4.3-44 of the DEIR will be revised in response to comments from the South Coast Air Quality Management District (SCAQMD) as shown below:

Long-Term Impacts – LST Analysis

The following paragraphs summarize the findings of each criteria pollutant using SCAQMD's LST methodology as contained in the AQIA in Appendix C.

NO_x

For the project area, the maximum 1-hour NO₂ concentration in the last 3 years was 0.09 ppm. The Ambient Air Quality Standard (AAQS) for NO₂ is a 1-hour maximum concentration of 0.18 ppm. Therefore, the difference in concentrations is 0.09 ppm (170 µg/m³). Based on SCAQMD methodology, the project would be considered to have significant air quality impacts if NO₂ concentrations at the nearest sensitive receptor exceed 0.09 ppm. NO_x emissions are simulated in the air quality dispersion model and the NO₂ conversion rate is treated by a NO₂-to-NO_x ratio, which is a function of downwind distance. According to the LST methodology developed by staff at SCAQMD, at 5,000 meters downwind, 100 percent conversion of NO₂-to-NO_x is assumed. The nearest potential sensitive receptor is approximately 397 meters (approximately 1,300 feet) south. The NO_x concentration at this location is approximately 174.4765 µg/m³ and the NO₂-to-NO_x ratio is approximately 0.258. Therefore, the sensitive receptor will be exposed to an NO₂ concentration of approximately 45.016 µg/m³, which is less than the threshold of 170 µg/m³. The nearest commercial receptor with the highest concentration is approximately 25 meters west. The NO_x concentration at this location is approximately 1,145.02 µg/m³ and the NO₂-to-NO_x ratio is 0.053. Therefore, the commercial receptor will be exposed to an NO₂ concentration of 60.69 µg/m³, which again is less than the threshold of 170 µg/m³. Therefore, project operation will not cause an exceedance of the LST for NO₂ during project operation to either sensitive or commercial receptors.

MM Air 14 on page 4.3-60 of the DEIR, will be modified in response to recommendations made by the SCAQMD.

MM Air 14: The project shall provide information about diesel particulate traps and alternative fueled off road equipment to all customers. In order to promote alternative fuels, and help support “clean” truck fleets, the developer/successor-in-interest shall provide building occupants and businesses with information related to SCAQMD’s Carl Moyer Program, or other state programs that provide funding for cleaner than required heavy-duty engines and emission control devices, such as 2007 or newer model year or 2010 compliant vehicles.

MM Air 14a shall be added to page 4.3-60 in response to recommendations made by the SCAQMD, as follows:

MM Air 14a: Service equipment at the facility will be either low-emission propane powered or electric (i.e., forklifts).

Section 5.0 – Mandatory CEQA Topics

No changes made to this section.

PUBLIC REVIEW SUMMARY

The EIR process typically consists of three parts – the Notice of Preparation (NOP), Draft EIR (or DEIR), and Final EIR (or FEIR). The NOP for the proposed project was circulated to the State Clearinghouse, responsible agencies, and other interested parties on or about November 21, 2008. A notice advising of the availability of the NOP was posted by the Riverside County Clerk on November 24, 2008. Pursuant to Section 15082 of the *CEQA Guidelines*, recipients of the NOP were requested to provide responses within 30 days after their receipt of the NOP. Copies of both the NOP and comments received on the NOP are presented in Appendix A of the DEIR. In addition, a scoping meeting was held on December 3, 2008 before the City of Perris Planning Commission pursuant to the requirements of Section 15082(c)(1) of the *CEQA Guidelines*.

The City of Perris circulated the DEIR for the Rados Distribution Center – Perris from March 24, 2010 to May 7, 2010. Required distribution to the State Clearinghouse was completed on March 29, 2010, which extended public review through May 12, 2010. The Notice of Availability of the DEIR was circulated to the State Clearinghouse, responsible agencies, and other interested parties on or about March 24, 2010.

As provided in the public notice and in accordance with CEQA Section 21091(d), the City of Perris accepted written comments through May 12, 2010. Six letters were received via mail and/or email on or before May 12 from: Department of the Air Force, Native American Heritage Commission, Riverside County Transportation Commission, Riverside Transit Agency, South Coast Air Quality Management District, and Pechanga Cultural Resources. The following comment letters were received after the close of the public comment period between May 12 and May 20, 2010: Department of Conservation, Department of Toxic Substances Control, and the Governor's Office of Planning and Research. All letters are included in Section 2.0 of this FEIR and discussed in the Response to Comments, also in Section 2.0. In accordance with the provisions of Public Resources Code Section 21092.5, the City of Perris has provided a written proposed response to each commenting public agency no less than 10 days prior to the proposed certification date of the FEIR.

LIST OF PERSONS, ORGANIZATIONS, AND PUBLIC AGENCIES THAT COMMENTED ON THE DRAFT EIR

Federal Agencies

Department of the Air Force, Air Force Reserve Command (DAF)

State Agencies

Department of Conservation, Division of Land Resource Protection (DOC)

Department of Toxic Substances Control (DTSC)

Governor's Office of Planning and Research, State Clearinghouse and Planning Unit (OPR)

Native American Heritage Commission (NAHC)

Regional and Local Agencies

Riverside County Transportation Commission (RCTC)

Riverside Transit Agency (RTA)

South Coast Air Quality Management District (SCAQMD)

Native American Tribes

Pechanga Cultural Resources, Temecula Band of Luiseño Mission Indians

2.0 RESPONSE TO COMMENTS

Pursuant to CEQA Guidelines Section 15088, the responses to comments presented in this section address specific, relevant comments on environmental issues raised in the submitted comment letters. For clarification, copies of the original letters, including all attachments, are presented at the end of this section.

RESPONSE TO COMMENTS

FEDERAL AGENCIES

**Response to
Department of the Air Force, Air Force Reserve Command
Dated April 26, 2010**

DAF Comment #1:

1. The March Air Reserve Base (MARB) review of the proposal to construct and operate approximately 1,191,080 square feet of distribution center uses and all supporting improvements located North of Rider Street, South of the MWD Channel, East of Webster Avenue and West of Indian Avenue is provided with this memorandum.
2. This development is consistent with compatible land use and March Air Reserve Base (MARB) mission operations at the proposed location. The site does not occupy any area impacted by current mission aircraft noise, flight paths, or any zones related to localized aircraft incident statistics.
3. Thank you for the opportunity to review and comment on this proposed development. If you have any further questions please contact Mr. Jack Porter Jr. at (951) 655-2115.

Response to DAF Comment #1:

The City acknowledges that the proposed project is consistent with compatible land use and MARB mission operations and the project site does not occupy any area impacted by current mission aircraft noise, flight paths, or any zones related to localized aircraft statistics. No new significant environmental issues have been raised by this comment and no modification of the DEIR is required.

RESPONSE TO COMMENTS

STATE AGENCIES

**Response to
State of California, Department of Conservation,
Division of Land Resource Protection
Dated May 18, 2010**

DOC Comment 1

Division Comments:

After a review of the Agricultural Resources Section, the Division can find no mention of why partial mitigation was not considered for this project. The DEIR states that "... *although existing agricultural land within the City of Perris Planning Area 3 has not yet been formally committed to non-agricultural use through formal approval of development applications, it has all been designated for urban density land uses by the City of Perris General Plan.*" The DEIR also states that no mitigation is necessary because there is none available to reduce or eliminate impacts. In fact, mitigation for this loss of Prime and Farmland of Local Importance may be available, and is further discussed below.

Was a mitigation requirement plan considered as part of the adopted General Plan? If not, then the City should consider requiring mitigation at the specific project development stage. This project not only impacts Prime Farmland and Farmland of Local Importance, but also has indirect impacts on nearby Williamson Act contracts by creating development pressure in their vicinity.

The LESA report prepared by Albert A. Webb Associates concluded that this project would be considered a Significant Impact, yet no mitigations are being required for its development. The Division strongly recommends that the City review its options for agricultural mitigations to partially offset the identified impacts to agricultural land.

Response to DOC Comment 1

Page VI-3 of the City of Perris General Plan 2030 DEIR states that:

...the Environmental Impact Report prepared in conjunction with the 1991 General Plan identified conversion of agricultural land as a significant cumulative impact. Findings and facts indicating that certain social and economic factors outweighed the cumulative impacts associated with conversion of agricultural land to non-agricultural use and a Statement of Overriding Considerations were thereby adopted.

There was no mitigation requirement plan developed as part of the General Plan process and the infeasibility of mitigation at the project-specific development stage is discussed on pages 4.1-16 and 4.1-17 of the DEIR for the Rados Distribution Center. Further, the DEIR evaluated the project's potential to create development pressure in the vicinity and determined that the project would result in less than significant impacts (DEIR pages 4.1-15 – 4.1-16). No modification of the DEIR is required.

DOC Comment 2

Mitigation Measures

Although direct conversion of agricultural land is often an unavoidable impact under California Environmental Quality Act (CEQA) analysis, feasible mitigation measures must be considered.

The loss of agricultural land represents a permanent reduction in the State's agricultural land resources. As such, the Department recommends the use of permanent agricultural conservation easements on land of at least equal quality and size as partial compensation for the direct loss of agricultural land. If a Williamson Act contract is terminated, or if growth inducing or cumulative agricultural impacts are involved, the Department recommends that this ratio of conservation easements to lost agricultural land be increased. Mitigation for the loss of Prime Farmland is suggested at a 2:1 ratio due to its importance in the State of California. Conservation easements will protect a portion of those remaining land resources and lessen project impacts in accordance with CEQA Guideline §15370. The Department highlights this measure because of its acceptance and use by lead agencies as an appropriate mitigation measure under CEQA and because it follows an established rationale similar to that of wildlife habitat mitigation.

Mitigation via agricultural conservation easements can be implemented by at least two alternative approaches: the outright purchase of easements or the donation of mitigation fees to a local, regional or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural conservation easements. The conversion of agricultural land should be deemed an impact of at least regional significance. Hence the search for replacement lands may be conducted regionally or statewide, and need not be limited strictly to lands within the project's surrounding area.

The Department also has available a listing of approximately 30 "conservation tools" that have been used to conserve or mitigate project impacts on agricultural land. This compilation report may be requested from the Division at the address or phone number at the conclusion of this letter. Of course, the use of conservation easements is only one form of mitigation that should be considered. Any other feasible mitigation measures should also be considered.

Response to DOC Comment 2

A discussion of permanent conservation easements is provided on pages 4.1-16 and 4.1-17 of the DEIR, which were determined to be infeasible. Also, a reasonable range of mitigation was considered in the DEIR and none of these were deemed feasible for this project.

DOC Comment 3

Thank you for giving us the opportunity to comment on the DEIR for the Zone Change 07-0117, Development Plan Review 07-0119 and Agricultural Diminishment 07-0118 for the Rados Distribution Center. Please provide this Department with the date of any hearings for this particular action, and any staff reports pertaining to it. If you have questions regarding our comments, or require technical assistance or information on agricultural land conservation, please contact Meri Meraz, Environmental Planner, at 801 K Street, MS 18-01, Sacramento, California 95814, or by phone at (916) 445-9411.

Response to DOC Comment 3

The Department's request to be notified of project-related hearings and materials such as staff reports will be honored by the City. No new environmental issues have been raised by this comment and no modification of the DEIR is required.

**Response to
State of California, Department of Toxic Substances Control
Dated May 17, 2010**

DTSC Comment 1

- 1) The EIR should evaluate whether conditions within the project area may pose a threat to human health or the environment. Following are the databases of some of the regulatory agencies:
- **National Priorities List (NPL):** A list maintained by the United States Environmental Protection Agency (U.S.EPA).
 - **Envirostor (formerly CalSites):** A Database primarily used by the California Department of Toxic Substances Control, accessible through DTSC's website (see below).
 - **Resource Conservation and Recovery Information System (RCRIS):** A database of RCRA facilities that is maintained by U.S. EPA.
 - **Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS):** A database of CERCLA sites that is maintained by U.S.EPA.
 - **Solid Waste Information System (SWIS):** A database provided by the California Integrated Waste Management Board which consists of both open as well as closed and inactive solid waste disposal facilities and transfer stations.
 - **GeoTracker:** A List that is maintained by Regional Water Quality Control Boards.
 - **Local Counties and Cities** maintain lists for hazardous substances cleanup sites and leaking underground storage tanks.
 - **The United States Army Corps of Engineers, 911 Wilshire Boulevard, Los Angeles, California, 90017, (213) 452-3908,** maintains a list of Formerly Used Defense Sites (FUDS).

Response to DTSC Comment 1

As described on page 4.7-4 of the DEIR, a Phase I Environmental Site Assessment (ESA) has been prepared for the project site (Appendix G). As part of the Phase I ESA, an Environmental Data Resources (EDR) report was reviewed in order to identify any known or suspected

contamination sites or incidents of hazardous waste storage or disposal that might pose a threat to human health to the environment. The EDR report includes an environmental regulatory database search which reviewed all regulatory agency lists compiled pursuant to Government Code Section 65962.5, and revealed that the proposed project site is not located on a site which is included on the Cortese list of hazardous materials sites or other databases. Two mapped sites were found within one mile of the project site, but the Phase I ESA concluded that these mapped sites would not adversely impact the project site. Due to the historic agricultural uses on the project site, a Phase II ESA was conducted to assess pesticide usage (Appendix G). Based on the results of the Phase II ESA, pesticide and arsenic concentrations were well below the California Human Health Screening Levels for residential or commercial/industrial land uses and no further investigation was deemed necessary.

No new environmental issues have been raised by this comment no modification of the DEIR is required.

DTSC Comment 2

- 2) The EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may be contaminated, and the government agency to provide appropriate regulatory oversight. If necessary, DTSC would require an oversight agreement in order to review such documents.

Response to DTSC Comment 2

The Phase I and Phase II ESA's referenced in Section 4.7 (Hazards and Hazardous Materials) of the DEIR evaluated the potential for site contamination and were included in Appendix G of the DEIR. The DEIR summarized the findings contained within the Phase I ESA that concluded the project site does not appear to have been environmentally impaired due to on- or off-site sources. The Phase II ESA concluded that the subject property was not contaminated from agricultural pesticide use and no restrictions are warranted for the site and no further investigation is necessary. Therefore, no further regulatory oversight is required.

No new environmental issues have been raised by this comment no modification of the DEIR is required.

DTSC Comment 3

- 3) Any environmental investigations, sampling and/or remediation for a site should be conducted under a Workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup. The findings of any investigations, including any Phase I or II Environmental Site Assessment Investigations should be summarized in the document. All sampling results in which hazardous substances were found above regulatory standards should be clearly summarized in a table. All closure, certification or remediation approval reports by regulatory agencies should be included in the EIR.

Response to DTSC Comment 3

See the Responses to DTSC Comment 1 and 2. All sampling results for hazardous substances were summarized in the DEIR and were well below the regulatory standards; therefore, no table is necessary.

No new environmental issues have been raised by this comment and due to mandatory compliance with federal, state and local regulations regarding the environmental concerns discussed in the Phase I and Phase II ESA's (Appendix G of the DEIR), no modification of the DEIR is required.

DTSC Comment 4

- 5) If buildings, other structures, asphalt or concrete-paved surface areas are being planned to be demolished, an investigation should also be conducted for the presence of other hazardous chemicals, mercury, and asbestos containing materials (ACMs). If other hazardous chemicals, lead-based paints (LPB) or products, mercury or ACMs are identified, proper precautions should be taken during demolition activities. Additionally, the contaminants should be remediated in compliance with California environmental regulations and policies.

Response to DTSC Comment 4

The project site is currently undeveloped, has historically been used for agricultural uses (p. 4-7-1 of the DEIR) and only contains one 12.5-foot wide by 8-foot deep by 12.5-foot tall concrete structure located within the southwest portion of the site. This structure is not likely to contain any hazardous chemicals. In the unlikely event that hazardous chemicals are encountered during demolition of this concrete structure, all appropriate measures shall be followed in compliance with local, state, and federal regulations and policies.

No new environmental issues have been raised by this comment and no modification of the DEIR is required.

DTSC Comment 5

- 6) Future project construction may require soil excavation or filling in certain areas. Sampling may be required. If soil is contaminated, it must be properly disposed and not simply placed in another location onsite. Land Disposal Restrictions (LDRs) may be applicable to such soils. Also, if the project proposes to import soil to backfill the areas excavated, sampling should be conducted to ensure that the imported soil is free of contamination.

Response to DTSC Comment 5

See the Responses to DTSC Comments 1 through 3. No contaminated soils are expected on the project site. Additionally, a number of federal, state, and local laws have been enacted to regulate the management of hazardous materials. Implementation of these laws and management of hazardous materials are regulated independently of the CEQA process through programs administered by various agencies at the federal, state, and local levels. No new environmental issues have been raised by this comment and no modification of the DEIR is required.

DTSC Comment 6

- 7) Human health and the environment of sensitive receptors should be protected during any construction or demolition activities. If necessary, a health risk assessment overseen and approved by the appropriate government agency should be conducted by a qualified health risk assessor to determine if there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment.

Response to DTSC Comment 6

See the Responses to DTSC Comments 1 through 4. No contaminated soils are expected on the project site. Demolition of the concrete structure is not likely to contain any hazardous chemicals. In the unlikely event that hazardous chemicals are encountered during demolition of this concrete structure or any other phase of construction, all appropriate measures shall be followed in compliance with local, state, and federal regulations and policies.

The project proposes a warehouse/distribution facility. The project as proposed is not expected to result in any releases of hazardous materials from non-vehicular sources or handle hazardous or acutely hazardous materials, substances, or waste that may pose a risk to human health or the environment. Emissions from diesel-fueled trucks were evaluated in a Health Risk Assessment (DEIR, Appendix C) and the results are discussed in the Air Quality section (Section 4.3) of the DEIR that show the proposed project will not expose sensitive receptors to significant amounts of diesel particulate matter. No new environmental issues have been raised by this comment and no further analysis is warranted.

DTSC Comment 7

- 8) If it is determined that hazardous wastes are, or will be, generated by the proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5). If it is determined that hazardous wastes will be generated, the facility should also obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942. Certain hazardous waste treatment processes or hazardous materials, handling, storage or uses may require authorization from the local Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA.

Response to DTSC Comment 7

See the Response to DTSC Comment 6. The project as proposed is not expected to result in any releases of hazardous waste that may pose a risk to human health or the environment. Additionally, should any future uses within the proposed project generate hazardous waste; such hazardous waste will be handled and disposed of in accordance with all appropriate state and federal laws. No new environmental issues have been raised by this comment; thus, no further analysis is warranted and no modification of the DEIR is required.

DTSC Comment 8

- 9) If the project area was used for agricultural, livestock or related activities, onsite soils and groundwater might contain pesticides, agricultural chemical, organic waste or other related residue. Proper investigation, and remedial actions, if necessary, should be conducted under the oversight of and approved by a government agency in the project area prior to construction of the project.

Response to DTSC Comment 8

See the Response to DTSC Comment 1. Due to the historic agricultural uses on the project site, a Phase II ESA was conducted to assess pesticide usage (Appendix G). Based on the results of the Phase II ESA, pesticide and arsenic concentrations were well below the California Human Health Screening Levels for residential or commercial/industrial land uses and no further investigation was deemed necessary.

No new environmental issues have been raised by this comment no modification of the DEIR is required.

**Response to
State of California, Governor's Office of Planning and Research,
State Clearinghouse and Planning Unit
Dated May 17, 2010**

SCH Comment 1

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on May 12, 2010, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Response to SCH Comment 1

The comment letter which was enclosed with this OPR letter, Native American Heritage Commission, May 5, 2010, was received by the City of Perris and is included as part of this project's CEQA process in Section 2.0 of this FEIR.

The State Clearinghouse acknowledges that the City has complied with the DEIR review requirements pursuant to CEQA for this project. No further response is necessary.

**Response to
State of California, Native American Heritage Commission
Dated May 5, 2010**

NAHC Comment 1

The Native American Heritage Commission (NAHC) is the state 'trustee agency' pursuant to Public Resources Code §21070 for the protection and preservation of California's Native American Cultural Resources.. (Also see *Environmental Protection Information Center v. Johnson* (1985) 170 Cal App. 3rd 604). The California Environmental Quality Act (CEQA - CA Public Resources Code §21000-21177, amended in 2009) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the California Code of Regulations §15064.5(b)(c)(f) CEQA guidelines). Section 15382 of the CEQA Guidelines defines a significant impact on the environment as "a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE)', and if so, to mitigate that effect. To adequately assess the project-related impacts on historical resources, the Commission recommends the following.

The Native American Heritage Commission did perform a Sacred Lands File (SLF) search in the NAHC SLF Inventory, established by the Legislature pursuant to Public Resources Code §5097.94(a) and Native American Cultural resources were not identified within the APE, as previously described. Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries once a project is underway. Enclosed are the names of the nearest tribes and interested Native American individuals that the NAHC recommends as 'consulting parties,' for this purpose, that may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We recommend that you contact persons on the attached list of Native American contacts. A Native American Tribe or Tribal Elder may be the only source of information about a cultural resource.. Also, the NAHC recommends that a Native American Monitor or Native American culturally knowledgeable person be employed whenever a professional archaeologist is employed during the 'Initial Study' and in other phases of the environmental planning processes.. Furthermore we suggest that you contact the California Historic Resources Information System (CHRIS) at the Office of Historic Preservation (OHP) Coordinator's office (at (916) 653-7278, for referral to the nearest OHP Information Center of which there are 11.

Response to NAHC Comment 1

A records search was requested by CRM Tech during the preparation of the *Historical/Archaeological Resources Survey Report* for the proposed project dated January 5, 2010 (Cultural Report). The results of the records search and the field survey are presented in the Cultural Report, Appendix E of the DEIR, and within Section 4.5 of the DEIR. The results of the records search revealed 10 historical/archaeological sites within one mile of the proposed project site; however, none were on or adjacent to the project site and none were prehistoric – i.e.,

Native American – in nature. No previously unrecorded cultural resources were discovered during the field survey.

This comment does not raise any new environmental issue not already addressed in the DEIR.

NAHC Comment 2

Consultation with tribes and interested Native American tribes and interested Native American individuals, as consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA (42 U.S.C. 4321-43351) and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 [f]) *et seq.*, 36 CFR Part 800.3, the President's Council on Environmental Quality (CSQ; 42 U.S.C. 4371 *et seq.*) and NAGPRA (25 U.S.C. 3001-3013), as appropriate. The 1992 *Secretary of the Interior's Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including *cultural landscapes*.

Response to NAHC Comment 2

There is no federal approval or nexus associated with this proposed project that would require consultation pursuant to the National Environmental Policy Act (NEPA).

This comment does not raise any new environmental issue not already addressed in the DEIR.

NAHC Comment 3

Lead agencies should consider avoidance, as defined in Section 15370 of the California Environmental Quality Act (CEQA) when significant cultural resources could be affected by a project. Also, Public Resources Code Section 5097.98 and Health & Safety Code Section 7050.5 provide for provisions for accidentally discovered archeological resources during construction and mandate the processes to be followed in the event of an accidental discovery of any human remains in a project location other than a 'dedicated cemetery. Discussion of these should be included in your environmental documents, as appropriate.

Response to NAHC Comment 3

As discussed in the Section 4.5 of the DEIR, the potential for significant cultural resources existing on the site are low. Nevertheless, mitigation measures were implemented should project construction inadvertently uncover unknown buried cultural resources. During project-related excavations, mitigation measure **MM Cultural 1**, listed below, will ensure the project's potential to cause substantial adverse change in the significance of an archaeological resource as defined in section 15064.5 of the CEQA Guidelines are mitigated to a less than significant level. As stated in **MM Cultural 1**, discovered Native American resources shall be either reburied at the project site or curated at an accredited facility approved by the City of Perris.

MM Cultural 1: Prior to grading of the project site, the project developer shall hire a qualified archaeologist to provide cultural resource monitoring services at the project site. Selection of the archaeologist shall be subject to the approval of the City of Perris Planning Manager and no grading activities shall occur at the site until the archaeologist has been approved by the City. During grading activities, the archaeologist shall monitor earthmoving activities at the project site consistent with Public Resources Code Section 21083.2(b), (c), and (d). The archaeologist shall be equipped to record and salvage cultural resources that may be unearthed during grading activities. The archaeologist shall be empowered to temporarily halt or divert grading equipment to allow recording and removal of the unearthed resources. If the archaeologist identifies resources of a prehistoric or Native American origin, a Native American observer shall be added to the monitoring program and accompany the archaeologist for the duration of the grading phase. Any Native American resources shall be evaluated in accordance with the CEQA Guidelines and either reburied at the project site or curated at an accredited facility approved by the City of Perris. Once grading activities have ceased or the archaeologist determines that monitoring is no longer necessary, monitoring activities can be discontinued.

Mitigation measure **MM Cultural 3** reduces the impacts associated with the potential discovering of human remains during construction activities in accordance with existing state law.

This comment does not raise any new environmental issue not already addressed in the DEIR.

NAHC Comment 4

The authority for the SLF record search of the NAHC Sacred Lands Inventory, established by the California Legislature, is California Public Resources Code §5097.94(a) and is exempt from the CA Public Records Act (c.f. California Government Code §6254.10). The results of the SLF search are confidential. However, Native Americans on the attached contact list are not prohibited from and may wish to reveal the nature of identified cultural resources/historic properties. Confidentiality of "historic properties of religious and cultural significance" may also be protected under Section 304 of the NHPA or at the Secretary of the Interior's discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C. 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APE and possibly threatened by proposed project activity.

Response to NAHC Comment 4

Comment noted. No new environmental issues have been raised by this comment and no modification of the DEIR is required.

NAHC Comment 5

CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens. Although tribal consultation under the California Environmental Quality Act (CEQA; CA Public Resources Code Section 21000 – 21177) is 'advisory' rather than mandated, the NAHC does request 'lead agencies' to work with tribes and interested Native American individuals as 'consulting parties,' on the list provided by the NAHC in order that cultural resources will be protected. However, the 2006 SB 1059 the state enabling legislation to the Federal Energy Policy Act of 2005, does mandate tribal consultation for the 'electric transmission corridors. This is codified in the California Public Resources Code, Chapter 4.3, and §25330 to Division 15, requires consultation with California Native American tribes, and identifies both federally recognized and non-federally recognized on a list maintained by the NAHC

Response to NAHC Comment 5

Comment noted. This project is not subject to SB 1059 since it does not require a general plan amendment. No new environmental issues have been raised by this comment and no modification of the DEIR is required.

NAHC Comment 6

Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the California Code of Regulations (CEQA Guidelines) mandate procedures to be followed, including that construction or excavation be stopped in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery until the county coroner or medical examiner can determine whether the remains are those of a Native American. . Note that §7052 of the Health & Safety Code states that disturbance of Native American cemeteries is a felony.

Response to NAHC Comment 6

The requirements of the applicable provisions of the Health and Safety Code and the Public Resources Code relative to the accidental discovery of human remains are discussed on pages 4.5-8 and 4.5-14 of the DEIR. The process to be followed in the event of an accidental discovery of human remains is set forth in existing laws and regulations, which will be adhered to by the City and have been incorporated into mitigation measure **MM Cultural 3**. No new environmental issues have been raised by this comment and no modification of the DEIR is required.

NAHC Comment 7

Again, Lead agencies should consider avoidance, as defined in §15370 of the California Code of Regulations (CEQA Guidelines), when significant cultural resources are discovered during the course of project planning and implementation

Response to NAHC Comment 7

Comment noted. Mitigation measure **MM Cultural 1** provides for reburial or curation of unknown Native American resources discovered during grading. No new environmental issues have been raised by this comment and no modification of the DEIR is required.

RESPONSE TO COMMENTS
REGIONAL AND LOCAL AGENCIES

**Response to
Riverside County Transportation Commission (RCTC)
Dated May 6, 2010**

RCTC Comment 1

The RCTC, the California Department of Transportation, and the Federal Highway Administration propose to improve west-east transportation in western Riverside County by constructing a new freeway, known as the MCP. In November 2004 and July 2007, RCTC circulated a Notice of Preparation and Supplemental Notice of Preparation, respectively, for the MCP project. Additionally, in October 2008, RCTC circulated a Draft EIR/Environmental Impact Statement (EIS) for two No-Build and five Build alternatives with design variations for a 32 mile freeway through the cities of Corona, Perris, and San Jacinto. Subsequently after public review of the Draft EIR/EIS, in response to public concern and the need to focus transportation funding where the need is the greatest for regional transportation, the RCTC Board formally took action to refocus the MCP project limits between I-215 and SR-79 through the cities of Perris and San Jacinto. While the RCTC board modified the project limits for the MCP project, the alignments for the Build Alternatives east of I-215 will generally be the same. Therefore, the effects of the MCP Build Alternatives (Alternatives 4, 5, and 9) east of I-215, should be considered in the Rados Draft EIR.

CEQA requires that a reasonable analysis of the significant cumulative impacts of a proposed project be prepared (Public Resources code Section 21083(b); State CEQA Guidelines Section 15064(h)). While the Rados Distribution Center Draft EIR includes a "list" approach to the cumulative projects analysis, the proposed MCP project is not identified as a cumulative project. The MCP project should be identified and discussed in the discussion of cumulative impacts that considers "past, recent, and probable future projects producing related or cumulative impacts, including, if necessary those projects outside the control of the agency..." (CEQA Guidelines Section 15130 (b) (1)(A)). The Rados Distribution Center Draft EIR should consider the cumulative impacts associated with MCP Build Alternatives 4, 5, and 9 east of I-215.

The CEQA Guidelines [(Section 15130(b)(5))] also state that "a reasonable analysis of the cumulative impacts of the relevant project" be included, and that the EIR "shall examine reasonable, feasible options for mitigating or avoiding the project contribution to any significant cumulative effects." Inasmuch as the cumulative analysis in the Rados Draft EIR excludes the MCP project as a reasonably foreseeable project, an adequate analysis of potential significant cumulative effects has not been provided and the opportunity to identify mitigation or alternatives that would avoid or reduce significant impacts has not been explored. RCTC urges the City to diligently consider and include an analysis of cumulative environmental effects that incorporates the MCP project.

Response to RCTC Comment 1

RCTC's review of the DEIR and its concerns in regard to project development, are acknowledged. RCTC's concerns regarding the project and its relation to the proposed Mid County Parkway (MCP) project are acknowledged and further discussed below.

The discussions in this response are divided into two parts. The first part describes potential cumulative impacts associated with the proposed project, the MCP Locally Preferred Alternative 9, and MCP Build Alternative 4. These alternatives would not directly impact the proposed project site. The second part describes the potential cumulative impacts associated with the proposed project, MCP Build Alternatives 5 and 9 with the Rider Street Design Variation (DV). The proposed alignments for these two alternatives bisect the project site.

It should also be noted that the Draft EIR/EIS (Environmental Impact Statement) for the MCP project includes the proposed project in its evaluation of cumulative impacts. This is shown in Figure 3.25.1, Sheet 3 of 4 on page 3.25-17 of the MCP Draft EIR/EIS. As such, the discussions in this response incorporate information from the MCP Draft EIR/EIS.

1. Locally Preferred Alternative 9 and MCP Build Alternative 4

The alignment for Locally Preferred Alternative 9 is proposed to be located south of the project site along Placentia Avenue. The alignment within the City of Perris for MCP Build Alternative 4 is proposed to be located north of the project site and largely north of Ramona Expressway. As such, these two alternatives do not physically impact the project site.

- **Cumulative Impacts Related to Agricultural Resources**
Development of the proposed project will convert both Prime Farmland and Farmland of Local Importance into non-agricultural land uses, as envisioned in the City of Perris General Plan. Agricultural impacts from the proposed project are both individually and cumulatively significant and unavoidable due to the lack of City and/or County programs that would offset agricultural resource impacts. The MCP Build Alternatives also result in conversion of existing farmland to roadway as a result of right of way acquisition and contribute to a cumulative loss of farmlands (MCP Draft EIR/EIS page 3.25-27). This is similar to any other new development project on existing agricultural lands in the City of Perris and the conclusions of the DEIR would not change with the addition of Locally Preferred Alternative 9 and MCP Build Alternative 4 to the list of related projects.
- **Cumulative Impacts Related to Airports**
Risks associated with airport hazard-related impacts are largely site specific. The local airport considered in the cumulative analysis for the Rados Distribution Center project is March Air Reserve Base (MARB). The DEIR concluded (page 5.0-7) that the potential for cumulative impacts to occur is limited due to its location, but that implementation of mitigation measures will further reduce airport-related impacts to or from MARB.

Although each MCP Build Alternative has potentially unique airport hazard-related impacts to or from MARB, it is expected that future growth will generally comply with the range of federal, state, and local statutes and regulations applicable to development near airports, and will be subject to existing and future programs of enforcement by the appropriate regulatory agencies.

This is similar to any other new development project in the City of Perris and the conclusions of the DEIR would not change with the addition of Locally Preferred Alternative 9 and MCP Build Alternative 4 to the list of related projects.

- **Cumulative Impacts Related to Air Quality**

Air Quality impacts associated with cumulative development are evaluated on a project-specific basis using the thresholds of significance recommended by the SCAQMD. The proposed project would generate daily construction-related and operational emissions that exceed applicable thresholds of significance. As such, emissions generated by the project are determined to be individually significant and cumulatively considerable in the Rados Distribution Center – Perris Project DEIR. In addition, the DEIR concludes that project greenhouse gas emissions are also considered to be cumulatively considerable. These conclusions would not change with the addition of Locally Preferred Alternative 9 and MCP Build Alternative 4 to the list of related projects.

- **Cumulative Impacts Related to Biological Resources**

The DEIR concludes (page 5.0-10) that cumulative impacts would be less than significant provided that the terms of the MSHCP are fully implemented. The proposed project will comply with the requirements of the MSHCP and thus, will not conflict with its adopted policies. Cumulative impacts to special-status species, including sensitive natural communities and raptor foraging habitat, are fully addressed within the MSHCP and are considered less than significant. The MCP Draft EIR/EIS also acknowledges the potential for the MCP Build Alternatives to affect biological resources, but that the MSHCP serves to provide mitigation for cumulative impacts to these resources. This is similar to any other new development project in the City of Perris and the conclusions of the DEIR would not change with the addition of Locally Preferred Alternative 9 and MCP Build Alternative 4 to the list of related projects.

- **Cumulative Impacts Related to Cultural Resources**

Impacts to cultural resources are generally specific to an individual project site. Although the proposed project would not impact any known cultural resources, mitigation measures are identified in the DEIR to ensure that any resources that may be discovered during project construction activities are not significantly impacted. As such, the DEIR concludes that the project's potential contribution to cumulative impacts to cultural resources is not considerable and the cumulative impacts of the project are less than significant. The MCP Draft EIR/EIS also acknowledges the potential for the MCP Build Alternatives to affect cultural resources. This is similar to any other new development project in the City of Perris and the conclusions of the DEIR would not change with the addition of Locally Preferred Alternative 9 and MCP Build Alternative 4 to the list of related projects.

- **Cumulative Impacts Related to Geology/Soils**

Geologic hazards are generally specific to an individual project site. As stated in the DEIR (page 5.0-12), cumulative impacts could occur related to an earthquake, if the magnitude of the quake and location of the fault(s) traversed the region. Impacts due to

seismic activity would be cumulative if state and local building and development codes and regulations (existing regulatory requirements) were not being implemented throughout the region. Pursuant to City and State Building Code requirements, all new development will be required to incorporate appropriate design and construction measures to guard against ground shaking hazards. Further, the project and all other projects and structures will be constructed in compliance with existing seismic safety regulations of the California Uniform Building Code and International Building Code, which requires the use of site-specific engineering and construction standards identified for each class of seismic hazard.

The City of Perris is subject to a number of potential geologic hazards that have the potential to impact future build-out of the City of Perris General Plan. These hazards, including fault rupture hazards, ground shaking, liquefaction, landslides and rockfalls, seismically-induced settlement, subsidence and collapsible soils, and soil erosion and loss of topsoil were addressed in the General Plan EIR and Section 4.6 of the DEIR. It was determined that these impacts will be reduced to below the level of significance through implementation of General Plan Implementation Measures and existing regulatory requirements.

Since all local jurisdictions in the region are subject to local, state and federal laws, cumulative impacts related to geologic and soils safety are less than significant. These conclusions would not change with the addition of Locally Preferred Alternative 9 and MCP Build Alternative 4 to the list of related projects.

- **Cumulative Impacts Related to Hazards/Hazardous Materials**

Impacts related to hazardous materials are generally site specific. Cumulatively, future growth will comply with the range of federal, state, and local statutes and regulations applicable to hazardous materials, and will be subject to existing and future programs of enforcement by the appropriate regulatory agencies. These conclusions would not change with the addition of Locally Preferred Alternative 9 and MCP Build Alternative 4 to the list of related projects.

- **Cumulative Impacts Related to Hydrology/Water Quality**

Both the DEIR for the Rados Distribution Center – Perris Project (page 5.0-12 through 5.0-15) and the MCP Draft EIR/EIS (page 3.25-5) conclude that the water quality impacts of the two projects would not be significant and that they would not cause significant cumulative impacts. As such, the conclusions of the DEIR would not change with the addition of Locally Preferred Alternative 9 and MCP Build Alternative 4 to the list of related projects.

- **Cumulative Impacts Related to Land Use/Planning**

The MCP Draft EIR/EIS states (page 3.25-4) that it is anticipated that future developments will be implemented in a manner that is consistent with adopted land use and resource plans, and that the local agency general plans will be amended to reflect the approved MCP route alignment and facility type. The proposed project is consistent with the existing land use designations of the City of Perris General Plan Land Use

Map. In addition, the DEIR for the project concludes (page 5.0-15) that the project's potential contribution to cumulative land use impacts is not considerable, and therefore not significant. This conclusion would not change with the addition of Locally Preferred Alternative 9 and MCP Build Alternative 4 to the list of related projects.

- **Cumulative Impacts Related to Noise**

Construction activities at the proposed project site would not affect existing sensitive receptor locations in the immediate vicinity due to the distance. Construction activities associated with the MCP project would occur after the proposed project, would be much more intensive and would affect different sensitive receptors. As such, cumulative construction-related noise impacts would not occur at the same receptor locations with these two projects.

The DEIR for the project identifies (page 5.0-16) future roadway noise levels in the vicinity of the project site associated with future development. The impact of the increased noise levels is not considered to be significant. The MCP project would not increase roadway volumes on these same roadways and the conclusion of the DEIR would not change with the addition of Locally Preferred Alternative 9 and MCP Build Alternative 4 to the list of related projects.

- **Cumulative Impacts Related to Solid Waste**

The DEIR for the Rados Distribution Center – Perris Project concludes (page 5.0-16) that sufficient landfill capacity exists to accommodate future disposal needs in the County through 2040. Consequently, cumulative impacts associated with solid waste within the City of Perris and the rest of the County would be considered less than significant. The conclusions of the DEIR would not change with the addition of Locally Preferred Alternative 9 and MCP Build Alternative 4 to the list of related projects.

- **Cumulative Impacts Related to Transportation/Traffic**

The DEIR for the Rados Distribution Center – Perris Project concludes (page 5.0-17) that traffic generated by the project, in combination with traffic resulting from area-wide development and related projects will result in significant impacts to Level of Service (LOS) standards for the study intersections. The cumulative impacts would be mitigated through fee payments as required pursuant to the Western Riverside County TUMF Program and the City of Perris Road and Bridge Benefit District Fees. The collected fees will be allocated for the construction of area-wide roadway and signalization improvements.

The discussion of cumulative traffic and transportation impacts (page 3.25-5) of the MCP Draft EIR/EIS states that the MCP project would not result in any adverse effects to traffic circulation in the MCP study area, except for short-term effects during construction. The proposed Rados Distribution Center – Perris Project would be constructed before the MCP project; therefore, there would be no cumulative traffic impacts associated with construction activities at the same time for these two projects.

As to operational activities, the MCP Draft EIR/EIS states that the MCP project would have a beneficial effect by improving regional and local mobility. Based on this information, no unavoidably significant cumulative impacts to traffic and circulation are anticipated in Perris as a result of the proposed project along with other developments and the MCP project.

- **Cumulative Impacts Related to Water and Sewer**

The Eastern Municipal Water District (EMWD) has determined that adequate water and sewer service and supplies are available to serve the proposed project in the near and long term along with current and future uses within the EMWD's service boundary (DEIR page 5.0-18). The conclusions of the DEIR would not change with the addition of Locally Preferred Alternative 9 and MCP Build Alternative 4 to the list of related projects.

2. MCP Build Alternatives 5 and 9 Rider Street DV

The alignment within the City of Perris for MCP Build Alternatives 5 and 9 Rider Street DV is proposed to bisect the Rados Distribution Center project site. As such, these two alternatives would directly and physically impact the proposed project and site. Since the Project applicant is currently seeking approval of the proposed project and the RCTC is still evaluating which MCP alternative to approve, it is assumed that the proposed Rados Distribution Center project would be constructed and operational prior to construction of the approved MCP alignment. This is consistent with the MCP Draft EIR/EIS, which identifies the project as a cumulative project. The MCP Draft EIR/EIS acknowledges (pages 3.25-28 and 3.25-29) that the MCP Build Alternatives would result in the acquisition of nonresidential, residential, and municipal properties. RCTC would be required to acquire the entire project parcel under any of these build alternatives. The entire project building and any infrastructure on the site would then be demolished to make way for the new MCP segment. As such, the Rados Distribution Center project and MCP Build Alternatives 5 and 9 Rider Street DV would not generate cumulative (combined) impacts since both projects cannot occur at the same time. In the cases where surface or subsurface resources would be affected by the Rados project (e.g., agricultural resources, biological resources), the impact will have occurred before the MCP segment is built and no further impact would occur. In other cases, the on-going operational impacts of the Rados project would no longer occur once the MCP segment is built (e.g., air quality, noise, traffic, water supply). Any actual cumulative impacts associated with these MCP alternatives have been evaluated in the MCP Draft EIR/EIS and no further evaluation of cumulative impacts is required for the Rados Distribution Center EIR.

RCTC Comment 2

Lastly, while the proposed Rados Distribution Center would not be directly impacted by the proposed MCP Alternatives 4 and 9 east of I-215, Alternative 5, if selected, would bisect the project site and directly impact the proposed Rados Distribution Center project site. The RCTC Board has not selected a Preferred Alternative for the modified project limits. Relevant information, including the Draft EIR/EIS for the MCP project, is available online at www.midcountyparkway.org. RCTC is currently revising and updating technical studies with the new project limits for the MCP project and plans to circulate a Recirculated Draft EIR/Supplemental Draft EIS in 2011.

Response to RCTC Comment 2

The City appreciates RCTC's willingness to participate in further discussion of project-related comments and concerns. However, the City is unwilling to place this project, which is consistent with the current land use designations for the project site, on indefinite hold while RCTC evaluates the various alternatives for the MCP project. The project applicant understands the site is under consideration for an MCP project segment, but also understands that he would be adequately compensated should RCTC need to acquire the project site.

**Response to
Riverside Transit Agency (RTA)
Dated April 19, 2010**

RTA Comment 1

Although RTA does not currently have transit service to this site, given the scope of the project and the planned inclusions in it, we recommend that possible future public transportation should be an element included as the project progresses. This would include identifying potential bus stops, possible inclusion of bus stop amenities (e.g. shelters, benches) and assuring the streets are constructed to accommodate buses should bus service be added. Please also note that public transit can serve as a mitigation measure to decrease vehicle traffic.

Response to RTA Comment 1

The City has considered possible transit options in relation to the proposed project and has included streets improvements that are wide enough to accommodate buses if bus service is added. The DEIR discussed public transit within Section 4.12, Transportation/Traffic. Specifically, page 4.12-17 states:

The proposed project is an industrial warehouse project which will consist of a building used to store and house goods during their local and regional distribution. The Riverside Transit Authority (RTA) operates Routes 19 (Moreno Valley Mall to Perris) and 41 (Mead Valley Community Center to RCRMC) within vicinity of the project site. Route 19 travels north and south along Perris Boulevard with “alternate routing” along Ramona Expressway, Webster Avenue, Morgan Street and Indian Avenue. Route 41 travels east and west along Cajalco/Ramona Expressway with routing along Webster Avenue, Morgan Street and Indian Avenue. Employees of the proposed project will be able to utilize these RTA routes as a means of alternate modes of transportation to and from work.

The City of Perris General Plan identifies alternate modes of transportation as being bus, rail or pedestrian. Specifically, Policy I.B.1 states: “require on-site improvements that accommodate public transit vehicles (i.e., bus pullouts, transit stops, cueing lanes, bus turnarounds and other improvements) at major trip attractions (i.e., community centers, tourist and employment centers).” The project will include roadway improvements which include sidewalks and bike racks, and is located near existing bus routes. The project will not conflict with the City’s adopted policies, plans or programs supporting alternative modes of transportation, and therefore potential impacts are considered **less than significant**.

In addition to the bus service described above, a transfer stop is located on Morgan Street which is approximately 1/3 mile north of the project site. Therefore, the project site has adequate access to public transit and no mitigation is necessary. No new environmental issues have been raised by this comment and no modification of the DEIR is required.

**Response to
South Coast Air Quality Management District (SCAQMD)
Dated May 11, 2010**

SCAQMD Comment 1

Truck Trip Rates

AQMD staff is concerned that the air quality impacts reported in the Draft EIR may be underestimated. Specifically, the lead agency states in Table 4.12-G that there will be no more than 384 heavy duty truck trips per day at this facility. This equates to 192 trucks visiting the facility per day. This low number of truck trips is surprising given the large number of proposed loading docks (254 docks) and truck parking stalls (353) [App. C, page 1]. Based on these figures, over two-thirds of the loading docks and truck parking stalls will remain idle from heavy duty truck activity on a daily basis [$192 / (254 + 353) = 0.32$]. Based on information presented in the Draft EIR, this presumed level of inactivity does not seem reasonable for a project designed to serve as a major distribution center serving regional interests.

The lead agency uses this low truck trip rate in the Draft EIR to determine that operational air quality impacts will not expose sensitive receptors to significant pollutant concentrations, including a nearby school. AQMD staff therefore recommends that further justification be presented in the Final EIR for the minimal truck use projected at this distribution center. If the lead agency determines that additional trucks may use this facility, impacts from this increased use should be presented in either a Recirculated Draft EIR or the Final EIR. If the lead agency determines that the truck trip rate specified in the Draft EIR is appropriate, enforceable conditions should be placed in the Final EIR that limit the number of heavy duty trucks visiting the facility to 192 per day or less.

Response to SCAQMD Comment 1

The City estimated the trip generation rates based upon the *San Bernardino/Riverside County Warehouse/Distribution Center Vehicle Trip Generation Study* prepared by the National Association of Industrial and Office Properties (NAIOP) in January 2005. It is important to note that the 192 trucks quoted in the comment above only represents the estimated 4+ axle trucks. There would be another approximately 124 round trips per day by large 2 and 3 axle trucks for a total of 318 round trips per day for trucks utilizing the project's 254 proposed loading bays. Therefore, a reasonable level of activity was estimated in the DEIR.

Operational impacts of criteria pollutants were found to be significant in the DEIR. The Health Risk Assessment (HRA) determined that the project's maximum increase in excess cancer risk to sensitive receptors was 2.1 in one million which is substantially lower than the 10 in one million threshold. Even if the project's truck activity were to double, the project's increase in an excess cancer risk would still be lower than the threshold. Based on these estimates, it is not appropriate to place a limit on the daily number of heavy duty trucks visiting the facility. No new

environmental issues have been raised by this comment and no modification of the DEIR is required.

SCAQMD Comment 2

Modeling Analysis

AQMD staff is also concerned that the modeling analysis does not accurately portray project emissions. Revisions to the modeling should be included in the Recirculated Draft EIR or Final EIR based on the following:

- The LST air quality analysis presented in the Draft EIR does not account for truck travel between the proposed facility and the closest major traffic corridors. Truck travel routes may run adjacent to nearby sensitive receptors such as schools or residences. AQMD staff recommends that the lead agency clearly specify truck routes between this facility and nearby transportation corridors, and the air quality impacts from trucks traveling along these arterial roads in the Recirculated Draft EIR or Final EIR.

Response to SCAQMD Comment 2

The SCAQMD's LST guidance states that off-site mobile emissions from the project should not be included in emissions compared to LSTs (page 1-4 of the LST Methodology).

The proposed project site is located in close proximity to Perris Boulevard and Ramona Expressway, which are both designated as Truck Routes in the Circulation Element of the City of Perris General Plan. Trucks traveling to and from the project site would travel along these roadways between the project site and I-215. The air quality impacts from project-related diesel exhaust emissions from trucks traveling in the project vicinity were analyzed in the HRA. Also, the CO Hot Spots Analysis evaluated impacts from congested intersections in the project vicinity. No new environmental issues have been raised by this comment and no modification of the DEIR is required.

SCAQMD Comment 3

- Air quality modeling of facility operations in the Draft EIR uses emission rates derived from URBEMIS outputs for operational truck activity offsite as input for AERMOD emission rates for truck activity onsite. This emission rate is inappropriate for AERMOD use as it is based on trucks traveling on roadways, and does not account for truck travel or idling activities onsite. Site specific emission factors should be calculated based on assumed onsite travel distances and up to 15 minutes of idling activity per truck visit. This emission rate should then be used in the AERMOD modeling analysis.

Response to SCAQMD Comment 3

As stated on page 24 of the Air Quality Impact Analysis (AQIA) regarding the long-term operational LST analysis:

In order to ensure that the worst-case scenario for this project was modeled, the maximum emissions for NO_x and CO from either winter or summer from **Table 4** and **Table 5** were used as the year-round emission factor for the project. These emissions, taken from URBEMIS output, represent the vehicle emissions calculated from all project-related traffic traveling on local roadways to access the project-site, i.e., total vehicle emissions and area source emissions operating on the project site. The use of these regional vehicle emissions overestimates project impacts. However, the following analysis for NO_x and CO emissions shows that the incorporation of these regional vehicle emissions still results in localized concentrations below the applicable thresholds.

As shown above, the LST analysis represents a conservative analysis by modeling the entire project's mobile source emissions (both on- and off-site) within the project boundary which would compensate for idling activities. No new environmental issues have been raised by this comment and no modification of the DEIR is required.

SCAQMD Comment 4

- For NO_x emissions, the release height of source SLINE1 varies from 14.01 feet to 7.45 feet. AQMD staff recommends that an explanation of this reduction in release height should be presented in the Final EIR, or the release height should remain constant in the final modeling analysis.

Response to SCAQMD Comment 4

The release height for SLINE 1 was inadvertently input as 2.27 meters (7.45 feet) rather than 4.27 meters (14.01 feet) for one of the nodes and has revised to reflect a consistent release height of 4.27 meters. The change in release height resulted in a slight change in the output of approximately 3 µg/m³ or less at modeled receptor locations. The revised estimates were lower in comparison. The receptor locations described in the DEIR and AQIA experience very little change and are revised as follows in the FEIR. In fact, when rounding the concentrations to the nearest hundredth, the estimate shown for the nearest commercial receptor remained the same.

Long-Term Impacts – LST Analysis

The following paragraphs summarize the findings of each criteria pollutant using SCAQMD's LST methodology as contained in the AQIA in Appendix C.

NO_x

For the project area, the maximum 1-hour NO₂ concentration in the last 3 years was 0.09 ppm. The Ambient Air Quality Standard (AAQS) for NO₂ is a 1-hour maximum concentration of 0.18 ppm. Therefore, the difference in concentrations is 0.09 ppm (170

$\mu\text{g}/\text{m}^3$). Based on SCAQMD methodology, the project would be considered to have significant air quality impacts if NO_2 concentrations at the nearest sensitive receptor exceed 0.09 ppm. NO_x emissions are simulated in the air quality dispersion model and the NO_2 conversion rate is treated by a NO_2 -to- NO_x ratio, which is a function of downwind distance. According to the LST methodology developed by staff at SCAQMD, at 5,000 meters downwind, 100 percent conversion of NO_2 -to- NO_x is assumed. The nearest potential sensitive receptor is approximately 397 meters (approximately 1,300 feet) south. The NO_x concentration at this location is approximately $174.4765 \mu\text{g}/\text{m}^3$ and the NO_2 -to- NO_x ratio is approximately 0.258. Therefore, the sensitive receptor will be exposed to an NO_2 concentration of approximately $45.016 \mu\text{g}/\text{m}^3$, which is less than the threshold of $170 \mu\text{g}/\text{m}^3$. The nearest commercial receptor with the highest concentration is approximately 25 meters west. The NO_x concentration at this location is approximately $1,145.02 \mu\text{g}/\text{m}^3$ and the NO_2 -to- NO_x ratio is 0.053. Therefore, the commercial receptor will be exposed to an NO_2 concentration of $60.69 \mu\text{g}/\text{m}^3$, which again is less than the threshold of $170 \mu\text{g}/\text{m}^3$. Therefore, project operation will not cause an exceedance of the LST for NO_2 during project operation to either sensitive or commercial receptors.

No new environmental issues have been raised by this comment not already addressed in the DEIR, and the impact of the proposed project from the long-term LST analysis continues to be less than significant.

SCAQMD Comment 5

- In the Health Risk Assessment (HRA) Diesel Particulate Matter (DPM) modeling file, 10 of the 19 roadway line sources modeled have emission rates of zero grams per second (SLINE 1, 2, 3, 4, 5, 6, 8, 9, 10, 15). AQMD staff recommends that the lead agency revise the analysis to include these roadway segments in the HRA, especially those near sensitive receptors.

Response to SCAQMD Comment 5

The project-specific truck traffic modeled in the Traffic Study (Appendix J of the DEIR) did not predict truck travel along those select roadway segments as also depicted in Appendix B of the HRA. The roadway segments listed above were utilized in the HRA to show existing and cumulative truck traffic DPM.

No new environmental issues have been raised by this comment and no modification of the DEIR is required.

SCAQMD Comment 6

Mitigation Measures

Lastly, given the project's potential exposure of sensitive receptors surrounding the project site to diesel emissions, AQMD staff recommends that the lead agency consult the Western Riverside Council of Governments *Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities*.¹ Consistent with this guidance, AQMD staff recommends adding the following mitigation measures to minimize potentially significant air quality impacts from the operational phase of the project, if feasible:

- ❖ Restrict operation to “clean” trucks, such as a 2007 or newer model year or 2010 compliant vehicle;
- ❖ Avoid siting new sensitive land uses within 1,000 feet of the warehouse/distribution center;
- ❖ Design the warehouse/distribution center such that entrances and exits discourage trucks from traversing past neighbors or other sensitive receptors;
- ❖ Develop, adopt and enforce truck routes both in an out of city and in and out of facilities;
- ❖ Have truck routes clearly marked with trailblazer signs, so trucks will not enter residential areas;
- ❖ Identify or develop secure locations outside of residential neighborhoods where truckers that live in the community can park their truck, such as a Park & Ride;
- ❖ Re-route truck traffic by adding direct off-ramps for the truck or by restricting truck traffic on certain sensitive routes;
- ❖ Require or provide incentives for particulate traps that meet CARB certified level 3 requirements;
- ❖ Electrify service equipment at facility;
- ❖ Improve traffic flow by signal synchronization; and
- ❖ Conduct air quality monitoring at sensitive receptors.

Response to SCAQMD Comment 6

The additional recommended mitigation measures have been evaluated. The feasibility and applicability of each are described below.

Regarding “clean” truck fleets, the proposed project building is speculative, to be leased and/or sold; and the specific uses and occupants are unknown at this time, as stated on page 1.0-4 of the DEIR. To impose this restriction may limit the future occupants and businesses that would use the project. The potential business or company that may occupy the site may not have any control over the trucks that visit the site if they do not have their own fleet. Therefore, the existing mitigation measure **MM Air 14** addresses this issue to the extent feasible through requiring the developer/successor-in-interest to provide building occupants with information on diesel particulate traps and “clean” fleets.

However, the mitigation measure will be modified to more closely match the language recommended by SCAQMD as follows:

MM Air 14: The project shall provide information about diesel particulate traps and alternative fueled off-road equipment to all customers. In order to promote alternative fuels, and help support “clean” truck fleets, the developer/successor-in-interest shall provide building occupants and businesses with information related to SCAQMD’s Carl Moyer Program, or other state programs that provide funding for cleaner than required heavy-duty engines and emission control devices, such as 2007 or newer model year or 2010 compliant vehicles.

The recommended measure to avoid siting new sensitive land uses within 1,000 feet of a warehouse/distribution center is not a project level mitigation. Rather, it is a policy that lead agencies should consider when new project applications are accepted. Further, no existing or planned sensitive uses exist within 1,000 feet of the project site.

As shown in the Traffic Study, the project truck traffic is anticipated to utilize the entrance on Indian Avenue, a future designated truck route identified in the City of Perris General Plan, to access the site from to and from the I-215 freeway via the Harley Knox Boulevard on- and off-ramps. This route does not traverse past sensitive receptors. Therefore the following suggested mitigation measures do not apply: design the warehouse/distribution center such that entrances and exits discourage trucks from traversing past neighbors or other sensitive receptors; develop, adopt and enforce truck routes both in and out of the city an in and out of facilities; have truck routes clearly marked with trailblazer signs, so trucks will not enter residential areas; re-route truck traffic by adding direct off-ramps for the truck or by restricting truck traffic on certain sensitive routes.

There are currently enough truck parking spaces located on-site to accommodate overnight parking. Therefore, additional secure location outside the project site is not necessary.

The recommendation to require or provide incentives for particulate traps that meet CARB certified level 3 requirements is currently addressed in **MM Air 5** for construction by and **MM Air 14** for operations.

The following mitigation measure will be added to incorporate the recommendation to electrify service equipment at the facility:

MM Air 14a: Service equipment at the facility will be either low-emission propane powered or electric (i.e., forklifts).

The City of Perris Public Works/Engineering Administration Division will ensure that signals are synchronized to ensure adequate traffic flow and a mitigation measure is not necessary.

As noted above, the project is not located near any sensitive receptors. In addition, the recommendation to conduct air quality monitoring at sensitive receptors is not appropriate at the project level, but better handled at the regional level by an appropriate air quality regulating entity and is therefore, not considered as a feasible mitigation measure for this particular project. Monitoring is already conducted nearby in the City of Perris by the SCAQMD. Air quality monitoring at receptor sites would be done after the project is operational when there would be no potential benefit to receptors and certainly wouldn't be able to substantially lessen impacts. Monitoring at sensitive receptor locations will not differentiate this project's emissions compared to the other local and regional sources in the area that contribute to pollutant concentrations in the ambient air. In addition, the HRA for this project used conservative assumptions and did not result in significant health risk impacts. Therefore, because additional monitoring should be the responsibility of the SCAQMD in cooperation with the City of Perris, it is not feasible to include this as a mitigation measure for this project.

The mitigation measure modification and addition does not address any new environmental issue not already addressed in the DEIR; the impact of the proposed project continues to be significant even with the mitigation measures recommended in the DEIR.

RESPONSE TO COMMENTS

NATIVE AMERICAN TRIBES

**Response to
Pechanga Cultural Resources, Temecula Band of Luiseño Mission Indians
Dated May 7, 2010**

Pechanga Comment 1

The Pechanga Band of Luiseño Indians, a federally recognized Indian tribe and sovereign government, (hereinafter, “the Tribe”) has received the above referenced DEIR, and submits this comment letter on the above listed Project.

The Tribe officially requests involvement in this Project pursuant to Public Resources Code §21092.2, including notification and involvement in the entire CEQA environmental review process for the duration of the above referenced Project. The Tribe further requests to be directly notified of all public hearings and scheduled approvals concerning this Project and requests that these comments be made part of the record of approval for this Project.

The Tribe submits these comments concerning the Project's potential impacts to cultural resources in conjunction with the environmental review of the Project. The Tribe reserves the right to fully participate in the environmental review process, as well as to provide further comment on the Project's impacts to cultural resources and potential mitigation for such impacts. Further, the Tribe reserves the right to participate in the regulatory process and provide comment on issues pertaining to the regulatory process and Project approval.

Response to Pechanga Comment 1

The City notes the Tribe’s request to be notified and involved in the entire CEQA process for the project. With respect to being added to the distribution list, the Tribe was included in the distribution of the Initial Study and DEIR. The Tribe’s request to be notified of public hearings and scheduled approvals for this project will be honored.

No new environmental issues have been raised by this comment and no modification of the DEIR is required.

Pechanga Comment 2

**THE CITY OF PERRIS MUST INCLUDE INVOLVEMENT OF AND CONSULTATION
WITH THE PECHANGA TRIBE IN ITS ENVIRONMENTAL REVIEW PROCESS**

It has been the intent of the Federal Government¹ and the State of California² that Indian tribes be consulted with regard to issues which impact cultural and spiritual resources, as well as other governmental concerns. The responsibility to consult with Indian tribes stems from the unique government-to-government relationship between the United States and Indian tribes. This arises when tribal interests are affected by the actions of governmental agencies and departments. In this case, it is undisputed that the project lies within the Pechanga Tribe’s traditional territory. Therefore, in order to comply with CEQA and other applicable Federal and California law, it is imperative that the City of Perris consult with the Tribe in order to guarantee adequate knowledge to appropriately evaluate the project effects, as well as generating adequate mitigation measures.

Response to Pechanga Comment 2

There is no federal nexus that would require consultation pursuant to the federal documents referenced in the comment. The proposed project does not meet the requirements of Senate Bill (SB) 18 with respect to government to government consultation. SB 18 is applicable to general plan or specific plan amendments, new general plans, and specific plans. The proposed project does not entail amendment of the City's General Plan; thus, the provisions of SB 18 are not applicable to the project. The City has, however, included the Tribe in the review process by providing the Notice of Preparation, the DEIR, and responses to comments received on the DEIR and the City will also provide notices of upcoming public hearings on the project. No other consultative efforts are required by law for this type of project. The comment did not raise any new environmental issue not already addressed in the DEIR.

Pechanga Comment 3

PECHANGA CULTURAL AFFILIATION TO THE PROJECT AREA

The Pechanga Tribe asserts that the Project area is part of the Tribe's aboriginal territory, as evidenced by the existence of Luiseño place names, rock art, pictographs, petroglyphs, a village complex (*Qaxáalku*) and an extensive Luiseño artifact record in the vicinity of the Project. The Tribe further asserts that this culturally sensitive area is affiliated specifically with the Pechanga Band of Luiseño Indians because of the Tribe's specific cultural ties to this area. The Tribe considers any resources located on this Project property to be Pechanga cultural resources.

D. L. True, C. W. Meighan, and Harvey Crew³ stated that the California archaeologist is blessed "with the fact that the nineteenth-century Indians of the state were direct descendents of many of the Indians recovered archaeologically, living lives not unlike those of their ancestors." Similarly, the Tribe knows that their ancestors lived on this land and that the Luiseño peoples still live in their traditional lands. The Tribe's knowledge of our ancestral boundaries is based on reliable information passed down to us from our elders; published academic works in the areas of anthropology, history and ethno-history; and through recorded ethnographic and linguistic accounts. Many anthropologists and historians who have presented boundaries of the Luiseño traditional territory have included the Project area in their descriptions (Drucker 1937; Heiser and Whipple 1957; Kroeber 1925; Smith and Freers 1994), and such territory descriptions correspond with what was communicated to the Pechanga people by our elders. While we agree that anthropological and linguistic theories as well as historic accounts are important in determining traditional Luiseño territory, the most critical sources of information used to define our traditional territories are our songs, creation accounts and oral traditions.

Luiŝeño history originates with the creation of all things at '*éxva Teméeku*, the present day City of Temecula, and dispersing out to all corners of creation (what is today known as Luiŝeño territory). It was at Temecula that the Luiŝeño deity *Wuyóot* lived and taught the people, and here that he became sick, finally expiring at Lake Elsinore. Many of our songs relate the tale of the people taking the dying *Wuyóot* to the many hot springs at Elsinore, where he died (DuBois 1908). He was cremated at '*éxva Teméeku*. It is the Luiŝeño creation account that connects Elsinore to Temecula, and thus to the Temecula people who were evicted and moved to the Pechanga Reservation, and now known as the Pechanga Band of Luiŝeño Mission Indians (the Pechanga Tribe). From Elsinore, the people spread out, establishing villages and marking their territories. The first people also became the mountains, plants, animals and heavenly bodies.

Many traditions and stories are passed from generation to generation by songs. One of the Luiŝeño songs recounts the travels of the people to Elsinore after a great flood (DuBois 1908). From here, they again spread out to the north, south, east and west. Three songs, called *Monívol*, are songs of the places and landmarks that were destinations of the Luiŝeño ancestors, several of which are located near the Project area. They describe the exact route of the Temecula (Pechanga) people and the landmarks made by each to claim title to places in their migrations (DuBois 1908:110). In addition, Pechanga elders state that the Temecula/Pechanga people had usage/gathering rights to an area extending from Rawson Canyon on the east, over to Lake Mathews on the northwest, down Temescal Canyon to Temecula, eastward to Aguanga, and then along the crest of the Cahuilla range back to Rawson Canyon. The Project area is located within the central area of this culturally affiliated territory. The Native American Heritage Commission (NAHC) Most Likely Descendent (MLD) files substantiate this habitation and migration record from oral tradition. These examples illustrate a direct correlation between the oral tradition and the physical place; proving the importance of songs and stories as a valid source of information outside of the published anthropological data.

Tóota yixélval (rock art) is also an important element in the determination of Luiŝeño territorial boundaries. *Tóota yixélval* can consist of petroglyphs (incised) elements, or pictographs (painted) elements. The science of archaeology tells us that places can be described through these elements. Riverside and Northern San Diego Counties are home to red-pigmented pictograph panels. Archaeologists have adopted the name for these pictograph-versions, as defined by Ken Hedges of the Museum of Man, as the San Luis Rey style. The San Luis Rey style incorporates elements which include chevrons, zig-zags, dot patterns, sunbursts, handprints, net/chain, anthropomorphic (human-like) and zoomorphic (animal-like) designs. Tribal historians and photographs inform us that some design elements are reminiscent of Luiŝeño ground paintings. A few of these design elements, particularly the flower motifs, the net/chain and zig-zags, were sometimes depicted in Luiŝeño basket designs and can be observed in remaining baskets and textiles today.

An additional type of *tóota yixélval*, identified by archaeologists also as rock art or petroglyphs, are cupules. Throughout Luiŝeño territory, there are certain types of large boulders, taking the shape of mushrooms or waves, which contain numerous small pecked and ground indentations, or cupules. Many of these cupule boulders have been identified within a few miles of the Project. Additionally, according to historian Constance DuBois:

When the people scattered from Ekvo Temeko, Temecula, they were very powerful. When they got to a place, they would sing a song to make water come there, and would call that place theirs; or they would scoop out a hollow in a rock with their hands to have that for their mark as a claim upon the land. The different parties of people had their own marks. For instance, Albañas's ancestors had theirs, and Lucario's people had theirs, and their own songs of Munival to tell how they traveled from Temecula, of the spots where they stopped and about the different places they claimed (1908:158).

This Project property is located approximately one mile to the east of one of the densest Luiseño village complexes known as *Qaxáalku*. The etymology of the Spanish word Cajalco derives from the Luiseño word for "place of quail." The suffix "ku" is considered a more archaic form of the suffix "anga," which means place of (as in Pechanga...place of dripping water). Throughout the region containing *Qaxáalku* there are still quail but almost as important are the *kukúulam*, or burrowing owl, that once lived there in large numbers. The areas separated by low-lying bedrock boulders provide an ideal habitat for the owls. J.P. Harrington's/Pechanga informant Celestine Ahuayo relates: "*the (that type of) area was known as kukúulam pomkí, which means where the ground owl houses.*" *Kukúul*/burrowing owl is important for the Luiseño because of his status in our Creation Story. Father Boscana wrote of the burrowing owl's role in the Story: '*It was determined by (the lower animals) that Father Wuyóot should received his death by means of poison. Kukúulmal (the small burrowing owl) perceived this and immediately gave the information to Wuyóot.*' Eventually, *Wuyóot* did succumb to poison but the burrowing owl gained a distinction in our Luiseño songs as a good messenger. The *Payómkawichum* (Luiseño people) would have revered the area where this "good apostle" lived by living there as well.

Within the *Qaxáalku* complex, there are at least seven (7) recorded cupule boulders and many others with painted markings (pictographs). Additionally, beyond the numerous bedrock mortars and slicks, are four (4) ancestral quartz quarries. Quartz points were important to the *Payómkawichum* because it is taught that *Suukat* (deer), who gave his life for the starving People in our Creation Story, could only be taken by a point made of quartz.

The Project area, located on the floor of Perris Valley, is surrounded by culturally sensitive features. As stated above, to the northwest and southwest is the *Qaxáalku* complex; to the south is the San Jacinto River and to the east is Lake Perris and known sacred and ceremonial sites. Further, our oral traditions state that there were trade and transportation routes that passed through this area. In relation to documented archaeological studies, the Project is located to the immediate south of March Air Reserve Base (MARB). The Tribe has been designated as the affiliated Tribe by LSA Associates for the March Joint Powers Authority and the MARB (Schroth 1999). Our songs and stories, as well as academic works and recorded archaeological/cultural sites, demonstrate that the Luiseño people who occupied the Project area are ancestors of the present-day Pechanga Band of Luiseño Indians, and as such, Pechanga is the appropriate culturally affiliated tribe for projects that impact this geographic area.

The Tribe welcomes the opportunity to meet with the City to further explain and provide documentation concerning our specific cultural affiliation to lands associated with this Project.

Response to Pechanga Comment 3

Comment noted. The City recognizes that this area of Riverside County has been culturally affiliated with Native Americans known as the Luiseño. There are various bands of Luiseño throughout the county and the closest groups to the City of Perris are known as the Soboba (Hemet) and/or Pechanga (Temecula). Archaeologically, the area has also been associated with some Cahuilla populations originating from areas to the east of the Perris Plain. Cultural Resources in the City of Perris may be identified as either Luiseño or Cahuilla, although they are more likely to be of Luiseño origin. The City of Perris includes the Soboba Band of Luiseño Indians and the Temecula Band of Luiseño Indians in the review of environmental documents. No new environmental issues have been raised by this comment and no modification of the DEIR is required.

Pechanga Comment 4

PROJECT IMPACTS TO CULTURAL RESOURCES

To date, the Tribe has received the Archaeological Survey Report⁴ and the Draft Environmental Impact Report (DEIR). The Proposed Project is located in a highly sensitive region of Luiseño territory and the Tribe believes that the possibility for recovering subsurface resources during ground-disturbing activities is high. The Tribe does not believe that the proposed mitigation measures in the DEIR fully address the sensitivity of the Project area, nor do they adequately avoid or mitigate impacts to cultural resources. As a result, the Tribe believes that the DEIR is insufficient as drafted and must be amended to appropriately avoid and/or mitigate such impacts. Amendments to the cultural resources impacts must be done in consultation with the Pechanga Tribe, which has significant information which is unavailable to the City or its consultant.

Response to Pechanga Comment 4

The City does not agree with the Tribe's assertion that the recommended mitigation measures are inadequate. Page 4.5-12 of the DEIR states that 10 historical/archaeological sites were recorded in the project area and all 10 sites were dated to the historic period with no previously identified prehistoric (Native American) sites. The DEIR identifies three mitigation measures to address potential impacts to cultural resources that could be discovered during project development. These measures will mitigate potential impacts to a less than significant level. These mitigation measures require monitoring by a qualified archaeologist and paleontologist, reporting, and curation of any artifacts (archaeological or paleontological) collected during project grading, contacting a Native American observer if prehistoric resources are identified, and ensure proper treatment of uncovered human remains in accordance with state code.

No new environmental issues have been raised by this comment and no modification of the DEIR is required.

Pechanga Comment 5

The Tribe is also concerned with the lack of Native American consultation for this Project. No contact was made with the Native American Heritage Commission to identify whether sacred sites were located in or around the project. Nor was any consultation attempted with Native American Tribes other than general public notices. As discuss below, tribes have information that, due to sensitivity and specific tribal policies, cannot necessarily be made public and to which archaeologists are not privy. Early consultation with tribes ensures that concerns about potential projects and impacts to significant and important cultural resources are addressed in a sensitive and meaningful manner. Relying solely on the archaeological consultant for information without contacting a professional tribal consultant regarding *their* ancestors and

their history does not fulfill the spirit of consultation under CEQA nor does it acknowledge that tribes themselves know specific information about the land, its past history and uses and, more importantly, its ancestors that is vital in the planning process.

Response to Pechanga Comment 5

As noted above in the Response to Pechanga Comment 2, the proposed project does not meet the requirements of SB 18 with respect to government to government consultation. SB 18 is applicable to general plan or specific plan amendments, new general plans, and specific plans. The proposed project does not entail amendment of the City's General Plan; thus, the provisions of SB 18 are not applicable to the project and no consultation is necessary. The comment did not raise any new environmental issue not already addressed in the DEIR.

Pechanga Comment 6

The Tribe does not agree with the recommendations as provided in the archaeological study and the DEIR mitigation measures. According to these two documents, no cultural resources were identified during the field walkover. While the Tribe understands that there may not be surface cultural resources, the Project area is likely to contain subsurface cultural resources/inadvertent discoveries. The identification of surface artifacts should not be the only factor in the determination of resource impacts. As stated above, the Tribe knows the region containing the proposed Project to be culturally sensitive with potentially significant subsurface resources, which is supported by the identification within two miles of the Project two Village Complexes, San Luis Rey-style *tóota yixélval*, sacred and ceremonial areas as well as the physical location of the Project. The Tribe believes that any impacts to cultural sites within this area will be a great loss to tribal and scientific knowledge. Additionally, as stated in the archaeological study⁵, an old trail is recorded as running through the western portion of the Project. The Tribe emphasizes that historic trails generally followed existing, older, Native American trails. This further solidifies the Tribe's knowledge that this area was extensively used by their ancestors and that the potential for subsurface resources is high.

Habitation sites and Village Complexes are of utmost importance to the Tribe because they are the last physical remains of where the ancestors lived. They contain information and data that are reflective of every aspect of tribal culture. It is well known that native village and habitation complexes enveloped large areas of land, sometimes several square miles. The Tribe understands that, for various reasons, Cultural Resource Management (CRM) work is often limited to the proposed project with no resources expended for a regional analysis. However, in order to understand the full impacts of the Project on cultural resources, the adjacent resources must be taken into account from not only a scientific archaeological perspective but from a cultural one as well. The Tribe asserts that any analysis of impacts to cultural resources for this Project area must necessarily include all village complexes, even if such complexes exist adjacent to or nearby the Project area.

The Tribe has observed over the last few decades a shift in archaeological practices which looks at cultural resources on an individual scale and on a project-by-project basis. This piecemeal assessment is problematic at best and belies the fact that many of these sites comprise much larger complexes, and further results in evaluations of the sites as not being significant. As a consequence of this approach, very little regional or settlement pattern research is conducted in the Riverside County area to connect the dots and has resulted in the systematic destruction of villages and habitation areas.

The Tribe believes that division of sites and features into separate sites necessarily takes away from the significance of the sites themselves because they are analyzed by only looking at the particulars of that site/feature while missing the relationship to the other sites/features in the vicinity as well as the topography, geography, plant resources and waterways. A particular feature may be part of a significant village or habitation area, but one would never know that if only the feature was analyzed by itself. The Tribe believes that taking a regional analysis would show that there is a high potential for subsurface resources to be found during grading or ground-disturbing activities for this Project.

With regard to this Project, the Tribe believes that the lack of research, tribal consultation and requirement for professional archaeological and tribal monitoring on the Perris Valley floor has resulted in the determination that this area was minimally used prehistorically. The tendency for archaeologists to write off this area based upon surface evidence has most assuredly resulted in the dismissal and destruction of subsurface sites. Like surface resources such as milling outcrops and lithic scatters, the Tribe views subsurface resources as important and which often provides better information about the larger village complex which can aide in the analysis of that complex and surrounding area. The Tribe contends this culturally sensitive portion of the Perris Valley floor is connected to the larger network of extensively used habitation, ceremonial and subsistence areas that extends for many miles in every direction of the Project.

Response to Pechanga Comment 6

The identification of surface artifacts was not the only factor used in determining resource impacts, as stated in the DEIR (page 4.5-12) and the historical/archaeological report (pages 6 and 7) and adequate mitigation was incorporated into the DEIR to ensure no significant impacts to unknown buried resources result from project development. The comment did not raise any new environmental issue not already addressed in the DEIR.

Pechanga Comment 7

REQUESTED TRIBAL INVOLVEMENT AND MITIGATION

The proposed Project is on land that is within the traditional territory of the Pechanga Band of Luiseño Indians. The Pechanga Band is not opposed to this Project. The Tribe's primary concerns stem from the Project's proposed impacts on Native American cultural resources. The Tribe is concerned about both the protection of unique and irreplaceable cultural resources, such as Luiseño village sites, sacred sites and archaeological items which would be displaced by ground disturbing work on the Project, and on the proper and lawful treatment of cultural items, Native American human remains and sacred items likely to be discovered in the course of the work.

The Tribe requests to be involved and participate with the City of Perris in assuring that an adequate environmental assessment is completed, and in developing all monitoring and mitigation plans and measures for the duration of the Project. In addition, given the sensitivity of the Project area, it is the position of the Pechanga Tribe that professional Pechanga tribal monitors be required to be present during all ground-disturbing activities conducted in connection with the Project, including any additional archeological excavations performed.

The CEQA Guidelines state that lead agencies should make provisions for inadvertent discoveries of cultural resources (CEQA Guidelines §15064.5). As such, it is the position of the Pechanga Tribe that an agreement specifying appropriate treatment of inadvertent discoveries of cultural resources be executed between the Project Application/Developer and the Pechanga Tribe.

The Tribe believes that adequate cultural resources assessments and management must always include a component which addresses inadvertent discoveries. Every major State and Federal law dealing with cultural resources includes provisions addressing inadvertent discoveries (See e.g.: CEQA (Cal. Pub. Resources Code §21083.2(i); 14 CCR §1506a.5(f)); Section 106 (36 CFR §800.13); NAGPRA (43 CFR §10.4). Moreover, most state and federal agencies have guidelines or provisions for addressing inadvertent discoveries (See e.g.: FHWA, Section 4(f) Regulations - 771.135(g); CALTRANS, Standard Environmental Reference - 5-10.2 and 5-10.3). Because of the extensive presence of the Tribe's ancestors within the Project area, it is not unreasonable to expect to find vestiges of that presence. Such cultural resources and artifacts are significant to the Tribe as they are reminders of their ancestors. Moreover, the Tribe is expected to protect and assure that all cultural sites of its ancestors are appropriately treated in a respectful manner. Therefore, as noted previously, it is crucial to adequately address the potential for inadvertent discoveries.

Further, the Pechanga Tribe believes that if human remains are discovered, State law would apply and the mitigation measures for the permit must account for this. According to the California Public Resources Code, § 5097.98, if Native American human remains are discovered, the Native American Heritage Commission must name a "most likely descendant," who shall be consulted as to the appropriate disposition of the remains. Given the Project's location in Pechanga territory, the Pechanga Tribe intends to assert its right pursuant to California law with regard to any remains or items discovered in the course of this Project.

Response to Pechanga Comment 7

The City is duly concerned with the proper and lawful treatment of cultural resources and has proposed mitigation measures to ensure no significant impacts to unknown cultural resources, including human remains, occur as a result from project development. As previously stated, the City will continue to include the Tribe in the review process by providing responses to comments received on the DEIR and providing notices of upcoming public hearings on the project. No other consultations are required by law for this type of project.

Mitigation measures **MM Cultural 1** and **MM Cultural 3**, as set forth in the DEIR, make provisions for the inadvertent discovery of cultural resources, including human remains, and how they are treated. Also, the City is not responsible for deciding the “most likely descendant” and the proposed mitigation measures require the procedure identified in the comment. The project complies with provisions of Section 15064.5 of the *CEQA Guidelines*. Further, there is no requirement for the development of an agreement for the treatment and disposing of cultural resources in Section 15064.5. No new environmental issues have been raised by this comment and no modification of the DEIR is required.

Pechanga Comment 8

PROJECT MITIGATION MEASURES

The Tribe believes that the proposed mitigation measures as posed are not sufficient, given the sensitivity of the area. Although the mitigation measures allow for an archaeological monitor and address procedures for inadvertent finds and human remains, the Tribe is concerned with the lack of a requirement for tribal monitor professionals. While the Tribe understands that the Property has been subjected to previous disturbances, as the project site lies within such a culturally-sensitive area, the Tribe believes that the possibility exists for the recovery of subsurface resources during earthmoving activities. As stated above, it is imperative that both archaeological and professional tribal monitors be present during all earthmoving activities.

As such, the Tribe requests the following changes and additions to the proposed mitigation measures for this Project (deletions are noted by strikethroughs and additions by underlines).

MM Cultural 2: At least 30 days prior to beginning project construction, the Project Applicant shall contact the Pechanga Tribe to notify the Tribe of grading, excavation and the monitoring program, and to coordinate with the City of Perris and the Tribe to develop a Cultural Resources Treatment and Monitoring Agreement. The Agreement shall address the treatment of known cultural resources, the designation, responsibilities, and participation of Native American Tribal monitor professionals during grading, excavation and ground disturbing activities; project grading and development scheduling; terms of compensation for the monitors by the Developer; and treatment and final disposition of any cultural resources, sacred sites, and human remains discovered on the site.

MM Cultural 3: In accordance with the agreement required in MM Cultural 2, the archaeological monitor's authority to stop and redirect grading will be exercised in consultation with the Pechanga Tribe in order to evaluate the significance of any archaeological resources discovered on the property. Professional tribal monitors shall be allowed to monitor all grading, excavation and groundbreaking activities, and shall also have the authority to stop and redirect grading activities in consultation with the project archaeologist.

MM Cultural 4: All sacred sites, should they be encountered within the project area, shall be avoided and preserved as the preferred mitigation, if feasible.

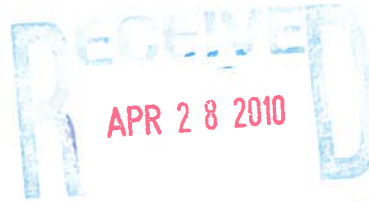
Response to Pechanga Comment 8

As discussed in previous responses, the City does not agree with the Tribe's assertion that the mitigation measures proposed in the DEIR are insufficient or in violation of CEQA. No new environmental issues have been raised by this comment and no modification of the DEIR is required.

COPIES OF COMMENT LETTERS



DEPARTMENT OF THE AIR FORCE
AIR FORCE RESERVE COMMAND



26 Apr 10

MEMORANDUM FOR CITY OF PERRIS

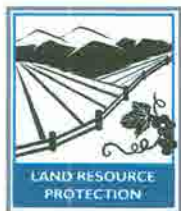
ATTN: DIANE SBARDELLATI, ASSOCIATE PLANNER
DEVELOPMENT SERVICE DEPARTMENT, PLANNING DIVISION
135 NORTH D STREET
PERRIS, CA 92570-2200

FROM: 452 Mission Support Group/ Civil Engineers
Base Operating Support
610 Meyer Drive, Bldg. 2403
March ARB CA 92516-2166

SUBJECT: Draft EIR (SCH NO. 2008111080)

1. The March Air Reserve Base (MARB) review of the proposal to construct and operate approximately 1,191,080 square feet of distribution center uses and all supporting improvements located North of Rider Street, South of the MWD Channel, East of Webster Avenue and West of Indian Avenue is provided with this memorandum.
2. This development is consistent with compatible land use and March Air Reserve Base (MARB) mission operations at the proposed location. The site does not occupy any area impacted by current mission aircraft noise, flight paths, or any zones related to localized aircraft incident statistics.
3. Thank you for the opportunity to review and comment on this proposed development. If you have any further questions please contact Mr. Jack Porter Jr. at (951) 655-2115.

Richard E. Eunice
RICHARD E. EUNICE, P.E.
BASE CIVIL ENGINEER



DEPARTMENT OF CONSERVATION

DIVISION OF LAND RESOURCE PROTECTION

801 K STREET • MS 18-01 • SACRAMENTO, CALIFORNIA 95814

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May 18, 2010

VIA FACSIMILE (951) 943-8379

Ms. Diane Sbardellati, Associate Planner
City of Perris Planning Division
135 North D Street
Perris, CA 92570

Subject: DEIR for the (Rados Distribution Center) Zone Change 07-0117,
Development Plan Review 07-0119 and Agricultural Diminishment 07-
0118 - SCH# 2008111080

Dear Ms. Sbardellati:

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Zone Change 07-0117, Development Plan Review 07-0119 and Agricultural Diminishment 07-0118 DEIR for the Rados Distribution Center. The Division monitors farmland conversion on a statewide basis and administers the California Land Conservation (Williamson) Act and other agricultural land conservation programs. We offer the following comments and recommendations with respect to the proposed project's potential impacts on agricultural land and resources.

Project Description:

The proposed project is for the construction of the Rados Distribution Center in the City of Perris, east of Interstate 215. The proposed project is a 1,191,080 square foot distribution center on 61.63 acres, with approximately 720 standard parking spaces, 13 handicapped parking spaces, and 353 trailer parking spaces. The site is currently designated Light Industrial per the City of Perris General Plan. The project also proposes a Zone Change (07-0117) from A1 (Light Agriculture) to LI (Light Industrial), which will make the project consistent with the current General Plan. An Agricultural Diminishment (07-0118) is also required and proposes to remove the subject property from the Perris Valley Agricultural Preserve No. 1, Map No. 56.

The project site consists of mainly leveled farmland, part of which was previously a sod farm. The project site is currently leased to a farmer who plants winter wheat and plows the weeds year round. Per the DEIR, development of the proposed project will convert approximately 58 acres of Prime Farmland and approximately six acres of Farmland of Local Importance into non-agricultural land uses.

Ms. Diane Sbardellati
May 18, 2010
Page 2 of 3

Division Comments:

After a review of the Agricultural Resources Section, the Division can find no mention of why partial mitigation was not considered for this project. The DEIR states that *"... although existing agricultural land within the City of Perris Planning Area 3 has not yet been formally committed to non-agricultural use through formal approval of development applications, it has all been designated for urban density land uses by the City of Perris General Plan."* The DEIR also states that no mitigation is necessary because there is none available to reduce or eliminate impacts. In fact, mitigation for this loss of Prime and Farmland of Local Importance may be available, and is further discussed below.

Was a mitigation requirement plan considered as part of the adopted General Plan? If not, then the City should consider requiring mitigation at the specific project development stage. This project not only impacts Prime Farmland and Farmland of Local Importance, but also has indirect impacts on nearby Williamson Act contracts by creating development pressure in their vicinity.

The LESA report prepared by Albert A. Webb Associates concluded that this project would be considered a Significant Impact, yet no mitigations are being required for its development. The Division strongly recommends that the City review its options for agricultural mitigations to partially offset the identified impacts to agricultural land.

Mitigation Measures

Although direct conversion of agricultural land is often an unavoidable impact under California Environmental Quality Act (CEQA) analysis, feasible mitigation measures must be considered.

The loss of agricultural land represents a permanent reduction in the State's agricultural land resources. As such, the Department recommends the use of permanent agricultural conservation easements on land of at least equal quality and size as partial compensation for the direct loss of agricultural land. If a Williamson Act contract is terminated, or if growth inducing or cumulative agricultural impacts are involved, the Department recommends that this ratio of conservation easements to lost agricultural land be increased. Mitigation for the loss of Prime Farmland is suggested at a 2:1 ratio due to its importance in the State of California. Conservation easements will protect a portion of those remaining land resources and lessen project impacts in accordance with CEQA Guideline §15370. The Department highlights this measure because of its acceptance and use by lead agencies as an appropriate mitigation measure under CEQA and because it follows an established rationale similar to that of wildlife habitat mitigation.

Ms. Diane Sbardellati
May 18, 2010
Page 3 of 3

Mitigation via agricultural conservation easements can be implemented by at least two alternative approaches: the outright purchase of easements or the donation of mitigation fees to a local, regional or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural conservation easements. The conversion of agricultural land should be deemed an impact of at least regional significance. Hence the search for replacement lands may be conducted regionally or statewide, and need not be limited strictly to lands within the project's surrounding area.

The Department also has available a listing of approximately 30 "conservation tools" that have been used to conserve or mitigate project impacts on agricultural land. This compilation report may be requested from the Division at the address or phone number at the conclusion of this letter. Of course, the use of conservation easements is only one form of mitigation that should be considered. Any other feasible mitigation measures should also be considered.

Thank you for giving us the opportunity to comment on the DEIR for the Zone Change 07-0117, Development Plan Review 07-0119 and Agricultural Diminishment 07-0118 for the Rados Distribution Center. Please provide this Department with the date of any hearings for this particular action, and any staff reports pertaining to it. If you have questions regarding our comments, or require technical assistance or information on agricultural land conservation, please contact Meri Meraz, Environmental Planner, at 801 K Street, MS 18-01, Sacramento, California 95814, or by phone at (916) 445-9411.

Sincerely,



Dan Otis
Program Manager
Williamson Act Program

cc: State Clearinghouse



Department of Toxic Substances Control

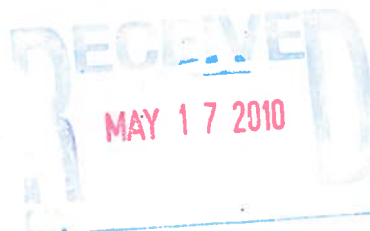


Linda S. Adams
Secretary for
Environmental Protection

Maziar Movassaghi
Acting Director
5796 Corporate Avenue
Cypress, California 90630

Arnold Schwarzenegger
Governor

May 17, 2010



Ms. Diane Sbardellati
City of Perris Planning Division
135 North "D" Street
Perris, California 92570

NOTICE OF COMPLETION & ENVIRONMENTAL IMPACT REPORT (EIR) FOR ZONE CHANGE 07-0117 (SCH# 208111080)

Dear Ms. Sbardellati:

The Department of Toxic Substances Control (DTSC) has received your submitted Notice of Preparation of the Environmental Impact Report for the above-mentioned project. The following project description is stated in your document: "The proposed project is an approximately 1,191,080 square foot distribution center on approximately 61.63 gross acres. The project also includes approximately 720 standard, 13 handicapped and 353 trailer parking spaces. The MWD property to the north would be leased for use as overflow parking".

Based on the review of the submitted document DTSC has the following comments:

- 1) The EIR should evaluate whether conditions within the project area may pose a threat to human health or the environment. Following are the databases of some of the regulatory agencies:
 - National Priorities List (NPL): A list maintained by the United States Environmental Protection Agency (U.S.EPA).
 - Envirostor (formerly CalSites): A Database primarily used by the California Department of Toxic Substances Control, accessible through DTSC's website (see below).

- Resource Conservation and Recovery Information System (RCRIS): A database of RCRA facilities that is maintained by U.S. EPA.
 - Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS): A database of CERCLA sites that is maintained by U.S. EPA.
 - Solid Waste Information System (SWIS): A database provided by the California Integrated Waste Management Board which consists of both open as well as closed and inactive solid waste disposal facilities and transfer stations.
 - GeoTracker: A List that is maintained by Regional Water Quality Control Boards.
 - Local Counties and Cities maintain lists for hazardous substances cleanup sites and leaking underground storage tanks.
 - The United States Army Corps of Engineers, 911 Wilshire Boulevard, Los Angeles, California, 90017, (213) 452-3908, maintains a list of Formerly Used Defense Sites (FUDS).
- 2) The EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may be contaminated, and the government agency to provide appropriate regulatory oversight. If necessary, DTSC would require an oversight agreement in order to review such documents.
- 3) Any environmental investigations, sampling and/or remediation for a site should be conducted under a Workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup. The findings of any investigations, including any Phase I or II Environmental Site Assessment Investigations should be summarized in the document. All sampling results in which hazardous substances were found above regulatory standards should be clearly summarized in a table. All closure, certification or remediation approval reports by regulatory agencies should be included in the EIR.
- 4) If buildings, other structures, asphalt or concrete-paved surface areas are being planned to be demolished, an investigation should also be conducted for the presence of other hazardous chemicals, mercury, and asbestos containing materials (ACMs). If other hazardous chemicals, lead-based paints (LPB) or products, mercury or ACMs are identified,

proper precautions should be taken during demolition activities. Additionally, the contaminants should be remediated in compliance with California environmental regulations and policies.

- 5) Future project construction may require soil excavation or filling in certain areas. Sampling may be required. If soil is contaminated, it must be properly disposed and not simply placed in another location onsite. Land Disposal Restrictions (LDRs) may be applicable to such soils. Also, if the project proposes to import soil to backfill the areas excavated, sampling should be conducted to ensure that the imported soil is free of contamination.
- 6) Human health and the environment of sensitive receptors should be protected during any construction or demolition activities. If necessary, a health risk assessment overseen and approved by the appropriate government agency should be conducted by a qualified health risk assessor to determine if there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment.
- 7) If it is determined that hazardous wastes are, or will be, generated by the proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5). If it is determined that hazardous wastes will be generated, the facility should also obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942. Certain hazardous waste treatment processes or hazardous materials, handling, storage or uses may require authorization from the local Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA.
- 8) DTSC can provide cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies that are not responsible parties, or a Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA or VCA, please see www.dtsc.ca.gov/SiteCleanup/Brownfields, or contact Ms. Maryam Tasnif-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489.
- 9) For future CEQA documents, please provide the email address of the person to whom comments should be sent.

If you have any questions regarding this letter, please contact me at ashami@dtsc.ca.gov, or by phone at (714) 484-5472.

Sincerely,



Al Shami
Project Manager
Brownfields and Environmental Restoration Program

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044
state.clearinghouse@opr.ca.gov.

CEQA Tracking Center
Department of Toxic Substances Control
Office of Environmental Planning and Analysis
P.O. Box 806
Sacramento, California 95812
ADelacr1@dtsc.ca.gov

CEQA#2868



STATE OF CALIFORNIA

GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNITARNOLD SCHWARZENEGGER
GOVERNORCYNTHIA BRYANT
DIRECTOR

May 17, 2010

Diane Sbardellati
City of Perris Planning Division, Dev. Services Dept.
135 North D Street
Perris, CA 92570-1998Subject: Zone Change 07-0117, Development Plan Review 07-0119 and Agricultural Diminishment 07-0118
SCH#: 2008111080

Dear Diane Sbardellati:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on May 12, 2010, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Acting Director, State Clearinghouse

Enclosures

cc: Resources Agency

SCH# 2008111080
Project Title Zone Change 07-0117, Development Plan Review 07-0119 and Agricultural Diminishment 07-0118
Lead Agency Perris, City of

Type EIR Draft EIR
Description The proposed project is an approximately 1,191,080 square foot distribution center on approximately 61.63 gross acres. The project also includes approximately 720 standard, 13 handicapped and 353 trailer parking spaces. The MWD property to the north would be leased for use as overflow truck parking.

Lead Agency Contact

Name Diane Sbardellati
Agency City of Perris Planning Division, Dev. Services Dept.
Phone (951) 943-5003 x 252 **Fax**
email
Address 135 North D Street
City Perris **State** CA **Zip** 92570-1998

Project Location

County Riverside
City Perris
Region
Lat / Long 33° 50' 27" N / 117° 13' 04" W
Cross Streets Northeast corner of Rider Street and Webster Avenue
Parcel No. 303-050-002, 003
Township 4S **Range** 3W **Section** 7 **Base** SBB&M

Proximity to:

Highways 215
Airports March Air Reserve Base
Railways BNSF
Waterways Lake Perris
Schools Val Verde E.S., Triple Crown E.S., May Ranch E.S., Val Verde High
Land Use PLU: Vacant land in agricultural use
 Z: A1 (Light Agriculture)
 GPD: LI (Light Industrial)

Project Issues Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Cumulative Effects; Drainage/Absorption; Geologic/Seismic; Growth Inducing; Landuse; Noise; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Game, Region 6; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 8; Regional Water Quality Control Board, Region 8; Department of Toxic Substances Control; Native American Heritage Commission; State Lands Commission

Date Received 03/29/2010 **Start of Review** 03/29/2010 **End of Review** 05/12/2010

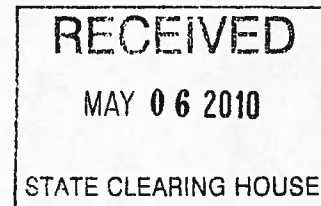
NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
Fax (916) 657-5390
Web Site www.nahc.ca.gov
e-mail: ds_nahc@pacbell.net



May 5, 2010

Clear
5.12.10
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Ms. Diane Sbardellati, Associate Planner

CITY OF PERRIS

135 "D" Street
Perris, CA 92570

Re: SCH#2008111080 CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Distribution Center Project located on 61-acres with approximately one million square feet of floor space; City of Perris; Riverside County, California

Dear Ms. Sbardellati:

The Native American Heritage Commission (NAHC) is the state 'trustee agency' pursuant to Public Resources Code §21070 for the protection and preservation of California's Native American Cultural Resources.. (Also see *Environmental Protection Information Center v. Johnson* (1985) 170 Cal App. 3rd 604). The California Environmental Quality Act (CEQA - CA Public Resources Code §21000-21177, amended in 2009) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the California Code of Regulations §15064.5(b)(c)(f) CEQA guidelines). Section 15382 of the CEQA Guidelines defines a significant impact on the environment as "a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE)', and if so, to mitigate that effect. To adequately assess the project-related impacts on historical resources, the Commission recommends the following.

The Native American Heritage Commission did perform a Sacred Lands File (SLF) search in the NAHC SLF Inventory, established by the Legislature pursuant to Public Resources Code §5097.94(a) and Native American Cultural resources were not identified within the APE, as previously described. Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries once a project is underway. Enclosed are the names of the nearest tribes and interested Native American individuals that the NAHC recommends as 'consulting parties,' for this purpose, that may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We recommend that you contact persons on the attached list of Native American contacts. A Native American Tribe or Tribal Elder may be the only source of information about a cultural resource.. Also, the NAHC recommends that a Native American Monitor or Native American culturally knowledgeable person be employed whenever a professional archaeologist is employed during the 'Initial Study' and in other phases of the environmental planning processes.. Furthermore we suggest that you contact the California Historic Resources Information System (CHRIS) at the Office of Historic Preservation (OHP) Coordinator's office (at (916) 653-7278, for referral to the nearest OHP Information Center of which there are 11.

Consultation with tribes and interested Native American tribes and interested Native American individuals, as consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA (42 U.S.C. 4321-43351) and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 [f] *et seq.*), 36 CFR Part 800.3, the President's Council on Environmental Quality (CSQ; 42 U.S.C. 4371 *et seq.*) and NAGPRA (25 U.S.C. 3001-3013), as appropriate. The 1992 *Secretary of the Interior's Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including *cultural landscapes*.

Lead agencies should consider avoidance, as defined in Section 15370 of the California Environmental Quality Act (CEQA) when significant cultural resources could be affected by a project. Also, Public Resources Code Section 5097.98 and Health & Safety Code Section 7050.5 provide for provisions for accidentally discovered archeological resources during construction and mandate the processes to be followed in the event of an accidental discovery of any human remains in a project location other than a 'dedicated cemetery. Discussion of these should be included in your environmental documents, as appropriate.

The authority for the SLF record search of the NAHC Sacred Lands Inventory, established by the California Legislature, is California Public Resources Code §5097.94(a) and is exempt from the CA Public Records Act (c.f. California Government Code §6254.10). The results of the SLF search are confidential. However, Native Americans on the attached contact list are not prohibited from and may wish to reveal the nature of identified cultural resources/historic properties. Confidentiality of 'historic properties of religious and cultural significance' may also be protected under Section 304 of the NHPA or at the Secretary of the Interior's discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C. 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APE and possibly threatened by proposed project activity.

CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens. Although tribal consultation under the California Environmental Quality Act (CEQA; CA Public Resources Code Section 21000 – 21177) is 'advisory' rather than mandated, the NAHC does request 'lead agencies' to work with tribes and interested Native American individuals as 'consulting parties,' on the list provided by the NAHC in order that cultural resources will be protected. However, the 2006 SB 1059 the state enabling legislation to the Federal Energy Policy Act of 2005, does mandate tribal consultation for the 'electric transmission corridors. This is codified in the California Public Resources Code, Chapter 4.3, and §25330 to Division 15, requires consultation with California Native American tribes, and identifies both federally recognized and non-federally recognized on a list maintained by the NAHC

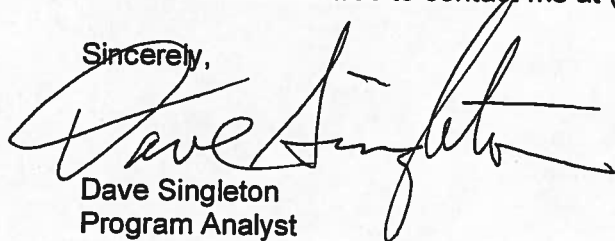
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medical examiner can determine whether the remains are those of a Native American. . Note that §7052 of the Health & Safety Code states that disturbance of Native American cemeteries is a felony.

Again, Lead agencies should consider avoidance, as defined in §15370 of the California Code of Regulations (CEQA Guidelines), when significant cultural resources are discovered during the course of project planning and implementation

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Dave Singleton", with a long horizontal flourish extending to the right.

Dave Singleton
Program Analyst

Attachment: List of Native American Contacts

Cc: State Clearinghouse

STATE OF CALIFORNIA

Arnold Schwarzenegger, Governor

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
Fax (916) 657-5390
Web Site www.nahc.ca.gov
e-mail: ds_nahc@pacbell.net



May 5, 2010

Ms. Diane Sbardellati, Associate Planner

CITY OF PERRIS

135 "D" Street
Perris, CA 92570

Re: SCH#2008111080 CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Distribution Center Project located on 61-acres with approximately one million square feet of floor space; City of Perris; Riverside County, California

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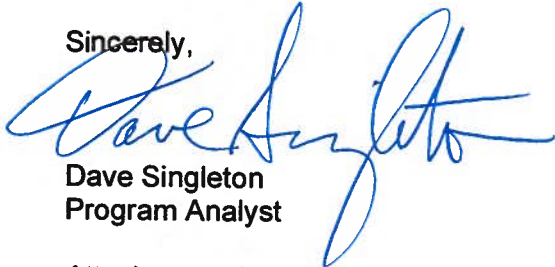
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Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely,



Dave Singleton
Program Analyst

Attachment: List of Native American Contacts

Cc: State Clearinghouse

May 5, 2010
Riverside County

Pechanga Band of Mission Indians
Paul Macarro, Cultural Resource Center
P.O. Box 1477 Luiseno
Temecula, CA 92593
pmacarro@pechanga-nsn.
(951) 308-9295 Ext 8106
(951) 676-2768
(951) 506-9491 Fax

Ramona Band of Cahuilla Mission Indians
Joseph Hamilton, Chairman
P.O. Box 391670 Cahuilla
Anza, CA 92539
admin@ramonatribe.com
(951) 763-4105
(951) 763-4325 Fax

Santa Rosa Band of Mission Indians
John Marcus, Chairman
P.O. Box 609 Cahuilla
Hemet, CA 92546
srtribaloffice@aol.com
(951) 658-5311
(951) 658-6733 Fax

Morongo Band of Mission Indians
Michael Contreras, Cultural Heritage Prog.
12700 Pumarra Road Cahuilla
Banning, CA 92220 Serrano
mcontreras@monongo-nsn.
(951) 755-5025
(951) 201-1866 - cell
(951) 922-0105 Fax

Kupa Cultural Center (Pala Band)
Shasta Gaughen, Assistant Director
35008 Pala-Temecula Rd. PMB Box Luiseno
Pala, CA 92059
cupa@palatribe.com
(760) 891-3590
(760) 742-4543 - FAX

Pechanga Band of Mission Indians
Mark Macarro, Chairperson
P.O. Box 1477 Luiseno
Temecula, CA 92593
tbrown@pechanga-nsn.gov
(951) 676-2768
(951) 695-1778 Fax

Willie J. Pink
48310 Pechanga Road Luiseno
Temecula, CA 92592
wjpink@hotmail.com
(909) 936-1216
Prefers e-mail contact

Cahuilla Band of Indians
Luther Salgado, Sr., Chairperson
PO Box 391760 Cahuilla
Anza, CA 92539
tribalcouncil@cahuilla.net
915-763-5549

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code. Also, federal National Environmental Policy Act (NEPA), National Historic Preservation Act, Section 106 and federal NAGPRA. And 36 CFR Part 800.3.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2008111080; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the proposed Distribution Center of over one million square feet on approx. 61-acres; located in the City of Perris; Riverside County, California

May 5, 2010
Riverside County

Anna Hoover, Cultural Analyst
Pechanga Cultural Resources Department
P.O. Box 2183 Luiseño
Temecula, CA 92593
(951)-770-8104
(951) 694-0446 - FAX
ahoover@pechanga-nsn.gov

Ernest H. Siva
Morongo Band of Mission Indians Tribal Elder
9570 Mias Canyon Road Serrano
Banning, CA 92220 Cahuilla
siva@dishmail.com
(951) 849-4676

Joseph Ontiveros, Cultural Resource Department
SOBOBA BAND OF LUISENO INDIANS
P.O. BOX 487 Luiseno
San Jacinto, CA 92581
(951) 654-5544, ext 4137
(951) 663-5279
jontiveros@soboba-msn.gov

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code. Also, federal National Environmental Policy Act (NEPA), National Historic Preservation Act, Section 106 and federal NAGPRA. And 36 CFR Part 800.3.

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**RCTC**

Riverside County Transportation Commission

May 6, 2010

Ms. Diane Sbardellati
City of Perris
135 North "D" Street
Perris, California 92570

Subject: Rados Distribution Center Draft Environmental Impact Report -
SCH No. 2008111080

Dear Ms. Sbardellati,

Thank you for providing the Riverside County Transportation Commission (RCTC) with the opportunity to review and comment on the Rados Distribution Center Draft Environmental Impact Report (EIR). We have identified several issues regarding the proposed project and accompanying environmental analysis relative to the proposed Mid County Parkway (MCP) project. Our review is pursuant to the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq. and California Code of Regulations, Title 14, Section 15000 et seq. [State CEQA Guidelines]). RCTC wishes to work cooperatively with the City of Perris (City) to ensure that these concerns are addressed, and submits this comment letter with that goal in mind.

The RCTC, the California Department of Transportation, and the Federal Highway Administration propose to improve west-east transportation in western Riverside County by constructing a new freeway, known as the MCP. In November 2004 and July 2007, RCTC circulated a Notice of Preparation and Supplemental Notice of Preparation, respectively, for the MCP project. Additionally, in October 2008, RCTC circulated a Draft EIR/Environmental Impact Statement (EIS) for two No-Build and five Build alternatives with design variations for a 32 mile freeway through the cities of Corona, Perris, and San Jacinto. Subsequently after public review of the Draft EIR/EIS, in response to public concern and the need to focus transportation funding where the need is the greatest for regional transportation, the RCTC Board formally took action to refocus the MCP project limits between I-215 and SR-79 through the cities of Perris and San Jacinto. While the RCTC board modified the project limits for the MCP project, the alignments for the Build Alternatives east of I-215 will generally be the same. Therefore, the effects of the MCP Build Alternatives (Alternatives 4, 5, and 9) east of I-215, should be considered in the Rados Draft EIR.

CEQA requires that a reasonable analysis of the significant cumulative impacts of a proposed project be prepared (Public Resources code Section 21083(b); State CEQA Guidelines Section 15064(h)). While the Rados Distribution Center Draft EIR includes a "list" approach to the cumulative projects analysis, the proposed MCP project is not identified as a cumulative project. The MCP project should be identified and discussed in the discussion of cumulative impacts that considers "past, recent, and probable future projects producing related or

cumulative impacts, including, if necessary those projects outside the control of the agency..." (CEQA Guidelines Section 15130 (b) (1)(A)). The Rados Distribution Center Draft EIR should consider the cumulative impacts associated with MCP Build Alternatives 4, 5, and 9 east of I-215.

The CEQA Guidelines [(Section 15130(b)(5)] also state that "a reasonable analysis of the cumulative impacts of the relevant project" be included, and that the EIR "shall examine reasonable, feasible options for mitigating or avoiding the project contribution to any significant cumulative effects." Inasmuch as the cumulative analysis in the Rados Draft EIR excludes the MCP project as a reasonably foreseeable project, an adequate analysis of potential significant cumulative effects has not been provided and the opportunity to identify mitigation or alternatives that would avoid or reduce significant impacts has not been explored. RCTC urges the City to diligently consider and include an analysis of cumulative environmental effects that incorporates the MCP project.

Lastly, while the proposed Rados Distribution Center would not be directly impacted by the proposed MCP Alternatives 4 and 9 east of I-215, Alternative 5, if selected, would bisect the project site and directly impact the proposed Rados Distribution Center project site. The RCTC Board has not selected a Preferred Alternative for the modified project limits. Relevant information, including the Draft EIR/EIS for the MCP project, is available online at www.midcountyparkway.org. RCTC is currently revising and updating technical studies with the new project limits for the MCP project and plans to circulate a Recirculated Draft EIR/Supplemental Draft EIS in 2011.

Thank you for this opportunity to comment on the proposed Rados Distribution Center Draft EIR. RCTC staff would be pleased to meet with City and applicant representatives to further review our comments and concerns.

Sincerely,

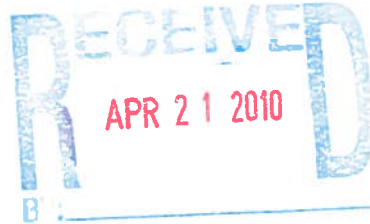


Cathy Bechtel
Project Development Director
Riverside County Transportation Commission

Cc: G. Quintero, M. Massman and S. Keel (Bechtel)

**Riverside Transit Agency**

1825 Third Street
P.O. Box 59968
Riverside, CA 92517-1968
Phone: (951) 565-5000
Fax: (951) 565-5001



April 19, 2010

Diane Sbardellate
Planning Division
City of Perris
135 N. D St.
Perris, CA 92570-2200

Dear Ms. Sbardellate,

As requested, we have reviewed the Notice of EIR you submitted for the Rados Distribution Center. As such, here are our findings/suggestions:

Although RTA does not currently have transit service to this site, given the scope of the project and the planned inclusions in it, we recommend that possible future public transportation should be an element included as the project progresses. This would include identifying potential bus stops, possible inclusion of bus stop amenities (e.g. shelters, benches) and assuring the streets are constructed to accommodate buses should bus service be added. Please also note that public transit can serve as a mitigation measure to decrease vehicle traffic.

Please do not hesitate to contact me with any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "Scott Richardson". The signature is fluid and cursive, with a large, stylized "S" at the beginning.

Scott Richardson
Planning and Program Manager
Riverside Transit Agency

Phone: 951-565-5250
Fax: 951-565-5251



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

EMAILED: May 11, 2010

May 11, 2010

Ms. Diane Sbardellati
Planning Division
City of Perris
135 North D Street
Perris, CA 92570-2200

Review of the Draft Environmental Impact Report (Draft EIR) for the Rados Distribution Center Project

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned document, including with an extended review period. The following comments are meant as guidance for the lead agency and should be incorporated into the Final Environmental Impact Report (Final EIR) as appropriate.

Truck Trip Rates

AQMD staff is concerned that the air quality impacts reported in the Draft EIR may be underestimated. Specifically, the lead agency states in Table 4.12-G that there will be no more than 384 heavy duty truck trips per day at this facility. This equates to 192 trucks visiting the facility per day. This low number of truck trips is surprising given the large number of proposed loading docks (254 docks) and truck parking stalls (353) [App. C, page 1]. Based on these figures, over two-thirds of the loading docks and truck parking stalls will remain idle from heavy duty truck activity on a daily basis [$192 / (254 + 353) = 0.32$]. Based on information presented in the Draft EIR, this presumed level of inactivity does not seem reasonable for a project designed to serve as a major distribution center serving regional interests.

The lead agency uses this low truck trip rate in the Draft EIR to determine that operational air quality impacts will not expose sensitive receptors to significant pollutant concentrations, including a nearby school. AQMD staff therefore recommends that further justification be presented in the Final EIR for the minimal truck use projected at this distribution center. If the lead agency determines that additional trucks may use this facility, impacts from this increased use should be presented in either a Recirculated Draft EIR or the Final EIR. If the lead agency determines that the truck trip rate specified in the Draft EIR is appropriate, enforceable conditions should be placed in the Final EIR that limit the number of heavy duty trucks visiting the facility to 192 per day or less.

Modeling Analysis

AQMD staff is also concerned that the modeling analysis does not accurately portray project emissions. Revisions to the modeling should be included in the Recirculated Draft EIR or Final EIR based on the following:

- The LST air quality analysis presented in the Draft EIR does not account for truck travel between the proposed facility and the closest major traffic corridors. Truck travel routes may run adjacent to nearby sensitive receptors such as schools or residences. AQMD staff recommends that the lead agency clearly specify truck routes between this facility and nearby transportation corridors, and the air quality impacts from trucks traveling along these arterial roads in the Recirculated Draft EIR or Final EIR.
- Air quality modeling of facility operations in the Draft EIR uses emission rates derived from URBEMIS outputs for operational truck activity offsite as input for AERMOD emission rates for truck activity onsite. This emission rate is inappropriate for AERMOD use as it is based on trucks traveling on roadways, and does not account for truck travel or idling activities onsite. Site specific emission factors should be calculated based on assumed onsite travel distances and up to 15 minutes of idling activity per truck visit. This emission rate should then be used in the AERMOD modeling analysis.
- For NO_x emissions, the release height of source SLINE1 varies from 14.01 feet to 7.45 feet. AQMD staff recommends that an explanation of this reduction in release height should be presented in the Final EIR, or the release height should remain constant in the final modeling analysis.
- In the Health Risk Assessment (HRA) Diesel Particulate Matter (DPM) modeling file, 10 of the 19 roadway line sources modeled have emission rates of zero grams per second (SLINE 1, 2, 3, 4, 5, 6, 8, 9, 10, 15). AQMD staff recommends that the lead agency revise the analysis to include these roadway segments in the HRA, especially those near sensitive receptors.

Mitigation Measures

Lastly, given the project's potential exposure of sensitive receptors surrounding the project site to diesel emissions, AQMD staff recommends that the lead agency consult the Western Riverside Council of Governments *Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities*.¹ Consistent with this guidance, AQMD staff recommends adding the following mitigation measures to minimize potentially significant air quality impacts from the operational phase of the project, if feasible:

- ❖ Restrict operation to “clean” trucks, such as a 2007 or newer model year or 2010 compliant vehicle;

¹ Available here: <http://www.wrcog.cog.ca.us/downloads/Good+Neighbor+Policies+Final-091205.pdf>

- ❖ Avoid siting new sensitive land uses within 1,000 feet of the warehouse/distribution center;
- ❖ Design the warehouse/distribution center such that entrances and exits discourage trucks from traversing past neighbors or other sensitive receptors;
- ❖ Develop, adopt and enforce truck routes both in an out of city and in and out of facilities;
- ❖ Have truck routes clearly marked with trailblazer signs, so trucks will not enter residential areas;
- ❖ Identify or develop secure locations outside of residential neighborhoods where truckers that live in the community can park their truck, such as a Park & Ride;
- ❖ Re-route truck traffic by adding direct off-ramps for the truck or by restricting truck traffic on certain sensitive routes;
- ❖ Require or provide incentives for particulate traps that meet CARB certified level 3 requirements;
- ❖ Electrify service equipment at facility;
- ❖ Improve traffic flow by signal synchronization; and
- ❖ Conduct air quality monitoring at sensitive receptors.

AQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Ian MacMillan, Program Supervisor CEQA Section, at (909) 396-3244, if you have any questions regarding the enclosed comments.

Sincerely,



Ian MacMillan
Program Supervisor – CEQA Inter-Governmental Review

Attachment

IM:GM
RVC100324-01
Control Number



PECHANGA CULTURAL RESOURCES
Temecula Band of Luiseño Mission Indians

Post Office, Box 2183 • Temecula, CA 92593
Telephone (951) 308-9295 • Fax (951) 506-9491

May 7, 2010

VIA E-Mail and USPS

Ms. Diane Sbardellati
Associate Planner
City of Perris Planning Division
135 N. D Street
Perris, CA 92570-2200

Re: Pechanga Tribe Comments on the Draft Environmental Impact Report (DEIR) for the Rados Distribution Center Project, DPR 07-0119, AD 07-0118, ZC 07-0117, City of Perris

Dear Ms. Sbardellati:

The Pechanga Band of Luiseño Indians, a federally recognized Indian tribe and sovereign government, (hereinafter, "the Tribe") has received the above referenced DEIR, and submits this comment letter on the above listed Project.

The Tribe officially requests involvement in this Project pursuant to Public Resources Code §21092.2, including notification and involvement in the entire CEQA environmental review process for the duration of the above referenced Project. The Tribe further requests to be directly notified of all public hearings and scheduled approvals concerning this Project and requests that these comments be made part of the record of approval for this Project.

The Tribe submits these comments concerning the Project's potential impacts to cultural resources in conjunction with the environmental review of the Project. The Tribe reserves the right to fully participate in the environmental review process, as well as to provide further comment on the Project's impacts to cultural resources and potential mitigation for such impacts. Further, the Tribe reserves the right to participate in the regulatory process and provide comment on issues pertaining to the regulatory process and Project approval.

Chairperson:
Germaine Arenas

Vice Chairperson:
Mary Bear Magee

Committee Members:
Evie Gerber
Darlene Miranda
Bridgett Barcello Maxwell
Aurelia Marruffo
Richard B. Scarce, III

Director:
Gary DuBois

Coordinator:
Paul Macarro

Cultural Analyst:
Anna Hoover

Monitor Supervisor:
Jim McPherson

Pechanga Comment Letter to the City of Perris

Re: Pechanga Tribe Comments on a NOA for the DEIR for the Rados Distribution Center

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THE CITY OF PERRIS MUST INCLUDE INVOLVEMENT OF AND CONSULTATION WITH THE PECHANGA TRIBE IN ITS ENVIRONMENTAL REVIEW PROCESS

It has been the intent of the Federal Government¹ and the State of California² that Indian tribes be consulted with regard to issues which impact cultural and spiritual resources, as well as other governmental concerns. The responsibility to consult with Indian tribes stems from the unique government-to-government relationship between the United States and Indian tribes. This arises when tribal interests are affected by the actions of governmental agencies and departments. In this case, it is undisputed that the project lies within the Pechanga Tribe's traditional territory. Therefore, in order to comply with CEQA and other applicable Federal and California law, it is imperative that the City of Perris consult with the Tribe in order to guarantee adequate knowledge to appropriately evaluate the project effects, as well as generating adequate mitigation measures.

PECHANGA CULTURAL AFFILIATION TO THE PROJECT AREA

The Pechanga Tribe asserts that the Project area is part of the Tribe's aboriginal territory, as evidenced by the existence of Luiseño place names, rock art, pictographs, petroglyphs, a village complex (*Qaxáalku*) and an extensive Luiseño artifact record in the vicinity of the Project. The Tribe further asserts that this culturally sensitive area is affiliated specifically with the Pechanga Band of Luiseño Indians because of the Tribe's specific cultural ties to this area. The Tribe considers any resources located on this Project property to be Pechanga cultural resources.

D. L. True, C. W. Meighan, and Harvey Crew³ stated that the California archaeologist is blessed "with the fact that the nineteenth-century Indians of the state were direct descendents of many of the Indians recovered archaeologically, living lives not unlike those of their ancestors." Similarly, the Tribe knows that their ancestors lived on this land and that the Luiseño peoples still live in their traditional lands. The Tribe's knowledge of our ancestral boundaries is based on reliable information passed down to us from our elders; published academic works in the areas of anthropology, history and ethno-history; and through recorded ethnographic and linguistic accounts. Many anthropologists and historians who have presented boundaries of the Luiseño traditional territory have included the Project area in their descriptions (Drucker 1937; Heiser and Whipple 1957; Kroeber 1925; Smith and Freers 1994), and such territory descriptions correspond with what was communicated to the Pechanga people by our elders. While we agree that anthropological and linguistic theories as well as historic accounts are important in determining

¹ See Executive Memorandum of April 29, 1994 on Government-to-Government Relations with Native American Tribal Governments and Executive Order of November 6, 2000 on Consultation and Coordination with Indian Tribal Governments.

² See California Public Resource Code §5097.9 et seq.; California Government Code §§65351, 65352, 65352.3 and 65352.4

³ D. L. True, C. W. Meighan, and Harvey Crew. Archaeological Investigations at Molpa, San Diego County, California, *University of California Press* 1974 Vol. 11, 1-176

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Pechanga Comment Letter to the City of Perris

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traditional Luiseño territory, the most critical sources of information used to define our traditional territories are our songs, creation accounts and oral traditions.

Luiseño history originates with the creation of all things at 'éxva Teméeku, the present day City of Temecula, and dispersing out to all corners of creation (what is today known as Luiseño territory). It was at Temecula that the Luiseño deity *Wuyóot* lived and taught the people, and here that he became sick, finally expiring at Lake Elsinore. Many of our songs relate the tale of the people taking the dying *Wuyóot* to the many hot springs at Elsinore, where he died (DuBois 1908). He was cremated at 'éxva Teméeku. It is the Luiseño creation account that connects Elsinore to Temecula, and thus to the Temecula people who were evicted and moved to the Pechanga Reservation, and now known as the Pechanga Band of Luiseño Mission Indians (the Pechanga Tribe). From Elsinore, the people spread out, establishing villages and marking their territories. The first people also became the mountains, plants, animals and heavenly bodies.

Many traditions and stories are passed from generation to generation by songs. One of the Luiseño songs recounts the travels of the people to Elsinore after a great flood (DuBois 1908). From here, they again spread out to the north, south, east and west. Three songs, called *Montivol*, are songs of the places and landmarks that were destinations of the Luiseño ancestors, several of which are located near the Project area. They describe the exact route of the Temecula (Pechanga) people and the landmarks made by each to claim title to places in their migrations (DuBois 1908:110). In addition, Pechanga elders state that the Temecula/Pechanga people had usage/gathering rights to an area extending from Rawson Canyon on the east, over to Lake Mathews on the northwest, down Temescal Canyon to Temecula, eastward to Aguanga, and then along the crest of the Cahuilla range back to Rawson Canyon. The Project area is located within the central area of this culturally affiliated territory. The Native American Heritage Commission (NAHC) Most Likely Descendent (MLD) files substantiate this habitation and migration record from oral tradition. These examples illustrate a direct correlation between the oral tradition and the physical place; proving the importance of songs and stories as a valid source of information outside of the published anthropological data.

Tóota yixélval (rock art) is also an important element in the determination of Luiseño territorial boundaries. *Tóota yixélval* can consist of petroglyphs (incised) elements, or pictographs (painted) elements. The science of archaeology tells us that places can be described through these elements. Riverside and Northern San Diego Counties are home to red-pigmented pictograph panels. Archaeologists have adopted the name for these pictograph-versions, as defined by Ken Hedges of the Museum of Man, as the San Luis Rey style. The San Luis Rey style incorporates elements which include chevrons, zig-zags, dot patterns, sunbursts, handprints, net/chain, anthropomorphic (human-like) and zoomorphic (animal-like) designs. Tribal historians and photographs inform us that some design elements are reminiscent of Luiseño ground paintings. A few of these design elements, particularly the flower motifs, the net/chain

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and zig-zags, were sometimes depicted in Luiseño basket designs and can be observed in remaining baskets and textiles today.

An additional type of *tóota yixélval*, identified by archaeologists also as rock art or petroglyphs, are cupules. Throughout Luiseño territory, there are certain types of large boulders, taking the shape of mushrooms or waves, which contain numerous small pecked and ground indentations, or cupules. Many of these cupule boulders have been identified within a few miles of the Project. Additionally, according to historian Constance DuBois:

When the people scattered from Ekvo Temeko, Temecula, they were very powerful. When they got to a place, they would sing a song to make water come there, and would call that place theirs; or they would scoop out a hollow in a rock with their hands to have that for their mark as a claim upon the land. The different parties of people had their own marks. For instance, Albañas's ancestors had theirs, and Lucario's people had theirs, and their own songs of Munival to tell how they traveled from Temecula, of the spots where they stopped and about the different places they claimed (1908:158).

This Project property is located approximately one mile to the east of one of the densest Luiseño village complexes known as *Qaxáalku*. The etymology of the Spanish word Cajalco derives from the Luiseño word for "place of quail." The suffix "ku" is considered a more archaic form of the suffix "anga," which means place of (as in Pechanga...place of dripping water). Throughout the region containing *Qaxáalku* there are still quail but almost as important are the *kukúulam*, or burrowing owl, that once lived there in large numbers. The areas separated by low-lying bedrock boulders provide an ideal habitat for the owls. J.P. Harrington's/Pechanga informant Celestine Ahuayo relates: "*the (that type of) area was known as kukúulam pomkí, which means where the ground owl houses.*" *Kukúul*/burrowing owl is important for the Luiseño because of his status in our Creation Story. Father Boscana wrote of the burrowing owl's role in the Story: '*It was determined by (the lower animals) that Father Wuyóot should received his death by means of poison. Kukiulmal (the small burrowing owl) perceived this and immediately gave the information to Wuyóot.*' Eventually, *Wuyóot* did succumb to poison but the burrowing owl gained a distinction in our Luiseño songs as a good messenger. The *Payómkawichum* (Luiseño people) would have revered the area where this "good apostle" lived by living there as well.

Within the *Qaxáalku* complex, there are at least seven (7) recorded cupule boulders and many others with painted markings (pictographs). Additionally, beyond the numerous bedrock mortars and slicks, are four (4) ancestral quartz quarries. Quartz points were important to the *Payómkawichum* because it is taught that *Suukat* (deer), who gave his life for the starving People in our Creation Story, could only be taken by a point made of quartz.

Pechanga Comment Letter to the City of Perris

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The Project area, located on the floor of Perris Valley, is surrounded by culturally sensitive features. As stated above, to the northwest and southwest is the *Qaxáalku* complex; to the south is the San Jacinto River and to the east is Lake Perris and known sacred and ceremonial sites. Further, our oral traditions state that there were trade and transportation routes that passed through this area. In relation to documented archaeological studies, the Project is located to the immediate south of March Air Reserve Base (MARB). The Tribe has been designated as the affiliated Tribe by LSA Associates for the March Joint Powers Authority and the MARB (Schroth 1999). Our songs and stories, as well as academic works and recorded archaeological/cultural sites, demonstrate that the Luiseño people who occupied the Project area are ancestors of the present-day Pechanga Band of Luiseño Indians, and as such, Pechanga is the appropriate culturally affiliated tribe for projects that impact this geographic area.

The Tribe welcomes the opportunity to meet with the City to further explain and provide documentation concerning our specific cultural affiliation to lands associated with this Project.

PROJECT IMPACTS TO CULTURAL RESOURCES

To date, the Tribe has received the Archaeological Survey Report⁴ and the Draft Environmental Impact Report (DEIR). The Proposed Project is located in a highly sensitive region of Luiseño territory and the Tribe believes that the possibility for recovering subsurface resources during ground-disturbing activities is high. The Tribe does not believe that the proposed mitigation measures in the DEIR fully address the sensitivity of the Project area, nor do they adequately avoid or mitigate impacts to cultural resources. As a result, the Tribe believes that the DEIR is insufficient as drafted and must be amended to appropriately avoid and/or mitigate such impacts. Amendments to the cultural resources impacts must be done in consultation with the Pechanga Tribe, which has significant information which is unavailable to the City or its consultant.

The Tribe is also concerned with the lack of Native American consultation for this Project. No contact was made with the Native American Heritage Commission to identify whether sacred sites were located in or around the project. Nor was any consultation attempted with Native American Tribes other than general public notices. As discuss below, tribes have information that, due to sensitivity and specific tribal policies, cannot necessarily be made public and to which archaeologists are not privy. Early consultation with tribes ensures that concerns about potential projects and impacts to significant and important cultural resources are addressed in a sensitive and meaningful manner. Relying solely on the archaeological consultant for information without contacting a professional tribal consultant regarding *their* ancestors and

⁴ Appendix E - Historical/Archaeological Resources Survey Report, Rados-Perris Distribution Center, Assessors Parcel Number 303-050-002, In the City of Perris, Riverside County, California. CRM Tech#1821A/2416, Tang, Bai "Tom" and Michael Hogan, Revised January 15, 2010

*Pechanga Cultural Resources • Temecula Band of Luiseño Mission Indians
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Pechanga Comment Letter to the City of Perris

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their history does not fulfill the spirit of consultation under CEQA nor does it acknowledge that tribes themselves know specific information about the land, its past history and uses and, more importantly, its ancestors that is vital in the planning process.

The Tribe does not agree with the recommendations as provided in the archaeological study and the DEIR mitigation measures. According to these two documents, no cultural resources were identified during the field walkover. While the Tribe understands that there may not be surface cultural resources, the Project area is likely to contain subsurface cultural resources/inadvertent discoveries. The identification of surface artifacts should not be the only factor in the determination of resource impacts. As stated above, the Tribe knows the region containing the proposed Project to be culturally sensitive with potentially significant subsurface resources, which is supported by the identification within two miles of the Project two Village Complexes, San Luis Rey-style *tóota yixélval*, sacred and ceremonial areas as well as the physical location of the Project. The Tribe believes that any impacts to cultural sites within this area will be a great loss to tribal and scientific knowledge. Additionally, as stated in the archaeological study⁵, an old trail is recorded as running through the western portion of the Project. The Tribe emphasizes that historic trails generally followed existing, older, Native American trails. This further solidifies the Tribe's knowledge that this area was extensively used by their ancestors and that the potential for subsurface resources is high.

Habitation sites and Village Complexes are of utmost importance to the Tribe because they are the last physical remains of where the ancestors lived. They contain information and data that are reflective of every aspect of tribal culture. It is well known that native village and habitation complexes enveloped large areas of land, sometimes several square miles. The Tribe understands that, for various reasons, Cultural Resource Management (CRM) work is often limited to the proposed project with no resources expended for a regional analysis. However, in order to understand the full impacts of the Project on cultural resources, the adjacent resources must be taken into account from not only a scientific archaeological perspective but from a cultural one as well. The Tribe asserts that any analysis of impacts to cultural resources for this Project area must necessarily include all village complexes, even if such complexes exist adjacent to or nearby the Project area.

The Tribe has observed over the last few decades a shift in archaeological practices which looks at cultural resources on an individual scale and on a project-by-project basis. This piecemeal assessment is problematic at best and belies the fact that many of these sites comprise much larger complexes, and further results in evaluations of the sites as not being significant. As a consequence of this approach, very little regional or settlement pattern research is conducted in the Riverside County area to connect the dots and has resulted in the systematic destruction of villages and habitation areas.

⁵ Ibid, page 9 and 10

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The Tribe believes that division of sites and features into separate sites necessarily takes away from the significance of the sites themselves because they are analyzed by only looking at the particulars of that site/feature while missing the relationship to the other sites/features in the vicinity as well as the topography, geography, plant resources and waterways. A particular feature may be part of a significant village or habitation area, but one would never know that if only the feature was analyzed by itself. The Tribe believes that taking a regional analysis would show that there is a high potential for subsurface resources to be found during grading or ground-disturbing activities for this Project.

With regard to this Project, the Tribe believes that the lack of research, tribal consultation and requirement for professional archaeological and tribal monitoring on the Perris Valley floor has resulted in the determination that this area was minimally used prehistorically. The tendency for archaeologists to write off this area based upon surface evidence has most assuredly resulted in the dismissal and destruction of subsurface sites. Like surface resources such as milling outcrops and lithic scatters, the Tribe views subsurface resources as important and which often provides better information about the larger village complex which can aide in the analysis of that complex and surrounding area. The Tribe contends this culturally sensitive portion of the Perris Valley floor is connected to the larger network of extensively used habitation, ceremonial and subsistence areas that extends for many miles in every direction of the Project.

REQUESTED TRIBAL INVOLVEMENT AND MITIGATION

The proposed Project is on land that is within the traditional territory of the Pechanga Band of Luiseño Indians. The Pechanga Band is not opposed to this Project. The Tribe's primary concerns stem from the Project's proposed impacts on Native American cultural resources. The Tribe is concerned about both the protection of unique and irreplaceable cultural resources, such as Luiseño village sites, sacred sites and archaeological items which would be displaced by ground disturbing work on the Project, and on the proper and lawful treatment of cultural items, Native American human remains and sacred items likely to be discovered in the course of the work.

The Tribe requests to be involved and participate with the City of Perris in assuring that an adequate environmental assessment is completed, and in developing all monitoring and mitigation plans and measures for the duration of the Project. In addition, given the sensitivity of the Project area, it is the position of the Pechanga Tribe that professional Pechanga tribal monitors be required to be present during all ground-disturbing activities conducted in connection with the Project, including any additional archeological excavations performed.

The CEQA Guidelines state that lead agencies should make provisions for inadvertent discoveries of cultural resources (CEQA Guidelines §15064.5). As such, it is the position of the Pechanga Tribe that an agreement specifying appropriate treatment of inadvertent discoveries of

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cultural resources be executed between the Project Application/Developer and the Pechanga Tribe.

The Tribe believes that adequate cultural resources assessments and management must always include a component which addresses inadvertent discoveries. Every major State and Federal law dealing with cultural resources includes provisions addressing inadvertent discoveries (See e.g.: CEQA (Cal. Pub. Resources Code §21083.2(i); 14 CCR §1506a.5(f)); Section 106 (36 CFR §800.13); NAGPRA (43 CFR §10.4). Moreover, most state and federal agencies have guidelines or provisions for addressing inadvertent discoveries (See e.g.: FHWA, Section 4(f) Regulations - 771.135(g); CALTRANS, Standard Environmental Reference - 5-10.2 and 5-10.3). Because of the extensive presence of the Tribe's ancestors within the Project area, it is not unreasonable to expect to find vestiges of that presence. Such cultural resources and artifacts are significant to the Tribe as they are reminders of their ancestors. Moreover, the Tribe is expected to protect and assure that all cultural sites of its ancestors are appropriately treated in a respectful manner. Therefore, as noted previously, it is crucial to adequately address the potential for inadvertent discoveries.

Further, the Pechanga Tribe believes that if human remains are discovered, State law would apply and the mitigation measures for the permit must account for this. According to the California Public Resources Code, § 5097.98, if Native American human remains are discovered, the Native American Heritage Commission must name a "most likely descendant," who shall be consulted as to the appropriate disposition of the remains. Given the Project's location in Pechanga territory, the Pechanga Tribe intends to assert its right pursuant to California law with regard to any remains or items discovered in the course of this Project.

PROJECT MITIGATION MEASURES

The Tribe believes that the proposed mitigation measures as posed are not sufficient, given the sensitivity of the area. Although the mitigation measures allow for an archaeological monitor and address procedures for inadvertent finds and human remains, the Tribe is concerned with the lack of a requirement for tribal monitor professionals. While the Tribe understands that the Property has been subjected to previous disturbances, as the project site lies within such a culturally-sensitive area, the Tribe believes that the possibility exists for the recovery of subsurface resources during earthmoving activities. As stated above, it is imperative that both archaeological and professional tribal monitors be present during all earthmoving activities.

As such, the Tribe requests the following changes and additions to the proposed mitigation measures for this Project (deletions are noted by strikethroughs and additions by underlines).

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MM Cultural 1: Prior to grading of the project site, the project developer shall hire a Riverside County qualified archaeologist to provide cultural resource monitoring services at the project site. Selection of the archaeologist shall be subject to the approval of the City of Perris Planning Manager and no grading activities shall occur at the site until the archaeologist has been approved by the City. During grading activities, the archaeologist shall monitor earthmoving activities at the project site consistent with Public Resources Code Section 21083.2(b), (c), and (d). The archaeologist shall be equipped to record and salvage cultural resources that may be unearthed during grading activities. The archaeologist shall be empowered to temporarily halt or divert grading equipment to allow recording and removal of the unearthed resources. ~~If the archaeologist identifies resources of a prehistoric or Native American origin, a Native American observer shall be added to the monitoring program and accompany the archaeologist for the duration of the grading phase.~~ Any Native American resources shall be evaluated in accordance with the CEQA Guidelines, in consultation with the appropriate Native American Tribe and in accordance with their traditional beliefs. ~~and Resources shall either be reburied at the project site or returned to the Tribe, or curated at an accredited facility approved by the City of Perris. Once grading activities have ceased or the archaeologist,~~ in consultation with the appropriate Native American Tribe determines that monitoring is no longer necessary, monitoring activities can be discontinued.

MM Cultural 2: At least 30 days prior to beginning project construction, the Project Applicant shall contact the Pechanga Tribe to notify the Tribe of grading, excavation and the monitoring program, and to coordinate with the City of Perris and the Tribe to develop a Cultural Resources Treatment and Monitoring Agreement. The Agreement shall address the treatment of known cultural resources, the designation, responsibilities, and participation of Native American Tribal monitor professionals during grading, excavation and ground disturbing activities; project grading and development scheduling; terms of compensation for the monitors by the Developer; and treatment and final disposition of any cultural resources, sacred sites, and human remains discovered on the site.

MM Cultural 3: In accordance with the agreement required in MM Cultural 2, the archaeological monitor's authority to stop and redirect grading will be exercised in consultation with the Pechanga Tribe in order to evaluate the significance of any archaeological resources discovered on the property. Professional tribal monitors shall be allowed to monitor all grading, excavation and groundbreaking activities, and shall also have the authority to stop and redirect grading activities in consultation with the project archaeologist.

MM Cultural 4: All sacred sites, should they be encountered within the project area, shall be avoided and preserved as the preferred mitigation, if feasible.

*Pechanga Cultural Resources • Temecula Band of Luiseño Mission Indians
Post Office Box 2183 • Temecula, CA 92592*

Sacred Is The Duty Trusted Unto Our Care And With Honor We Rise To The Need

Pechanga Comment Letter to the City of Perris


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The Pechanga Tribe looks forward to working together with the City of Perris in protecting the invaluable Pechanga cultural resources found in the Project area. Please contact me at 951-308-9295 X8104 once you have had a chance to review these comments so that we might address the issues concerning the mitigation language. If you have any questions, please do not hesitate to contact me. Thank you for the opportunity to submit these comments.

Sincerely,



Anna M. Hoover
Cultural Analyst

Cc: Pechanga Office of the General Counsel
Brad Eckhardt, Perris Planning Manager

3.0 MITIGATION MONITORING AND REPORTING PROGRAM

3.0 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation measures were incorporated into this project to reduce environmental impacts identified in the project Draft and Final Environmental Impact Reports (DEIR and FEIR). Pursuant to Section 15097, a written monitoring and reporting program has been compiled to verify implementation of adopted mitigation measures. “Monitoring” refers to the ongoing or periodic process of project oversight provided by the “Responsible Party” listed in the following table. “Reporting” refers to written compliance review that will be presented to the decision making body or authorized staff person identified in the table below. A report can be required at various stages throughout the project implementation or upon completion of the mitigation measure. The following table provides the required information which includes identification of the potential impact, various mitigation measures, applicable implementation timing, agencies responsible for implementation, and the monitoring/reporting method for each mitigation measure identified.

The following mitigation measures contain several acronyms that are defined in the DEIR and FEIR, but may not be defined in the following mitigation measures. As used in the mitigation measures, these acronyms are defined as follows:

CARB	California Air Reserve Board
CDFG	California Department of Fish and Game
CEQA	California Environmental Quality Act
City	City of Perris
FAA	Federal Aviation Administration
HCP	Habitat Conservation Plan
MARB	March Air Reserve Base
NO _x	Oxides of Nitrogen
MSHCP	Multiple Species Habitat Conservation Plan
PRC	Public Resources Code
PRMTP	Paleontological Resources Monitoring and Treatment Plan
SCAQMD	South Coast Air Quality Management District
SKR	Stephens’ Kangaroo Rat
VOC	Volatile organic compounds

Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Airport Hazards				
Result in a safety hazard for people residing or working in the project area where located within an airport land use plan or, where such a plan has not been adopted, within two miles of public airport or public use airport.	MM Airport 1: All street lights and other outdoor lighting shall be hooded or shielded to prevent either the spillage of lumens or reflection into the sky or above the horizontal plane.	Prior to approval of street improvement plans and prior to building permits	City of Perris Public Works/ Engineering Administration Division Building Division	City to ensure that specified lighting is included.
	MM Airport 2: The following notice shall be provided to all potential purchasers and tenants: “This property is presently located in the vicinity of an airport, within what is known as an airport influence area. For that reason, the property may be subject to some of the annoyances or inconveniences associated with proximity to airport operations (for example, noise, vibration, or odors). Individual sensitivities to those annoyances can vary from person to person. You may wish to consider what airport annoyances, if any, are associated with the property before you complete your purchase and determine whether they are acceptable to you. Business & Profession Code 11010 12(A)”	Prior to certificate of occupancy	City of Perris Planning Division	City to confirm that proper notice has been provided.
	MM Airport 3: The following uses shall be prohibited: (a) Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than an FAA-approved navigational signal light or visual approach slope indicator. (b) Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an aircraft engaged in a straight final approach towards a landing at an airport. (c) Any use which would generate smoke or water vapor or which would attract large concentrations of birds, or which may	Prior to certificate of occupancy	City of Perris Building Division	City to confirm that no proposed businesses contain any prohibited uses.

Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Airport Hazards				
	otherwise affect safe air navigation within the area. (d) Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.			
	MM Airport 4: Prior to recordation of a final map, issuance of building permits, or conveyance to an entity exempt from the Subdivision Map Act, whichever occurs first, the landowner shall convey an aviation easement to March Air Reserve Base.	Prior to recordation of a final map, issuance of building permits, or conveyance to an entity exempt from the Subdivision Map Act, whichever occurs first	City of Perris Building Division Landowner MARB	Proof of aviation easement shall be provided to applicable entity

Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Air Quality				
Violate any air quality standard or contribute substantially to an existing or projected air quality violation.	MM Air 1: Electricity from permanent or temporary power poles shall be used instead of temporary diesel- or gasoline-powered generators to reduce the associated emissions.	Prior to grading permit	City of Perris Planning Division Contractor	Contractor to show power connection for construction purposes for Planning Division approval.
Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).	MM Air 2: All retail/commercial/industrial land uses shall apply paints using either high volume low pressure (HVLP) spray equipment with a minimum transfer efficiency of at least 50% or other application techniques with equivalent or higher transfer efficiency.	Prior to building permit	City of Perris Building Division	City to confirm that this requirement appears in the building construction specifications.

Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Air Quality				
	MM Air 3: Prior to issuance of the grading permit(s), the applicant(s) shall submit a traffic control plan that will describe in detail safe detours and provide temporary traffic control during construction activities. To reduce traffic congestion, and therefore NO _x , the plan shall include, as necessary, appropriate, and practicable, the following: temporary traffic controls such as a flag person during all phases of construction to maintain smooth traffic flow, dedicated turn lanes for movement of construction trucks and equipment on- and off-site, scheduling of construction activities that affect traffic flow on the arterial system to off-peak hour, rerouting of construction trucks away from congested streets or sensitive receptors, and/or signal synchronization to improve traffic flow.	Prior to grading permit	City of Perris Public Works/ Engineering Administration Division and Planning Division	City Planning Division to confirm that the Public Works/Engineering Administration Division. is satisfied with the Traffic Control Plan.
	MM Air 4: During construction, all vehicles and equipment shall be properly maintained according to manufacturers' specifications at an offsite location, which includes proper tuning and timing of engines. Equipment maintenance records and equipment design specification data sheets shall be kept on site during construction.	During construction	Contractor City of Perris Planning Division	Equipment maintenance records and equipment design specification data sheets shall be kept on-site and available for review by the City or SCAQMD during construction.
	MM Air 5: The project developer shall require by contract specification that construction equipment used for construction meets or exceeds Tier 3 standards. Alternatively, all construction equipment shall be equipped with CARB-verified oxidation catalysts, diesel particulate traps or other verified or certified retrofit technologies with the greatest control efficiency for the specific category of equipment. Contract specifications shall be included in project construction documents, which shall be reviewed by the City of Perris prior to issuance of a grading permit.	Prior to grading permits	City of Perris Planning Division	Submittal of project construction specifications for approval.

Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Air Quality				
	MM Air 6: All construction vehicles shall be prohibited from idling in excess of five minutes, both on site and off site.	Prior to grading permit and during construction	City of Perris Planning Division.	City of confirm that this requirement appears in the building construction specifications.
	MM Air 7: Construction parking shall be configured to minimize traffic interference.	Prior to grading permit and during construction	City of Perris Public Works/ Engineering Administration Division And Planning Division	City Planning Division to confirm that the Public Works/Engineering Administration Division is satisfied with the Traffic Control Plan.
	MM Air 8: To reduce VOC emissions associated with architectural coating, the project designer and contractor shall reduce the use of paints and solvents by utilizing pre-coated materials (e.g. bathroom stall dividers, metal awnings), materials that do not require painting, and require coatings and solvents with a VOC content lower than required under Rule 1113 to be utilized. The construction contractor shall be required to utilize “Super-Compliant” VOC paints, which are defined in SCAQMD’s Rule 1113. Construction specifications shall be included in the building specifications that assure these requirements are implemented. The specifications shall be reviewed by the City of Perris’ Building Division for compliance with this mitigation measure prior to issuance of a building permit.	Prior to the issuance of building permit	City of Perris Planning Division	Construction specifications shall be included in the building specifications that assure these requirements are implemented.
	MM Air 9: The developer shall comply with SCAQMD Rule 403. The developer shall provide the City of Perris with the SCAQMD-approved dust control plan, or other sufficient proof of compliance with Rule 403, prior to grading permit issuance.	Prior to grading permit	City of Perris Planning Division	Approved dust control plan or other sufficient proof of compliance with Rule 403

Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Air Quality				
	MM Air 10: All vehicles shall be prohibited from idling in excess of five minutes.	Prior to certificate of occupancy	City of Perris Planning Division	Confirmation that signs have been posted on the building limiting idling.
	MM Air 11: Loading bays shall be equipped with electrification, and/or auxiliary power units.	Prior to building permits	City of Perris Planning Division	Confirmation that architectural plans include electrification, and/or auxiliary power units.
	MM Air 12: Roads and parking areas shall be paved.	Prior to building permit	City of Perris Planning Division	Confirmation that architectural/site plans include paved areas.
	MM Air 13: The project shall post contact information outside the facility for the public to call if a specific air quality issue arises.	Prior to sign approvals	City of Perris Planning Division	Ensure that signs providing this information are provided.
	MM Air 14: In order to promote alternative fuels, and help support “clean” truck fleets, the developer/successor-in-interest shall provide building occupants and businesses with information related to SCAQMD’s Carl Moyer Program, or other state programs that provide funding for cleaner than required heavy-duty engines and emission control devices, such as 2007 or newer model year or 2010 compliant vehicles.	Prior to certificate of occupancy	City of Perris Planning Division	Confirmation that tenants have been provided with information regarding funding for cleaner than required heavy-duty engines and emission control devices.
	MM Air 14a: Service equipment at the facility will be either low-emission propane powered or electric (i.e., forklifts).	Set forth as Condition of Approval prior to project approval.	City of Perris Planning Division	Confirmation that lease agreements include this restriction.

Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Air Quality				
	MM Air 15: The project shall be, at a minimum, required to increase building energy performance 14 percent beyond Title 24, and reduce water use by 20 percent. Prior to issuance of any building permits, building plans shall include proof of these reductions.	Prior to building permits	City of Perris Building Division	Submission of a Title 24 worksheet with building plans shall be required.
	MM Air 16: The project shall be required to use recycled materials for at least 15 percent of construction materials. Regional materials that are extracted, processed, and manufactured regionally will also be required to account for 10 percent of the project.	Prior to building permits	City of Perris Building Division	Construction specifications to include reporting procedure so City can verify compliance.
	MM Air 17: The project shall be required to recycle and/or salvage at least 75 percent of non-hazardous construction and demolition debris by weight and volume.	Prior to building permits	City of Perris Planning Division	Construction specifications to include reporting procedure so City can verify compliance.
	MM Air 18: In order to reduce energy consumption from the proposed project development, applicable plans (e.g., electrical plans, improvement maps, etc.) submitted to the City shall include the installation of energy-efficient street lighting throughout the project site. These plans shall be reviewed and approved by the applicable City Department (e.g., Building Division or Department of Public Works/Engineering) prior to conveyance of applicable streets.	Prior to conveyance of applicable streets	City of Perris Building Division or Department of Public Works/ Engineering Administration Division	Applicable plan shall indicate energy-efficient street lighting throughout the project.

Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Biological Resources				
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.	<p>MM Bio 1: A pre-construction survey for resident burrowing owls will be conducted by a qualified biologist no more than 30 days prior to commencement of grading and construction activities within those portions of the project site containing suitable burrowing owl habitat. The time lapse between surveys and site disturbance should not exceed 30 days. Additional surveys are necessary when the initial disturbance is followed by periods of inactivity or the development is phased spatially and/or temporally over the project site. Burrowing Owl surveys will be conducted in accordance with the methodologies prescribed by CDFG in their 1995 Staff Report and the Burrowing Owl Consortium in their 1993 Burrowing Owl Survey Protocol and Mitigation Guidelines.</p> <p>If active nests are identified on site during the pre-construction survey, they shall be avoided or the owls actively or passively relocated. To adequately avoid active nests, no grading or heavy equipment activity shall take place within at least 250 feet of an active nest during the breeding season (February 1 through August 31), and 160 feet during the non-breeding season.</p> <p>If burrowing owls occupy the site and cannot be avoided, active or passive relocation shall be used to exclude owls from their burrows, as agreed to by the City of Perris Planning Department and the California Department of Fish and Game. Relocation shall be conducted outside the breeding season or once the young are able to leave the nest and fly. Passive relocation is the exclusion of owls from their burrows (outside the breeding season or once the young are able to leave the nest and fly) by installing one-way doors in burrow entrances. These one-way doors allow the owl to exit the burrow, but not enter it. These doors shall be left in place 48 hours to ensure owls have left the burrow. Artificial burrows shall be provided nearby. The project area shall be monitored daily for one week to confirm owl use of burrows before excavating burrows in the impact area. Burrows shall be excavated using hand tools and refilled to prevent</p>	No more than 30 days prior to grading or construction activities and prior to issuance of grading permit	Developer Qualified Biologist City of Perris Planning & Building Division	Developer shall hire a qualified biologist to perform a pre-construction survey. Report shall be provided to the City of Perris Planning Division and the Planning Division. shall notify the Building Division of compliance, prior to the issuance of a grading permit.

Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Biological Resources				
	reoccupation. Sections of flexible pipe shall be inserted into the tunnels during excavation to maintain an escape route for any animals inside the burrow. The CDFG shall be consulted prior to any active relocation to determine acceptable receiving sites available where this species has a greater chance of successful long-term relocation.			
	<p>MM Bio 2: In order to avoid violation of the MBTA and California Fish and Game Code site-preparation activities (removal of trees and vegetation) shall be avoided, to the greatest extent possible, during the nesting season (generally February 1 to August 31) of potentially occurring native and migratory bird species.</p> <p>If site preparation activities are proposed during the nesting/breeding season (February 1 to August 31), a pre-activity field survey shall be conducted by a qualified biologist to determine if active nests of species protected by the Migratory Bird Treaty Act (MBTA) or the California Fish and Game Code are present in the construction zone. If active nests are not located within the project area and appropriate buffer, construction may be conducted during the nesting/breeding season. However, if active nests are located during the pre-activity field survey, no grading or heavy equipment activity shall take place within at least 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected (under MBTA or California Fish and Game Code) bird nests (non-listed), or within 100 feet of sensitive or protected songbird nests until the nest is no longer active.</p>	<p>Mitigation measure required only between February 1 and August 31</p> <p>No more than 30 days prior to issuance of grading permit</p>	<p>Developer Qualified Biologist City of Perris Planning & Building Divisions</p>	<p>Developer shall hire a qualified biologist to perform a pre-activity survey if site preparation is to occur between February 1 and August 31. Report shall be provided to the City of Perris Planning Division and the Planning Division shall notify the Building Division of compliance, prior to the issuance of a grading permit.</p>

Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Biological Resources				
	MM Bio 3: The purpose of the MSHCP is to conserve open space and habitat on a county-wide, cumulative basis. Potential impacts to the SKR are mitigated on a regional basis through compliance the SKR HCP mitigation fees. To address the impacts associated with the cumulative loss of habitat for special status species, the proposed project shall be conditioned to pay the MSHCP mitigation fees as set forth under Ordinance No. 1123 and the City of Perris' Stephens' Kangaroo Rat mitigation fees as set forth under Ordinance No. 794.	Prior to the issuance of grading permits.	City of Perris Planning Division	Payment of fees.

Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Cultural Resources				
The project would cause a substantial adverse change in the significance of an archeological resource pursuant to Section 15064.5 of the <i>CEQA Guidelines</i> .	MM Cultural 1: Prior to grading of the project site, the project developer shall hire a qualified archaeologist to provide cultural resource monitoring services at the project site. Selection of the archaeologist shall be subject to the approval of the City of Perris Planning Manager and no grading activities shall occur at the site until the archaeologist has been approved by the City. During grading activities, the archaeologist shall monitor earthmoving activities at the project site consistent with Public Resources Code Section 21083.2(b), (c), and (d). The archaeologist shall be equipped to record and salvage cultural resources that may be unearthed during grading activities. The archaeologist shall be empowered to temporarily halt or divert grading equipment to allow recording and removal of the unearthed resources. If the archaeologist identifies resources of a prehistoric or Native American origin, a Native American observer shall be added to the monitoring program and accompany the archaeologist for the duration of the grading phase. Any Native American resources shall be evaluated in accordance with the <i>CEQA Guidelines</i> and either reburied at the project site or curated at an accredited facility approved by the City of Perris. Once grading activities have ceased or the archaeologist determines that monitoring is no longer necessary, monitoring activities can be discontinued.	During grading	Developer or its Contractor Qualified Archaeologist City of Perris Planning Manager and Planning Division	Project developer or its contractor shall provide the name of the archaeologist that has been requested to perform cultural resource monitoring at the project site. After the Planning Manager has approved the sections of the qualified archaeologist, the qualified archaeologist shall provide the City Planning Division with a report of the findings and recommendations.

Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Cultural Resources				
The project would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	<p>MM Cultural 2: Prior to the issuance of grading permits, a qualified paleontologist shall be retained to develop a paleontological resources monitoring and treatment plan (PRMTP) in accordance with the provisions of CEQA as well as the proposed guidelines of the Society of Vertebrate Paleontology, and shall include, but not be limited to the following:</p> <ol style="list-style-type: none"> 1. The excavation of areas identified as likely to contain paleontological resources shall be monitored by a full-time qualified paleontological monitor. Monitoring shall be restricted to undisturbed subsurface areas of older alluvium, which might be present below the surface. The monitor shall be prepared to quickly salvage fossils as they are unearthed to avoid construction delays. The monitor shall also remove samples of sediments which are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor must have the power to temporarily halt or divert grading equipment to allow for removal of abundant or large specimens. 2. Collected samples of sediments shall be washed to recover small invertebrate and vertebrate fossils. Recovered specimens shall be prepared so that they can be identified and permanently preserved. 3. Specimens shall be identified and curated, and placed into a repository (such as the Western Science Center or the Riverside Metropolitan Museum) with permanent curation and retrievable storage. 4. A report of findings, including an itemized inventory of recovered specimens, shall be prepared upon completion of the steps outlined above. The report shall include a discussion of the significance of all recovered specimens. The report and inventory, when submitted to the City of Perris Planning Division, will signify completion of the program to mitigate impacts to paleontological resources. 	Prior to grading permit	Developer or its Contractor Qualified Paleontological Monitor City of Perris Planning Division	PRMTP shall be prepared and submitted to the City Planning Division for review and approval prior to issuance of grading permits. Final monitoring and mitigation report of the findings shall be submitted to the City Planning Division within 60 days of completion of the grading activities.

Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Cultural Resources				
The project would disturb any human remains, including those interred outside of formal cemeteries.	MM Cultural 3: If human remains are uncovered at any time, all activities in the area of the find shall be halted by the developer or its contractor and the County Coroner shall be notified immediately pursuant to CA Health & Safety Code Section 7050.5 and CA PRC Section 5097.98. If the Coroner determines that the remains are of Native American origin, the Coroner shall proceed as directed in Section 15064.5(e) of the <i>CEQA Guidelines</i> .	During construction	Developer or its Contractor County Coroner City of Perris Planning Division	Implementation of CA Health & Safety Code Section 7050.5 and CA PRC Section 5097.98; and if the Coroner determines that the remains are of Native American origin, Section 15064.5(3) of the <i>CEQA Guidelines</i> . City to have final determination if impasse occurs between land owner, most likely descendent and archaeologist.

Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Transportation/Traffic				
Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system, or exceed, either individually or cumulatively, a level of service standard established by the city/county congestion management agency for designated roads or highways.	MM Trans 1: Indian Avenue shall be improved to its full street right-of-way to the center lane, plus 15 feet where it fronts the project site.	Prior to approval of street improvement plans Prior to certificate of occupancy	City of Perris Public Works/ Engineering Administration Division City of Perris Building Division	City to ensure that specified cross-sections are provided on the plans and constructed to the City's satisfaction prior to the issuance of a certificate of occupancy.

Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/Monitoring
Transportation/Traffic				
	MM Trans 2: Indian Avenue shall be constructed as a 42-foot pilot road from the northern edge of the project site to Harley Knox Boulevard.	Prior to approval of street improvement plans Prior to certificate of occupancy	City of Perris Public Works/ Engineering Administration Division City of Perris Building Division	City to ensure that specified cross-sections are provided on the plans and constructed to the City's satisfaction prior to the issuance of a certificate of occupancy.
	MM Trans 3: Webster Avenue shall be improved to its full street right-of-way to the center lane, plus 15 feet where it fronts the project site.	Prior to approval of street improvement plans Prior to certificate of occupancy	City of Perris Public Works/ Engineering Administration Division City of Perris Building Division	City to ensure that specified cross-sections are provided on the plans and constructed to the City's satisfaction prior to the issuance of a certificate of occupancy.
	MM Trans 4: Rider Street shall be improved to its full street right-of-way to the center lane, plus 15 feet where it fronts the project site, eastward to Perris Boulevard.	Prior to approval of street improvement plans Prior to certificate of occupancy	City of Perris Public Works/ Engineering Administration Division City of Perris Building Division	City to ensure that specified cross-sections are provided on the plans and constructed to the City's satisfaction prior to the issuance of a certificate of occupancy.
	MM Trans 5: Sight distance at the project entrance roadway shall be reviewed with respect to standard City of Perris sight distance standards at the time of preparation of final grading, landscape and street improvement plans.	Prior to approval of street improvement plans	City of Perris Public Works/ Engineering Administration Division	Approval of street improvement plans.

Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Transportation/Traffic				
	MM Trans 6: The proposed project shall participate in the phased construction of off-site traffic signals through payment of the project's fair share of traffic signal mitigation fees.	Prior to first building permit	City of Perris Public Works/ Engineering Administration Division	Submittal of traffic signal mitigation fee.
	MM Trans 7: Signing/stripping shall be implemented in conjunction with detailed construction plans for the project site.	Prior to the final site plan approval	City of Perris Public Works/ Engineering Administration Division	City to ensure that specified signing/stripping is provided on the plans prior to the final site plan approval and implemented to the City's satisfaction prior to the issuance of a certificate of occupancy.
	MM Trans 8: Construct the intersection of Indian Avenue and Project Driveway to include the following geometrics: Northbound: One left turn lane. One shared through and right turn lane. Southbound: One left turn lane. One shared through and right turn lane. Eastbound: One shared left turn, through, and right turn lane. Stop controlled. Westbound: One shared left turn, through, and right turn lane. Stop controlled.	Prior to approval of street improvement plans Prior to certificate of occupancy	City of Perris Public Works/ Engineering Administration Division City of Perris Building Division	City to ensure that specified cross-sections are provided on the plans and constructed to the City's satisfaction prior to the issuance of a certificate of occupancy.

Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Transportation/Traffic				
	MM Trans 9: Modify the intersection of Indian Avenue and Rider Street to include the following geometrics: Northbound: One left turn lane. One shared through and right turn lane. Stop controlled. Southbound: One left turn lane. One shared through and right turn lane. Stop controlled. Eastbound: One left turn lane. One shared through and right turn lane. Stop controlled. Westbound: One left turn lane. One shared through and right turn lane. Stop controlled.	Prior to approval of street improvement plans Prior to certificate of occupancy	City of Perris Public Works/ Engineering Administration Division City of Perris Building Division	City to ensure that specified cross-sections are provided on the plans and constructed to the City's satisfaction prior to the issuance of a certificate of occupancy.
	MM Trans 10: Construct the intersection of Car Driveway East and Rider Street to restrict movement to right-in and right-out only from the driveway with the following geometrics: Northbound: Not Applicable. Southbound: One right turn lane. Stop controlled. Eastbound: One through lane. Westbound: One shared through and right turn lane.	Prior to approval of street improvement plans Prior to certificate of occupancy	City of Perris Public Works/ Engineering Administration Division City of Perris Building Division	City to ensure that specified cross-sections are provided on the plans and constructed to the City's satisfaction prior to the issuance of a certificate of occupancy.
	MM Trans 11: Construct the intersection of Truck Driveway East and Rider Street to include the following geometrics: Northbound: Not Applicable. Southbound: One shared left turn and right turn lane. Stop controlled. Eastbound: One left turn lane. One through lane. Westbound: One shared through and right turn lane.	Prior to approval of street improvement plans Prior to certificate of occupancy	City of Perris Public Works/ Engineering Administration Division City of Perris Building Division	City to ensure that specified cross-sections are provided on the plans and constructed to the City's satisfaction prior to the issuance of a certificate of occupancy.

Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/Monitoring
Transportation/Traffic				
	MM Trans 12: Construct the intersection of Truck Driveway West and Rider Street to include the following geometrics: Northbound: Not Applicable. Southbound: One shared left turn and right turn lane. Stop controlled. Eastbound: One left turn lane. One through lane. Westbound: One shared through and right turn lane.	Prior to approval of street improvement plans Prior to certificate of occupancy	City of Perris Public Works/ Engineering Administration Division City of Perris Building Division	City to ensure that specified cross-sections are provided on the plans and constructed to the City's satisfaction prior to the issuance of a certificate of occupancy.
	MM Trans 13: Construct the intersection of Car Driveway West and Rider Street to include the following geometrics: Northbound: Not Applicable. Southbound: One shared left turn right turn lane. Stop controlled. Eastbound: One shared left turn through lane. Westbound: One shared through and right turn lane.	Prior to approval of street improvement plans Prior to certificate of occupancy	City of Perris Public Works/ Engineering Administration Division City of Perris Building Division	City to ensure that specified cross-sections are provided on the plans and constructed to the City's satisfaction prior to the issuance of a certificate of occupancy.
	MM Trans 14: Construct the intersection of Webster Avenue and Rider Street to include the following geometrics: Northbound: Not Applicable. Southbound: One left turn lane. One right turn lane. Stop controlled. Eastbound: One left turn lane. One through lane. Westbound: One shared through and right turn lane.	Prior to approval of street improvement plans Prior to certificate of occupancy	City of Perris Public Works/ Engineering Administration Division City of Perris Building Division	City to ensure that specified cross-sections are provided on the plans and constructed to the City's satisfaction prior to the issuance of a certificate of occupancy.

Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Transportation/Traffic				
	MM Trans 15: Construct the intersection of Webster Avenue and Project Driveway to include the following geometrics: Northbound: One shared through and right turn lane. Southbound: One shared left turn and through lane. Eastbound: Not Applicable. Westbound: One shared left turn and right turn lane. Stop controlled.	Prior to approval of street improvement plans Prior to certificate of occupancy	City of Perris Public Works/ Engineering Administration Division City of Perris Building Division	City to ensure that specified cross-sections are provided on the plans and constructed to the City's satisfaction prior to the issuance of a certificate of occupancy.
	MM Trans 16: The project shall participate in the cost of off-site improvements through payment of the fair share mitigation fees. These fees shall be collected and utilized as needed by the City of Perris to construct the improvements necessary to maintain the required level of service and build roads to the general plan build-out level.	Prior to building permit	City of Perris Public Works/Engineering Administration Division	Receipt of payment.

4.0 REVISED DRAFT EIR

Rados Distribution Center

Perris, California

DRAFT ENVIRONMENTAL IMPACT REPORT

SCH No. 2008111080

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March 2010

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- C. Air Quality Impact Analysis, Revised 2010
Health Risk Assessment, Revised 2010
- D. General Biological Resources Assessment, March 17, 2010
- E. Historical/Archaeological Resources Survey Report, Revised January 15, 2010
Paleontological Resources Assessment Report, April 2006
- F. Preliminary Geotechnical Investigation, January 14, 2003
- G. Phase I Environmental Site Assessment, December 23, 2002
Phase II Environmental Site Assessment, March 31, 2009
- H. Water Quality Management Plan, Preliminary, January 7, 2009
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1.0 EXECUTIVE SUMMARY

DOCUMENT PURPOSE

This Draft Environmental Impact Report (DEIR) has been prepared to inform decision-makers and the public of the potentially significant environmental effects associated with the project approvals for the Rados Distribution Center – Perris (project) in the City of Perris. This study has been prepared pursuant to the California Environmental Quality Act, known as CEQA, (California Public Resources Code, Sections 21000, et seq.) and the CEQA Guidelines (California Code of Regulations, Sections 15000, et seq.). The City of Perris is the lead agency under the CEQA and is responsible for the preparation of this DEIR.

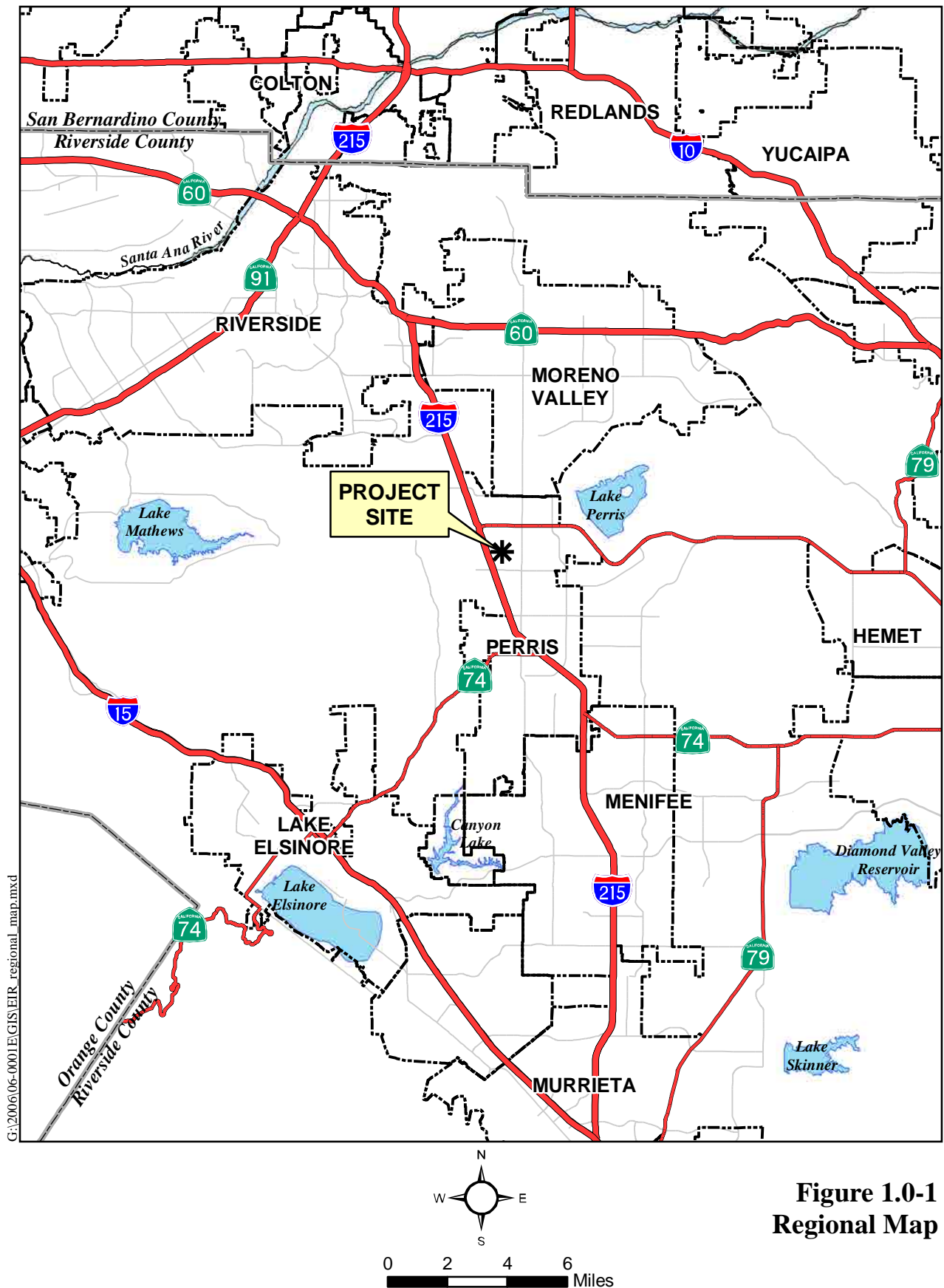
PROJECT LOCATION

The Rados Distribution Center – Perris project site is located in the city of Perris east of Interstate 215, as shown on **Figure 1.0-1, Regional Map**. The City of Moreno Valley is located north of the City of Perris, the City of Menifee is located to the south, and unincorporated Riverside County lands are located to the west and east of Perris. The City lies in the Perris Valley, a flat alluvial plain between the Santa Ana Mountains to the west and the San Jacinto Mountains to the east.

The project site is rectangular in shape and is bounded by Webster Avenue on the west, Rider Street on the south, and Indian Avenue on the east. (**Figure 1.0-2, Aerial View of Project Area**) The project site is also described as being located within Section 7, Township 4 South, Range 3 West, San Bernardino Base & Meridian, and is identified by the Riverside County Assessor Parcel Number (APN) 303-050-002 and the southern approximately 155 feet of APN 303-050-003. (Latitude/Longitude: 33° 50' 27" North/117° 13' 04" West) The 9.6-acre (155 feet by 2,700 feet) area along the northern boundary of the site is owned by the Metropolitan Water District (MWD) (APN 303-050-003).

The 61.63 gross-acre site is vacant land currently designated as Light Industrial in the City of Perris General Plan. The surrounding area was formerly agricultural but is transitioning into predominantly industrial uses. The project site consists mainly of leveled farmland, part of which was previously a sod farm. The project site is currently leased to a farmer who plants winter wheat and plows the weeds year round. Adjacent to the project site are agriculture fields to the east and northeast, a commercial site and vacant land to the west, and existing industrial development to the north and south. (**Figure 1.0-2**)

Access to the site is provided by Interstate 215 to the west. There are two existing freeway interchanges which will service the project site, one at the Ramona Expressway and Interstate 215, and one at Harley Knox Boulevard (formerly Oleander Avenue) and Interstate 215. These freeway interchanges are located approximately one mile and two miles northwest of the site, respectively.



**Figure 1.0-1
Regional Map**

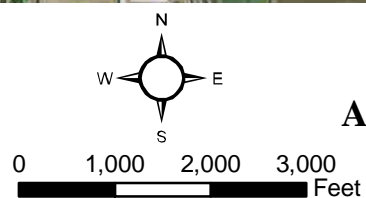
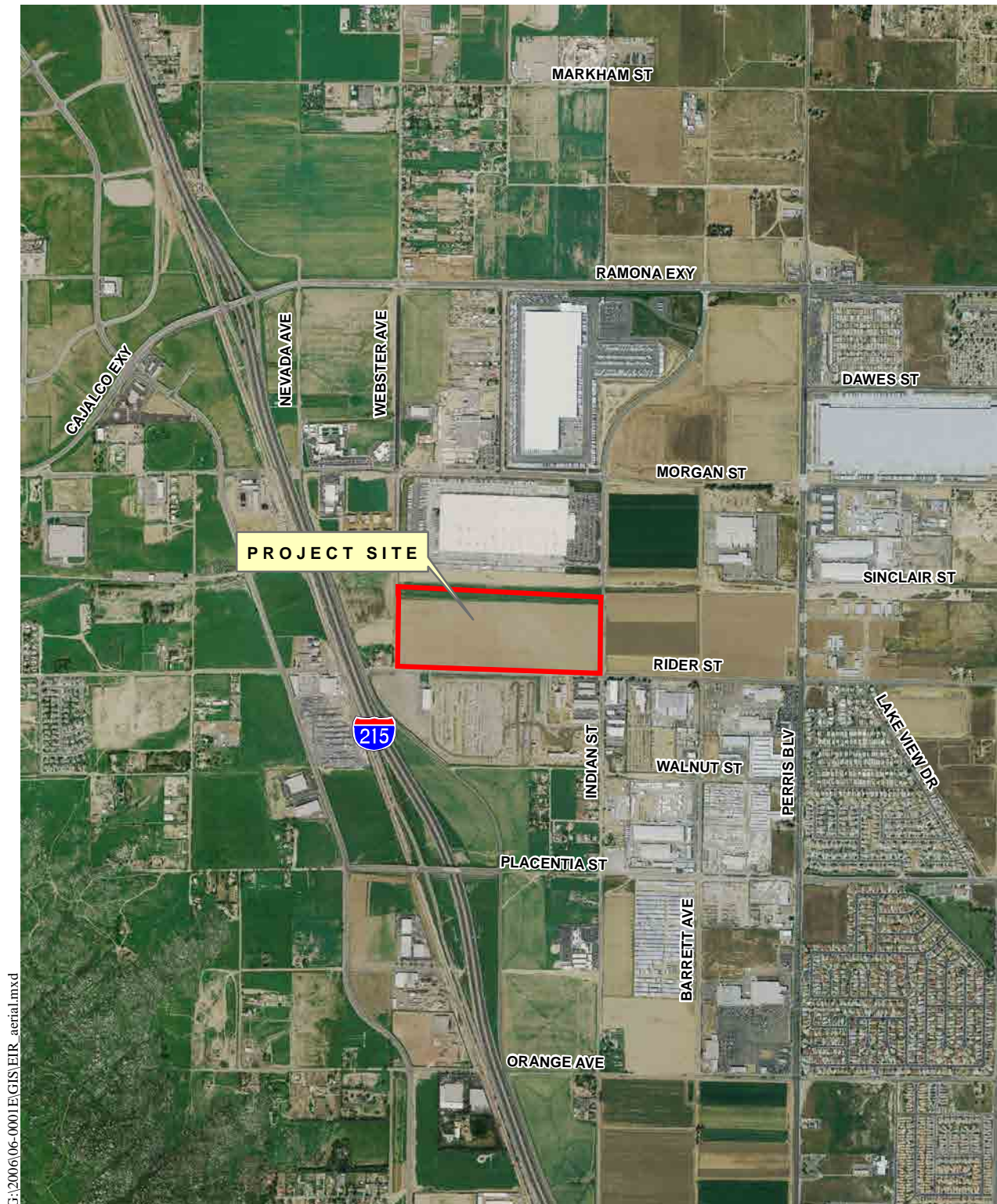


Figure 1.0-2
Aerial View of Project Area

PROJECT DESCRIPTION

The proposed project is an approximately 1,191,080 square-foot distribution center on approximately 61.63 gross acres. The project also includes approximately 720 standard parking spaces, 13 handicapped parking spaces and 353 trailer parking spaces. The MWD property would be leased for use as overflow parking (approximately 2.6 acres). (**Figure 1.0-3, Conceptual Site Plan**)

The proposed project includes the following land use applications: Zone Change 07-0117; Development Plan No. 07-0119; and Agricultural Diminishment 07-0118.

Zone Change No. 07-0117 (ZC 07-0117) is a proposal to change the zoning on the project site from A1 (Light Agriculture) to LI (Light Industrial).

Development Plan No. 07-0119 (DPR 07-0119) is an application to develop an approximately 1,191,080-square foot distribution center on approximately 61.63 gross acres. (**Figure 1.0-3**).

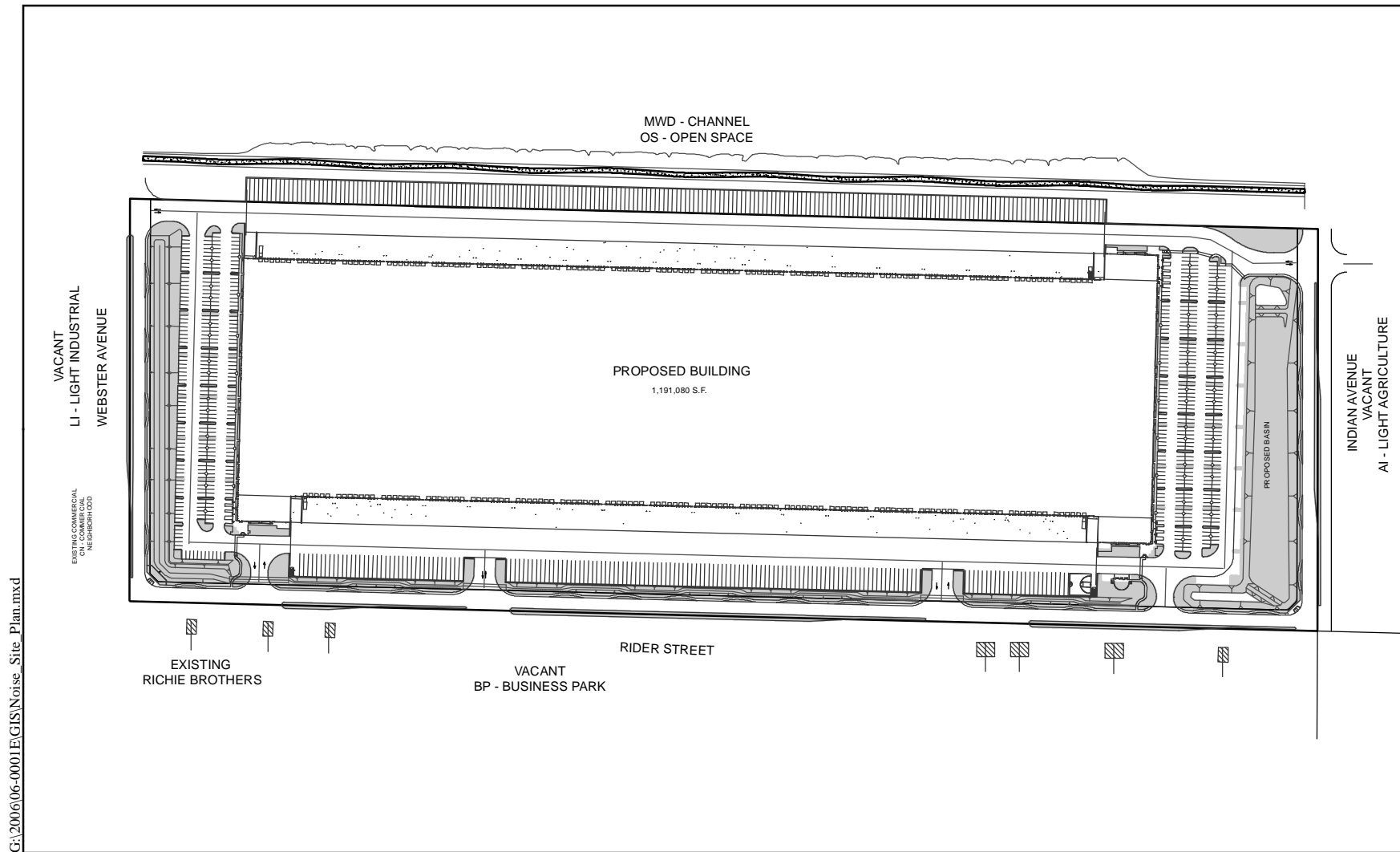
Agricultural Diminishment 07-0118 (AD 07-0118) proposes to remove the subject property from the Perris Valley Agricultural Preserve No. 1, Map No. 56.

The proposed project is speculative. Speculative development means the applicant is constructing the building which will then be sold to other individual businesses or companies to own. The applicant will not own or operate the businesses which will ultimately occupy the site. Therefore, the specific occupants or specific uses of these buildings are not known at this time.

Approximately 75,000 cubic yards of import soils are needed for grading the site. Approximately 171,000 cubic yards of cut/fill will be generated on site, as well. A borrow site will be utilized for the import of soil; and although a specific borrow site has not been identified for the proposed project at this time, it is expected that it will be within a 10-mile radius.

The proposed project may require utility services provided by these purveyors:

Purveyor	Type of Services
Eastern Municipal Water District	potable water, sewer
Verizon	telephone
Southern California Edison	electricity
Southern California Gas Company	natural gas
CR&R Waste Services	solid waste disposal



**Figure 1.0-3
Conceptual Site Plan**

Project Objectives

A clear statement of project objectives allows for the analysis of reasonable alternatives to the proposed project. A range of reasonable alternatives, both on and off site, that would feasibly attain most of the basic project objectives, while avoiding or substantially lessening the significant effects of the project, must be analyzed per CEQA Guidelines Section 15126.6. The Rados Distribution Center – Perris project will meet the following project objectives:

- Establish a modern, economically competitive distribution center to strengthen the City's economic viability by providing jobs;
- Implement the City of Perris General Plan land use designation of Light Industrial;
- Establish a modern, economically competitive distribution center to provide an expanded and diversified economic base for the City;
- Establish a modern, economically competitive distribution center near major transportation routes including freeways;
- Generate local tax revenue for the City of Perris and stimulate economic growth surrounding the project area; and
- Enhance image of the City of Perris by improving vacant property with a modern distribution center which is landscaped and provides improved roadways.

Discretionary Actions and Approvals

The DEIR serves as an informational document for use by public agencies, the general public, and decision makers. This DEIR discusses the impacts of development pursuant to the proposed project and related components and analyzes project alternatives. This DEIR will be used by the City of Perris and responsible agencies in assessing impacts of the proposed project.

The following public entities and/or agencies may use this DEIR when considering the project:

- **City of Perris Planning Commission**
 - a) Recommendation to the City of Perris City Council for Certification of the Final Environmental Impact Report for the project.
 - b) Recommendation to the City of Perris City Council regarding approval of Zone Change 07-0117 (ZC 07-0117) to change the zoning on the project site from A1 (Light Agriculture) to LI (Light Industrial).
 - c) Recommendation to the City of Perris City Council regarding approval of Development Plan Review 07-0119 (DPR 07-0119) for an approximately 1,191,080-square foot distribution center on approximately 61.63 gross acres.

- d) Recommendation to City of Perris City Council regarding approval of Agricultural Diminishment 07-0118 (AD 07-0118) to remove the subject property from the Perris Valley Agricultural Preserve No. 1, Map No. 56.

- **City of Perris City Council**

- a) Certification of the Final Environmental Impact Report.
- b) Approval of Zone Change 07-0117 to change the zoning on the project site from A1 (Light Agriculture) to LI (Light Industrial).
- c) Approval of Development Plan 07-0119 for an approximately 1,191,080-square foot distribution center, parking lot with detention basin, and connection to off-site water and sewer infrastructure on approximately 61.63 gross acres.
- d) Approval of Agricultural Diminishment 07-0118 (AD 07-0118) to remove the subject property from the Perris Valley Agricultural Preserve No. 1, Map No. 56.

Other actions and permits may be needed to implement this project, including:

- **California Department of Transportation (Caltrans)**

- a) Issuance of encroachment permits related to street improvements within their rights-of-way.

- **Eastern Municipal Water District**

- a) Approval and construction of infrastructure (water and sewer) improvements.

- **Regional Water Quality Control Board**

- a) Issuance of a National Pollutant Discharge Elimination System (NPDES) Construction Permit (Order No. 99-08-DWQ).

- **Riverside County Flood Control and Water Conservation District**

- a) Approval of hydrology/storm water drainage system.
- b) Provide the terms and conditions of design, construction, inspection, transfer of rights-of-way, project credit in lieu of charges and reimbursement schedule which may apply to Perris Valley Area Drainage Plan facilities constructed as part of this project.

Non-discretionary actions anticipated to be taken by the City at the Staff level as part of the proposed project include:

- Approval of a Storm Water Pollution Prevention Plan (SWPPP) to mitigate site runoff during construction.
- Approval of a Water Quality Management Plan (WQMP) to mitigate for post-construction runoff flows.

AREAS OF CONTROVERSY AND ISSUES TO BE RESOLVED

CEQA Guidelines Section 15123(b)(2) requires that areas of controversy known to the Lead Agency must be stated in the EIR summary. Issues of interest to the public and public agencies were identified during the 30-day public comment period of the Initial Study and Notice of Preparation (NOP), as well as comments received during the public scoping meeting that was held on December 3, 2008 for the proposed project at the City of Perris.

An NOP for the Draft EIR was distributed to state, regional, and local agencies on November 21, 2008, for a 30-day review period ending on December 22, 2008. The objective of distributing an NOP is to solicit public comment in order to identify and determine the full range and scope of issues of concern so that these issues might be fully examined in the DEIR. An Initial Study was distributed in tandem with the NOP. The Initial Study/NOP was distributed to the State Clearinghouse, as well as to the agencies, and organizations considered likely to be interested in the proposed project and its potential impacts. Comments received regarding the NOP were used to help identify impacts that could result from implementation of the proposed project.

The Initial Study, NOP, distribution list, and comment letters are included in Appendix A of the Draft EIR. By the close of the 30-day public review period, five responses to the NOP had been received. Four additional comments letters were received after the public review period and will be addressed in the Draft EIR. A summary of NOP comments has been included in Section 2.0 (Introduction).

Section 15123(b)(3) of the CEQA Guidelines requires that an DEIR identify issues to be resolved; this includes the choice among alternatives and whether or how to mitigate significant impacts. The major issues to be resolved for the proposed project include decisions by the City of Perris as to whether:

- this Draft EIR adequately describes the potential environmental impacts of the proposed project;
- the recommended mitigation measures should be adopted or modified;
- additional mitigation measures need to be applied;
- the project should or should not be approved as proposed; or
- the project should be modified based on the alternatives considered in this Draft EIR.

SUMMARY OF ENVIRONMENTAL IMPACTS

The following table, **Table 1.0-A, EIR Summary Matrix/Mitigation Monitoring Program**, provides a summary of impacts related to the proposed project. The table identifies significant environmental impacts resulting from the project pursuant to the CEQA Guidelines Section 15123(b)(1).

Table 1.0-A, EIR Summary Matrix/Mitigation Monitoring Program

Impact Category	Impact/Threshold	Mitigation Measure	Impact After Mitigation
Agricultural Resources	Convert prime farmland, unique farmland or farmland of statewide importance as shown on the maps prepared pursuant to farmland mapping and monitoring program of the California resource agency, to non-agricultural use.	No mitigation measures are proposed to reduce or eliminate this impact and a Statement of Overriding Consideration would be required prior to project approval.	Project Specific and Cumulative: Significant.
Agricultural Resources	Conflict with existing zoning for agricultural use, or a Williamson Act contract.	No mitigation required.	Project Specific and Cumulative: Less than significant impact.
Agricultural Resources	Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural uses.	No mitigation required.	Project Specific and Cumulative: Less than Significant.
Airport Hazards	Result in a safety hazard for people residing or working in the project area where located within an airport land use plan or, where such a plan has not been adopted, within two miles of public airport or public use airport.	<p>MM Airport 1: All street lights and other outdoor lighting shall be hooded or shielded to prevent either the spillage of lumens or reflection into the sky or above the horizontal plane.</p> <p>MM Airport 2: The following notice shall be provided to all potential purchasers and tenants:</p> <p>“This property is presently located in the vicinity of an airport, within what is known as an airport influence area. For that reason, the property may be subject to some of the annoyances or inconveniences associated with proximity to airport operations (for example, noise, vibration, or odors). Individual sensitivities to those annoyances can vary from person to person. You may wish to consider what airport annoyances, if any, are associated with the property before you complete your purchase and determine whether they are acceptable to you. Business & Profession Code 11010 12(A)”</p>	Project Specific and Cumulative: Less than significant after mitigation.

Table 1.0-A, EIR Summary Matrix/Mitigation Monitoring Program

Impact Category	Impact/Threshold	Mitigation Measure	Impact After Mitigation
		<p>MM Airport 3: The following uses shall be prohibited:</p> <p>(a) Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than an FAA-approved navigational signal light or visual approach slope indicator.</p> <p>(b) Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an aircraft engaged in a straight final approach towards a landing at an airport.</p> <p>(c) Any use which would generate smoke or water vapor or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area.</p> <p>(d) Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.</p> <p>MM Airport 4: Prior to recordation of a final map, issuance of building permits, or conveyance to an entity exempt from the Subdivision Map Act, whichever occurs first, the landowner shall convey an aviation easement to March Air Reserve Base.</p>	
Air Quality	Conflict with or obstruct implementation of the applicable air quality plan.	No mitigation required.	Project Specific and Cumulative: Less than significant impact.

Table 1.0-A, EIR Summary Matrix/Mitigation Monitoring Program

Impact Category	Impact/Threshold	Mitigation Measure	Impact After Mitigation
Air Quality	Violate any air quality standard or contribute substantially to an existing or projected air quality violation.	<p>MM Air 1 through MM Air 18 are proposed to reduce this impact; however a Statement of Overriding Consideration would be required prior to project approval.</p> <p><i>The following mitigation measures recommended by the 2004 City of Perris General Plan EIR shall be implemented in order to reduce emissions associated with project construction:</i></p> <p>MM Air 1: Electricity from permanent or temporary power poles shall be used instead of temporary diesel- or gasoline-powered generators to reduce the associated emissions.</p> <p>MM Air 2: All retail/commercial/industrial land uses shall apply paints using either high volume low pressure (HVLP) spray equipment with a minimum transfer efficiency of at least 50% or other application techniques with equivalent or higher transfer efficiency.</p> <p>MM Air 3: Prior to issuance of the grading permit(s), the applicant(s) shall submit a traffic control plan that will describe in detail safe detours and provide temporary traffic control during construction activities. To reduce traffic congestion, and therefore NO_x, the plan shall include, as necessary, appropriate, and practicable, the following: temporary traffic controls such as a flag person during all phases of construction to maintain smooth traffic flow, dedicated turn lanes for movement of construction trucks and equipment on- and off-site, scheduling of construction activities that affect traffic flow on the arterial system to off-peak hour, rerouting of construction trucks away from congested streets or sensitive receptors, and/or signal synchronization to improve traffic flow.</p>	Project Specific and Cumulative: Significant impact after mitigation.

Table 1.0-A, EIR Summary Matrix/Mitigation Monitoring Program

Impact Category	Impact/Threshold	Mitigation Measure	Impact After Mitigation
		<p><i>In addition to compliance with SCAQMD Rule 403 for construction of the project, the following mitigation measures shall be implemented:</i></p> <p>MM Air 4: During construction, all vehicles and equipment shall be properly maintained according to manufacturers' specifications at an offsite location, which includes proper tuning and timing of engines. Equipment maintenance records and equipment design specification data sheets shall be kept on site during construction.</p> <p>MM Air 5: The project developer shall require by contract specification that construction equipment used for construction meets or exceeds Tier 3 standards. Alternatively, all construction equipment shall be equipped with CARB-verified oxidation catalysts, diesel particulate traps or other verified or certified retrofit technologies with the greatest control efficiency for the specific category of equipment. Contract specifications shall be included in project construction documents, which shall be reviewed by the City of Perris prior to issuance of a grading permit.</p> <p>MM Air 6: All construction vehicles shall be prohibited from idling in excess of five minutes, both on site and off site.</p> <p>MM Air 7: Construction parking shall be configured to minimize traffic interference.</p> <p>MM Air 8: To reduce VOC emissions associated with architectural coating, the project designer and contractor shall reduce the use of paints and solvents by utilizing pre-coated materials (e.g. bathroom stall dividers, metal awnings), materials that do not require painting, and require</p>	

Table 1.0-A, EIR Summary Matrix/Mitigation Monitoring Program

Impact Category	Impact/Threshold	Mitigation Measure	Impact After Mitigation
		<p>coatings and solvents with a VOC content lower than required under Rule 1113 to be utilized. The construction contractor shall be required to utilize “Super-Compliant” VOC paints, which are defined in SCAQMD’s Rule 1113. Construction specifications shall be included in the building specifications that assure these requirements are implemented. The specifications shall be reviewed by the City of Perris’ Building Division for compliance with this mitigation measure prior to issuance of a building permit.</p> <p>MM Air 9: The developer shall comply with SCAQMD Rule 403. The developer shall provide the City of Perris with the SCAQMD-approved dust control plan, or other sufficient proof of compliance with Rule 403, prior to grading permit issuance.</p> <p><i>In order to reduce emissions related to diesel, VOC, and NO_x emissions from project operation, the following mitigation measures shall be implemented:</i></p> <p>MM Air 10: All vehicles shall be prohibited from idling in excess of five minutes.</p> <p>MM Air 11: Loading bays shall be equipped with electrification, and/or auxiliary power units.</p> <p>MM Air 12: Roads and parking areas shall be paved.</p> <p>MM Air 13: The project shall post contact information outside the facility for the public to call if a specific air quality issue arises.</p> <p>MM Air 14: The project shall provide information about diesel particulate traps and alternative fueled off-road</p>	

Table 1.0-A, EIR Summary Matrix/Mitigation Monitoring Program

Impact Category	Impact/Threshold	Mitigation Measure	Impact After Mitigation
		<p><u>equipment to all customers. In order to promote alternative fuels, and help support “clean” truck fleets, the developer/successor-in-interest shall provide building occupants and businesses with information related to SCAQMD’s Carl Moyer Program, or other state programs that provide funding for cleaner than required heavy-duty engines and emission control devices, such as 2007 or newer model year or 2010 compliant vehicles.</u></p> <p><u>MM Air 14a: Service equipment at the facility will be either low-emission propane powered or electric (i.e., forklifts).</u></p> <p><i>In order to reduce GHG emissions from operation of the entire project, the following mitigation measures shall be implemented:</i></p> <p>MM Air 15: The project shall be, at a minimum, required to increase building energy performance 14 percent beyond Title 24, and reduce water use by 20 percent. Prior to issuance of any building permits, building plans shall include proof of these reductions.</p> <p>MM Air 16: The project shall be required to use recycled materials for at least 15 percent of construction materials. Regional materials that are extracted, processed, and manufactured regionally will also be required to account for 10 percent of the project.</p> <p>MM Air 17: The project shall be required to recycle and/or salvage at least 75 percent of non-hazardous construction and demolition debris by weight and volume.</p>	

Table 1.0-A, EIR Summary Matrix/Mitigation Monitoring Program

Impact Category	Impact/Threshold	Mitigation Measure	Impact After Mitigation
		MM Air 18: In order to reduce energy consumption from the proposed project development, applicable plans (e.g., electrical plans, improvement maps, etc.) submitted to the City shall include the installation of energy-efficient street lighting throughout the project site. These plans shall be reviewed and approved by the applicable City Department (e.g., Building Division or Department of Public Works/Engineering) prior to conveyance of applicable streets.	
Air Quality	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).	MM Air 1 through MM Air 18 , above, are proposed to reduce this impact; however a Statement of Overriding Consideration would be required prior to project approval.	Cumulative: Significant after mitigation.
Air Quality	Exposing sensitive receptors to substantial pollutant concentrations.	No mitigation required.	Project Specific and Cumulative: Less than significant impact.
Air Quality	Create objectionable odors affecting a substantial number of people.	No mitigation required.	Project Specific and Cumulative: Less than significant impact.
Biological Resources	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.	MM Bio 1: A pre-construction survey for resident burrowing owls will be conducted by a qualified biologist no more than 30 days prior to commencement of grading and construction activities within those portions of the project site containing suitable burrowing owl habitat. The time lapse between surveys and site disturbance should not exceed 30 days. Additional surveys are necessary when the	Project Specific and Cumulative: Less than significant impact after mitigation.

Table 1.0-A, EIR Summary Matrix/Mitigation Monitoring Program

Impact Category	Impact/Threshold	Mitigation Measure	Impact After Mitigation
		<p>initial disturbance is followed by periods of inactivity or the development is phased spatially and/or temporally over the project site. Burrowing Owl surveys will be conducted in accordance with the methodologies prescribed by CDFG in their 1995 Staff Report and the Burrowing Owl Consortium in their 1993 Burrowing Owl Survey Protocol and Mitigation Guidelines.</p> <p>If active nests are identified on site during the pre-construction survey, they shall be avoided or the owls actively or passively relocated. To adequately avoid active nests, no grading or heavy equipment activity shall take place within at least 250 feet of an active nest during the breeding season (February 1 through August 31), and 160 feet during the non-breeding season.</p> <p>If burrowing owls occupy the site and cannot be avoided, active or passive relocation shall be used to exclude owls from their burrows, as agreed to by the City of Perris Planning Department and the California Department of Fish and Game. Relocation shall be conducted outside the breeding season or once the young are able to leave the nest and fly. Passive relocation is the exclusion of owls from their burrows (outside the breeding season or once the young are able to leave the nest and fly) by installing one-way doors in burrow entrances. These one-way doors allow the owl to exit the burrow, but not enter it. These doors shall be left in place 48 hours to ensure owls have left the burrow. Artificial burrows shall be provided nearby. The project area shall be monitored daily for one week to confirm owl use of burrows before excavating burrows in the impact area. Burrows shall be excavated using hand tools and refilled to prevent reoccupation. Sections of flexible pipe shall be inserted into the tunnels during</p>	

Table 1.0-A, EIR Summary Matrix/Mitigation Monitoring Program

Impact Category	Impact/Threshold	Mitigation Measure	Impact After Mitigation
		<p>excavation to maintain an escape route for any animals inside the burrow. The CDFG shall be consulted prior to any active relocation to determine acceptable receiving sites available where this species has a greater chance of successful long-term relocation.</p> <p>MM Bio 2: In order to avoid violation of the MBTA and California Fish and Game Code site-preparation activities (removal of trees and vegetation) shall be avoided, to the greatest extent possible, during the nesting season (generally February 1 to August 31) of potentially occurring native and migratory bird species. If site preparation activities are proposed during the nesting/breeding season (February 1 to August 31), a pre-activity field survey shall be conducted by a qualified biologist to determine if active nests of species protected by the Migratory Bird Treaty Act (MBTA) or the California Fish and Game Code are present in the construction zone. If active nests are not located within the project area and appropriate buffer, construction may be conducted during the nesting/breeding season. However, if active nests are located during the pre-activity field survey, no grading or heavy equipment activity shall take place within at least 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected (under MBTA or California Fish and Game Code) bird nests (non-listed), or within 100 feet of sensitive or protected songbird nests until the nest is no longer active.</p> <p>MM Bio 3: The purpose of the MSHCP is to conserve open space and habitat on a county-wide, cumulative basis. Potential impacts to the SKR are mitigated on a regional basis through compliance the SKR HCP mitigation fees. To address the impacts associated with the cumulative loss of</p>	

Table 1.0-A, EIR Summary Matrix/Mitigation Monitoring Program

Impact Category	Impact/Threshold	Mitigation Measure	Impact After Mitigation
		habitat for special status species, the proposed project shall be conditioned to pay the MSHCP mitigation fees as set forth under Ordinance No. 1123 and the City of Perris' Stephens' Kangaroo Rat mitigation fees as set forth under Ordinance No. 794.	
Biological Resources	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	No mitigation required.	Project Specific and Cumulative: Less than significant impact.
Biological Resources	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.	No mitigation required.	Project Specific and Cumulative: Less than significant impact.
Biological Resources	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 mitigation required.	Project Specific and Cumulative: Less than significant impact.
Cultural Resources	The project would cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the CEQA Guidelines.	No mitigation required.	Project Specific and Cumulative: Less than significant impact.
Cultural Resources	The project would cause a substantial adverse change in the significance of an archeological resource pursuant to Section 15064.5 of the CEQA Guidelines.	MM Cultural 1: Prior to grading of the project site, the project developer shall hire a qualified archaeologist to provide cultural resource monitoring services at the project site. Selection of the archaeologist shall be subject to the	Project Specific and Cumulative: Less than

Table 1.0-A, EIR Summary Matrix/Mitigation Monitoring Program

Impact Category	Impact/Threshold	Mitigation Measure	Impact After Mitigation
		approval of the City of Perris Planning Manager and no grading activities shall occur at the site until the archaeologist has been approved by the City. During grading activities, the archaeologist shall monitor earthmoving activities at the project site consistent with Public Resources Code Section 21083.2(b), (c), and (d). The archaeologist shall be equipped to record and salvage cultural resources that may be unearthed during grading activities. The archaeologist shall be empowered to temporarily halt or divert grading equipment to allow recording and removal of the unearthed resources. If the archaeologist identifies resources of a prehistoric or Native American origin, a Native American observer shall be added to the monitoring program and accompany the archaeologist for the duration of the grading phase. Any Native American resources shall be evaluated in accordance with the CEQA Guidelines and either reburied at the project site or curated at an accredited facility approved by the City of Perris. Once grading activities have ceased or the archaeologist determines that monitoring is no longer necessary, monitoring activities can be discontinued.	significant impact with mitigation.
Cultural Resources	The project would disturb any human remains, including those interred outside of formal cemeteries.	MM Cultural 3: If human remains are uncovered at any time, all activities in the area of the find shall be halted by the developer or its contractor and the County Coroner shall be notified immediately pursuant to CA Health & Safety Code Section 7050.5 and CA PRC Section 5097.98. If the Coroner determines that the remains are of Native American origin, the Coroner shall proceed as directed in Section 15064.5(e) of the CEQA Guidelines.	Project Specific and Cumulative: Less than significant impact with mitigation.
Cultural Resources	The project would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	MM Cultural 2: Prior to the issuance of grading permits, a qualified paleontologist shall be retained to develop a paleontological resources monitoring and treatment plan (PRMTP) in accordance with the provisions of CEQA as well as the proposed guidelines of the Society of Vertebrate	Project Specific and Cumulative: Less than significant

Table 1.0-A, EIR Summary Matrix/Mitigation Monitoring Program

Impact Category	Impact/Threshold	Mitigation Measure	Impact After Mitigation
		<p>Paleontology, and shall include, but not be limited to the following:</p> <ol style="list-style-type: none"> 1. The excavation of areas identified as likely to contain paleontological resources shall be monitored by a full-time qualified paleontological monitor. Monitoring shall be restricted to undisturbed subsurface areas of older alluvium, which might be present below the surface. The monitor shall be prepared to quickly salvage fossils as they are unearthed to avoid construction delays. The monitor shall also remove samples of sediments which are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor must have the power to temporarily halt or divert grading equipment to allow for removal of abundant or large specimens. 2. Collected samples of sediments shall be washed to recover small invertebrate and vertebrate fossils. Recovered specimens shall be prepared so that they can be identified and permanently preserved. 3. Specimens shall be identified and curated, and placed into a repository (such as the Western Science Center or the Riverside Metropolitan Museum) with permanent curation and retrievable storage. 4. A report of findings, including an itemized inventory of recovered specimens, shall be prepared upon completion of the steps outlined above. The report shall include a discussion of the significance of all recovered specimens. The 	<p>impact with mitigation.</p>

Table 1.0-A, EIR Summary Matrix/Mitigation Monitoring Program

Impact Category	Impact/Threshold	Mitigation Measure	Impact After Mitigation
		report and inventory, when submitted to the City of Perris Planning Division, will signify completion of the program to mitigate impacts to paleontological resources.	
Geology/Soils	Expose people or structures to potential substantial adverse effect, including the risk of loss, injury, or death involving strong seismic ground shaking and seismic-related ground failure, including liquefaction.	No mitigation required.	Project Specific and Cumulative: Less than significant impact.
Hazards	The project would be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.	No mitigation required.	Project Specific and Cumulative: Less than significant impact.
Hydrology/Water Quality	Violate any water quality standards or waste discharge requirements.	No mitigation required.	Project Specific and Cumulative: Less than significant impact.
Hydrology/Water Quality	Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.	No mitigation required.	Project Specific and Cumulative: Less than significant impact.
Hydrology/Water Quality	Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.	No mitigation required.	Project Specific and Cumulative: Less than significant

Table 1.0-A, EIR Summary Matrix/Mitigation Monitoring Program

Impact Category	Impact/Threshold	Mitigation Measure	Impact After Mitigation
			impact.
Hydrology/Water Quality	Substantially degrade water quality.	No mitigation required.	Project Specific and Cumulative: Less than significant impact.
Hydrology/Water Quality	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site.	No mitigation required.	Project Specific and Cumulative: Less than significant impact.
Hydrology/Water Quality	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.	No mitigation required.	Project Specific and Cumulative: Less than significant impact.
Land Use/Planning	Conflict with applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinances) adopted for the purpose of avoiding or mitigation an environmental effect.	No mitigation required.	Project Specific and Cumulative: Less than significant impact.
Noise	Result in exposure of people to severe noise levels in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies.	No mitigation required.	Project Specific and Cumulative: Less than significant impact.
Noise	Result in the exposure of persons to or generation of excessive ground-born vibration or ground-born noise	No mitigation required.	Project Specific and

Table 1.0-A, EIR Summary Matrix/Mitigation Monitoring Program

Impact Category	Impact/Threshold	Mitigation Measure	Impact After Mitigation
	levels.		Cumulative: Less than significant impact.
Noise	Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.	No mitigation required.	Project Specific and Cumulative: Less than significant impact.
Noise	Result in substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.	No mitigation required.	Project Specific and Cumulative: Less than significant impact.
Noise	Result in exposure of people residing or working in the project area to excessive noise levels from airport noise.	No mitigation required.	Project Specific and Cumulative: Less than significant impact.
Solid Waste	Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs.	No mitigation required.	Project Specific and Cumulative: Less than significant impact.
Transportation	Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system, or exceed, either individually or cumulatively, a level of service standard established by the city/county congestion management agency for designated roads or highways.	Based upon the traffic study, the following improvements will substantially lessen traffic impacts attributable to the project and other area-wide growth. MM Trans 1: Indian Avenue shall be improved to its full street right-of-way to the center lane, plus 15 feet where it	Project Specific and Cumulative: Less than significant impact with

Table 1.0-A, EIR Summary Matrix/Mitigation Monitoring Program

Impact Category	Impact/Threshold	Mitigation Measure	Impact After Mitigation
		<p>fronts the project site.</p> <p>MM Trans 2: Indian Avenue shall be constructed as a 42-foot pilot road from the northern edge of the project site to Harley Knox Boulevard.</p> <p>MM Trans 3: Webster Avenue shall be improved to its full street right-of-way to the center lane, plus 15 feet where it fronts the project site.</p> <p>MM Trans 4: Rider Street shall be improved to its full street right-of-way to the center lane, plus 15 feet where it fronts the project site, eastward to Perris Boulevard.</p> <p>MM Trans 5: Sight distance at the project entrance roadway shall be reviewed with respect to standard City of Perris sight distance standards at the time of preparation of final grading, landscape and street improvement plans.</p> <p>MM Trans 6: The proposed project shall participate in the phased construction of off-site traffic signals through payment of the project's fair share of traffic signal mitigation fees.</p> <p>MM Trans 7: Signing/striping shall be implemented in conjunction with detailed construction plans for the project site.</p> <p>Mitigation Measures MM Trans 8 through MM Trans 15 will be constructed by the developer of the proposed project prior to the issuance of occupancy permits, except where said improvements have previously been constructed.</p> <p>MM Trans 8: Construct the intersection of Indian Avenue</p>	mitigation.

Table 1.0-A, EIR Summary Matrix/Mitigation Monitoring Program

Impact Category	Impact/Threshold	Mitigation Measure	Impact After Mitigation
		<p>and Project Driveway to include the following geometrics:</p> <p>Northbound: One left turn lane. One shared through and right turn lane.</p> <p>Southbound: One left turn lane. One shared through and right turn lane.</p> <p>Eastbound: One shared left turn, through, and right turn lane. Stop controlled.</p> <p>Westbound: One shared left turn, through, and right turn lane. Stop controlled.</p> <p>MM Trans 9: Modify the intersection of Indian Avenue and Rider Street to include the following geometrics:</p> <p>Northbound: One left turn lane. One shared through and right turn lane. Stop controlled.</p> <p>Southbound: One left turn lane. One shared through and right turn lane. Stop controlled.</p> <p>Eastbound: One left turn lane. One shared through and right turn lane. Stop controlled.</p> <p>Westbound: One left turn lane. One shared through and right turn lane. Stop controlled.</p> <p>MM Trans 10: Construct the intersection of Car Driveway East and Rider Street to restrict movement to right-in and right-out only from the driveway with the following geometrics:</p> <p>Northbound: Not Applicable.</p> <p>Southbound: One right turn lane. Stop controlled.</p> <p>Eastbound: One through lane.</p> <p>Westbound: One shared through and right turn lane.</p> <p>MM Trans 11: Construct the intersection of Truck Driveway East and Rider Street to include the following</p>	

Table 1.0-A, EIR Summary Matrix/Mitigation Monitoring Program

Impact Category	Impact/Threshold	Mitigation Measure	Impact After Mitigation
		<p>geometrics:</p> <p>Northbound: Not Applicable.</p> <p>Southbound: One shared left turn and right turn lane. Stop controlled.</p> <p>Eastbound: One left turn lane. One through lane.</p> <p>Westbound: One shared through and right turn lane.</p> <p>MM Trans 12: Construct the intersection of Truck Driveway West and Rider Street to include the following geometrics:</p> <p>Northbound: Not Applicable.</p> <p>Southbound: One shared left turn and right turn lane. Stop controlled.</p> <p>Eastbound: One left turn lane. One through lane.</p> <p>Westbound: One shared through and right turn lane.</p> <p>MM Trans 13: Construct the intersection of Car Driveway West and Rider Street to include the following geometrics:</p> <p>Northbound: Not Applicable.</p> <p>Southbound: One shared left turn right turn lane. Stop controlled.</p> <p>Eastbound: One shared left turn through lane.</p> <p>Westbound: One shared through and right turn lane.</p> <p>MM Trans 14: Construct the intersection of Webster Avenue and Rider Street to include the following geometrics:</p> <p>Northbound: Not Applicable.</p> <p>Southbound: One left turn lane. One right turn lane. Stop controlled.</p> <p>Eastbound: One left turn lane. One through lane.</p>	

Table 1.0-A, EIR Summary Matrix/Mitigation Monitoring Program

Impact Category	Impact/Threshold	Mitigation Measure	Impact After Mitigation
		<p>Westbound: One shared through and right turn lane.</p> <p>MM Trans 15: Construct the intersection of Webster Avenue and Project Driveway to include the following geometrics:</p> <p>Northbound: One shared through and right turn lane. Southbound: One shared left turn and through lane. Eastbound: Not Applicable. Westbound: One shared left turn and right turn lane. Stop controlled.</p> <p>MM Trans 16: The project shall participate in the cost of off-site improvements through payment of the fair share mitigation fees. These fees shall be collected and utilized as needed by the City of Perris to construct the improvements necessary to maintain the required level of service and build roads to the general plan build-out level.</p>	
Transportation	The project would conflict with adopted policies, plans or programs supporting alternative transportation.	No mitigation required.	Project Specific and Cumulative: Less than significant impact.
Water and Sewer	Require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects.	No mitigation required.	Project Specific and Cumulative: Less than significant impact.
Water and Sewer	Have insufficient water supplies available to serve the project from existing entitlements and resources, or require	No mitigation required.	Project Specific and

Table 1.0-A, EIR Summary Matrix/Mitigation Monitoring Program

Impact Category	Impact/Threshold	Mitigation Measure	Impact After Mitigation
	new or expanded entitlements.		Cumulative: Less than significant impact.
Water and Sewer	Require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, the construction of which would cause significant environmental effects.	No mitigation required.	Project Specific and Cumulative: Less than significant impact.
Water and Sewer	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.	No mitigation required.	Project Specific and Cumulative: Less than significant impact.

SUMMARY OF PROJECT ALTERNATIVES

The CEQA Guidelines, Section 15126.6, identify the parameters within which consideration and discussion of alternatives to the proposed project should occur. As stated in this section of the guidelines, alternatives must focus on those that are reasonably feasible and which attain most of the basic objectives of the project. Each alternative must be capable of avoiding or substantially lessening any significant effects of the proposed project. The rationale for selecting the alternatives to be evaluated and a discussion of the "no project" alternative are also required, per Section 15126.6.

Any alternatives which considered different land uses, such as residential, were rejected as infeasible because the City's General Plan and zoning designate the project site as industrial and agricultural uses, respectively and said uses would not meet most of the project's objectives. The surrounding area is also designated for industrial uses and has associated truck traffic. Therefore, residential uses were not considered to be feasible.

The project, as proposed, is anticipated to result in unavoidable adverse impacts related to agricultural resources and air quality. Agricultural impacts result from the conversion of the site to non-agricultural uses. Anticipated impacts to air quality by the proposed project will be a result of the additional vehicles within the project area and the truck traffic using the site generating emissions. Given the nature of the proposed development, an alternative location will not alleviate these impacts, as it will merely shift the impacts to another location, not reduce or eliminate them. The location of the project is appropriate because the use proposed is: 1) consistent with the site's general plan designation, 2) in close proximity to MARB runways, and 3) is near a freeway. Therefore, an alternative location is not considered a feasible alternative to the proposed project.

This DEIR evaluates 1) a No Project Alternative that retains existing use of the site for agricultural purposes, 2) a Reduced Square Footage alternative, and 3) a Business Park alternative representing another use allowed under the current General Plan land use designation.

Table 1.0-B, Impact Comparison of Alternatives Matrix, gives a summary of all project alternatives considered in detail in the EIR and identifies the areas of potential environmental effects per CEQA and ranks each alternative as better, the same or worse than the proposed project with respect to each area.

Table 1.0-B
Impact Comparison of Alternatives Matrix

Environmental Issue	Proposed Project Rados Distribution Center – Perris	Alternative 1 No Project	Alternative 2 Reduced Square Footage	Alternative 3 Business Park
Agricultural Resources	Significant – Loss of 61.63 acres of farmland. Cumulatively significant – Contributes to area wide loss of farmland.	Better – No loss of farmland. No significant impact.	Same – Loss of 61.63 acres of farmland. Cumulatively significant- Contributes to area wide loss of farmland.	Same – Loss of 61.63 acres of farmland. Cumulatively significant- Contributes to area wide loss of farmland.
Airports	No significant impact, with mitigation.	Better – No impact.	Same – No significant impact, with mitigation.	Same – No significant impact, with mitigation.
Air Quality	Significant – Will exceed SCAQMD short-term and long-term thresholds for criteria pollutants. Cumulatively significant - contributes to exceedance of air quality standards which the Basin is non-attainment. GHG emissions were found to be potentially cumulatively considerable after mitigation in the absence of regulatory thresholds.	Better – Minimal impacts to air quality. No significant impact.	Better – Although reduced building square footage reduces the amount of trips from vehicles related to the project, and emissions would be reduced, there would still be a net increase in emissions, and cumulative impacts related to emissions released in an area that already experiences problems regarding air quality. Cumulatively significant - contributes to exceedance of air quality standards. This alternative in combination with statewide, national, and international emissions could cumulatively contribute to a change in Earth's climate, i.e., global warming.	Worse – This alternative creates more daily trips which increase air pollution in general and GHG emissions, but significantly reduces the amount of truck traffic compared to the project. The reduction in trucks corresponds to reduced impacts related to cumulative health risks when compared to the proposed project's less than significant health risks from diesel truck emissions.
Biological Resources	Less than significant project impacts of natural habitat/open	Better – No loss of 62 acres to development.	Same – This alternative would result in the same loss of open	Same – This alternative would have the same overall loss of

Table 1.0-B
Impact Comparison of Alternatives Matrix

Environmental Issue	Proposed Project Rados Distribution Center – Perris	Alternative 1 No Project	Alternative 2 Reduced Square Footage	Alternative 3 Business Park
	area. Project does not conflict with the MSHCP.		space and habitat. Loss of open area under this Alternative would also be consistent with the MSHCP.	open space, although more landscaping would be provided. This alternative would also be consistent with the MSHCP.
Cultural Resources	Less than significant impacts to cultural resources with mitigation measures incorporated.	Better – Although the site is not expected to harbor significant cultural resources, under this alternative there would not be the prospect of uncovering unknown resources, as no development would be proposed.	Same – This alternative would have the same less than significant impacts, with implementation of the same mitigation measures identified for the proposed project.	Same – This alternative would have the same less than significant impacts, with implementation of the same mitigation measures identified for the proposed project.
Geology and Soils	Less than significant impacts related to seismic shaking and ground failure without mitigation measures incorporated.	Same – No impact.	Same – This alternative would have the same less than significant impacts as the proposed project.	Same – This alternative would have the same less than significant impacts as the proposed project.
Hazards and Hazardous Materials	Less than significant impacts. The project is not located on a hazardous material site pursuant to Government Code Section 65962.5.	Same – No impact due to site characteristics.	Same – No impact due to site characteristics.	Same – No impact due to site characteristics.
Hydrology and Water Quality	Less than significant project impacts with implementation of WQMP and NPDES permit requirements. Project also includes a detention basin as part of the project which reduces impacts to water quality and flooding.	Better for Water Quality – The project site is currently vacant and used for agricultural uses. The undeveloped, unpaved nature of the site provides for infiltration of pollutants and so this Alternative would have better water quality impacts	Same – Less than significant project impacts. Although there would be less square footage and therefore less impermeable surfaces, development under this Alternative would result in some amount of increased runoff and associated pollution. This Alternative would still	Same – Less than significant project impacts. Although there would be less square footage and therefore less impermeable surfaces, development under this Alternative would result in some amount of increased runoff and associated pollution. This Alternative would still

Table 1.0-B
Impact Comparison of Alternatives Matrix

Environmental Issue	Proposed Project Rados Distribution Center – Perris	Alternative 1 No Project	Alternative 2 Reduced Square Footage	Alternative 3 Business Park
		than the proposed project. Worse for Hydrology – No flood control aspect would be implemented, and during heavy storm events, sheet flow conditions would continue under the current conditions which does not include storm drain/detention infrastructure.	include an on-site detention basin to address the water quality and flood control needs of the development.	include an on-site detention basin to address the water quality and flood control needs of the development.
Land Use and Planning	Consistent with General Plan land use designation and the goals for Planning Area 3 by converting agricultural land to a light industrial uses.	Worse – Without the project, development as anticipated by the City of Perris would not occur.	Same – A less intensive industrial use on the subject site would still be consistent with the City of Perris General Plan land use and policies.	Same – A Business Park on the subject site would still be consistent with the City of Perris General Plan land use and policies.
Noise	Less than significant impacts. The proposed project will create construction and operational noise from increased vehicular traffic, but will not exceed noise standards.	Better – Without project development, there is no short term construction-related noise impacts and no overall increase in traffic noise.	Better – Reduction in the square footage of the buildings would reduce the number of vehicles generated by the proposed project and would reduce the amount of noise generated by those vehicles.	Worse – This alternative increases the overall number of vehicles and the amount of noise generated by those vehicles.
Solid Waste	Less than significant project impacts on solid waste generation.	Better – Will not result in increases in solid waste amounts.	Better – Will generate fewer tons of solid waste annually.	Same – Will result in some amount of increased solid waste annually.
Transportation/ Traffic	Less than significant project impacts with incorporated mitigation measures.	Better – No increase in project-related traffic, however, key roadway improvements would not be provided to the City.	Better – Reduction in the square footage of the project buildings would result in a reduction of project-generated traffic.	Worse – This alternative would create more daily trips compared to the project, which translates to more traffic impacts to local roadways.

Table 1.0-B
Impact Comparison of Alternatives Matrix

Environmental Issue	Proposed Project Rados Distribution Center – Perris	Alternative 1 No Project	Alternative 2 Reduced Square Footage	Alternative 3 Business Park
Water and Sewer	Less than significant project impacts. The design of the proposed project and existing utility capabilities would not result in any significant utility impacts.	Better – No development eliminates the need to install any sewer/water facilities and eliminates any potential utility impacts.	Same – Project would still require installation of sewer/water facilities, however the reduced square footage of buildings may mean that slightly less water is required than the proposed project.	Same – Project would still require installation of sewer/water facilities, however the reduced square footage of buildings may mean that slightly less water is required than the proposed project.
Environmentally Superior to Proposed Project?	N/A	Yes	Yes	No
Meets Project Objectives?	Yes	No	Yes	Yes

The CEQA Guidelines, Section 15126.6(e)(2), requires the identification of the environmentally superior alternative. Of the alternatives evaluated above, the No Project (Existing Land Use) alternative is the environmentally superior alternative with respect to reducing impacts created by the proposed project. The CEQA Guidelines also require the identification of another environmentally superior alternative if the No Project alternative is the environmentally superior alternative.

Since the No Project alternative cannot be the “environmentally superior alternative.” Alternative 2 becomes the environmentally superior alternative over the proposed project. This alternative would reduce the square footage of proposed distribution buildings uses by 20 percent. Although the overall square footage of the project could be reduced, not all aspects of development would be reduced equally as a result. Implementation of this alternative would result in a volume reduction of project-generated traffic. The reduced traffic would result in slightly lesser noise impacts, by reducing the amount of vehicle traffic noise, and reduced air quality impacts. However, air quality impacts will not be sufficiently reduced to eliminate significant impact findings. Impacts related to biological, cultural, geology, hazards, hydrology, land use, and utilities (water, sewer, and solid waste) would essentially stay the same as the proposed project.

Regarding the ability of the Alternatives discussed above to meet project objectives, Alternative 2 will not be as economically competitive and more likely not as economically viable for the applicant to propose. Alternative 2’s reduction in the number of vehicles makes it environmentally superior over the proposed project, but it will result in less revenue and thus less tax revenue and fewer jobs to the City. Thus, while the larger project may result in some incrementally more concentrated impacts at and around this project site, overall it would result in fewer cumulative impacts.

2.0 INTRODUCTION

This DEIR assesses the potential environmental effects of the Rados Distribution Center – Perris (project), which is proposed by the Rados Companies within the City of Perris. The proposed project would be located within Planning Area 3: Agricultural Conversion Area as designated by the City of Perris General Plan, contributing to the planned economic development for the City of Perris by creating jobs, increasing the total disposable income in the area, generating tax revenue, and stimulating other economic growth in and around the City. The City of Perris is the Lead Agency under CEQA for this project pursuant to Sections 15051 and 15367 of the CEQA Guidelines, and will use this document to objectively review and assess the proposed project prior to approving or disapproving the project.

BACKGROUND

With new housing units being added to it, the City of Perris recognizes the need for additional jobs and increased tax revenues. The City of Perris General Plan recognizes the opportunity for increasing City revenues through land planning by using the distribution and location of land use designations to expand the variety of goods and services available to residents. The City also recognizes the opportunity to develop vacant and/or undeveloped land in order to evolve as a balanced city.

The intentions of CEQA are to: (1) inform governmental decision-makers and the public about the potentially significant environmental effects of proposed activities; (2) identify the ways that environmental damage can be avoided or significantly reduced; (3) prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and (4) disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose, if significant environmental effects are involved (CEQA Guidelines, Section 15002).

PURPOSE AND SCOPE

The purpose of this DEIR is to evaluate potential environmental impacts resulting from the implementation of the Rados Distribution Center – Perris project which includes Development Plan 07-0119, Zone Change 07-0117, and Agricultural Diminishment 07-0118, which are proposed by the Rados Companies within the City of Perris.

The City of Perris is the Lead Agency under CEQA and is responsible for the preparation of this DEIR. This DEIR is an informational document intended for use by the City of Perris, decision makers, and members of the general public in evaluating the potential environmental effects associated with the proposed warehouse/distribution project. This study has been prepared pursuant to the CEQA Guidelines, and the rules, regulations, and procedures for implementing CEQA as adopted by the City.

COMPLIANCE WITH CEQA

Format

Section 1.0 of this document covers the summary requirements of CEQA as required by Section 15123 of the CEQA Guidelines. Section 1.0 also covers the project description requirements of CEQA by discussing the project location, the project objectives, a general description of the project's environmental setting, and a statement of document purpose and intended use.

Issues identified in the Initial Study prepared by the City of Perris for the proposed project are discussed in Sections 4.0 and 5.0 of this document, which has been formatted to address the following general topics: Environmental Impact Analysis, Consistency with Regional Plans, and Mandatory CEQA Topics. Under each issue, an analysis is performed to determine the amount and degree of impact that is associated with the project. For all significant environmental impacts, mitigation measures, where feasible, are implemented in order to reduce the impact to a level below significant or to the maximum extent feasible.

The analysis of impacts and identification of mitigation measures is derived from technical reports which are included as technical appendices to this DEIR and from other informational resources as listed in Section 6.0, References.

Environmental Procedures

The EIR process typically consists of three parts – the Notice of Preparation (including the Initial Study), Draft EIR, and Final EIR. Pursuant to Section 15063 of the CEQA Guidelines, the City of Perris prepared an Initial Study (Environmental Assessment) for the project in order to determine if the project may have a significant effect on the environment. Based upon the findings of fact contained within the Initial Study, the City concluded that an EIR should be prepared. A Notice of Preparation (NOP) for an EIR and a description of potential adverse impacts were distributed to the State Clearinghouse, responsible agencies, and other interested parties on or about November 21, 2008. A notice advising of the availability of the NOP was posted by the Riverside County Clerk on November 24, 2008. Pursuant to Section 15082 of the CEQA Guidelines, recipients of the NOP were requested to provide responses within 30 days after their receipt of the NOP. Copies of the NOP (including the Initial Study) and the NOP distribution list are located in Appendix A to this DEIR. Copies of comments regarding the NOP, received by the City, are also included in Appendix A. A scoping meeting was held on December 3, 2008 before the City of Perris Planning Commission pursuant to the requirements of Section 15082(c)(1) of the CEQA Guidelines.

The City of Perris, which has the principal responsibility for processing and approving the project, is considered the "Lead Agency" for the purposes of CEQA compliance. As set forth in Section 15021 of the CEQA Guidelines, the City of Perris, as "Lead Agency", has the duty to avoid or minimize environmental damage where feasible. Furthermore, Section 15021(d) states that, "CEQA recognizes that in determining whether and how a project should be approved, a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors and in particular the goal of providing a decent home and

satisfying living environment for every Californian.” Other public agencies (i.e., Responsible and Trustee Agencies) that may use this EIR in their decision-making or permit processing, will consider the information in this EIR along with other information that may be presented during the CEQA process. In accordance with CEQA, the public agencies will be required to make findings for each environmental impact of the project that cannot be mitigated to below a level of significance. If the lead agency determines the benefits of the proposed project outweigh unavoidable significant environmental effects, the agency will be required to adopt a Statement of Overriding Considerations stating the reasons supporting their action notwithstanding the project’s significant environmental effects.

Effects Found Not to be Significant

Effects Found Not to be Significant during Preparation of the NOP

CEQA provides that an EIR shall focus on the significant effects on the environment, discussing the effects with emphasis in proportion to their severity and probability of occurrence. Effects dismissed in an initial study as clearly insignificant and unlikely to occur need not be discussed further in the EIR unless information inconsistent with the finding in the initial study is subsequently received.

Section 21100 (c) of the Public Resources Code states that an EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. Section 15128 of the CEQA Guidelines adds, “Such a statement may be contained in an attached copy of an Initial Study.”

The Initial Study prepared and circulated for public review on the Rados Distribution Center – Perris (Appendix A) concluded that the proposed development would not result in significant impacts to the following: Aesthetics, Mineral Resources, Public Services, and Recreation. These issue areas are not discussed further in this EIR. The basis for elimination of each relevant impact in these issue areas is documented in the appended Notice of Preparation document (Appendix A).

The NOP determined that several issue areas may have potentially significant effects on the environment, and therefore are discussed further in Section 4.0. Impacts related to the following issues were found to be potentially significant in the Initial Study: Agricultural Resources, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials (including Airports), Hydrology and Water Quality, Land Use/Planning, Noise, Population and Housing, Transportation/Traffic, and Utilities and Service Systems.

NOP Comment Letters

The public review period for the NOP/Initial Study began on November 21, 2008 and ended on December 22, 2008. The following is a list of all those entities which commented on the NOP/Initial Study and a brief summary of the issues raised. None of the comments received change the issue areas to be discussed in the DEIR. These letters can be found in Appendix A.

- **City of Riverside** 12/12/08 – The City of Riverside Planning Division requests that the traffic study and EIR address impacts associated with trucks short-cutting through the City of Riverside on Van Buren Boulevard from the I-215 and SR-91 freeways, any increase in truck and employee traffic on both the Alessandro Boulevard and Van Buren Boulevard corridors, identify appropriate mitigation to reduce any impact to and maintain levels of service within the City of Riverside, assume that the Mid County Parkway may not be built west of I-215 and what impacts on the City of Riverside will be accordingly, and the traffic study needs to include cumulative impacts from based on new projects planned in the vicinity. The City attached a list of planned project within their boundaries.
- **Val Verde Unified School District** 12/1/08 – The District wants its students health, safety, and welfare taken into consideration by the City's Environmental Health Agency to be kept apprised of traffic flow changes near its schools. The District states that the project will be required to satisfy State statutory fees prior to the issuance of building permits.
- **South Coast Air Quality Management District (SCAQMD)** 11/25/08 – SCAQMD's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the DEIR.
- **Soboba Band of Luiseno Indians** 12/10/08 – The Soboba Band of Luiseno Indians requests further consultation with their Cultural Resource Department, future updates on this project, copies of any archaeological and/or cultural resource documentation and proper notification prior to any surveys and ground disturbances so that a Native American Tribal Monitor can be present during the construction/excavation phase.
- **Pechanga Indian Reservation** 11/25/08 – This letter includes background information on the Pechanga Tribe and requests that Pechanga be involved with any project monitoring regarding cultural resources and proposes mitigation to be used in the DEIR.
- **County of Riverside Transportation Department (RCTD)** 12/24/08 – The RCTD requests that that the traffic study for the project address potential impacts and mitigation measures on any Riverside County roadways within the study area and requests that any intersections where the project would add 50 or more peak hour trips should be analyzed. RCTD also requests that the Riverside County Traffic Study Guidelines be followed for the impact analysis for County facilities. Requests were also made that the DEIR address impacts to the interchanges along I-215 at Cajalco Expressway and Nuevo Road and that a cumulative analysis be provided which includes all approved and pending projects within the County that are within one mile of the project site.
- **Riverside County Flood Control and Water Conservation District (District)** 12/23/08 – The District advised that the proposed project is located within the District's Perris Valley Master Drainage Plan (MDP). The District stated that the applicant should coordinate the

design of the proposed project with the District to ensure that it does not conflict with the MDP. The District owns, operates, and maintains the Perris Valley Channel to the east. Any work that involves the District's rights-of-way, easements, or facilities, will require an encroachment permit. The District requests the construction of any on-site or off-site drainage facilities necessary for the proposed project be addressed as well as potential impacts related to increased runoff or other drainage issues that may affect the Perris Valley Channel. The District also requested that the DEIR include a Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) consistency report with all supporting documents and adequate mitigation.

- **March Joint Powers Authority (March JPA)** 1/8/09 – March JPA requested that the project be forwarded to the Riverside County Airport Land Use Commission for a consistency finding prior to the final action by the City of Perris. March JPA also recommended conditions related to aviation easements and policies.
- **Metropolitan Water District of Southern California (MWD)** 12/22/08 – MWD requested that project impacts affecting drainage conditions to MWD's existing facilities and rights-of-way be evaluated and mitigation proposed as necessary. MWD also states that appropriate rights will need to be acquired to facilitate the overflow parking usage crossing their fee property. MWD was also concerned that potential impacts to their facilities associated with future excavation, construction, utilities, or other development that may result from project implementation.

Effects Found Not to be Significant as Part of the EIR Process

Based on the analysis contained in this document, the following issue areas have less than significant adverse environmental effects without requiring mitigation measures: Geology and Soils, Hydrology and Water Quality, Land Use and Planning, Noise, Solid Waste, and Water and Sewer. The following issue areas have potential environmental effects that can be mitigated to below the level of significance: Airports, Biological Resources, Cultural Resources, Hazards and Hazardous Materials, and Transportation and Traffic.

Please see the following referenced sections of this DEIR for more detailed discussion of these issue areas:

- Airports (Section 4.2)
- Biological Resources (Section 4.4)
- Cultural Resources (Section 4.5)
- Geology and Soils (Section 4.6)
- Hazards and Hazardous Materials (Section 4.7)
- Hydrology and Water Quality (Section 4.8)
- Land Use and Planning (Section 4.9)
- Noise (Section 4.10)
- Solid Waste (Section 4.11)
- Transportation and Traffic (Section 4.12)
- Water and Sewer (Section 4.13)

Potentially Significant Environmental Effects

Sections 15126, 15126.2 and 15126.4 of the CEQA Guidelines require consideration and discussion of significant environmental effects and mitigation measures proposed to minimize significant effects. All phases of a project must be considered when evaluating its impact on the environment: planning, acquisition, development, and operation (Section 15126) and an EIR shall identify and focus on the significant environmental effects of the proposed project (Section 15126.2).

Section 3.0 of this EIR addresses each environmental effect that was determined to be potentially significant during preparation of the NOP prepared for this project and mitigation measures proposed to minimize significant effects.

Potential project-specific and cumulative impacts upon Agricultural Resources and Air Quality were found to be unavoidably significant and cannot be mitigated to below the level of significance. A Statement of Overriding Consideration will be required for these issue areas.

Please see the following referenced sections of this DEIR for more detailed discussion of each issue area:

- Agricultural Resources (Section 4.1)
- Airports (Section 4.2)
- Air Quality (Section 4.3)
- Biological Resources (Section 4.4)
- Cultural Resources (Section 4.5)
- Geology and Soils (Section 4.6)
- Hazards and Hazardous Materials (Section 4.7)
- Hydrology and Water Quality (Section 4.8)
- Land Use and Planning (Section 4.9)
- Noise (Section 4.10)
- Solid Waste (Section 4.11)
- Transportation and Traffic (Section 4.12)
- Water and Sewer (Section 4.13)

Uses of this EIR

As the designated Lead Agency, the City of Perris has assumed responsibility for preparing this document. The decision to implement the project is within the purview of the City of Perris City Council. The City Council will use the information included in this EIR to consider potential impacts to the physical environment associated with the project when making its decision regarding the project.

The DEIR will be made available for review to the public and public agencies for 45 days to provide comments on the “sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated” (Section 15204 of the CEQA Guidelines).

The City will use the EIR and supporting documentation for implementation of the proposed project through the approval of land use proposals including, but not limited to, Zone Change and Development Plans and Agricultural Preserve Diminishment. Regulatory agencies will use the EIR and supporting documentation in its decision to issue permits related to development of the subject property.

3.0 PROJECT DESCRIPTION

PROJECT LOCATION

The Rados Distribution Center – Perris proposed project site is located on approximately 62 gross acres within the City of Perris, in Riverside County, California (**Figure 3.0-1, Regional Map**). The City of Moreno Valley is located north of the City of Perris, the City of Menifee is located to the south, and unincorporated Riverside County lands are located to the west and east of Perris. The City lies in the Perris Valley, a flat alluvial plain between the Santa Ana Mountains to the west and the San Jacinto Mountains to the east. The proposed project site is located directly north of Rider Street and west of Indian Street with Sinclair Street to the north and Interstate 215 to the west (**Figure 3.0-2, Aerial View of Project Area**).

SITE DESCRIPTION

The project site is rectangular in shape and is bounded by Webster Avenue on the west, Rider Street on the south, and Indian Avenue on the east. (**Figure 3.0-2, Aerial View of Project Area**) The project site is also described as being located within Section 7, Township 4 South, Range 3 West, San Bernardino Base & Meridian, and is identified by the Riverside County Assessor Parcel Number (APN) 303-050-002 and the southern approximately 155 feet of APN 303-050-003. (Latitude/Longitude: 33° 50' 27" North/117° 13' 04" West) The 9.6-acre (155 feet by 2,700 feet) area along the northern boundary of the site is owned by the Metropolitan Water District (MWD) (APN 303-050-003).

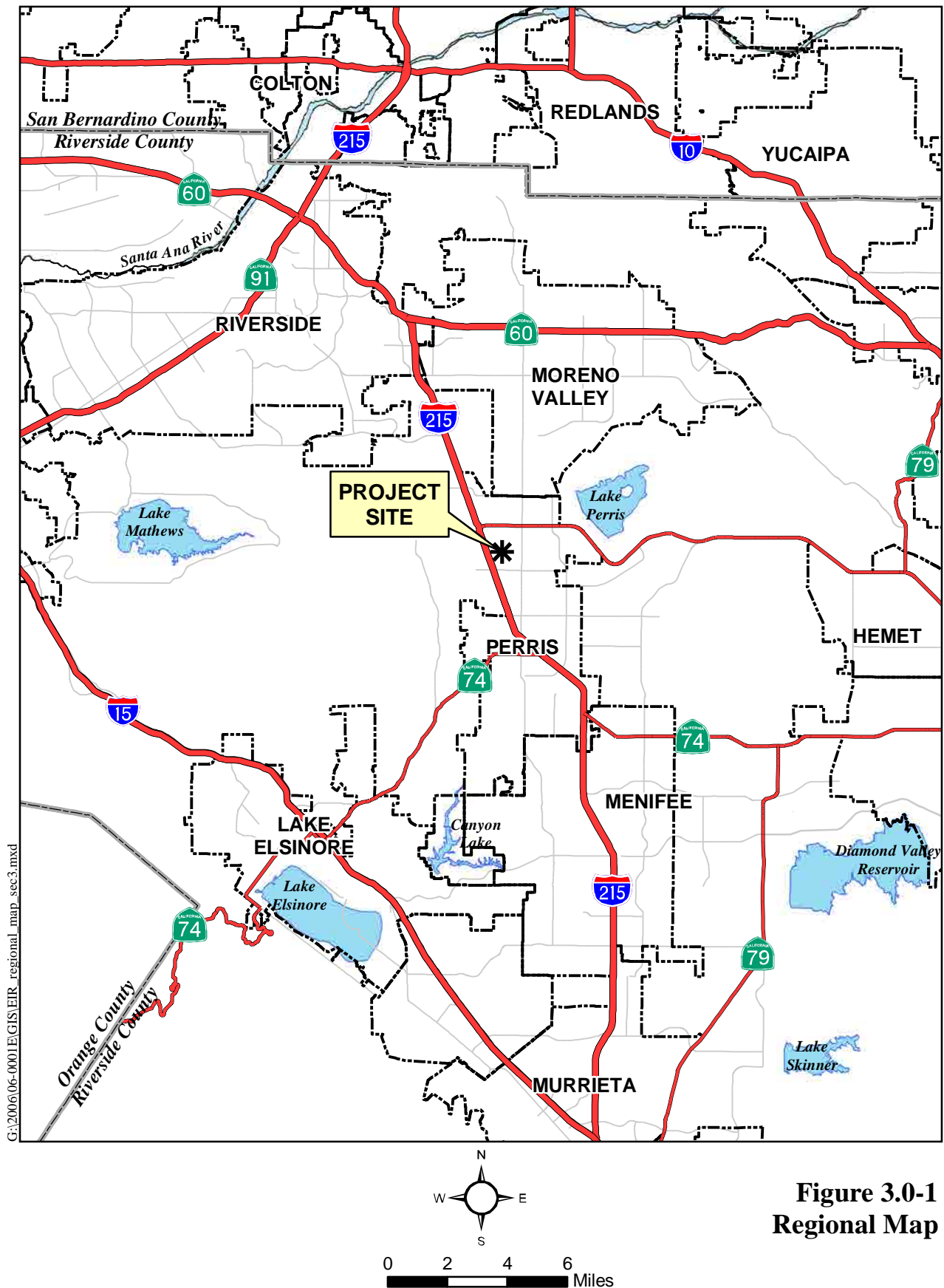
The 61.63 gross-acre site is vacant land currently designated as Light Industrial in the City of Perris General Plan. The surrounding area was formerly agricultural but is transitioning into predominantly industrial uses. The project site consists mainly of leveled farmland, part of which was previously a sod farm. The project site is currently leased to a farmer who plants winter wheat and plows the weeds year round. Adjacent to the project site are agriculture fields to the east and northeast, a commercial site and vacant land to the west, and existing industrial development to the north and south. (**Figure 3.0-2**)

Access to the site is provided by Interstate 215 to the west. There are two existing freeway interchanges which will service the project site, one at the Ramona Expressway and Interstate 215, and one at Harley Knox Boulevard (formerly Oleander Avenue) and Interstate 215. These freeway interchanges are located approximately one mile and two miles northwest of the site, respectively.

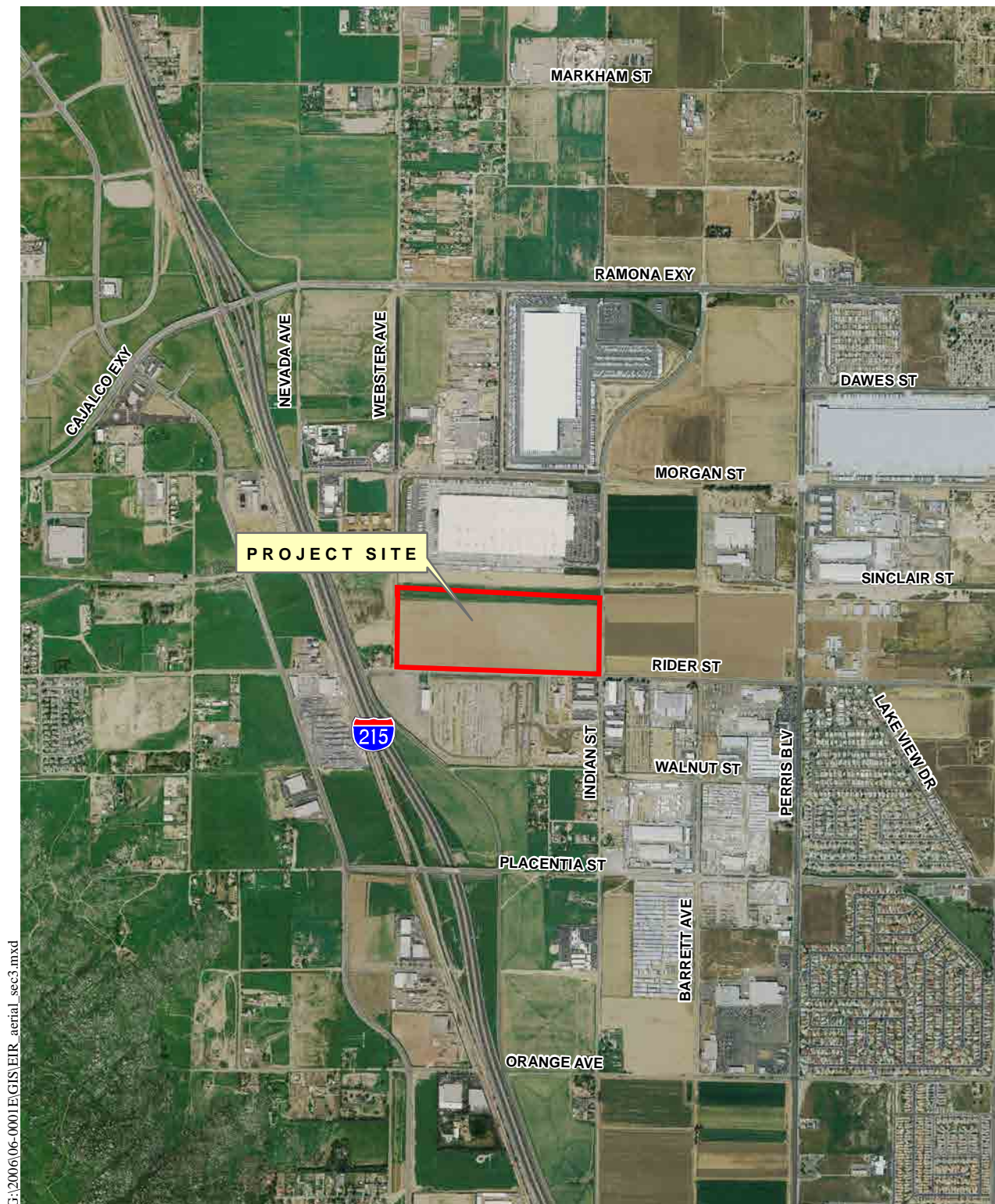
City of Perris

Rados Distribution Center - Perris Draft EIR

Section 3.0 - Project Description

ALBERT A. **WEBB** ASSOCIATES

3.0-2



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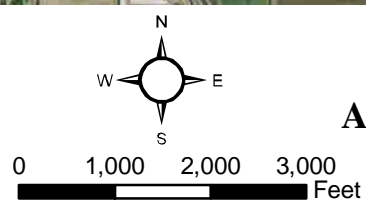


Figure 3.0-2
Aerial View of Project Area

Project Description

The proposed project is an approximately 1,191,080-square-foot distribution center on approximately 61.63 gross acres. The proposed building will have a maximum building height of approximately 44 feet and the elevations at the project site range between approximately 1,470 and 1,490 feet mean sea level. The project also includes approximately 720 standard parking spaces, 13 handicapped parking spaces and 353 trailer parking spaces. The MWD property would be leased for use as overflow parking (approximately 2.6 acres). (**Figure 3.0-3, Conceptual Site Plan**)

The proposed project includes the following land use applications: Zone Change 07-0117; Development Plan No. 07-0119; and Agricultural Diminishment 07-0118.

Zone Change No. 07-0117 (ZC 07-0117) is a proposal to change the zoning on the project site from A1 (Light Agriculture) to LI (Light Industrial).

Development Plan No. 07-0119 (DPR 07-0119) is an application to develop an approximately 1,191,080-square foot distribution center on approximately 61.63 gross acres. (**Figure 3.0-3**).

Agricultural Diminishment 07-0118 (AD 07-0118) proposes to remove the subject property from the Perris Valley Agricultural Preserve No. 1, Map No. 56.

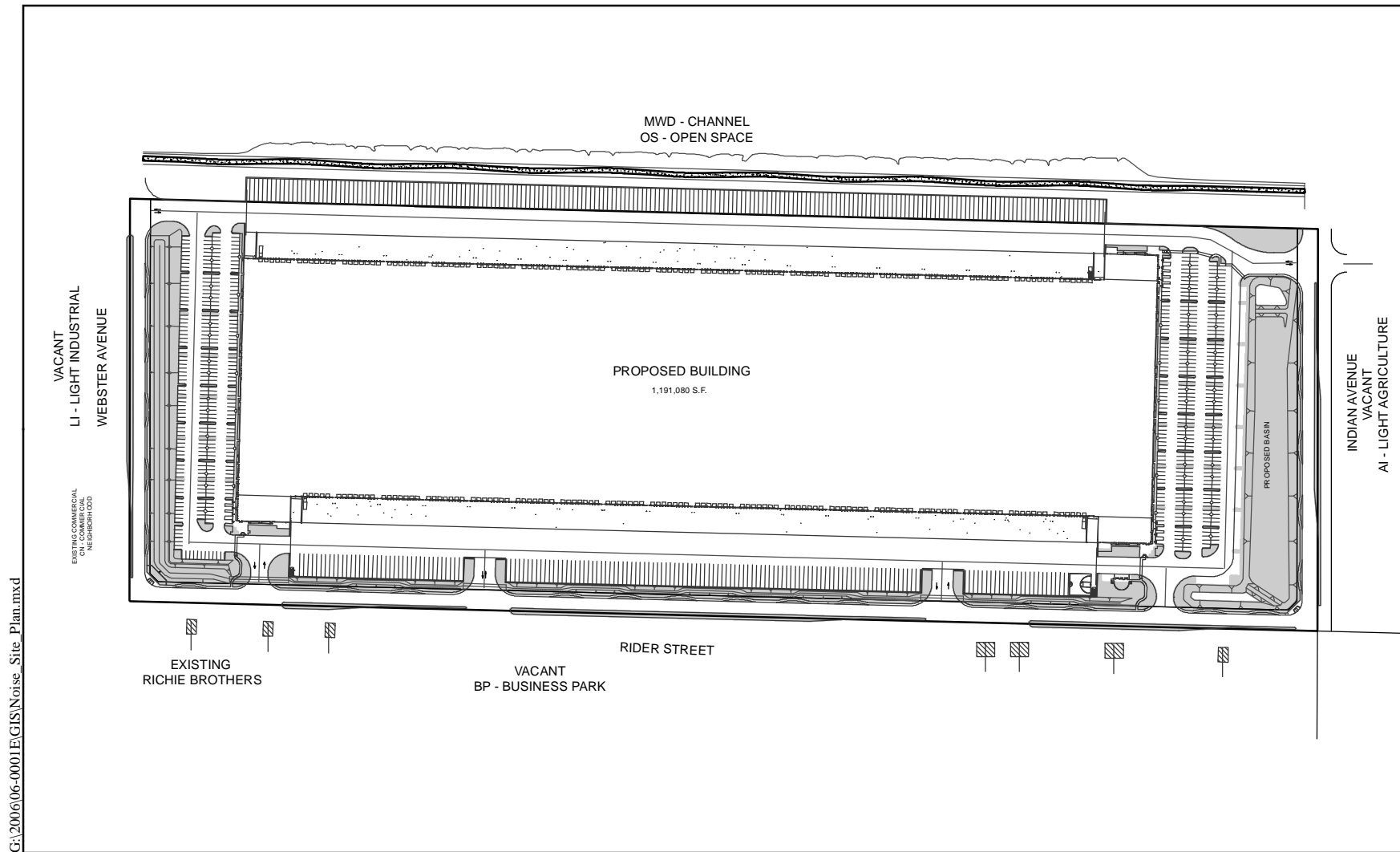
The proposed project is speculative. Speculative development means the applicant is constructing the building which will then be sold to other individual businesses or companies to own. The applicant will not own or operate the businesses which will ultimately occupy the site. Therefore, the specific occupants or specific uses of these buildings are not known at this time.

Approximately 75,000 cubic yards of import soils are needed for grading the site. Approximately 171,000 cubic yards of cut/fill will be generated on site, as well. A borrow site will be utilized for the import of soil; and although a specific borrow site has not been identified for the proposed project at this time, it is expected that it will be within a 10-mile radius.

The proposed project may require utility services provided by these purveyors:

Purveyor	Type of Services
Eastern Municipal Water District	potable water, sewer
Verizon	telephone
Southern California Edison	electricity
Southern California Gas Company	natural gas
CR&R Waste Services	solid waste disposal

The project is proposed to connect to the existing 14-inch diameter waterline in Rider Street. The project is also proposed to connect to the existing 8-inch diameter sewerline in Indian Avenue.



**Figure 3.0-3
Conceptual Site Plan**

Project Objectives

A clear statement of project objectives allows for the analysis of reasonable alternatives to the proposed project. A range of reasonable alternatives, both on and off site, that would feasibly attain most of the basic project objectives, while avoiding or substantially lessening the significant effects of the project, must be analyzed per CEQA Guidelines Section 15126.6. The Rados Distribution Center – Perris project will meet the following project objectives:

- Establish a modern, economically competitive distribution center to strengthen the City's economic viability by providing jobs;
- Implement the City of Perris General Plan land use designation of Light Industrial;
- Establish a modern, economically competitive distribution center to provide an expanded and diversified economic base for the city;
- Establish a modern, economically competitive distribution center near major transportation routes including freeways;
- Generate local tax revenue for the City of Perris and stimulate economic growth surrounding the project area; and
- Enhance image of the City of Perris by improving vacant property with a modern distribution center which is landscaped and provides improved roadways.

Discretionary Actions and Approvals

The DEIR serves as an informational document for use by public agencies, the general public, and decision makers. This DEIR discusses the impacts of development pursuant to the proposed project and related components and analyzes project alternatives. This DEIR will be used by the City of Perris and responsible agencies in assessing impacts of the proposed project.

The following public entities and/or agencies may use this DEIR when considering the project:

- **City of Perris Planning Commission**
 - a) Recommendation to the City of Perris City Council for Certification of the Final Environmental Impact Report for the project.
 - b) Recommendation to the City of Perris City Council regarding approval of Zone Change 07-0117 (ZC 07-0117) to change the zoning on the project site from A1 (Light Agriculture) to LI (Light Industrial).
 - c) Recommendation to the City of Perris City Council regarding approval of Development Plan Review 07-0119 (DPR 07-0119) for an approximately 1,191,080-square foot distribution center on approximately 61.63 gross acres.
 - d) Recommendation to City of Perris City Council regarding approval of Agricultural Diminishment 07-0118 (AD 07-0118) to remove the subject property from the Perris Valley Agricultural Preserve No. 1, Map No. 56.

- **City of Perris City Council**

- a) Certification of the Final Environmental Impact Report.
- b) Approval of Zone Change 07-0117 to change the zoning on the project site from A1 (Light Agriculture) to LI (Light Industrial).
- c) Approval of Development Plan 07-0119 for an approximately 1,191,080-square foot distribution center, parking lot with detention basin, and connection to off-site water and sewer infrastructure on approximately 61.63 gross acres.
- d) Approval of Agricultural Diminishment 07-0118 (AD 07-0118) to remove the subject property from the Perris Valley Agricultural Preserve No. 1, Map No. 56.

Other actions and permits may be needed to implement this project, including:

- **California Department of Transportation (Caltrans)**

- a) Issuance of encroachment permits related to street improvements within their rights-of-way.

- **Eastern Municipal Water District**

- a) Approval and construction of infrastructure (water and sewer) improvements.

- **Regional Water Quality Control Board**

- a) Issuance of a National Pollutant Discharge Elimination System (NPDES) Construction Permit (Order No. 99-08-DWQ).

- **Riverside County Airport Land Use Commission**

- a) Consistency Review

- **Riverside County Flood Control and Water Conservation District**

- a) Approval of hydrology/storm water drainage system.
- b) Provide the terms and conditions of design, construction, inspection, transfer of rights-of-way, project credit in lieu of charges and reimbursement schedule which may apply to Perris Valley Area Drainage Plan facilities constructed as part of this project.

Non-discretionary actions anticipated to be taken by the City at the Staff level as part of the proposed project include:

- Approval of a Storm Water Pollution Prevention Plan (SWPPP) to mitigate site runoff during construction.
- Approval of a Water Quality Management Plan (WQMP) to mitigate for post-construction runoff flows.

4.1 AGRICULTURAL RESOURCES

Potential impacts related to agricultural resources were found to be potentially significant in the Initial Study/NOP prepared for this project (Appendix A). The focus of the following discussion regarding impacts to agricultural resources is related to the potential impacts from the conversion of designated farmland to non-agricultural uses, conflicts with existing zoning for agricultural use or a Williamson Act contract, and other changes to the existing environment that could result in conversion of farmlands to non-agricultural uses.

In addition to other documents, the following references were used in the preparation of this section of the DEIR:

- Albert A. Webb Associates, *California Agricultural Land Evaluation and Site Assessment of the Rados Distribution Center – Perris Project Site*, January 2009. (Appendix B)
- California Department of Conservation, *Farmland of Local Importance*. (Available at www.consrv.ca.gov/dlrp/fmmp/Documents/Local_definitions_00.pdf, accessed on February 4, 2009.)
- California State Department of Conservation, Division of Land Resources Protection, Farmland Mapping and Monitoring Program, *Riverside County Important Farmland 2006, Sheet 1 of 3*. (Available at www.conservation.ca.gov/dlrp/Pages/Index.aspx, accessed on February 4, 2009.)
- City of Perris, *City of Perris General Plan 2030*, July 12, 2005. (Available at the City of Perris and at www.cityofperris.org/city-hall/general-plan.html, accessed on December 9, 2008.)
- City of Perris, *City of Perris General Plan 2030 Draft EIR*, October 2004. (Available at the City of Perris and at www.cityofperris.org/city-hall/general-plan.html, accessed on January 21, 2009.)
- County of Riverside, *Riverside County Integrated Project General Plan*, Adopted October 7, 2003. (Available at the Riverside County Planning Department and at www.rctlma.org/genplan/default.aspx, accessed on February 4, 2009.)
- LOR Geotechnical Group, Inc., *Phase I Environmental Site Assessment, 55.8± Acres NWC of Indian Avenue and Rider Street Perris, California*, December 23, 2002. (Appendix G)
- Riverside County Agricultural Commissioner's Office, *Riverside County 2007 Agricultural Production Report*. (Available at www.rivcoag.org/opencms/system/galleries/download/publications/2007_Annual_Crop_Report.pdf, accessed on February 4, 2009.)
- U. S. Department of Agriculture. Soil Conservation Service, *Soil Survey, Western Riverside Area, California*, November 1971. (Available at www.soils.usda.gov/survey/online_surveys/california/, accessed on January 28, 2009.)

Setting

The project site is approximately 62 acres within the City of Perris, Riverside County, California. The project site consists of relatively flat, vacant farmland, ranging in elevation from approximately 1,470 feet above sea level to 1,490 feet above sea level, sloping slightly toward the southeast. The project site has been heavily disturbed by activities associated with agriculture. As indicated in the Phase I Environmental Site Assessment (Appendix G), the project site has been used for agricultural purposes for as far back as 1949. Since then most of the project site has been used for sod farming. The sod farming operations no longer occur on the project site.

Agriculture has long been a major foundation of the economy and culture of Riverside County and remains a thriving part of the County of Riverside. However, in recent years, its role has been diminishing in the western portion of the County. While some agriculturally productive lands have been lost to other forms of development, other lands have been brought into agricultural production. As indicated in the Riverside County 2007 Agricultural Production Report, agricultural production represented a total gross valuation of \$1.10 billion in 2006, which was a 5.6 percent decrease from the 2005 gross value of \$1.17 billion. In 2007, total gross valuation increased to \$1.26 billion. Total planted acreage in Riverside County decreased 8.2 percent from 223,848 acres in 2005 to 205,437 acres in 2006. In 2007, total planned acreage further decreased to 203,469 acres.

Soils

According to the Soil Survey, Western Riverside Area, California, published by the U.S. Department of Agriculture, Soil Conservation Service (now the Natural Resources Conservation Service), the project site has one soil association on site, the Hanford-Tujunga-Greenfield association. The United States Department of Agriculture has identified three soil types on site. These soil types are: Greenfield sandy loam (GyA), 0-2 percent slopes; Greenfield sandy loam (GyC2), 2-8 percent slopes, eroded; Pachappa fine sandy loam (PaA), 0-2 percent slopes; and Ramona sandy loam (RaA), 0-2 percent slopes. The location of each soil type is shown in **Figure 4.1-1, Soils Map**. Refer to **Table 4.1-A, Soil Associations on Rados Distribution Center – Perris Project Site**, for more details on individual soil types.

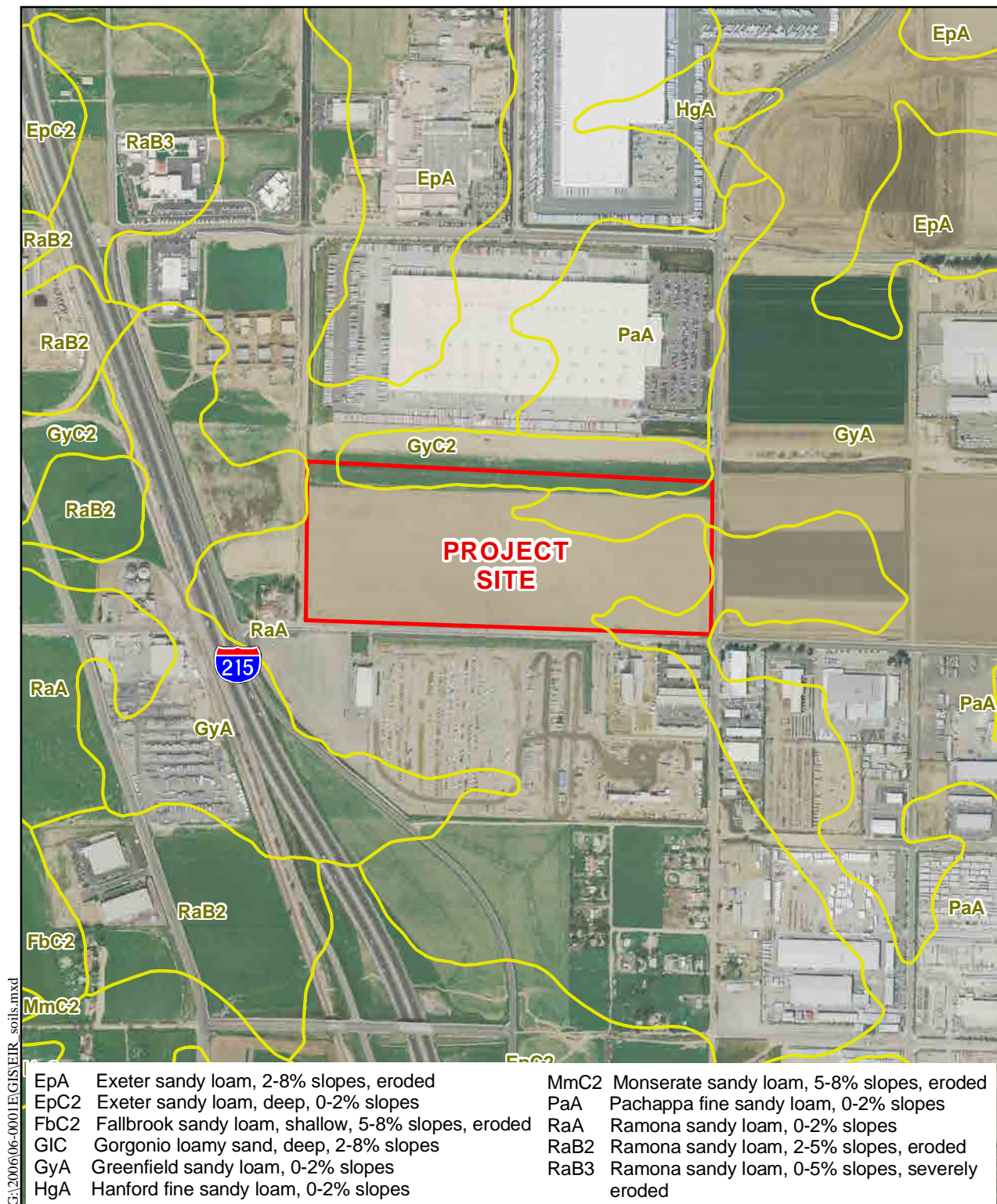


Figure 4.1-1
Soils Map

Table 4.1-A
Soil Associations on Rados Distribution Center – Perris Project Site

MAP SYMBOL	MAPPING UNIT	LAND CAPABILITY UNIT (LCC)	EROSION SUSCEPTIBILITY	RUNOFF POTENTIAL	STORIE INDEX RATING	SHRINK/ SWELL POTENTIAL
GyA	Greenfield sandy loam, 0–2 percent slopes	I-1 (19) Irrigated	Moderate	Medium	90	Low
GyC2	Greenfield sandy loam, 2–8 percent slopes, eroded	Ile-1 (19)	Slight to moderate	Slow to medium	81	Low
PaA	Pachappa fine sandy loam, 0–2 percent slopes	I-1 (19) Irrigated	Slight	Slow	95	Low
RaA	Ramona sandy loam, 0–2 percent slopes	I-1 (19) Irrigated	Slight	Slow	77	Low

* The information in this table is derived from the USDA Soil Survey report prepared for Western Riverside County.

Designated Farmland

“Designated Farmland” is a resource based on soil types which is mapped by the California Department of Conservation. The Department of Conservation maps important farmland across the state. Based on the Department of Conservation maps for Western Riverside County, the project site is identified as having Prime Farmland and Farmland of Local Importance. Prime Farmland encompasses approximately 57.9 acres of the project site, and Farmland of Local Importance encompasses approximately 6.1 acres of the project site.

Land must meet land use and soil criteria to be mapped as Prime Farmland or Farmland of Statewide Importance. To meet the land use criteria, the land has been used for irrigated agricultural production at some time during the four years prior to the designated farmland date. To meet the soil criteria, the soil must meet the physical and chemical criteria for Prime Farmland or Farmland of Statewide Importance as determined by the USDA Natural Resources Conservation Service (NRCS). NRCS compiles lists of which soils in each survey area meet the quality criteria. Factors considered in qualification of a soil by NRCS include, but are not limited to: water moisture regimes, soil temperature range, acid-alkali balance, soil sodium content, flooding, erodibility, and soil rooting depth.

The California Department of Conservation defines “Farmland of Local Importance” as land of importance to the local economy, as defined by each county's local advisory committee and adopted by its Board of Supervisors. Farmland of Local Importance is either currently producing, or has the capability of production, but does not meet the criteria of Prime Farmland, Farmland of Statewide Importance, or Unique Farmland. Authority to adopt or to recommend changes to the category of Farmland of Local Importance rests with the Board of Supervisors in each

county. As indicated in the Riverside County General Plan (Open Space Element, Chapter 5, OS-14), these soils have locally significant economic importance, and include the following: “lands with soils that would be classified as Prime or Statewide Important Farmlands but lack available irrigation water; lands planted in 1980 or 1981 in dry land grain crops such as barley, oats, and wheat; lands producing major crops for Riverside County but that are not listed as Unique Farmland crops (including permanent pasture (irrigated), summer squash, okra, eggplant, radishes, and watermelon; dairylands including corrals, pasture, milk facilities, hay and manure storage areas if accompanied with permanent pasture or hayland of 10 acres or more; lands identified by the County with Agriculture land use designations or contracts; and lands planted with jojoba that are under cultivation and are of production age.”

The City of Perris General Plan land use designation of the project site is primarily “Light Industrial”; with the northern approximately 155 feet of the project site, located within an MWD parcel, having a General Plan land use designation of “Public/Semi-Public Facilities/Utilities.” The project site is currently zoned A1 (Light Agriculture) and open space (**Figure 4.9-2, Zoning** and **Figure 4.9-3, General Plan Land Use Designations**).

Groundwater

As discussed in more detail in Section 4.8 (Hydrology and Water Quality) of this DEIR, the proposed project site is located within the jurisdiction of the Eastern Municipal Water District (EMWD), and the northern portion of EMWD’s service area covers the San Jacinto River Watershed. The San Jacinto Watershed covers an area of approximately 728 square miles, measured above a point just downstream from Railroad Canyon Dam. The project site is located within the bounds of the West San Jacinto Groundwater Basin, specifically the North Perris subbasin. The West San Jacinto Groundwater Basin lies within alluvium-filled valleys carved into the elevated bedrock plateau of the Perris Block. The San Jacinto and Casa Loma fault zones are the major geologic features that bound and/or crosscut many of the groundwater basins in this region, and typically are effective barriers to groundwater flow.

Eight groundwater management zones have been delineated within the San Jacinto Groundwater Basin, the project site is within the Perris North Management Zone (PNMZ). The PNMZ is located north of the San Jacinto River, and is bound by the impermeable, crystalline bedrock outcrops that compose the surrounding mountains and hills, which provide effective hard rock barriers to groundwater flow. The PNMZ is managed by EMWD under the West San Jacinto Groundwater Management Plan, which provides for establishment of an advisory committee; prioritizes the sub-basins (including the PNMZ); and evaluation of groundwater resources including establishing groundwater quality, level, and extraction monitoring.

Groundwater is available for agricultural use and was used for previous agricultural activities at the project site.

Soil Agricultural Capacity

Table 4.1-A, Soil Associations on Rados Distribution Center – Perris Project Site, provides Storie Index ratings and soil capability units for each soil type that occurs on the site and shown

in **Figure 4.1-1, Soils Map**. The Storie Index identifies the relative degree of suitability, or value of a soil for general intensive farming. The rating is based only on soil characteristics, such as depth, texture of the surface soil, density of subsoil, drainage, salts and alkali, and relief. Other factors which determine the desirability of growing specific crops, such as availability of water for irrigation, climate, and distance from markets, are not considered in establishing the Storie Index Rating. Soils are placed in grades according to their suitability for farming as shown by their Storie index ratings. The six grades, their range in index ratings, and farming suitability are described in **Table 4.1-B**.

**Table 4.1-B
Storie Index Rating**

Grade	Index Rating	Suitability for Agriculture
1	80 to 100	Soils have few or no limitations that restrict their use for crops.
2	60 to 79	Soils suitable for most crops but have minor limitations that narrow the choice of crops and have few special management needs.
3	40 to 59	Soils suited to a few crops or to special crops and require special management.
4	20 to 39	Soils severely limited for crops.
5	10 to 19	Soils generally not suited to cultivated crops, but can be used for pasture and range.
6	Less than 10	Soils and land types generally not suited to farming.

As shown above in **Table 4.1-A, Soil Associations on Rados Distribution Center – Perris Project Site**, the soils on the project site have Storie Index ratings ranging from 77 to 95. **Table 4.1-B** shows that the project site has Grade 1 and Grade 2 suitability for agriculture.

Soil capability, another measure of the agricultural value of soils, is rated in eight classes. In a general way, these capability groupings show the suitability of soils for most kinds of field crops. They are made according to the limitations of the soils when used for field crops, the risk of damage when they are used, and the way they respond to treatment. The grouping does not take into account major and generally expensive land-forming that would change slope, depth, or other characteristics of the soils; does not take into consideration possible but unlikely major reclamation projects; and does not apply to horticultural crops, or other crops requiring special management. In addition to the capability class, there are also identified subclasses and units, which identify the nature of the limitations responsible for placement of the soils in the capability class.

Capability Classes, the broadest groups, are designated by Roman numerals I through VIII. The numerals indicate progressively greater limitations and narrower choices for practical use, defined as follows:

Class I soils have few limitations that restrict their use.

Class II soils have moderate limitations that reduce the choice of plants or that require moderate conservation practices.

Class III soils have severe limitations that reduce the choice of plants, require special conservation practices, or both.

Class IV soils have very severe limitations that reduce the choice of plants, require very careful management, or both.

Class V soils are not likely to erode but have other limitations, impractical to remove, that limit their use largely to pasture, range, woodland, or wildlife. (None in the Western Riverside Area)

Class VI soils have severe limitations that make them generally unsuitable to cultivation and limit their use largely to pasture or range, woodland, or wildlife.

Class VII soils have very severe limitations that make them unsuited to cultivation and that restrict their use largely to pasture or range, woodland, or wildlife.

Class VIII soils and landforms have limitations that preclude their use for commercial plants and restrict their use to recreation, wildlife, or water supply, or to esthetic purposes.

The soils found on the project site include Class I and II soils, which indicate that the site soils classes have few limitations that will affect agricultural uses.

Related Regulations

The California Land Conservation Act (Williamson Act) was passed in 1965 to protect specific parcels of land in agricultural and open space use. It allows landowners to enter into ten-year contracts with local governments and in return receive lower property tax assessments.

Administration of the agricultural preserve program in the City of Perris involves two sets of records; one being the contract between the property owner and the City of Perris (or the County of Riverside if the subject property was within unincorporated Riverside County at the time the contract was executed), and the other being agricultural preserve maps establishing the boundaries of lands under contract. Contracts are valid for an initial period of ten years and automatically renew each year to maintain a ten-year life. The property owner may file a Notice of Non-renewal, stopping the automatic annual renewals and placing the contract in a status in which it runs out over the remaining life of the contract until the contract expires. Alternately, a property owner may request the cancellation of a contract, which is subject to an approval process and cancellation fees (also referred to as "penalties"), to provide an immediate end to the contract. When a Notice of Non-renewal has matured (i.e., the remaining years have run out and the property is no longer subject to the contract) or a cancellation occurs, removal of the subject land from the affected agricultural preserve requires a separate action to amend the official agricultural preserve maps by diminishing or disestablishing the agricultural preserve.

Per state law, the local jurisdiction's general plan land use designation and zoning for any piece of property must be consistent. The Land Use Element of the City of Perris General Plan is a 30-year guide for local government decisions on growth, capital investment, and physical development in the City of Perris. The Land Use Element is comprised of four sections: Existing

Conditions; Issues, Opportunities, and Constraints; Land Use Plan; and Strategy for Action. The City of Perris is divided into ten Planning Areas for purposes of analysis in Existing Conditions. The project site is located within Planning Area 3. This area contains land currently under agricultural cultivation. While the zoning code includes an Agricultural zoning designation, there is no corresponding agricultural land use designation in the General Plan. These agricultural lands could be converted to uses that generate revenue and create jobs within the City.

The City of Perris General Plan land use designation of the project site is primarily “Light Industrial”; with the northern approximately 155 feet of the project site, located within an MWD parcel, having a General Plan land use designation of “Public/Semi-Public Facilities/Utilities.” The project site is currently zoned A1 (Light Agriculture) and open space.

General Plan Policies

Goal I – Agricultural Resources: Orderly conversion of agricultural lands.

Policy I.A – Establish growth management strategies to ensure the proper timing and economics provisions for utilities, major streets and other facilities so that orderly development will occur.

Implementation Measure 1.A.1 – Revise the capital facilities fee program so that all infrastructure construction and improvements attributable to new development are fully funded.

Implementation Measure 1.A.2 – Require that development application for projects over 100 acres or more include master plans with backbone infrastructure paid for and installed by the developer.

Design Considerations

No specific design measures will be implemented that would avoid or reduce significant impacts to agricultural lands or operations.

Thresholds of Significance

The City of Perris has not adopted its own thresholds of significance and, instead, defers to the thresholds of significance identified in Appendix G of the CEQA Guidelines. Based on Appendix G of the CEQA Guidelines, impacts related to agricultural resources may be considered potentially significant if the project would:

- convert prime farmland, unique farmland or farmland of statewide importance as shown on the maps prepared pursuant to farmland mapping and monitoring program of the California resource agency, to non-agricultural use;
- conflict with existing zoning for agricultural use, or a Williamson Act contract; and/or
- involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural uses.

Environmental Impacts Before Mitigation

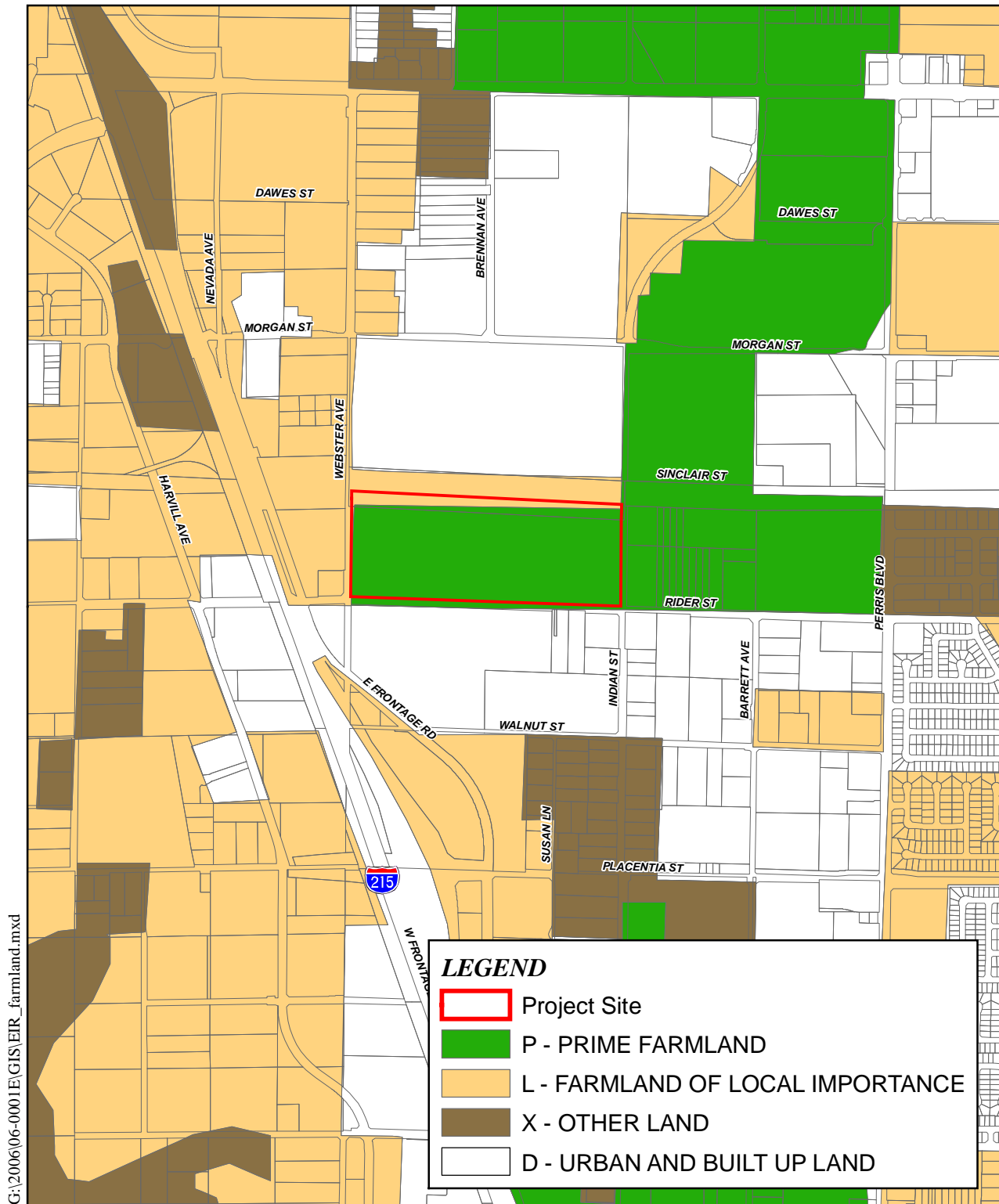
Threshold: *The proposed project would convert prime farmland, unique farmland, or farmland of statewide importance, as shown on the maps prepared pursuant to the farmland mapping and monitoring program of the California resource agency, to non-agricultural use.*

Designated Farmland is a resource based on soil types which is mapped by the California Department of Conservation. The Department of Conservation maintains maps identifying important farmland across the state. Based on the maps for Western Riverside County, the entire project site is identified as a mix of Prime Farmland and Farmland of Local Importance. Prime Farmland includes lands with the best combination of physical and chemical features for the production of agricultural crops, and encompasses approximately 58 acres of the project site. Farmland of Local Importance encompasses approximately 6 acres of the project site (**Figure 4.1-2, Farmland Designations**). The proposed project does not accommodate the preservation of these designated Farmlands.

In order to determine the significance of this loss of designated Farmland, the CEQA Guidelines Appendix G suggests the use of the Department of Conservation’s Land Evaluation and Site Assessment (LESA) model to assess the significance of conversion of agricultural lands. For the purposes of evaluation in this EIR, the LESA model is used as the tool to assess the significance of this threshold. The LESA evaluation (Appendix B of this document) was completed utilizing the procedures set forth in the *California Agricultural Land Evaluation and Site Assessment Model* (“LESA Manual”) developed by the California Department of Conservation.

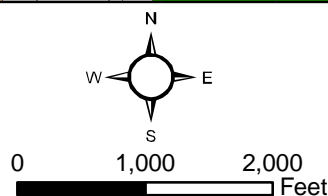
Development of the proposed project will convert approximately 58 acres of Prime Farmland and approximately six acres of Farmland of Local Importance into non-agricultural land uses. The impacts of this conversion are also addressed in the Cumulative Impact Analysis in Section 6.0 of this document. The LESA model was used to analyze the significance of the conversion of agricultural lands to urban uses on the project site. The project site was evaluated through the LESA model on several factors related to agricultural suitability. Soil types, soil characteristics, relative project size, water availability, and surrounding uses related to agriculture were all factors used to “rate” the project site based on its “agricultural value.” The LESA model utilizes a rating system based on 100 possible points to evaluate each of these factors, and then weights them to comprise a final score which ultimately describes the agricultural value of the project site. See Appendix B of this document for a full discussion of the LESA analysis of the proposed project.

The proposed project site scored 44.7 out of 50 points on the Land Evaluation (LE) section which relates soil types and characteristics to agriculture. The proposed project site scored 28.5 out of 50 for its Site Assessment (SA) characteristics which consider items such as water availability, project site, and surrounding agriculture. The final LESA model score for the proposed project site was 73.2 out of 100. This score of 73.2 resulted in a scoring decision of “Considered Significant unless either LE or SA subscore is less than 20 points” pursuant to the LESA Manual. The Rados Distribution Center – Perris Project Site attained a score of 73.2 and both the LE and SA subscore exceeded 20 points. This LESA model score indicates that conversion of agricultural lands on the project site will be considered a **significant impact**.



Source: CA Dept. of Conservation,
FMMP, 2004

**Figure 4.1-2
Farmland Designations**



Contributing to these LESA scores was the fact that slightly more than a third of the surrounding project area within a one-quarter mile radius of the project site, 38.4 percent, is currently in active agriculture, or is former agricultural land that has not yet been committed to non-agricultural uses through the approval of a development application¹. It should be noted that although existing agricultural land within the City of Perris Planning Area 3 has not yet been formally committed to non-agricultural use through formal approval of development applications, it has all been designated for urban density land uses by the City of Perris General Plan.

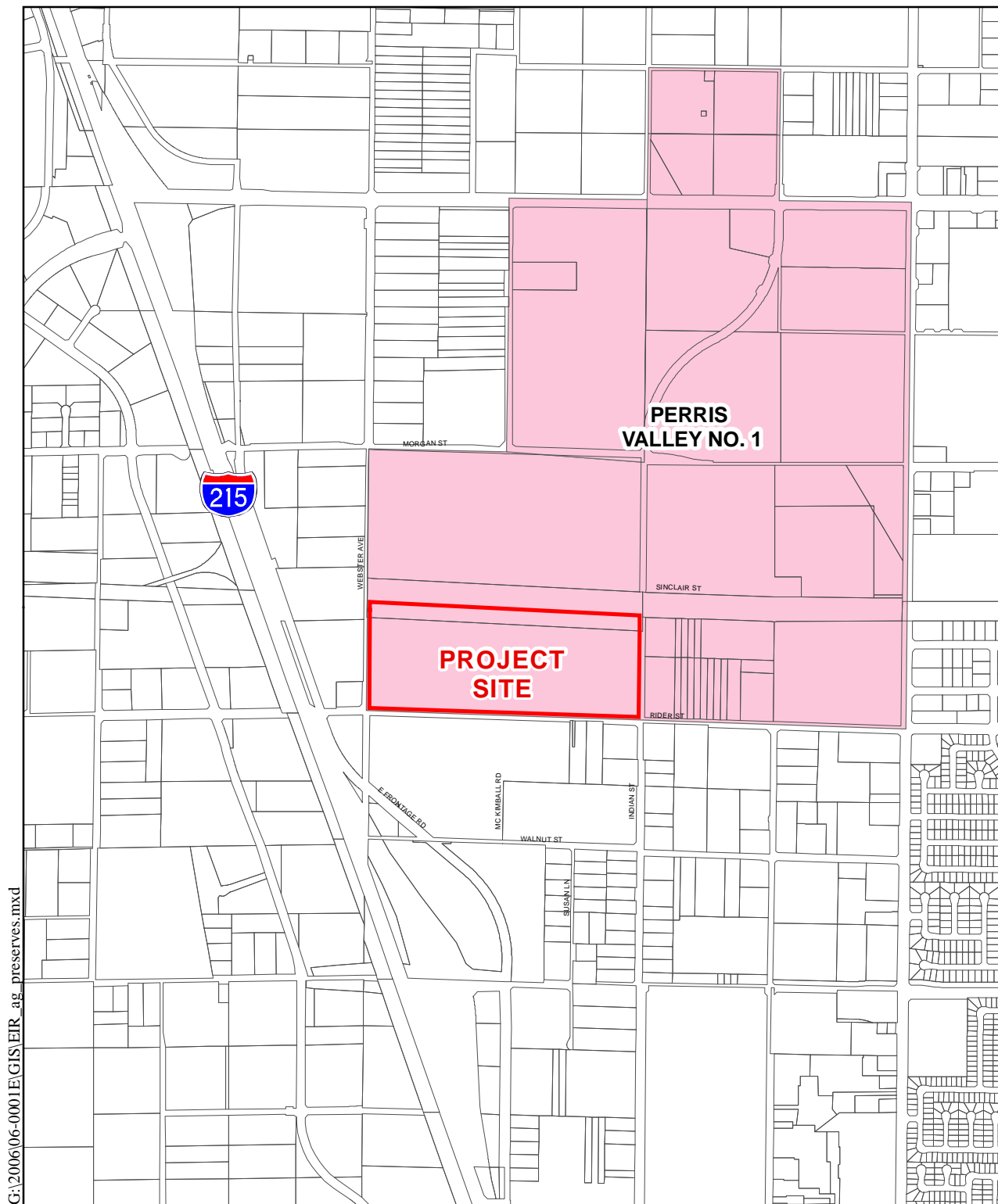
The project site is located within an area that is converting from agriculture to non-agricultural uses; nevertheless, the existence of accessible groundwater, favorable soil types, and surrounding agriculture makes the project site farmland conversion significant pursuant to the LESA model. Therefore, the project would have **significant environmental impacts** as it would convert Prime Farmland, as identified on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Department of Conservation, to non-agricultural use.

Threshold: *The proposed project could conflict with existing agricultural use or a Williamson Act contract.*

The surrounding area was formerly agricultural but is transitioning into predominantly industrial uses. The project site consists mainly of leveled farmland, part of which was previously a sod farm, and is currently being used for winter wheat crop production. Adjacent to the project site are agriculture fields to the east and northeast, a commercial site and vacant land to the west, and existing industrial development to the north and south. The project site is currently under an active Williamson Act contract and located within the Perris Valley Agricultural Preserve No. 1. Additionally, the Perris Valley Agricultural Preserve No. 1 includes parcels to the south, southeast, east, and northeast of the project site (**Figure 4.1-3, Agricultural Preserves**).

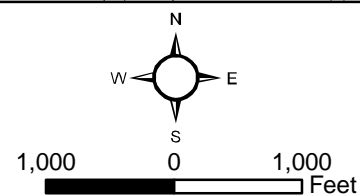
As indicated in the *California Agricultural Land Evaluation and Site Assessment of the Rados Distribution Center – Perris Project Site* prepared for the project (Appendix B), approximately 150 acres of the 394 acres within a one-quarter mile radius of the project site are currently under active agriculture; of which, only approximately 68 acres are under an active Williamson Act contract.

¹ The LESA Model prepared for the proposed project utilized the discussion contained within the *California Agricultural Land Evaluation and Site Assessment Model Instruction Manual* prepared by the California Department of Conservation (1997) for identifying “land committed to nonagricultural use.” Pursuant to this discussion; for land to be considered committed to nonagricultural uses, the land must be permanently committed by local elected officials to nonagricultural development by virtue of decisions which cannot be reversed simply by a majority vote of a city council or county board of supervisors. Thus the “committed” land must be so designated in an adopted local general plan, and must also have received tentative subdivision approval; tentative or final parcel map approval, a recorded development agreement, or an equivalent approval. Zoning by itself or a general plan designation by itself does not qualify as a permanent commitment.



Source: Riverside County GIS,
March 2008

Figure 4.1-3
Agricultural Preserves



According to the City of Perris General Plan, potential conflicts between new development and existing agricultural land uses occur when new development, by its nature, precludes or interferes with the continued agricultural use of adjacent or nearby land. Agriculture has a long history in the Perris Valley, and fifty-two percent of the land is still identified with current or former agricultural uses. Conversion of agricultural areas to urbanized uses includes a number of issues including isolated or “leapfrog” development, diminishing open space buffers, and land use compatibility. The viability of agriculture in Perris is based primarily on economics. Urban and rural residential developments offer greater profits due to the present high demand for housing in this region, and because Perris’ climate requires extensive irrigation.

The project area (Planning Area 3) currently consists of agricultural-zoned land that represents 42% of the City’s agricultural zoning, although there is no agricultural land use designation in the General Plan. The largest land use designation within Planning Area 3 is Light Industrial. The General Plan plans to expand the light industrial and commercial land uses due to the close proximity to Interstate 215, a cargo airport, rail lines, and other commercial and industrial land uses. Conversion of agricultural land to light industrial and commercial uses is compatible with surrounding land uses and consistent with the General Plan with the intention of promoting economic growth within an undeveloped area in the City of Perris. The project includes a Change of Zone from A1 (Light Agricultural) to LI (Light Industrial) which would be consistent with the General Plan, and General Plan Policy IV.A, to make the General Plan and zoning consistent with each other. Therefore, the proposed project is considered to be consistent with the Land Use Plan set forth in the General Plan. Once the Change of Zone is approved, the project will be consistent with the proposed zoning and development standards established for the project.

Proximity to the Interstate 215 corridor suggests conversion of agricultural land, over the long term, to uses that are compatible with surrounding commercial and industrial uses. Conversion could enhance the economy of the City by attracting new uses that complement the existing Lowe’s and Ross distribution centers and provide jobs for local residents. Nearby residential development may support some level of retail uses in this planning area. This area contains land currently under agricultural cultivation. While the zoning code includes an Agricultural zoning designation, there is no corresponding agricultural land use designation in the City’s General Plan. These agricultural lands could be converted to uses that generate revenue and create jobs within the City. The proposed project is consistent with the goals for Planning Area 3, converting agricultural land to a light industrial distribution center, complementing surrounding light industrial development, and creating additional jobs for surrounding residential development. This project will be compatible with no significant adverse impacts to the applicable policy set forth in the City of Perris General Plan. Therefore, the project’s potential conflict with existing agricultural uses is expected to be limited and **less than significant**.

Furthermore, as described in the EIR prepared for the City of Perris General Plan 2030 (Page VI-3), the 1991 General Plan Land Use Element redesignated all agricultural lands for uses other than agriculture. Some of the remaining land zoned for agricultural use is subject to a Williamson Act contract.

The proposed project site contains one parcel and a portion of another totaling approximately 62 acres (303-050-002 and portion of 303-050-003). One of these parcels is currently subject to an active Williamson Act contract and is located within Perris Valley Agricultural Preserve No. 1, Map No. 56. A Notice of Non-renewal was filed with the City of Perris for the 55± acre parcel located on the northeast corner of Rider Street and Webster Avenue (APN 303-050-002) which will result in the ultimate expiration of the Williamson Act contract applicable to this parcel.

A Request for Diminishment of Perris Valley Agricultural Preserve No. 1 was submitted to the City on April 12, 2007. If the proposed project is approved, the City Council will adopt a resolution, which will cancel the Williamson Act contract applicable to APN 303-050-002 and diminishing the Perris Valley Agricultural Preserve No. 1 by removing that parcel from the boundaries of the agricultural preserve. The other parcel within the project site, 303-050-003 is not currently subject to active Williamson Act contract.

Therefore, under these circumstances, the project will have **less than significant** environmental effects because it would not conflict with an existing Williamson Act contract.

Threshold: *The proposed project involves other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use.*

The project includes the conversion of designated farmland to non-agricultural uses. Other than direct conversion of on-site designated farmland to non-agricultural uses, as discussed above, improvements to several of the project area roadway intersections, as well as improvements to the region's utilities (water and sewer), could have an impact on the remaining agricultural lands within the vicinity of the project area.

The project site is located in an area that has historically and currently consists of agricultural uses. The project includes improvements to surrounding roadways, which will help to alleviate the additional traffic volumes as a result of project implementation. The project site is surrounded by existing roadways, which provide access to and from the project site and the City. Because access to the adjacent agricultural sites to the west, north, northwest, south and southeast is not limited, these circulation improvements should not create any additional opportunities to convert these lands to urban uses.

The project site consists of approximately 61.63 acres located at the northeast corner of Rider Street and Webster Avenue, in the City of Perris. The project site is rectangular in shape and is bounded by Webster Avenue on the west, Rider Street on the south, and Indian Avenue on the east. The surrounding area was formerly agricultural but is transitioning into predominantly industrial uses. Adjacent to the project site are agriculture fields to the east and northeast, a commercial site and vacant land to the west, and existing industrial development to the north and south. As described in Section 4.13 (Transportation and Traffic) of this DEIR, the proposed project will include improvements to Indian Avenue, Rider Street, and Webster Avenue along the project frontage. Therefore, any road improvements associated with the project will not cause the direct conversion of farmland to non-agricultural use. The adjacent agricultural sites to the east and northeast have sufficient existing access from existing roads.

Water and wastewater treatment service will be provided by Eastern Municipal Water District (EMWD). EMWD provides water treatment services to the project site and the surrounding area. The project will connect to an existing 14-inch diameter water line located in Rider Street. Some additional water lines will be constructed within and adjacent to the boundaries of the proposed project in order to extend water service from the existing water line in Rider Street to new service points within the project.

EMWD will provide sewer service to the project via an existing 8-inch diameter sewer line located in Indian Avenue, approximately 300 feet south of the project. EMWD has incorporated the extension of this 27-inch diameter sewer line in their Master Water and Sewer Plan. The line will extend into Rider Street and will also continue north on Indian Avenue. These facilities would be placed within road rights-of-way, and would have minimal environmental impacts. Sewage collected from these lines will be conveyed to EMWD's Perris Valley Regional Water Reclamation Facility, located west of the I-215 freeway and south of Highway 74.

The proposed project will not increase the likelihood of adjacent agricultural lands being converted to non-agricultural uses because, as indicated above, the project area is currently undergoing significant changes from agricultural land uses to more residential and commercial uses without the project. As discussed above, required roadway improvements will not result in the conversion of farmland to non-agricultural uses. Furthermore, the water and sewer extensions will not increase the likelihood of agricultural land conversion because there are existing facilities within close proximity to the project site and the project will not be extended past farmland that does not currently have access to existing water and sewer facilities. The proposed project does not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use and therefore, potential impacts will be **less than significant**.

Proposed Mitigation Measures

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (CEQA Guidelines, Section 15126.4). Mitigation measures were evaluated for their ability to eliminate or reduce to a level below significant the potential significant adverse impacts upon agriculture. Potential mitigation measures are addressed in the following discussion. No feasible mitigation measures were identified that could reduce the impacts from loss of agricultural lands to below the level of significance.

- **Place a conservation easement on alternative farmland, or place such alternative farmland under Williamson Act contract.** A conservation easement would place a permanent deed restriction on a piece of property allowing only agricultural uses on said property. A land trust then becomes the steward of that property. A conservation easement for the protection of agricultural lands is different than placing lands under conservation for biological habitat, because agriculture is a business. When a property is set aside to preserve habitat, a land trust is responsible for making sure the land is left alone as native habitat. Placing that natural land under permanent conservation does not economically burden the property owner, as that owner has likely been compensated for its purchase. However, the placement of a permanent restriction on a property that only allows for agriculture in

perpetuity, limits that property to one type of business. Continued agricultural production is dependent on economic and social factors that determine where, when and how long that business will stay in operation. Placing a piece of property under permanent agricultural use could cause future land use compatibility issues as surrounding lands are developed, as seen in the portions of City of Perris and nearby unincorporated Riverside County.

Even if feasible, the placing of alternative farmland under a conservation easement or under Williamson Act contract would establish a commitment to retain that alternative farmland for agricultural use. The length of time that alternative land will remain in agricultural use would be dependent upon the terms of the conservation easement (perpetual agricultural use) or Williamson Act contract (minimum 10 year term). However, the conservation easement or Williamson Act contract will only reduce the potential that the alternative land will convert to non-agricultural use. These documents cannot feasibly assure the land will actually be farmed. The individual and cumulative loss of agricultural land caused by the proposed project will still occur. Therefore, this mitigation measure will not reduce the proposed project's impacts upon agriculture to below the level of significance. For these reasons, placing alternative privately-held lands under permanent restriction through conservation easements is considered infeasible.

- **Pay a per-acre mitigation fee to be used for the acquisition of fee title to or development rights on farmland elsewhere.** The City of Perris does not have a program for the transfer of development rights from one property to another. The payment of a mitigation fee for the acquisition of fee title to or development rights from agricultural property would only have the effect of preventing use of property for non-agricultural purposes. It does not ensure that the land would be put to use for agricultural purposes. There would be no reduction in the individual or cumulative impacts resulting from the loss of agricultural land and uses on the project site. Thus, this potential mitigation measure would not reduce or eliminate the proposed project's impacts upon agriculture.
- **Sell and transfer soils from the project-site to another soil-poor site.** It is not feasible to sell and transfer the soils on the project site and relocate to another site in such a manner that would mitigate for the loss of farmland. This is because in order to duplicate the types of soils found on the project site on a different site, the entire soil profile (typically five feet deep) would need to remain intact and undisturbed while being removed and relocated. Additionally, the relocated soil will need to be compacted on the new site to match the soil conditions that existing before the soil was moved. Such precise soil profile movement and recreation is considered to be infeasible. Further, the majority of the project site is designated as Prime Farmland which represents the fact that the land has been used for irrigated agricultural production within the last four years and meets specific soil criteria. The designation of land as Prime Farmland, Farmland of Statewide Importance and Farmland of Local Importance is performed by the State Department of Conservation and therefore the even if the transfer of the soil profile from the project site to a soil-poor site could be accomplished; the designation of the new site as farmland could not be assured inasmuch any assessment of the future actions of the State Department of Conservation cannot be determined. Thus, the transfer of soil to another site would not reduce or eliminate the project's impacts on farmland.

The proposed project will convert agricultural lands as contemplated by the City of Perris General Plan.

No feasible mitigation exists to reduce or eliminate this impact, and a Statement of Overriding Consideration would be required prior to project approval.

Summary of Environmental Effects After Mitigation Measures Are Implemented

The implementation of this project will result in significant adverse environmental impacts from the conversion of Farmland to non-agricultural use. A Statement of Overriding Consideration would be required prior to project approval.

4.2 AIRPORT HAZARDS

Potential impacts related to airports were found to be potentially significant in the Notice of Preparation prepared for this project (Appendix A) as they related to consistency with an airport master plan and the potential safety hazards related to the site's proximity to March Air Reserve Base (MARB). The focus of the following discussion is related to the project's relation to the MARB.

In addition to other reference documents, the following references were used in the preparation of this section of the DEIR:

- California Department of Transportation, Division of Aeronautics, *2002 California Airport Land Use Planning Handbook*. (Available at www.dot.ca.gov/hq/planning/aeronaut/documents/ALUPHComplete-7-02rev.pdf, accessed on January 29, 2009.)
- City of Perris, *City of Perris General Plan 2030, Safety Element*, Approved October 25, 2005. (Available at the City of Perris Planning Department and at www.cityofperris.org/city-hall/general-plan.html, accessed on January 29, 2009.)
- March Air Reserve Base United States Air Force, *Air Installation Compatible Use Zone (AICUZ) Study*, 1998. (Available at <http://www.marchjpa.com/docs.html>, accessed on March 3, 2010.)
- March Air Reserve Base United States Air Force, *Air Installation Compatible Use Zone (AICUZ) Study*, 2005. (Available at <http://www.marchjpa.com/docs.html>, accessed on March 3, 2010.)
- Mead & Hunt and Coffman Associates, Inc., *Riverside County Airport Land Use Compatibility Plan Document*, October 14, 2004. (Available at www.rcaluc.org/plan_new.asp, accessed on January 29, 2009.)
- Riverside County Airport Land Use Commission, *Riverside County Airport Land Use Plan*, April 26, 1984. (Available at the Riverside County Airport Land Use Commission and at www.rcaluc.org/plan_old.asp, accessed on January 29, 2009.)

Setting

March Air Reserve Base

MARB was first acquired in 1918 by the U.S. Army when it was known as Alessandro Aviation Field. The airport was in active military service until 1996 at which time it was realigned to an Air Force Reserve Base. Currently, the airport is governed by the four-party Joint Powers Authority (JPA) including the County of Riverside and the cities of Moreno Valley, Riverside, and Perris. The JPA has created the March Inland Port to serve as a civilian cargo port capable of handling the largest of cargo planes. In addition, Boeing has been using the airport to test its large aircraft, including the Boeing-777.

MARB is located in an unincorporated portion of Riverside County southeast of the City of Riverside. It is located northwest of the Rados Distribution Center – Perris project site on the east side of Interstate 215. MARB is bordered by the City of Moreno Valley to the north and east, and by the City of Perris on the south. The 2005 update of the MARB Air Installation Compatibility Use Zone (AICUZ) Study summarized current and forecast aircraft activity at MARB. The AICUZ study states that there are 40,813 annual current military and civilian aircraft operations, with a total of 69,600 military, civilian and other aircraft operations forecast for MARB. Each arrival (landing) and departure (takeoff) is counted as a separate operation and closed pattern operations in which the aircraft conducts a “touch-and-go” landing (or a low approach and departure) are counted as two operations. Operations by based military aircraft include KC-10, KC-135, C-141 and C-17 aircraft. Transient military aircraft operations, consisting of a variety of aircraft, include aircraft arriving and departing MARB, operations by aircraft traveling through the area, and training operations conducted by aircraft based at other locations. Military-related civil operations include contract cargo flights for delivery of aircraft parts and maintenance supplies and contract passenger flights.

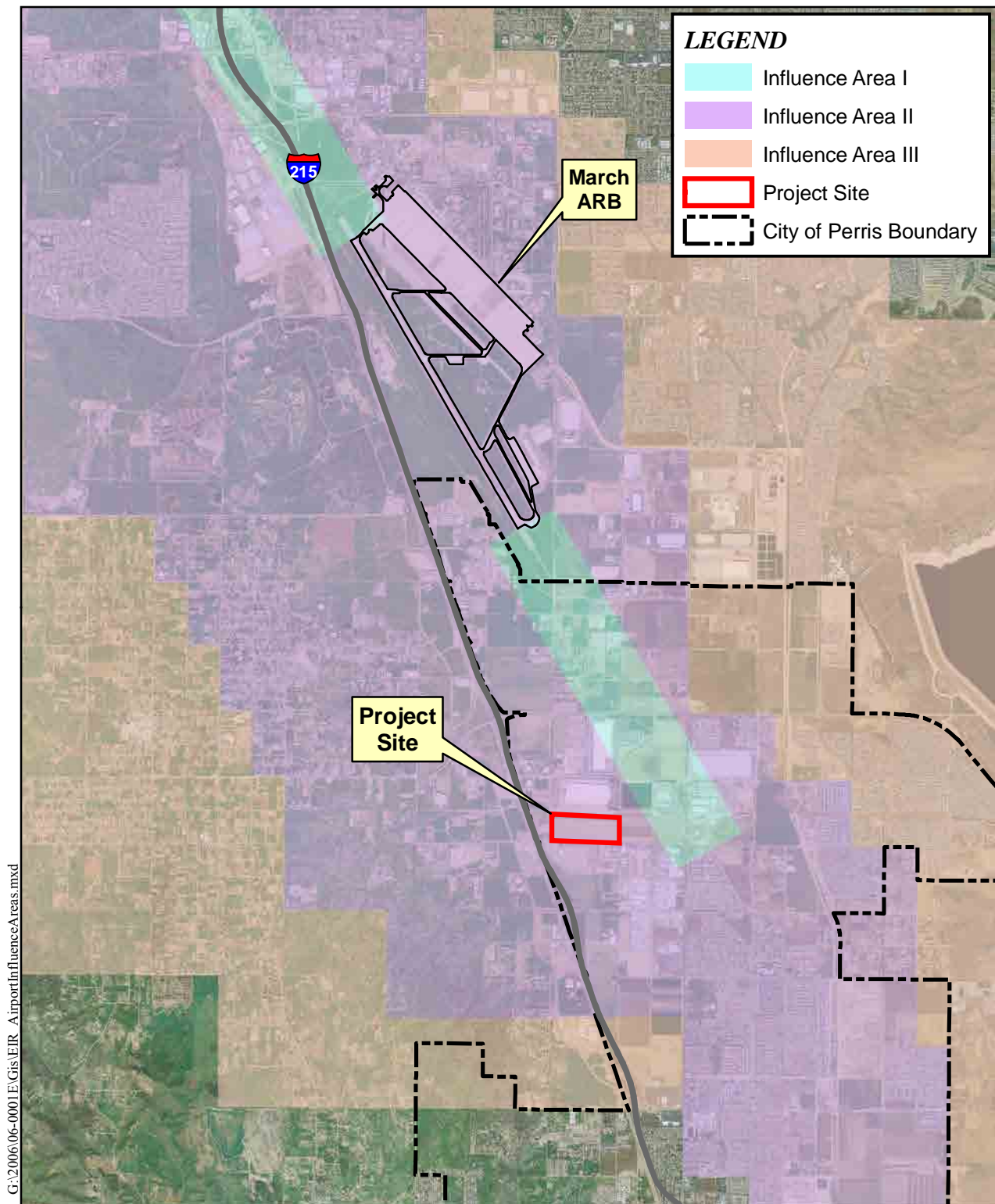
On April 26, 1984, the Riverside County Airport Land Use Commission (ALUC) adopted the Riverside County Airport Land Use Plan (ALUP). This plan established land use restrictions within the Airport-Influenced Areas that were adopted by the ALUC around airports in Riverside County. In 1986, airport-influenced areas were established around MARB (which was realigned and converted to MARB on April 1, 1996). The airport-influenced area around MARB is divided into three land use planning areas (Area I, Area II and Area III). Area I generally represents the imaginary approach surface defined by Federal Aviation Regulations Part 77 as the approach surfaces for the size and type of runways at the airport. Area II is defined by the ALUC as areas of significant safety concern due to aircraft maneuvering, ascending, descending, turning, and changing power settings when landing or taking off from the airport. Area III represents the outer boundary of the airport-influenced area. Areas I and II are considered to be a part of Area III (**Figure 4.2-1, March Air Reserve Base Influence Areas**).

Airport Safety Concerns

Safety is a factor in the interaction between airports and nearby land uses in three distinct ways:

- Protecting people and property on the ground.
- Minimizing injury to aircraft occupants.
- Preventing creation of hazards to flight.

Each of these concerns needs to be addressed in airport land use compatibility plans. The nature of each is summarized in the following discussion.



Sources: County of Riverside, 2008;
Digital Globe, March 2008.

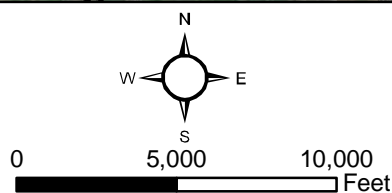


Figure 4.2-1
March ARB
Influence Areas

Protecting People and Property on the Ground

Protecting people and property on the ground from potential consequences of near-airport accidents is a fundamental land use compatibility objective. To accomplish this, some form of restrictions on land use is essential. Land use characteristics are the most important factors to consider in safety compatibility criteria. The potential severity of an off-airport accident is highly dependent upon the nature of the land use at the accident site. For the purposes of evaluating the relative risks presented by different land uses, three characteristics are most important.

- **Intensity of Use** – The most direct means of limiting the potential consequences of an off-airport aircraft accident is to limit the intensity of use. Intensity of use is measured in terms of the number of people which the development can attract per acre. This measurement service is a common denominator among various types of nonresidential uses. Except for certain especially risk-sensitive uses, as noted below, the degree of safety compatibility is usually considered the same for any two land uses of similar usage intensities.
- **Residential versus Non-residential Function** – Residential land uses are typically measured in dwelling units per acre, rather than people per acre. This is principally a practical measure to simplify implementation. However, residential uses are also normally afforded a comparatively higher degree of protection than non-residential uses. That is, for a given location, higher occupancy levels are permitted for non-residential uses than residential uses.
- **Sensitive Uses** – Certain other types of land uses are also commonly regarded as requiring special protection from hazards such as potential aircraft accidents. These uses fall into two categories:
 1. *Low Effective Mobility Occupancies*: Society normally seeks a high degree of protection for certain groups of people, especially children and the infirm. A common element among these groups is inability, either because of inexperience or physical limitations, to move out of harm's way. Among the types of land uses regarded as particularly risk-sensitive are elementary and secondary schools, day care centers, hospitals and nursing homes.
 2. *Hazardous Materials*: Functions, such as above-ground storage of large quantities of flammable materials or other hazardous substances which could substantially contribute to the severity of an aircraft accident if they were to be involved in one.

Minimizing Injury to Aircraft Occupants

In accidents involving an aircraft that is out of control as it descends, the character of the land uses below are not likely to have a significant effect on the survivability of the crash. However, some aircraft mishaps involve situations in which the aircraft is descending, often without power, but otherwise under control. If the aircraft has sufficient altitude, the pilot has some choice as to where to attempt an emergency landing. Under these circumstances, the pilot of a disabled aircraft will, if possible, direct the aircraft toward some form of open land when an off-airport emergency landing is inevitable.

This propensity forms the premise behind the primary form of land use control intended to minimize the severity of injury to aircraft occupants in the event of an off-airport emergency landing. Specifically, some amount of useful open land should be preserved in the vicinity of airports.

Preventing Creations of Hazards to Flight

Unlike the preceding land use characteristics which can only affect the consequences of an aircraft accident (for better or worse), hazards to flight can be the cause of an accident. Hazards to flight fall into three basic categories:

- Obstructions to airspace required for flight to, from, and around an airport.
- Wildlife hazards.
- Other forms of interference with safe flight, navigation, or communication.

Related Regulations

Federal Requirements

Federal Aviation Administration

Land use safety guidance from the Federal Aviation Administration (FAA) is limited to the immediate vicinity of the runway, the runway protection zones at each end of the runway, and the protection of navigable airspace. The FAA criteria apply only to property controlled by the airport proprietor. It has no authority over off-airport land uses.

The emphasis in FAA safety criteria is upon the runway surface and the areas immediately adjoining it. Standards are established which specify ground surface gradients for areas adjacent to runways and acceptable location and height of aeronautical equipment placed nearby.

Runway protection zones (RPZs) are trapezoidal-shaped areas located at ground level beyond each end of a runway. The dimensions of RPZs vary depending upon the type of landing approach available at the airport (visual, non-precision, or precision) and characteristics of the critical aircraft operating at the airport (weight and approach speed). Ideally, each runway protection zone should be clear of all objects. The FAA's *Airport Design* advisory circular strongly recommends that airports own this property outright or to obtain easements sufficient to control the land. Even on portions of the RPZs not under airport control, the FAA recommends that churches, schools, hospitals, office buildings, shopping centers, and other places of public assembly, as well as fuel storage facilities be prohibited. Beyond the runway protection zones, the FAA has no specific safety-related land use guidance other than airspace protection.

Airspace Protection

Part 77 of the Federal Aviation Regulations (FAR), *Objects Affecting Navigable Airspace*, establishes standards for determining obstructions to navigable airspace and the effects of such obstructions on the safe and efficient use of that airspace. The regulations require that the FAA be notified of proposed construction or alteration of objects (whether permanent, temporary, or of natural growth) if those objects would be of a height which exceeds FAR Part 77 criteria.

The Part 77 regulations define a variety of imaginary surfaces at certain altitudes around airports. The Part 77 surfaces include the primary surface, approach surface, transitional surface, horizontal surface, and conical surface. Collectively, the Part 77 surfaces around an airport define a bowl-shaped area with ramps sloping up from each runway end. The Part 77 standards are not absolute height restrictions, but instead identify elevations at which structures may present a potential safety problem. Penetrations of the Part 77 surface generally are reviewed on a case-by-case basis.

The FAA has additional guidelines regarding protection of airport airspace, which are set forth in other FAA documents. In general, these criteria specify that no use of land or water anywhere within the boundaries encompassed by FAR Part 77 should be allowed if it could endanger or interfere with the landing, take off, or maneuvering of an aircraft at an airport (FAA-1987).

Specific characteristics to be avoided include creation of electrical interference with navigational signals or radio communication between the airport and aircraft, lighting which is difficult to distinguish from airport lighting, glare in the eyes of pilots using the airport, smoke, or other impairments to visibility in the airport vicinity, and uses which attract birds and create bird strike hazards.

State of California Regulations

Similar to regulations at the federal level, California state laws and regulations provide few specifics regarding airport land use safety compatibility. Available guidance is found in two primary locations, the State Aeronautics Act and the State Education Code.

The Aeronautics Act (Public Resources Code, Section 21001 *et. seq.*) provides for the right of flight over private property, unless conducted in a dangerous manner or at altitudes below those prescribed by federal authority. The Act gives the State Department of Transportation (Caltrans) and local governments the authority to protect the airspace defined by FAR Part 77 criteria. The act prohibits any person from constructing a structure or permitting any natural growth of a height that would constitute a hazard to air navigation unless a permit is obtained from Caltrans. No permit is required if it is determined that the structure or growth is not a hazard to aviation. Typically, this has been interpreted to mean that no penetration of FAR Part 77 imaginary surfaces is permitted without a finding by the FAA that the object would not constitute a hazard to air navigation.

The State Education Code (Section 17215) requires proposed school sites within two miles of an airport to be evaluated by the State Department of Education and Caltrans. If Caltrans makes an unfavorable determination regarding the proposed school site, no state or local funds can be used for site acquisition or building construction on that site.

In addition to the above laws and regulations, Section 21096 of the California Environmental Quality Act (Public Resources Code Sections 21000 *et seq.*) requires a “lead agency” to utilize the Airport Land Use Planning Handbook published by the Division of Aeronautics of the Department of Transportation as a technical resource to assist in the preparation of the environmental impact report as the report relates to airport-related safety hazards and noise problems. The State Department of Transportation, Division of Aeronautics published its most recent “California Airport Land Use Planning Handbook” (“CALUP Handbook”) in January 2002. This document has been used as a technical resource in the preparation of this Draft EIR.

Compliance with Existing Regulations

A project site would require review by the Riverside County ALUC if the site falls within an airport zone, such as a safety zone or airport-influence zone. The 1984 Riverside County ALUP establishes land use compatibility guidelines for three Airport-Influenced Areas (Area I, Area II, and Area III). The project site is located within Area II (**Figure 4.2-1, March Air Reserve Base Influence Areas**). The entire project site is located within the MARB Airport Influence Policy Area and Influence Area II as identified On Figure S-18 of the City of Perris General Plan’s Safety Element.

The 1984 Riverside County ALUP's Area II guidelines allow large-lot single family residential, agriculture, industrial, and commercial uses. The MARB AICUZ Study does not impose any additional restrictions on the project area as it is not located in within an established Clear Zone or Accident Potential Zone (APZ). The ALUC will ensure that any applicable measures to minimize the project's impacts upon MARB will be applied to the project.

Design Considerations

The proposed land use for the project site is consistent with the permitted uses for Airport Influence Zone II: light industrial, warehouse/distribution and commercial.

Thresholds of Significance

The City of Perris has not adopted its own thresholds of significance and, instead, defers to the thresholds of significance identified in Appendix G of the CEQA Guidelines. Based on Appendix G of the CEQA Guidelines, impacts on airports may be considered potentially significant if the proposed project would:

- result in a safety hazard for people residing or working in the project area where located within an airport land use plan or, where such a plan has not been adopted, within two miles of public airport or public use airport.

Environmental Impacts Before Mitigation

Threshold: *Would the project result in a safety hazard for people residing or working in the project area where located within an airport land use plan or, where such a plan has not been adopted, within two miles of public airport or public use airport.*

On April 26, 1984, the Riverside County ALUC adopted the Riverside County ALUP. This plan-established land use restrictions within the Airport-Influenced Areas that were adopted by the ALUC around airports in Riverside County. In 1986, airport-influenced areas were established around March Air Force Base (which was realigned and converted to MARB on April 1, 1996). The airport-influenced area around MARB is divided into three land use planning areas (Area I, Area II and Area III).

In 1998 and again in 2005, updates of the MARB AICUZ Study were completed. The purpose of the AICUZ Study is to promote compatible land development in areas subject to aircraft noise and accident potential. With respect to accident potential, the AICUZ Study identifies a Clear Zone and two Accident Potential Zones (APZs) based on the landing threshold for each runway. Within the Clear Zones, most land uses are incompatible with aircraft operations. Within the APZs, a variety of land uses are compatible, however, people-intensive uses are restricted because of the greater risk in these areas. Outside of the Clear Zones and APZs, the risk of aircraft accidents is not significant to warrant special consideration in land use planning.

MARB does not have a Comprehensive Land Use Plan and therefore the ALUC utilizes the planning areas set forth in the 1984 Riverside County ALUP, a 1986 mapping of the airport-influenced areas and the clear zones and accident potential zones (APZs) identified in the 2005 AICUZ Study to evaluate master plan consistency. The project site falls within Area II of the airport-influenced area and thus review by the Riverside County ALUC is required. On September 10, 2009, ALUC staff found the project to be consistent.

Airport Noise Compatibility Guidelines

The 1984 ALUP establishes two policies related to airport noise. These policies state the following:

- Within Area III, aviation easements will be required for all land uses. The height of the aviation easements will be from runway ground elevation within Area I, the defined approach surfaces, and from 150 feet above runway ground level elevation throughout the remainder of Areas II and III.
- New housing is to be constructed within the noise level specified by the ALUC for each airport shall be sound-proofed as necessary to achieve interior annual noise levels attributable to exterior sources, not to exceed 45 dB (CNEL of Ldn) in any habital [sic] room with windows closed.

As shown in **Figure 4.2-2, Accident Potential Zones for March ARB**, the northeastern part of the project site falls along the outside edge of the MARB's 60 dBA CNEL noise contour, as depicted in the 2005 MARB AICUZ Study. Section A.7 of the Appendices to the AICUZ Study states that "most industrial/manufacturing uses are compatible in the airfield environs" and that the "commercial/retail trade and personal and business services are compatible without restriction up to DNL [Day-Night Average A-Weighted Sound Level] 70 Db." Because MARB noise levels are less than 60 dB CNEL at the project site, warehouse/distribution uses are considered compatible with the exterior noise level guidelines set forth in the 1984 Riverside County ALUP and with the land use compatibility policies of the 2005 MARB AICUZ Study.

Although the project site falls outside of the CNEL noise contours for MARB, the project site is located beneath identified flight tracks for airplanes using the airfield at MARB (**Figure 4.2-3, March Air Reserve Base Flight Tracks**). As such, there is potential for single-event noise exposure levels to affect the proposed project. The exposure levels will vary dependant upon the type of aircraft and flight track flown for each operation at MARB. However, the industrial, warehouse and distribution land use within the proposed project are not considered to be sensitive receivers and therefore the impacts from these single-event noise levels are considered to be **below the level of significance**.

Airport Vicinity Height Guidelines

The federal government has developed standards for determining obstructions in navigable airspace. FAR Part 77 defines a variety of imaginary surfaces at certain altitudes around airports. The Part 77 surfaces include the primary surface, approach surface, transitional surface, horizontal surface, and conical surface. Collectively, the Part 77 surfaces around an airport

define a bowl-shaped area with ramps sloping up from each runway end (**Figure 4.2-4, FAR Part 77 Imaginary Surfaces**). The Part 77 standards are not absolute height restrictions, but instead identify elevations at which structures may present a potential safety problem. Penetrations of the Part 77 surface generally are reviewed on a case-by-case basis. The 2005 MARB AICUZ Study uses the Part 77 criteria as the basis for height limitations in the vicinity of MARB. As shown on **Figure 4.2-4**, the Rados Distribution Center - Perris site is located partially within the “Conical Surface” and partially within the “Transitional Surface.”

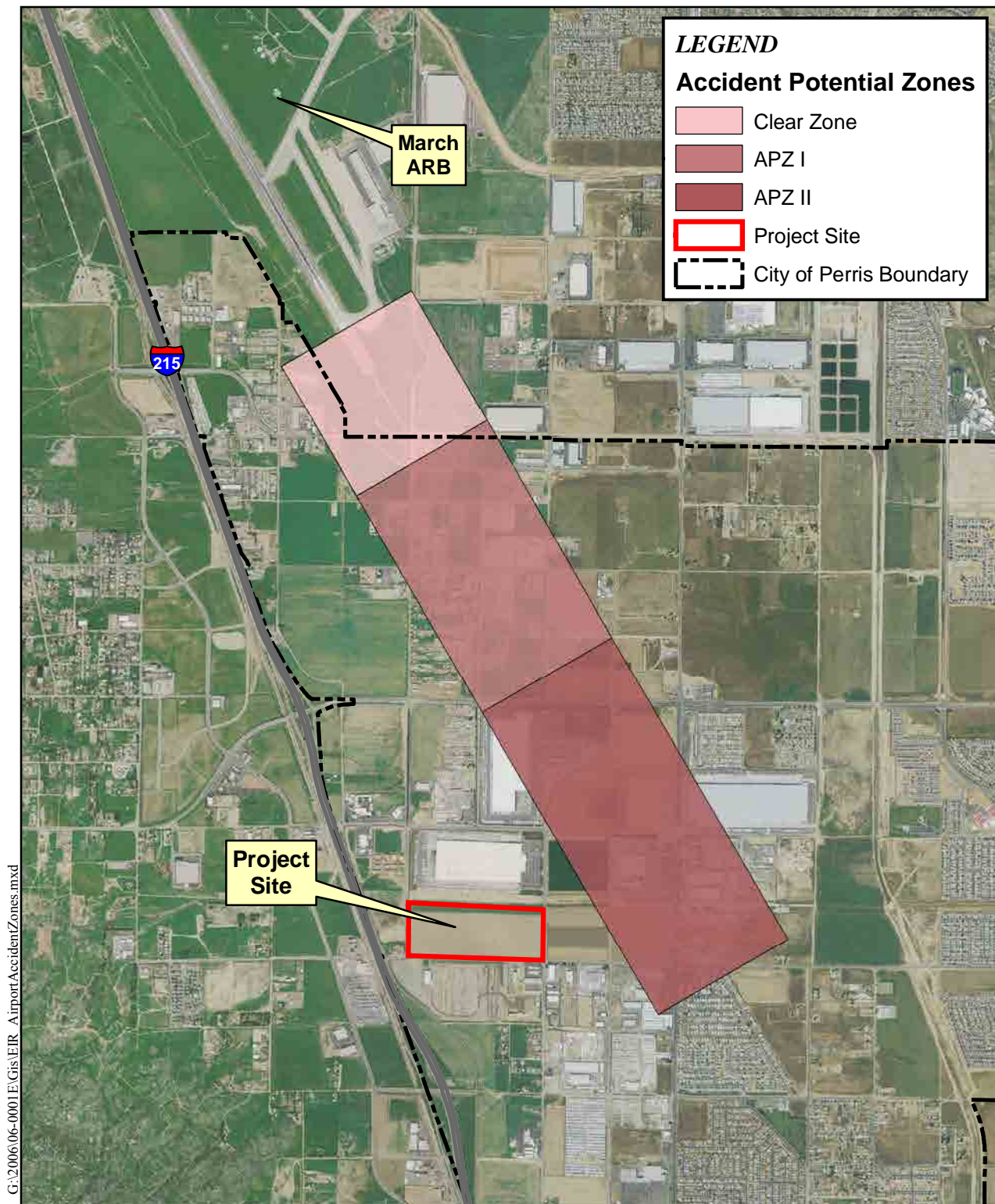


Figure 4.2-2
Accident Potential
Zones for MARB

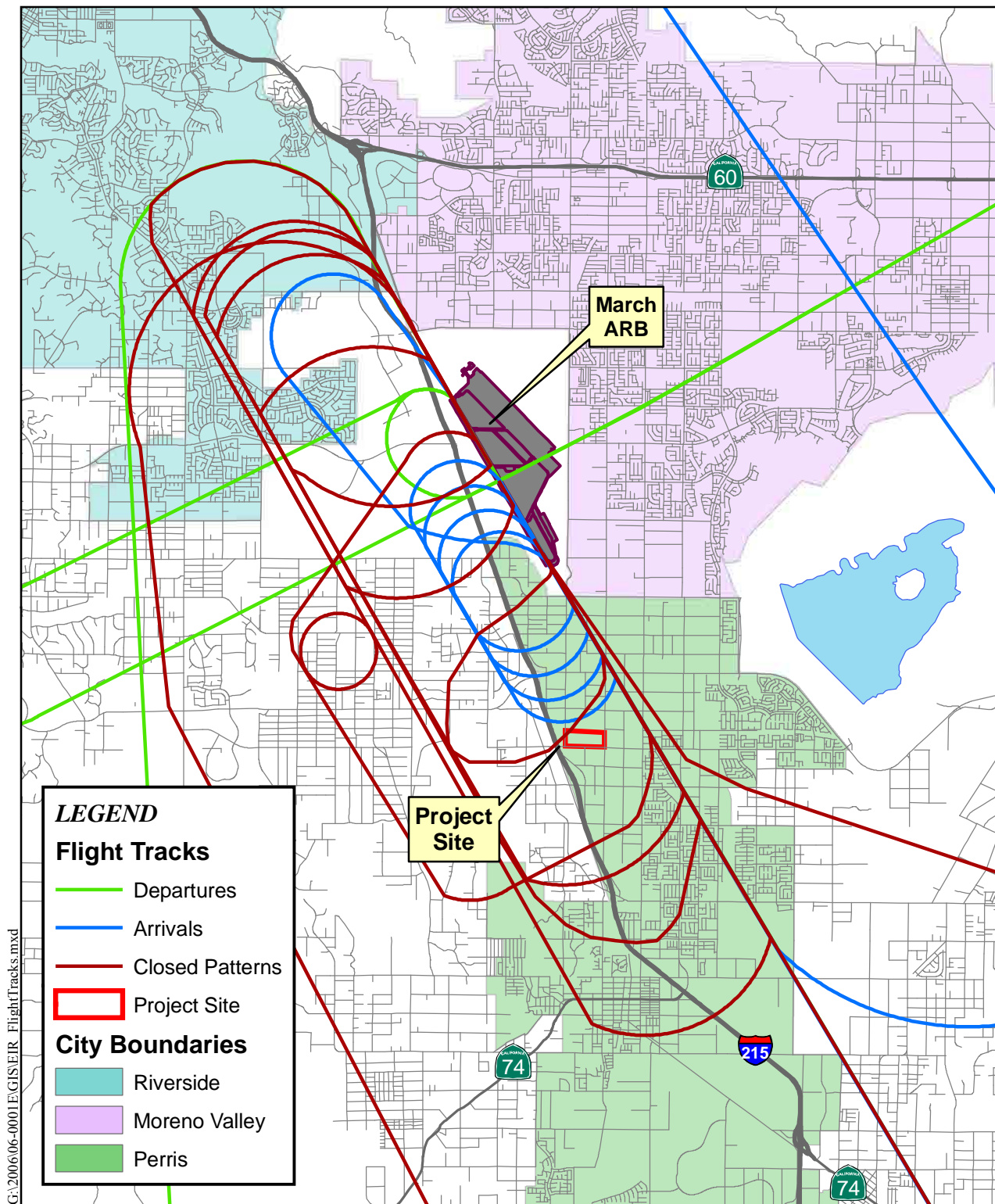
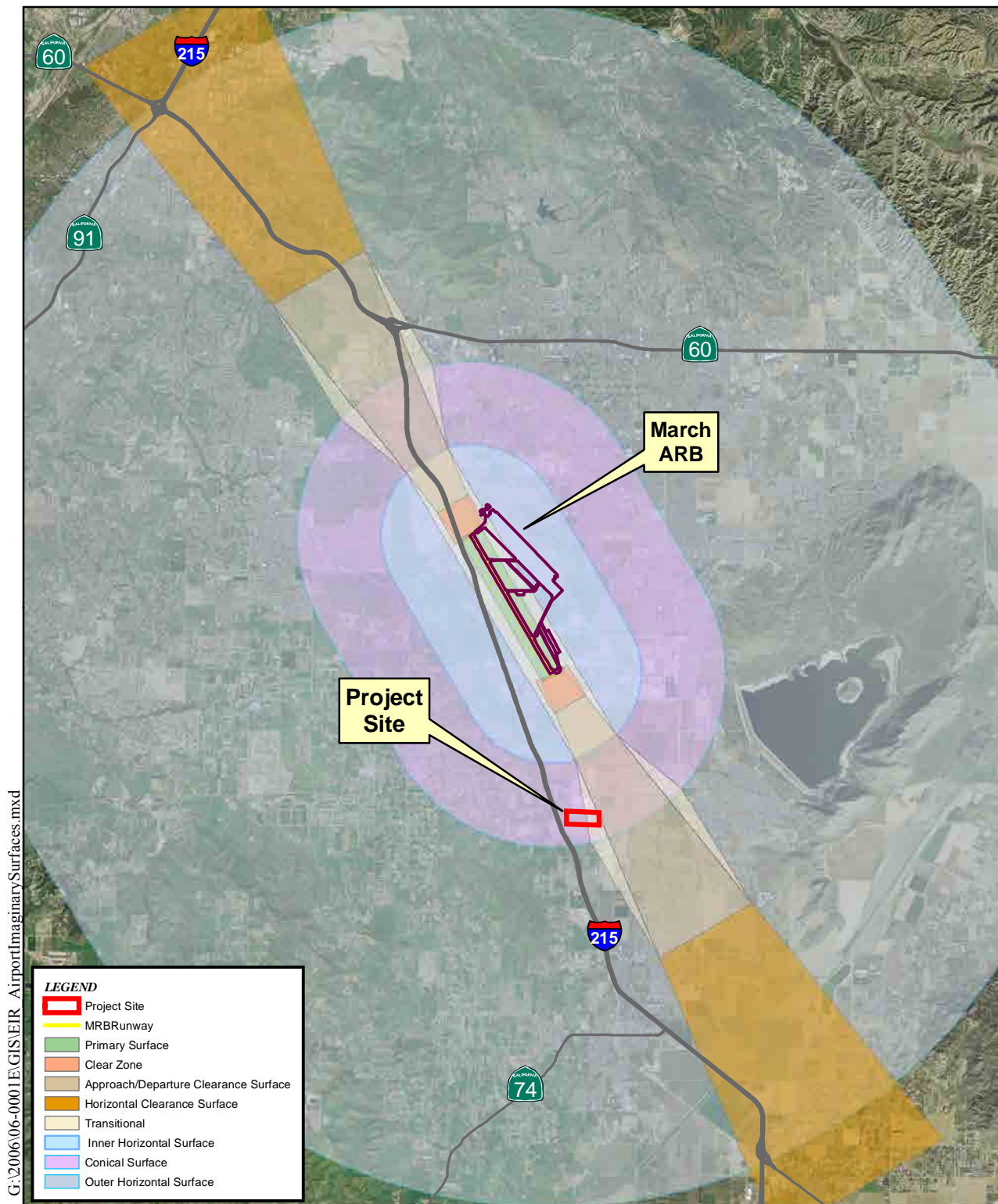


Figure 4.2-3
March Air Reserve
Base Flight Tracks



Height limitations are not anticipated to pose a development constraint for the Rados Distribution Center – Perris site. Section D.1 of the 2005 MARB AICUZ Study's Appendices describes the height and obstruction criteria for land uses around the airfield pursuant to Part 77. This section states that the Conical Surface is an inclined surface extending outward and upward from the outer periphery of the inner horizontal surface for a horizontal distance of 7,000 feet to a height of 500 feet above the established airfield elevation. Transitional Surfaces are described as having a slope of 7:1 outward and upward to an altitude of 150 feet above aircraft elevation at right angles to the runway centerline. Section D.1 states that the established airfield elevation at MARB is 1,535 feet above mean sea level (msl) (**Figure 4.2-4, FAR Part 77 Imaginary Surfaces**). The elevations at the project site range between approximately 1,470 and 1,490 feet msl. The proposed project will have a maximum building height of approximately 44 feet and when added to the project site's ground elevation should not exceed the MARB airfield elevation of 1,535 feet msl. Therefore, in consideration of the building heights allowed above the established airfield elevation by the height and obstruction criteria applicable to the Conical Surface and Transitional Surfaces areas, the proposed project will be below the Part 77 height limits.

Although structures will be below the Part 77 height limits, Part 77, Section 77.13.2.i requires that any construction or alteration of greater height than an imaginary surface extending upward and outward at a 100 to 1 slope from the nearest point of the runway will require the preparation of FAA Notice of Proposed Construction or Alteration (FAA Form 7460-1). This notice must be submitted to the FAA at least 30 days before the date the proposed construction or alteration is to begin or the date the application for a construction permit will be filed, whichever is earlier. Notwithstanding the established airfield elevation set forth in the MARB AICUZ study, the elevation of the runway at its nearest point to the project is 1,488 msl. Therefore, depending on the elevation of the finished grade and height of the proposed structure, project development may encroach into this 100 to 1 slope imaginary surface and will require the filing of Form 7460-1 with the FAA. If a hazard to air navigation is identified, then the FAA will issue a determination of hazard to air navigation. However, the FAA does not have the authority to prevent encroachment; it is up to the local land use authority to enforce the recommendation.

Airport Safety Compatibility Guidelines

The 1984 Riverside County ALUP establishes three airport safety zones (Area I, Area II, and Area III). The Rados Distribution Center – Perris project is located within Area II (**Figure 4.2-1, March ARB Influence Areas**). There are two policies within the 1984 ALUP related to safety considerations.

The 1984 ALUP states that:

- Area I shall be kept free of all high-risk land uses. Residential development (2½ acre lot size and larger) will be permitted only within areas designated by the ALUC to be so far removed from the actual flight paths or to be in areas where aircraft will have gained sufficient altitude that they no longer pose a relative safety threat, should in-flight problems occur.

- Area II shall have a minimum residential lot size of 2½ acres. Agricultural, industrial and commercial uses are acceptable in this area.

The proposed project's land use is permitted within Area II as described in the 1984 ALUP.

Additional guidelines regarding protection of airport airspace are set forth in other FAA documents. In general, these criteria specify that no use of land or water anywhere within the boundaries encompassed by FAR Part 77 should be allowed if it could endanger or interfere with the landing, take off, or maneuvering of an aircraft at an airport. Specific characteristics to be avoided include:

- Creation of electrical interference with navigational signals or radio communication between the airport and aircraft;
- Lighting which is difficult to distinguish from airport lighting;
- Glare in the eyes of pilots using the airport;
- Smoke or other impairments to visibility in the airport vicinity; and
- Uses which attract birds and create bird strike hazards.

These restrictions have been incorporated into the below-listed mitigation measure **MM Airports 3**.

With respect to accident potential, the 2005 AICUZ Study identifies a Clear Zone and two APZs based on the landing threshold for each runway. Within the Clear Zones, most land uses are incompatible with aircraft operations. Within the APZs, a variety of land uses are compatible, however, people-intensive uses are restricted because of the greater risk in these areas. Outside of the Clear Zones and APZs, the risk of aircraft accidents is not significant to warrant special consideration in land use planning. The proposed project is not located within a Clear Zone or within the APZs.

The entire project site is located within the MARB Influence Areas. The applicable documents for determining land use compatibility around MARB are the March 2005 AICUZ Study, the 1984 ALUP and the 1986 Airport Influence Area Map. As described above, the proposed project is consistent with the Area II compatibility guidelines set forth in those documents.

Notwithstanding the proposed project's compatibility with MARB, the project's compliance with Federal, State and County regulations and guidelines, outdoor lighting has the potential to adversely affect pilots utilizing MARB at night. These potential impacts will be reduced to **below the level of significance** through implementation of the below-listed mitigation measures.

Proposed Mitigation Measures

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (CEQA Guidelines, Section 15126.4). Mitigation measures were evaluated for their ability to eliminate or reduce the potential significant adverse impacts related to airports to below the level of significance.

MM Airport 1: All street lights and other outdoor lighting shall be hooded or shielded to prevent either the spillage of lumens or reflection into the sky or above the horizontal plane.

MM Airport 2: The following notice shall be provided to all potential purchasers and tenants:

“This property is presently located in the vicinity of an airport, within what is known as an airport influence area. For that reason, the property may be subject to some of the annoyances or inconveniences associated with proximity to airport operations (for example, noise, vibration, or odors). Individual sensitivities to those annoyances can vary from person to person. You may wish to consider what airport annoyances, if any, are associated with the property before you complete your purchase and determine whether they are acceptable to you. Business & Profession Code 11010 12(A)”

MM Airport 3: The following uses shall be prohibited:

- (a) Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than an FAA-approved navigational signal light or visual approach slope indicator.
- (b) Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an aircraft engaged in a straight final approach towards a landing at an airport.
- (c) Any use which would generate smoke or water vapor or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area.
- (d) Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.

MM Airport 4: Prior to recordation of a final map, issuance of building permits, or conveyance to an entity exempt from the Subdivision Map Act, whichever occurs first, the landowner shall convey an aviation easement to March Air Reserve Base.

Summary of Environmental Effects After Mitigation Measures Are Implemented

All potential direct impacts of the project are considered to be less than significant with the above mitigation measure incorporated.

4.3 AIR QUALITY

The focus of the following discussion is related to the potential impacts from the project, consistency with applicable air quality plans, compliance with air quality standards, cumulative increases of criteria air pollutants, exposing sensitive receptors to substantial point source emissions, and the production of odors. The Air Quality Impact Analysis (AQIA) prepared for this project (Appendix B) evaluated whether the expected criteria air pollutant emissions generated as a result of construction and long-term operations (i.e., vehicle emissions) of the proposed project would cause significant impacts to air resources in the project area. The AQIA was conducted within the context of CEQA. The methodology follows the *CEQA Air Quality Handbook* (1993) prepared by the South Coast Air Quality Management District (SCAQMD) for quantification of emissions and evaluation of potential impacts to air resources. As recommended by SCAQMD staff, the URBEMIS 2007 for Windows version 9.2.4 computer program was used to quantify project-related emissions. The Health Risk Assessment (HRA) prepared for this project (Appendix C) evaluated the impacts to the existing and future residents in the project vicinity from diesel particulate matter from trucks serving the project site. Information regarding the methodologies used in the HRA can be found in the body of the report in Appendix B. In addition, the AQIA prepared for this project includes emissions estimates for project-generated greenhouse gases (GHG) during both construction and operation.

In addition to other reference documents, the following references were used in the preparation of this section of this DEIR:

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Setting

Physical Setting

The proposed project site is located within the South Coast Air Basin (SCAB), which is under the jurisdiction of the SCAQMD. The SCAB consists of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. Regional and local air quality within the SCAB is affected by topography, atmospheric inversions, and dominant onshore flows. Topographic features such as the San Gabriel, San Bernardino, and San Jacinto Mountains form natural horizontal barriers to the dispersion of air contaminants. The presence of atmospheric inversions limits the vertical dispersion of air pollutants. With an inversion, the temperature initially follows a normal pattern of decreasing temperature with increasing altitude; however, at some elevations, the trend reverses and temperature begins to increase as altitude increases. This transition to increasing temperature establishes the effective mixing height of the atmosphere and acts as a barrier to vertical dispersion of pollutants.

Dominant onshore flow provides the driving mechanism for both air pollution transport and pollutant dispersion. Air pollution generated in coastal areas is transported east to inland receptors by the onshore flow during the daytime until a natural barrier (the mountains) is confronted, limiting the horizontal dispersion of pollutants. The result is a gradual degradation of air quality from coastal areas to inland areas, which is most evident with the photochemical pollutants such as ozone formed under reactions with sunlight.

Climate

Terrain and geographical location determine climate in the SCAB. The project site lies within the terrain south of the San Gabriel and San Bernardino Mountains and north of the Santa Ana Mountains. The climate in the SCAB is typical of southern California's Mediterranean climate, which is characterized by dry, warm summers and mild winters. Winters typically have infrequent rainfall, light winds, and frequent early morning fog and clouds that turn to hazy afternoon sunshine.

The following includes factors that govern micro-climate differences among inland locations within the SCAB: 1) the distance of the mean air trajectory from the site to the ocean; 2) the site elevation; 3) the existence of any intervening terrain that may affect airflow or moisture content; and 4) the proximity to canyons or mountain passes. As a general rule, locations farthest inland from the ocean have the hottest summer afternoons, the lowest rainfall, and the least amount of fog and clouds. Foothill communities in the SCAB have greater levels of precipitation, cooler summer afternoons and may be exposed to wind funneling through nearby canyons during Santa Ana winds. Terrain will generally steer local wind patterns. The project site is located within the City of Perris, east of the I-215 freeway, south of SR-60, and east of Lake Perris State Recreational Area, within the eastern portion of the SCAB.

Precipitation and Temperature

Annual average temperatures in the SCAB are typically in the low to mid-60s (degrees Fahrenheit). Temperatures above 100 degrees are recorded for all portions of the SCAB during the summer months.

The rainy season in the SCAB is November to April. Summer rainfall can occur as widely scattered thunderstorms near the coast and in the mountainous regions in the eastern SCAB. Rainfall averages vary over the SCAB. For example, the City of Riverside averages 9 inches of rainfall, while the City of Los Angeles averages 14 inches. Rainy days vary from 5 to 10 percent of all days in the SCAB, with the most frequent occurrences of rainfall near the coast.

Winds

The interaction of land (offshore) and sea (onshore) breezes control local wind patterns in the area. Daytime winds typically flow from the coast to the inland areas, while the pattern typically reverses in the evening, flowing from the inland areas to the ocean. Air stagnation may occur in the early evening and early morning during periods of transition between day and nighttime flows.

Approximately 5 to 10 times a year, the project site vicinity experiences strong, hot, dry desert winds known as the Santa Ana winds. These winds, associated with atmospheric high pressure, originate in the upper deserts and are channeled through the passes of the San Bernardino Mountains and into the inland valleys. Santa Ana winds can last for a period of hours or days, and gusts of over 60 miles per hour have been recorded.

High winds, such as the Santa Ana winds, affect dust generation characteristics and create the potential for off-site air quality impacts, especially with respect to airborne nuisance and particulate emissions. Local winds in the project area are also an important meteorological parameter because they control the initial rate of dilution of locally-generated air pollutant emissions.

Categories of Emission Sources

Air pollutant emissions sources are typically grouped into two categories: stationary and mobile sources. These emission categories are defined and discussed in the following subsections.

Stationary Sources

Stationary sources are divided into two major subcategories: point and area sources. Point sources consist of a single emission source with an identified location at a facility. A single facility could have multiple point sources located on-site. Stationary point sources are usually associated with manufacturing and industrial processes. Examples of point sources include boilers or other types of combustion equipment at oil refineries, electric power plants, etc. Area sources are small emission sources that are widely distributed, but are cumulatively substantial because there may be a large number of sources. Examples include residential water heaters;

painting operations; lawn mowers; agricultural fields; landfills; and consumer products, such as barbecue lighter fluid and hair spray.

Mobile Sources

Mobile sources are motorized vehicles, which are classified as either on-road or off-road. On-road mobile sources typically include automobiles and trucks that operate on public roadways. Off-road mobile sources include aircraft, ships, trains, and self-propelled construction equipment that operate off public roadways. Mobile source emissions are accounted for as both direct source emissions (those directly emitted by the individual source) and indirect source emissions, which are sources that by themselves do not emit air contaminants but indirectly cause the generation of air pollutants by attracting vehicles. Examples of indirect sources include office complexes, commercial and government centers, sports and recreational complexes, and residential developments.

Air Pollution Constituents

Criteria Pollutants

Air pollutants are classified as either primary, or secondary, depending on how they are formed. Primary pollutants are generated daily and are emitted directly from a source into the atmosphere. Examples of primary pollutants include carbon monoxide (CO), nitrogen dioxide (NO₂) and nitric oxide (NO)—collectively known as oxides of nitrogen (NO_x), sulfur dioxide (SO₂), particulates (PM-10 and PM-2.5) and various hydrocarbons (HC) or volatile organic compounds (VOC), which are also referred to as reactive organic gases (ROG). The predominant source of air emissions generated by the project development is expected to be vehicle emissions. Motor vehicles primarily emit CO, NO_x, and VOC/ROG/HC (Volatile Organic Compounds/Reactive Organic Gases/Hydrocarbons).

Secondary pollutants are created over time and occur within the atmosphere as chemical and photochemical reactions take place. An example of a secondary pollutant is ozone (O₃), which is one of the products formed when NO_x reacts with HC, in the presence of sunlight. Other secondary pollutants include photochemical aerosols. Secondary pollutants such as ozone represent major air quality problems in the SCAB.

The Federal Clean Air Act of 1970 established the National Ambient Air Quality Standards (NAAQS). Six “criteria” air pollutants were identified using specific medical evidence available at that time, and NAAQS were established for those chemicals. The State of California has adopted the same six chemicals as criteria pollutants, but has established different allowable levels. The six criteria pollutants are: carbon monoxide, nitrogen dioxide, ozone, lead, particulates less than 10 microns in size, and sulfur dioxide. The following is a further discussion of the *criteria pollutants*, as well as volatile organic compounds.

- **Carbon Monoxide (CO)** – A colorless, odorless toxic gas produced by incomplete combustion of carbon-containing substances. Concentrations of CO are generally higher during the winter months when meteorological conditions favor the build-up of primary pollutants. Automobiles are the major source of CO in the Basin, although various industrial

processes also emit CO through incomplete combustion of fuels. In high concentrations, CO can cause serious health problems in humans by limiting the red blood cells' ability to carry oxygen (SCAQMD 1993).

- **Oxides of Nitrogen (NO_x)** – Those that are important in air pollution are nitric oxide (NO) and nitrogen dioxide (NO₂). NO is a colorless, odorless gas formed by a combination of nitrogen and oxygen when combustion takes place under high temperatures and pressures. NO₂ is a reddish-brown gas formed by the combination of NO with oxygen. Combustion in motor vehicle engines, power plants, refineries and other industrial operations, as well as ships, railroads, and aircraft are the primary sources of NO_x. NO₂ at atmospheric concentrations is a potential irritant that can cause coughing in healthy people; can alter respiratory responsiveness and pulmonary functions in people with preexisting respiratory illness; and potentially lead to increased levels of respiratory illness in children (EPA 2005).
- **Ozone (O₃)** – A colorless, toxic gas that irritates the lungs and damages materials and vegetation. During the summer's long daylight hours, plentiful sunshine provides the energy needed to fuel photochemical reactions between NO₂ and VOC which result in the formation of O₃. Conditions that lead to high levels of O₃ are adequate sunshine, early morning stagnation in source areas, high surface temperatures, strong and low morning inversions, greatly restricted vertical mixing during the day, and daytime subsidence that strengthens the inversion layer (all of which are characteristic of western Riverside County). Ozone represents the worst air pollution-related health threat in the Basin as it affects people with preexisting respiratory illness, as well as, reduces lung function in healthy people. Studies have shown that children living within the Basin experience a 10–15 percent reduction in lung function (SCAQMD 1993).
- **Atmospheric Particulate Matter (PM)** – Made up of fine solid and liquid particles, such as soot, dust, aerosols, fumes, and mists. PM-10 consists of particulate matter that is 10 microns or less in diameter, and PM-2.5 consists of particulate matter of 2.5 microns or less in size. Both PM-10 and PM-2.5 can be inhaled into the deepest part of the lung, attributing to health effects. The presence of these fine particles by themselves cause lung damage and interfere with the body's ability to clear its respiratory tract. Said particles can also act as a carrier of other toxic substances (SCAQMD 1993). The sources contributing to particulate matter pollution include: road dust, windblown dust, agriculture, construction, fireplaces and wood burning stoves, and vehicle exhaust. Specifically, SCAQMD data indicates that the largest component of PM-10 particles in the area comes from dust (unpaved roads, unpaved yards, agricultural lands, and vacant land that has been disked). PM-2.5 particles are mostly manmade particles resulting from combustion sources. According to SCAQMD, one component of PM-2.5 pollution in Riverside comes from ammonium nitrate (NH₄NO₃) particulates. NO_x, emitted throughout the SCAB by vehicles, reacts with ammonia produced from livestock and horses to form ammonium nitrate. Organic carbon particles generated from paints, degreasers, and vehicles are another component of PM-2.5 pollution. The last notable constituent of PM-2.5 sources is elemental carbon, which is used as a surrogate for diesel particulates.
- **Sulfur dioxide (SO₂)** – A colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. SO₂ can result in temporary breathing impairment in asthmatic children and adults engaged in active outdoor activities. When combined with PM, SO₂ can

cause symptoms such as shortness of breath and wheezing; and, with long-term exposure, it can lead to the exacerbation of existing cardiovascular disease and respiratory illnesses (EPA 2005). Although SO₂ concentrations have been reduced to levels well below state and federal standards, further reductions in SO₂ emissions are needed because SO₂ is a precursor to sulfate and PM-10.

- **Lead (Pb)** – Lead concentrations once exceeded the state and federal air quality standards by a wide margin, but have not exceeded state or federal air quality standards at any regular monitoring station since 1982. Health effects associated with lead include neurological impairments, mental retardation, and behavioral disorders. At low levels, lead can damage the nervous systems of fetuses and result in lowered IQ levels in children (EPA 2005). Though special monitoring sites immediately downwind of lead sources recorded very localized violations of the state standard in 1994, no violations have been recorded at these stations since 1996. Unleaded gasoline has greatly contributed to the reduction in lead emissions in the Basin. Since the proposed project will not involve leaded gasoline, or other sources of lead emissions, this criteria pollutant is not expected to be a factor with project implementation.
- **Reactive Organic Gases/Volatile Organic Compounds (ROG/VOC)** - It should be noted that there are no state or federal ambient air quality standards for VOCs because they are not classified as criteria pollutants. VOCs are regulated; however, a reduction in VOC emissions reduces certain chemical reactions, which contribute to the formation of ozone. VOCs are also transformed into organic aerosols in the atmosphere, contributing to higher PM-10 and lower visibility levels. Although health-based standards have not been established for VOCs, health effects can occur from exposures to high concentrations of VOC because of interference with oxygen uptake. In general, ambient VOC concentrations in the atmosphere, even at low concentrations, are suspected to cause coughing, sneezing, headaches, weakness, laryngitis, and bronchitis. Some hydrocarbon components classified as VOC emissions are thought or known to be hazardous. Benzene, for example, is a hydrocarbon component of VOC emissions that is known to be a human carcinogen.

Toxic Air Contaminants

Toxic air contaminants (TACs) are chemicals generally referred to as “non-criteria” air pollutants which are known or suspected to cause serious health problems, but do not have a corresponding ambient air quality standard. There are hundreds of air toxics; and, exposure to these pollutants can cause or contribute to cancer or non-cancer health effects such as birth defects, genetic damage, and other adverse health effects. Effects may be both chronic (i.e., of long duration) or acute (i.e., severe but of short duration) on human health. Acute health effects are attributable to sudden exposure to high quantities of air toxics. These effects can include nausea, skin irritation, respiratory illness, and, in some cases, death. Chronic health effects usually result from low-dose, long-term exposure from routine releases of air toxics. The effect of major concern for this type of exposure is cancer, which typically requires a latency period of 10–30 years after exposure to develop.

In 2000, the SCAQMD released the Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES-II). The monitoring portion of MATES-II was designed to

measure numerous air toxic compounds at different locations in the Basin in order to establish a baseline of existing air toxic ambient concentrations, as well as risk level data; and to assist in the assessment of modeling performance accuracy. Ten sites were selected and air samples were collected for up to one year. The ten locations are in Anaheim, Burbank, Compton, Fontana, Huntington Park, Long Beach, Los Angeles, Pico Rivera, Rubidoux, and Wilmington. Rubidoux is the nearest monitoring site and is approximately ten miles northeast of the proposed project.

In January 2008, the SCAQMD released the Draft Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES-III). The draft report was in a 90-day public review with a comment period, which ended April 4, 2008. The Final report was released in September 2008. The ten monitoring sites listed above remained the same for the MATES-III study, with the exception of the Wilmington Station moving 2.5 miles east.

The addition of diesel particulate toxicity dramatically increases carcinogenic risk. The modeled cancer risk for diesel particulates for the Rubidoux site is approximately 1,000 cases of cancer per one million people. The MATES-III results show that the modeled cancer risk from emissions of diesel particulates at the Rubidoux Station is approximately 950 in one million. It should be noted that different methods were used to estimate diesel particulate levels in the MATES-III Study; so, the results are not strictly comparable. This cancer risk is what residents are currently exposed to in that portion of the Basin. The Rubidoux Station location is less than a half-mile south of SR-60 and approximately seven miles east of I-15. Therefore, the Rubidoux Station is approximately 16 miles northwest of the project site. In addition to the results for the specified monitoring sites, the MATES-III document also shows the estimated regional cancer risk for the entire Basin. It shows that the area surrounding the project site has a modeled cancer risk approximately 532 cases of cancer per one million people. Therefore, existing conditions in the project area are less impacted by diesel emissions as opposed to the area surrounding the Rubidoux Monitoring Station.

Diesel Emissions

Diesel engines utilize compression, contrary to standard gasoline engines, which use conventional spark plugs, to ignite fuel. Engines that use compression typically run at higher temperatures than gasoline engines, thereby causing the oxygen and nitrogen present in air during intake, to form NO_x. To combat NO_x production in a diesel engine, the engine temperature can be reduced; however, increased amounts of PM and hydrocarbons (HC) are produced as byproducts of the now uncombusted fuel. Hydrocarbons, once in the atmosphere, react with NO_x to produce ozone, among other pollutants.

Diesel exhaust composition is dependent on many factors: fuel composition, engine type, lubricating oils, and emission control systems. Diesel exhaust is a complex mixture of thousands of gases and fine particles. The gaseous fraction of diesel exhaust is comprised of typical combustion gases such as oxygen, carbon dioxide, nitrogen, and water vapor. However, air pollutants such as carbon monoxide, sulfur oxides (SO_x), NO_x, volatile hydrocarbons, and low-molecular weight polycyclic aromatic hydrocarbons (PAH) and PAH-derivatives are also components of the gaseous fraction. Additionally, some of the gaseous components, such as benzene, are known carcinogens.

The particle fraction of diesel exhaust is comprised of aggregates of carbon particles with inorganic and organic substances adhered to them. The inorganic fraction of diesel exhaust particles consists of solid carbon (or elemental carbon) particles ranging in size from 0.01 to 0.08 microns in diameter. The organic fraction consists of soluble organic compounds such as aldehydes, alkanes, alkenes, PAH, and PAH derivatives. The total component of a diesel particle (inorganic + organic) is in the fine particle range of 10 microns in size or less (width of a human hair), but 92 percent of these diesel particles are even smaller, at less than 1 micron in diameter.

Diesel particles can remain airborne for up to 10 days because of their small size. Therefore, they do not fall out or precipitate easily, and remain an air quality problem for some time after being emitted. Scientists use elemental carbon as a surrogate since there is no current technology available to monitor directly for diesel particles. It is important to understand that the cancer risks estimated by the California Air Resources Board (CARB) related to mobile-source diesel exhaust and health risk assessment studies represent the probability that a person develops cancer; the estimated risks do not represent mortality rates.

Greenhouse Gases and Global Climate Change

Some gases in the atmosphere affect the Earth's heat balance by absorbing infrared radiation. This layer of gases in the atmosphere functions much the same as glass in a greenhouse (i.e., both prevent the escape of heat). This is why global warming is also known as the "greenhouse effect." Increased emissions of these gases, due to combustion of fossil fuels and other activities, have increased the greenhouse effect, leading to global warming and other climate changes. Gases responsible for global climate change in the South Coast Air Basin and their relative contribution to the overall warming effect are carbon dioxide (55 percent), CFCs (24 percent), methane (15 percent), and nitrous oxide (6 percent) (SCAQMD 2005). It is widely accepted that continued increases in greenhouse gases (GHG) will contribute to global climate change although there is uncertainty concerning the magnitude and timing of future emissions and the resultant warming trend (SCAQMD 2005). Human activities associated with industrial/manufacturing, utilities, transportation, residential, and agricultural sectors contribute to these GHG (CEC 2006a). According to the California Energy Commission (CEC), transportation was responsible for 41 percent of the state's GHG emissions, followed by electricity generation in 2004 (CEC 2006a). More recently, CARB reported that transportation was 38 percent of the state's GHG emissions, followed by electricity generation in 2004 (CARB 2007). Emissions of carbon dioxide (CO₂) and nitrous oxide (N₂O) are byproducts of fossil fuel combustion. Methane, a highly potent GHG, results from off-gassing associated with agricultural practices, landfills, and wastewater treatment.

"Stratospheric ozone depletion" refers to the slow destruction of naturally occurring ozone, which lies in the upper atmosphere (called the stratosphere) and which protects Earth from the damaging effects of solar ultraviolet radiation. Certain compounds, including chlorofluorocarbons (CFCs) halons, carbon tetrachloride, methyl chloroform, and other halogenated compounds, accumulate in the lower atmosphere and then gradually migrate into the stratosphere. In the stratosphere, these compounds participate in complex chemical reactions to destroy the upper ozone layer. Destruction of the ozone layer increases the penetration of ultraviolet radiation to the Earth's surface, a known risk factor that can increase the incidence of

skin cancers and cataracts, contribute to crop and fish damage, and further degrade air quality (SCAQMD 2005).

GHG and ozone-depleting gases include, but are not limited to, the following:

- **Carbon dioxide** – Carbon dioxide results from fossil fuel combustion in stationary and mobile sources. It contributes to the greenhouse effect, but not to stratospheric ozone depletion. In 2004, carbon dioxide accounted for approximately 84 percent of total GHG emissions in the state (CEC 2006a). In the Basin, approximately 48 percent of carbon dioxide emissions come from transportation, residential, and utility sources, which contribute approximately 13 percent each, 20 percent come from industry, and the remainder comes from a variety of other sources (SCAQMD 2005).
- **Methane** – Atmospheric methane is emitted from both non-biogenic and biogenic sources. Non-biogenic sources include fossil fuel mining and burning, biomass burning, waste treatment, geologic sources, and leaks in natural gas pipelines. Biogenic sources include wetlands, rice agriculture, livestock, landfills, forest, oceans, and termites. Methane sources can also be divided into anthropogenic and natural. Anthropogenic sources include rice agriculture, livestock, landfills, waste treatment, some biomass burning, and fossil fuel combustion. Natural sources are wetlands, oceans, forests, fire, termites, and geological sources. Anthropogenic sources currently account for more than 60 percent of the total global emissions. It is a greenhouse gas and traps heat 40–70 times more effectively than carbon dioxide. (SCAQMD 2005) In the Basin, more than 50 percent of human-induced methane emissions come from natural gas pipelines, while landfills contribute 24 percent. Methane emissions from landfills are reduced by SCAQMD Rule 1150.1 – Control of Gaseous Emissions from Active Landfills. Methane emissions from petroleum sources are reduced by a number of rules in SCAQMD Regulation XI that control fugitive emissions from petroleum production, refining, and distribution (SCAQMD 2005).
- **Other regulated greenhouse gases include Nitrous Oxide, Sulfur Hexafluoride, Hydrofluorocarbons, and Perfluorocarbons** – These gases all possess heat-trapping potentials hundreds to thousands of times more effective than carbon dioxide. Emission sources of nitrous oxide gases include, but are not limited to, waste combustion, wastewater treatment, fossil fuel combustion, and fertilizer production. Because the volume of emissions is small, the net effect of nitrous oxide emissions relative to carbon dioxide or methane is relatively small. Sulfur hexafluoride, hydrofluorocarbon, and perfluorocarbon emissions occur at even lower rates.
- **Chlorofluorocarbons** – Chlorofluorocarbons (CFCs) are emitted from blowing agents used in producing foam insulation. They are also used in air conditioners and refrigerators and as solvents to clean electronic microcircuits. CFCs are primary contributors to stratospheric ozone depletion and to global warming. Sixty-three percent of CFC emissions in the Basin come from the industrial sector. Federal regulations require service practices that maximize recycling of ozone-depleting compounds (both CFCs, hydro-chlorofluorocarbons and their blends) during the servicing and disposal of air-conditioning and refrigeration equipment. SCAQMD Rule 1415 – Reduction of Refrigerant Emissions from Stationary Refrigeration and Air Conditioning Systems requires CFC refrigerants to be reclaimed or recycled from

stationary refrigeration and air conditioning systems. SCAQMD Rule 1405 – Control of Ethylene Oxide and Chlorofluorocarbon Emissions from Sterilization or Fumigant Processes requires recovery of reclamation of CFCs at certain commercial facilities and eliminates the use of some CFCs in the sterilization processes. Some CFCs are classified as TACs and regulated by SCAQMD Rule 1401 – New Source Review of Toxic Air Contaminants and SCAQMD Rule 1402 Control of Toxic Air Contaminants from Existing Sources.

- **Halons** – These compounds are used in fire extinguishers and behave as both ozone-depleting and greenhouse gases. Halon production ended in the United States in 1993. SCAQMD Rule 1418 – Halon Emissions from Fire Extinguishing Equipment requires the recovery and recycling of halons used in fire extinguishing systems and prohibits the sale of halon in small fire extinguishers.
- **Hydro-chlorofluorocarbons** – HCFCs are solvents, similar in use and chemical composition to CFCs. The hydrogen component makes HCFCs more chemically reactive than CFCs, allowing them to break down more quickly in the atmosphere. These compounds deplete the stratospheric ozone layer, but to a much lesser extent than CFCs. HCFCs are regulated under the same SCAQMD rules as CFCs.
- **1,1,1-trichloroethane (TCA)** – TCA (methyl chloroform) is a solvent and cleaning agent commonly used by manufacturers. It is less destructive on the environment than CFCs or HCFCs, but its continued use will contribute to global warming and ozone depletion. 1,1,1-trichloroethane (TCA) is a synthetic chemical that does not occur naturally in the environment. No TCA is supposed to be manufactured for domestic use in the United States after January 1, 2002 because it affects the ozone layer. TCA had many industrial and household uses, including use as a solvent to dissolve other substances, such as glues and paints; to remove oil or grease from manufactured metal parts; and as an ingredient of household products such as spot cleaners, glues, and aerosol sprays. SCAQMD regulates this compound as a toxic air contaminant under Rules 1401 and 1402.

As emissions of GHGs increase, temperatures in California are projected to rise significantly over the twenty-first century. The modeled magnitudes of the warming vary because of uncertainties in future emissions and in the climate sensitivity. According to the California Climate Change Center (CEC 2005), there are three projected warming scenarios referred to as the low, medium, and high range. These expected increases from 2000 to 2100 vary from approximately 1.7°C–3.0°C (3.0°F–5.4°F) in the lower range of projected warming, 3.1°C–4.3°C (5.5°F–7.8°F) in the medium range, and 4.4°C–5.8°C (8.0°F–10.4°F) in the higher range. To comprehend the magnitude of these projected temperature changes over the next century, the lower range of projected temperature rise is slightly larger than the difference in annual mean temperature between Monterey and Salinas which is 2.5°F; and, the upper range of project warming is greater than the temperature difference between San Francisco and San Jose which is 7.4°F.

Other resource areas could be affected as a result of GHGs. For example, increased global average temperature will cause increases to ocean temperatures; and, the Pacific Ocean strongly influences the climate within California. As the temperature of the ocean warms, it is anticipated that rain will fall instead of snow in the Sierra Nevada during the wet season. Snowpack in the

Sierra Nevada provides both water supply (runoff) and storage (within the snowpack before melting), which is a major source of supply for the state. According to a California Energy Commission report, the snowpack portion of the supply could potentially decline by 70–90 percent by the end of the 21st century (CEC 2006b). This phenomenon could lead to significant challenges securing an adequate water supply for a growing population.

Some models indicate that the increased ocean temperature could result in increased moisture into the state; however, since this would likely increasingly come in the form of rain rather than snow in the high elevations, increased precipitation could lead to increased potential for flood events, placing more pressure on California’s levee/flood control system. Sea level has risen approximately 7 inches during the last century; and, according to the CEC report, it is predicted to rise an additional 22–35 inches by 2100, depending on the future GHG emissions levels (CEC 2006b), further straining the state’s water conveyance infrastructure.

Another impact of global warming is increased fire hazard. Fire is an important natural disturbance within many California ecosystems that promotes vegetation and wildlife diversity, releases nutrients, and eliminates heavy fuel accumulations that can lead to catastrophic burns. The changing climate could alter fire regimes in ways that could have social, economic, and ecological consequences. As the existing climate throughout California changes over time, mass migration of species, or worse, failure of species to migrate in time to adapt to the changes in climate, could also result.

Many factors contribute to an area being at risk of structural fire in terms of the local fire departments’ capabilities to control them, including the construction size and type, built-in protection, density of construction, street widths, and occupancy size. According to the City of Perris’s General Plan, the City has been identified as a “Community at Risk” from wildfires. A numerical estimate of the level of risk of “3” has been assigned to portions of the city, which represents highest level of risk. However, the project site is not located in a wildfire hazard area according to *Exhibit S-16: Wildfire Constraint Areas* within the City of Perris General Plan. The closest source of wildfire risk is the Motte Rimrock Reserve, which is approximately 0.75 miles southwest of the project site on the opposite side of Interstate 215 freeway from the project, and is classified as a wildfire hazard area.

Due to its weather, topography, and native vegetation, nearly all of southern California is at some risk from wildland fires also called wildfires. The extended droughts characteristic of California’s Mediterranean climate result in large areas of dry vegetation that provide fuel for wildland fires which can spread into urban areas. Wildland-urban fires occur when a fire burning in wildland vegetation gets close enough to ignite urban structures. Areas of dense, dry vegetation, particularly in canyon areas and hillsides, pose the greatest wildland fire potential.

Conservative estimates indicate that the risk of large statewide wildfires, characterized as approximately 500 acres or larger, would rise almost 35 percent by 2050 and 55 percent by 2100 under the medium temperature described previously. Under the low warming range, the increased risk of wildfires is nearly cut in half (CEC 2005).

Wildfires affect public safety and have the potential to significantly impact public health through smoke inhalation. For example, a survey of 26 percent of all tribal households on the Hoopa Valley National Indian Reservation in northern California showed a 52 percent increase in medical visits for respiratory problems during a large fire in 1999, compared to the same period of 1998. More than 60 percent of those surveyed reported an increase in respiratory symptoms during the smoke episode, and 20 percent continued to report increased respiratory symptoms two weeks after the smoke cleared. The projected increases in fire season severity could lead to more “bad air” days. However, quantitative estimation of the impacts of future wildfire events is extremely difficult. The impacts of any fire are unique to that event, and are influenced not only by the magnitude, intensity, and duration of the fire, but also the proximity of the smoke plume to a population (CEC 2005).

Climate change will affect the health of Californians by increasing the frequency, duration, and intensity of ambient conditions conducive to air pollution formation, oppressive heat, and wildfires. Not only are average temperatures expected to increase, but the projected increase in extreme temperatures is also expected to increase which can cause the most serious health impacts. The modeled warming scenarios indicate that the number of extremely hot and extremely cold days will increase by 2100. For Riverside/San Bernardino metropolitan areas, the number of extremely hot days will increase approximately 40 to 80 days per year under the lower and higher warming scenarios, respectively. Recent studies suggest that no capacity for future adaptation to extreme heat is seen in San Bernardino/Riverside metropolitan areas. The results for the San Bernardino/Riverside metropolitan areas actually indicate increased sensitivity during the hottest summers, which is counterintuitive to what might be expected in hot inland urban areas. Current investigations are underway seeking alternative explanations by taking greater account of socioeconomic factors (such as the availability of air conditioning, age structure of the population, and the housing stock) that might explain these non-intuitive results. If, for example, the San Bernardino/Riverside metropolitan area has a lesser proportion of air-conditioned residents than other hot inland urban areas, increased heat could create an indoor environment that is almost intolerable and could lead to greater numbers of deaths. It is clear that a thorough investigation of these socio-economic issues is necessary to understand the increased sensitivity of San Bernardino/Riverside metropolitan area residents to heat during the hottest summers (CEC 2006c).

Unlike criteria air pollutants and TACs, which are pollutants of regional and local concern, global warming is a global problem and GHGs are global pollutants. Impacts of GHG emissions are a function of their total atmospheric concentration and most GHGs are globally well mixed atmospheric constituents. This means that the location of a particular GHG emission, in contrast to the situation for criteria pollutants, does not change its environmental impact.

Globally, for the years 2000 through 2005, the annual average emissions of fossil fuel-related carbon dioxide was 26.4 gigatons of CO₂ (one gigaton equals one billion Mt) per year (IPCC). It should also be noted that the annual total U.S. emissions of GHG dropped 1.5 percent in 2006 from 7,181 million Mt to 7,075 million Mt, due to warmer weather and decreased energy demand, according to the Energy Information Administration (EIA). During the same timeframe, the U.S. economic output increased 2.9 percent (EIA). This decline results in a GHG intensity reduction of 4.2 percent as a measure of gross domestic product (EIA).

Worldwide, California is the 12th to 16th largest emitter of CO₂, and is responsible for approximately two percent of the world's CO₂ emissions (CEC 2006a). In 2004, the most recent year for which statewide data is available, the CEC reported that California produced 492 million gross metric tonnes (one metric tonne equals 2,205 pounds) of carbon dioxide-equivalent (CEC 2006a). However, California is the second largest emitter of greenhouse gases in the United States next to Texas, which generates about twice the amount of emissions (CEC 2006a). When considering fossil fuel emissions at the individual person level, California is second lowest in the nation in per capita CO₂ emissions with only the District of Columbia lower (CEC 2006a).

In January 2007, Assembly Bill 1803 transferred responsibility for developing and maintaining the state's GHG inventory from the California Energy Commission (CEC) to CARB. Using the CEC GHG inventory as a starting point, CARB staff determined the state's 1990 GHG emissions level by conducting a comprehensive review of all GHG emitting sectors. The seven sectors are: Transportation, Electricity Generation, Industrial, Residential, Agriculture, Commercial, and Forestry.

In November 2007, the CARB released its staff report establishing a statewide 1990 GHG emission level and a 2020 emission limit (CARB 2007). As part of this staff report, CARB staff recommended an amount of 427 million metric tonnes of carbon dioxide equivalent (MMTCO₂e) as the total statewide GHG 1990 emissions level and 2020 emissions limit. The Board approved the 2020 limit on December 6, 2007. This limit is an aggregated statewide limit, rather than sector- or facility-specific. The staff report also included the statewide GHG emissions for 2004, which were 480 MMTCO₂e.

While the inventory data numbers from the CEC and CARB are similar for 2004, these estimates have important differences. Emissions from individual sectors differ between CEC and CARB estimates by up to 30 percent due to updated data, methodologies, and differences in included and excluded emissions. Staff at CARB treated carbon stored in landfills differently than CEC by separately tracking stored carbon instead of considering it an emission sink within a landfill. In addition, the CARB estimate only includes intrastate aviation, whereas the CEC estimates include both interstate and intrastate flights. CARB staff also included emissions from international shipping and related port activities in California waters, whereas the CEC excluded all emissions from international ships.

Monitored Air Quality

The project site is located within SCAQMD Source Receptor Area (SRA) 24. The most recent published data for SRA 24 is presented in **Table 4.3-A, Air Quality Monitoring Summary – 1999-2008 (SRA 24)**. This data indicates that the baseline air quality conditions in the project area include occasional events of very unhealthy air. However, the frequency of smog alerts has dropped significantly in the last decade. Ozone and particulates are the two most significant air quality concerns in the project area. It is encouraging to note that ozone levels have dropped significantly in the last few years with approximately one-fifth or less days each year experiencing a violation of the state hourly ozone standard since 1999. Locally, no second stage alert (0.35 ppm/hour) has been called by SCAQMD in the last twenty years. In fact, the last second stage alert was in Upland in 1988.

The CARB established a new 8-hour average California Ozone standard of 0.07 ppm, effective May 17, 2006. The Federal 1-hour ozone standard was revoked and replaced by the 8-hour average ozone standard of 0.08 ppm effective in June 2005. The Federal 8-hour ozone standard was recently revised from 0.08 ppm to 0.075 ppm and became effective on May 27, 2008.

The California NO₂ standards were amended and approved by CARB on February 23, 2007, which lowered the 1-hour standard from 0.25 ppm to 0.18 ppm and established a new annual standard of 0.030 ppm. However, these standards only become effective once the California Office of Administrative Law (OAL) approves them. The proposed regulation to change the NO₂ standards was sent to the OAL in January 2008 and approved on February 19, 2008. The new standards became effective on March 20, 2008.

Monitoring for PM-2.5 did not begin until 1999. Since then, the annual standard has been consistently exceeded as shown in **Table 4.3-A**. The 1997 Federal Annual Average Standard for PM-2.5 (15 µg/m³) was upheld by the U.S. Supreme Court in February 2001. Effective in December 2006, the Federal 24-hour PM-2.5 standard was revised from 65 µg/m³ to 35 µg/m³. The state annual average standard for PM-2.5 (12 µg/m³) was finalized in 2003 and became effective on July 5, 2003. Additionally, the Federal Annual PM-10 Standard was revoked in December 2006.

Table 4.3-A, Air Quality Monitoring Summary (SRA 24) – 1999-2008

	Pollutant/Standard Source: SCAQMD	Monitoring Year									
		1999	2000	2001	2002	2003	2004	2005	2006	2007	2008
No. Days Exceeded	Ozone:										
	Health Advisory – 0.15 ppm	--	--	5	1	1	0	0	3	0	0
	California Standard:										
	1-Hour – 0.09 ppm	10	65	73	59	67	37	11	76	66	65
	8-Hour – 0.07 ppm ^a	--	--	--	--	--	47	18	84	88	94
	Federal Primary Standards:										
	8-Hour – 0.08 ppm (0.075 ppm) ^a	7	41	58	41	47	19	3	53	37(73)	41(77)
	Max 1-Hour Conc. (ppm)	0.11	0.16	0.152	0.147	0.155	0.128	0.126	0.17	0.139	0.142
	Max 8-Hour Conc. (ppm)	0.10	0.126	0.136	0.117	0.121	0.103	0.103	0.122	0.116	0.114
No. Days Exceeded	Carbon Monoxide^b:										
	California Standard:										
	1-Hour – 20 ppm	0	0	0	0	0	0	0	0	0	0
	8-Hour – 9.0 ppm	0	0	0	0	0	0	0	0	0	0
	Federal Primary Standards:										
	1-Hour – 35 ppm	0	0	0	0	0	0	0	0	0	0
	8-Hour – 9.0 ppm	0	0	0	0	0	0	0	0	0	0
	Max 1-Hour Conc. (ppm)	7.0	5.0	5.0	8.0	5	4	3	3	4	3
	Max 8-Hour Conc. (ppm)	4.4	4.3	3.4	3.0	3.7	3.0	2.5	2.1	2.9	2.0
No. Days Exceeded	Nitrogen Dioxide^b:										
	California Standard:										
	1-Hour – 0.18 ppm,	0	0	0	0	0	0	0	0	0	0
	Federal Standard:										
	Annual Arithmetic Mean (AAM) (ppm)	0.025	0.024	0.025	0.0240	0.022	0.017	0.022	0.020	0.021	0.019
	Max. 1-Hour Conc. (ppm)	0.13	0.10	0.15	0.10	0.09	0.09	0.08	0.08	0.07	0.09
No. Days Exceeded	Sulfur Dioxide^b:										
	California Standards:										
	1-Hour – 0.25 ppm	0	0	0	0	0	0	0	0	0	0
	24-Hour – 0.04 ppm	0	0	0	0	0	0	0	0	0	0
	Federal Primary Standards:										
	24-Hour – 0.14 ppm	0	0	0	0	0	0	0	0	0	0
	Annual Standard – 0.03 ppm ^d	No	No	No	No	No	No	No	No	No	No
	Max. 1-Hour Conc. (ppm)	0.03	0.11	0.02	0.02	0.02	0.02	0.02	0.01	0.02	0.01
	Max. 24-Hour Conc. (ppm)	0.011	0.041	0.011	0.002	0.012	0.015	0.011	0.004	0.002	0.003
No. Days Exceeded	Suspended Particulates (PM10):										
	California Standards:										
	24-Hour – 50 µg/m ³	30	13	16	24	19	15	19	19	32	12
	Federal Primary Standards:										
	24-Hour – 150 µg/m ³	0	0	0	0	0	0	0	0	0	0
	Annual Arithmetic Mean (µg/m ³) ^e	50.0	41.1	40.8	45.2	43.9	41.4	39.2	45.0	54.8	38.3
	Max. 24-Hour Conc. (µg/m ³)	112	87	86	100	142	83	80	125	120	85
No. Days Exceeded	Suspended Particulates (PM2.5)^b:										
	California and Federal Primary Standards:										
	24-Hour – 65 µg/m ³ (35µg/m ³) ^f	9	11	19	8	8	5	4	1(32)	3(33)	0(14)
	Annual Arithmetic Mean (µg/m ³) ^g	30.9	28.2	31.3	27.5	24.9	22.1	21.0	19.0	19.1	16.4
	Max. 24-Hour Conc. (µg/m ³)	111.2	119.6	98.0	77.6	104.3	91.7	98.7	68.5	75.7	57.7

Note -- No data available.

^a. 2004 is first year of SCAQMD records for state 8-hour Ozone standard.

^b. Metro Riverside County 1 air monitoring station (SRA 23) data summaries used.

^c. Federal NO₂ standard is AAM > 0.053; State NO₂ standard of AAM > 0.030 effective March 20, 2008.

^d. Yes or No indicating whether or not the standard has been exceeded for that year.

^e. Federal PM-10 standard is AAM > 50µg/m³ was revoked December 17, 2006. State standard is AAM > 20µg/m³, effective July 5, 2003.

^f. Federal 24-hour PM-2.5 standard changed to 35µg/m³ in 2006.

^g. Federal PM-2.5 standard is annual average (AAM) > 15µg/m³. State standard is annual average (AAM) > 12µg/m.

Related Regulations

Criteria Air Pollutants

The Federal and State Ambient Air Quality Standards (AAQS) establish the context for the local air quality management plans (AQMP) and for determination of the significance of a project's contribution to local or regional pollutant concentrations. Federal and State AAQS are presented in **Table 4.3-A**. The AAQS represent the level of air quality considered safe, with an adequate margin of safety, to protect the public health and welfare. They are designed to protect those people most susceptible to further respiratory distress such as asthmatics, the elderly, very young children, people already weakened by other diseases or illness, and persons engaged in strenuous work or exercise, all referred to as “sensitive receptors.” SCAQMD defines a “sensitive receptor” as a land use or facility such as schools, childcare centers, athletic facilities, playgrounds, retirement homes, and convalescent homes (SCAQMD 1993).

Both Federal and State Clean Air Acts require that each non-attainment area prepare a plan to reduce air pollution to healthful levels. The 1988 California Clean Air Act and the 1990 amendments to the Federal Clean Air Act (CAA) established new planning requirements and deadlines for attainment of the air quality standards within specified time frames which are contained in the State Implementation Plan (SIP). Amendments to the SIP have been proposed, revised, and approved over the past decade (SCAQMD 1993). The currently adopted clean air plan for the basin is the 1999 SIP Amendment, approved by the U.S. Environmental Protection Agency (EPA) in 2000.

The AQMP for the Basin establishes a program of rules and regulations directed at attainment of the state and national air quality standards. The AQMP control measures and related emission reduction estimates are based upon emissions projections for a future development scenario derived from land use, population, and employment characteristics defined in consultation with local governments. Accordingly, conformance with the AQMP for development projects is determined by demonstrating compliance with local land use plans and/or population projections. The SCAQMD adopted an updated AQMP in June 2007, which outlines the air pollution measures needed to meet federal health-based standards for particulates (PM-2.5) by 2014 and for ozone by 2023 (SCAQMD 2007). The AQMP was forwarded to the CARB and approved on September 27, 2007. It was sent to the EPA for its final approval and to be included as a revision to California’s SIP on November 16, 2007.

The CARB maintains records as to the attainment status of air basins throughout the state, under both state and federal criteria. The portion of the Basin within which the proposed project is located is designated as a non-attainment area for ozone, PM-10, and PM-2.5, under both state and federal standards.

The project will be required to comply with existing SCAQMD rules for the reduction of fugitive dust emissions. SCAQMD Rule 403 establishes these procedures. They include the application of water or chemical stabilizers to disturbed soils; managing haul road dust by application of water; covering all haul vehicles before transport of materials; restricting vehicle speeds on unpaved roads to 15 mph; and sweeping loose dirt from paved site access roadways used by

construction vehicles. In addition, it is required to establish a vegetative ground cover on disturbance areas that are inactive within 30 days after active operations have ceased. Alternatively, an application of dust suppressants can be applied in sufficient quantity and frequency to maintain a stable surface. Rule 403 also requires grading and excavation activities to cease when winds exceed 25 mph.

SCAQMD Rule 1113 governs the sale of architectural coatings and limits the volatile organic compounds (VOC) in paints and paint solvents. Although this rule does not directly apply to the project, it does dictate the VOC content of paints available for use during building construction.

In order to reduce natural gas and electricity consumption, building design shall comply with the energy efficiency requirements of Title 24 of the California Code of Regulations. Since natural gas use and electricity generation produce air emissions, a reduction in natural gas and electricity consumption results in a related reduction in air quality emissions.

Toxic Air Contaminants

Toxic Air Contaminants are regulated under both federal and state laws. Federally, the 1970 Amendments to the Clean Air Act included a provision to address air toxics. California regulates toxic air contaminants through its air toxics program, mandated in Chapter 3.5 (Toxic Air Contaminants) of the Health and Safety Code (H&SC § 39660, et seq.) and Part 6 Air Toxics “Hot Spots” Information and Assessment (H&SC § 44300, et seq.). The CARB, working in conjunction with the Office of Environmental Health Hazard Assessment (OEHHA), identifies toxic air contaminants. Air toxic control measures may then be adopted to reduce ambient concentrations of the identified toxic air contaminant below a specific threshold based on its effects on health, or to the lowest concentration achievable through use of best available control technology for toxics (T-BACT). The program is administered by the CARB. Air quality control agencies, including the SCAQMD, must incorporate air toxic control measures into their regulatory programs or adopt equally stringent control measures as rules within six months of adoption by CARB.

Diesel Regulations

In 1990, the State of California listed diesel exhaust as a known carcinogen under its Safe Drinking Water and Toxic Enforcement Act (Proposition 65). In 1998, the California Air Resources Board listed diesel particulate as a toxic air contaminant.

The CARB, a sub-agency of the California Environmental Protection Agency (Cal EPA), is taking the lead on addressing diesel emissions in the state of California. The first step to significantly reduce diesel emissions occurred in September 2000 when the CARB approved the “Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles” or Diesel Risk Reduction Plan. The two main goals of the Diesel Risk Reduction Plan are: 1) to get new diesel fueled engines to use state-of-the-art emission controls as well as low-sulfur diesel fuel and, 2) for existing diesel engines to be retrofitted with emission control features. Effects of meeting these goals set by the CARB would be reducing the health effects experienced by Californians from diesel exhaust.

Under the CARB's Diesel Risk Reduction Program, mobile diesel emissions have their own set of reduction programs, as opposed to stationary diesel sources (generators) which are addressed separately under the Reduction Plan. One of the incentive programs for mobile diesel sources is the Carl Moyer Program which is a clean engine incentive program. This program provides money in the form of grants to cover the incremental portion of the cost to purchase cleaner burning engines or retrofitting existing ones.

Other programs include a program designed to develop and implement strategies to reduce emissions from new on-road heavy-duty diesel engines. The primary method of implementing this program will be through the development of emission control regulations and test procedures for those new engines. The California Exhaust Emission Standards and Test Procedures for 2004 and Subsequent Model Heavy-Duty Diesel Engines and Vehicles were amended on October 17, 2007 and will reduce emission from new on-road heavy-duty diesel engines.

Strategies for reducing diesel emissions from existing on-road heavy duty engines will mainly be implemented through three sections of this program: retrofit assessment, heavy-duty testing, field support, and retrofit implementation. The CARB staff has developed regulations to reduce diesel particulate matter and other emissions from existing on-road heavy-duty diesel powered trucks and buses operating in California. These regulations were adopted by CARB on December 12, 2008. Beginning January 1, 2011, the Statewide Truck and Bus rule will require truck owners to install diesel exhaust filters on their rigs, with nearly all vehicles upgraded by 2014. Owners must also replace engines older than the 2010 model year according to a staggered implementation schedule that extends from 2012 to 2022. Also adopted on December 12 was the Heavy Duty Vehicle Greenhouse Gas Emission Reduction measure which requires long-haul truckers to install fuel efficient tires and aerodynamic devices on their trailers that lower greenhouse gas emissions and improve fuel economy.

Although the CARB will hand down programs and standards by which the SCAQMD can manage their jurisdiction for diesel emissions, the above programs are not regulations. Due to interstate commerce issues, regulating diesel emissions becomes not only a state level issue, but largely a federal issue. The SCAQMD is not responsible for direct regulation of mobile sources, including diesel trucks, except for publicly-owned fleets with 15 or more vehicles. The SCAQMD becomes involved in diesel issues because they are the permitting agency for stationary sources such as diesel generators and they are the agency responsible for implementing the Air Quality Management Plan for the South Coast Air Basin (Basin). Specifically, in the case of light industrial land uses, the SCAQMD does not have direct regulatory control over the diesel truck emissions traveling to and from these locations, but they do have the responsibility for implementing and managing air quality plans for the Basin in which these facilities will be operating.

In 2000, SCAQMD established a rule which mandated that whenever a public fleet operator with 15 or more vehicles replaces or purchases new vehicles, they must be either low-emission or alternatively fueled. The validity of this rule was challenged by the Engine Manufacturer's Association. The case was heard by the United States Supreme Court on January 14, 2004 and on April 28, 2004; the Supreme Court issued an opinion that under the Clean Air Act, SCAQMD and other local jurisdictions are prohibited from adopting regulations that require private fleet

owners to purchase clean-fueled vehicles. However, the court allowed the possibility that fleet rules can be applied to public fleets and may be valid for leased and used vehicles. SCAQMD's role in approval of light industrial land uses would be to provide guidance and recommendations on ways to address potential diesel emissions; but, they would not have regulatory authority over the diesel trucks using the proposed facilities.

In December 2000, the U.S. EPA announced its "Heavy-Duty Engine and Vehicle Standards and Highway Diesel Fuel Sulfur Control Requirements" (2007 Rule). This new rule required that new emission standards take effect in 2007 on new heavy duty engines and vehicles. The 2007 Rule standards are based on the use of emission control devices (much like the catalytic converters on gasoline automobiles). Coupled with the mechanical devices to control emissions which are not effective with the current high-sulfur diesel fuels on the market, the EPA also required diesel fuel to have 97 percent less sulfur content beginning in 2006.

As far as regulations, the state of California is on the forefront of making an attempt to regulate mobile-source diesel emissions. On February 1, 2005, a requirement limiting the idling of diesel-fueled commercial vehicles to five minutes at any location pursuant to Section 2485 of Chapter 10 within Title 13 of California Code of Regulations was adopted.

Off-road diesel vehicles are also regulated under CARB for both in-use (existing) and new engines. Off-road diesel vehicles include construction equipment.

There have been four sets of standards implemented by CARB, Known as Tiers. Tier 1 standards began in 1996. Tier 2 and 3 were adopted in 2000 and were more stringent than the first tier. Tier 2 and 3 standards were completely phased in by 2006 and 2008, respectively. On December 9, 2004, CARB adopted the Tier 4 or fourth phase of emission standards for late model year engines. These emission standards are nearly identical to those finalized by the U.S. EPA in May 2004. These standards will decrease PM and NO_x emissions to 90 percent below current levels, beginning in 2011.

Since most off-road vehicles today have no emission controls and can last 30 years or longer, CARB approved, on July 26, 2007, a regulation to reduce emission from existing off-road diesel vehicles used in construction and other industries. This regulation establishes emission rates targets that decline over time to accelerate turnover to newer, cleaner engines and requires exhaust retrofits to meet these targets. The regulation will affect the larger fleets first with average compliance dates in 2010; while medium and small fleet requirements will achieve compliance in 2013 and 2015, respectively. This regulation also includes the Surplus Off-Road Opt-in for NO_x (SOON) program. The local air districts may opt into the SOON program to reduce NO_x emissions beyond what is required by the regulation. Staff at SCAQMD proposed Rule 2449 which implements the SOON program. This rule was adopted at the May 2, 2008 board meeting. Opting in to this program is anticipated to achieve a 12 ton per day reduction in NO_x by 2014.

Greenhouse Gases

The Montreal Protocol on Substances That Deplete the Ozone Layer controls the phase-out of ozone depleting compounds (ODCs). Under this international agreement, several organizations report on the science of ozone depletion, implement projects to help move away from ODCs, and provide a forum for policy discussions. Many ODCs are also potent GHGs and so policies aimed at reducing their emissions also reduce emissions of GHGs. The SCAQMD supports state, federal, and international policies to reduce levels of ozone depleting gases through its Global Warming Policy and rules. Further, SCAQMD has developed ODC Replacement Guidelines to facilitate transition from ODCs to substances that are the most environmentally benign (SCAQMD 2005).

The US EPA has issued regulatory actions under the Clean Air Act and in some cases other statutory authorities to address issues related to climate change¹. Most recently, on December 7, 2009, Administrator Lisa Jackson signed a final action, under Section 202(a) of the Clean Air Act, finding that six key well-mixed greenhouse gases constitute a threat to public health and welfare, and that the combined emissions from motor vehicles cause and contribute to the climate change problem.

The US EPA, under the Energy Independence and Security Act of 2007, is responsible for revising and implementing regulations to ensure that gasoline sold in the United States contains a minimum volume of renewable fuel. A Notice of Proposed Rulemaking for the Renewable Fuel Standard (RFS) program was published on May 26, 2009. The RFS program will increase the volume of renewable fuel required to be blended into gasoline from 9 billion gallons in 2008 to 36 billion gallons by 2022. The new RFS program regulations are being developed in collaboration with refiners, renewable fuel producers, and many other stakeholders.

On September 15, 2009, US EPA and the Department of Transportation's National Highway Traffic Safety Administration (NHTSA) proposed a new national program that would reduce GHG and improve fuel economy for all new cars and trucks sold in the United States. US EPA proposed the first-ever national GHG emissions standards under the Clean Air Act, and NHTSA proposed Corporate Average Fuel Economy (CAFE) standards under the Energy Policy and Conservation Act. This proposed national program would allow automobile manufacturers to build a single light-duty national fleet that satisfies all requirements under both Federal programs and the standards of California and other states.

In response to the FY2008 Consolidated Appropriations Act (H.R. 2764; Public Law 110–161), US EPA issued the Final Mandatory Reporting of Greenhouse Gases Rule. Signed by the Administrator on September 22, 2009, the rule requires in general that suppliers of fossil fuels and industrial GHGs, manufacturers of vehicles and engines outside of the light duty sector, and facilities that emit 25,000 MT or more of GHGs per year to submit annual reports to US EPA. The rule is intended to collect accurate and timely emissions data to guide future policy decisions on climate change.

¹ <http://www.epa.gov/climatechange/initiatives/index.html>, accessed January 25, 2010.

On September 30, 2009 US EPA proposed new thresholds for GHG that define when Clean Air Act permits under the New Source Review and Title V operating permits programs would be required. The proposed thresholds would tailor these permit programs to limit which facilities would be required to obtain permits and would cover nearly 70 percent of the nation's largest stationary source GHG emitters—including power plants, refineries, and cement production facilities, while shielding small businesses and farms from permitting requirements.

California Code of Regulations Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings were first established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The latest amendments were made in October 2005 and currently require new homes to use half the energy they used only a decade ago. In September 2008, the changes were adopted to the Building Energy Efficiency Standards contained in the California Code of Regulations (CCR), Title 24, Part 6 (also known as the California Energy Code) and associated administrative regulations in Part 1. The new 2008 standards went into effect January 1, 2010. Energy efficient buildings require less electricity, and electricity production by fossil fuels results in greenhouse gas emissions. Therefore, increased energy efficiency results in decreased greenhouse gas emissions.

California Assembly Bill 1493 (Pavley), signed by Governor Gray Davis on July 22, 2002, requires CARB to develop and adopt regulations that reduce GHG emitted by passenger vehicles and light duty trucks. Regulations adopted by CARB will apply to 2009 and later model year vehicles. CARB estimates that the regulation will reduce climate change emissions from light duty passenger vehicle fleet by an estimated 18 percent in 2020 and by 27 percent in 2030. The US EPA initially denied the Clean Air Act waiver required to implement AB 1493 on December 19, 2007. However, in January 2009, President Barack Obama issued a directive to the US EPA to reconsider California's request for a waiver. The EPA granted California's request for a CAA waiver on June 30, 2009.

In order to reduce GHG in California, Governor Arnold Schwarzenegger signed Executive Order S-3-05 in June 2005. This Order calls for the following GHG emission reduction targets to be established: reduce GHG emissions to 2000 levels by 2010; reduce GHG emissions to 1990 levels by 2020; and reduce GHG emissions to 80 percent below 1990 levels by 2050. It also requires biennial reports on potential climate change effects on several areas, including water resources. The Order also requires that the Secretary of the California Environmental Protection Agency (CalEPA) shall coordinate oversight of the efforts made to meet the targets with: the Secretary of the Business, Transportation and Housing Agency, Secretary of the Department of Food and Agriculture, Secretary of the Resources Agency, Chairperson of the Air Resources Board, Chairperson of the Energy Commission, and the President of the Public Utilities Commission. The Secretary of CalEPA leads a "Climate Action Team" made up of representatives from the agencies listed above to implement global warming emission reduction programs and report on the progress made toward meeting the statewide greenhouse gas targets that were established in the executive order. Per the Executive Order, the first Climate Action Team report to the Governor and the Legislature was released in March 2006 (2006 CAT Report).

In September 2006, Governor Arnold Schwarzenegger signed Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006. AB 32 directs the CARB to implement regulations for a cap on sources or categories of sources of GHG emissions. GHG as defined under AB 32 includes: carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. The bill requires that CARB develop regulations to reduce emissions with an enforcement mechanism to ensure that the reductions are achieved, and to disclose how it arrives at the cap. It also includes conditions to ensure that businesses and consumers are not unfairly affected by reductions.

AB 32 requirements and milestones are as follows:

- June 30, 2007–Identification of discrete early action greenhouse gas emissions reduction measures. Three early action measures were approved by CARB on June 21, 2007. Six other discrete early action measures were subsequently approved.
- January 1, 2008–Establish a 1990 baseline GHG emissions level and approval of a statewide limit equivalent to that level. Adoption of mandatory reporting and verification requirements concerning GHG emissions. On December 6, 2007, CARB approved a statewide limit on GHG emissions levels for the year 2020 consistent with the determined 1990 baseline.
- January 1, 2009–Adoption of a scoping plan for achieving GHG emission reductions. On December 11, 2008, the CARB Board adopted the Climate Change Scoping Plan (Scoping Plan) at its meeting.
- January 1, 2010–Adoption and enforcement of regulations to implement the “discrete” actions.
- January 1, 2011–Adoption of GHG emissions limits and reduction measures by regulation.
- January 1, 2012–GHG emissions limits and reduction measures adopted in 2011 become enforceable.

AB 32 codifies the state’s goal by requiring that statewide GHG emissions be reduced to 1990 levels by the year 2020.

Under AB 32, CARB published its Expanded List of Early Action Measures to Reduce Greenhouse Gas Emissions in California in October 2007. There are 44 early action measures, both regulatory and non-regulatory, and are currently underway or to be initiated by the CARB in the 2007 to 2012 timeframe. The early action measures apply to the fuels, transportation, forestry, agriculture, education, energy efficiency, commercial, waste, fuels, cement, oil and gas, electricity, and fire suppression sectors. As noted in the milestones above, nine of the early action measures are discrete early action measures that are regulatory and enforceable by January 1, 2010. CARB estimates that the 44 recommendations have the potential to result in GHG reductions of at least 42 MMTCO₂e by 2020, representing approximately 25 percent of the 2020 target.

As discussed in the Scoping Plan, the projected total business-as-usual emissions for year 2020 (596 MMTCO₂e) must be reduced approximately 30 percent to achieve CARB’s approved 2020 emission target of 427 MMTCO₂e. This is approximately 15 percent reduction in today’s levels.

The Scoping Plan identifies recommended measures for several GHG emission sectors and the associated emission reductions to meet the 2020 emissions target. Each sector has a different emission reduction target. The majority of the measures target the transportation and electricity sectors. As stated in the Scoping Plan, the key elements for reducing California's GHG to 1990 levels by 2020 include:

- Expanding and strengthening existing energy efficiency programs as well as building and appliance standards;
- Achieving a statewide renewables energy mix of 33 percent;
- Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system;
- Establishing targets for transportation-related emissions for regions throughout California and pursuing policies and incentives to achieve those targets;
- Adopting and implementing measures pursuant to existing State laws and policies, including California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard; and
- Creating targeted fees, including a public goods charge on water use, fees on high global warming potential gases, and a fee to fund the administrative costs of the State's long-term commitment to AB 32 implementation.

Also in September 2006, Governor Arnold Schwarzenegger signed Senate Bill (SB) 1368 which calls for the adoption of a greenhouse gas (GHG) performance standard for in-state and imported electricity generators to mitigate climate change. On January 25, 2007, the California Public Utilities Commission adopted an interim GHG emissions performance standard. This standard is a facility-based emissions standard requiring all new long-term commitments for baseload generation to serve California consumers to be with power plants that have emissions no greater than a combined cycle gas turbine plant. The established level is 1,100 pounds of CO₂ per megawatt-hour.

Executive Order S-01-07 was approved by the Governor on January 18, 2007. The order mandates that a statewide goal shall be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020. It also requires that a Low Carbon Fuel Standard for transportation fuels be established for California.

The Western Regional Climate Action Initiative was signed on February 26, 2007 by five states: Washington, Oregon, Arizona, New Mexico, and California. Utah, as well as Manitoba and British Columbia, Canada joined in April 2007. Montana joined in January 2008 and Quebec moved from Observer to Partner status in April 2008. Other United States and Mexican states and Canadian provinces have joined as observers. The Initiative plans on collaborating to identify, evaluate, and implement ways to reduce GHG emissions in the states collectively and to achieve related co-benefits. The Initiative announced recommendations for the design of a regional market-based cap and trade program in September 2008 and released their document "Background Document and Progress Report for Essential Requirements of Mandatory

Reporting for the Western Climate Initiative, Third Draft” on January 6, 2009. In addition, a multi-state registry will track, manage, and credit entities that reduce GHG emissions.

In August 2007, Governor Arnold Schwarzenegger signed Senate Bill (SB) 97, CEQA: Greenhouse Gas Emissions. The bill would require the OPR, by July 1, 2009, to prepare guidelines for the feasible mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions, as required by CEQA, including, but not limited to, effects associated with transportation or energy consumption. The Resources Agency would be required to certify and adopt those guidelines by January 1, 2010. On June 19, 2008, OPR released an interim technical advisory for addressing climate change in CEQA documents (OPR 2008). The recommended approach is to identify and quantify project-related GHG emissions; determine its significance; and if the impact is found to be potentially significant, implement mitigation measures or alternatives that will reduce the impact below significance. Further, the guidance states that the lead agency is not responsible for completely eliminating all project-related GHG emissions.

Pursuant to SB 97, OPR released and the Natural Resources Agency adopted CEQA Guideline Amendments (Adopted Amendments) addressing GHG emissions on December 30, 2009. The Natural Resources Agency also released “Final Statement of Reasons for Regulatory Action: Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB 97” (FSOR) providing additional explanation about the Adopted Amendments². The Adopted Amendments will not become effective until after the Office of Administrative Law completes its review of the Adopted Amendments and rulemaking file, and transmits the Adopted Amendments to the Secretary of State for inclusion in the California Code of Regulations.

Among other things, these Adopted Amendments require that public agencies consider GHG in any CEQA documents. The Adopted Amendments establish a new section within Appendix G, GREENHOUSE GAS EMISSIONS, with two issue questions to determine if the project would: a) generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or b) conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases? However, because these Adopted Amendments were not established at the time the NOP for this project was circulated, they will not be included as separate thresholds herein. However, this section’s GHG analysis discusses the subject matter of the additional Environmental Checklist Form questions included in Appendix G.

The Adopted Amendments emphasize that lead agencies have the discretion to determine appropriate significance thresholds for evaluating GHG impacts that are supported by substantial evidence in the record. According to Section 15064.4(a) of the Adopted Amendments, “The determination of the significance of greenhouse gas emissions calls for a careful judgment by the lead agency consistent with the provisions in section 15064 [Determining the Significance of the Environmental Effects Caused by a Project]. A lead agency should make a good-faith effort,

² Adopted Amendments and FSOR available at <http://ceres.ca.gov/ceqa/guidelines/>

based on the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project.”

In addition, Section 15064.7(c) of the Adopted Amendments specifies that “[w]hen adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence.” The Resources Agency FSOR emphasizes that the Adopted Amendments encourage lead agencies to rely on thresholds developed by other agencies with specialized expertise, and note that air districts, in particular, may provide guidance on adopting thresholds of significance (Natural Resources Agency FSOR page 25). Thus, the Adopted Amendments do not prescribe specific significance thresholds for use by lead agencies. Rather, they emphasize the lead agency's discretion in developing significance thresholds, and encourage lead agencies to consider thresholds by other agencies as well.

The Adopted Amendments support the use of AB 32 as a performance-based significance threshold against which to evaluate cumulative GHG impacts from a project. According to Section 15064.4(a)(2), lead agencies may rely on performance-based standards in determining a project's impacts. In addition, Section 15064.4(b)(3) of the Adopted Amendments permits consideration by the lead agency of “the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions” when assessing the significance of impacts from greenhouse gas emissions on the environment.

The Adopted Amendments also maintain the existing CEQA Guidelines concept of consistency with an approved plan or mitigation program demonstrating a project's impacts are less than significant; however, the Adopted Amendments provide further examples of what these plans might include (CEQA Guidelines §15064(h)(3)). According to the Adopted Amendments, such a program or plan may “include[e], but [is] not limited to, water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, plans or regulations for the reduction of greenhouse gas emissions.” (*Id.*; *see also* Adopted Amendments, Appendix G, VII(b).) (“Would the project . . . [c]onflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing emissions of greenhouse gases?”).

In summary, OPR and the Natural Resources Agency has attempted to make the Adopted Amendments consistent with the existing CEQA framework for environmental analysis, including but not limited to the determination of baseline conditions, determination of significance, cumulative impacts and evaluation of mitigation measures. For these reasons, OPR did not identify a threshold of significance for greenhouse gas emissions, nor did they prescribe assessment methodologies or specific mitigation measures. The Adopted Amendments encourage lead agencies to consider many factors in performing a CEQA analysis, but preserve the discretion granted by CEQA to lead agencies in making their own determinations based on substantial evidence. The Adopted Amendments also encourage public agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses. The approach used in this Draft EIR to evaluate GHG impacts is consistent

with OPR's Adopted Amendments by addressing the checklist questions in Appendix G within the context of the Initial Study checklist questions circulated with the NOP. The City of Perris is taking a conservative approach and concluding that any general development project that is inconsistent with State or local policies adopted to reduce the amount of GHG emissions associated with new development projects (e.g., the 2006 CAT Report) and/or generates a net increase of gaseous operational criteria pollutant emissions (VOC, NO_x, and/or CO) that exceeds the daily regional thresholds of significance recommended by the SCAQMD for criteria pollutant emissions, would also contribute a considerable amount of GHG emissions to the state-wide cumulative GHG impact.

On September 30, 2008, Governor Arnold Schwarzenegger signed Senate Bill (SB) 375 (Steinberg). SB 375 focuses on housing and transportation planning decisions to reduce fossil fuel consumption and conserve farmlands and habitat. This legislation is important to achieving AB 32 goals because greenhouse gas emissions associated with land use, which includes transportation, are the single largest source of emissions in California. SB 375 provides a path for better planning by providing incentives to locate housing developments closer to where people work and go to school, allowing them to reduce vehicle miles traveled (VMT) every year.

To achieve these goals, SB 375 will:

- require the regional transportation plan for each of the state's major metropolitan areas to adopt a "sustainable community strategy" that will meet the region's target for reducing GHG emissions from cars and light trucks. These strategies would get people out of their cars by promoting smart growth principles such as: development near public transit; projects that include a mix of residential and commercial use; and projects that include affordable housing to help reduce new housing developments in outlying areas with cheaper land and reduce vehicle miles traveled (VMT);
- create incentives for implementing the sustainable community strategies by allocating federal transportation funds only to projects that are consistent with the emissions reductions; and
- provide various forms of CEQA relief by allowing projects that are shown to conform to the preferred sustainable community strategy through the local general plans (and therefore contribute to GHG reduction) to have a more streamlined environmental review process. Specifically, if a development is consistent with the sustainable community's strategy and incorporates any mitigation measures required by a prior EIR; then, the environmental review does not have to consider: a) growth-inducing impacts, or b) project-specific or cumulative impacts from cars on global climate change or the regional transportation network. In addition, a narrowly-defined group of "transit priority projects" will be exempt from CEQA review.

On October 24, 2008, CARB released the *Preliminary Draft Staff Proposal: Recommended Approaches for Setting Interim Significant Thresholds for Greenhouse Gases under CEQA* recommending GHG-related significance thresholds which lead agencies can use in the significance determination pursuant to OPR's request (CARB 2008). The current recommendations are a sector-specific approach to develop threshold for project that result in a substantial portion of the state's GHG emissions. The preliminary interim thresholds are for two

sectors: 1) industrial projects, and 2) residential and commercial projects. For industrial projects that do not qualify under existing CEQA statutory or categorical exemptions, CARB recommends that GHG-related impacts may be found to be insignificant if they: (1) meet interim performance standards for construction and transportation-related emissions; and (2) emit no more than 7,000 MTCO₂E from non-transportation operational sources. CARB recommends that residential and commercial projects that do not qualify under existing CEQA statutory or categorical exemptions are presumed to have a less than significant impact related to climate change if: (1) construction activities meet an interim CARB performance standard for construction-related emissions; (2) operational activities: i) meet the California Energy Commission's Tier II Energy Efficiency goal; ii) meet an interim CARB performance standard for water use; iii) meet an interim CARB performance standard for waste; and iv) meet an interim CARB performance standard for transportation; and (3) the project will emit no more than a "to be determined" limit for metric tons CO₂e per year. Although the CARB 2008 Draft Guidance indicated CARB's intent to provide final guidance to OPR before OPR issued its draft CEQA guidelines, CARB did not release final guidance before OPR's April 2009 release of its Proposed CEQA Guidelines or the July 2009 Natural Resources Agency Notice. Because no further guidance has been issued as of January 2010, these recommendations are not utilized in the project's analysis; they are briefly addressed here for the purpose of full disclosure. Instead, the City of Perris is taking a conservative approach as described above.

Regionally, the SCAQMD is responsible for monitoring air quality; and planning, implementing, and enforcing programs designed to attain and maintain state and federal ambient air quality standards in the district. Programs developed include air quality rules and regulations that regulate stationary source emissions, including area and point sources and certain mobile source emissions. The SCAQMD is also responsible for establishing permitting requirements and issuing permits for stationary sources and ensuring that new, modified, or relocated stationary sources do not create net emissions increases. The SCAQMD enforces air quality rules and regulations through a variety of means, including inspections, educational and training programs, and fines. A number of GHG are currently regulated through implementation of rules adopted by the SCAQMD, as discussed below.

Methane emissions from landfills are reduced by SCAQMD Rule 1150.1 – Control of Gaseous Emissions from Active Landfills. Methane emissions from petroleum sources are reduced by a number of rules in SCAQMD Regulation XI that control fugitive emissions from petroleum production, refining, and distribution.

SCAQMD Rule 1418 – Halon Emissions From Fire Extinguishing Equipment requires the recovery and recycling of halons used in fire extinguishing systems and prohibits the sale of halon in small fire extinguishers.

SCAQMD Rule 1415 – Reduction of Refrigerant Emissions from Stationary Refrigeration and Air Conditioning Systems requires CFC refrigerants to be reclaimed or recycled from stationary refrigeration and air conditioning systems. SCAQMD Rule 1405 – Control of Ethylene Oxide and Chlorofluorocarbon Emissions From Sterilization or Fumigant Processes requires recovery of reclamation of CFCs at certain commercial facilities and eliminates the use of some CFCs in the sterilization processes. Some CFCs are classified as TACs and regulated by SCAQMD Rule

1401 – New Source Review of Toxic Air Contaminants and SCAQMD Rule 1402 Control of Toxic Air Contaminants from Existing Sources.

SCAQMD regulates TCA compound as a toxic air contaminant under Rules 1401 and 1402.

In addition to current rules and regulations which also address GHG, SCAQMD plans to provide guidance to local lead agencies on determining significance for GHG in their CEQA documents by convening a *GHG CEQA Significance Threshold Working Group* to work with SCAQMD staff on developing GHG CEQA significance thresholds. The SCAQMD began hosting monthly working group meetings in April 2008. The result of the working group meeting on October 22, 2008 was a *Draft AQMD Staff CEQA Greenhouse Gas Significance Threshold* (SCAQMD 2008a) and the *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold* (SCAQMD 2008b). The Draft Threshold is intended to be interim guidance until statewide significance thresholds or guidance is established. The proposed significance threshold is a tiered approach which allows for flexibility by establishing multiple thresholds to cover a broad range of projects.

The SCAQMD proposal in October 2008 included three tiers of compliance that may lead to a determination that impacts are less than significant, including: (1) projects with greenhouse gas emissions within budgets set out in approved regional plans, to be developed under the SB 375 process; (2) projects with greenhouse gas emissions that are below designated quantitative thresholds: (i) industrial projects with an incremental greenhouse gas emissions increase that falls below (or is mitigated to be less than) 10,000 MTCO_{2e} /yr; or (ii) commercial and residential projects with an incremental greenhouse gas emissions increase that falls below (or is mitigated to be less than) 3,000 MTCO_{2e} /yr, provided that such projects also meet energy efficiency and water conservation performance targets that have yet to be developed; (3) projects that purchase greenhouse gas offsets which, either alone or in combination with one of the three tiers mentioned above, achieve the target significance screening level.

On December 5, 2008, the SCAQMD Governing Board adopted its staff proposal for an interim CEQA GHG significance threshold for projects where the SCAQMD is the lead agency. Currently, the Board has only adopted thresholds relevant to industrial (stationary source) projects. To achieve a policy objective of capturing 90% of GHG emissions from new residential/commercial development projects and implement a “fair share” approach to reducing emission increases from each sector, SCAQMD staff has proposed combining performance standards and screening thresholds. The performance standards suggested have primarily focused on energy efficiency measures beyond Title 24 Part 6, California’s building energy efficiency standards, and a screening level of 3,000 tonnes CO_{2e} per year based on direct operational emissions. Above this screening level, project design features designed to reduce GHGs must be implemented to reduce the impact to below a level of significance. SCAQMD staff are performing additional analyses to further define the performance standards as well as coordinating with CARB’s interim GHG proposal. At this time SCAQMD is waiting for CARB’s recommendations for the residential/commercial sector. Once CARB adopts the

statewide significance thresholds, staff will report back to the Board regarding any recommended changes or additions to the SCAQMD's interim threshold.³

Since December of 2008, the SCAQMD continued hosting the working group meetings and revised the draft threshold proposal several times although it did not officially provide these proposals in a subsequent document. The working group meeting on November 19, 2009⁴ proposed two options lead agencies can select from for screening thresholds of significance for GHG emissions in residential and commercial projects. Option 1 is by land use where the numeric threshold is 3,500 tons per year of CO₂e of (tpy) for residential projects; 1,400 tpy for commercial projects; and 3,000 tpy for mixed use projects. Option 2 is a combined approach for all three land use types and is set at 3,000 tpy. Because this guidance continues to evolve, these recommendations are not utilized in the project's analysis; they are briefly addressed here for the purpose of full disclosure.

Instead, the City of Perris is taking a conservative approach, as described above, and concluding that any general development project that is inconsistent with State or local policies adopted to reduce the amount of GHG emissions associated with new development projects (e.g., the 2006 CAT Report) and/or generates a net increase of gaseous operational emissions (VOC, NO_x, and/or CO) that exceeds the daily regional thresholds of significance recommended by the SCAQMD for criteria pollutant emissions, would also contribute a considerable amount of GHG emissions to the state-wide cumulative GHG impact.

City of Perris General Plan

The Conservation Element of the Perris General Plan contains the following goals, policies and implementation measures related to creating a sustainable community and by extension to air quality:

- Goal VIII** Create a vision for energy and resource conservation and the use of green building design for the City, to protect the environment, improve quality of life, and promote sustainable practices.
- Policy VIII.A** Adopt and maintain development regulations that encourage water and resource conservation.
- Measure VIII.A.1** Use indigenous and/or drought-resistant planting materials and efficient irrigation systems in residential projects as a means of reducing water demand, including smart irrigation systems.
- Measure VIII.A.2** Use indigenous and/or drought-resistant planting and efficient irrigation systems with smart controls in all new refurbished commercial and industrial development projects. Also, restrict use of turf to 25% or less of the landscaped areas.
- Measure VIII.A.3** Use water conserving appliances and fixtures (low-flush toilets, and low-flow shower heads and faucets) within all new residential developments.

³ <http://www.aqmd.gov/hb/2008/December/081231a.htm>

⁴ <http://www.aqmd.gov/ceqa/handbook/GHG/nov19mtg/nov19.html>

- Measure VIII.A.4** Use gray water, and water conserving appliances and fixtures within all new commercial and industrial developments.
- Measure VIII.A.5** Use permeable paving materials within developments to deter water runoff and promote natural filtering of precipitation and irrigation waters.
- Measure VIII.A.7** Create and maintain reclaimed water systems to provide reclaimed water for irrigation of municipal and commercial landscaping.
- Measure VIII.A.8** Explore the use of private water well systems for all potable and/or landscaping water use for larger commercial and industrial projects.
- Policy VIII.B** Adopt and maintain development regulations that encourage recycling and reduced waste generation by construction projects.
- Measure VIII.B.1** Initiate and maintain incentive programs to encourage and reward developments that employ energy and resource conservation and green building practices similar to the City’s current recycling program.
- Measure VIII.B.2** Require the installation of recycling bins and provide space for storage and collection of recyclables within development sites.
- Measure VIII.B.3** Require the installation of recycling bins and provide space for storage and collection of recyclables within development sites.
- Goal IX** Encourage project designs that support the use of alternative transportation facilities.
- Policy IX.A** Encourage land uses and new development that support alternatives to the single occupant vehicle.
- Measure IX.A.1** Encourage installation of shared vehicle parking and support facilities within new and refurbished commercial and industrial developments, i.e., dual fuel vehicles and charging systems on-site, car pool parking, and bus stop shelters.
- Measure IX.A.2** Install bicycle paths and create secure and accessible bicycle storage for visitors and occupants within new and refurbished commercial and industrial developments.
- Measure IX.A.4** Encourage building and site designs that facilitate pedestrian activity, such as locating buildings close to the street and providing direct connections to public walkways and neighboring land uses.
- Measure IX.A.5** The City shall require all new public and private development to include bike and walking paths wherever feasible.
- Goal X** Encourage improved energy performance standards above and beyond the California Title 24 requirements.
- Policy X.A** Establish density bonuses, expedited permitting, and possible tax deduction incentives to be made available for developers who exceed current Title 24 requirements for new development.
-

- Measure X.A.2** Encourage energy conservation devices including but not limited to lighting, water heater treatments, solar energy systems, etc. for all residential projects.
- Policy X.B** Encourage the use of trees within project design to lessen energy needs, reduce the urban heat island effect, and improve air quality throughout the region.
- Measure X.B.1** Explore the benefits of an urban forestry program such as Tree City USA, to capitalize on the environmental, social, aesthetic, and economic benefits of trees in the urban environment.
- Measure X.B.3** Provide educational materials to residents about the value of trees in the environment and encourage the planting of trees and tree care.
- Policy X.C** Encourage strategic shape and placement of new structures within new commercial and industrial projects.
- Measure X.C.1** Promote energy conservation by taking advantage of natural site features such as natural lighting and ventilation, sunlight, shade and topography during the site plan process.
- Measure X.C.2** When possible, locate driveways and parking on the east and north sides of buildings to reduce heat buildup during hot afternoons.

Design Considerations

In addition to compliance with Title 24, this proposed project will incorporate design measures from the *Leadership in Energy and Environmental Design (LEED) for New Construction Green Building Rating System* which is a performance-oriented rating system where building projects earn points for satisfying criterion designed to address specific environmental impacts inherent in the design, construction, operations, and management of a building. The LEED rating system is organized into five environmental categories: Sustainable Sites, Water Efficiency, Energy and Atmosphere, Materials and Resources, and Indoor Environmental Quality. An additional category, Innovation and Design, awards points to LEED projects that develop new solutions, employ new technologies, educate, or realize exemplary performance in another area. There are four levels of the LEED rating system: certified, silver, gold, and platinum.

Based on preliminary project data as indicated in **Table 4.3-B** below, the proposed project would incorporate various project design features and operational processes that would result in a LEED score of 33 out of a possible 69. The project's goal is not to be certified through LEED, but to incorporate design features from the LEED rating system which would reduce the project's overall environmental impacts including those related to GHG production.

Table 4.3-B
LEED for New Construction v2.2 Registered Project Checklist

LEED Category	Credit Description	Yes	Maybe	No
Sustainable Sites				
Prerequisite 1	Construction Activity Pollution Prevention	Req.		
Credit 1	Site Selection	1		
Credit 2	Development Density and Community Connectivity		1	
Credit 3	Brownfield Redevelopment			
Credit 4.1	Alternative transportation, Public Transportation Access		1	
Credit 4.2	Alternative Transportation, Bicycle Storage	1		
Credit 4.3	Alternative Transportation, Low-Emission and Fuel Efficient Vehicles	1		
Credit 4.4	Alternative Transportation, Parking Capacity	1		
Credit 5.1	Site Development, Protect or Restore Habitat		1	
Credit 5.2	Site Development, Maximize Open Space		1	
Credit 6.1	Stormwater Design, Quality Control	1		
Credit 6.2	Stormwater Management, Quality Control		1	
Credit 7.1	Heat-Island Effect, Non-Roof		1	
Credit 7.2	Heat-Island Effect, Roof		1	
Credit 8	Light Pollution Reduction	1		
	Sustainable Sites Totals	6	7	
Water Efficiency				
Credit 1.1	Water Efficient Landscaping, Reduce by 50%	1		
Credit 1.2	Water Efficient Landscaping, No Potable Use or No Irrigation		1	
Credit 2	Innovative Water Technologies			1
Credit 3.1	Water Use Reduction, 20% Reduction	1		
Credit 3.2	Water-Use Reduction, 30% Reduction	1		
	Water Efficiency Totals	3	1	1
Energy and Atmosphere				
Prerequisite 1	Fundamental Commissioning of the Building Energy Systems	Req.		
Prerequisite 2	Minimum Energy Performance	Req.		
Prerequisite 3	Fundamental Refrigerant Management	Req.		
Credit 1	Optimize energy performance: 14 % New Buildings or 7 % Existing Building Renovations	2		
Credit 2	On-Site Renewable Energy		3	
Credit 3	Enhanced Commissioning	1		
Credit 4	Enhanced Refrigerant Management	1		
Credit 5	Measurement and Verification		1	
Credit 6	Green Power		1	
	Energy and Atmosphere Totals	4	4	
Materials and Resources				
Prerequisite 1	Storage and Collection of Recyclables	Req.		
Credit 1.1	Building Reuse, Maintain 75% of Existing Walls, Floors, and Roof			1
Credit 1.2	Building Reuse, Maintain 95% of Existing Walls, Floors, and Roof			1

LEED Category	Credit Description	Yes	Maybe	No
Credit 1.3	Building Reuse, Maintain 50% of Existing Walls, Floors, and Roof			1
Credit 2.1	Construction Waste management, Divert 50% from disposal	1		
Credit 2.2	Construction Waste management, Divert 75% from disposal	1		
Credit 3.1	Materials Reuse, 5%	1		
Credit 3.2	Materials Reuse, 10%		1	
Credit 4.1	Recycled Content, 10% (Post-Consumer + ½ pre-consumer)	1		
Credit 4.2	Recycled Content, 20% (Post-Consumer + ½ pre-consumer)		1	
Credit 5.1	Regional Materials, 10% Extracted, Processed and Manufactured Regionally	1		
Credit 5.2	Regional Materials, 20% Extracted, Processed and Manufactured Regionally		1	
Credit 6	Rapidly Renewable Materials		1	1
Credit 7	Certified Wood		1	1
	Materials and Resources Totals	5	5	3
Indoor Environmental Quality				
Prerequisite 1	Minimum IAQ Performance	Req.		
Prerequisite 2	Environmental Tobacco Smoke (ETS) Control	Req.		
Credit 1	Outdoor Air Delivery Monitoring		1	
Credit 2	Increased Ventilation		1	
Credit 3.1	Construction IAQ Management Plan – during construction	1		
Credit 3.2	Construction IAQ Management Plan – before occupancy	1		
Credit 4.1	Low-emitting materials, adhesives and sealants	1		
Credit 4.2	Low-emitting materials, paints and coatings	1		
Credit 4.3	Low-emitting materials, carpet systems	1		
Credit 4.4	Low-emitting materials, Composite Wood and Agrifiber Products	1		
Credit 5	Indoor Chemical and Pollutant Source Control	1		
Credit 6.1	Controllability of Systems, Lighting	1		
Credit 6.2	Controllability of Systems, Thermal Comfort	1		
Credit 7.1	Thermal Comfort, Design	1		
Credit 7.2	Thermal Comfort, Verification		1	
Credit 8.1	Daylight & Views, Daylight 75% of Spaces	1		
Credit 8.2	Daylight & Views, Daylight 90% of Spaces	1		
	Indoor Environmental Quality Totals	12	3	0
Innovation and Design Process				
Credit 1.1	Innovation in Design: WE c 3 40%	1		
Credit 1.2	Innovation in Design: SS c 7.1 100%	1		
Credit 1.3	Innovation in Design: EA c 6 double contract		1	
Credit 1.4	Innovation in Design: tenant LEED guideline		1	
Credit 2	LEED Accredited Professional	1		
	Innovation and Design Process Totals	3	2	1

TOTAL CREDITS		Yes	Maybe	No
	LEED Levels: Certified = 26-32, Silver = 33-38, Gold = 39-51, Platinum = 52-69	33	23	4

Note: Req. = required of all development and does not count towards total credits

The credits listed above in **Table 4.3-B** incorporate various design features which will increase the project's overall performance in each of the five categories from project design and construction through operations and maintenance. The specific features (credits) that will be implemented from **Table 4.3-B** are preliminary at this time and will not be completed until after the project is approved.

Thresholds of Significance

The City of Perris has not adopted its own thresholds of significance and, instead, defers to the thresholds of significance identified as described in Appendix G of the CEQA Guidelines. Based on Appendix G of the CEQA Guidelines, impacts related to air quality may be considered potentially significant if the project would:

- Conflict with or obstruct implementation of the applicable air quality plan. Specifically, the Air Quality Management Plan for the South Coast Air Basin.
- Violate any ambient air quality standard or contribute substantially to an existing or projected air quality violation.
- 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.
- Expose sensitive receptors to substantial pollutant concentrations.
- Expose a substantial number of people to objectionable odors.

The threshold involving the exposure of sensitive receptors to substantial pollutant concentrations will be expanded on and analyzed based on the SCAQMD's threshold for Toxic Air Contaminants (TACs) as shown below.

- Expose sensitive receptors to substantial pollutant concentrations.
 - Expose sensitive receptors to any Toxic Air Contaminant (TAC), at a level that exceeds 10 excess cancer cases per one million people (per SCAQMD);
 - Expose sensitive receptors to a hazard index of 1.0 or greater using a chronic reference exposure level for chronic non-cancer risks associated with TACs(per SCAQMD)

In regard to Thresholds of Significance related to GHG, at the time the Initial Study/NOP was released in November 2008, neither the SCAQMD nor any other air district in California had promulgated a quantitative or qualitative significance threshold for GHG. Similarly, neither the California EPA nor the U.S. EPA has developed, to date, guidelines on how to prepare an impact assessment for a community's or project's GHG contribution to global climate change. However, both the SCAQMD and the CARB released draft approaches for setting interim GHG significance thresholds in CEQA documents in late October 2008. Subsequently, the SCAQMD

adopted, on December 5, 2008, a GHG significance threshold for industrial projects where the SCAQMD is the lead agency. Additionally, OPR released and the Natural Resources Agency approved amendments to the CEQA Guidelines addressing GHG emissions on December 30, 2009. These actions are all described above in the Related Regulations section. Another limitation to establishing a local threshold, based on a quantitative analysis, is that emissions models such as EMFAC and URBEMIS evaluate aggregate emissions and do not demonstrate, with respect to global impact, how much of these emissions are “new” emissions specifically attributable to the proposed project in question. In the absence of any other adopted thresholds, the City of Perris is taking a conservative approach and concluding that any general development project that is inconsistent with State or local policies adopted to reduce the amount of GHG emissions associated with new development projects (e.g., the 2006 CAT Report) and/or generates a net increase of gaseous operational emissions (VOC, NO_x, and/or CO) that exceeds the daily regional thresholds of significance recommended by the SCAQMD for criteria pollutant emissions, would also contribute a considerable amount of GHG emissions to the state-wide cumulative GHG impact.

Environmental Impacts Before Mitigation

Threshold: *Conflict with or obstruct implementation of the applicable air quality plan.*

The AQMP for the SCAB sets forth a comprehensive program that will lead the SCAB into compliance with all federal and state air quality standards. The AQMP control measures and related emission reduction estimates are based upon emissions projections for a future development scenario derived from land use, population, and employment characteristics defined in consultation with local governments. Accordingly, conformance with the AQMP for development projects is determined by demonstrating compliance with local land use plans and/or population projections and meeting the land use designation set forth in the local General Plan. This analysis utilizes the compliance with local land use plans as the basis for its significance determination.

According to the City of Perris General Plan, the property is located in Planning Area 3: Agricultural Conversion Area. The area currently consists of agricultural-zoned land that represents 42% of the City’s agricultural zoning, although there is no agricultural land use designation in the General Plan. The largest land use within Planning Area 3 is Light Industrial. The General Plan plans to expand the light industrial and commercial land uses due to the close proximity to Interstate 215, a cargo airport, rail lines, and other commercial and industrial land uses. Conversion of agricultural land to light industrial and commercial uses is compatible with surrounding land uses and consistent with the General Plan with the intension of promoting economic growth within an undeveloped area in the City of Perris.

The General Plan land use designation for the project property is “Light Industrial” and “Public/Semi-Public Facilities/Utilities.” These designations allow limited assembly and packaging operations, self-storage warehouses, distribution centers, and business-to-business retail operations. The minimum lot size for this land use is 10,000 square feet. The project is proposing a 1,191,080 square foot distribution center, which falls within the requirements of the

General Plan land use designation for “Light Industrial” and overflow parking which is consistent with the “Public/Semi-Public Facilities/Utilities” designation.

The proposed project is considered to be consistent with the Land Use Plan set forth in the General Plan. Therefore, since the AQMP utilized an Industrial land use designation for most of the project site and Public/Semi-Public Facilities/Utilities for the northern 155 feet of the project site, and the project is industrial with overflow parking on the northern 155 feet of the project site, the project can be determined to be consistent with the AQMP. Therefore the project will not conflict with or obstruct implementation of the applicable AQMP, and **potential impacts will be less than significant with no mitigation required.**

Threshold: Violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Air quality impacts can be divided into short-term and long-term impacts. Short-term impacts are usually related to construction and grading activities. Long-term impacts are usually associated with build-out conditions and long-term operations of a project. Both short-term and long-term air quality impacts can be analyzed on a regional and localized level. Regional air quality thresholds examine the effect of project emissions on the air quality of the Basin, while localized air quality impacts examine the effect of project emissions on the neighborhood around the project site. The following information was derived from the Air Quality Impact Analysis (AQIA) which is found in Appendix C.

SCAQMD’s Regional Significance Threshold (RST) Analysis

The thresholds shown in **Table 4.3-C** below are from the SCAQMD’s CEQA Handbook and are the standard regional thresholds for determining significance under CEQA sanctioned by the SCAQMD. These regional significance thresholds were developed by SCAQMD based on the estimated daily emissions of a major stationary source.

Table 4.3-C, SCAQMD CEQA Regional Significance Thresholds

Emission Threshold	Units	VOC	NO_x	CO	SO_x	PM-10	PM-2.5
Construction	lbs/day	75	100	550	150	150	55
Operations	lbs/day	55	55	550	150	150	55

Short-Term Impacts – RST Analysis

Short-term emissions consist of fugitive dust and other particulate matter, as well as exhaust emissions generated by construction-related vehicles. Short-term impacts will also include emissions generated during construction as a result of operation of personal vehicles by construction workers, asphalt degassing and architectural coating (painting) operations.

The project will be required to comply with existing SCAQMD rules for the reduction of fugitive dust emissions. SCAQMD Rule 403 establishes these procedures. Compliance with this rule is achieved through application of standard best management practices in construction and operation activities, such as application of water or chemical stabilizers to disturbed soils, managing haul road dust by application of water, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 mph, sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph and establishing a permanent, stabilizing ground cover on finished sites. In addition, projects that disturb 50 acres or more of soil or move 5,000 cubic yards of materials per day are required to submit a Fugitive Dust Control Plan or a Large Operation Notification Form to SCAQMD. Based on the size of the project (61.63 acres), a Fugitive Dust Control Plan or Large Operation Notification would be required.

SCAQMD Rule 1113 governs the sale of architectural coatings and limits the volatile organic content (VOC) in paints and paint solvents. Although this rule does not directly apply to the project, it does dictate the VOC content of paints available for use during building construction.

Short-term emissions were evaluated using the URBEMIS 2007 for Windows version 9.2.4 computer program. The model evaluated emissions resulting from site grading and project construction. The total construction period is expected to require nine months, beginning no earlier than 2010. The default parameters within URBEMIS were used and these default values reflect a worst-case scenario, which means that the actual project emissions are expected to be equal to or less than the estimated construction emissions. In addition to the default values used, several assumptions relevant to model input for short-term construction emission estimates are:

- The site is currently vacant, so no demolition will be necessary.
- The project will begin construction no earlier than January 2010 and take approximately 9 months to complete.
- The first phase of construction will consist of grading. It is estimated that a maximum of 15.4 acres could be graded in one day. Earthwork numbers include 171,000 cubic yards of onsite cut and fill.
- To evaluate project compliance with SCAQMD Rule 403 for fugitive dust control, the project utilized the mitigation options of watering the project site three times daily which achieves a control efficiency of 61 percent for PM-10 and PM-2.5 emissions, stabilizing soil during equipment loading/unloading which achieves a control efficiency of 69 percent for PM-10 and PM-2.5 emissions, and reducing vehicle speed on unpaved roads to less than 15 miles per hour which achieves a control efficiency of 44 percent for PM-10 and PM-2.5 emissions.
- After the site is graded, building construction will begin. This project consists of tilt-up concrete buildings. The concrete slabs used in these warehouse buildings are poured on-site and are placed in position once they are cured.

Table 4.3-D summarizes the estimated construction emissions.

Table 4.3-D, Estimated Daily Construction Emissions

Activity/Year	Peak Daily Emissions (lb/day)					
	VOC	NO _x	CO	SO ₂	PM-10	PM-2.5
SCAQMD Daily Construction Thresholds	75	100	550	150	150	55
Site Grading	13.36	151.49	63.92	0.14	401.85	88.76
Building Construction	16.36	142.94	197.64	0.33	7.86	6.44
Paving	6.38	28.33	14.65	0.02	2.00	1.80
Architectural Coating/Painting	1,343.38	0.94	16.36	0.02	0.15	0.08
Maximum¹	1,366.12	172.21	228.65	0.37	401.85	88.76
Exceeds Threshold?	Yes	Yes	No	No	Yes	Yes

Notes: See Appendix A for model output report.

¹ Building construction was assumed to occur after site grading is completed, the maximum construction emissions are the greater of either site grading or the remaining phases of construction.

Evaluation of the above table indicates that the criteria pollutant emissions from construction of this project are above the SCAQMD recommended daily regional thresholds for VOC, NO_x, PM-10, and PM-2.5 during construction and VOC during architectural coating/painting.

Long-Term Impacts – RST Analysis

Long-term emissions are evaluated at build-out for the completed project (2011). Operational emissions refer to on-road motor vehicle emissions from project build-out. These numbers are estimated by using the trip generation rate and vehicle fleet mix assumptions provided in the project-specific Traffic Study (Webb Associates 2008) and using them with the EMFAC2007 statewide vehicle fleet mix information to extrapolate a project-specific fleet mix (Appendix A). URBEMIS 2007 defaults for travel conditions such as commuter and non-work trip lengths for the Basin were used since project-specific information was not available. However, trip lengths relating to the heavy-duty trucks serving the project site, known as customer trip lengths, were changed from a default value of 8.9 miles per one-way trip to 42 miles per one-way trip to better estimate the regional movement of goods in the SCAB. Area source emissions include stationary combustion emissions of natural gas used for space and water heating, yard and landscape maintenance (assumed to occur throughout the year in southern California), and an average building square footage to be repainted each year.

Separate emissions were computed for both summer and winter (see **Tables 3.3-E and F**).

Table 4.3-E, Estimated Daily Project Operation Emissions (Summer)

Activity/Year	Peak Daily Emissions (lb/day)					
	VOC	NO _x	CO	SO ₂	PM-10	PM-2.5
SCAQMD Daily Thresholds	55	55	550	150	150	55
Natural Gas	0.06	0.81	0.68	0.00	0.00	0.00
Landscaping	0.12	0.02	1.55	0.00	0.01	0.01
Architectural Coatings	6.97	-	-	-	-	-
Vehicles	58.35	475.64	470.64	1.02	109.83	32.68
Total	65.50	476.47	472.87	1.02	109.84	32.69
Exceeds Threshold?	Yes	Yes	No	No	No	No

Table 4.3-F, Estimated Daily Project Operation Emissions (Winter)

Activity/Year	Peak Daily Emissions (lb/day)					
	VOC	NO _x	CO	SO ₂	PM-10	PM-2.5
SCAQMD Daily Thresholds	55	55	550	150	150	55
Natural Gas	0.06	0.81	0.68	0.00	0.00	0.00
Landscaping	0.12	0.02	1.55	0.00	0.01	0.01
Architectural Coatings	6.97	-	-	-	-	-
Vehicles	62.58	529.43	452.24	0.96	109.83	32.68
Total	69.73	530.26	454.47	0.96	109.84	32.69
Exceeds Threshold?	Yes	Yes	No	No	No	No

Emissions from the daily operations of the project will exceed the daily regional thresholds set by SCAQMD for VOC and NO_x in both summer and winter.

RST Analysis Conclusion

Based on the regional significance threshold analysis for the proposed project, the short-term construction will result in an exceedance for VOC, NO_x, PM-10, and PM-2.5 during construction. The long-term operation of the project will exceed the daily regional thresholds set by SCAQMD for VOC and NO_x in both summer and winter.

SCAQMD's Localized Significance Threshold (LST) Analysis

The pollutants analyzed under the LST are CO, NO_x, PM-10, and PM-2.5. Of these pollutants, the “attainment pollutants” (CO and NO_x) are derived using an air quality dispersion model to back-calculate the daily emissions that would cause or contribute to a violation in ambient air quality for the Source Receptor Area (SRA) within which the project is located (SRA 24). The non-attainment PM-10 and PM-2.5 pollutant measurements are derived using an air quality dispersion model to back-calculate the emissions necessary to make the existing violation in

SRA 24 worse, using the allowable change in concentration thresholds approved by the SCAQMD.

The LST analysis for the project site was performed using the U.S. EPA approved Industrial Source Complex Dispersion Model – Short Term computer model (ISCST3). For dispersion analysis, the user can choose from four source types in the ISCST3. The first type is a point source, which refers to stacks, where the pollutants are released from a single point. The second type is an area source, used to simulate the effects of fugitive emissions from sources such as storage piles and slag lumps. The third type is an open pit source, used to stimulate fugitive emissions from below-grade open pits, such as surface coal mines or stone quarries. The fourth type is a volume source, used to simulate the effects of emissions from sources such as building roof monitors and line sources, which include roads. Area and volume sources were modeled in this analysis as directed by the LST methodology. A uniform polar grid centered on the emission source, with flagpole receptor heights of 2.0 meters, was modeled with receptor distances located at 25, 50, 100, 200, and 500 meters from the project boundary, in accordance with LST methodology. Discrete receptors were also placed at distances of 20, 50, 70, 100, 200, 500, 1000, 2000, 3000, 4000, and 5000 meters from the project boundary line for modeling of NO_x emissions during both construction and operation. See Air Quality Impact Analysis (AQIA) in Appendix C for a complete discussion.

Short-Term Impacts – LST Analysis

The following paragraphs summarize the findings of each criteria pollutant using SCAQMD's LST methodology as contained in the AQIA in Appendix C.

NO_x

For the project area, the maximum 1-hour NO₂ concentration in the last 3 years was 0.09 ppm. The Ambient Air Quality Standard (AAQS) for NO₂ is a 1-hour maximum concentration of 0.18 ppm. Therefore, the difference in concentrations is 0.09 ppm (170 µg/m³). Based on SCAQMD methodology, the project would be considered to have significant air quality impacts if NO₂ concentrations at the nearest sensitive receptor exceed this amount. NO_x emissions are simulated in the air quality dispersion model and the NO₂ conversion rate is treated by an NO₂-to-NO_x ratio, which is a function of downwind distance. According to the LST methodology developed by staff at SCAQMD, at 5,000 meters downwind, 100 percent conversion of NO₂-to-NO_x is assumed. The nearest sensitive receptor (the residences located south of the project boundary) will be no closer than 397 meters (approximately 1,300 feet) away from the construction area. The corresponding NO₂-to-NO_x ratio is approximately 0.258, which yields an NO₂ of approximately 13.87 µg/m³. As previously indicated, LST methodology states that receptor distances should be located 25, 50, 100, 200, and 500 meters from the project boundary. Therefore, to be conservative, the nearest receptor distance of 25 meters was chosen for the analysis. The maximum modeled NO_x concentration occurs within 12 meters of the project boundary construction area. The NO_x concentration at this location is approximately 202 µg/m³ and the NO₂-to-NO_x ratio is approximately 0.053. Therefore, the sensitive receptor (residences located south of the project area) will be exposed to an NO₂ concentration of 10.71 µg/m³, which

is less than the threshold of $170 \mu\text{g}/\text{m}^3$. The project's emissions will not exceed the LST for NO_2 during construction.

CO

The localized threshold for CO is determined in much the same way as NO_x . CO concentrations are measured for both 1-hour and 8-hour concentrations. The maximum 1-hour concentration of CO for the past 3 years was 4 ppm. The maximum 8-hour CO concentration over the past 3 years is 2.9 ppm. The 1-hour AAQS maximum for CO is 20 ppm and the 8-hour maximum is 9 ppm. Therefore, significant air quality impacts related to CO will occur if the 1-hour concentration at the nearest sensitive receptor exceeds 16 ppm ($18,400 \mu\text{g}/\text{m}^3$). The maximum modeled 1-hour CO concentration is $113 \mu\text{g}/\text{m}^3$ which is well below the 1-hour threshold. The 8-hour threshold is 6.1 ppm ($7,015 \mu\text{g}/\text{m}^3$) and the maximum modeled 8-hour CO concentration is $107 \mu\text{g}/\text{m}^3$. Thus, the project's emission will not exceed the LST for either the 1- or 8-hour CO concentration during construction.

PM-10 and PM-2.5

For PM-10, the basin is in non-attainment; therefore, the LST for PM-10 during project construction was developed using a dispersion model to back-calculate the emissions necessary to exceed a concentration equivalent to $50 \mu\text{g}/\text{m}^3$ averaged over five hours, which results in an equivalent concentration for PM-10 LST of $10.4 \mu\text{g}/\text{m}^3$, averaged over 24-hours. Therefore, the project will have significant air quality impacts if 24-hour PM-10 concentrations at the nearest sensitive receptor exceed this amount.

The highest PM-10 concentration at the boundary nearest to sensitive receptors is $1064.11 \mu\text{g}/\text{m}^3$. The nearest sensitive receptor area is approximately 397 meters (approximately 1,300 feet) south of the project site. Therefore, based on the equation above, the PM-10 concentration at the nearest potential sensitive receptor will be $0.94 \mu\text{g}/\text{m}^3$, which is less than the threshold of $10.4 \mu\text{g}/\text{m}^3$. Therefore, emissions during project construction will not exceed the localized significance thresholds for PM-10 at the nearest potential sensitive receptor.

For PM-2.5, the basin is also in non-attainment and is subject to the same SCAQMD construction threshold of $10.4 \mu\text{g}/\text{m}^3$, averaged over 24-hours. PM-2.5 is a sub-set of PM-10 and as such can be described in terms of percentages. According to staff at SCAQMD, fugitive PM-2.5 represents approximately 21 percent of fugitive PM-10 while PM-2.5 from off-road diesel equipment represents approximately 92 percent of PM-10 (SCAQMD 2006). Using the maximum on-site emissions for construction contained in Appendix A of the AQIA, which occur in the grading period, the combined PM-2.5 fraction of PM-10 is approximately 22.8 percent. Therefore, it can be assumed that the concentration of PM-2.5 at the nearest potential sensitive receptor is approximately 22.8 percent of the above calculated PM-10 concentration at 37 meters of $0.94 \mu\text{g}/\text{m}^3$, resulting in a PM-2.5 concentration of $0.21 \mu\text{g}/\text{m}^3$. This concentration is also below the threshold of $10.4 \mu\text{g}/\text{m}^3$. Therefore, emissions during project construction will not exceed the LST for PM-2.5 at the nearest potential sensitive receptor.

Long-Term Impacts – LST Analysis

The following paragraphs summarize the findings of each criteria pollutant using SCAQMD's LST methodology as contained in the AQIA in Appendix C.

NO_x

For the project area, the maximum 1-hour NO₂ concentration in the last 3 years was 0.09 ppm. The Ambient Air Quality Standard (AAQS) for NO₂ is a 1-hour maximum concentration of 0.18 ppm. Therefore, the difference in concentrations is 0.09 ppm (170 µg/m³). Based on SCAQMD methodology, the project would be considered to have significant air quality impacts if NO₂ concentrations at the nearest sensitive receptor exceed 0.09 ppm. NO_x emissions are simulated in the air quality dispersion model and the NO₂ conversion rate is treated by a NO₂-to-NO_x ratio, which is a function of downwind distance. According to the LST methodology developed by staff at SCAQMD, at 5,000 meters downwind, 100 percent conversion of NO₂-to-NO_x is assumed. The nearest potential sensitive receptor is approximately 397 meters (approximately 1,300 feet) south. The NO_x concentration at this location is approximately 174.4765 µg/m³ and the NO₂-to-NO_x ratio is approximately 0.258. Therefore, the sensitive receptor will be exposed to an NO₂ concentration of approximately 45.016 µg/m³, which is less than the threshold of 170 µg/m³. The nearest commercial receptor with the highest concentration is approximately 25 meters west. The NO_x concentration at this location is approximately 1,145.02 µg/m³ and the NO₂-to-NO_x ratio is 0.053. Therefore, the commercial receptor will be exposed to an NO₂ concentration of 60.69 µg/m³, which again is less than the threshold of 170 µg/m³. Therefore, project operation will not cause an exceedance of the LST for NO₂ during project operation to either sensitive or commercial receptors.

CO

For the project area, the maximum 1-hour CO concentration in the last 3 years was 4 ppm. The maximum 8-hour CO concentration over the past 3 years is 2.9 ppm. The 1-hour AAQS maximum for CO is 20 ppm and the 8-hour maximum is 9 ppm. Therefore, significant air quality impacts related to CO will occur if the 1-hour concentration at the nearest sensitive receptor exceeds 16 ppm (18,400 µg/m³). The maximum modeled 1-hour concentration is 2,609 µg/m³ which is well below the threshold. The 8-hour threshold is 6.1 ppm (7,015 µg/m³) and the maximum modeled 8-hour CO concentration is 1,431 µg/m³. Therefore, the project's emissions will not exceed the LST for either the 1- or 8-hour CO concentration during operation.

PM-10 and PM-2.5

Although the project's operation does not contain any fugitive dust sources, operational LST analysis is required for PM-10 and PM-2.5 emissions from on-site diesel truck travel. For on-road diesel fueled vehicles, PM-2.5 represents approximately 92 percent of PM-10 emissions. For purposes of the LST analysis, PM-10, PM-2.5, and diesel particulate matter (DPM) are considered to be the same. The PM-10 concentration in the project vicinity from on-site project emissions has been analyzed in the HRA performed for the project and contained in Appendix B.

For PM-10 and PM-2.5, the basin is in non-attainment; therefore, the LST for PM-10 and PM-2.5 during project operation was developed using a dispersion model to back-calculate the emissions necessary to make an existing violation in the specific SRA worse. The HRA utilized annual emission factors and estimated the annual average DPM concentrations for the project area. For PM-10 and PM-2.5, the allowable change in annual concentration for operations is an annual average of $1.0 \mu\text{g}/\text{m}^3$. Therefore, the project will have significant air quality impacts if the annual average PM-10 and PM-2.5 concentrations at the nearest sensitive receptor exceed $1.0 \mu\text{g}/\text{m}^3$. As shown in the HRA, the maximum modeled concentration of PM-10, regardless of sensitive receptor location is $0.039 \mu\text{g}/\text{m}^3$ from project-generated emissions, which is less than the threshold of $1.0 \mu\text{g}/\text{m}^3$. Therefore, the project's emissions will not cause an exceedance of the LST for the annual PM-10 or PM-2.5 concentrations during project operation.

LST Analysis Conclusion

Based on the LST analysis of the proposed project, the short-term construction will not result in any exceedance of the LST at the nearest sensitive receptor. The long-term operation of the project will not result in any localized air quality impacts to sensitive or commercial receptors in the project vicinity. Therefore, localized air quality impacts from the short-term construction and the long-term operations will not result in any exceedances of the localized significance thresholds.

CO Hot Spot Analysis

Carbon Monoxide (CO) is a localized problem requiring additional analysis beyond total project emissions quantification. The SCAQMD recommends that projects with sensitive receptors or projects that could negatively impact levels of service (LOS) of existing roads use the screening procedures outlined in the SCAQMD CEQA Air Quality Handbook (Section 5.3) to determine the potential to create a CO "hot spot." A CO hot spot is a localized concentration of CO that is above the state or federal 1-hour or 8-hour ambient air standards. Localized high levels of CO are associated with traffic congestion and idling or slow-moving vehicles. The proposed project was evaluated to determine the potential of creating CO hot spots as a result of project operations and the project's contribution to Level of Service (LOS) on adjacent roadways according to the CO hot spots protocol developed by Caltrans. The CO hot spot analysis is contained in its entirety in Appendix B of the AQIA and the results are summarized in **Table 4.3-G, CO Hot Spot Results**.

Table 4.3-G, CO Hot Spot Results

Intersection	1-Hour CO Concentration (ppm)			8-Hour CO Concentration (ppm)		
	Existing	Project ¹	Cumulative ²	Existing	Project ¹	Cumulative ²
State Standard	20	20	20	9	9	9
Federal Standard	35	35	35	9	9	9
I-215 SB Ramps / Harley Knox Boulevard	4.6	4.6	5.8	3.4	3.4	4.2
I-215 NB Ramps / Harley Knox Boulevard	4.6	4.6	6.1	3.4	3.4	4.5
Indian Avenue / Harley Knox Boulevard	4.4	4.4	5.5	3.2	3.2	4.0
I-215 SB Ramps / Ramona Expressway	5.5	5.4	6.4	4.0	3.9	4.7
Nevada Avenue / Ramona Expressway	5.5	5.5	6.3	4.0	4.0	4.6
Webster Avenue / Ramona Expressway	5.4	5.2	6.1	3.9	3.8	4.5
Indian Avenue / Ramona Expressway	5.3	5.1	6.1	3.9	3.7	4.5
Indian Avenue / Rider Street	4.6	4.5	4.7	3.4	3.3	3.4

¹ Includes Existing and Project CO emissions.² Includes Existing and Project and Cumulative CO emissions.

For all of the intersections modeled, the CO emissions from project-generated traffic are below the California and national (federal) standards; including cumulative traffic conditions which factors in traffic generated by other area-wide development. Therefore, the project will not contribute to an exceedance of either the CAAQS or NAAQS for CO emissions and will not form any CO hot spots in the project area.

Conclusions

Based on the RST analysis for the proposed project, the short-term construction will result in an exceedance for VOC, NO_x, PM-10, and PM-2.5 during construction. The long-term operation of the project will exceed the daily regional thresholds set by SCAQMD for VOC and NO_x in both summer and winter. Therefore, short-term and long-term regional emissions are considered **significant**.

Based on the LST analysis of the proposed project, the short-term construction will not result in any exceedance of the LST at the nearest sensitive receptor and therefore localized air quality impacts from the short-term construction are considered **less than significant**. The long-term

operation of the project will not result in any localized air quality impacts to sensitive or commercial receptors in the project vicinity either. Therefore, localized air quality impacts from the long-term operations will not result in any exceedances of the localized significance thresholds. In addition, the project will not contribute to an exceedance of either the CAAQS or NAAQS for CO emissions and will not form any CO hot spots in the project area. Therefore, long-term localized impacts are considered **less than significant**.

***Threshold:** Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).*

Criteria Pollutants

The portion of the SCAB within which the project is located is designated as a non-attainment area for ozone, PM-10, and PM-2.5 under both state and federal standards.

In evaluating the cumulative effects of the project, Section 21100(e) of CEQA states that “previously approved land use documents including, but not limited to, general plans, specific plans, and local coastal plans, may be used in cumulative impact analysis.” In addressing cumulative effects for air quality, the AQMP utilizes approved general plans; therefore, it is the most appropriate document to use in evaluating cumulative impacts of the subject project. This is because the AQMP evaluated air quality emissions for the entire South Coast Air Basin using a future development scenario based on population projections and set forth a comprehensive program that would lead the region, including the project area, into compliance with all federal and state air quality standards. As described above, the project will not conflict with or obstruct the implementation of the AQMP. The project’s short-term construction emissions for VOC, NO_x, PM-10, and PM-2.5 and long-term operational emissions for VOC and NO_x have been shown to be significant on a regional level. Since the project’s short-term and long-term emissions are above thresholds for at least one pollutant, it is considered to contribute to a **cumulatively considerable net increase** in ozone and PM-10, which are non-attainment in the region under both state and federal standards; therefore, **cumulative impacts are considered significant**.

Greenhouse Gases (GHG)

Regarding GHG emissions, a project that shifts the location of where someone lives or works, by itself, may or may not contribute new GHG emissions. For example, someone may move from Northern California to western Riverside County, and while this would likely increase emissions within the Basin, it would not necessarily result in the generation of more GHG emissions globally. However, if a person moves from one location, with long commutes and a land use pattern that requires substantial energy use, to a project location that promotes shorter and fewer vehicle trips, more walking and less energy use, the new project could potentially result in a reduction in generation of global GHG emissions.

The following analysis estimates the project's GHG emissions at project build-out in 2011 primarily through the quantification of carbon dioxide emissions. As previously stated, carbon dioxide emissions accounted for approximately 84 percent of the state's total GHG emissions in 2004. Methane and nitrous oxide accounted for 5.7 and 6.8 percent, respectively. Therefore, while not an all-inclusive inventory of overall GHG emissions from the project; the estimation of CO₂ from the most important construction and operation related sources is illustrative of much of the project's contribution to GHG.

It should be noted that the release of GHG in general and CO₂ specifically into the atmosphere is not of itself an adverse environmental affect. It is the effect that increased concentrations of GHG including CO₂ in the atmosphere has upon the Earth's climate (i.e., climate change) and the associated consequences of climate change that results in adverse environmental effects (e.g., sea level rise, loss of snowpack, severe weather events). Although air quality modeling can estimate a project's incremental contribution of CO₂ into the atmosphere, it is not feasible to determine whether or how an individual project's relatively small incremental contribution (on a global scale) might translate into physical effects on the environment. Since the Earth's climate is determined by the complex interaction of different components of the Earth and its atmosphere, it is not possible to discern whether the presence or absence of GHG emitted by the project would result in any measurable impact that would cause climate change.

The following project activities were analyzed below for their contribution to global CO₂ emissions:

Short-Term Emissions:

Construction-Related Activities

The recently updated URBEMIS model calculates carbon dioxide emissions from fuel usage by construction equipment and construction-related activities, like worker trips, for the project in tons per year (one ton equals 2,000 pounds). The URBEMIS estimate does not analyze emissions from construction-related electricity or natural gas. Construction-related electricity and natural gas emissions vary based on the amount of electric power used during construction and other unknown factors which make them too speculative to quantify. Life-cycle emissions associated with the manufacture of building materials are also not quantified in this analysis although they undoubtedly exist. Quantification was not attempted because of the large spatio-temporal variation in sources for building products used to construct the project and the consequent large uncertainty associated with the resulting emissions. For this reason, to attempt to quantify life-cycle emissions of materials would be speculative. This conclusion is consistent with recent guidance on quantification of emissions for commercial projects presented by the California Air Pollution Control Officer's Association guidance on CEQA and Climate Change (CAPCOA).

The following table summarizes the output results and presents the emissions estimates in metric tonnes (Mt) of CO₂.

Table 4.3-H, Project Construction Equipment Emissions

Year	Total tons CO₂	Total MtCO₂
2010	3,323.15	3,014.71

Evaluation of the table above indicates that an estimated maximum of 3,015 MtCO₂ will occur from project construction equipment over the course of the estimated construction period of four years. The draft SCAQMD GHG threshold guidance document released in October 2008 (SCAQMD 2008b, page 3-8) recommends that construction emissions be amortized for a project lifetime of 30-years to ensure that GHG reduction measures address construction GHG emissions as part of the operational reduction strategies. Therefore, the project's total construction emissions were spread evenly over 30 years and included in the analysis of the project's total operational emissions, below in **Table 4.3-N**.

Long-Term Emissions:

Electricity Related Emissions

Carbon dioxide emissions from electricity generation can be estimated through different methods. The method used in this DEIR takes the project's estimated annual electricity consumption and multiplies this by the average carbon intensity of California. California depends on both electricity generated within the state and imported electricity. Depending on the year, imported electricity accounts for 22 to 32 percent of the total supply. Imported electricity has an average carbon intensity of 544 to 735 Mt/GWh (metric tonnes per gigawatt-hour) while in-state electricity has an average carbon intensity of only 187 to 280 Mt/GWh (CEC 2006a). Taking an average of all of these factors yields the average carbon intensity for electricity supplied to the California grid equal to 343.12 Mt/GWh. Details regarding the calculations are found in Appendix D of the AQIA.

The SCAQMD CEQA Air Quality Handbook provides usage rate tables to determine annual consumption of many types of land uses. The table below estimates the project's annual electricity consumption.

Table 4.3-I, Annual Electricity Consumption

Project Land Use	Quantity (SF)	KWh/Unit/year¹	KWh/year
Warehouse	1,191,080	4.35	5,181,198
Total GWh/year			5.18

By multiplying the total GWh/yr from above by the average California carbon intensity yields total CO₂ emissions for the project equal to 1,778 MtCO₂ annually. This number is conservative because it does not assume a change in average carbon intensity. Actual emissions due to electricity use will likely be smaller due to implementation of SB 1368 which will phase-out the use of out-of-state coal fired power plants and implementation of AB 32 which will probably reduce the carbon intensity throughout the entire state.

Landscape Equipment Related Emissions

Landscape equipment servicing the project site also creates CO₂ resulting from fuel combustion based on the number of business units. The current URBEMIS model calculates these emissions. The following table shows the estimated emissions related to annual landscape maintenance equipment usage.

Table 4.3-J, Landscape Maintenance Equipment Usage

Project Opening Year	Total tons CO₂/year	Total MtCO₂/year
2011	0.51	0.46

Evaluation of the table above estimates that the entire project's annual landscape equipment emissions are 0.46 Mt/CO₂.

Natural Gas Related Emissions

For this analysis, GHG emissions associated with the combustion of natural gas used by the project are a function of natural gas usage at build-out and CO₂ emissions produced when one cubic foot of natural gas is combusted. The current URBEMIS model calculates the CO₂ emissions from the project's annual natural gas usage in short tons based on land use. The following table provides a summary of the model output and converts the results to metric tonnes (Mt) of CO₂.

Table 4.3-K, Natural Gas Emissions

Project Opening Year	Total tons CO₂/year	Total MtCO₂/year
2011	176.38	160.01

Evaluation of the table above shows that the estimated CO₂ emissions from the combustion of natural gas consumed by the project annually are approximately 160 Mt/year.

Other GHG Emissions

Electricity used in water delivery in southern California also plays a large role in GHG production. In a local context, the water service provider for the project will be the Eastern Municipal Water District (EMWD). As stated in Water Supply Assessment (WSA) prepared for this project by EMWD, 80 percent of EMWD potable water supplies are imported. However, the project will be supplied entirely with potable water imported from MWD. (WSA, pp. 5, 16.) The two sources of this water are the State Water project (SWP) and the Colorado River Aqueduct (CRA). The SWP is the largest consumer of electrical energy in the state. The average electricity necessary to pump one acre-foot of water to southern California from the SWP and the CRA is approximately 3,000 kWh and 2,000 kWh, respectively (Wilkinson 2000). Since it is unknown what proportion of the imported water is from SWP and CRA, an estimate of the total energy

requirements for imported water supplies was used and is equal to 3,519 kWh/acre-foot (Wilkinson 2000).

According to WSA for this project, water demand at project build-out is estimated to be 65 acre-foot/year. The table below estimates the project's annual electricity consumption for imported water.

Table 4.3-L, Project Imported Water Electricity Usage

Imported Water Demand (acre-foot/year)	Ave Energy Requirements for Imported Water (kWh/acre-foot)	Imported Water Energy Usage (kWh/year)	Imported Water Energy Usage (GWh/year)
65	3,519.00	228,735	0.23

Evaluation of the table above estimates the project's annual electricity consumption from imported water to be 0.23 GWh. When applying the same equation as used earlier in the electricity related emissions section, annual CO₂ emissions from imported water are approximately 78.48 MtCO₂.

Vehicle Emissions

URBEMIS also calculates the annual CO₂ emission from project-related vehicle usage. The following table shows the project's related vehicular emissions.

Table 4.3-M, Vehicular CO₂ Emissions

Project Year	Opening	Total tons CO₂/year	MtCO₂/year
2011		19,085.20	17,313.80

The table above indicates that CO₂ emissions from the entire project's vehicular traffic are approximately 17,314 Mt annually. The proposed project's main contribution of CO₂ emissions is from motor vehicles, but how much of those emissions are "new" is uncertain. New projects do not create new drivers; therefore, they do not create a new mobile source of emissions. It is probable that the proposed project will only redistribute the existing traffic patterns. Therefore, **Table 4.3-M, Vehicular CO₂ Emissions** overestimates the proposed project's impacts. Additionally, future reductions in GHG emissions from vehicular trips can be expected as a result of implementation of AB 1493 (2002), which requires emissions reductions in California's new light duty vehicle fleet. Those regulations are to be phased-in, starting in model year 2009. Staff at the California Air Resources Board estimate that emissions could be reduced 27 percent by 2030. Nevertheless, even with these future AB 1493-related reductions, vehicular GHG emissions will remain an important component of total project emissions at buildout.

Total Project CO₂ Emissions

As shown in **Table 4.3-N, Annual Project-Related Operational CO₂ Emissions**, using all the emissions quantified above, the total operational carbon dioxide emissions generated from the entire project is approximately 19,427 MtCO₂ per year which includes construction-related emissions amortized over a typical project life of 30 years. The table below indicates that the majority of operational project emissions are from vehicle use followed by electrical consumption at 89 and 9 percent, respectively.

Not included in this estimate are emissions from construction-related activities, as previously described, nor are emissions from wastewater treatment and landfill of solid waste during project operation. The primary GHG of concern from wastewater treatment and landfill material is methane. Methane emissions from wastewater treatment vary widely based upon the wastewater treatment process which is often not under control of the project developer. Methane emissions from large landfills are separately regulated and methane gas recovery is a required element of that regulatory program. The table below, while not an all-inclusive inventory of all project-related GHG, shows the estimation of CO₂ from some of the most important and readily quantified project operation-related sources which are representative of the majority of the project's contribution to global GHG concentrations.

Table 4.3-N, Annual Project-Related Operational CO₂ Emissions

Source	Annual Carbon Dioxide Emissions (Mt)	Percent of Total
Construction Emissions ¹	100.49	0.52%
Electricity	1,777.77	9.15%
Landscape Equipment	0.46	0.002 %
Natural Gas	160.01	0.82 %
Water Electricity	74.48	0.38 %
Vehicular	17,313.80	89.12 %
Total	19,427.01	100 %

Note: ¹ Construction emission amortized over 30 years. (3,014.71 MT CO₂/30 years = 100.49 MT CO₂ per year)

In a global context, the entire project's operational CO₂ emissions represent approximately 7.4 x 10⁻⁵ percent (19,427.01 Mt/ 26.4 Gt) of the Earth's CO₂ emissions from fossil fuel combustion per year (IPCC).

The 2006 CAT Report identifies a recommended list of strategies that the state could pursue to reduce climate change GHG emissions. These are strategies that could be implemented by various state agencies to ensure that the Governor's targets are met and can be met with existing authority of the state agencies. **Table 4.3-O, Climate Action Team Strategy Project Comparison**, below, compares the project with relevant strategies from this list.

Table 4.3-O, Climate Action Team Strategy Project Comparison

CAT Strategy to Reduce Greenhouse Gas Emissions	Project Design/Mitigation to Comply with Strategy
Vehicle Climate Change Standards and Other Light Duty Vehicle Technology	Consistent. These are CARB enforced standards; vehicles that access the project that are required to comply with the standards will comply with the strategy
Low-Carbon Fuels Standard	Consistent. These measures will apply to gasoline. When CARB adopts regulations for these reduction measures, vehicles that access the project will be required to be powered by fuels that comply with the standard.
Diesel Anti-Idling	Consistent. In July 2004, the CARB adopted a measure to limit diesel-fueled commercial motor vehicle idling to less than 5 minutes within 100-feet of residences. No residences are located within 100 feet of the project site.
Transportation Refrigeration Units	Consistent. This measure applies to projects where TRUs access the site. Measures to reduce emissions include installing electrification in applicable projects (e.g., truck stops, warehouses, etc.) MM Air 11 achieves this strategy.
Heavy-Duty Vehicle Emission Reduction Measures	Consistent. These are CARB-enforced standards related to improved aerodynamics, climate engine-based improved efficiency, vehicle weight reduction, and rolling and inertia resistance improvements, an education program for the heavy duty vehicle sector as well as the light and medium duty vehicle sectors that would educate drivers as to how to optimize vehicle operation. Those vehicles, subject to these CARB-enforced standards that access the proposed project, will be required to comply with those standards, thereby complying with this strategy.
Alternative Fuels: Biodiesel and Ethanol	Consistent. These are CARB-enforced standards which could require the use of 1 to 4 percent biodiesel displacement of California diesel fuel and the increase in the percentage of ethanol used in gasoline to the maximum 10 percent (E-10) that is compatible with current vehicles. When CARB adopts regulations for these reduction measures, vehicles that access the project will be required to be powered by fuels that comply with the standard.
Achieve 50% Statewide Recycling Goal	Consistent. The Riverside Countywide Integrated Waste Management Plan (CIWMP), adopted by the Riverside County Board of Supervisors on January 14, 1997, and approved by the California Integrated Waste Management Board CIWMB on September 23, 1998, outlines the goals, policies, and programs the County and its cities, including the City of Perris, will implement to create an integrated and effective waste management system that complies with the provisions in AB 939 and its diversion mandates. The CIWMP is comprised of the Riverside Countywide Summary Plan, the Source Reduction and Recycling Element (SRRE) for the County and each of its cities, the Nondisposal Facility Element (NDFE) for the County and each of its cities, the Household Hazardous Waste Element (HHWE) for the County and each of its cities, and the Riverside Countywide Siting Element. The project

	will be required to comply with the City of Perris programs for recycling and waste reduction which comply with the 50% reduction required in AB 939.
Urban Forestry	Consistent. Currently the site does not include any trees. Trees act as insulators from weather thereby decreasing energy requirements. Onsite trees also provide carbon storage. Landscaping is required including the planting of street trees which do not currently exist on-site.
Water Use Efficiency	Consistent. Features to increase water use efficiency include the installation of separated piping and the use of non-potable water provided by EMWD to maximum extent practicable
Building Energy Efficiency	Consistent. Project will be compliant with the current Title 24 standards. Additionally, MM Air 15 states that the project shall be required to increase building energy performance 14 percent beyond Title 24, and reduce water use by 20 percent, prior to issuance of any building permits.
Smart Land Use and Intelligent Transportation Systems	Consistent. Project provides jobs in a housing-rich area, thus offering the potential for workers already living in the area to reduce their commute.
Green Buildings Initiative	Consistent. Governor Schwarzenegger's Green Building Executive Order, S-20-04, sets an ambitious goal of reducing energy use in public and private buildings by 20 percent by the year 2015, as compared with 2003 levels. The Executive Order and related action plan spell out specific actions state agencies are to take with state-owned and -leased buildings. The order and plan also discuss various strategies and incentives to encourage private building owners and operators to achieve the 20 percent target. The project shall be required to increase building energy performance 14 percent beyond Title 24, and reduce water use by 20 percent, prior to issuance of any building permits; which is consistent with the Green Building Initiative.
Source: California Environmental Protection Agency, <i>Climate Action Team Report to Governor Schwarzenegger and the Legislature</i> , March 2006.	

Based on its consistency with relevant CAT 2006 strategies and given the global nature of GHG and their ability to alter the Earth's climate, it is not anticipated that a single development project would have a measurable effect on global climate conditions. However, the proposed project would generate daily operational criteria pollutant emissions of VOC and NO_x that exceeds the thresholds of significance recommended by the SCAQMD for criteria pollutants. Therefore, the City of Perris is taking the conservative approach and determining that the contribution of the project emissions to the state-wide cumulative impact would be considerable.

Threshold: *Exposing sensitive receptors to substantial pollutant concentrations.*

- ***Expose sensitive receptors to any Toxic Air Contaminant (TAC), at a level that exceeds 10 excess cancer cases per one million people (per SCAQMD)***

Health risk assessments are commonly used to estimate the health risks to the surrounding community from projects that will be a source of diesel emissions; and hence, increase the

amount of diesel particulate matter (DPM) in the area. The proposed project consists of Light Industrial land uses which will result in DPM emissions from project-generated truck traffic. The project site is surrounded by land which is designated Light Industrial, Public/Semi-Public Facilities/Utilities or Commercial.

In order to assess the potential health risk to the surrounding land uses, an HRA was prepared for the project (contained in Appendix B). The following is a summary of the results in the HRA.

The risk assessment guidelines established by SCAQMD and followed in this analysis are designed to produce conservative (high) estimates of the risks posed by DPM. The conservative nature of the analysis is due to the following factors:

- The CARB-adopted diesel exhaust unit risk factor of 300 per million per $\mu\text{g}/\text{m}^3$ is based upon the upper 95 percentile of estimated risks for each of the epidemiological studies reviewed and used to develop this unit risk factor. Consequently, this risk factor is already a conservative estimate of the risk posed by DPM.
- The residents at the sensitive receptor locations are assumed to remain outdoors (or have continual contact with outside air) at home for 24-hours a day, 365 days a year, for 70 continuous years.
- As a conservative measure, the SCAQMD does not recognize indoor adjustments for residents. However, a study published in the *Journal of Air and Waste Management Association* in 2001 (Cackette/Lloyd) shows that the typical person spends approximately 87 percent of their time indoors, 5 percent of their time outdoors, and 7 percent of their time in vehicles. In addition, people who reside indoors without an indoor source of diesel exhaust are expected to have lower levels of DPM. A DPM exposure assessment showed that the average indoor concentration is $2.0 \mu\text{g}/\text{m}^3$, compared with an outdoor concentration of $3.0 \mu\text{g}/\text{m}^3$.

Cancer risks are based upon mathematical calculations which estimate the probability of the number of people who will develop cancer after 24-hours a day, 365 days a year exposure to DPM at the same concentration for a period of 70 years. The cancer risks from DPM occur exclusively through the inhalation pathway; therefore, the maximum individual cancer risk (MICR) can be estimated from the following equation:

$$*\text{MICR}_{\text{DPM}} = \text{CP}_{\text{DPM}} \cdot \text{DI}_{\text{DPM}}$$

where,

MICR_{DPM} Cancer risk from diesel particulate matter (DPM); the probability of an individual developing cancer as a result of exposure to DPM.

CP_{DPM}¹ Cancer Potency factor for DPM ($\text{mg}/\text{kg}\cdot\text{day}$)⁻¹; estimated probability that a person will contract cancer as a result of inhalation of a DPM concentration of 1mg per kilogram of bodyweight continuously over a period of 70 years CP_{DPM} value of $1.1 (\text{mg}/\text{kg}\cdot\text{day})^{-1}$

DI_{DPM} Dose through inhalation ($\text{mg}/\text{kg}\cdot\text{day}$)

obtained by multiplying $C_{\text{air}} \times \text{DBR} \times \text{EVF} \times 10^{-6}$

- C_{air} is the Annual Average 24 hour per day concentration of DPM in air ($\mu\text{g}/\text{m}^3$) (calculated by ISC-ST3).
- DBR is the daily breathing rate
 - To be most protective, the most sensitive value of 302 (liters/kg-day) was used,²
 - For off-site workers, the value of 149 (liters/kg-day) was used to reflect an 8-hour work day.
- EVF is the exposure factor
 - Most sensitive value of 0.96 used.³
 - Commercial/industrial receptor value of 0.38 was used.

* Table of data used in calculations can be found in Appendix A of the HRA.

1. From the 2005 “Consolidated Table of OEHHA/ARB Approved Risk Assessment Health Values”
2. From Table 9A of 2005 “AQMD Risk Assessment Procedures for Rules 1401 and 212”
3. From Table 9B of 2005 “AQMD Risk Assessment Procedures for Rules 1401 and 212”

This probability is usually expressed in terms of the number of people who will develop cancer per one million people who are also exposed. It is important to understand that this cancer risk represents the probability that a person develops some form of cancer; the estimated risk does not represent actual mortality rates.

The specific calculations and assumptions used to determine the cancer risks are included in the HRA located in Appendix C of this document.

The HRA analyzed three scenarios according to information contained in the project-specific Traffic Study (Appendix J): existing conditions, proposed project only, and cumulative conditions which include truck traffic from existing conditions, project-generated traffic, and other approved projects in the project vicinity. These scenarios represent cancer risks from the modeled traffic only, and as such, do not include background DPM concentrations. This approach is in accordance with current SCAQMD methodology to analyze the project’s maximum incremental cancer and non-cancer risk.

Currently without the proposed project, none of the sensitive receptors within the project vicinity are exposed to cancer risks from DPM that exceed the SCAQMD threshold of 10 excess cancer cases per one million people. The area of highest risk, at a level of 2.2 in a million, can be found on the southeastern corner of the Val Verde High School Campus, which is approximately 0.35 miles south of Ramona Expressway and less than a tenth of a mile east of Interstate 215. The risk to off-site workers adjacent to the project site from existing DPM emissions within the project vicinity ranges from 0.1 to 1.4 in one million, which is less than the SCAQMD threshold of 10 excess cancer cases in one million.

To model the unmitigated project-only scenario, all project trucks were assumed to idle at their respective truck bays for 10 minutes. The maximum unmitigated cancer risks to sensitive receptors within the project vicinity due to DPM emissions from project-related diesel truck traffic was found to be at a level of 2.1 excess cancer cases in one million; less than the SCAQMD threshold of the 10 excess cancer cases per one million people. The risk to off-site

workers adjacent to the project site, from project-related DPM emissions, ranges from 0.1 to 0.7 in one million; less than the SCAQMD threshold of 10 excess cancer cases in one million.

In addition, other planned projects in the area will generate diesel exhaust; and the combination of existing conditions, other planned projects, and this project will result in sensitive receptors within the project vicinity potentially being exposed to a maximum cancer risk of 3.8 excess cancer cases in one million; again, this is less than the SCAQMD threshold of 10 excess cancer cases in one million. The cancer risk faced by off-site workers in the project vicinity from DPM emissions from existing traffic, project-generated traffic, and traffic generated by cumulative projects ranges from 0.7 in one million to 2.0 in one million, which does not exceed the SCAQMD threshold of significance. However, it should be noted that the SCAQMD threshold relates to the project's incremental contribution to cancer risk and is not intended to be compared with the effects of multiple projects, both existing and planned.

Therefore, excess cancer risks to both industrial/commercial and sensitive receptors are considered **less than significant** and mitigation measures are not required.

- *Expose sensitive receptors to a hazard index of 1.0 or greater using a chronic reference exposure level for chronic non-cancer risks associated with TACs (per SCAQMD)*

Non-cancer risks can be described as acute (short-term, generally 1-hour peak exposures) or chronic (long-term exposure, defined as 12 percent of a lifetime or about 8 years for humans) health impacts. SCAQMD recognizes and uses the acute and chronic reference exposure levels (REL) developed by OEHHA for determining non-cancer health impacts of toxic substances. Exceeding the acute or chronic REL does not necessarily indicate that an adverse health impact will occur; however, levels of exposure above the REL have an increasing but undefined probability of resulting in an adverse health impact, particularly in sensitive individuals. For Diesel Particulate Matter (DPM), there is no value for the acute REL and the chronic REL is 5 $\mu\text{g}/\text{m}^3$.

Therefore, non-cancer health risks are expected when people are exposed to short-term DPM concentration greater than 5 $\mu\text{g}/\text{m}^3$. Since the hazard index is the ratio between the DPM concentration at each receptor (estimated using ISCST3) and the chronic REL, then non-cancer health risks are significant if the hazard index exceeds 1.0. This threshold for significance is sanctioned by SCAQMD and CARB explicitly to determine the non-cancerous health impacts attributable to projects that introduce new sources of diesel exhaust emissions in an area.

The relationship for the non-cancer health effects of DPM is given by the following equation:

$$\text{HI}_{\text{DPM}} = \text{C}_{\text{DPM}} / \text{REL}_{\text{DPM}}$$

where,

HI_{DPM} Hazard Index; an expression of the potential for non-cancer health effects.

C_{DPM} Annual average DPM concentration in $\mu\text{g}/\text{m}^3$.

REL_{DPM} Reference exposure level (REL) for DPM; the DPM concentration at which no adverse health effects are anticipated.

The maximum DPM concentration of $0.03921 \mu\text{g}/\text{m}^3$ occurs in the project vicinity under project-only conditions. Using the equation above, the hazard index is 0.008, which is less than one percent of the allowable threshold. Therefore, non-cancer risks are considered **less than significant** and no mitigation measures are required.

Threshold: *Create objectionable odors affecting a substantial number of people.*

Odor sensation is a personal response. Not all people are equally sensitive; and they do not always agree about the severity of an odor, once it is detected. The human nose is still the best means of determining the strength of an odor. Precise documentation of the strength and nature of an odor is generally unavailable because of the large number of gases involved and their effects on each other. Additionally, odor measurement is difficult because no instrument has been found to successfully measure odor and all its components.

However, the project presents the potential for generation of objectionable odors during construction to the immediate vicinity of the project site from diesel exhaust; and paving and architectural coatings applications. Odors generated during construction and grading will be short-term and not result in a long-term odorous impact to the surrounding area.

The nearest sensitive receptor is approximately 397 meters (approximately 1,300 feet) south of the project boundary line. The prevailing wind is generally from northwest to southeast with wind speeds up to 17 mph approximately 20 percent of the time, and an average wind speed of approximately 4.5 mph. In addition to wind direction, distance is important. Odor intensity decreases as distance from the source increases. Distance allows fresh air to mix with the odors, resulting in decreased odor intensity. Due to wind direction, the sensitive receptors $\frac{1}{2}$ a mile to the east southeast of the project site would have the potential to be the most impacted. Studies have shown that the typical person spends approximately 87 percent of their time indoors, 5 percent of their time outdoors, and 7 percent of their time in vehicles (Lloyd, A.C.; Cackette, T.A.; *Diesel Engines: Environmental Impact and Control*, Journal of Air & Waste Management Assoc. 51:809-847). The quantity of time that people spend indoors also substantially reduces their exposure to potential odors.

Recognizing the short-term duration and quantity of emissions in the project area and the limited outdoor exposure of persons to outdoor odors, the project will not expose substantial numbers of people to objectionable odors. Impacts from short-term construction odors are considered less than significant.

Since the project consists of light industrial uses, the trucks utilizing the project may emit odors during operation in the form of diesel exhaust; however, there are regulations from the CARB related to diesel fuel contents that are intended to reduce the amount of odor from diesel exhaust. These rules and regulations, along with **MM Air 10** below which limits idling time, will help to reduce impacts related to odors from the project operation to less than significant levels.

Therefore, construction and operational impacts related to odors from the project are considered **less than significant**.

Proposed Mitigation Measures

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (CEQA Guidelines, Section 15126.4). Mitigation measures were evaluated for their ability to reduce or eliminate impacts.

The following mitigation measures recommended by the 2004 City of Perris General Plan EIR shall be implemented in order to reduce emissions associated with project construction:

MM Air 1: Electricity from permanent or temporary power poles shall be used instead of temporary diesel- or gasoline-powered generators to reduce the associated emissions.

MM Air 2: All retail/commercial/industrial land uses shall apply paints using either high volume low pressure (HVLP) spray equipment with a minimum transfer efficiency of at least 50% or other application techniques with equivalent or higher transfer efficiency.

MM Air 3: Prior to issuance of the grading permit(s), the applicant(s) shall submit a traffic control plan that will describe in detail safe detours and provide temporary traffic control during construction activities. To reduce traffic congestion, and therefore NO_x, the plan shall include, as necessary, appropriate, and practicable, the following: temporary traffic controls such as a flag person during all phases of construction to maintain smooth traffic flow, dedicated turn lanes for movement of construction trucks and equipment on- and off-site, scheduling of construction activities that affect traffic flow on the arterial system to off-peak hour, rerouting of construction trucks away from congested streets or sensitive receptors, and/or signal synchronization to improve traffic flow.

In addition to compliance with SCAQMD Rule 403 (see page 3.3-35) for construction of the project, the following mitigation measures shall be implemented:

MM Air 4: During construction, all vehicles and equipment shall be properly maintained according to manufacturers' specifications at an offsite location, which includes proper tuning and timing of engines. Equipment maintenance records and equipment design specification data sheets shall be kept on-site during construction.

MM Air 5: The project developer shall require by contract specification that construction equipment used for construction meets or exceeds Tier 3 standards. Alternatively, all construction equipment shall be equipped with CARB-verified oxidation catalysts, diesel particulate traps or other verified or certified retrofit technologies with the greatest control efficiency for the specific category of equipment. Contract specifications shall be included in project construction documents, which shall be reviewed by the City of Perris prior to issuance of a grading permit.

MM Air 6: All construction vehicles shall be prohibited from idling in excess of five minutes, both on-site and off-site.

MM Air 7: Construction parking shall be configured to minimize traffic interference.

MM Air 8: To reduce VOC emissions associated with architectural coating, the project designer and contractor shall reduce the use of paints and solvents by utilizing pre-coated materials (e.g. bathroom stall dividers, metal awnings), materials that do not require painting, and require coatings and solvents with a VOC content lower than required under Rule 1113 to be utilized.

The construction contractor shall be required to utilize “Super-Compliant” VOC paints, which are defined in SCAQMD’s Rule 1113. Construction specifications shall be included in the building specifications that assure these requirements are implemented. The specifications shall be reviewed by the City of Perris’ Building Division for compliance with this mitigation measure prior to issuance of a building permit.

MM Air 9: The developer shall comply with SCAQMD Rule 403. The developer shall provide the City of Perris with the SCAQMD-approved dust control plan, or other sufficient proof of compliance with Rule 403, prior to grading permit issuance.

In order to reduce emissions related to diesel, VOC, and NO_x emissions from project operation, the following mitigation measures shall be implemented:

MM Air 10: All vehicles shall be prohibited from idling in excess of five minutes.

MM Air 11: Loading bays shall be equipped with electrification, and/or auxiliary power units.

MM Air 12: Roads and parking areas shall be paved.

MM Air 13: The project shall post contact information outside the facility for the public to call if a specific air quality issue arises.

MM Air 14: ~~The project shall provide information about diesel particulate traps and alternative fueled off road equipment to all customers.~~ In order to promote alternative fuels, and help support “clean” truck fleets, the developer/successor-in-interest shall provide building occupants and businesses with information related to SCAQMD’s Carl Moyer Program, or other state programs that provide funding for cleaner than required heavy-duty engines and emission control devices, such as 2007 or newer model year or 2010 compliant vehicles.

MM Air 14a: Service equipment at the facility will be either low-emission propane powered or electric. (i.e., forklifts).

In order to reduce GHG emissions from operation of the entire project, the following mitigation measures shall be implemented:

MM Air 15: The project shall be, at a minimum, required to increase building energy performance 14 percent beyond Title 24, and reduce water use by 20 percent. Prior to issuance of any building permits, building plans shall include proof of these reductions.

MM Air 16: The project shall be required to use recycled materials for at least 15 percent of construction materials⁵. Regional materials that are extracted, processed, and manufactured regionally will also be required to account for 10 percent of the project.

MM Air 17: The project shall be required to recycle and/or salvage at least 75 percent of non-hazardous construction and demolition debris by weight and volume.

MM Air 18: In order to reduce energy consumption from the proposed project development, applicable plans (e.g., electrical plans, improvement maps, etc.) submitted to the City shall include the installation of energy-efficient street lighting throughout the project site. These plans

⁵ Percentage of recycled materials: Based on cost for building materials, Based on volume for roadway, parking lot, sidewalk and curb materials, and recycled materials may include: salvaged, reused, and recycled content materials

shall be reviewed and approved by the applicable City Department (e.g., Building Division or Department of Public Works/Engineering) prior to conveyance of applicable streets.

Summary of Environmental Effects After Mitigation Measures Are Implemented

In an effort to reduce estimated emissions, the mitigation measures listed above were considered. **MM Air 1** through **9** are associated with reduction in construction-related emissions for all criteria pollutants. **MM Air 10** aims to reduce truck idling times which reduce criteria pollutant emissions. **MM Air 15** and **18** are mainly associated with energy efficiency, material conservation, and reduction of GHG emissions.

Although implementation of mitigation measures **MM Air 1** through **9** will reduce project-generated emissions, there are no distinct quantitative reductions associated with them; therefore to be conservative, this conclusion assumes there is no change in the estimated emissions of the project from those mitigation measures. Even with the incorporation of **MM Air 1** to **MM Air 9**, projected short-term emissions from construction of the project are above applicable SCAQMD regional thresholds for VOC, NO_x, PM-10, and PM-2.5 during construction. The project's short-term construction emissions will still exceed the SCAQMD regional significance thresholds. However, short-term emissions are below SCAQMD's localized significance thresholds. **Therefore, short-term emissions from the project are considered regionally significant but not on a localized level.**

Criteria Pollutants

Implementation of **MM Air 15** will reduce project-generated operational emissions from natural gas usage by 16.7 percent for VOC, 14.8 percent for NO_x, and 14.7 percent for CO for both summer and winter. The following tables (**Tables 4.3-P** and **4.3-Q**) show the mitigated project-generated operational emissions.

Table 4.3-P
Mitigated Estimated Daily Project Operation Emissions (Summer)

Activity/Year	Peak Daily Emissions (lb/day)					
	VOC	NO _x	CO	SO ₂	PM-10	PM-2.5
SCAQMD Daily Thresholds	55	55	550	150	150	55
Natural Gas	0.05	0.69	0.58	0.00	0.00	0.00
Landscaping	0.12	0.02	1.55	0.00	0.01	0.01
Architectural Coatings	6.97	-	-	-	-	-
Vehicles	58.35	475.64	470.64	1.02	109.83	32.68
Total	65.49	476.35	472.77	1.02	109.84	32.69
Exceeds Threshold?	Yes	Yes	No	No	No	No

Table 4.3-Q
Mitigated Estimated Daily Project Operation Emissions (Winter)

Activity/Year	Peak Daily Emissions (lb/day)					
	VOC	NO _x	CO	SO ₂	PM-10	PM-2.5
SCAQMD Daily Thresholds	55	55	550	150	150	55
Natural Gas	0.05	0.69	0.58	0.00	0.00	0.00
Landscaping	0.12	0.02	1.55	0.00	0.01	0.01
Architectural Coatings	6.97	-	-	-	-	-
Vehicles	62.58	529.43	452.24	0.96	109.83	32.68
Total	69.72	530.14	454.37	0.96	109.84	32.69
Exceeds Threshold?	Yes	Yes	No	No	No	No

There is no change in terms of exceeding the SCAQMD thresholds of significance related to long-term operational emissions after mitigation. The project's long-term operational emissions will still exceed the SCAQMD regional significance thresholds for VOC and NO_x in the summer and winter. However, no long-term localized significance thresholds will be exceeded during project operation. Therefore, long-term emissions from the project are considered regionally significant, but not on a localized level.

Cumulative Impacts

The project's short-term construction emissions for VOC, NO_x, PM-10, and PM-2.5 and long-term operational emissions for VOC and NO_x have been shown to be significant on a regional level. Since the project's short-term and long-term emissions are above thresholds for at least one pollutant, it is considered to result in a **cumulatively considerable net increase** in ozone, which is non-attainment in the region under both state and federal standards and **cumulative impacts are considered significant**.

Consistency with AQMP

Since the project will be developed with land uses that are in accordance with the approved general plan land use designations of Light Industrial and Public/Semi-Public Utilities, the project is also considered to be in compliance with the AQMP and **impacts are considered to be less than significant**.

Objectionable Odors

Neither the project's construction nor operation will create objectionable odors affecting a substantial number of people; therefore, the impact is considered **less than significant without mitigation**.

Greenhouse Gases (GHG)

The credits listed above in **Table 4.3-B** incorporate various design features which will increase the project's overall performance in each of the five categories from project design and construction through operations and maintenance. The specific features (credits) that will be implemented from **Table 4.3-B** are preliminary at this time and will not be completed until after the project is approved.

The mitigation measure listed above (**MM Air 15**) was considered in an effort to quantify emissions reductions related specifically to building energy performance and efficiency beyond Title 24 as well as reduce the project's water demand. **MM Air 15** ensures that the proposed project's energy efficiency exceeds Title 24 by 14 percent, which is quantifiable in URBEMIS 2007 and corresponds to a reduction in natural gas usage, as shown in **Table 4.3-R**, below.

**Table 4.3-R, Annual Project-Related Operational CO₂ Emissions
(Mitigated)**

Source	Annual Carbon Dioxide Emissions (Mt)	Percent of Total
Construction Emissions ¹	100.49	0.52 %
Electricity	1,777.77	9.16 %
Landscape Equipment	0.46	0.002 %
Natural Gas	137.60	0.71 %
Water Electricity	74.48	0.38 %
Vehicular	17,313.80	89.23 %
Total	19,404.60	100 %

Note: ¹ Construction emission amortized over 30 years. (3,014.71 MT CO₂/30 years = 100.49 MT CO₂ per year)

As seen in the table above, emissions of CO₂ from natural gas were slightly reduced utilizing the reduction in URBEMIS to Increase Energy (Industrial) Efficiency Beyond Title 24 by 14 percent. The percent of total project-related operational CO₂ emissions from natural gas usage is reduced by approximately 22 MtCO₂ per year.

Through project design and mitigation, the project is making an effort to reduce its carbon footprint. However, the proposed project would generate daily operational criteria pollutant emissions of VOC and NO_x that exceeds the threshold of significance recommended by the SCAQMD. Therefore, the City of Perris is taking the conservative approach and determining that the contribution of the project's GHG emissions to the state-wide cumulative impact would be considerable.

Toxic Air Contaminants

The project does not create the potential exposure of sensitive receptors to DPM concentrations exceeding the SCAQMD threshold of 10 excess cancer cases per one million people; therefore, impacts related to excess cancer risk are **considered to be less than significant without mitigation.**

The proposed project's DPM emissions were found to be below the hazard index (used to quantify the significance of non-cancer health risks) and are considered **less than significant without mitigation.**

Summary of Cumulative Environmental Effects After Mitigation Measures Are Implemented

The project emissions exceed regional thresholds during construction for VOC, NO_x, PM-10, and PM-2.5 and during operation for VOC and NO_x. Since the project exceeds thresholds and the portion of the SCAB within which the proposed project is located is designated as a non-attainment area for ozone, PM-10, and PM-2.5 under both state and federal standards, **the project is considered cumulatively significant.**

Regarding global climate change and GHG emissions as discussed above, project design and mitigation will help reduce the intensity of project-related emissions. Even in the absence of the project, the impacts associated with global climate change will still exist, however it is recognized that the contribution of the project emissions state-wide global climate change impact would be considerable.

4.4 BIOLOGICAL RESOURCES

Potential impacts related to interference of movement of any native resident, migratory fish, or wildlife species; and that conflict with local policies or ordinance protecting biological resources were all found to be less than significant in the Initial Study/NOP prepared for this project (Appendix A). The focus of the following discussion is related to the potential impacts from an 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; that conflict with any local policies or ordinances protecting biological resources; or, that conflict with the provisions of an adopted Habitat Conservation Plan.

In addition to other documents, the following references were used in the preparation of this section of the DEIR:

- AMEC Earth & Environmental, Inc. *Rados Distribution Center-Perris, General Biological Resources Assessment*, Updated March 17, 2010. (Appendix D)
- City of Perris, *City of Perris General Plan 2030, Conservation Element*, July 12, 2005. (Available at the City of Perris and at www.cityofperris.org/city-hall/general-plan/Conservation_Element_01-08-09.pdf, accessed on January 28, 2009.)
- County of Riverside, *Western Riverside County Multiple Species Habitat Conservation Plan*, Adopted June 17, 2003. (Available at the City of Perris Planning Department.)
- Riverside County Habitat Conservation Agency, *Habitat Conservation Plan for the Stephens' Kangaroo Rat in Western Riverside County, California*. 1996. (Available at <http://www.skrplan.org/skr.html>, accessed February 12, 2010.)

Setting

The project site consists of a proposed development on approximately 61.63 gross acres and is located on the U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle for Perris in Section 7, Township 4 South, Range 3 West, San Bernardino Base & Meridian. The project site is rectangular in shape and is bounded by Webster Avenue on the west, Rider Street on the south, and Indian Avenue on the east.

Regional Context

The surrounding area was formerly agricultural but is transitioning into predominantly industrial uses. The project site lies adjacent to another tract of agriculture fields to its east, a restaurant to the west, and existing industrial complexes occupy the parcels to its north and south. Adjacent properties feature tree tobacco, mustard, various grasses and weeds. Slightly off-site to the north, along the north-facing slope of the Metropolitan Water District (MWD) channel, a sparse Coastal Sage Scrub community occurs, characterized by scattered California Buckwheat (*Eriogonum fasciculatum*) and a few California Sagebrushes (*Artemisia californica*).

Project Site Description

The elevation of the essentially flat site ranges from 1470 to 1493 feet. The project site consists mainly of leveled farmland which was formerly a sod farm. Recent discing of the former sod farm as well as the leased portion (2.60 acres) of the MWD parcel to the north indicates that the site is still considered agriculture. The native vegetation has been removed in the project area. Soils on the site are mainly sandy loams that do not normally contain alkalinity, salinity, or high clay content associated with vernal pools, alkaline flats, or sensitive plant species.

Vegetation Community Descriptions

The site lacks native plant communities, and even weedy species are limited to the roadsides and margins of the site that cannot be disced due to the presence of fences and roads. Additional plants present on the project site include: Tumbling Pigweed (*Amaranthus albus*), California Sagebrush (*Artemisia californica*), Common Horserweed (*Conyza Canadensis*), Grassland Goldenbush (*Ericameria palmeri*), Cudweed Aster (*Lessingia filaginifolia*), Mulefat (*Baccharis salicifolia*), Western Sunflower (*Helianthus annuus*), European Wild Lettuce (*Lactuca serriola*), Stink-net (*Oncosiphon piluliferum*), Common Groundsel (*Senecio vulgaris*), Prickly Sow-thistle (*Sonchus asper*), Common Sow-thistle (*Sonchus oleraceus*), Common Fiddleneck (*Amsinckia menziesii* var. *intermedia*), Alkali Heliotrope (*Heliotropium curassavicum*), Shortpod Mustard (*Hirshfeldia incana*), Lesser Watercress (*Lepidium didymus*), London Rocket (*Sisymbrium irio*), Boccone's Sand Spurry (*Spergularia bocconeii*), Serrate-leaved Saltbrush (*Atriplex suberecta*), Mexican Tea (*Chenopodium ambrosioides*), Pitseed Goosefoot (*Chenopodium berlandieri*), Nettle-leaved Goosefoot (*Chenopodium murale*), Russian Thistle (*Salsola tragus*), Doveweed (*Eremocarpus setigerus*), Cheeseweed (*Malva parviflora*), California Buckwheat (*Eriogonum fasciculatum*), Common Knotweed (*Polygonum aviculare*), Black Willow (*Salix gooddingii*), Jimson Weed (*Datura wrightii*), Tree Tobacco (*Nicotiana glauca*), Mediterranean Tamarisk (*Tamarix ramosissima*), Wild Oats (*Avena* sp.), Red Brome (*Bromus madritensis* ssp. *Ruben*), Ripgut Grass (*Bromus diandrus*), Glaucous Barley (*Hordeum murinum*), Dense-flowered Sprangletop (*Leptochloa uninervia*), Annual Bluegrass (*Poa annua*).

The most conspicuous plant on the site is Russian Thistle (*Salsola tragus*). The fenceline across the north portion of the site has allowed the growth of Tree Tobacco (*Nicotiana glauca*), the tallest plant found on the site. Both of these plants are non-native as are a majority of the plants identified on site. The project site contains no oak trees.

Common Wildlife Species

During the general biological habitat assessment of the project site, no reptile or amphibian species were recorded on the site. However, had the assessment been conducted in spring or summer, common reptiles including Side-blotched Lizard (*Uta stansburiana*), Western Fence Lizard (*Sceloporus occidentalis*), and the Gopher Snake (*Pituophis catenifer*) would certainly be revealed.

Birds observed included those species that are accustomed to human presence and expected resident species such as the House Finch (*Carpodacus mexicanus*), Common Raven (*Corvus*

coraz), Morning Dove (*Zenaida macroura*), American Crow (*Corvus brachyrhynchos*), as well as winter visitors White-crowned Sparrow (*Zonotrichia leucophrys*) and Savannah Sparrow (*Passerculus sandwichensis*).

The observed mammals Desert Cottontail (*Sylvilagus audubonii*), California Ground Squirrel (*Spermophilus beecheyi*), Botta's Pocket Gopher (*Thomomys bottae*) and canine (feral dog/Coyote [*Canis latrans*]), are those found throughout the region. An abundance of burrows in the channel north of the site indicates a small mammal fauna not readily identified. Large burrows indicate denning by canines and/or San Diego Black-tailed Jackrabbit (*Lepus californicus bennettii*), as well as occupation by at least one Burrowing Owl (*Athene cunicularia*).

Jurisdictional Wetlands

There are no watercourses, or riparian habitat on the project site. Additionally, there are no hydrological or soil indicators of wetlands on the project site. There are a few riparian plants present on-site that are remnants of long-term agricultural activities, including ponding. The MWD channel to the north covers a pipeline in which surface water does not pond nor does water enter or leave the channel via culverts. Therefore, there are no areas of this site that require a jurisdictional assessment.

Special Status Species

Special-status habitat types are those vegetation communities that support rare, threatened, or endangered plant or wildlife species or are diminishing and are of special concern to resource agencies. The Western Riverside County MSHCP (of which the City of Perris is a signatory) provides protection for this sensitive vegetation community.

Plants

The potential occurrence of nine MSHCP-covered sensitive plant species, based on known occurrences, are considered to be “absent” or have a “low” probability of occurrence. Absence can only be positively determined through focused surveys using appropriate protocols based on seasonality and vegetative/floristic characters, but the habitat associations, topography, soils, and hydrology (or lack thereof) allows for absence to be predicted. Occurrence potential is based on the conclusion that there are no vernal pools on the project site. The following **Table 4.4-A, Special Status Plants**, provides a list of special status plant species with a potential to occur on or in the immediate vicinity of the project site. However, no special status plant species are expected to occur on-site.

Table 4.4-A, Special-Status Plants

Species Name	Status	Habitat Requirements	Potential for Occurrence On Site
Coulter's goldfields <i>Lasthenia glabrata ssp. coulteri</i>	Federal: None State: None	Grasslands, playas, sinks, vernal pools, to 4000' elev.	Absent, lacks suitable habitat
Long-spined spinflower <i>Chorizanthe polygonoides var. longispina</i>	Federal: None State: None	Clay soils, openings in coastal sage scrub, chaparral, grasslands, 100-4750' elev.	Absent, lacks suitable habitat
Moran's navarretia <i>Navarretia fossalis</i>	Federal: FT State: None	Vernal pools, marshes, swamps, playas, chenopod scrub, clay soils, 100-4250' elev.	Absent, lacks suitable habitat
Parish's brittlescale <i>Atriplex parishii</i>	Federal: None State: None	Chenopod scrub, vernal pools, playas, drying alkali flats with fine soils, 100-6250' elev.	Absent, lacks suitable habitat
Payson's Jewel-flower <i>Caulanthus simulans</i>	Federal: None State: None	Pinyon-juniper woodland, coastal sage scrub, chaparral	Absent, lacks suitable habitat
San Jacinto Valley crownscale <i>Atriplex coronata var. notatior</i>	Federal: FE State: None	Endemic to Riverside County, silty-clay soils, Chenopod scrub, seasonal wetlands, vernal pools, playas, grasslands, 1250-1800' elev.	Absent, lacks suitable habitat
Smooth tarplant <i>Centromadia pungens ssp. laevis</i>	Federal: None State: None	Chenopod scrub, playas, riparian woodlands, meadows, vernal pools, grassland, to 1600' elev.	Low
Thread-leaved brodiaea <i>Brodiaea filifolia</i>	Federal: FT State: SE	Chaparral, cismontane woodlands, coastal sage scrub, playas, vernal pools, grasslands, clay soils, 100-1800' elev.	Absent, lacks suitable habitat
Wright's trichocoronis <i>Trichocoronis wrightii var. wrightii</i>	Federal: None State: None	Alkaline habitats, meadows, marshes swamps, riparian forests, vernal pools to 1450' elev.	Absent, lacks suitable habitat

Federal

FE – Federally Endangered

FT – Federally Threatened

State

SE – State Endangered

ST – State Threatened

Wildlife

Table 4.4-B, Special-Status Wildlife, presents MSHCP covered wildlife species that were identified as potentially occurring on the project site. This determination is based on the proximity of records; however, habitat requirements for the species eliminates the listed species from further consideration. Several Special Concern species have low-moderate occurrence potential, but the project site is not within an MSHCP Criteria Cell, so no further analysis is warranted except for Burrowing Owl.

Table 4.4-B, Special-Status Wildlife

Species Name	Status	Habitat Requirements	Potential for occurrence
REPTILES, AMPHIBIANS			
Southwestern Pond Turtle <i>Actinemys marmorata pallid</i>	Federal: None State: CSC	Permanent water	Absent; no aquatic habitats
Orange-throated Whiptail <i>Aspidoscelis hyperythra</i>	Federal: None State: CSC	Coastal sage scrub, chaparral	Low
Coastal Western Whiptail <i>Aspidoscelis tigris stejnegeri</i>	Federal: None State: None	Chaparral, coastal sage, low scrub, washes	Low
Northern Red Diamond Rattlesnake <i>Crotalus ruber ruber</i>	Federal: None State: CSC	Chaparral, coastal sage scrub, grasslands, woodlands	Very low
Coast (San Diego) Horned Lizard <i>Phrynosoma coronatum</i> (<i>blainvillii</i> population)	Federal: None State: CSC	Chaparral, coastal sage scrub, grasslands, woodlands	Low
Western Spadefoot <i>Spea hammondi</i>	Federal: None State: CSC	Vernal pools, puddles, ephemeral	Low
BIRDS			
Burrowing owl <i>Athene cunicularia</i>	Federal: None State: CSC	Open terrain	Occurs; active burrows off-site
California Horned Lark <i>Eremophila alpestris actia</i>	Federal: None State: None	Grasslands	High probability; possible nesting
Coastal California Gnatcatcher <i>Poliophtila californica californica</i>	Federal: FT State: CSC	Coastal sage scrub	Absent, no coastal sage scrub on site
Least Bell's vireo <i>Vireo bellii pusillus</i>	Federal: FE State: SE	Riparian woodland and scrub	Absent; no riparian habitat on site
MAMMALS			
American Badger <i>Taxidea taxus</i>	Federal: None State: CSC	Grassland, sparse coastal sage scrub (friable soils)	Absent
Coyote <i>Canis latrans</i>	Federal: None State: None	All native habitats, residential	Occurs; suitable den burrows just off site
Northwestern San Diego Pocket Mouse <i>Chaetodipus fallax fallax</i>	Federal: None State: CSC	Grassland, sparse coastal sage scrub	Low
San Diego Black-tailed Jackrabbit <i>Lepus californicus bennettii</i>	Federal: None State: None	Grassland, sparse coastal sage scrub	Moderate, suitable burrows just off site
Stephens' kangaroo rat <i>Dipodomys stephensi</i>	Federal: FE State: ST	Grassland, sparse coastal sage scrub	Site is in SKR Fee Area

Federal
FE – Federally Endangered
FT – Federally Threatened
FPT – Federally Proposed Threatened
FSC – Federal Species of Concern

State
SE – State Endangered
ST – State Threatened
CSC – California Species of Concern
CFP – California Fully-Protected Species

Stephen's Kangaroo Rat

The proposed site is included in the Stephen's Kangaroo Rat fee area.

Burrowing Owl

The project site is included in the MSHCP Burrowing Owl survey area. A 2006 habitat assessment for Burrowing Owls included a search for burrows suitable for the occupation by this fossorial species and an analysis of topographical features and vegetative structure that would indicate the possibility of Burrowing Owl occurrence. Transects were walked along all edges of the active sod farm; no burrows were found on this site.

At some time between 2006 and the present, the sod farm was allowed to go fallow, providing more areas (virtually the entire project site) where burrows could be present. Additionally, the larger project site provides more and better Burrowing Owl habitat, including proximity to the MWD channel to the north, which has burrows. On January 4, 2010, one Burrowing Owl was observed just off-site to the north.

Fairy Shrimp

Three species of fairy shrimp are considered sensitive and are covered by the MSHCP: riverside Fairy Shrimp (*Strptocephalus wootoni*), Santa Rosa Plateau Fairy Shrimp (*Linderiella santarosae*) and Vernal Pool Fairy Shrimp (*Brachinecta lynchi*). These species are associated with vernal pool habitats. The large off-site puddle filled by the mid January rains lacks vernal pool substrate but is still to be considered fairy shrimp habitat based on U.S. Fish and Wildlife Service definitions (USFWS 1996). This puddle is off-site but reaches the northwest boundary of the project site.

Related Regulations

Federal Endangered Species Act of 1973

The Federal Endangered Species Act of 1973 (ESA) (16 U.S.C. 1531-1543) and subsequent amendments provide for the conservation of endangered and threatened species and the habitats on which they depend. A federally endangered species is one that is facing extinction throughout all or a significant portion of its geographical range. A federally-threatened species is one likely to become endangered within the foreseeable future throughout all or a significant portion of its range. The presence of any federally threatened or endangered species on a site generally imposes severe constraints on development; particularly if development would result in a "take" of the species or its habitat. The term "take" means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, collect, or attempt to engage in such conduct. Harm in this sense can include any disturbance to habitats used by the species during any portion of its life history. The proposed project however, is not expected to require such authorizations as it is not expected to result in "take" of a listed species.

California Endangered Species Act

California Endangered Species Act (Fish and Game Code 2050, *et seq.*) (CESA) establishes that it is the policy of the state to conserve, protect, restore, and enhance threatened or endangered species and their habitats. CESA mandates that state agencies should not approve projects which would jeopardize the continued existence of threatened or endangered species if reasonable and prudent alternatives are available that would avoid jeopardy. CESA requires State lead agencies to consult with the California Department of Fish and Game (CDFG) during the CEQA process to avoid jeopardy to threatened or endangered species. CESA prohibits any person from taking or attempting to take a species listed as endangered or threatened (Fish and Game Code Section 2080). Section 2080 provides the permitting structure for CESA. The “take” of a state-listed Endangered or Threatened species or Candidate species will require incidental take permits as authorized by the CDFG. The proposed project however, is not expected to require such authorizations as it is not expected to result in “take” of a listed species.

Migratory Bird Treaty Act

The Federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code Sections 3503, 3503.5, and 3800 prohibit the take, possession, or destruction of any birds, their nests or eggs. Although no native habitat communities are present and the site is located in a predominately agricultural environment, certain common and special-status bird species, especially raptors, may utilize the site for breeding and/or seasonal foraging. The proposed project will be required to comply with the MTBA and California Fish and Game Code.

Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP)

The MSHCP serves as a comprehensive, multi-jurisdictional Habitat Conservation Plan (HCP), pursuant to Section (a)(1)(B) of the federal Endangered Species Act of 1973, as well as a Natural Communities Conservation Plan (NCCP) under the State NCCP Act of 2001. The plan “encompasses all unincorporated Riverside County land west of the crest of the San Jacinto Mountains to the Orange County line, as well as the jurisdictional areas of the cities of Temecula, Murrieta, Lake Elsinore, Canyon Lake, Norco, Corona, Riverside, Moreno Valley, Banning Beaumont, Calimesa, Perris, Hemet, and San Jacinto.” The overall biological goal of the MSHCP is to conserve covered species and their habitats, as well as maintain biological diversity and ecological processes while allowing for future economic growth within a rapidly urbanizing region.

Federal and state wildlife agencies approved permits required to implement the MSHCP on June 22, 2004. Implementation of the plan will conserve approximately 500,000 acres of habitat, including land already in public or quasi-public ownership and about 153,000 acres of land in private ownership that will be purchased or conserved through other means such as land acquisition, conservation easements, etc. The money for purchasing private land will come from development mitigation fees as well as state and federal funds.

The MSHCP includes a program for the collection of development mitigation fees, policies for the review of projects in areas where habitat must be conserved and policies for the protection of

riparian areas, vernal pools, and narrow endemic plants. It also includes a program for performing plant, bird, reptile, and mammal surveys as well as policies for the protection of these species if found.

The intent of the MSHCP is to ensure the survival of a range of plants and animals and avoid the cost and delays of mitigating biological impacts on a project-by-project basis. It would allow the incidental take (for development purposes) of currently listed species and their habitat from development. It would also allow the incidental take of species that might be listed in the future.

Stephens' Kangaroo Rat Habitat Conservation Plan

The project site also lies within the Fee Area Boundary of the Stephens' Kangaroo Rat Habitat Conservation Plan (HCP) for the Western Riverside County prepared by the Riverside County Habitat Conservation Authority (1996). Within this Fee Area, suitable habitat is assumed to be occupied and focused surveys are not required. Mitigation requirements of potentially significant impacts to the Stephens' kangaroo rat are satisfied through the mandatory payment of fees in accordance with the regulatory requirements of the U.S. Fish and Wildlife Service - approved HCP and City of Perris' Stephens' Kangaroo Rat mitigation fee ordinance (Ordinance No. 794, as amended).

City of Perris Ordinance No. 1123

The City of Perris adopted Ordinance No. 1123 to establish a local development mitigation fee for funding the preservation of natural ecosystems in accordance with the Western Riverside MSHCP.

Design Considerations

No design measures would be implemented that would avoid or reduce potentially significant impacts to biological resources.

Thresholds of Significance

The City of Perris has not adopted its own thresholds of significance and, instead, defers to the thresholds of significance identified in Appendix G of the CEQA Guidelines. Based on Appendix G of the CEQA Guidelines, impacts to biological resources may be considered potentially significant if the project would:

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

- have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
- conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Environmental Impacts Before Mitigation

Threshold: *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.*

The General Biological Habitat Assessment prepared by AMEC for the project site in June 2006 and updated in January 2010 revealed that the site consists mainly of leveled farmland which was formerly a sod farm. Recent discing of the former sod farm as well as the leased portion (2.60 acres) of the MWD parcel to the north indicates that the site is still considered agriculture. The site has been highly modified for human use and does not contain suitable habitat for any sensitive species.

A literature review was conducted, which included analysis of records from the California Natural Diversity Database (CNDDB) *RareFind 3*, the California Native Plant Society's (CNPS) *Rare and Endangered Vascular Plants of California*, the MSHCP, and the *Soil Survey of Western Riverside Area*. Pertinent documents from the AMEC library and files were also reviewed, and other AMEC biologists were consulted.

Based on the 2010 survey efforts, no protected plants or vegetative communities were found on the project site, nor were vernal pool species, as identified in Section 6.1.2 of the MSHCP (least Bell's vireo (*Vireo bellii pusillus*), southwestern willow flycatcher (*Empidonax traillii extimus*), western yellow-billed cuckoo (*Coccyzus americanus occidentalis*), Riverside fairy shrimp (*Streptocephalus wootoni*), Santa Rosa Plateau fairy shrimp (*Linderiella santarosae*), and vernal pool fairy shrimp (*Branchinecta lynchi*)) were found on-site. The few riparian plants present on-site are remnants of long-term agricultural activities, including ponding. Following the torrential rains of mid January 2010 a large puddle formed between the northwest corner of the project site and Webster Avenue. This puddle is not a vernal pool but is likely to persist for at least several days or a week or more. This puddle is considered fairy shrimp habitat, but surveys will not be necessary as it is off-site.

No native habitat communities are present and no listed plant or wildlife species (protected by the state or federal endangered species act) are expected to occur due to the absence of suitable habitat, except for the western Burrowing Owl. The project site is located within the MSHCP survey area for the western Burrowing Owl (*Athene cunicularia hypugaea*), federal and state Species of Special Concern. A general field survey and a Burrowing Owl habitat assessment were conducted by AMEC in the February 2006 habitat assessment. The habitat assessment for Burrowing Owls included a search for burrows suitable for occupation by this fossorial species,

and an analysis of topographical features and vegetative structure that would indicate the possibility of Burrowing Owl occurrence. Transects were walked along all edges of the sod farm; no burrows were found.

At some time between 2006 and the present, the sod farm was allowed to go fallow, providing more areas (virtually the entire project site) where burrows could be present. Additionally, the larger project site provides more and better Burrowing Owl habitat, including proximity to the MWD channel to the north, which has burrows. On 4 January 2010, during an AMEC reconnaissance visit to the MWD area, one Burrowing Owl was seen. A focused Burrowing Owl survey will be required during the breeding season prior to construction. Implementation of mitigation measure **MM Bio 1** is required to reduce potential impacts to Burrowing Owl to **less than significant impacts**.

Although the avian species that were directly observed on-site are not necessarily protected by state or federal/state endangered species acts, many are protected under the federal Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code which prohibits take, procession, or destruction of birds, their nests or eggs (in particular raptor species). If it is found that any of these species has subsequently established an active nest on the project site and that the nest would be lost as a result of site-preparation, it may be in conflict with these regulations. In order to avoid a violation of the MBTA or the California Fish and Game Code, general guidelines suggest that project-related disturbances at active nesting territories be reduced or eliminated during the nesting cycle (generally February 1 to August 31). Should eggs or fledglings be discovered on-site, the nest cannot be disturbed (pursuant to CDFG guidelines) until the young have hatched and fledged (matured to a state that they can leave the nest on their own). These guidelines are incorporated into mitigation measures **MM Bio 1** and **MM Bio 2**; therefore, compliance with mitigation measure **MM Bio 1** and **MM Bio 2** will reduce these potential impacts to below the level of significance.

The project site also lies within the Fee Area Boundary of the Stephens' Kangaroo Rat Habitat Conservation Plan (HCP) for the Western Riverside County prepared by the Riverside County Habitat Conservation Authority (1996). Within this Fee Area, suitable habitat is assumed to be occupied and focused surveys are not required. Mitigation requirements of potentially significant impacts to the Stephens' kangaroo rat are satisfied through the mandatory payment of fees in accordance with the regulatory requirements of the U.S. Fish and Wildlife Service - approved HCP and City of Perris' Stephens' Kangaroo Rat mitigation fee ordinance (Ordinance No. 794, as amended). The SKR HCP establishes a mechanism for the long-term conservation of the species. Potential impacts to the SKR are mitigated on a regional basis through compliance with the MSHCP and the SKR HCP. Compliance with mitigation measures **MM Bio 3** ensures the payment of fees. Therefore, the Project will not conflict with the SKR HCP and impacts are **less than significant**.

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

During the habitat assessment, no vernal pools, fairy shrimp, watercourses, or riparian habitat were present on the project site. No areas of the project site that would require a jurisdictional assessment.

There are no hydrological or soil indicators of wetlands, and the few riparian plants present on-site are remnants of long-term agricultural activities, including ponding. Following the torrential rains of mid January 2010 a large puddle formed between the northwest corner of the project site and Webster Avenue. This puddle is not a vernal pool but is likely to persist for at least several days or a week or more. This puddle is considered fairy shrimp habitat, but surveys will not be necessary as it is off-site.

In addition to not finding any features which may be considered jurisdictional or wetlands, the soils on the site are sandy loams. Sandy loams do not normally contain alkalinity, salinity, or high clay content associated with vernal pools, alkaline flats, or certain sensitive plants. The site does not contain any drainage features and does not contain resources that meet the definition of riparian/riverine areas, waters of the United States pursuant to Section 404 of the Clean Water Act, or streambeds pursuant to Section 1600 of the California Fish and Game Code.

Therefore, the proposed project will not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filing, hydrological interruption, or other means. Therefore, the project would have **no environmental impacts**.

Threshold: *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service.*

A habitat assessment and database review was conducted to document plants and vegetation communities present on the site. There were no special-status plant species, watercourses, or riparian habitat present on the project site. It was determined that the project site lacks native plant communities, and even weedy species are limited to the roadsides and margins of the property. Therefore, the proposed project will not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service and the project would have **no environmental impacts**.

Threshold: *Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.*

The Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) is a comprehensive, multi-jurisdictional Habitat Conservation Plan (HCP) focusing on conservation of species and associated habitats in Western Riverside County. The MSHCP will serve as a HCP pursuant to Section 10(a)(1)(B) of the federal Endangered Species Act of 1973, as amended, as well as a Natural Communities Conservation Plan (NCCP) under the NCCP Act of

2001. The MSHCP will result in an MSHCP Conservation Area in excess of 500,000 acres and focuses on conservation of 146 species.

On June 22, 2004, the U.S. Fish and Wildlife Service approved the Section 10(a)(1)(B) permit and a Natural Community Conservation Planning permit was issued by the California Department of Fish and Game. These permits provide take authorization for those species listed as threatened or endangered and identified in the permits as “Covered Species Adequately Conserved.” Take of habitat for bird species is also permitted. The County of Riverside is a participating entity and permittee of the Western Riverside County Multiple Species Habitat Conservation Plan.

The MSHCP establishes “Criteria Area” boundaries in order to facilitate the process by which properties are evaluated for inclusion in the MSHCP Conservation Area. The Criteria Area is an area significantly larger than what may be needed for inclusion in the MSHCP Conservation Area. Proposed projects within the Criteria Area are evaluated using MSHCP Conservation Criteria. The Criteria Area is an analytical tool which assists in determining which properties require conservation under the MSHCP. The closest criteria cell is more than one mile from the project site, on the opposite side of I-215, a six-lane freeway.

Pursuant to the provisions of the MSHCP, all discretionary development projects within the Criteria Area are to be reviewed for compliance with the “Property Owner Initiated Habitat Evaluation and Acquisition Negotiation Strategy” (HANS) process or equivalent process. The HANS process “ensures that an early determination will be made of what properties are needed for the MSHCP Conservation Area, that the owners of property needed for the MSHCP Conservation Area are compensated, and that owners of land not needed for the MSHCP Conservation Area shall receive Take Authorization of Covered Species Adequately Conserved through the Permits issues to the County and Cities pursuant to the MSHCP.” The project site is not within an identified Criteria Cell and will therefore not be required to follow the HANS process.

In accordance with the MSHCP, the proposed project was also reviewed for consistency with the MSHCP Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pool), Section 6.1.3 (Protection of Narrow Endemic Plant Species), Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlands Interface) and Section 6.3.2 (Additional Survey Needs and Procedures). The proposed project’s consistency with these MSHCP sections is discussed below.

Section 6.1.2 Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools

During the habitat assessment and survey for burrowing owls, no vernal pools, fairy shrimp, watercourses, or riparian habitat were present on the project site. Also, there are no areas of the project site that would require a jurisdictional assessment.

There are no hydrological or soil indicators of wetlands, and the few riparian plants present on-site are remnants of long-term agricultural activities, including ponding. Following the torrential

rains of mid January 2010 a large puddle formed between the northwest corner of the project site and Webster Avenue. This puddle is not a vernal pool but is likely to persist for at least several days or a week or more. This puddle is considered fairy shrimp habitat, but surveys will not be necessary as it is off-site.

In addition to not finding any features which may be considered jurisdictional or wetlands, there was no vegetation or features on the project site that met the specifics of Riparian/Riverine Areas pursuant to MSHCP Section 6.1.2. The site did not contain any drainage features. The site did not contain resources that meet the definition of riparian/riverine areas, waters of the United States pursuant to Section 404 of the Clean Water Act, or streambeds pursuant to Section 1600 of the California Fish and Game Code.

Therefore, the proposed project is in compliance with Section 6.1.2 of the MSHCP.

Section 6.1.3 Protection of Narrow Endemic Plant Species & Criteria Area Plant Species

Under Section 6.1.3, *Protection of Narrow Endemic Plant Species*, site-specific focused surveys for narrow endemic plant species shall be required where appropriate or suitable habitat is present within the Narrow Endemic Plant Species Survey Area. The proposed project site is located within Group 9 of the Narrow Endemic Plant Species Survey Area. Projects with the potential to affect Narrow Endemic Plant Species shall be subject to avoidance, minimization and mitigation strategies as outlined in Section 6.1.3 of the MSHCP. The project site does not fall within any survey areas identified on the Narrow Endemic Plant Species Survey Area Errata Map.

A habitat assessment and database review was conducted to document plants and vegetation communities present on the site. There were no special-status plant species considered under the MSHCP that occur on-site. Also, the project site did not fall within any survey areas identified on the Narrow Endemic Plant Species Survey Area Errata Map.

Therefore, the proposed project is in compliance with Section 6.1.3 of the MSHCP.

Section 6.1.4 Guidelines Pertaining to the Urban/Wildlands Interface

Section 6.1.4, *Guidelines Pertaining to the Urban/Wildlife Interface*, outlines the minimization of indirect effects associated with locating development in proximity to the MSHCP Conservation Area. To minimize these effects, guidelines in Section 6.1.4 of the MSHCP shall be implemented in conjunction with review of individual public and private development projects in proximity to the MSHCP Conservation Area, address the following: drainage, toxics, lighting, noise, invasive species, barriers, and grading/land development. The project site does not occur within any existing cores or linkages within the MSHCP Conservation Area and the closest criteria cell is more than one mile from the project site, on the opposite side of I-215, a six-lane freeway; therefore, the project will not have edge effects on any existing or future MSHCP conservation area.

Based on the location of the project site, there will be no edge effects to any existing or future conservation areas because the closest criteria cell is more than one mile from the project site, on the opposite side of I-215, a six-lane freeway.

Therefore, the proposed project is in compliance with Section 6.1.4 of the MSHCP.

Section 6.3.2 Additional Survey Needs and Procedures

The MSHCP also requires additional surveys for certain species if the project is located within the areas shown on Figure 6-2 (Criteria Area Species Survey Area), Figure 6-3 (Amphibian Species Survey Areas with Critical Area), Figure 6-4 (Burrowing Owl Survey Areas with Criteria Area), Figure 6-5 (Mammal Species Survey Areas with Criteria Area), and Figure 9-9 (Delhi Sands Flower-Loving Fly Suitable Habitat with Criteria Area) of the MSHCP. The project site is located outside of the Critical Area Species Survey Area (CASSA) for plants, and the survey areas for amphibians, mammals, and narrow endemic plant species. Therefore, habitat assessments and focused surveys for these species are not required.

The project site is located within the burrowing owl (*Athene cunicularia*) survey area as shown on Figure 6-4 of the MSHCP. According to the General Biological Resource Assessment, burrowing owls are expected to occur within the burrowing owl study area;

Pursuant to burrowing owl Objective 6 in Section B of the MSHCP Reference Document, a 30-day pre-construction presence/absence survey for burrowing owl is required where suitable habitat is present. If burrowing owls are present, they shall be relocated as agreed to by the City of Perris Planning Division and the California Department of Fish and Game. Implementation of mitigation measure **MM Bio 1** is required to reduce potential impacts to Burrowing Owl to less than significant; therefore, the project is consistent with the policies of MSHCP Section 6.3.2.

Stephens' Kangaroo Rat Habitat Conservation Plan

The project site also lies within the Fee Area Boundary of the Stephens' Kangaroo Rat Habitat Conservation Plan (HCP) for the Western Riverside County prepared by the Riverside County Habitat Conservation Authority (1996). Within this Fee Area, suitable habitat is assumed to be occupied and focused surveys are not required. Mitigation requirements of potentially significant impacts to the Stephens' kangaroo rat are satisfied through the mandatory payment of fees in accordance with the regulatory requirements of the U.S. Fish and Wildlife Service - approved HCP and City of Perris' Stephens' Kangaroo Rat mitigation fee ordinance (Ordinance No. 794, as amended).

Based upon the above analysis of consistency with all applicable sections of the MSHCP and the results of the focused biological surveys which evaluated the project site for potential biological impacts, and implementation of the below-listed mitigation measures for potential impacts to the burrowing owl, it is concluded that the proposed project is consistent with the applicable provisions of the adopted MSHCP. There are no other approved local, regional or state conservation plans applicable to the proposed project. Therefore the proposed project will not

conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan. Potential impacts to the SKR are mitigated on a regional basis through compliance with the MSHCP and the SKR HCP. Compliance with mitigation measure **MM Bio 3** ensures the payment of fees for the SKR HCP and the MSHCP. Therefore, the project impacts are **less than significant**.

Proposed Mitigation Measures

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (CEQA Guidelines, Section 15126.4). Mitigation measures were evaluated for their ability to eliminate or reduce the potential significant adverse impacts to special-status species and loss of foraging habitat. The following measures shall be implemented to eliminate or reduce potentially significant impacts to biological resources to below the level of significance.

MM Bio 1: A pre-construction survey for resident burrowing owls will be conducted by a qualified biologist no more than 30 days prior to commencement of grading and construction activities within those portions of the project site containing suitable burrowing owl habitat. The time lapse between surveys and site disturbance should not exceed 30 days. Additional surveys are necessary when the initial disturbance is followed by periods of inactivity or the development is phased spatially and/or temporally over the project site. Burrowing Owl surveys will be conducted in accordance with the methodologies prescribed by CDFG in their 1995 Staff Report on Burrowing Owl Mitigation and the Burrowing Owl Consortium in their 1993 Burrowing Owl Survey Protocol and Mitigation Guidelines.

If active nests are identified on-site during the pre-construction survey, they shall be avoided or the owls actively or passively relocated. To adequately avoid active nests, no grading or heavy equipment activity shall take place within at least 250 feet of an active nest during the breeding season (February 1 through August 31), and 160 feet during the non-breeding season.

If burrowing owls occupy the site and cannot be avoided, active or passive relocation shall be used to exclude owls from their burrows, as agreed to by the City of Perris Planning Department and the California Department of Fish and Game. Relocation shall be conducted outside the breeding season or once the young are able to leave the nest and fly. Passive relocation is the exclusion of owls from their burrows (outside the breeding season or once the young are able to leave the nest and fly) by installing one-way doors in burrow entrances. These one-way doors allow the owl to exit the burrow, but not enter it. These doors shall be left in place 48 hours to ensure owls have left the burrow. Artificial burrows shall be provided nearby. The project area shall be monitored daily for one week to confirm owl use of burrows before excavating burrows in the impact area. Burrows shall be excavated using hand tools and refilled to prevent reoccupation. Sections of flexible pipe shall be inserted into the tunnels during excavation to maintain an escape route for any animals inside the burrow. The CDFG shall be consulted prior to any active relocation to determine acceptable receiving sites available where this species has a greater chance of successful long-term relocation.

MM Bio 2: In order to avoid violation of the MBTA and California Fish and Game Code site-preparation activities (removal of trees and vegetation) shall be avoided, to the greatest extent possible, during the nesting season (generally February 1 to August 31) of potentially occurring native and migratory bird species.

If site-preparation activities are proposed during the nesting/breeding season (February 1 to August 31), a pre-activity field survey shall be conducted by a qualified biologist to determine if active nests of species protected by the Migratory Bird Treaty Act (MBTA) or the California Fish and Game Code are present in the construction zone. If active nests are not located within the project area and appropriate buffer, construction may be conducted during the nesting/breeding season. However, if active nests are located during the pre-activity field survey, no grading or heavy equipment activity shall take place within at least 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected (under MBTA or California Fish and Game Code) bird nests (non-listed), or within 100 feet of sensitive or protected songbird nests until the nest is no longer active.

MM Bio 3: The purpose of the MSHCP is to conserve open space and habitat on a county-wide, cumulative basis. Potential impacts to the SKR are mitigated on a regional basis through compliance the SKR HCP mitigation fees. To address the impacts associated with the cumulative loss of habitat for special status species, the proposed project shall be conditioned to pay the MSHCP mitigation fees as set forth under Ordinance No. 1123 and the City of Perris' Stephens' Kangaroo Rat mitigation fees as set forth under Ordinance No. 794.

Summary of Environmental Effects After Mitigation Measures Are Implemented

Based on the Biological Report (Appendix D), compliance with the MSHCP, and after the mitigation measure identified above are implemented, potential adverse impacts associated with biological resources will be reduced to a less than significant level.

4.5 CULTURAL RESOURCES

The focus of the following discussion is related to the proposed project's potential impacts to historical and archaeological resources, and unique paleontological resources or unique geological features; and the potential for the disturbance of any human remains, including those interred outside of formal cemeteries.

In addition to other reference documents, the following references were used in the preparation of this section of the DEIR:

- City of Perris, *City of Perris General Plan 2030, Conservation Element*, July 12, 2005. (Available at the City of Perris and on January 28, 2009 at [www.cityofperris.org/city-hall/general-plan/Conservation Element 01-08-09.pdf](http://www.cityofperris.org/city-hall/general-plan/Conservation%20Element%2001-08-09.pdf)).
- CRM TECH, *Paleontological Resources Assessment Report, Rados-Perris Distribution Center, Assessor's Parcel Number 303-050-002, In the City of Perris, Riverside County, California*, April 20, 2006. (Appendix E)
- CRM TECH, *Historical/Archaeological Resources Survey Report, Rados-Perris Distribution Center, Assessor's Parcel Number 303-050-002, In the City of Perris, Riverside County, California*, Revised January 15, 2010. (Appendix E)
- LOR Geotechnical Group, *Phase I Environmental Assessment, ±55.8 Acres NWC Indian Avenue and Rider Street, Perris, California*, December 23, 2002 (Appendix G)

Setting

Current Setting

The project area is located near the northern end of the Perris Valley, between the Lakeview Mountains and the Santa Ana-Elsinore Mountains. The surrounding area was formerly agricultural but is transitioning into predominantly industrial uses. The project site consists mainly of leveled farmland, part of which is still under cultivation as a sod farm. The project site lies adjacent to another tract of agriculture fields to its east, a restaurant to the west, and existing industrial complexes occupy the parcels to its north and south.

The terrain in the project area is relatively level, with a slight incline to the west and elevations ranging approximately from 1,470 to 1,490 feet above mean sea level. The eastern half of the project property is currently occupied by a sod farm, while the crops in the western half were recently harvested, leaving the soils exposed. The native vegetation has been removed in the project area. Adjacent properties feature tree tobacco, mustard, various grasses and weeds. Soils range from a compacted, light to medium brown silty clay to a loosely compacted, medium brown silty loam, and are virtually devoid of rock, pebble, or gravel. Small patches of decomposing sod were noted in the western half of the project area.

Paleontological Setting

Paleontological resources are those that result from the fossilization of animal bones, shells, casts, tracks, and the like. The Perris Valley floor is composed of Quaternary alluvium, which was developed as a result of erosion out of the batholith and minor Aeolian deposition. Near the surface, the materials near the project site are still too young to exhibit fossils. However, it is possible that at depths beyond five feet below the modern ground surface, fossils may be found. According to the City of Perris General Plan, the project area lies within an area of surface exposure of older Pleistocene valley deposits which have high potential to contain significant fossil resources.

Prehistoric Setting

It is widely acknowledged that human occupation in what is now the State of California began 8,000-12,000 years ago. In order to understand Native American cultures before European contact, archaeologists have devised chronological frameworks that endeavor to correlate the observable technological and cultural changes in the archaeological record to distinct periods. Unfortunately, none of these chronological frameworks has been widely accepted, and none has been developed specifically for the so-called Inland Empire region of southern California, the nearest ones being for the Colorado Desert and Peninsular Ranges area (Warren 1984) and for the Mojave Desert (Warren and Crabtree 1986).

The development of an overall chronological framework for the region is hindered by the lack of distinct stratigraphic layers of cultural sequences that could be dated by absolute dating methods. Since results from archaeological investigations in this region have yet to be synthesized into an overall chronological framework, most archaeologists tend to follow a chronology adapted from a scheme developed by William J. Wallace in 1955 and modified by others (Wallace 1955; 1978; Warren 1968; Chertkoff and Chertkoff 1984; Moratto 1984). Although the beginning and ending dates of the different horizons or periods may vary, the general framework of prehistory in this region under this chronology consists of the following four periods:

- Early Hunting Stage (ca. 10,000-6,000 B.C.), which was characterized by human reliance on big game animals, as evidenced by large, archaic-style projectile points and the relative lack of plant-processing artifacts;
- Millingstone Horizon (ca. 6,000 B.C.-A.D. 1,000), when plant foods and small game animals came to the forefront of subsistence strategies, and from which a large number of millingstones, especially heavily used, deep-basin metates, were left;
- Late Prehistoric Period (ca. A.D. 1,000-1,500), during which a more complex social organization, a more diversified subsistence base—as evidenced by smaller projectile points, expedient milling stones and, later, pottery—and regional cultures and tribal territories began to develop;
- Protohistoric Period (ca. A.D. 1,500-1,700s), which ushered in long-distance contact with Europeans and led to the historic period.

Ethnohistoric Setting

The Perris Valley has long been a part of the homeland of the Luiseño Indians, whose territory extended from present-day Riverside to Escondido and Oceanside. Luiseño history, as recorded in traditional songs, tells the creation story from the birth of the first people, the *kaamalam*, to the sickness, death, and cremation of *Wiyoot*, the most powerful and wise one, at Lake Elsinore.

Anthropologists have divided the Luiseño into several autonomous lineages or kin groups, which represented the basic political unit among most southern California Indians. According to Bean and Shipek (1978:551), each Luiseño lineage possessed a permanent base camp, or village, on the valley floor and another in the mountain regions for acorn collection. Luiseño villages were made up of family members and relatives, where chiefs of the village inherited their rank and each village owned its own land. Villages were usually located in sheltered canyons or near year-round sources of freshwater, always near subsistence resources.

The Luiseño exploited nearly all resources of the environment in a highly developed seasonal mobility system. The Luiseño people were primarily hunters and gatherers. They collected seeds, roots, wild berries, acorns, wild grapes, strawberries, wild onions, and prickly pear cacti, and hunted deer, elks, antelopes, rabbits, wood rats, and a variety of insects. Bows and arrows, atlatls or spear throwers, rabbit sticks, traps, nets, clubs, and slings were the main hunting tools. Each lineage had exclusive hunting and gathering rights in their procurement ranges. These boundaries were respected and only crossed with permission (Bean and Shipek 1978:551).

It is estimated that when Spanish colonization of Alta California began in 1769, the Luiseño had approximately 50 active villages with an average population of 200 each, although other estimates place the total Luiseño population at 4,000-5,000 (Bean and Shipek 1978:557). Some of the villages were forcefully moved to the Spanish missions, while others were largely left intact (*ibid.*:558). Ultimately, Luiseño population declined rapidly after European contact because of diseases such as small pox and harsh living conditions at the missions and, later, on the Mexican ranchos, where the Native people often worked as seasonal ranch hands.

After the American annexation of Alta California, the large number of non-Native settlers further eroded the foundation of the traditional Luiseño society. During the latter half of the 19th century, almost all of the remaining Luiseño villages were displaced, their occupants eventually removed to the various reservations. Today, the nearest Native American groups of Luiseño heritage live on the Soboba, Pechanga, and Pala Indian Reservations.

Archaeological Setting

Archaeological resources are those that are associated with prehistoric cultural sites, prehistoric isolates and the remnants of historic cultural sites that lack substantive building remnants such as roads and trails or consist of any man-made object or feature that is identified at ground level such as building foundations or below ground, such as wells, trash pits/mounds. In most cases, the resource is identified as a “ruin,” but may represent an intact deposit. A building may be a part of an archaeological site, but standing buildings or structures, in and of themselves, are not defined as archaeological. The City of Perris General Plan identifies an archaeological records

search at the Eastern Information Center, University of California-Riverside (EIC) for the City and sphere of influence area. This search indicated that about 80 percent of the acreage within the City has never been surveyed by an archaeologist or architectural historian. The City's record search did identify that nine prehistoric sites are located in the City of Perris, and most of the sites consist of milling slick sites. However, there are several sites exhibiting extensive pictographs (rock art), and a few small stone flake scatters. Ten historic archaeological sites occur in the City. These sites consist of the remnants of historic buildings and/or ranch complexes. Ninety-eight historic sites occur in the City limits, of which seven are located in the buffer zone. These consist of buildings or linear features more than forty-five years of age.

Historic Setting

In California, the so-called "historic period" began in 1769, when an expedition sent by the Spanish authorities in Mexico founded Mission San Diego, the first European outpost in Alta California. For several decades after that, Spanish colonization activities were largely confined to the coastal regions, and left little impact on the arid hinterland of the territory. Although the first explorers, including Pedro Fages and Juan Bautista de Anza, traveled through the Perris and San Jacinto Valleys as early as 1772-1774, no Europeans were known to have settled in the vicinity until the beginning of the 19th century.

During much of the Spanish and Mexican Periods in California history, the Perris and San Jacinto Valleys were nominally under the control of Mission San Luis Rey, which was established near present-day Oceanside in 1798. By 1821, it had become a part of the loosely defined Rancho San Jacinto, a vast cattle ranch for that mission (Gunther 1984:467). The rancho was headquartered on a small hill near the Lakeview Mountains, where an adobe house for the *mayordomo*, known in later years as Casa Loma, was built sometime before 1827 (*ibid.*:102).

In the 1840s, after secularization of the mission system, the Mexican government issued three large land grants on the former mission rancho of San Jacinto, resulting in the establishment of Rancho San Jacinto Viejo, Rancho San Jacinto Nuevo y Potrero, and El Sobrante de Rancho San Jacinto. As elsewhere in southern California, cattle raising was the most prevalent economic activity on these ranchos, until the influx of American settlers eventually brought an end to this much-romanticized lifestyle in the second half of the 19th century. The project area, however, was not included in any of these land grants, and thus remained unclaimed when Alta California was formally annexed by the United States in 1848.

In 1882-1883, the Perris Valley received a major boost in its early development when the California Southern Railway was constructed through the area, to be connected to the Santa Fe Railroad's Nationwide system a few years later. In a scenario repeated frequently in the American West, a string of towns soon emerged along the railroad line. The town of Perris was founded in 1886, and named in honor of Frederick Thomas Perris, the California Southern Railway's chief engineer and superintendent of construction. In 1893, with the creation of Riverside County, Perris was designated as one of the 12 original judicial townships. On May 16, 1911, Perris was incorporated as the sixth City in the county.

In 1883, the project area was initially considered part of the 50,000-acre Rancho San Jacinto Nuevo y Potrero, which was patented by Miguel, Helena, Isabel, and Maria Pedrorena (BLM n.d.). However, part of the patent which included the project area, was usurped 11 years by a 20,000-acre railroad land grant awarded to the Southern Pacific Railway Company (*ibid.*). Around the same time, a web of roads emerged in the project vicinity, including the forerunners of today's Rider Street, Webster Avenue, and Indian Avenue, which boarder the project area on the south, west, and east sides, respectively. Lined with scattered buildings, these roads attest to the gradual growth of the Perris Valley during the 1880s-1890s, when a typical rural settlement pattern took shape around the project location.

Despite the beginning of urban growth in surrounding communities such as Riverside and, to a lesser degree, Perris, the rural settlement pattern persisted in the project vicinity throughout the early and mid-20th century. Within the project area, an oval-shaped earthen berm was the only notable feature in the project area in 1939, of which apparently only the western half remained by 1951.

In an aerial photograph taken May 1, 1949, Rider Street is present to the south of the site as a small paved roadway. Webster Avenue is present to the west of the site as a small dirt road. An unlined drainage channel is present to the north of the site trending east-west from Webster Avenue to Indian Avenue. It does not extend west past Webster Avenue, however, east of Indian Avenue it is present for approximately 2,500 feet and then is not a channel, but is present as an easement through parcels. In the area of the site, the excavated materials are placed along the north and south of the channel however, none of these materials are on the site. Across Webster Avenue to the west, a small plot of unplowed land with numerous large trees is visible. The remainder of that parcel is recently plowed land; perhaps an old home site. The remaining surrounding parcels appear similar to the site. Several scattered residences are visible in the area. The nearest of which is located approximately 1,000 feet south of the site. A rectangular basin approximately 200 x 300 feet is located on the parcel to the north of the site, along the east side of Webster Avenue and does not appear to contain water. Highway 395 is visible west of the site as a small, paved highway lined with trees along the western edge, followed by a set of railroad tracks.

Aerial photographs taken in 1949 show a small shed present in the southwest corner of the project area, corresponding roughly in location to the small concrete structure observed during the field survey. This study was unable to ascertain whether it indeed represented the same building. This concrete structure is approximately 12.5 feet wide by 8 feet deep by 12.5 feet tall and approximately 1 foot thick with a raised concrete floor and steel door frame. A light bulb socket was noted in the ceiling and a steel pipe extended through the roof. This was most likely the avenue electricity was provided to the socket. A switch box was noted along the outside next to the steel door frame. The use of the structure is unclear.

In an aerial photograph taken January 28, 1962, the site and surrounding areas remain essentially the same except the rectangular basin to the north contains some water. In an aerial photograph taken May 24, 1974, the site remains essentially the same. However, Indian Avenue to the east now appears to be paved with power poles along its western edge. Highway 395 has been improved into a divided, four lane paved highway. The previously noted nearest residence to the

south of the site is gone. To the west of the site was the previously noted area believed to be an old home site. Just to the west of this area at the northeast corner of Highway 395 and Rider Avenue, the land contains three long rectangular structures, trailers perhaps, several very small square sheds and several parked cars. The use of the area is unclear. Across Highway 395 at the northwest corner of Rider Avenue and Highway 395 is a large building with four large silos and smaller building. This appears to be a grain processing facility. Two spurs of the railroad enter this facility from the tracks to the east along the western edge of Highway 395. To the east-southeast approximately 800 feet east along the south side of Rider, a large building surrounded on all four sides by paved parking areas, has been constructed. In addition, at the southeast corner of Rider Avenue and Perris Boulevard, a trailer park has been graded into level pads and paved interior streets.

In an aerial photograph taken April 10, 1980, the site has been sectioned into two distinct areas. The southwest quarter appears to be very recently plowed while the remaining three-quarters does not. In addition, numerous very small objects, bee hives perhaps, are scattered across the northern portion of the site. To the west of the site, across Webster Avenue, the old home site has been cleared of the majority of the trees and a large residence with a circular driveway along Rider Street has been built. Several small outbuildings are also present. The property just west of this appears to have been made a part of this new residence. Across Rider Avenue in this area, another residence has been built. The remaining surrounding areas remain essentially as described in the previous photographs.

In an aerial photograph taken February 4, 1984, the site appears as one single parcel again and the previously noted beehives are gone. Power poles are visible along the north side of Rider Avenue which bends slightly southward along the far eastern portion of the site. The basin to the north of the site is dry. The residence and other structures to the west across Webster Avenue appear to contain an abundance of debris associated with the long rectangular buildings/trailers. To the north of the site, Highway 395/Interstate 215 and Ramona Expressway are being improved with a bridge and off ramps. Two smaller buildings have been built, one to the west and one to the east of the previously noted large building with the parking lot to the east along the south side of Rider Avenue. The remaining surrounding areas remain essentially as described in previous photographs.

In an aerial photograph taken January 21, 1990, the site areas remain essentially as described in the previous photographs. The parcels to the north are somewhat overgrown. Across Rider Avenue to the southeast at the southeast corner of Rider Avenue and Indian Avenue, several other commercial buildings have been built. The previous are still visible with some trailers around them. Several other commercial buildings have been constructed in the surrounding region.

In an aerial photograph taken January 30, 1995, the site has been divided into an east and west half by digging a small unlined channel, perhaps for irrigation. Both halves appear to be recently plowed however, a rectangular basin with water is located in the southeast corner. To the south of this, across Rider Avenue, three structures have been built with paved access driveways. This appears to be a retail/office center. The majority of the previously noted debris and the rectangular structures on the property to the west across Webster Avenue are now gone. South

of the grain facility west of the highway, a large facility has been built. This facility contains one very large, square building, a smaller, triangular shaped building, with the remaining portions of the property containing what appears to be storage containers.

In an aerial photograph taken March 11, 2000, the site remains essentially as described in the previous photographs. The basin to the north is now faintly visible. Two circular tanks are visible on the circular driveway to the west across Webster Avenue. In addition, a small parking lot has been built between the residence and Webster Avenue, to the west, with access from Rider Avenue to the south. Just north of this, three rectangular trailers are visible. Across Rider Avenue to the south, a large building with a small paved parking lot has been built. The remaining area to the east of this is flat and contains numerous different types of heavy equipment such as dozers, front end loaders, etcetera. It appears this development of this property has resulted in the construction of an earthen berm along the north and east sides.

Related Regulations

The treatment of cultural resources is governed by federal, state, and local laws and guidelines. There are specific criteria for determining whether prehistoric and historic sites or objects are significant and/or protected by law. Federal and state significance criteria generally focus on the resource's integrity and uniqueness, its relationship to similar resources, and its potential to contribute important information to scholarly research. Some resources that do not meet federal significance criteria may be considered significant by state criteria. The laws and regulations seek to mitigate impacts on significant prehistoric or historic resources. The federal and state laws and guidelines for protecting historic resources are summarized below.

The National Historic Preservation Act of 1966 established the National Register of Historic Places (NRHP) as the official federal list of cultural resources that have been nominated by state offices for their historical significance at the local, state, or national level. Properties listed in the NRHP, or "determined eligible" for listing, must meet certain criteria for historical significance and possess integrity of form, location, and setting. Significance is determined by four aspects of American history or prehistory recognized by the NRHP Criteria:

- A. associated with events that have made a significant contribution to the broad patterns of our history;
- B. associated with the lives of persons significant in our past;
- C. embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; represent a significant and distinguishable entity whose components may lack individual distinction; and/or
- D. have yielded, or may be likely to yield, information important in prehistory or history.

Eligible properties meet at least one of the criteria and exhibit integrity. The integrity of the subject property is measured by the degree to which the resource retains its historical properties and conveys its historical character. Integrity also depends on the degree to which the original fabric has been retained, and the reversibility of changes to the property.

State law also protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources in CEQA documents. A cultural resource is an important historical resource if it meets any of the criteria found in Section 15064.5(a) of the CEQA guidelines. These criteria are nearly identical to those listed above for the NRHP. The California Register of Historic Resources (CRHR) is maintained by the State Historic Preservation Office (SHPO). Properties listed, or formally designated eligible for listing, on the NRHP are automatically listed on the CRHR, as are state Landmarks and Points of Interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code (PRC) or identified as significant in an historical resource survey meeting the requirements Section 5024.1(g) of the PRC, shall be presumed to be historically or culturally significant.

Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the CRHR criteria:

- A. associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- B. associated with the lives of persons important in our past;
- C. embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- D. has yielded, or may be likely to yield, information important in prehistory or history.

The fact that a resource is not listed in, or determined to be eligible for listing in the CRHR, not included in a local register of historical resources or identified in an historical resources survey does not preclude a lead agency from determining that the resource may be an historical resource.

The California Health and Safety Code §7050.5 states that if human remains are discovered on site, no further disturbance shall occur until the County Coroner has made a determination of origin and disposition. If the Coroner determines that the remains are not subject to his or her authority and if the Coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the NAHC. This regulation is applicable to any project where ground disturbance would occur.

California Senate Bill 297 (1982) addresses the disposition of Native American burials in archeological sites and protects such remains from disturbance, vandalism, or inadvertent

destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and establishes the NAHC to resolve disputes regarding the disposition of such remains. It has been incorporated into Section 15064.5(e) of the CEQA Guidelines.

City of Perris General Plan Policies

Conservation Element

Goal IV Protection of historical, archaeological, and paleontological sites.

Policy IV.A Comply with state and federal regulations and ensure preservation of the significant historical, archaeological and paleontological resources.

Measure IV.A.1 For all private and public projects involving new construction, substantial grading, or demolition, including infrastructure and other public service facilities, staff shall require appropriate surveys and necessary site investigations in conjunction with the earliest environmental document prepared for a project.

Measure IV.A.2 For all projects subject to CEQA, applicants will be required to submit results of an archaeological records search request through the Eastern Information Center (EIC), at the University of California, Riverside.

Measure IV.A.3 Require Phase I Surveys for all projects located in areas that have not previously been surveyed for archaeological or historic resources, or which lie near areas where archaeological and/or historic sites have been recorded.

Measure IV.A.4 In Area 1 and Area 2 shown on the Paleontological Sensitivity Map, paleontologic monitoring of all projects requiring subsurface excavations will be required once any excavation begins. In Areas 4 and 5, paleontologic monitoring will be required once subsurface excavations reach five feet in depth, with monitoring levels reduced if appropriate, at the discretion of a certified Project Paleontologist.

Measure IV.A.5 Identify and collect previous surveys of cultural resources. Evaluate such resource and consider preparation of a comprehensive Citywide inventory of cultural resources including both prehistoric sites and man-made resources.

Measure IV.A.6 Create an archive for the City wherein all surveys, collections, records and reports can be centrally located.

Design Considerations

No specific design measures will be implemented that would avoid or reduce significant impacts related to cultural resources.

Thresholds of Significance

The City of Perris has not adopted its own thresholds of significance and, instead, defers to the thresholds of significance identified in Appendix G of the CEQA Guidelines. Based on Appendix G of the CEQA Guidelines, impacts to cultural resources may be considered potentially significant if the project would:

- cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the CEQA Guidelines;
- cause a substantial adverse change in the significance of an archeological resource pursuant to Section 15064.5 of the CEQA Guidelines;
- directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; and/or
- disturb any human remains, including those interred outside formal cemeteries.

Environmental Impacts Before Mitigation

Threshold: *The project would cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the CEQA Guidelines.*

Historic background research for the project area was conducted by CRM TECH on the basis of published literature in local and regional history and historic maps. Record search results show that no cultural resources had been recorded on the property. Outside the project boundaries but within a one-mile radius, records show more than 20 previous studies covering various tracts of land and linear features. These and other similar studies resulted in the identification of ten (10) historical/archaeological sites.

All of the recorded sites in the surrounding area dated to the historic period, and no prehistoric, (Native American) sites were previously identified. The 10 recorded sites included four single-family residences constructed between 1889 and 1926 (Site No.'s 33-007628, 33-007640, 33-007641 and 33-33-007676), a former barracks building relocated from WWII-era Camp Haan (Site No. 33-007648), the Colorado River Adequate (Site No. 33-011265), and the former sites of the Perris Indian School (1892-1904) (Site No. 33-014109), the Val Verde School (1911-1960) (Site No. 33-007674), a pre-1939 residence (Site No. 33-008703), and a railroad dining car that was converted into a restaurant (Site No. 33-007623).

None of these previously recorded sites were located within or adjacent to the project area. The nearest one, the Colorado River Aqueduct, traverses just to the north of the project area in an underground tunnel. The alignment of the Aqueduct is not adjacent to the site, however, the

property itself, is adjacent to the site. Provided for by legislative act in 1927 and completed in 1939, the Colorado River Aqueduct was built by the Metropolitan Water District of Southern California. At 242-miles-long, it was the world's longest and largest water supply line at the time, and consisted of concrete-lined canals, conduits, siphons, and long tunnels, such as the Val Verde Tunnel near the project area. The aqueduct as a whole has been determined to be eligible for listing in the National Register of Historic Places.

Historical research suggests that the project area is relatively moderate in sensitivity for cultural resources from the historic period. As discussed above, three large land grants were made in the Perris and San Jacinto Valleys during the 1840s. The nearest among them, Rancho San Jacinto Nuevo y Potrero, extended to within a half-mile northeast of the project location. The project area itself was not included in any of these land grants, and thus remained unclaimed at the time of the U.S. annexation in 1848.

During the 1850s-1860s, an “emigrant trail” was noted running north-south across the western portion of the project site. Traces of the “emigrant trail” disappeared in the 1890s. This road eventually evolved into U.S. Highway 395 and, today, Interstate 215.

As late as 1951, the entire project area apparently remained vacant and undeveloped, except perhaps as agricultural fields. Recent discing of the site, a former sod farm, as well as the leased portion (2.60 acres) of the MWD parcel to the north indicates that the site is still considered agriculture.

During the field survey, no archaeological feature or artifact deposits, either prehistoric or historic in origin, were found within or adjacent to the project boundaries. The entire project area has been extensively disturbed in the past by the agricultural activities, including heavy equipment maneuvers, and no traces of native landscape remain on the property. Scattered refuse items were noted along the western project boundary, such as pieces of concrete, lumber, broken glass, and clumps of dried sod. None of these appears to be historical in origin.

A small concrete structure, occupying an approximately 8x8-foot area, was found in the southwest portion of the property. Utilitarian in design and function, this structure does not demonstrate any particular architectural or aesthetic merit, and there is no physical evidence suggesting that would relate it to the historic period. Although its exact age is unknown, the structure demonstrates no potential for historical significance under CEQA provisions. Therefore, it was not recorded as a potential historical resource.

No potential “historic resources” were previously recorded within the project area, and none were found during the present study. The only historical feature known to have been present within the project area, a wagon road noted in the 1850's-1860s, was abandoned at least by the 1990s and left no traces to be found today. Therefore the proposed project will not cause substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the CEQA Guidelines and impacts to historical resources are considered **less than significant**.

Threshold: *The project would cause a substantial adverse change in the significance of an archeological resource pursuant to Section 15064.5 of the CEQA Guidelines.*

The proposed project site is located in an area designated as “Low Density Site Probability” for archaeological resources in the City of Perris General Plan Conservation Element (Exhibit CN-6: Cultural Resource Sensitivity). This designation means that there is no more than one recorded cultural site per quarter mile. However, historical research suggests the project area may be considered moderate in sensitivity for cultural resources from the historic period as ten resources have been recorded within one mile of the site.

On March 2, 2006, archaeologist Nina Gallardo conducted a historical/archaeological resources records search at the EIC. During the records search, Ms. Gallardo examined maps and records on file at the EIC for previously identified cultural resources in or near the project area, and existing cultural resources reports pertaining to the vicinity. Previously identified cultural resources include properties designated as California Historical Landmarks, Points of Historical Interest, or Riverside County Landmarks, as well as those listed in the National Register of Historic Places, the California Register of Historical Resources, or the California Historical Recourse Information System.

Based on the results of the record search, 10 historical/archaeological sites were records near the project site. All of the recorded sites in the surrounding area dated to the historic period, and no prehistoric sites were previously identified. Additionally, none of the recorded sites were located within or adjacent to the project site.

On March 10, 2006, CRM TECH archaeologists John J. Eddy and Thomas J Melzer conducted a field survey of the project area. In the western half of the project area, where ground visibility was excellent, an intensive-level survey was carried. The eastern half of the project area was surveyed at a reconnaissance level from the parameter due to the presence of the sod farm and the resulting poor ground visibility. The entire project site area was surveyed systematically, as much as possible with the limitation of ground visibility, for any evidence of human activities dating to the prehistoric or historic periods.

The field survey produced negative results for potential cultural resources. The entire project area has been extensively disturbed in the past by agricultural activities, including heavy equipment maneuvers, and no traces of native landscape remain on the property today. Nevertheless, there still may be the potential to inadvertently uncover unknown buried archaeological resources. During project-related excavations, mitigation measure **MM Cultural 1**, listed below, will ensure the project’s potential to cause substantial adverse change in the significance of an archaeological resource as defined in section 15064.5 of the CEQA guidelines are mitigated to a less than significant level.

Threshold: *The project would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.*

A records search was conducted by the Regional Paleontological Locality Inventory of the San Bernardino County Museum in Redlands and the Natural History Museum of Los Angeles

County in Los Angeles. Both of these institutions maintain regional paleontological site records, as well as supporting maps and documents. The paleontology records searches indicated that no fossil localities have been found within the project area or within a one-mile radius of the project site. However, the searches indicated that older alluvium that has been known to contain Pleistocene fossils may be present at depth in the project area. The shallow Recent (Holocene) alluvium is given a low potential for significant nonrenewable paleontological remains, but should the older Pleistocene sediments be encountered, they are given a high potential for containing such remains.

In addition to the records searches, a literature search was conducted using materials in the CRM TECH library, including unpublished reports produced during surveys of other properties in the area. The onsite geology had been mapped and was defined as “Recent alluvial-fan, flood-plain, swamp, lake, and sand dune deposits” and “quaternary lake deposits and recent alluvium”. This is the same material that was mapped as the surface material in the Domenigoni Valley, the site of important recent vertebrate paleontological finds. However, most of those fossil remains were recovered from depths greater than ten feet below the present surface. These fossils were found because of the deep excavation required for a large reservoir project, which is much deeper than normally required for ordinary development projects.

On March 10, 2006, CRM TECH paleontological surveyors John J. Eddy and Thomas J. Melzer conducted a field survey of the project area. The entire project site was surveyed systematically, to determine geological formations and soil types, and for any indications of paleontological remains. Recent alluvium was noted on the surface of the property, with a large amount of decaying sod mixed into the soils. No paleontological remains were discovered during the survey.

Based on the results of the research procedures completed for the study area, the surface soils in the project area are all Recent (Holocene) alluvium. These soils have a low potential for containing important nonrenewable fossil remains. However, these younger alluvial sediments are known to rest directly atop older Pleistocene sediments in many areas, but usually at depths greater than ten feet; although some can be found as shallow as three feet near the base of the hills. According to the available information, the older sediments should be deeper than ten feet below the present surface, but could occur as shallow as five feet. Based on these results, it is recommended that full-time monitoring be required during the project if ground disturbance is to exceed five feet in depth, in order to determine if any older (Pleistocene) alluvium is impacted. Should any older alluvium be encountered, continuous monitoring will become necessary, along with a program to mitigate impacts to the paleontological resources that might be unearthed. In the event that construction/development activities uncover paleontological resources, the below-listed mitigation measure **MM Cultural 2** will reduce the project’s potential to directly or indirectly destroy a unique paleontological resource or site to a less than significant level.

Threshold: *The project would disturb any human remains, including those interred outside of formal cemeteries.*

The majority of the property has been disturbed by previous agricultural activities. There are no known formal cemeteries or informal family burial plots located on the project site. Therefore,

the project is not expected to disturb any human remains. Provisions of state law (CA Health & Safety Code Section 7050.5 and CA RPC Section 5097.98) outline the appropriate steps to be taken upon the discovery of human remains. If human remains are unearthed, construction is to stop immediately and the Riverside County Coroner's office is required to be notified immediately. No further disturbance shall occur until the County Coroner has made a determination of origin and disposition. If the Coroner determines that the remains are not subject to his or her authority and if the Coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, the Coroner will contact the Native American Heritage Commission (NAHC) within 24 hours. The NAHC would then resolve any disputes regarding the disposition of such remains. If the remains are Native American, the most likely descendant should be noted, as well as the potential for remains to be other than Native American. These regulatory requirements are applicable to the construction of the proposed project, and have been incorporated into mitigation measure **MM Cultural 3**. The impacts associated with the potential discovering of human remains during construction activities are considered to be **less than significant**.

Proposed Mitigation Measures

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (CEQA Guidelines, Section 15126.4). Mitigation measures were evaluated for their ability to eliminate to reduce the potential significant adverse impact upon cultural resources or to reduce impacts.

To further reduce impacts associated with archeological resources, the following mitigation measures shall be implemented:

MM Cultural 1: Prior to grading of the project site, the project developer shall hire a qualified archaeologist to provide cultural resource monitoring services at the project site. Selection of the archaeologist shall be subject to the approval of the City of Perris Planning Manager and no grading activities shall occur at the site until the archaeologist has been approved by the City. During grading activities, the archaeologist shall monitor earthmoving activities at the project site consistent with Public Resources Code Section 21083.2(b), (c), and (d). The archaeologist shall be equipped to record and salvage cultural resources that may be unearthed during grading activities. The archaeologist shall be empowered to temporarily halt or divert grading equipment to allow recording and removal of the unearthed resources. If the archaeologist identifies resources of a prehistoric or Native American origin, a Native American observer shall be added to the monitoring program and accompany the archaeologist for the duration of the grading phase. Any Native American resources shall be evaluated in accordance with the CEQA Guidelines and either reburied at the project site or curated at an accredited facility approved by the City of Perris. Once grading activities have ceased or the archaeologist determines that monitoring is no longer necessary, monitoring activities can be discontinued.

To further reduce impacts associated with paleontological resources, the following mitigation measure shall be implemented.

MM Cultural 2: Prior to the issuance of grading permits, a qualified paleontologist shall be retained to develop a paleontological resources monitoring and treatment plan (PRMTP) in accordance with the provisions of CEQA as well as the proposed guidelines of the Society of Vertebrate Paleontology, and shall include, but not be limited to the following.

1. The excavation of areas identified as likely to contain paleontological resources shall be monitored full-time by a qualified paleontological monitor. Monitoring should be restricted to undisturbed subsurface areas of older alluvium, which might be present below the surface. The monitor shall be prepared to quickly salvage fossils as they are unearthed to avoid construction delays. The monitor shall also remove samples of sediments which are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor shall have the power to temporarily halt or divert grading equipment to allow for removal of abundant or large specimens.
2. Collected samples of sediments shall be washed to recover small invertebrate and vertebrate fossils. Recovered specimens shall be prepared so that they can be identified and permanently preserved.
3. Specimens shall be identified and curated and placed into a repository (such as the Western Science Center or the Riverside Metropolitan Museum) with permanent curation and retrievable storage.
4. A report of findings, including an itemized inventory of recovered specimens, shall be prepared upon completion of the steps outlined above. The report shall include a discussion of the significance of all recovered specimens. The report and inventory, when submitted to the City of Perris Planning Division, will signify completion of the program to mitigate impacts to paleontologic resources.

MM Cultural 3: If human remains are uncovered at any time, all activities in the area of the find shall be halted by the developer or its contractor and the County Coroner shall be notified immediately pursuant to CA Health & Safety Code Section 7050.5 and CA PRC Section 5097.98. If the Coroner determines that the remains are of Native American origin, such as the Luiseno, Serrano or Cahuilla band of Indians, the Coroner shall proceed as directed in Section 15064.5(e) of the CEQA Guidelines.

Summary of Environmental Effects After Mitigation Measures Are Implemented

No unique geologic feature is known to exist on the project site and no fossils have been documented on the project site. However, as described above, the project site is underlain by deposits that are considered to have a high sensitivity for paleontological resources. Paleontological specimens taken from rock similar to that of the project area have, in the past, contributed to scientific understanding of the distant past and, therefore, could be considered unique resources. Consequently, ground-disturbing activities resulting from construction of the proposed project could damage or destroy previously undocumented unique fossils. However, mitigation measure (**MM Cultural 2**) requires monitoring of mass grading and outline specific measures that will be taken if any artifacts are unearthed during construction activities.

Implementation of this mitigation measure will reduce potentially significant impacts on paleontological resources to a less than significant level by ensuring that important scientific information that could be provided by these resources regarding prehistory is not lost.

4.6 GEOLOGY/SOILS

Potential impacts related to fault zones, ground-shaking risks, landslides, seiches, mudflows, volcanic hazards, slope instability, soil erosion, sediment deposition and wind erosion were all found to be less than significant in the Initial Study/NOP prepared for this project (Appendix A). The focus of the following discussion is related to the potential impacts from seismic-related ground failure, including liquefaction.

In addition to other reference documents, the following references were used in the preparation of this section of the EIR:

- City of Perris, *City of Perris General Plan 2030, Safety Element*, October 25, 2005. (Available at the City of Perris.)
- Eastern Municipal Water District, *West San Jacinto Groundwater Basin Management Plan 2007 Annual Report*, April 2006. (Available at www.emwd.org/news/pubs_sj-subbasin.html)
- LOR Geotechnical Group, Inc., *Preliminary Geotechnical Investigation, Project No. 11675.1*, January 14, 2003. (Appendix F)
- U. S. Department of Agriculture. Soil Conservation Service, *Soil Survey, Western Riverside Area, California*, November 1971. (Available at www.soils.usda.gov/survey/online_surveys/california/, accessed on January 28, 2009.)

Setting

Site Geology and Soils

The project site is located within the Perris Block within the Peninsular Ranges geomorphic province of southern California. Fault zones in this range are characterized by a northwest-southeast trending which separate elongated structural blocks. The nearest known active fault zones are the San Jacinto fault zone located approximately 8 miles to the northeast, the Elsinore fault zone located approximately 13 miles to the southwest, and the San Andreas fault zone located approximately 20 miles to the northeast.

The project site is underlain predominately by younger alluvium. The alluvium consisted primarily of silty sand and well graded sand with some sandy silt and poorly graded sand. According to the 1971 Soil Survey for Western Riverside County, there are three soils types within the project site (**Figure 4.6-1, Soils Map**). The soil types are: Pachappa fine sandy loam, Ramona Sandy loam and Greenfield sandy loam. These are a part of the Hanford-Tujunga-Greenfield association, which very deep and well drained to excessively drained.

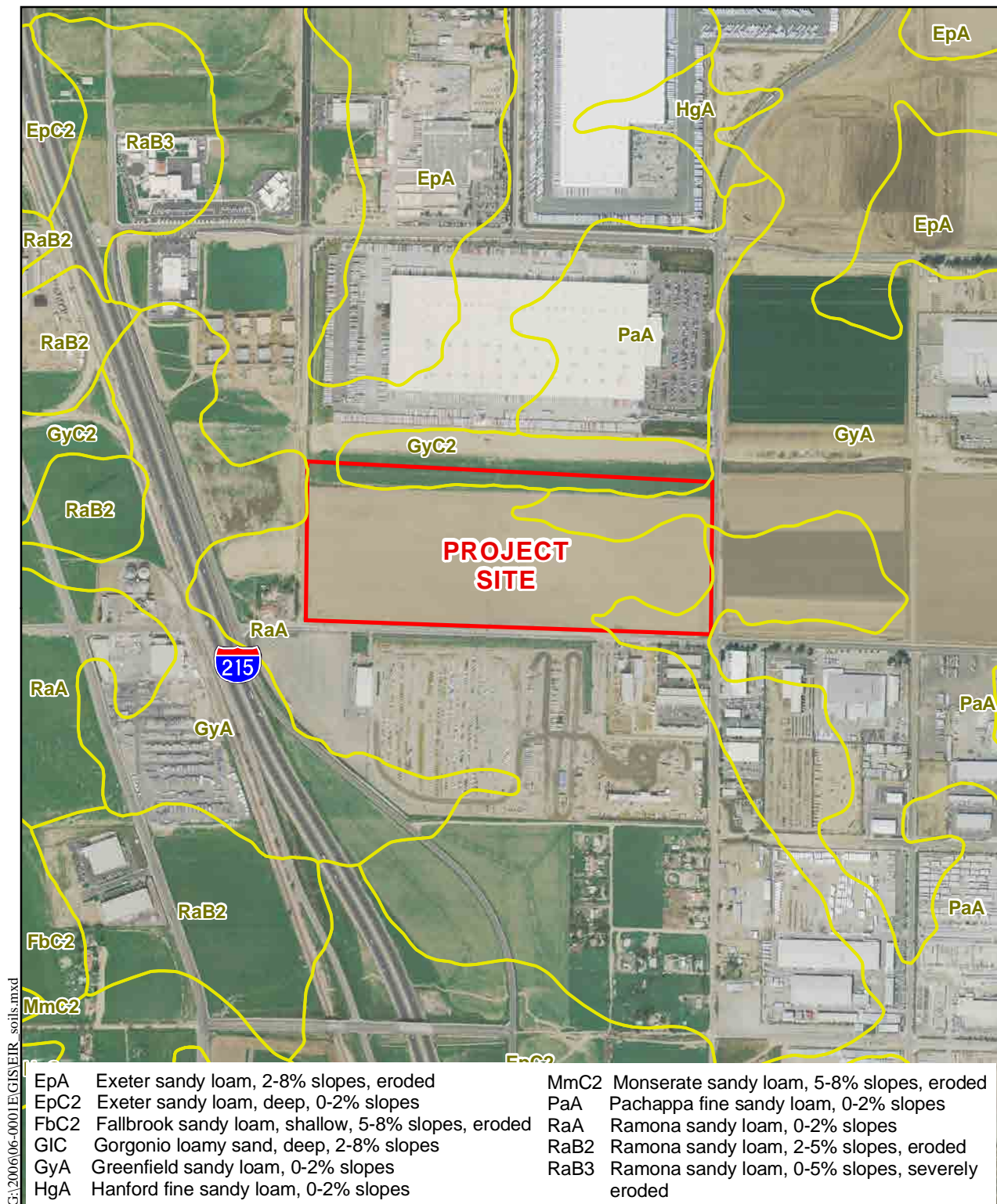


Figure 4.6-1
Soils Map

The Perris Block is underlain with rocks of the Peninsular Ranges batholiths. This contains a very large mass of crystalline igneous rocks of Cretaceous age and pre-batholithic metasedimentary and metavolcanic rocks of older ages.

Seismic Hazards

People and structures in the project area are subject to risks from hazards associated with earthquakes. Seismic activities pose two types of hazards: primary and secondary. Primary hazards include ground rupture, ground shaking, ground displacement, and subsidence. Secondary hazards include ground failure, liquefaction, water waves, movement on nearby faults, dam failure, and fires. Potential seismic hazards affecting the project site include ground liquefaction and subsidence.

The major geologic hazard associated with ground shaking is liquefaction and ground failure. Liquefaction occurs when ground shaking causes water saturated soils to become fluid and lose strength. Liquefaction occurs when three general conditions exist: 1) shallow groundwater (50 feet or less below ground level), 2) low-density silty or fine sandy soils, and 3) high intensity ground motion. Liquefaction hazards are particularly significant along watercourses.

Related Regulations

Uniform Building Code

The Uniform Building Code (UBC) is published by the International Conference of Building Officials. It forms the basis of about half the State building codes in the United States, including California's, and has been adopted by the State legislature together with Additions, Amendments, and Repeals to address the specific building conditions and structural requirements in California.

California Building Code

California Code of Regulations (CCR), Title 24, Part 2, the California Building Code (CBC), provides minimum standards for building design in the State, consistent with or more stringent than UBC requirements. Local codes are permitted to be more restrictive than Title 24, but are required to be no less restrictive. Chapter 16 of the CBC deals with General Design Requirements, including regulations governing seismically resistant construction (Chapter 16, Division IV) and construction to protect people and property from hazards associated with excavation cave-ins and falling debris or construction materials. Chapter 18 and A33 deal with site demolition, excavation, foundations, retaining walls, and grading, including requirements for seismically-resistant design, foundation investigation, stable cut and fill slopes, and drainage and erosion control. The project will comply with current State requirements regarding seismic design.

Seismic Hazards Mapping Act

California Geological Survey (CGS) provides guidance with regard to seismic hazards. Under CGS *Seismic Hazards Mapping Act*, seismic hazard zones are identified and mapped to assist

local governments in land use planning. The intent of this Act is to protect the public from the effects of strong ground shaking, liquefaction, landslides, ground failure, or other hazards caused by earthquakes. In addition, CGS Special Publication 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California, provides guidance for the evaluation and mitigation of earthquake-related hazards for projects within designated zones of required investigations.

City of Perris Ordinance No. 1230

The City of Perris Development Services Department provides technical expertise in reviewing and enforcing the Building, Mechanical, Plumbing, Electrical and Fire Codes established in City of Perris Ordinance No. 1230. These codes establish site-specific investigation requirements, construction standards, and inspection procedures to ensure that development does not pose a threat to the health, safety, and welfare of the public.

City of Perris General Plan

The following are applicable policies from the City of Perris General Plan related to damage due to seismic incidents:

I.E.1: Require geological and geotechnical investigations by State-licensed professionals, in areas with potential for earthquake-induced liquefaction, landsliding, other slope instability, or settlement as part of the environmental and development review process.

I.E.2: Require implementation of mitigation measures identified in such investigations mentioned above, prior to the issuance of grading and building permits.

I.E.3: Require engineered slopes to be designed to resist seismically induced failure, in accordance with state-of-the art engineering parameters and analytical methods.

I.E.4: Require cut and fill transition lots to be over-excavated, and require complete maximum variation of fill depths beneath structures, to mitigate the potential of seismically induced differential settlement.

I.E.5: Adopt and enforce the most current version of the California Building Code (CBC).

I.E.6: Reconstruction of structures intended for human occupancy that have been damaged or destroyed by failed slopes will be prohibited, unless a geological report prepared by a State licensed geologist shows that remedial measures will improve the unstable slope conditions sufficiently to make the site suitable for redevelopment.

I.E.7: Geotechnical studies will be required for all projects to determine the potential for damage from expansive soils, and to define appropriate mitigation measures to address the damage potential that is identified.

I.E.8: The City will modify the Liquefaction Susceptibility Map as new data is obtained. Modifications to the map shall be conducted by or under the direction of a professional geologist.

Design Considerations

Prior to grading, over-excavation and recompaction of the on-site soil, all existing structures and plant material shall be removed from the site. Precise grading requirements and quantities will be determined at the grading permit stage and shall comply with any requirements set forth by the City.

In order to reduce the potential for adverse differential settlement, the underlying subgrade soil shall be prepared in such a manner that a uniform response to the applied loads is achieved. The over-excavation, recompaction, fill placement, and compaction recommendations will be determined at the time of site plan project grading.

Thresholds of Significance

The City of Perris has not adopted its own thresholds of significance and, instead, defers to the thresholds of significance identified in Appendix G of the CEQA Guidelines. Based on Appendix G of the CEQA Guidelines, impacts related to geology and soils may be considered potentially significant if the proposed project would:

- expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking and seismic-related ground failure, including liquefaction.

Environmental Impacts Before Mitigation

Threshold: *Expose people or structures to potential substantial adverse effect, including the risk of loss, injury, or death involving strong seismic ground shaking and seismic-related ground failure, including liquefaction.*

According to the Safety Element of the City of Perris General Plan and the General Plan Environmental Impact Report the subject site is located within an area of moderately high potential of ground shaking. However, as indicated in the LOR Geotechnical Investigation, no active or potentially active faults are known to exist at the subject site. In addition, the subject site does not lie within a current State of California Fault Zone. The closest known active fault is the Casa Loma segment of the San Jacinto fault zone, located approximately 8 miles to the northeast. The site is located in southern California and, therefore, it is subject to strong seismic ground shaking by a nearby or distant strong earthquake. However, all structures proposed shall be designed and constructed to meet the recommendations made by the City of Perris inspectors and the current California Building Code (CBC) standards.

Liquefaction is a phenomenon in which loose, water saturated, granular soils temporarily behave similarly to a fluid when subjected to high intensity ground shaking. As stated above, liquefaction occurs when three general conditions exist: 1) shallow groundwater, 2) low-density silty or fine sandy soils, and 3) high intensity ground motion. According to the Safety Element of the City of Perris General Plan, the project site is located in an area with a moderate potential for liquefaction.

As indicated by the West San Jacinto Groundwater Basin Plan 2005 Annual Report, groundwater level data for the Perris North subbasin ranges from 1 to 228 feet below ground level. The Geotechnical Investigation prepared by LOR Geotechnical Group, determined that according to the Western Municipal Water District Cooperative Well Measured Program, groundwater was measured in December 2001 in the nearest known groundwater wells, approximately .6 miles to the south-southeast from the project site. Groundwater at these well sites lies at a depth of approximately 117 feet below surface. Groundwater is anticipated to lie approximately 140 feet beneath the ground surface at the subject site and is anticipated to flow to the south-southeast, following the regional topography. LOR Geotechnical Group also reported that no groundwater was encountered within any of their subsurface excavations at the project site to a maximum depth of approximately 51.5 feet below the existing ground.

Since groundwater was not encountered at a maximum depth of 51.5 feet below the existing ground and the site is underlain by relatively dense conditions. LOR Geotechnical Group found that there is no possibility of liquefaction at the project site.

Therefore, the project will not expose people or structures to potential adverse effects related to strong seismic ground shaking and seismic-related ground failure, including liquefaction. **Impacts are considered to be less than significant without any mitigation.**

Proposed Mitigation Measures

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (CEQA Guidelines, Section 15126.4). The project was found to have less than significant impacts related to geology and soils. Therefore, no further mitigation is required.

Summary of Environmental Effects After Mitigation Measures Are Implemented

With implementation of the project, impacts related to liquefaction are considered to be less than significant without any mitigation.

4.7 HAZARDS & HAZARDOUS MATERIALS

Potential impacts related to creating hazards to the public through routine transport, use or disposal of hazardous materials, through accidental release of hazardous materials into the environment, the interference with emergency response plans, and handling or emitting hazardous materials within one-quarter mile near an existing or proposed school were all found to be less than significant or no impact in the Initial Study/NOP prepared for this project (Appendix A). The focus of the following discussion is related to the potential impacts related to whether the project site is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and as a result would create a significant hazard to the public or the environment.

In addition to other documents, the following references were used in the preparation of this section of the DEIR:

- City of Perris, *City of Perris General Plan 2030*, July 12, 2005. (Available at the City of Perris and at <http://www.cityofperris.org/city-hall/general-plan.html>, accessed on December 9, 2008.)
- LOR Geotechnical Group Inc., *Phase I Environmental Site Assessment*, December 23, 2002. (Appendix G)
- LOR Geotechnical Group Inc., *Phase II Environmental Site Assessment*, March 31, 2009. (Appendix G)

Setting

The east side of the project site was previously used as a sod farm. The western half of the project site was utilized for crops which have since been harvested. A 12.5-foot wide by 8-foot deep by 12.5-foot tall concrete structure is located within the southwest portion of the site. Areas of trash and debris were located within the southwest, northwest, and central portions of the site. No significant soil staining or unusual odors were noted on the site or around the trash and debris. Additionally, there are no listed hazardous waste sites within a one-mile radius of the project site.

Historical photos show evidence of a possible homestead from 1949 to 1974, a new residence with outbuildings in 1980, a channel dividing the project site in 1995, and additional buildings in 2000. No evidence of releases of hazardous materials was present or observed onsite or on adjacent properties during a site visit, performed by LOR Geotechnical Group Inc. in December 2002.

Review of regulatory database information did not identify any known or suspected contamination sites (landfills, underground storage tanks, hazardous waste generators, etc.) in the area surrounding the property that would negatively impact the project site.

Related Regulations

A number of federal, state, and local laws have been enacted to regulate the management of hazardous materials. Implementation of these laws and management of hazardous materials are regulated independently of the CEQA process through programs administered by various agencies at the federal, state, and local levels. An overview of the key hazardous materials laws and regulations that apply to the proposed project are provided below.

Federal and state regulations govern the renovation and demolition of structures where materials containing lead and asbestos are present. These requirements include: Part 61, Subpart M of the Code of Federal Regulations (pertaining to asbestos) and lead exposure guidelines provided by the U.S. Department of Housing and Urban Development (HUD).

Federal

Several federal agencies regulate hazardous materials. These include the Environmental Protection Agency (EPA), the Occupational Safety and Health Administration (OSHA), and the Department of Transportation (DOT). Applicable federal regulations are contained primarily in Titles 10, 29, 40, and 49 of the Code of Federal Regulations (CFR). In particular, Title 49 of the CFR governs the manufacture of packaging and transport containers, packing and repacking, labeling, and the marking of hazardous materials transport. Some of the major federal laws and issue areas include the following statutes:

- Resource Conservation and Recovery Act (RCRA) – hazardous waste management
- Hazardous and Solid Waste Amendments Act (HSWA) – hazardous waste management
- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) – cleanup of contamination
- Superfund Amendments and Reauthorization Act (SARA) – cleanup of contamination
- Emergency Planning and Community Right-to-Know (SARA Title III)-business inventories and emergency response planning

The EPA is the primary federal agency responsible for the implementation and enforcement of hazardous materials regulations. In most cases, enforcement of environmental laws and regulations established at the federal level is delegated to state and local environmental regulatory agencies.

State

Primary state agencies with jurisdiction over hazardous chemical materials management are the Department of Toxic Substances Control (DTSC) and the Regional Water Quality Control Board (RWQCB). Other state agencies involved in hazardous materials management are the Department of Industrial Relations (State OSHA implementation), Office of Emergency Services (OES-California Accidental Release Prevention implementation), Department of Fish and Game (DFG), Air Resources Board (ARB), Caltrans, State Office of Environmental Health Hazard Assessment (OEHHA-Proposition 65 implementation) and the California Integrated Waste Management Board (CIWMB). The enforcement agencies for hazardous materials transportation

regulations are the California Highway Patrol (CHP) and Caltrans. Hazardous materials and waste transporters are responsible for complying with all applicable packaging, labeling, and shipping regulation.

Hazardous chemical and biohazardous materials management laws in California include the following statutes:

- *Hazardous Materials Management Act* – business plan reporting
- *Hazardous Waste Control Act* – hazardous waste management
- *Safe Drinking Water and Toxic Enforcement Act of 1986* (Prop 65) – releases of and exposure to carcinogenic chemicals
- *Hazardous Substances Act* – cleanup of contamination
- Hazardous Waste Management Planning and Facility Siting (*Tanner Act*)
- Hazardous Materials Storage and Emergency Response
- *California Medical Waste Management Act* – medical and biohazardous wastes

State regulations and agencies pertaining to hazardous materials management and worker safety which are applicable to the project are described below:

California Environmental Protection Agency

The California EPA (Cal/EPA) has broad jurisdiction over hazardous materials management in the state. Within Cal/EPA, the DTSC has primary regulatory responsibility for hazardous waste management and cleanup. Enforcement of regulations has been delegated to local jurisdictions that enter into agreements with DTSC for the generation, transport, and disposal of hazardous materials under the authority of the Hazardous Waste Control Law.

Along with the DTSC, the RWQCB is responsible for implementing regulations pertaining to management of soil and groundwater investigation and cleanup. RWQCB regulations are contained in Title 27 of the California Code of Regulations (CCR). Additional state regulations applicable to hazardous materials are contained in Title 22 of the CCR. Title 26 of the CCR is a compilation of those sections or titles of the CCR that are applicable to hazardous materials.

Investigation and Cleanup of Contaminated Sites

The oversight of hazardous materials release sites often involves several different agencies that may have overlapping authority and jurisdiction. The DTSC and RWQCB are the two primary state agencies responsible for issues pertaining to hazardous materials release sites. Air quality issues related to remediation and construction at contaminated sites are also subject to federal and state laws and regulations that are administered at the local level.

Investigation and remediation activities that would involve potential disturbance or release of hazardous materials must comply with applicable federal, state, and local hazardous materials laws and regulations. DTSC has developed standards for the investigation of sites where hazardous materials contamination has been identified or could exist based on current or past uses. The standards identify approaches to determine if a release of hazardous wastes/substances

exists at a site and delineates the general extent of contamination; estimates the potential threat to public health and/or the environment from the release, and provides an indicator of relative risk; determines if an expedited response action is required to reduce an existing or potential threat; and completes preliminary project scoping activities to determine data gaps and identifies possible remedial action strategies to form the basis for development of a site strategy.

Design Considerations

The proposed project does not contain specific design considerations related to potential risks due to hazards and hazardous materials.

Thresholds of Significance

The City of Perris has not adopted its own thresholds of significance and, instead, defers to the thresholds of significance identified in Appendix G of the CEQA Guidelines. Based on Appendix G of the CEQA Guidelines, impacts related to hazards and hazardous materials may be considered potentially significant if the proposed project would:

- 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.

Environmental Impacts Before Mitigation

Threshold: *The project would 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.*

According to the Phase I Environmental Site Assessment (ESA) performed on the project site in January 2002, an Environmental Data Resources (EDR) report was reviewed in order to identify any known or suspected contamination sites or incidents of hazardous waste storage or disposal which might have resulted in soil or groundwater contamination within a one-mile radius of the property. Among the databases searched and included in the report were National Priority List (NPL) (federal, tribal, and state-equivalent), proposed and delisted NPL, CORRACTS (RCRA facilities subject to corrective actions), hazardous waste sites identified for investigation or remediation, Compensation and Liability Information System (CERCLIS), State CERCLIS, Voluntary Cleanup Priority List (VCP), Brownfields Calsites, Leaking Underground Storage Tank incident reports (LUST), sites with engineering controls, former CERCLIS (NFRAP), Resource Conservation and Recovery Act (RCRA) and state hazardous waste generators, Solid Waste Landfill Facilities (SWLF), Underground Storage Tanks (USTs), Toxic Pits, Hazardous waste manifests (HAZNET), Facility Index System (FINDS), Small Quantity Generators (SQGs), Large Quantity Generators (LQGs), USTs, Historical UST Registered Database (HIST UST), RCRA violations, and Toxic Chemical Release Inventory (TRIS).

Sites listed on databases such as HAZNET, FINDS, SQGs, LQGs, USTs, HIST USTs, RCRA violations, and TRIS facilities are listed because they use or store hazardous materials but do not

show evidence of any accidental spills or releases of hazardous materials unless they appeared on an agency list of contaminated sites. Therefore, sites on these lists do not pose a significant hazard to the public or environment.

Within unincorporated Riverside County, the Riverside County Department of Environmental Health (RCDEH) generally acts as the lead enforcement agency for hazardous materials and underground storage tank compliance. If a tank has leaked and groundwater contamination is suspected, the Santa Ana Regional Water Quality Control Board (SARWQCB) generally becomes the lead agency in supervising contamination characterization and cleanup.

Files identify one Cortese site within one mile of the project site, an egg production facility, and a CHMIRS (California Hazardous Material Incident Reporting System) site within one mile of the site. According to LOR Geotechnical Group Inc., no sites identified in the EDR report have or may adversely impact the site.

A Phase II Environmental Site Assessment (ESA) was conducted during March 2009 in order to assess the potential environmental concern of past pesticide usage at the site. Discrete shallow soil samples were collected at the depth interval of 0 to 0.5 feet below-ground-surface (bgs) at seventeen locations across the site. All but one of the sample locations were randomly chosen across the site. The one non-random sample was obtained by the door of the small concrete structure located in the southwest corner of the site. The seventeen shallow soil samples were analyzed for organochlorine pesticides (OCPs) and arsenic. Concentrations of DDT were reported in four samples up to 0.0037 mg/kg, and concentrations of DDE were reported in 13 samples up to 0.013 mg/kg. Arsenic was reported in all seventeen samples below the reporting limit of 1.0 mg/kg. Based on the trace amounts of OCPs detected in 13 of the 17 samples, a second round of sampling was conducted which obtained deeper soil samples at a depth of 2.0-2.5 feet bgs at seven of the 13 locations where trace concentrations of OCPs were reported. The laboratory analytical results for these deeper samples were all non-detect for OCPs at six of the seven locations. One sample had a trace concentration of DDE reported at 0.0028 mg/kg (see Phase II ESA in Appendix G of this EIR for details).

All of the soil samples analyzed for OCPs and arsenic had concentrations well below the California Human Health Screening Levels (CHHSLs) for residential or commercial/industrial land use of 1.6 mg/kg and 6.3 mg/kg, respectively. According to LOR, the concentrations of arsenic in the shallow soil samples are consistent with expected background concentrations (0.6 to 11.0 mg/kg) in California. The California EPA generally does not require cleanup of soil to less than background levels and recognizes that natural background concentrations of arsenic in California are often well above the health-based, direct-exposure goals in soil of 0.07 mg/kg for residential land use or 0.24 mg/kg for commercial/industrial land use.

Therefore, based on the analytical results from the soil samples collected and analyzed during the Phase II ESA, unrestricted use of the subject site with respect to OCPs and arsenic is warranted. No further investigation of the site for the presence of OCPs and arsenic is deemed necessary.

Based on the findings of the Phase I ESA and Phase II ESA, and the fact that database results from local, state, and federal records, show there were no additional sites of potential concern identified on or near the project site, the impacts are considered **less than significant**.

Proposed Mitigation Measures

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (CEQA Guidelines, Section 15126.4). However, impacts associated with the proposed project in relationship to hazards and hazardous materials are considered to be less than significant without mitigation. Therefore, no mitigation measures are required.

Summary of Environmental Effects After Mitigation Measures Are Implemented

Impacts related to the creation of a significant hazard to the public or the environment through the upset and accidental conditions involving the release of hazardous materials, including those from sites compiled pursuant to Government Code Section 65962.5 are considered less than significant.

4.8 HYDROLOGY/WATER QUALITY

Potential impacts related to placement of housing within a 100-year flood hazard area; placement of structures within a 100-year flood zone which would impede or redirect flood flows; exposure of people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; and exposure of people or structures to inundation by seiche, tsunami, or mudflow were all found to be less than significant in the Initial Study/NOP prepared for this project (Appendix A).

The focus of the following discussion is related to the potential impacts that would result in violating any water quality standard or waste discharge requirement; depleting groundwater supplies or interfering with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level; creating or contributing runoff water which would exceed the capacity of existing storm water drainage systems, or provide substantial additional sources of polluted runoff; substantially degrading water quality; altering the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increasing the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; and altering the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site.

In response to the NOP, comment letters were received from the Riverside County Flood Control and Water Conservation District (RCFC&WCD) and the Metropolitan Water District of Southern California (MWD). The RCFC&WCD requested that the EIR identify any potential impact to Master Drainage Plan facilities and increased runoff or other drainage issues that may affect the Perris Valley Stormdrain Channel be addressed. MWD requested that the project evaluate and provide mitigation for any potential impacts to their facilities and rights-of-way. MWD also expressed concern that the project must not restrict any of their day-to-day operations and/or access to facilities. These comments and concerns are incorporated into this section of the EIR.

In addition to other reference documents, the following references were used in the preparation of this section of the DEIR:

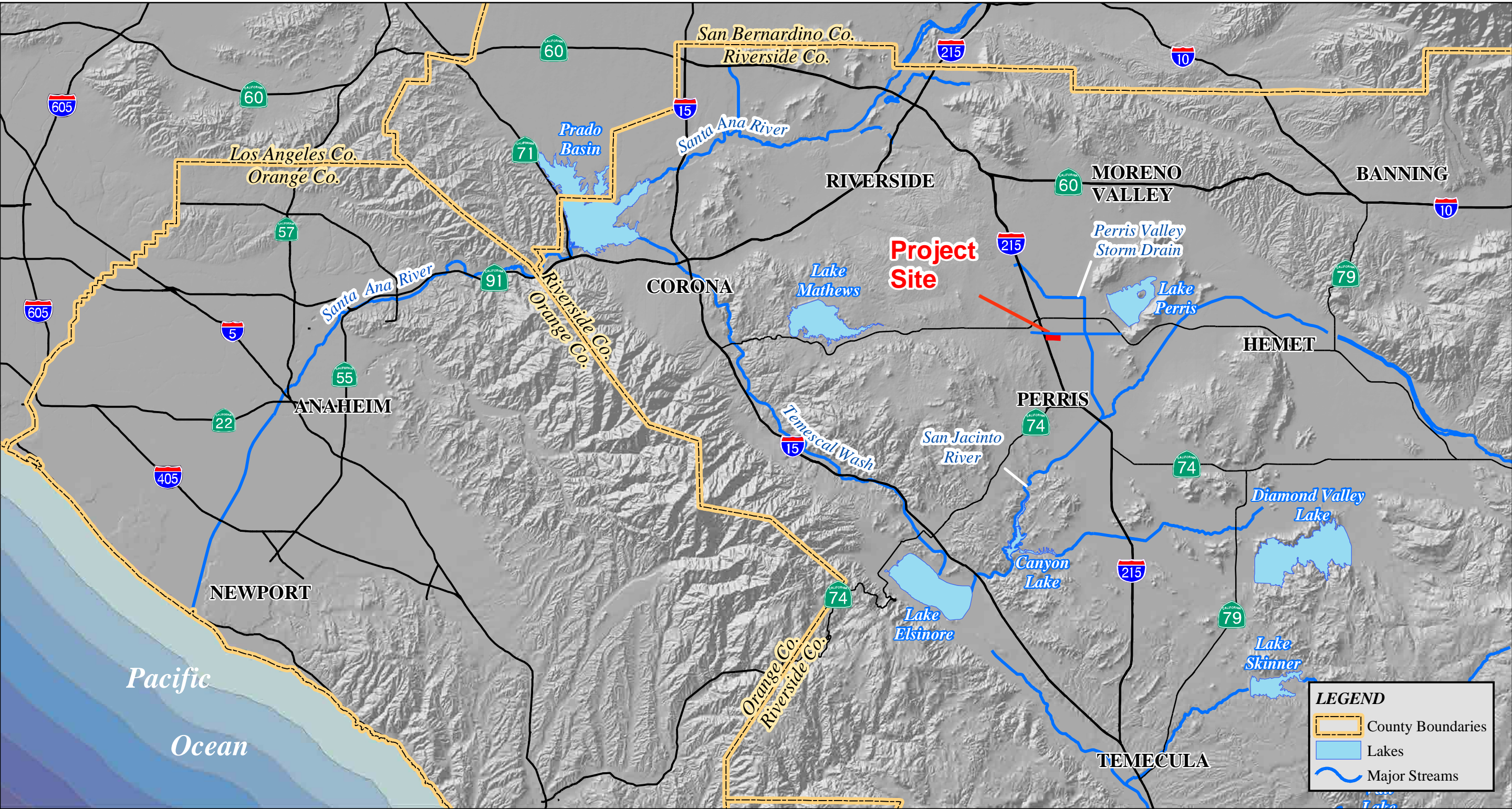
- Albert A. Webb Associates, *Water Quality Management Plan prepared for Rados Distribution Center – Perris*, July 18, 2008. (Appendix H)
- Albert A. Webb Associates, *Preliminary Hydrology Report for Rados Distribution Center – Perris*, July 30, 2008. (Appendix H)
- California Regional Water Quality Control Board, Santa Ana Region, *Nonpoint Source Program Strategy and Implementation Plan, 1998-2013 (PROSIP)*. (Available at the Santa Ana California Regional Water Quality Control Board and at www.swrcb.ca.gov/nps/protecting.html, accessed on January 19, 2009.)
- California Regional Water Quality Control Board, Santa Ana Region, *Water Quality Control Plan Santa Ana River Basin*, February 2008 update. (Available at

www.swrcb.ca.gov/rwqcb8/water_issues/programs/basin_plan/index.shtml, accessed on January 19, 2009.)

- Eastern Municipal Water District, *Eastern Municipal Water District Urban Water Management Plan*, 2005. (Available at Eastern Municipal Water District.)
- Eastern Municipal Water District, *West San Jacinto Groundwater Basin Management Plan, 2007 Annual Report*, June 2008. (Available on at www.emwd.org/news/publications.html, accessed January 19, 2009.)
- Eastern Municipal Water District, *Water Supply Assessment for the City of Perris Project (Development Plan Review Number 07-0119)*, June 4, 2008. (Appendix K)
- LOR Geotechnical Group, Inc., *Phase I Environmental Site Assessment, 55.8± Acres NWC of Indian Avenue and Rider Street, Perris, California*, December 23, 2002. (Available at the City of Perris.)
- Riverside County Flood Control and Water Conservation District, *Master Drainage Plan & Area Drainage Plan Reports*, July 1997 (revised June 1991). (Available at www.floodcontrol.co.riverside.ca.us/districtsite/default.asp, accessed on January 20, 2009.)
- Riverside County Flood Control and Water Conservation District, *Riverside County Water Quality Management Plan for Urban Runoff*, October 2006. (Available at www.floodcontrol.co.riverside.ca.us/downloads/NPDES/APP-O-RC-WQMP.pdf, accessed on January 20, 2009.)
- Riverside County Flood Control and Water Conservation District, *Supplement A to the Riverside County Drainage Area Management Plan): New Development Guidelines*, April 1996 (Available at www.floodcontrol.co.riverside.ca.us/districtsite/downloads/NPDES/Supplement_A.pdf, accessed on January 19, 2009.)

Setting

The project site is located on approximately 62 acres within the City of Perris in Riverside County, California. The project site consists of relatively flat, vacant farmland, ranging in elevation from 1,470 feet above sea level to 1,490 feet above sea level, sloping slightly toward the southeast. The project site has been heavily disturbed by activities associated with agriculture. As indicated in the Phase I Site Assessment (LOR Geotechnical Group, Inc.), the project site has been used for agricultural purposes as far back as 1949. Since then most of the project site has been used for sod farming. The sod farming operations no longer occur on the project site. The location of proposed project site and the site's proximity to surface waters in the region, are shown in **Figure 4.8-1, Santa Ana River Watershed**.



Sources: USGS 30m DEM; USGS
DLG Hydrography;

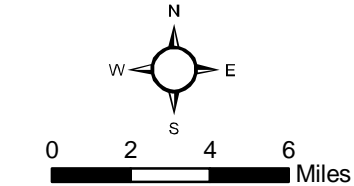


Figure 4.8-1
Santa Ana River Watershed

The project site is located within the San Jacinto River watershed, which is part of the larger Santa Ana River Watershed, and is under the jurisdiction of the Santa Ana Regional Water Quality Control Board (SARWQCB). **Figure 4.8-1**, shows the site location and its proximity to various surface water bodies. Storm water runoff from the project will enter the Lateral H-5 of the Perris Valley Area Drainage Plan (PVADP). The PVADP is tributary to Reach 3 of the San Jacinto River, which in turn is tributary Lake Elsinore. During times of especially heavy rainfalls or a series of wet winters in southern California, Lake Elsinore will overflow and spill down Temescal Creek toward the Santa Ana River.

The following discussion describes the proximity of the project to nearby water bodies, and provides background information on water quality issues related to surface and groundwater in the project area, in order to thoroughly evaluate the impacts of the project to local hydrology and water quality.

Surface Water Resources

The project site is located approximately 4 miles northwest of the San Jacinto River (**Figure 4.8-1, Santa Ana River Watershed**). The San Jacinto River is the main drainage feature in the San Jacinto watershed; it drains southwesterly from its headwaters at Lake Hemet toward Canyon Lake. The San Jacinto watershed is part of the larger Santa Ana River watershed.

Surface water quality may be impacted by both point source and non-point source (NPS) discharges of pollutants. Point source discharges are regulated through NPDES permitting. Non-point source pollution is now considered to be the leading cause of water quality impairments in the state, as well as the entire nation. Non-point source pollution is not as readily quantifiable as pollution that is derived from point sources, since it occurs through numerous diffuse sources. Rain water, snowmelt, or irrigation water can pick up and transport pollutants as it moves across land or paved surfaces, and these pollutants may ultimately be discharged into streams, lakes, oceans, and groundwater. Urban areas and agriculture are both considered to substantially contribute to non-point source pollution in surface waters. As rainfall or irrigation waters intercept pollutants in the landscape, these pollutants may be transported in contaminated runoff and enter streams, lakes, and oceans.

Potential pollutants from an industrial facility include; trash & debris and oil & grease, sediment/turbidity, nutrients, oxygen-demanding substances, pesticides (if landscaping or open area exists on the project site), organic compounds (specifically solvents), and metals. Since the proposed parking area is greater than 5,000 square feet, potential pollutants of concern include sediment/turbidity, nutrients, oxygen demanding substances, bacteria and viruses, pesticides, organic compounds (specifically petroleum hydrocarbons), trash, debris, oil and grease, and metals.

The Pollutants of Concern (POCs) for this project include bacteria and viruses (pathogens), organic compounds (PCBs), low dissolved oxygen, and nutrients. Since the receiving water bodies are impaired for pathogens and Poly-Chlorinated Biphenyls (organic compounds), treatment control best management practices (BMPs) with a medium or high effectiveness for

treating these pollutants as well as other pollutants generated at the site will be incorporated into the project design.

Groundwater Resources

The project is located within the service area of the Eastern Municipal Water District (EMWD), and the northern portion of EMWD's service area covers the San Jacinto River Watershed. The San Jacinto Watershed covers an area of approximately 728 square miles, measured above a point just downstream from Railroad Canyon Dam. The project site is located within the bounds of the West San Jacinto Groundwater Basin, specifically the North Perris subbasin. The West San Jacinto Groundwater Basin lies within alluvium-filled valleys carved into the elevated bedrock plateau of the Perris Block. The San Jacinto and Casa Loma fault zones are the major geologic features that bound and/or crosscut many of the groundwater basins in this region, and typically are effective barriers to groundwater flow.

Eight groundwater management zones have been delineated within the San Jacinto Groundwater Basin, the project site is within the Perris North Management Zone (PNMZ). The PNMZ is located north of the San Jacinto River, and is bound by the impermeable, crystalline bedrock outcrops that compose the surrounding mountains and hills, which provide effective hard rock barriers to groundwater flow. The PNMZ is managed by EMWD under the West San Jacinto Groundwater Management Plan, which provides for establishment of an advisory committee; prioritizes the sub-basins (including the PNMZ); and evaluation of groundwater resources including establishing groundwater quality, level, and extraction monitoring.

Storm Drain Facilities

The site is encompassed by the RCFC&WCD Area Drainage Plan (ADP) and Master Drainage Plan (MDP) for the Perris Valley region. According to the ADP, the project site is tributary to upstream terminus point of Lateral H-5, at the intersection of Rider Avenue and Indian Avenue. Lateral H-5 is not currently in place, as shown on the ADP.

The ADP also indicates a substantial amount of off-site area west of the Interstate 215 (I-215) reaching an existing 10 foot wide by 8 foot high reinforced concrete box (RCB) culvert taking the flows under the freeway and discharging to the east side. Per the ADP, 720 cubic feet (ft³) per sec reaches the RCB flows which are to be intercepted by Lateral H-12 which connects to Line H on Placentia Avenue. Lateral H-12 is not currently in place, and will not be constructed by the project. Therefore the existing off-site flows would continue east from the RCB under I-215 to Webster Avenue. A bulkhead with two 42" diameter openings is in place at the downstream terminus of the 10 foot wide by 8 foot high RCB thereby restricting the flows able to come out of the RCB.

Field inspection also discovered an earthen channel along the southern boundary north of Rider Street extending to the southeast corner of the property. Three 12" corrugated plastic pipes take the flows underneath Indian Avenue to continue the flows east along the north side of Rider Street. Silt, debris, and brush have built up in the channel as well as in the pipes. The pipes and channel would not have the capacity to mitigate major storm events, as a result, the runoff sheet flows along Rider Street and adjacent properties.

Related Regulations

Federal

Clean Water Act

The Clean Water Act (CWA) was designed to restore and maintain the chemical, physical, and biological integrity of the waters in the United States. The CWA also directs states to establish water quality standards for all waters of the United States and to review and update such standards on a triennial basis. Other provisions of the CWA related to basin planning include Section 208, which authorizes the preparation of waste treatment management plans, and Section 319, which mandates specific actions for the control of pollution from nonpoint sources. The EPA has delegated responsibility for implementation of portions of the CWA to the State Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards (RWQCBs), including water quality control planning and control programs, such as the National Pollutant Discharge Elimination System (NPDES) program. The NPDES program is a set of permits designed to implement the CWA that apply to various activities that generate pollutants with potential to impact water quality.

Section 303 of the CWA requires states to adopt water quality standards for all surface waters of the United States. Section 304(a) requires EPA to publish water quality criteria that accurately reflect the later scientific knowledge on the kind and extent of all effects on health and welfare that may be expected from the presence of pollutants in water. Where multiple uses exist, water quality standards must protect the most sensitive use. Water Quality standards are typically numeric, although narrative criteria based upon bio-monitoring methods may be employed where numerical standards cannot be established or where they are needed to supplement numerical standards. Section 303(c)(2)(b) of the CWA requires states to adopt numerical water quality standards for toxic pollutants for which EPA has published water quality criteria and which reasonably could be expected to interfere with designated uses of a water body.

NPDES Permit Program – Phase I

In November 1990, under Phase I of the urban runoff management strategy, the EPA published NPDES permit application requirements for municipal, industrial, and construction storm water discharges. The application requirements for municipalities were directed at municipalities which own and operate separate storm drain systems serving populations of 100,000 or more, or which contribute significant pollutants to waters of the United States, and required agencies to obtain coverage under municipal storm water NPDES permits.

Municipalities were required to develop and implement an urban runoff management program to address activities to reduce pollutants in urban runoff and storm water discharges that were contributing a substantial pollutant load to their systems. Rather than establishing numeric effluent limits, the EPA established narrative effluent limits for urban runoff, including the requirements to implement appropriate BMPs.

The Phase I regulations were also directed at certain facilities that discharged storm water associated with industrial activity, and construction activities that disturbed five or more acres.

NPDES Permit Program – Phase II

The Phase II Final Rule, published in the Federal Register on December 8, 1999, requires NPDES permits coverage for storm water discharges from:

- Certain regulated small municipal separate storm sewer systems (MS4s); and
- Construction activity disturbing between one and five acres of land (i.e., small construction activities).

In addition to expanding the NPDES Program, the Phase II Final Rule included minor revisions for certain industrial facilities. As with Phase I, the Phase II Program requires the development and Implementation of storm water management plans to reduce pollutant discharges.

State

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act authorizes the SWRCB to adopt, review, and revise policies for all waters of the state (including both surface and ground waters) and directs the RWQCB to develop regional Basin Plans. Section 13170 of the California Water Code also authorizes the SWRCB to adopt water quality control plans on its own initiative. The Water Quality Control Plan for the Santa Ana River Basin (8) is designed to preserve and enhance the quality of water resources in the Santa Ana Region for the benefit of present and future generations. The purpose of the plan is to designate beneficial uses of the region's surface and ground waters, designate water quality objectives for the reasonable protection of those uses, and establish an implementation plan to achieve the objectives.

All projects resulting in discharges, whether to land or water, are subject to Section 13263 of the California Water Code and are required to obtain approval of Waste Discharge Requirements (WDRs) from the RWQCBs. Land and groundwater related WDRs (i.e., non-NPDES WDRs) regulate discharges of process and wash-down wastewater and privately or publicly treated domestic wastewater. WDRs for discharges to surface waters also serve as NPDES permits.

National Pollution Discharge Elimination System (NPDES) Permits

In California, the SWRCB and its RWQCB's administer the NPDES permit program. The NPDES permits cover all construction and subsequent drainage improvements that disturb one acre or more, industrial activities, and municipal separate storm drain systems. Construction and industrial activities are typically regulated under statewide general permits that are issued by the SWRCB. The SWRCB also issued a statewide general small MS4 storm water NPDES permits for public agencies that fall under that Phase II NPDES regulations.

The NPDES permit system was established in the CWA to regulate both point source discharges (a municipal or industrial discharge at a specific location or pipe) and nonpoint source discharges (diffuse runoff of water from adjacent land uses) to surface waters of the United States. For point source discharges, each NPDES permit contains limits on allowable concentrations and mass emission of pollutants contained in the discharge. For nonpoint source discharges, the NPDES program establishes a comprehensive storm water quality program to manage urban storm water

and minimize pollution of the environment to the maximum extent practicable. The NPDES program consists of characterizing receiving water quality, identifying harmful constituents, targeting potential sources of pollutants, and implementing a comprehensive storm water management program.

The reduction of pollutants in urban storm water discharge to the maximum extent practicable through the use of structural and nonstructural BMPs is one of the primary objectives of the water quality regulations for MS4s. BMPs typically used to manage runoff water quality include controlling roadway and parking lot contaminants by installing filters with oil and grease absorbents at storm drain inlets, cleaning parking lots on a regular basis, incorporating peak-flow reduction and infiltration features (such as grass swales, infiltration trenches, and grass filter strips) into landscaping, and implementing education programs.

Industrial Storm Water Permits

Pursuant to Phase I of the NPDES Permit Program, storm water runoff from industrial facilities with certain Standard Industrial Classification (SIC) Codes is governed by the SWRCB under Water Quality Order 97-03-DWQ/NPDES Permit #CAS000001. These regulations prohibit discharges of polluted storm water unless the discharge is in compliance with the general NPDES permit requirements. The nine individual RWQCBs also enforce the General Industrial Storm Water Permit within their respective regions.

To receive coverage under the General Industrial Storm Water Permit, the owner or operator of an industrial facility must submit a Notice of Intent (NOI) to comply with the permit to the SWRCB, prepare a Storm Water Pollution Prevention Plan (SWPPP), and conduct monitoring and reporting. An industrial facility has the option to request an individual, site-specific NPDES permit instead of the general permit. RWQCBs however, typically only adopt individual permits when the facility has exceptional characteristics or poses a considerable threat to storm water.

Under the Federal Industrial Storm Water Permit, dischargers are required to control and eliminate sources of pollutants in storm water through the development and implementation of a SWPPP. The SWPPP is to be used as a tool for recognizing and evaluating potential sources of pollutants associated with industrial activities that may affect the quality of storm water discharges and authorized non-storm water discharges from the facility. The SWPPP is also used as a guide to help identify site-specific BMPs, which are to be implemented to reduce or prevent pollutants associated with industrial activities in storm water discharges and authorized non-storm water discharges.

Small MS4 Storm Water Permits

As part of Phase II of the NPDES permit program, the SWRCB adopted a General Permit for the Discharge of Storm water from Small MS4s. The main objectives of the Phase II regulations are to reduce the amount of pollutants being discharged to the maximum practical extent and protect the quality of the receiving waters. In order to meet this requirement, permittees are required to prepare a Stormwater Management Program to address the following six minimum control measures:

1. Public education and outreach;
2. Public participation/involvement;
3. Illicit discharge detection and elimination;
4. Construction site storm water runoff control for sites greater than one acre;
5. Post-construction storm water management in new development and redevelopment; and
6. Pollution prevention/good housekeeping for municipal operations.

These control measures are typically addressed through the development of BMPs.

Storm water runoff from construction activity that results in soil disturbances of at least one acre of total land area (and projects that meet other specific criteria) is governed by the SWRCB under Water Quality Order 99-08-DWQ. These regulations prohibit discharges of polluted storm water from construction projects that disturb one or more acres of soil unless the discharge is in compliance with the general NPDES permit requirements. The nine individual RWQCBs enforce the General Construction Storm water Permit for projects within their region.

The Santa Ana RWQCB administers the NPDES permit program regulating storm water from construction activities for projects greater than one acre in size. The main compliance requirement of the NPDES permits is the development and implementation of a SWPPP. The purpose of a SWPPP is to identify potential on-site pollutants, identify, and implement appropriate storm water pollution prevention measures to reduce or eliminate discharge of pollutants to surface water from storm water and non-storm water discharges.

Storm water BMPs to be implemented during construction and grading, as well as post-construction BMPs, will be outlined in the SWPPP prepared for each proposed project on the property, and will be consistent with Supplement A of the Riverside County Drainage Area Management Plan (DAMP), “Selection and Design of Storm water Quality Controls.” Examples include: detention basins for capture and containment of sediments, use of silt fencing, sandbags or straw bales to control runoff, and identification of emergency procedures in case of hazardous materials spills. The project proponent will be required to obtain a construction NPDES permit prior to site disturbance.

It is the responsibility of the construction site owner or landowner to obtain coverage under this General Permit prior to commencement of construction activities. To obtain coverage, the operator or owner must file an NOI with a vicinity map and the appropriate fee with the SWRCB. The General Permit outlines the requirements for preparation of a SWPPP.

Regional

Santa Ana River Basin Plan

The Water Quality Control Plan for the Santa Ana Basin (Basin Plan) sets forth water quality objectives for constituents that could potentially cause an adverse effect or impact on the beneficial uses of water. Specifically, the Basin Plan is designed to accomplish the following:

- Designate beneficial uses for surface and groundwater's;
- Set the narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the state's anti-degradation policy;
- Describe implementation programs to protect the beneficial uses of all waters within the region; and
- Describe surveillance and monitoring activities to evaluate the effectiveness of the Basin Plan.

The Basin Plan incorporates by reference all applicable SWRCB and RWQCB plans and policies.

Water Quality Management Plans are required to address the quality of storm water or urban runoff that flows from a developed site after construction is completed and the facilities or structures are occupied and/or operational. The project-specific Water Quality Management Plan (WQMP) describes the BMPs that will be implemented and maintained throughout the life of a project and is used by property owners, facility operators, tenants, facility employees, maintenance contractors, etc. to prevent and minimize water pollution that can be caused by storm water or urban runoff. Riverside County requires development projects to prepare and implement project-specific WQMPs as part of a federal and state regulatory program to reduce and eliminate water pollution caused by runoff flowing from storm water drainage systems into receiving waters on projects that disturb areas greater than one acre. A project-specific WQMP will be required as part of the project application for discretionary project approval for each project developed on the property. Final project-specific WQMPs must be approved prior to issuance of building and grading permits.

The project-specific WQMP has been developed to further address post-construction Urban Runoff from New Development and Significant Redevelopment projects under the jurisdiction of the Co-Permittees. The applicable municipal separate storm sewer system National Pollutant Discharge Elimination System permit (MS4 Permit) for the project is Order Number R8-2002-0011, NPDES No. CAS 618033 adopted by the Santa Ana Regional Water Quality Control Board on October 25, 2002 for the Santa Ana River region.

Implementation of the project-specific WQMP will occur through the review and approval by the Co-Permittee of a project-specific WQMP prepared by the project applicant. The project-specific WQMP will address management of Urban Runoff from a project site, represented by a map or permit for which discretionary approval is sought from a Co-Permittee. The primary objective of the WQMP, by addressing Site Design, Source Control, and Treatment Control BMPs applied on

a project-specific and/or sub-regional or regional basis, is to ensure that the land use approval and permitting process of each Co-Permittee will minimize the impact of Urban Runoff.

This WQMP will be implemented as follows: New Development and Significant Redevelopment projects submitted to the Co-Permittees after December 31, 2004 within the Santa Ana River Region shall be required to submit a project-specific WQMP prior to the first discretionary project approval or permit. A Co-Permittee may require a project-specific WQMP for projects submitted to them prior to December 31, 2004. Since some projects will be subject to discretionary approval during the planning phase (land use entitlement) and ministerial approval for subsequent grading or building permits, project applicants may be required to submit a preliminary project-specific WQMP for discretionary project approval (land use entitlement). Project applicants shall be required to submit for Co-Permittee review and approval, a final project-specific WQMP that is in substantial conformance with the preliminary project-specific WQMP prior to the issuance of any building or grading permit.

City of Perris General Plan Policies

Conservation Element

- Goal II** Conservation of areas with significant biotic communities.
- Policy II.A** Comply with state and federal regulations to ensure protection and preservation of significant biological resources.
- Measure II.A.3** For those public and private projects that are also subject to federal or state approval with respect to impacts to the waters of the U.S. and/or streambeds, require evidence of completion of the applicable federal permit process prior to the issuance of a grading permit.
- Goal V** An adequate water supply to support existing and future land uses, anticipated in the Land Use Element.
- Policy V.A** Coordinate land-planning efforts with local water purveyors.
- Measure V.A.1** Work with Eastern Municipal Water District to ensure that development does not outpace projections consistent with EMWD's Urban Water Management Plan.
- Measure V.A.2** Require use of new technologies and water conserving plant materials for landscaping.
- Goal VI** Achieve regional water quality objectives and protect the beneficial uses of the region's surface and groundwater.
- Policy VI.A** Comply with requirements of the National Pollutant Discharge Elimination System (NPDES).
- Measure VI.A.3** Prior to issuance of any grading permit involving a disturbance of one or more acres of land requires proof of a RWQCB San Jacinto Watershed Construction Activities Permit and a Storm Water Pollution Prevention Plan.

Measure VI.A.4 Review water quality impacts during the proposed project review and approval phases to ensure that appropriate BMPs are incorporated into the proposed project design and long-term operations.

Measure VI.A.5 In accordance with the Riverside County NPDES, enact a Water Quality Management Plan to review and regulate new development approvals.

Conservation Element - Sustainable Community Section

Goal I Create a vision for energy and resource conservation and the use of green building design for the City which provides for the protection of the environment while improving the quality of life and promoting sustainability.

Policy I.A Adopt and maintain development regulations, which encourage water and resource conservation.

Measure I.A.5 Use permeable paving materials within developments to deter water runoff and promote natural filtering of precipitation and irrigation waters.

Design Considerations

The project site will be graded and buildings designed to the recommendations of the Geotechnical Engineering Investigation.

Additionally, a preliminary project-specific WQMP has been prepared for the proposed project that outlines the types of pollutants which would be generated by the project, including those for which downstream receiving waters are impaired (Appendix H). The WQMP identifies BMPs to be implemented throughout the proposed project site. The proposed project includes site design, source control, and treatment control BMPs. Site design BMPs include approximately 6 acres (10 percent) of landscaping, planting of native and drought tolerant landscaping, and an extended basin to increase infiltration. Source control BMPs include but are not limited to: education of property owners, operators, tenants, occupants and employees; activity restrictions; irrigation system design and maintenance, common area liter control, and street and parking lot sweeping. Treatment control BMPs include an extended detention basin. The extended detention basin will be located on the eastern extent of the project site and treat stormwater to medium removal efficiency for the following pollutants of concern: sediment/turbidity, nutrients, trash and debris, oxygen demanding substances, oil and grease, and metals.

Thresholds of Significance

The City of Perris has not adopted its own thresholds of significance and, instead, defers to the thresholds of significance identified in Appendix G of the CEQA Guidelines. Based on Appendix G of the CEQA Guidelines, impacts to hydrology/water quality may be considered potentially significant if the project would:

- violate any water quality standards or waste discharge requirements.
- substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the groundwater table level.
- create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.
- substantially degrade water quality.
- substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.
- substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on or off site.

Environmental Impacts Before Mitigation

Threshold: *Violate any water quality standards or waste discharge requirements.*

The SARWQCB sets water quality standards for all ground and surface waters within its region. Water quality standards are defined under the Clean Water Act to include both the beneficial uses of specific water bodies and the levels of water quality that must be met and maintained to protect those uses (water quality objectives). Water quality standards for all ground and surface waters overseen by the SARWQCB are documented in the Basin Plan (2008). Beneficial uses consist of all the various ways that water can be used for the benefit of people and/or wildlife. Nineteen beneficial uses are recognized within the Santa Ana Region, of which nine beneficial uses have been designated for surface water bodies and groundwater in the vicinity of the project site (**Table 4.8-A, Beneficial Uses for Surface Water Bodies and Groundwater in Proximity to the Proposed Project**). All listed water quality objectives governing water quality in inland surface waters were evaluated for potential impacts from development of the proposed project; however, only those numeric and narrative water quality objectives that are most likely to be relevant to the proposed project are listed in **Table 4.8-B, Numeric Water Quality Objectives for Surface Water Bodies and Ground Water Bodies in Proximity to the Proposed Project**.

Water quality standards are attained when designated beneficial uses are achieved and water quality objectives are being met. The regulatory program of the SARWQCB is designed to minimize and control discharges to surface and groundwater within the region, largely through permitting, such that water quality standards are effectively attained.

Table 4.8-A, Beneficial Uses for Surface Water Bodies and Groundwater in Proximity to the Proposed Project

Water Body		Beneficial Uses
Perris North Groundwater Basin		MUN, AGR, IND, PROC
Reach 3 – Canyon Lake to Nuevo Road		MUN, AGR, GWR, REC1, REC2, WARM, WILD
Reach 2 – Canyon Lake		MUN, AGR, GWR, REC1, REC2, WARM, WILD
Reach 1 – Lake Elsinore to Canyon Lake		MUN, AGR, GWR, REC1, REC2, WARM, WILD
Lake Elsinore		REC1, REC2, WARM, WILD
Definitions		
AGR	Waters are used for farming, horticulture or ranching. Uses may include, but are not limited to, irrigation, stock watering, and support of vegetation for range grazing.	
GWR	Groundwater recharge waters, used for natural or artificial recharge of groundwater for purposes that may include future extraction, maintaining water quality, or halting saltwater intrusion in freshwater aquifers.	
MUN	Waters used for community, military, municipal or individual water supply systems. Uses may also include drinking water supply.	
IND	Waters for industrial service supply. These uses do not depend primarily upon water quality, and may include mining, cooling water supply, hydraulic conveyance, gravel washing, fire protection, and oil well re-pressurization.	
PROC	Waters for industrial process supply. Uses are for industrial activities that are dependent upon water quality. Uses may include process water supply and all uses of water related to product manufacture or food preparation.	
REC1	Water contact recreation waters, used for recreational activities involving body contact with water where ingestion of water is reasonably possible. Uses may include swimming, wading, water-skiing, skin and scuba diving, surfing, whitewater activities, fishing, and use of natural hot springs.	
REC2	Non-contact water recreation waters, used for recreational activities involving proximity to water, but not normally involving body contact with water where ingestion of water would be reasonably possible. These uses may include picnicking, sunbathing, hiking, beachcombing, camping, boating, sightseeing, and aesthetic enjoyment in conjunction of the above activities.	
WARM	Warm freshwater habitat waters support warm water ecosystems that may include preservation and enhancement of aquatic habitats, vegetation, fish and wildlife, including invertebrates.	
WILD	Wildlife habitat waters support wildlife habitats that may include the preservation and enhancement of vegetation and prey species used by waterfowl and other wildlife.	
RARE	Rare, threatened or endangered species waters support habitats necessary for the survival and successful maintenance of plant or animal species designated under the state or federal law as rare, threatened or endangered.	

Source: http://www.swrcb.ca.gov/rwqcb8/water_issues/programs/basin_plan/docs/chapter3.pdf, Table 3-1

Table 4.8-B, Numeric Water Quality Objectives for Surface and Ground Water Bodies in Proximity to the Proposed Project

Water Body	Water Quality Objectives (mg/L)						
	TDS (Total Dissolved Solids)	Hardness (as CaCO ₃)	Na (Sodium)	Cl (Chloride)	TIN (Total Inorganic Nitrogen)	SO ₄ (Sulfate)	COD (Chemical Oxygen Demand)
Perris North Groundwater Basin	570	*	*	*	5.2	*	*
Reach 3 – Canyon Lake to Nuevo Road	820	400	*	250	6	*	15
Canyon Lake (Reach 2 - San Jacinto River)	700	325	100	90	8	290	*
Reach 1 – Lake Elsinore to Canyon Lake	450	250	50	65	3	60	15
Lake Elsinore	2000	*	*	*	1.5	*	*

Source: http://www.swrcb.ca.gov/rwqcb8/water_issues/programs/basin_plan/docs/chapter4.pdf, Table 4-1

The proposed project may have potential negative effects on water quality. Development of the site will increase the amount of impervious surfaces, thereby reducing the amount of rain water that would be subject to infiltration. Implementation of the project will add impervious surfaces to an estimated 90 percent (56 acres) of the approximately 62 acre site. By increasing the percentage of impervious surfaces on the site, less water will percolate into the ground and more surface runoff will be generated. Paved areas and streets will collect dust, soil and other impurities that will then be assimilated into surface runoff during rainfall events. Pollutants such as trash and debris, oil and grease, sediment/turbidity, nutrients, oxygen demanding substances, organic compounds, pathogens, pesticides, and metals can be expected to be present in surface water runoff once project development occurs. In order to reduce the runoff potential on-site, approximately 6 acres of the site are planned for vegetated landscaping. The landscape design will minimize the use of impervious surfaces. It will focus on planting of drought tolerant vegetation appropriate for the local climate.

The project proponent is required to obtain coverage under the appropriate NPDES General Construction permit for Storm Water Discharges Associated with Construction Activities, Order No. 99-08-DWQ, NPDES No. CAS000002 prior to obtaining the grading permit. Best Management Practices typically identified in SWPPPs protect downstream areas from sediment and other pollutants during site grading and construction include:

- Proper storage, use, and disposal of construction materials.
- Removal of sediment from surface runoff before it leaves the site by silt fences or other similar devices around the site perimeter.
- Protection of storm drain inlets on site or downstream of the construction site to eliminate entry of sediment.
- Stabilization of cleared or graded slopes.
- Removal of sediment tracked or otherwise transported onto adjacent roadways through periodic street sweeping.
- Prevention of tracking soil off site through use of a gravel strip or wash facilities at exit areas or equivalent measures.
- Protection or stabilization of stockpiled soils.

The project proponent is required to develop and implement a Final project-specific WQMP. The RCFC & WCD must review and approve the Final project-specific WQMP and ensure that it gets implemented. The Final project specific WQMP is required to contain measures that will effectively treat all pollutants of concern and hydrologic conditions of concern, which are consistent with the approved WQMP, developed in compliance with their MS4 permit.

To achieve the stated goals, a preliminary project-specific WQMP has been prepared for the proposed project to identify BMPs to be implemented throughout the proposed project site (Appendix H). The proposed project includes site design, source control, and treatment control BMPs. Site design BMPs include approximately 6 acres (10 percent) of landscaping, planting of native and drought tolerant landscaping, and an extended basin to increase infiltration. Source control BMPs include but are not limited to: education of property owners, operators, tenants, occupants and employees; activity restrictions; irrigation system design and maintenance, common area litter control, and street and parking lot sweeping. Treatment control BMPs include an extended detention basin (**Figure 4.8-2, Stormwater Facilities**).

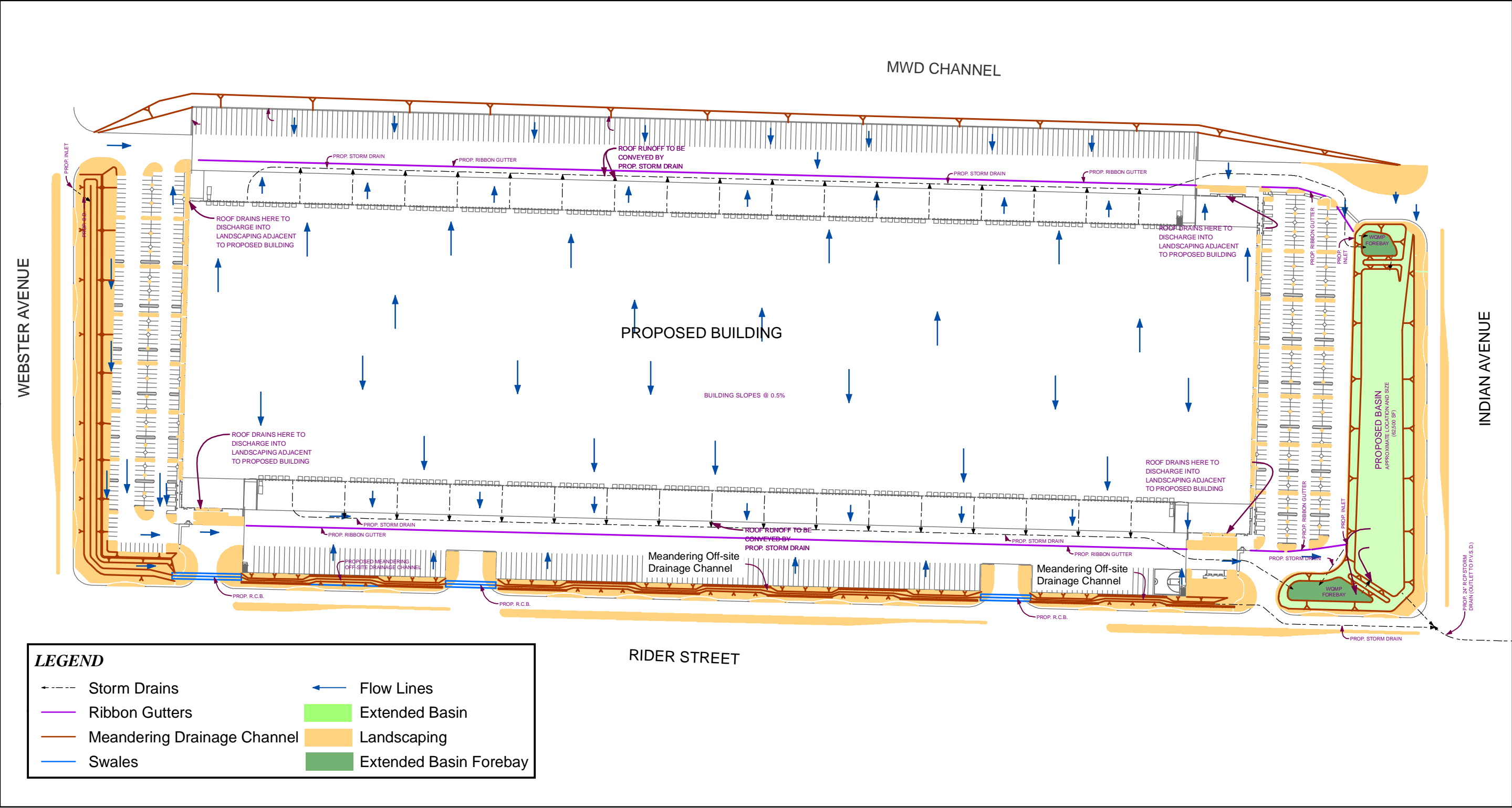


Figure 4.8-2
Stormwater Facilities

As identified in **Figure 4.8-2**, an extended detention basin is located on the eastern extent of the project site. The extended detention basin will treat stormwater to medium removal efficiency for the following pollutants of concern: sediment/turbidity, nutrients, trash and debris, oxygen demanding substances, oil and grease, and metals.

In order to minimize on-site runoff and reduce the overall stormwater flow volumes, 100 percent of the pervious areas (approximately 6 acres) of the project site will be vegetated with native drought tolerant landscaping. The landscaped areas are planned to be located on the west, south and east of the project site, between the parking areas and the surrounding project roadways (see **Figure 4.8-2**). Project roof runoff will be directed to the extended detention basin through underground stormdrain pipelines. Parking lot runoff will be conveyed directly to the regional Perris Valley Stormdrain Channel.

Through incorporation of these on-site water quality and flow facilities, the project will comply with County water quality requirements, which will help to reduce the discharge of expected POCs, and reduce the post-development flow rates into receiving waters. Through compliance with the NPDES General Construction Permit for Storm Water Discharges Associated with Construction Activities, Order No. 99-08-DWQ, NPDES No. CAS000002, and implementation of the Riverside County WQMP, impacts to water quality are anticipated to be **less than significant**.

Threshold: *Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.*

Eastern Municipal Water District is the provider of domestic water to the project area. According to EMWD, approximately twenty percent of EMWD's potable water demand is supplied by EMWD groundwater wells and the remainder is supplied by imported water from Metropolitan Water District through its Colorado River Aqueduct and its connections to the State Water Project. The majority of the groundwater produced by EMWD comes from its wells in the Hemet and San Jacinto area. The proposed project does not include groundwater extraction wells and domestic water to serve the project is expected to come from MWD and not from local groundwater sources.

The proposed project is expected to have a demand of 65 acre-feet per year, which is only 0.025% of EMWD's anticipated water demand for 2030. As indicated in the Water Supply Assessment prepared for the project and discussed in Section 4.14 (Water and Sewer) of this document, EMWD will have sufficient supplies in normal, dry, and multiple dry years to satisfy projected demands within its service area, including the proposed project.

Related to ground water recharge, the project site is located within EMWD's Perris North groundwater subbasin. The proposed project will reduce the area of pervious surface on the project site by approximately 90 percent, thereby decreasing the potential for groundwater recharge. As indicated in the WQMP prepared for the project, the project proposes approximately 10 percent (or 6 acres) of the site to be landscaped with native drought tolerant vegetation. Furthermore, the rooftop runoff will be directed to the extended detention basin on

the eastern boundary of the project site. The extended detention basin will facilitate infiltration of stormwater runoff.

However, due to the project's small size in relationship to the total size of the groundwater subbasin and implementation of the project BMPs, there will not be a substantial effect upon groundwater recharge within the groundwater basin. Therefore, groundwater recharge is not expected to be significantly impacted by the project. Impacts are **less than significant**.

Threshold: *Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.*

The project is estimated to include a maximum of 90 percent impervious surfaces. By increasing the percentage of impervious surfaces on the site, less water will percolate into the ground and more surface runoff will be generated. In order to reduce the amount of stormwater exiting the project site, post-construction, a series of underground stormdrain pipelines will be constructed to collect rooftop, parking lot, and landscaped area runoff and convey it to a proposed extended detention basin on the eastern boundary of the project site. Off-site stormwater flows, from a large area west of Interstate 215 will be isolated from the project's extended detention basin, and during heavy precipitation events will be conveyed through an earthen channel. This earthen channel will pick up 10-year (or greater) storm flows along Webster Avenue west of the project site, and will convey these flows south along the western extent of the project site toward Rider Street, east along the southern extent of the project site, and stormwater flows will be picked up by a 24-inch reinforced concrete pipe near the southeastern corner of the project site. This earthen off-site stormwater collector facility has been incorporated into the landscaped areas, and will be constructed as part of the project (see Figure 4.8-2). The intent of this earthen channel is to isolate the off-site stormwater from on-site stormwater, thus reducing the volume of flows entering the project water quality feature, extended detention basin.

The site is located within the area covered by the RCFC&WCD Area Drainage Plan (ADP) for the Perris Valley region. According to the ADP, the project site is tributary to the upstream terminus point of Lateral H-5 which extends along Rider Avenue from the intersection with McKimball Road, to the intersection of Rider Avenue and Indian Avenue. Lateral H-5 is not currently in place.

The following facilities are proposed in order to mitigate the risk of flooding (associated with storm events with a return period up to 100 years) on- and off-site:

- Approximately 2,500 linear feet of up to 42-inch underground stormdrain pipelines will be constructed on-site to convey rooftop runoff to the extended detention basin. Above ground ribbon gutters will be constructed within the parking area to convey stormwater runoff directly into the extended detention basin.
- Approximately 3,000 linear feet of earthen channel will be constructed on-site, on the western and southern periphery of the project site to convey off-site flows toward the Perris Valley Stormdrain Channel.

- Approximately 7,400 linear feet of 24-inch reinforced concrete pipe (RCP) storm drain to convey stormwater flows collected from on-site stormdrain facilities including runoff from driveways, roof tops, and landscaped areas. These flows are proposed to discharge into the unlined Perris Valley Stormdrain Channel.

According to the Perris Valley Area Plan, the Perris Valley Stormdrain Channel is an earthen flood control channel and conveys flows released from upstream areas and flows from storm drains discharging into the channel. The Perris Valley Channel is an ADP facility and was designed to accommodate flows from the Perris Valley ADP watershed in a 100-year storm event after development of the watershed, including the project site. On-site stormdrain facilities will be constructed and connected to the Perris Valley Stormdrain Channel. Stormwater runoff from the proposed project will not exceed the capacity of existing or planned stormwater drainage systems. Potential impacts related to existing or planned storm water drainage systems are therefore **less than significant**.

In order to reduce the discharge of expected pollutants, such as sediment, into receiving waters during construction of the proposed development, the project proponent will be required to prepare a site-specific SWPPP in accordance with the State Water Resources Control Board's (SWRCB) General Permit for Construction Activities. The General Permit requires development and implementation of a site-specific SWPPP to identify an effective combination of erosion control and sediment control BMPs to minimize or eliminate the discharge of pollutants into receiving waters. In addition, BMPs for managing sources of non-storm water discharges and waste are required to be identified in the SWPPP. Examples of construction BMPs include silt fencing, gravel bag berms, fiber rolls, and street sweeping. In addition, the SWPPP is required to identify non-structural post-construction BMPs. Examples of non-structural, post-construction BMPs include catch basin stenciling, and tenant education.

In order to reduce the discharge of expected pollutants, such as oil, grease and trash, into receiving waters following development, the project proponent will be required to be in compliance with the latest version of the County's requirements for new development and redevelopment, including development and implementation of a project-specific WQMP. The project-specific WQMP will identify BMPs to ensure that water quality of receiving waters is not degraded following development. New projects submitted to the City of Perris (a co-permittee listed in the Riverside County WQMP) are required to submit a project-specific WQMP prior to the first discretionary project approval or permit. Project applicants may submit a preliminary project-specific WQMP for discretionary project approval (land use permit); however, a final version would be submitted for review and approval prior to the issuance of any grading or building permits. The project will include industrial development and parking lots. By complying with the County's WQMP requirements and the NPDES permit requirements the proposed project is not anticipated to provide substantial additional sources of polluted runoff. Potential impacts related to storm water runoff are therefore **less than significant**.

Threshold: *Substantially degrade water quality.*

Various potential pollutants generated from construction and use of industrial developments can adversely affect water quality in a variety of ways. Expected pollutants from an industrial facility include: trash and debris and oil and grease. Potential pollutants associated with industrial development include sediment/turbidity, nutrients, oxygen-demanding substances, pesticides, organic compounds, and metal. Expected pollutants from industrial parking lots include; organic compounds, trash and debris, oil and grease, and metals. These pollutant categories are listed below. **Table 4.8-C, Anticipated and Potential Pollutants Generated by Land Use Types**, provides a summary of the different pollutants anticipated by different types of development that could be generated from the project site.

Sediments – Sediments are soils or other surficial materials eroded and then transported or deposited by the action of wind, water, ice, or gravity. Sediments can increase turbidity, clog fish gills, reduce spawning habitat, lower young aquatic organisms survival rates, smother bottom dwelling organisms, and suppress aquatic vegetation growth.

Trash and Debris – Trash (such as paper, plastic, polystyrene packing foam, and aluminum materials) and biodegradable organic matter (such as leaves, grass cuttings, and food waste) are general waste products on the landscape. The presence of trash and debris may have a significant impact on the recreational value of a water body and aquatic habitat. Excess organic matter can create a high biochemical oxygen demand in a stream and thereby lower its water quality. In addition, in areas where stagnant water exists, the presence of excess organic matter can promote septic conditions resulting in the growth of undesirable organisms and the release of odorous and hazardous compounds such as hydrogen sulfide.

Oxygen-Demanding Substances – This category includes biodegradable organic material as well as chemicals that react with dissolved oxygen in water to form other compounds. Proteins, carbohydrates, and fats are examples of biodegradable organic compounds. Compounds such as ammonia and hydrogen sulfide are examples of oxygen-demanding compounds. The oxygen demand of a substance can lead to depletion of dissolved oxygen in a water body and possibly the development of septic conditions.

Oil and Grease – Oil and grease are characterized as high-molecular weight organic compounds. Primary sources of oil and grease are petroleum hydrocarbon products, motor products from leaking vehicles, esters, oils, fats, waxes, and high molecular-weight fatty acids. Introduction of these pollutants to the water bodies are very possible due to the wide uses and applications of some of these products in municipal, residential, commercial, industrial, and construction areas. Elevated oil and grease content can decrease the aesthetic value of the water body, as well as the water quality.

Nutrients – Nutrients are inorganic substances, such as nitrogen and phosphorus. They commonly exist in the form of mineral salts that are either dissolved or suspended in water. Primary sources of nutrients in urban runoff are fertilizers and eroded soils. Excessive discharge of nutrients to water bodies and streams can cause excessive aquatic algae and plant growth. Such excessive production, referred to as cultural eutrophication, may lead to excessive decay of

organic matter in the water body, loss of oxygen in the water, release of toxins in sediment, and the eventual death of aquatic organisms.

Pathogens – Pathogens (bacteria and viruses) are ubiquitous microorganisms that thrive under certain environmental conditions. Their proliferation is typically caused by the transport of animal or human fecal wastes from the watershed. Water, containing excessive bacteria and viruses can alter the aquatic habitat and create a harmful environment for humans and aquatic life. Also, the decomposition of excess organic waste causes increased growth of undesirable organisms in the water.

Metals – The primary source of metal pollution in urban runoff is typically commercially available metals and metal products. Metals of concern include cadmium, chromium, copper, lead, mercury, and zinc. Lead and chromium have been used as corrosion inhibitors in primer coatings and cooling tower systems. Metals are also raw material components in non-metal products such as fuels, adhesives, paints, and other coatings. At low concentrations naturally occurring in soil, metals may not be toxic. However, at higher concentrations, certain metals can be toxic to aquatic life. Humans can be impacted from contaminated groundwater resources, and bioaccumulation of metals in fish and shellfish. Environmental concerns, regarding the potential for release of metals to the environment, have already led to restricted metal usage in certain applications.

Organic Compounds – Organic compounds are carbon-based. Commercially available or naturally occurring organic compounds are found in pesticides, solvents, and hydrocarbons. Organic compounds can, at certain concentrations, indirectly or directly constitute a hazard to life or health. When rinsing off objects, toxic levels of solvents and cleaning compounds can be discharged to the MS4. Dirt, grease, and grime retained in the cleaning fluid or rinse water may also adsorb levels of organic compounds that are harmful or hazardous to aquatic life.

Potential Impacts from Construction Activities

Project construction would have the potential to result in substantial additional sources of polluted runoff which could have short-term impacts on surface water quality through activities such as demolition, clearing and grading, stockpiling of soils and materials, concrete pouring, painting, and asphalt surfacing. Construction of project would involve various types of equipment such as dozers, scrapers, backhoes, other earthmoving equipment, dump trucks, cranes, trucks, concrete mixers, and generators. Stockpiled soils and other construction materials for use during later construction phases would be stored outdoors during construction. Pollutants associated with these construction activities that could result in water quality impacts include soils, debris, other materials generated during demolition and clearing, fuels and other fluids associated with the equipment used for construction, paints, other hazardous materials, concrete slurries, and asphalt materials.

These pollutants could impact water quality if they are washed off site by storm water or non-storm water, or are blown or tracked off site to areas susceptible to wash off by storm water or non-storm water. Sediment is the most common pollutant associated with construction sites because of the associated earth moving activities and areas of exposed soil. Sediment that is

washed off site can result in turbid waters which can impact aquatic species. In addition, when sediment is deposited in receiving water it can smother species, alter the substrate and habitat, and alter the drainage course. Hydrocarbons, such as fuels, asphalt materials, and oils, and hazardous materials such as paints and concrete slurries, could be discharged from the site, and could impact aquatic plants and animals downstream. Debris and trash discharged from the site could be deposited in receiving waters and could impact wildlife as well as aesthetics.

The General Construction Storm Water Permit requires the development and implementation of an SWPPP. The SWPPP must contain a site map which shows the construction site perimeter, existing and proposed buildings, lots, roadways, storm water collection and discharge points, general topography both before and after construction, and drainage patterns across the project. The SWPPP must list BMPs the discharger will use to protect storm water runoff, and the placement of those BMPs. Construction BMPs typically includes, and are not limited to: proper storage, use, and disposal of construction materials including: removal of sediment from surface runoff before it leaves the site by silt fencing or other similar devices around the site perimeter with particular attention to protecting water bodies listed on the 303(d) list for sediment; protection of all storm drain inlets on site or downstream of the construction site to eliminate entry of sediment, stabilization of cleared or graded slopes; diversion of runoff from uphill areas around disturbed areas of the site; prevention of tracking soil off site through use of a gravel strip or wash facilities at exit areas; protection or stabilization of stockpiled soils; and continual inspection and maintenance of all specified BMPs through the duration of construction. Additionally, the SWPPP shall contain a visual monitoring program.

Potential Impacts Following Construction

Following construction, the development of individual project areas with structures, concrete, asphalt, and landscaping would reduce the potential for erosion on the site and sediment discharges. Also, equipment and hazardous materials associated with construction would be removed from the site, which would reduce the potential for pollutants to be discharged from the site. However, use and operation of the project would generate pollutants that could impact water quality. **Table 4.8-C, Anticipated and Potential Pollutants Generated by Land Use Types**, provides a summary of the different pollutants anticipated by different types of development that could be generated from the project site. These pollutants could be washed from developed sites and into the storm drain or adjacent drainages.

Landscaping could result in water quality impacts due to the use of fertilizers. If fertilizers are discharged, they could adversely affect aquatic plants and animals downstream in receiving waters through a reduction in oxygen levels and an increased eutrophication. Eutrophication is the process of over-enrichment of nutrients in a water body fostering an increase in biotic life that results in a significant loss of dissolved oxygen.

As indicated in the *Hydrology Report* prepared for the project, and discussed above, the project basin and stormdrain pipelines will discharge into a 24-inch underground stormdrain pipeline within Rider Street, which will convey stormwater flows approximately 7,400 linear feet east to the Perris Valley Stormdrain Channel. The Perris Valley Stormdrain discharges directly into Reach 3 of the San Jacinto River. As indicated above, Reach 3 of the San Jacinto River is

tributary to Canyon Lake and Lake Elsinore, both of which are on the Federal 303 (d) list of impaired water bodies. Canyon Lake is impaired for pathogens, and Lake Elsinore is impaired for poly chlorinated biphenyls (PCBs (or pesticides)), and unknown toxicity. Since Lake Elsinore is considered a closed water body under typical climatic conditions, no other downstream water bodies have been considered in this analysis. Therefore, the pollutants of concern associated with the project include, pathogens and organic compounds.

The extended detention basin will treat stormwater to medium removal efficiency for the following pollutants of concern: sediment/turbidity, nutrients, trash and debris, oxygen demanding substances, oil and grease, and metals. Therefore, impacts to Federal 303 (d) listed water bodies are considered **less than significant**.

The Perris Valley Stormdrain Channel is capable of conveying the 100-year increased runoff from the subject development. The project proposes an extended detention basin on the eastern extent of the site, as well as vegetated areas between the parking areas and the surrounding roadways, which will increase the amount of post construction infiltration. In order to reduce the amount of stormwater exiting the project site post-construction, a series of underground stormdrain pipelines will be constructed to collect rooftop, parking lot, and landscaped area runoff and convey it to a proposed extended detention basin on the eastern boundary of the project site.

As discussed above, off-site stormwater flows, from a large area west of Interstate 215, will be isolated from the project extended detention basin, and will be conveyed through an existing earthen channel. This earthen channel will pick up off-site flows along Webster Avenue to the west of the project site, and will convey flows south along the western extent of the project site toward Rider Street, east along the southern extent of the project site, and will be picked up by a 24-inch reinforced concrete pipe near the southeastern corner of the project site. This earthen off-site stormwater collector facility has been incorporated into the landscaped areas, and will be constructed as part of the project (see Figure 4.8-2). The intent of this earthen channel is to isolate the off-site stormwater from on-site stormwater, thus reducing the volume of flows entering the project water quality feature, extended detention basin.

Potential impacts that could result from different pollutant categories discharged to receiving waters were discussed above. Canyon Lake and Lake Elsinore are listed on the Federal 303 (d) list as impaired for pathogens and pesticides, respectively. The project BMP, the extended detention basin, will treat on-site stormwater flows to a moderate level, as indicated in the project WQMP.

As discussed above, in order to reduce the discharge of expected pollutants into receiving waters following development, the project proponent will be required to be in compliance with the latest version of the County's WQMP requirements for new development and redevelopment. By complying with NPDES permit requirements and implementation of the project-specific WQMP, impacts to water quality standards will be **less than significant**.

**Table 4.8-C, Anticipated and Potential Pollutants
Generated by Land Use Types**

General Pollutant Categories									
Type of Development (Land Use)	Sediment/Turbidity	Nutrients	Organic Compounds	Trash & Debris	Oxygen Demanding Substances	Bacteria & Viruses	Oil & Grease	Pesticides	Metals
Commercial/Industrial Development	P ⁽¹⁾	P ⁽¹⁾	P ⁽⁴⁾	E	P ⁽¹⁾	P ⁽²⁾	E	P ⁽¹⁾	P
Parking Lots	P ⁽¹⁾	P ⁽¹⁾	E ⁽³⁾	E	P ⁽¹⁾	P ⁽⁵⁾	E	P ⁽¹⁾	E
Streets, Highways & Freeways	E	P ⁽¹⁾	E ⁽³⁾	E	P ⁽¹⁾	P ⁽⁵⁾	E	P ⁽¹⁾	E

E = Expected P = Potential N = Not expected

(1) A potential pollutant if landscaping or open area exists on the project site.

(2) A potential pollutant if land use involves animal waste.

(3) Specifically, petroleum hydrocarbons.

(4) Specifically, solvents.

(5) Bacterial indicators are routinely detected in pavement runoff.

Threshold: *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on or off site.*

The project site consists of flat farmland, sloping slightly to the south-southeast. The project site has been heavily disturbed by activities associated with agriculture. The existing drainage pattern of the site is from the northwest to the southeast, following the topography of the project site. On-site stormwater flows sheet flow across the site southeast toward the intersection of Rider Street and Indian Avenue.

Currently, runoff from this site and areas upstream of this site discharge as sheet flow on and across adjacent downstream properties as sheet flow, including inundation of local streets. After the construction of proposed facilities, on-site runoff will increase. In order to reduce the volume of on-site runoff post-project, an extended basin is proposed which will attenuate peak flows down to existing flow quantities. The extended basin, which also serves as a water quality Treatment Control Facility, is designed to reduce peak flows associated with storms ranging from 2 to 100 year return frequencies. A proposed 24-inch “bleeder” line will drain the proposed basin. The proposed 24-inch line will be placed in Rider Street eastward to the connection of the Perris Valley Stormdrain Channel, a regional flood control facility. The proposed bleeder line will be maintained by City of Perris. All encroachment permits for connection to RCFC&WCD’s Perris Valley Storm Drain will be applied, prior to construction of connections.

Off-site flows will be mitigated by implementation of conveyance features such as fully improved streets, as well as an earthen channel. These features simultaneously protect the site and convey runoff in a controlled fashion around the proposed development. Ultimately, the largest off-site flows are released as sheet flow to historical destinations. An extension to the proposed 24-inch bleeder line is proposed to connect to the downstream end of the proposed

earthen channel thereby conveying a portion of off-site runoff to the Perris Valley Stormdrain Channel.

In order to provide conveyance for and avoid treatment of off-site stormwater drainage around the project site, the project proposes to construct an unlined earthen channel along the western and southern boundaries of the site, within the landscaped areas (see Figure 3.8-2). This earthen channel will provide the conveyance of off-site flows around the proposed development, and once at the southeast corner of the project site, these flows will connect to the project proposed 24-inch RCP, and would be conveyed directly to the Perris Valley Stormdrain Channel. Through implementation of the site specific WQMP, and the construction of the on- and off-site stormdrain facilities, impacts to the natural drainage pattern of the site are considered **less than significant**.

***Threshold:** Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.*

The project site consists of flat farmland, sloping slightly to the south-southeast. The project site has been heavily disturbed by activities associated with agriculture. Agriculture is not active on the project site at this time. The existing drainage pattern of the site is from the northwest to the southeast, following the topography of the project site. On-site stormwater flows sheet flow across the site southeast toward the intersection of Rider Street and Indian Avenue.

Development of the site will increase the amount of impervious surfaces, thereby reducing the amount of rain water that would be subject to infiltration. Implementation of the project will add impervious surfaces to an estimated 90 percent (56 acres) of the approximately 62 acre site. By increasing the percentage of impervious surfaces on the site, less water will percolate into the ground and more surface runoff will be generated. In order to reduce the runoff potential on-site, approximately 6 acres of the site are planned for vegetated landscaping. The landscape design will minimize the use of impervious surfaces. It will focus on planting of drought tolerant vegetation appropriate for the local climate.

The on-site surface runoff will be collected within the on-site stormdrain facilities mentioned above, and will be conveyed to the Perris Valley Stormdrain Channel, approximately 7,400 linear feet to the east of the project site. The on-site facilities have been designed to accommodate 100-year storm runoff from the project site. Perris Valley Stormdrain Channel is also designed to accommodate 100-year storm flows. Therefore, after implementation of the proposed storm drain plan and WQMP the proposed project will not result in peak flows exiting the site that would result in flooding on or off site. Impacts are considered to be **less than significant**.

Proposed Mitigation Measures

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (CEQA Guidelines, Section 15126.4). No mitigation measures related to Hydrology and Water Quality have been identified, as implementation of the project-specific WQMP and NPDES permit requirements will eliminate or reduce the potential significant adverse impacts related to increased flows and water quality.

Summary of Environmental Effects After Mitigation Measures Are Implemented

After implementation of NPDES permit requirements and the project-specific WQMP, all potential impacts are reduced to a level that is less than significant.

4.9 LAND USE/PLANNING

Potential impacts related to physically dividing an established community were found to be less than significant in the Initial Study/NOP prepared for this proposed project (Appendix A). The focus of the following discussion is related to potential conflicts with applicable land use plans, policies or regulations. Potential conflicts with any applicable habitat conservation plan or natural community conservation plan are addressed in Section 4.4 (Biological Resources) of this document.

In addition to other documents, the following references were used in the preparation of this section of the DEIR:

- City of Perris, *City of Perris General Plan 2030*, July 12, 2005. (Available at the City of Perris and at www.cityofperris.org/city-hall/general-plan.html, accessed on February 27, 2008.)
- City of Perris, *City of Perris General Plan 2030 Draft EIR*, October 2004. (Available at the City of Perris and at www.cityofperris.org/city-hall/general-plan.html, accessed on February 27, 2008)
- City of Perris, *City of Perris Development Code*. (Available at the City of Perris and at the City of Perris website under the title of *Perris City Zoning Code* at www.cityofperris.org/planning/zoning-code/, accessed on February 27, 2008.)
- Southern California Association of Governments, *2008 RTP Growth Forecasts*, (Available at the Southern California Association of Governments (SCAG) and at www.scag.ca.gov/forecast/index.htm, accessed on January 18, 2009.)
- Southern California Association of Governments, *The New Economy and Jobs/Housing Balance in Southern California*, April 2001. (Available at the Southern California Association of Governments (SCAG) and at www.scag.ca.gov/Housing/balance.html, accessed on January 18, 2009.)

Setting

The Rados Distribution Center project site is located in the City of Perris. Interstate 215 and the Burlington Northern Santa Fe (BNSF) railway are located to the west of the project site and March Air Reserve Base is located to the north of the project site (**Figure 4.9-1, Existing and Surrounding Land Use**). The project site property is within the City of Perris Planning Area 3: Agricultural Conversion Area and is currently zoned A1 (Light Agriculture) which is inconsistent with the General Plan Land Use Designation of LI (Light Industrial) applicable to most of the project site. The project site consists of approximately 61.63 acres of zoned light industrial land (**Figure 4.9-2, Zoning**). The project includes a requested change of zoning from A1 to LI, which would be consistent with the General Plan and the proposed land use. The northern approximately 155 feet of the project site is located within an MWD parcel, which has a General Plan land use designation of “Public/Semi-Public Facilities/Utilities.” Properties within the “Public/Semi-Public Facilities/Utilities” land use category are locations for government

facilities, public schools, and public services and utilities such as water and sewer district operations. The project proposes overflow trailer parking within this parcel. Such uses are consistent with the land use designation and would not interfere with continued MWD use of their parcel (**Figure 4.9-3, General Plan Land Use Designations**).



Source: Digital Globe, March 2008.

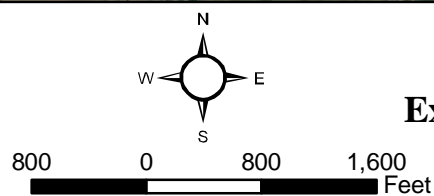
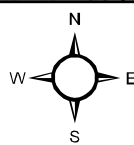


Figure 4.9-1
Existing and Surrounding
Land Use

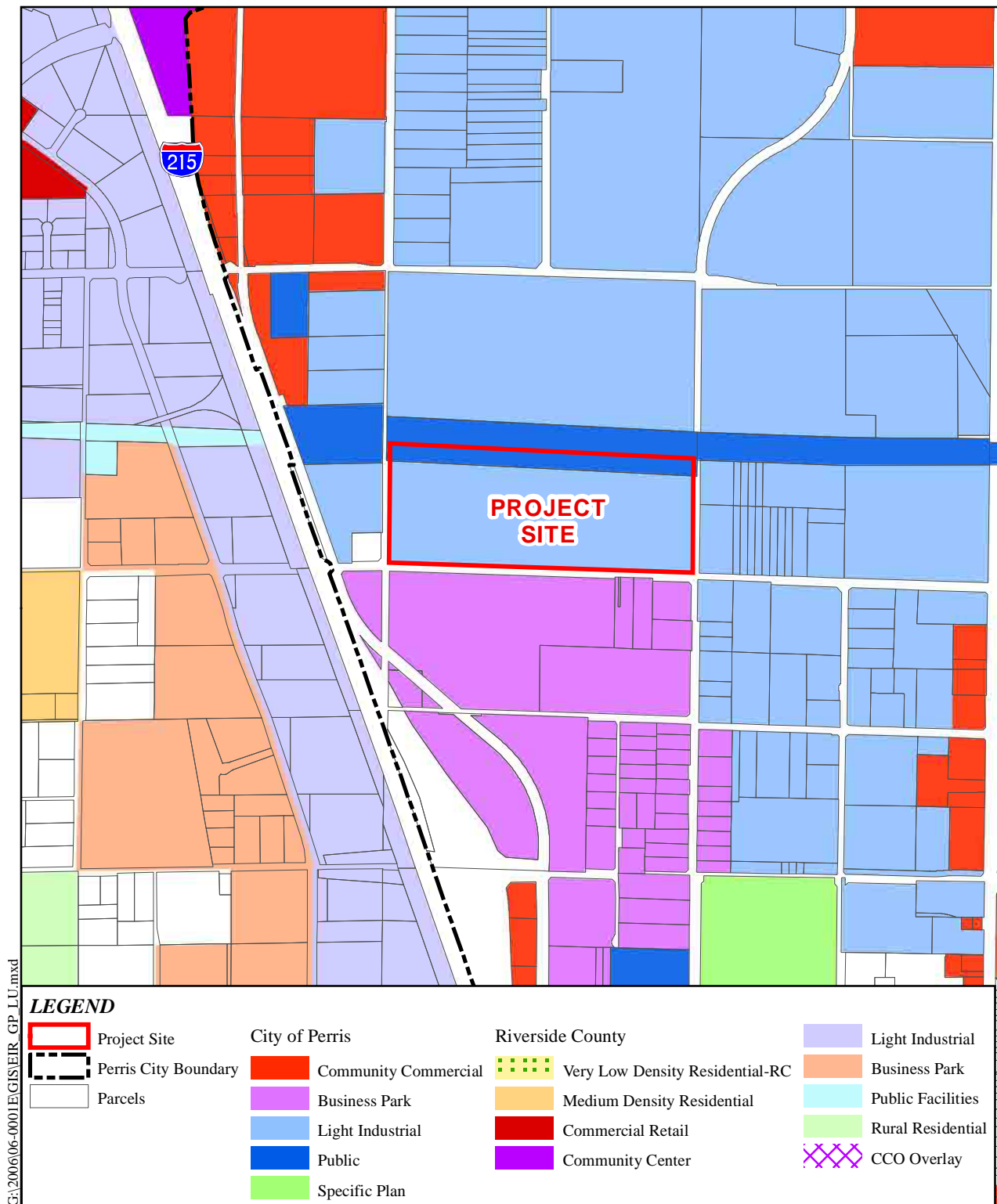


Source: County of Riverside, 1994
(as amended through July 2008);
City of Perris, June 2004.



800 0 800 1,600
Feet

Figure 4.9-2
Zoning



Source: County Of Riverside General Plan,
Oct. 2003 (as revised through Nov. 2007);
City of Perris General Plan, April 2005.

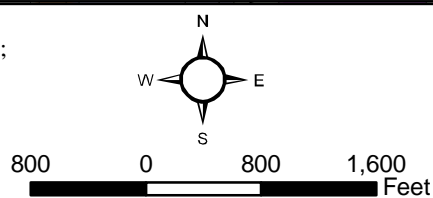


Figure 4.9-3
General Plan
Land Use Designations

Related Regulations

General Plan

On April 26, 2005, the City of Perris approved its current General Plan. The General Plan includes the development of land use policies and land use maps to guide the future development of the City of Perris. As part of the General Plan, Planning Areas were established that define the nature of those communities and define the land use designations that are appropriate for the development envisioned. The Rados Distribution Center site is located within Planning Area 3 of the General Plan. The project site's land use designations, shown on Figure 4.9-2, are "Light Industrial" (LI) and "Public/Semi-Public Facilities/Utilities", which are consistent with the proposed project.

Title 19 Zoning Code

Development of the project site is regulated by the City of Perris zoning ordinance (City zoning ordinance/development code Ordinance No. 1051). This ordinance contains the regulatory framework that specifies allowable uses for real property and development intensities; the technical standards such as site layout, building setbacks, heights, lot coverage, parking, etc.; aesthetics related to physical appearance, landscaping, and lighting; a program that implements policies of the General Plan; and the procedural standards for amending or establishing new zoning regulations.

General Plan Policies

The following are policies from the City of Perris General Plan related to Land Use Planning that are applicable to the proposed project.

- | | |
|------------------------|--|
| Land Use Policy II.A: | Require new development to pay its full, fair-share of infrastructure costs. |
| Land Use Policy II.B: | Require new development to include school facilities or pay school impact fees, where appropriate. |
| Land Use Policy III.A: | Accommodate diversity in the local economy. |
| Land Use Policy V.A: | Restrict development in areas at risk of damage to disasters. |

Regional Plan

SCAG has adopted policies as part of its Regional Comprehensive Plan and Guide, Regional Transportation Plan, and Compass Growth Vision many of which are applicable to this project. A comparative analysis of the project's consistency with these policies is discussed below. The information and data in this section was obtained from the *SCAG 2008 RTP Growth Forecast* and SCAG's report titled, *The New Economy and Jobs/Housing Balance in Southern California (2001)*.

Design Considerations

The project will comply with City design guidelines. No other specific design measures are proposed.

Thresholds of Significance

The City of Perris has not adopted its own thresholds of significance and, instead, defers to the thresholds of significance identified in Appendix G of the CEQA Guidelines. Based on Appendix G of the CEQA Guidelines, impacts to land use and planning may be considered potentially significant if the project would:

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

Environmental Impacts Before Mitigation

***Threshold:** Conflict with applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinances) adopted for the purpose of avoiding or mitigating an environmental effect.*

Section 15125 (d) of the CEQA Guidelines requires EIRs to “...discuss any inconsistencies between the proposed project and applicable general plans and regional plans.” The objective of such a discussion is to find ways to modify the proposed project, if warranted, to reduce any identified inconsistencies with relevant plans and policies. Pursuant to Section 15125(d), this Draft EIR chapter includes an evaluation of the consistency of the proposed project with pertinent goals and policies of relevant adopted local and regional plans.

Local Plans

General Plan

The City of Perris adopted its General Plan Land Use Element on April 26, 2005. For purposes of the Land Use Element the City of Perris is divided into ten Planning Areas. The planning areas are defined by similarities and opportunities in land uses, development patterns, and future developments. The Rados Distribution Center is located in Planning Area 3: Agricultural Conversion Area. The largest land use designation within the Planning Area is Light Industrial (1,073 acres). Additionally, 207 acres within Planning Area 3 are designated Community Commercial.

The following are policies and implementation measures from the City of Perris General Plan that are applicable to the proposed project as well as a discussion on how the project is consistent

with these policies and measures (see **Table 4.9-A, Consistency with City of Perris General Plan Policies and Measures**).

Table 4.9-A
Consistency with City of Perris General Plan Policies and Measures

Circulation Element		
Policy/ Measure No.	Policy/Measure Text	Statement of Consistency
<i>Policy I.A:</i>	<i>Design and develop the transportation system to respond to concentrations of population and employment activities, as designated by the Land Use Element and in accordance with the designated Transportation System, Exhibit 4.2 Future Roadway Network</i>	As discussed in Section 4.12, the proposed project's related transportation improvements do not conflict with the Land Use Element or the designated Transportation System. Therefore, the proposed project is consistent with this policy.
<i>Measure I.A.6:</i>	<i>Require parking facility design that minimizes visual and physical impacts while maintaining pedestrian and motorist safety and supporting adjacent activities.</i>	Proposed developments within project area will be required to comply with the City's Municipal Code and the City Guidelines by minimizing vehicular conflict, avoiding conflicts between pedestrian and vehicular circulation and screening parking lots from public view through the use of berms, low walls and or/plant materials. Therefore, the proposed project will comply with this measure.
<i>Policy I.B:</i>	<i>Support development of a variety of transportation options for major employment and activity centers including direct access to commuter facilities, primary arterial highways, bikeways, park-n-ride facilities, and pedestrian facilities.</i>	Riverside Transit Authority (RTA) Routes 19 and 41 operate throughout the proposed project areas described in Traffic and Transportation (Section 4.12). The proposed project is also located directly adjacent to I-215, providing easy access for employees. Therefore, the proposed project is consistent with this policy.
<i>Measure I.B.1:</i>	<i>Require on-site improvements that accommodate public transit vehicles (i.e., bus pullouts and transit stops and cueing lanes, bus turnarounds and other improvements) at major trip attractions (i.e., community centers, tourist and employment centers, etc.).</i>	The project will include roadway improvements which include sidewalks and bike racks, and is located near to existing bus routes. The project will not conflict with the City's adopted policies, plans or programs supporting alternative modes of transportation. Therefore, the proposed project will comply with this measure.
<i>Policy I.D:</i>	<i>Encourage and support the development of projects that facilitate and enhance the use of alternative modes of transportation.</i>	Riverside Transit Authority (RTA) Routes 19 and 41 operate throughout the proposed project area, and can be accessed from multiple transfer points as described in Traffic and Transportation (Section 4.12). The proposed project is also located directly adjacent to I-215, providing easy access for employees. Therefore, the proposed project is consistent with this policy.

<p><i>Policy II.A:</i></p>	<p><i>Maintain the following target Levels of Service:</i></p> <ul style="list-style-type: none"> • <i>LOS D along all City-maintained roads (including intersections) and LOS D along I-215 and SR-74 (including intersections with local streets and roads). An exception to the local road standard is LOS E, at intersections of any Arterials and Expressways with SR-74, the Ramona-Cajalco Expressway, or at I-215 freeway ramps.</i> • <i>LOS “E may be allowed within the boundaries of the Downtown Specific Plan Area to the extent that it would support transit-oriented development and walkable communities. Increased congestion in this area will facilitate an increase in transit ridership and encourage development of a complementary mix of land uses within a comfortable walking distance from light rail stations.</i> 	<p>As described in Section 4.12 Traffic and Transportation, the proposed project will not cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system, and will not exceed, either individually or cumulatively, a Level of Service D on any City-maintained roads [including intersections] and along I-215 and SR-74 [including intersections with local streets and roads], or a LOS E at intersections of any Arterials and Expressways with SR-74, the Ramona-Cajalco Expressway, or at I-215 Freeway ramps. Therefore, the proposed project is consistent with this policy.</p>
<p><i>Measure II.A.I:</i></p>	<p><i>Utilize existing infrastructure (lanes, median islands, turn lanes, available right-of-way) and rights-of-way to the maximum extent practicable.</i></p>	<p>The project will utilize and improve the surrounding existing infrastructure. Therefore, the proposed project will comply with this measure.</p>
<p><i>Policy II.B:</i></p>	<p><i>Maintain the existing transportation network while providing for future expansion and improvement based on travel demand, and the development of alternative travel modes.</i></p>	<p>The project is utilizing the existing road network and will improve the existing road network based on requirements through the traffic analysis prepared for the project as described in Section 4.12 Traffic and Transportation. Therefore, the proposed project is consistent with this policy.</p>

<i>Measure II.B.1:</i>	<p><i>Develop Standard Specifications for the City of Perris that include the following:</i></p> <ul style="list-style-type: none"> ● <i>Cross sections and classifications identified in Exhibit CE-11;</i> ● <i>Facilities that accommodate bus operations, including bus turn outs, and other design features;</i> ● <i>Design guidelines that define the minimum design and technical criteria for the analysis and design of roadway facilities. Such design guidelines shall identify intersection improvements consistent with the lane geometrics referenced in Table CE-7;</i> ● <i>Limiting access points and intersections of streets and highways based upon the road's General Plan classification and function to reduce motorist conflicts and enhance continual traffic flow. Access points must be located a sufficient distance away from major intersections and from access points on adjoining parcels to allow for safe, efficient operation; and</i> ● <i>Roadway pavement cross-section to accommodate large trucks where extensive truck travel involving regional movement of bulk goods is anticipated</i> 	<p>As shown in the City of Perris GP, Table CE-7, Exhibit CE-11A through CE-11F, the City has adopted roadway standards for its roadway network. The design of the project complies with this implementation measure, including lane geometrics, limited access points, and truck access points. Therefore, the proposed project will comply with this measure.</p>
<i>Measure II.B.2:</i>	<p><i>Allow roundabouts or other innovative design solutions when a thorough traffic impact assessment has been conducted demonstrating that such an intersection design alternative would manage traffic flow and improve safety.</i></p>	<p>The project does not utilize roundabouts or other such design features. The Traffic Impact Analysis did/did not indicate that alternative design features were necessary. Therefore, the proposed project will comply with this measure.</p>
<i>Measure II.B.3:</i>	<p><i>Restrict on-street parking to reduce traffic congestion and improve safety in appropriate locations such as expressways and arterials, and require all new development to provide adequate off-street parking based on expected parking needs.</i></p>	<p>The project does not allow for on-street parking for its employees or tenants. The project parking has been designed in accordance with City Code requirements. Therefore, the proposed project will comply with this measure.</p>
<i>Policy III.A:</i>	<p><i>Implement a transportation system that accommodates and is integrated with new and existing development and is consistent with financing capabilities.</i></p>	<p>As discussed in Transportation and Traffic (Section 4.12), the project utilizes the existing transportation system, and will be required to construct near-term improvements and fund its fair share contributions for long-term improvements. The proposed project is consistent with this policy.</p>

<i>Measure III.A.1:</i>	<i>Distribute the costs of transportation system improvements for new development equitably among beneficiaries through the City's Traffic Impact Fee Program.</i>	The project will be required to pay their fair share of the City's Traffic Impact Fee Program. Therefore, the proposed project will comply with this measure.
<i>Measure III.A.2:</i>	<i>Use redevelopment agreements, revenue sharing agreements, tax allocation agreements and the CEQA process as tools to ensure that new development pays a fair share of costs to provide local and regional improvements and to mitigate cumulative traffic impacts.</i>	As has been analyzed in Transportation and Traffic (Section 4.12), the project will be required to contribute their fair share of fees and other improvements to mitigate cumulative traffic impacts. Development of the proposed project will actually improve the facilities needed to address cumulative traffic impacts. Therefore, the proposed project will comply with this measure.
<i>Measure III.A.4:</i>	<i>Require developers to be primarily responsible for the improvements of streets and highways to developing commercial, industrial, and residential areas. These may include road construction or widening, installation of turning lanes and traffic signals, and the improvement of any drainage facility or other auxiliary facility necessary for the safe and efficient movement of traffic or the protection of road facilities.</i>	As has been analyzed in Transportation and Traffic (Section 4.12), future development applicants will be required to contribute their fair share of fees and other improvements to mitigate cumulative traffic impacts. Development of the proposed project will actually improve the facilities needed to address cumulative traffic impacts. Therefore, the proposed project will comply with this measure.
<i>Policy IV.A:</i>	<i>Provide non-motorized alternatives for commuter travel as well as recreational opportunities that maximize safety and minimize potential conflicts with pedestrians and motor vehicles.</i>	A regional trail runs along the eastern border of the project site providing for non-motorized commuter travel and recreational opportunities. The proposed project is consistent with this policy.
<i>Policy V.A:</i>	<i>Provide for safe movement of goods along the street and highway system</i>	The project will implement the City's adopted transportation system in accordance with local regulations and in compliance with CEQA. The project will also implement requirements for separate truck entrances in order to avoid conflicts with other automobile traffic entering and exiting the site. The proposed project is consistent with this policy.
<i>Measure V.A.7:</i>	<i>Require streets abutting properties in Light Industrial and General Industrial zones to conform to standard specifications for industrial collector streets to accommodate the movement of heavy trucks.</i>	The project will implement the City's adopted transportation system in accordance with local regulations and in compliance with CEQA. Therefore, the proposed project will comply with this measure.
<i>Measure V.A.8:</i>	<i>Provide adequate off-street loading areas for all commercial and manufacturing land uses.</i>	In accordance with City of Perris Development Code 19.69, require future development applicants to establish off-street loading areas for commercial and manufacturing activities. Therefore, the proposed project will comply with this measure.

<i>Policy VI.A</i>	<i>Recognize and support policies contained in the March Air Cargo Port General Plan.</i>	As discussed in Section 4.2, Airport Hazards, the project has been evaluated in accordance to the 2005 AICUZ, the 1884 ALUP, and the 1986 Airport Influence Area Map and was found to be compatible with those documents and no significant impacts remain after implementation of applicable mitigation measures. Therefore, the proposed project is consistent with this policy.
<i>Policy VII.A:</i>	<i>Implement the Transportation System in a manner consistent with Federal, State, and local environmental quality standards and regulations.</i>	The project will implement a Transportation System in accordance with local regulations and in compliance with CEQA. The proposed project is consistent with this policy.
<i>Measure VII.A.1:</i>	<i>Incorporate the specific requirements of the Riverside County Multi-Species Habitat Conservation Plan into transportation plans and development proposals.</i>	The project will implement the requirements of the Riverside County MSHCP, as discussed in Section 4.4 Biological Resources. Therefore, the proposed project will comply with this measure.
<i>Measure VII.A.2:</i>	<i>Require noise mitigation measures (e.g., wall treatments, landscape berms, and/or building and window enhancements) along freeways, expressways, and four-lane highways in order to protect adjacent noise-sensitive land uses from traffic-generated noise impacts consistent with requirements of Title 24 of the California Codes and Regulations.</i>	The project will adhere to noise mitigation measures, as discussed in 4.10 Noise. Therefore, the proposed project will comply with this measure.
<i>Measure VII.A.3:</i>	<i>Identify adequate flood control measures along roadways located within identified flood areas.</i>	The project shall be required to act in accordance with this measure as discussed in Hydrology and Water Quality (Section 4.8). Therefore, the proposed project will comply with this measure.
<i>Measure VII.A.4:</i>	<i>Control dust and mitigate other environmental impacts during all stages of roadway construction consistent with air quality regulations and mitigation measures established in environmental documents.</i>	During the construction, periodic watering for short-term stabilization of disturbed surface areas will be utilized in order to control fugitive dust. Therefore, the proposed project will comply with this measure.
<i>Measure VII.A.6:</i>	<i>Encourage the use of drought-tolerant native plants and the use of recycled water for roadway landscaping.</i>	Roadway landscaping have been developed in accordance with the City of Perris GP and Development Code 19.70. Therefore, the proposed project will comply with this measure.
<i>Policy VIII.A:</i>	<i>Encourage the use of Transportation Demand Management (TDM)/ Transportation Control Measure (TCM) strategies and programs that provide attractive, competitive alternatives to the single-occupant vehicle.</i>	As stated in Section 4.12, employees of the proposed project will be able to utilize existing bus routes as a means of alternate modes of transportation to and from work. Therefore, the proposed project is consistent with this policy.
<i>Policy VIII.B:</i>	<i>Identify Transportation Systems Management (TSM) strategies that will assist in mitigating traffic impacts and that will maintain the desired level of service along the street and highway system.</i>	Mitigation measures MM Trans 1 through MM Trans 16 prescribe how traffic impacts are to be mitigated for the development of the project. The proposed project is consistent with this policy.

<i>Policy VIII.D:</i>	<i>Support Riverside County Transportation Commission and Riverside Transit Authority educational efforts related to Transportation Demand Management (TDM) measures and transit benefits.</i>	As stated in Section 4.12, employees of the proposed project will be able to utilize existing bus routes as a means of alternate modes of transportation to and from work. Therefore, the proposed project is consistent with this policy.
<i>Measure VIII.D.1:</i>	<i>Implement the City's Transportation Control Measure (TCM) Ordinance to comply with Federal, State, regional, and local requirements.</i>	Mitigation measures MM Trans 1 through MM Trans 16 prescribe how traffic impacts are to be mitigated for the development of the project. Upon completion, the project will have complied with all applicable federal, state, regional, and local requirements. Therefore, the proposed project will comply with this measure.
<i>Measure VIII.D.3:</i>	<i>Construct traffic signals at intersection where signal warrants have been met.</i>	Mitigation measures MM Trans 1 through MM Trans 16 prescribe how traffic impacts are to be mitigated for the development of project. Therefore, the proposed project will comply with this measure.
<i>Measure VIII.D.4:</i>	<i>To optimize traffic operation, maintain spacing and operation of traffic signals as a coordinated system.</i>	The project will participate in the City's requirements for spacing and operation of traffic signals. Therefore, the proposed project will comply with this measure.
Conservation Element		
<i>Policy II.A:</i>	<i>Comply with state and federal regulations to ensure protection and preservation of significant biological resources.</i>	The project shall be required to comply with Ordinance Number 1123 adopted by the City of Perris to establish a local development mitigation fee for funding the preservation of natural ecosystems in accordance with the MSHCP. Therefore, the proposed project is consistent with this policy.
<i>Measure II.A.2:</i>	<i>Public and private projects, located in areas with potential for moderate or high plant and wildlife sensitivity, require biological surveys as part of the development review process.</i>	As discussed in Biological Resources (Section 4.4), a survey was prepared for the project site. Therefore, the proposed project will comply with this measure.
<i>Measure II.A.3:</i>	<i>For those public and private projects that are also subject to Federal or State approval with respect to impacts to Waters of the U.S. and/or Streambeds, require evidence of completion of the applicable Federal permit process prior to the issuance of a grading permit.</i>	As discussed in Biological Resources (Section 4.4), the proposed project will not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act. Therefore, the proposed project with comply with this measure.
<i>Policy III.A:</i>	<i>Review all public and private development and construction projects and any other land use plans or activities within the MSHCP area, in accordance with the conservation criteria procedures and mitigation requirements set forth in the MSHCP.</i>	Consistency and compliance with the MSHCP is discussed in detail in Biological Resources (Section 4.4). Therefore, the proposed project is consistent with this policy.

<i>Policy IV.A:</i>	<i>Comply with State and Federal regulations and ensure preservation of the significant historical, archaeological, and paleontological resources.</i>	Mitigation measures discussing impacts to historical, archaeological and paleontological resources are discussed in Cultural Resources (Section 4.5). Therefore, the proposed project is consistent with this policy.
<i>Measure IV.A.1:</i>	<i>For all private and public projects involving new construction, substantial grading, or demolition, including infrastructure and other public service facilities, staff shall require appropriate surveys and necessary site investigations in conjunction with the earliest environmental document prepared for a project.</i>	Mitigation measures discussing impacts to historical, archaeological and paleontological resources are discussed in Cultural Resources (Section 4.5). Therefore, the proposed project will comply with this measure.
<i>Measure IV.A.2:</i>	<i>For all projects subject to CEQA, applicants will be required to submit results of an archaeological records search request through the Eastern Information Center (EIC), at the University of California, Riverside.</i>	EIC results are recorded in and discussed in the CRM TECH <i>Historical/Archaeological Resources Survey Report</i> , attached as Appendix E. Therefore, the proposed project will comply with this measure.
<i>Measure IV.A.3:</i>	<i>Require Phase I Surveys for all projects located in areas that have not previously been surveyed for archaeological or historical resources, or which lie near areas where archaeological and/or historic sites have been recorded.</i>	Surveys were performed by CRM TECH and are discussed within the <i>Historical/Archaeological Resources Survey Report</i> , attached as Appendix E. Therefore, the proposed project will comply with this measure.
<i>Measure IV.A.4:</i>	<i>In Areas 4 and 5, paleontologic monitoring will be required once subsurface excavations reach five feet in depth, with monitoring levels reduced if appropriate, at the discretion of a certified Project Paleontologist.</i>	The proposed project is located within Area 4 of the Paleontological Sensitivity Map. Mitigation measures discussing impacts to paleontological resources are discussed in Cultural Resources (Section 4.5). Therefore, the proposed project will comply with this measure.
<i>Measure IV.A.5:</i>	<i>Identify and collect previous surveys of cultural resources. Evaluate such resource and consider preparation of a comprehensive citywide inventory of cultural resources including both prehistoric sites and man-made resources.</i>	A <i>Historical/Archaeological Resources Survey Report</i> was prepared by CRM Tech which includes a record of surveys that were prepared within the project boundary and a discussion of the study was included in Cultural Resources (Section 4.5). Therefore, the proposed project will comply with this measure.
<i>Policy V.A:</i>	<i>Coordinate land-planning efforts with local water purveyors.</i>	As discussed in Section 4.13 Water and Sewer, a request for a Water Source Assessment (WSA) was sent to Eastern Municipal Water District (EMWD) and was made on behalf on the proposed project by the City of Perris in order to evaluate EMWD's water supply availability. A copy of the WSA is located in Appendix K of this document. Therefore, the proposed project is consistent with this policy.

Measure V.A.1:	<i>Work with Eastern Municipal Water District to ensure that development does not outpace projections consistent with the Water District Urban Water Management Plan.</i>	The City of Perris GP requires that the City work with EMWD to ensure development does not outpace water supply consistent with EMWD's Urban Water Management Plan as discussed in Water and Sewer (Section 4.13). Therefore, the proposed project will comply with this measure.
Measure V.A.2:	<i>Require use of new technologies and water conserving plant materials for landscaping.</i>	The project is consistent with the City of Perris Development Code 19.70. Therefore, the proposed project will comply with this measure.
Policy VI.A:	<i>Comply with requirements of the National Pollutant Discharge Elimination System (NPDES).</i>	The project will be required to comply with NPDES. Therefore, the proposed project is consistent with this policy.
Measure VI.A.2:	<i>Evaluate the Planning Department's CEQA implementation procedures to ensure adequate consideration of water quality impacts and mitigation measures as part of Initial Studies/Mitigated Negative Declarations and Environmental Impact Reports.</i>	Water quality impacts and mitigation measures are discussed in Hydrology and Water Quality (Section 4.8). Therefore, the proposed project will comply with this measure.
Measure VI.A.3:	<i>Prior to issuance of any grading permit involving a disturbance of one or more acres of land, require proof of a RWQCB San Jacinto Watershed Construction Activities Permit and a Storm Water Pollution Prevention Plan.</i>	In order to reduce the discharge of pollutants into receiving waters during construction of the proposed development, the proposed project proponent will be required to prepare a site-specific SWPPP, as discussed in Hydrology & Water Quality (Section 4.8). Therefore, the proposed project will comply with this measure.
Measure VI.A.4:	<i>Review water quality impacts during the project review and approval phases to ensure appropriate BMPs are incorporated into the proposed project design and long-term operations.</i>	As discussed in Hydrology & Water Quality (Section 4.8), the General Permit requires a development and implementation of a site-specific SWPPP to identify an effective combination of erosion control and sediment control best management practices (BMPs) to minimize or eliminate the discharge of pollutants into receiving waters. In addition, BMPs for managing sources of non-storm water discharges and waste are required to be identified in the SWPPP. Therefore, the proposed project will comply with this measure.
Measure VI.A.5:	<i>In accordance with the Riverside County NPDES, enact a Water Quality Management Plan to review and regulate new development approvals.</i>	As discussed in Hydrology & Water Quality (Section 4.8), the project prepared a Water Quality Management Plan which was submitted to the City of Perris Engineering Department for approval. Therefore, the proposed project will comply with this measure.
Policy VIII.A:	<i>Adopt and maintain development regulations that encourage water and resource conservation.</i>	The project is in compliance with City of Perris Development Code 19.70. Therefore, the proposed project is consistent with this policy.
Measure VIII.A.1:	<i>Use indigenous and/or drought-resistant planting materials and efficient irrigation systems within residential projects as a means of reducing water demand, including smart irrigation systems.</i>	The project is in compliance with City of Perris Development Code 19.70. Therefore, the proposed project will comply with this measure.

<i>Measure VIII.A.2:</i>	<i>Use indigenous and/or drought-resistant planting and efficient irrigation systems in all new and refurbished commercial and industrial development projects. Also, restrict use of turf to 25% or less of the landscaped areas.</i>	The project is in compliance with City of Perris Development Code 19.70. Therefore, the proposed project will comply with this measure.
<i>Measure VIII.A.4:</i>	<i>Use gray water, water conserving appliances and fixtures within all new commercial and industrial developments.</i>	As discussed in Section 4.3 Air Quality, the project is going to adopt several LEED practices, with the potential of gray water. Therefore, the proposed project will comply with this measure.
<i>Measure VIII.A.5:</i>	<i>Use permeable paving materials within proposed developments to deter water runoff and promote natural filtering of precipitation and irrigation waters.</i>	As discussed in Section 4.3 Air Quality, the project is going to adopt several LEED practices, with the potential of gray water. Therefore, the proposed project will comply with this measure.
<i>Measure VIII.A.8:</i>	<i>Explore the use of private water well systems for all potable and/or landscaping water use for larger commercial and industrial projects.</i>	The project will connect to water and sewer lines as is discussed in the Water and Sewer Section of the Draft EIR (Section 4.13). A private water well system is not feasible for this project site. Therefore, this measure is not applicable to the proposed project.
<i>Policy VIII.B:</i>	<i>Adopt and maintain development regulations that encourage recycling and reduced waste generation by construction projects.</i>	As discussed in Section 4.3 Air Quality, the project is going to adopt several LEED practices, with the potential of a recycling program. Therefore, the proposed project is consistent with this policy.
<i>Measure VIII.B.3:</i>	<i>Require the installation of recycling bins and provide space for storage and collection of recyclables within development sites.</i>	As discussed in Section 4.3 Air Quality, the project is going to adopt several LEED practices, with the potential of a recycling program. Therefore, this measure is not applicable to the proposed project.
<i>Policy VIII.C:</i>	<i>Adopt and maintain development regulations which encourage increased energy efficiency in buildings, and the design of durable buildings that are efficient and economical to own and operate. Encourage green building development by establishing density bonuses, expedited permitting, and possible tax deduction incentives to be made available for developers who meet LEED building standards for new and refurbished developments (U.S. Green Building Council's Leadership in Energy and Environmental Design green building programs).</i>	As discussed in Section 4.3 Air Quality, the project is going to adopt several LEED practices, with the potential of a recycling program. Therefore, the proposed project will comply with this policy.
<i>Measure VIII.C.5:</i>	<i>Encourage green building density bonuses, expedited permitting, and possible tax deduction incentives to be made available for developers who meet LEED building standards for new developments.</i>	As discussed in Section 4.3 Air Quality, the project is going to adopt several LEED practices, with the potential of a recycling program. Therefore, the proposed project will comply with this measure.

<i>Policy IX.A:</i>	<i>Encourage land uses and new development that support alternatives to the single occupant vehicle.</i>	The proposed project's land use designation is consistent with that envisioned in the City's General Plan and the project is served by existing bus routes as a means of alternate modes of transportation to and from work. Therefore, the proposed project is consistent with this policy.
<i>Measure IX.A.1:</i>	<i>Encourage installation of shared vehicle transportation facilities and support within new and refurbished commercial and industrial developments (examples: dual fuel vehicles and charging systems on site, car pool parking, and bus stop shelters).</i>	The proposed project would result in the development of employment opportunities in close proximity to existing residential development. In addition, the proposed project will include sidewalks and landscaping treatments to provide for pedestrian access throughout the proposed project site. The type of uses proposed and their proximity to each other allow for increased pedestrian and bicycle activity, limiting the need for vehicle travel. Therefore, the proposed project is consistent with this measure.
<i>Measure IX.A.2:</i>	<i>Install bicycle paths and create secure and accessible bicycle storage for visitors and occupants within new and refurbished commercial and industrial developments.</i>	The project will adhere to City of Perris Development Codes. Therefore, the proposed project will comply with this measure.
<i>Measure IX.A.4:</i>	<i>Encourage building and site designs that facilitate pedestrian activity (i.e., locating buildings close to the street and providing direct connections to public walkways and neighboring land uses).</i>	The project encourages walkability through placement of buildings and pedestrian circulation facilities and pathways to public walks. Therefore, the proposed project is will comply with this measure.
<i>Measure IX.A.5:</i>	<i>The City shall require all new public and private development to include bike and walking paths wherever feasible.</i>	The project will require bike and walking paths where feasible in accordance with City of Perris Development Codes. Therefore, the proposed project is will comply with this measure.
<i>Measure IX.A.6</i>	<i>The City shall purposely design interconnections between existing and proposed bicycle and walking paths, and trails throughout the city.</i>	The project require bike, walking paths and trails where feasible in accordance with City of Perris Development Codes. Therefore, the proposed project will comply with this measure.
<i>Policy X.A:</i>	<i>Establish density bonuses, expedited permitting, and possible tax deduction incentives to be made available for developers who exceed current Title 24 requirements for new development.</i>	This policy is a City responsibility. However, as discussed in Section 4.3 Air Quality, the project is going to adopt several LEED practices and implement mitigation measure MM Air 15 which requires the project to exceed current Title 24 energy standards. Therefore, the proposed project will comply with this measure.
<i>Measure X.A.2:</i>	<i>Encourage energy conservation devices including but not limited to lighting, water heater treatments, solar energy systems, etc. for all residential projects.</i>	As discussed in Section 4.3 Air Quality, the project is going to adopt several LEED practices, with the potential of energy conservation devices. Therefore, the proposed project will comply with this measure.
<i>Policy X.B:</i>	<i>Encourage the use of trees within project design to lessen energy needs, reduce the urban heat island effect, and improve air quality throughout the region.</i>	As discussed in Section 4.3 Air Quality, the project is going to adopt several LEED practices. Therefore, the proposed project is consistent with this policy.

<i>Policy X.C:</i>	<i>Encourage strategic shape and placement of new structures within new commercial and industrial projects.</i>	As discussed in Section 4.3 Air Quality, the project is going to adopt several LEED practices. Therefore, the proposed project is consistent with this policy.
<i>Measure X.C.1:</i>	<i>Promote energy conservation by taking advantage of natural site features such as natural lighting and ventilation, sunlight, shade and topography during the site plan process.</i>	As discussed in Section 4.3 Air Quality, the project is going to adopt several LEED practices. Therefore, the proposed project is consistent with this policy.
<i>Measure X.C.2:</i>	<i>When possible, locate driveways and parking on the east and north sides of the buildings to reduce heat buildup during hot afternoons.</i>	As discussed in Section 4.3 Air Quality, the project is going to adopt several LEED practices. Therefore, the proposed project is consistent with this policy.
<i>Policy XI.A:</i>	<i>The City shall support LEED development standards and gray water usage for all new and refurbished public buildings and facilities. All projects undertaken by the City, or that receive funding from the City or the Redevelopment Agency should be encouraged to utilize green building practices.</i>	As discussed in Section 4.3 Air Quality, the project is going to adopt several LEED practices. Therefore, the proposed project is consistent with this policy.
<i>Policy XI.C:</i>	<i>The City shall encourage Green Building and Sustainable Community actions whenever possible through subsidy funding.</i>	As discussed in Section 4.3 Air Quality, the project is going to adopt several LEED practices. Therefore, the proposed project is consistent with this policy.
Land Use Element		
<i>Policy II.A:</i>	<i>Require new development to pay its full, fair-share of infrastructure costs.</i>	The project will be required to pay development impact fees and/or construct required infrastructure to service the development site Therefore, the proposed project is consistent with this policy.
<i>Policy II.B</i>	<i>Require new development to include school facilities or pay school impact fees, where appropriate.</i>	The project will be required to pay state mandated school impact fees. Therefore, the proposed project is consistent with this policy.

<i>Policy III.A:</i>	<i>Accommodate diversity in the local economy.</i>	<p>According to the City of Perris GP, Planning Area 3 consists of large tracts of land currently used for agriculture. Proximity to the Interstate 215 corridor suggests conversion of agricultural land, over the long term, to uses that are compatible with surrounding commercial and industrial uses. Conversion could enhance the economy of the City by attracting new uses that complement the existing Lowe's and Ross distribution centers and provide jobs for local residents. Nearby residential development may support some level of retail uses in this planning area. This area contains land currently under agricultural cultivation. While the zoning code includes an Agricultural zoning designation, there is no corresponding agricultural land use designation in the City's General Plan. These agricultural lands could be converted to uses that generate revenue and create jobs within the City.</p> <p>The project is consistent with the goals for Planning Areas 3 converting agricultural land to light industrial surrounding light industrial, general industrial, business park and commercial development, and creating additional jobs for surrounding residential development. This project will be compatible with no significant adverse impacts to the applicable policy set forth in the City of Perris GP. Therefore, the proposed project is consistent with this policy.</p>
<i>Measure III.A.1:</i>	<i>Rezone properties to be consistent with the land use map.</i>	By changing the existing zoning designation from "Light Agricultural" to a zoning designation ("Light Industrial") that is compatible with the surrounding land uses will also creates consistencies between the General Plan and Zoning Code. Therefore, the proposed project will comply with this measure.
<i>Policy IV.A:</i>	<i>The General Plan and the Zoning Code shall be revised and updated to maintain consistency with each other, and with regional plans.</i>	By changing the existing zoning designation from "Light Agricultural" to a zoning designation ("Light Industrial") that is compatible with the surrounding land uses will also creates consistencies between the General Plan and Zoning Code. Therefore, the proposed project will comply with this measure.
<i>Measure IV.A.1:</i>	<i>Change the zoning Code and zoning Map to ensure consistency with the Land Use Plan.</i>	By changing the existing zoning designation from "Light Agricultural" to a zoning designation ("Light Industrial") that is compatible with the surrounding land uses will also creates consistencies between the General Plan and Zoning Code. Therefore, the proposed project will comply with this measure.

<i>Policy V.A:</i>	<i>Restrict development in areas at risk of damage due to disasters</i>	The General Plan hazards maps were consulted in the preparation of the Initial Study/NOP (Appendix A) in order to determine whether potential impacts may occur from the proposed project. Where hazards maps indicated that impacts may be significant, impacts were further evaluated in Hazards (Section 4.7) and Hydrology and Water Quality (Section 4.8). Therefore, the proposed project will comply with this measure.
<i>Measure V.A.1:</i>	<i>Consult hazards maps as part of the review process for all development applications.</i>	The General Plan hazards maps were consulted in the preparation of the Initial Study/ NOP (Appendix A) in order to determine whether potential impacts may occur from the proposed project. Where hazards maps indicated that impacts may be significant, impacts were further evaluated in Hazards (Section 4.7) and Hydrology and Water Quality (Section 4.8). Therefore, the proposed project will comply with this measure.
Noise Element		
<i>Policy I.A:</i>	<i>The State of California Noise/Land Use Compatibility Criteria shall be used in determining land use compatibility for new development.</i>	The State of California Noise/Land Use Compatibility Criteria was utilized in analyzing potential noise impacts, as discussed in Noise (Section 4.10). Therefore, the proposed project is consistent with this policy.
<i>Measure I.A.1:</i>	<i>All new development proposals will be evaluated with respect to the State Noise/Land Use Compatibility Criteria. Placement of noise-sensitive uses will be discouraged within any area exposed to exterior noise levels that fall into the “Normally Unacceptable” range and prohibited within areas exposed to “Clearly Unacceptable” noise ranges.</i>	Noise impacts from the project were analyzed in an Acoustical Study and summarized and discussed in Section 4.10 Noise. Therefore, the proposed project will comply with this measure.
<i>Measure I.A.3:</i>	<i>Acoustical studies shall be prepared for all new development proposals involving noise sensitive land uses, as defined in Section 16.22.020J of the Perris Municipal Code, where such projects are adjacent to roadways and within existing or projected roadway CNEL levels of 60 dBA or greater.</i>	Noise impacts from the project were analyzed in an Acoustical Study and summarized and discussed in Section 4.10 Noise. Therefore, the proposed project will comply with this measure.
<i>Measure I.A.4:</i>	<i>As part of any approvals of noise sensitive projects where reduction of exterior noise to 65 dBA is not reasonably feasible, the City will require the developer to issue disclosure statements to be identified on all real estate transfers associated with the affected property that identifies regular exposure to roadway noise.</i>	Noise impacts from the project were analyzed in an Acoustical Study and summarized and discussed in Section 4.10 Noise. Therefore, the proposed project will comply with this measure.

Measure I.A.5:	<i>As part of any approvals of noise sensitive projects where reduction of exterior noise to 65 dBA is not reasonably feasible, the City will require the developer to issue disclosure statements to be identified on all real estate transfers associated with the affected property that identifies regular exposure to roadway noise.</i>	Noise impacts from the project were analyzed in an Acoustical Study and summarized and discussed in Section 4.10 Noise. Therefore, the proposed project will comply with this measure.
Policy II.A:	<i>Appropriate measures shall be taken in the design phase of future roadway widening projects to minimize impacts on existing noise-sensitive receptors.</i>	The project shall be required to act in accordance with this measure as discussed in Noise (Section 4.10). Therefore, the proposed project is consistent with this policy.
Policy V.A:	<i>New large scale commercial or industrial facilities located within 160 feet of sensitive land uses shall mitigate noise impacts to attain an acceptable level as required by the State of California Noise/Land Use Compatibility Criteria.</i>	Although this project involves the construction of a new large scale industrial facility, it is not located within 160 feet of sensitive land uses. The nearest sensitive receptor is located approximately 1,379 feet south of the project site. Therefore, the proposed project is consistent with this policy.
Measure V.A.1:	<i>An acoustical impact analysis shall be prepared for new industrial and large scale commercial facilities to be constructed within 160 feet of the property line of any existing noise sensitive land use. This analysis shall document the nature of the commercial or industrial facility as well as all interior or exterior facility operations that would generate exterior noise. The analysis shall document the placement of any existing or proposed noise-sensitive land uses situated within the 160-foot distance. The analysis shall determine the potential noise levels that could be received at these sensitive land uses and specify specific measures to be employed by the large scale commercial or industrial facility to ensure that these levels do not exceed 60 dBA CNEL at the property line of the adjoining sensitive land use. No development permits or approval of land use applications shall be issued until the acoustic analysis is received and approved by the City Staff.</i>	Although this project involves the construction of a new large scale industrial facility, it is not located within 160 feet of sensitive land uses. The nearest sensitive receptor is located approximately 1,379 feet south of the project site. Therefore, the proposed project is consistent with this policy.
Safety Element		
Policy I.B:	<i>The City of Perris shall restrict future development in areas of high flood hazard until it can be shown that risk is or can be mitigated</i>	As stated in the Initial Study/NOP (Appendix A), the project is outside of the 100-year flood hazard area. Therefore, the proposed project is consistent with this policy.

<i>Measure I.B.5:</i>	<i>Require flood mitigation plans for all proposed projects in the 100 year floodplain (Areas A and AE).</i>	The project will be required to act in accordance with this measure as discussed in Hydrology and Water Quality (Section 4.8). Therefore, the proposed project will comply with this measure.
<i>Policy I.C:</i>	<i>Reduce the risk of damage from fires.</i>	The project shall be required to consider building placement per the City's development code and the California Building Codes, thus reducing the risk of damages that could be caused by fire. Therefore, the proposed project is consistent with this policy.
<i>Measure I.C.2:</i>	<i>Adopt landscaping standards to include a fire-resistant plant palette, where appropriate.</i>	The project will be in compliance with City of Perris Development Code 19.70. Therefore, the proposed project will comply with this measure.
<i>Measure I.C.3:</i>	<i>Enforce current California Building Code standards to exclude the use of materials that pose a fire risk such as untreated wood roofing materials.</i>	The project will be required to receive approval of construction plans which will be reviewed for compliance with the current California Building Code (International Building Code). Therefore, the proposed project will comply with this measure.
<i>Measure I.C.5:</i>	<i>Maintain appropriate setback requirements in the Zoning Code for new development or redevelopment to prevent spread of fire.</i>	All proposed on-site structures are setback appropriately to the Zoning Code regulations. During plan check, the construction method and materials will be designated by building separation as defined in the City of Perris building codes. Therefore, the proposed project will comply with this measure.
<i>Policy I.D:</i>	<i>Consult the AICUZ Land Use Compatibility Guidelines and ALUP Airport Influence Area development restrictions when considering development project applications.</i>	As discussed in Section 4.2, the project was evaluated against the 2005 AICUZ, the 1984 ALUP, and the 1986 Airport Influence Area Map. Therefore, the proposed project will comply with this measure.
<i>Policy I.E:</i>	<i>Seismic Hazards-All development will be required to include adequate protection from damage due to seismic incidents.</i>	The project will be required to receive approval of construction plans which will be reviewed for compliance with the current California Building Code (International Building Code) – which addresses seismic concerns. Therefore, the proposed project is consistent with this policy.
<i>Measure I.E.1:</i>	<i>Require geological and geotechnical investigations by State-licensed professionals, in areas with potential for earthquake-induced liquefaction, landsliding, other slope instability, or settlement as part of the environmental and development review process.</i>	The project will be required to receive approval of construction plans which will be reviewed for compliance with the current California Building Code (International Building Code) – which addresses seismic concerns. Therefore, the proposed project will comply with this measure.
<i>Policy II.A:</i>	<i>The City shall require roadway improvements to expedite quick and safe travel by emergency responders.</i>	The project will comply with the City of Perris Development Codes to designate fire access drive aisles designed to meet the City's standards of emergency responders. Therefore, the proposed project is consistent with this policy.

According to the City of Perris General Plan, Planning Area 3 consists of large tracts of land currently used for agriculture. Proximity to the Interstate 215 corridor suggests conversion of agricultural land, over the long term, to uses that are compatible with surrounding commercial and industrial uses. Conversion could enhance the economy of the City by attracting new uses that complement the existing Lowe's and Ross distribution centers and provide jobs for local residents. Nearby residential development may support some level of retail uses in this planning area. This area contains land currently under agricultural cultivation. While the zoning code includes an Agricultural zoning designation, there is no corresponding agricultural land use designation in the City's General Plan. These agricultural lands could be converted to uses that generate revenue and create jobs within the City. The proposed project is consistent with the goals for Planning Area 3, converting agricultural land to a light industrial distribution center, complementing surrounding light industrial development, and creating additional jobs for surrounding residential development. This project will be compatible with no significant adverse impacts to the applicable policy set forth in the City of Perris General Plan.

The project is proposed a change to the existing light agricultural zoning on the project site, to match the General Plan light industrial land use designation. This change of zone will be compatible with no significant adverse impacts to the applicable policy and land use designations set forth in the City of Perris General Plan.

The project area currently consists of agricultural-zoned land that represents 42% of the City's agricultural zoning, although there is no agricultural land use designation in the General Plan. The largest land use designation within Planning Area 3 is Light Industrial. The General Plan plans to expand the light industrial and commercial land uses due to the close proximity to Interstate 215, a cargo airport, rail lines, and other commercial and industrial land uses. Conversion of agricultural land to light industrial and commercial uses is compatible with surrounding land uses and consistent with the General Plan with the intention of promoting economic growth within an undeveloped area in the City of Perris.

The General Plan land use designations for the project property are Light Industrial and Public/Semi-Public Facilities/Utilities. These designations allow limited assembly and packaging operations, self-storage warehouses, distribution centers, and business-to-business retail operations. The minimum lot size for this land use is 10,000 square feet. The project is proposing a 1,191,080 square foot distribution center, which falls within the requirements of the General Plan land use designation for Light Industrial.

The current zoning for the project site is A1 (Light Agriculture), which is inconsistent with the General Plan Land Use Designations of Light Industrial and Public/Semi-Public Facilities/Utilities. The project includes a Change of Zone from A1 (Light Agricultural) to LI (Light Industrial) which would be consistent with the General Plan, and General Plan Policy IV.A, to make the General Plan and zoning consistent with each other. Therefore, the proposed project is considered to be consistent with the Land Use Plan set forth in the General Plan. Once the Change of Zone is approved, the project will be consistent with the proposed zoning and development standards established for the project. With the approval of the project, the project will have **less than significant** impacts without any further need for mitigation, regulatory

compliance, or design considerations. Also, the project is considered to have **less than significant** impacts related to land use policies.

Regional Plans

Air Quality Management Plan

Air Quality (Section 4.3) of this Draft EIR, examines the proposed project's consistency with the adopted AQMP. Since the project will be developed with land uses that are in accordance with the approved general plan land use designations of Light Industrial and Public/Semi-Public Utilities, the project is also considered to be in compliance with the AQMP and **impacts are considered to be less than significant**. Therefore, the proposed project is consistent with the AQMP.

Regional Comprehensive Plan

SCAG's Final 2008 Regional Comprehensive Plan (RCP) adopted in October 2008 has ten chapters with each chapter based on a specific area of planning or resource management. The document is described as a regional policy framework for future land use decisions in Riverside County that respects the need for strong local control, but that also recognizes the importance of regional comprehensive planning for issues of regional significance.

SCAG Regional Growth Forecasts

The SCAG 2008 RTP Growth Forecast projects a Year 2035 population of 2,550,865 persons within the Western Riverside County Subregion. The Subregion area comprises the cities of Banning, Beaumont, Calimesa, Canyon Lake, Corona, Hemet, Lake Elsinore, Moreno Valley, Murrieta, Norco, Perris, Riverside, San Jacinto, and Temecula, as well as unincorporated Riverside County. **Table 4.9-B, SCAG Western Riverside County Subregion Forecasts**, reflects SCAG's population forecasts for the entire Western Riverside County Subregion.

Table 4.9-B, SCAG Western Riverside County Subregion Forecasts

	2015	2020	2025	2030	2035
Population	1,918,962	2,096,539	2,262,989	2,414,254	2,550,865
Households	609,218	671,932	727,620	780,741	828,545
Employment	691,260	797,626	901,163	1,005,923	1,098,233

These forecasts have been broken down to separate growth within the cities from that in the unincorporated areas. **Table 4.9-C, SCAG City of Perris Forecasts**, depicts SCAG population, household, and employment forecasts for the City of Perris, which includes the proposed project site.

Table 4.9-C, SCAG City of Perris Forecasts

	2015	2020	2025	2030	2035
Population	64,220	71,468	78,671	84,881	90,951
Households	16,789	18,357	20,188	21,988	23,825
Employment	19,300	20,315	22,690	25,370	27,671

Employment/Housing Balance Policies

SCAG's April 2001 report titled, *The New Economy and Jobs/Housing Balance in Southern California*, states that "a balance between jobs and housing in a metropolitan region can be defined as a provision of an adequate supply of housing to house workers employed in a defined area (i.e., community or subregion). Alternately, a jobs/housing balance can be defined as an adequate provision of employment in a defined area that generates enough local workers to fill the housing supply." The SCAG region as a whole is, by definition, balanced. The SCAG region as a whole is projected to have 1.33 jobs per housing unit in 2035 under SCAG's 2008 RTP Growth Forecast.

The proposed project intends to establish a development area for a light industrial project, which will bring an additional 1,156 jobs/employees to the area. SCAG's, *The New Economy and Jobs/Housing Balance in Southern California*, further defines jobs/housing balance for this region as an area extending about 14 miles around an employment center with a ratio between jobs and household on the order of 1.0 - 1.29 jobs per household. The proposed project will provide employment opportunities for residents within the same local region, thereby contributing to an overall jobs/housing balance. Therefore, the proposed project is consistent with regional growth forecasts and regional jobs/housing balance projections.

Project/Regional Growth Forecast Comparative Analysis

The project applicant is proposing approximately 1,191,080 square feet of light industrial development. A breakdown of the development maximum potential and the land use is set forth in **Table 4.9-D, Development Intensity and Employee Projections**. Appendix E, *Buildout Assumptions & Methodology*, of the RCIP General Plan EIR identifies employment generation factor of (1) one employee per 1,030 square feet of light industrial floor space. This project is projected to create jobs for an estimated 1,156 employees.

Table 4.9-D, Development Intensity and Employee Projections

Development Type	Acres	Employee/SQ. FT. factor	Floor Area Ratio	Building Square Footages	Employees per Development Ratios
			Proposed	Proposed	Proposed
Light Industrial	61.63	1,030**	n/a	1,191,080	1,156.4

* Floor Area Ratio is the gross building area of all floors divided by the lot area, from City of Perris General Plan June 14, 2005.

** Data from Riverside County General Plan EIR Appendix E.

The creation of 1,156 new jobs comprises 5.9 percent of the forecasted employment for the City in 2015 and 4.2 percent in 2035. For the Western Riverside County Subregion, the project will constitute .2 percent of the forecasted employment in 2015 and 0.1 percent in 2035.

The jobs/housing ratio for Western Riverside County is projected to be 1.13 in 2015, 1.19 in 2020, 1.24 in 2025, 1.29 in 2030 and 1.33 in 2035. Therefore, Western Riverside County is projected to be a jobs/housing balanced area. The jobs/housing ratio for the City of Perris is projected to be 1.15 in 2015, 1.11 in 2020, 1.12 in 2025, 1.15 in 2030 and 1.16 in 2035. Therefore, the City of Perris is also a jobs/housing balanced area. By implementation of the proposed project, the City will further improve the jobs/housing balance.

Even though the proposed project is located within a jobs/housing balanced area, it still provides the opportunity to create additional jobs that will help further balance the ratio between jobs and households. The project will provide employment and service opportunities for residents within the same local region, thereby contributing to an overall jobs/housing balance, and in effect, lessening the expanding market by limiting the need for residents to leave the areas for these opportunities. Therefore, the proposed project is consistent with regional growth forecasts and regional jobs/housing balance projections.

Regional Plans affecting the project are the SCAG Regional Comprehensive Plan and Guide (RCPG) Policies. The project's consistency with these policies is discussed in **Table 4.9-E, Consistency with Regional Plans.**

Table 4.9-E, Consistency with Regional Plans

REGIONAL PLAN POLICY	PROJECT CONSISTENCY WITH REGIONAL PLAN POLICY
<i>RCPG Growth Management Chapter (GMC) Policy 3.01 – The population, housing, and jobs forecasts, which are adopted by SCAG’s Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review.</i>	The project site is designated as “Light Industrial” by the City of Perris General Plan. SCAG's population, housing, and jobs forecasts reflect local plans and policies, and therefore, reflect the land use designations of the adopted General Plan. Uses within the project are expected to generate 1,156 additional jobs. These additional jobs support the achievement of the jobs forecast, as adopted by SCAG’s Regional Council.
<i>GMC Policy 3.03 – The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.</i>	The timing of other public facilities, utility systems, and transportation systems within the area is determined by the public agencies providing those services. The proposed project is required to construct or pay “fair share” fees to finance the construction of infrastructure and public facilities needed to serve the project. Nevertheless, GMC Policy 3.03 places a requirement upon SCAG to implement the region’s growth policies and for this reason, GMC Policy 3.03 is not considered to be applicable to individual development projects such as the proposed project.
<i>GMC Policy 3.05 – Encourage patterns of urban development and land use, which reduce costs on infrastructure construction and makes better use of existing facilities.</i>	The proposed project is within an area that has been planned for light industrial land uses since the adoption of the City of Perris General Plan. There is existing infrastructure such as roads, water, sewer and storm drain infrastructure within the area, but some infrastructure will need to be constructed per EMWD’s Sewer and Water Master Plan to serve this rapidly developing area. These infrastructure elements will be extended into the project site as a condition of its development. Therefore, the project is considered to be consistent with GMC Policy 3.05.
<i>GMC Policy 3.09 – Support local jurisdictions’ efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.</i>	The project site is or will be served by existing and proposed roads, water and sewer lines and other infrastructure. Extensions of these facilities will be constructed by the project proponent or paid for through the “fair share” fees paid by the project and other development within the surrounding area. Therefore, the project is considered to be consistent with this policy.
<i>GMC Policy 3.10 – Support local jurisdictions’ actions to minimize red tape and expedite the permitting process to maintain economic viability and competitiveness.</i>	The proposed project is a development proposal that is consistent with the City of Perris General Plan land use designation. No additional entitlement approvals will be required if the proposed project is approved. For this reason, GMC Policy 3.10 is considered to be not applicable to the Perris Distribution Center.
<i>GMC Policy 3.12 – Encourage existing or proposed local jurisdictions’ programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.</i>	To encourage alternative modes of transportation and to be consistent with the City of Perris General Plan policies, the proposed project will be served by RTA routes 19 and 41.

REGIONAL PLAN POLICY	PROJECT CONSISTENCY WITH REGIONAL PLAN POLICY
GMC Policy 3.14 – Support local plans to increase density of future development located at strategic points along the regional commuter rail, transit systems, and activity centers.	The project site is not located at a strategic point along a regional commuter rail transit system. Metrolink plans to extend its service between the cities of Riverside and Perris by 2008-2010. Therefore, the project is considered to be consistent with this policy.
GMC Policy 3.18 – Encourage planned development in locations least likely to cause environmental impact.	The project site is designated as “Light Industrial” by the City of Perris General Plan. The potential environmental impacts of development pursuant to the General Plan were evaluated through preparation of an Environmental Impact Report. The General Plan determined the suitability of property within the City for the designated development intensities. The proposed project does not propose any additional development that is not anticipated within the General Plan. Therefore, this project is consistent with the project site’s General Plan land use designation and considered to be consistent with GMC Policy 3.18.
GMC Policy 3.20 – Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals.	The project site has historically been used for agricultural uses and minimal opportunity remains for the property to contain vital resources. Section 4.4 of this DEIR discusses potential impacts upon biological resources. This section discusses potential impacts to endangered plants and animals and the potential for impacts to wetlands. All potential impacts to biological resources can be mitigated to below the level of significance. Therefore, the proposed project is consistent with GMC Policy 3.20.
GMC Policy 3.21 – Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.	Potential impacts to cultural resources and archaeological sites are addressed in detail in Section 4.5 of this DEIR. The project site was surveyed for cultural resources. Following implementation of the mitigation measures set forth in Section 4.5, potential impacts to any known cultural resources and any unknown cultural resources accidentally discovered during grading will be reduced to below the level of significance. Through implementation of the mitigation measures, proposed project will be consistent with GMC Policy 3.21.
GMC Policy 3.22 – Discourage development, or encourage the use of special design requirements, in areas of steep slopes, high fire, flood, and seismic hazards.	The Rados Distribution Center site is not located within an area that is subject to high fire, flood, or seismic hazards. The site is characterized by topography with no steep slopes and no significant or unique surface features. Therefore, the proposed project is consistent with GMC Policy 3.22.
GMC Policy 3.23 – Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans.	The proposed project site will generate additional truck traffic which will create noise impacts. Potential project-related impacts to noise are addressed in detail in Section 4.10 of this DEIR. Biological and ecological resources are discussed in Section 4.4 (Biological Resources) and Section 4.6 (Geology and Soils) of this DEIR. All feasible mitigation measures related to these issues are set forth in those sections and will be implemented during development of the proposed project. Therefore, the proposed project is consistent with GMC Policy 3.23.

REGIONAL PLAN POLICY	PROJECT CONSISTENCY WITH REGIONAL PLAN POLICY
GMC Policy 3.27 – <i>Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as: public education, housing, health care, social services, recreational facilities, law enforcement, and fire protection.</i>	Community services such as public education, health care, social services, law enforcement, and fire protection are provided by local agencies and beyond the scope of the proposed project, although “fair share” fees for these services will be paid by the project pursuant to City requirements. The project will not generate a need for recreational facilities and therefore, does not include park sites. The proposed project is considered to be consistent with GMC Policy 3.27.
<p>RTP Policy 4.01 – <i>Transportation investments shall be based on SCAG's adopted Regional Performance Indicators.</i></p> <p><u>Mobility</u> – <i>Transportation systems should meet the public need for improved access, and for safe, comfortable, convenient, faster, and economical movements of people and goods.</i></p> <p><u>Accessibility</u> – <i>Transportation systems should ensure the ease with which opportunities are reached. Transportation and land use measures should be employed to ensure minimal time and cost.</i></p> <p><u>Environment</u> – <i>Transportation systems should sustain development and preservation the existing system and the environment.</i></p> <p><u>Reliability</u> – <i>Transportation systems should have reasonable and dependable levels of service by mode.</i></p> <p><u>Safety</u> – <i>Transportation systems should provide minimal accident, death, and injury.</i></p> <p><u>Equity/Environmental Justice</u> – <i>The benefits of transportation investments should be equitably distributed among the ethnic, age, and income groups.</i></p> <p><u>Cost-Effectiveness</u> – <i>Maximize return on transportation investment (all trips). Air Quality, Mobility, Accessibility, and Safety.</i></p>	<p>The proposed project is not a transportation improvement project and will not establish a new transportation system nor create significant changes to the existing transportation system.</p> <p>The proposed project will support the <i>Mobility</i> and <i>Accessibility</i> objectives by: improving or maintaining a Level of Service (LOS) C/D or better during the peak traffic hours; improving and widening all roadways bordering the site to the ultimate half-section widths.</p> <p>Project-related impacts upon traffic and transportation are discussed in Section 4.13 of this DEIR. The mitigation measures, set forth in that section require specified improvements to the local transportation network, in order to reduce potential impacts to below the level of significance.</p> <p>The proposed project has the potential to increase the LOS levels at some intersections. However, the project proponent is contributing to a fair share fund to improve the existing conditions at several area intersections.</p> <p>Project development will result in on and off-site road improvements that will benefit persons, of all social and economic groups, who utilize these roads. Road improvements meet established design requirements for public safety.</p> <p>The proposed project is consistent with RTP Policy 4.01</p>
RTP Policy 4.02 – <i>Transportation investments shall mitigate environmental impacts to an acceptable level.</i>	<p>Project-related impacts upon traffic and transportation are discussed in Section 4.13 of this DEIR. The mitigation measures set forth in that section require specified improvements to the local transportation network.</p> <p>Implementation of these mitigation measures reduces potential impacts to below the level of significance. Therefore, the proposed project is considered to be consistent with this policy.</p>

REGIONAL PLAN POLICY	PROJECT CONSISTENCY WITH REGIONAL PLAN POLICY
<i>RTP Policy 4.04 – Transportation Control Measures shall be a priority.</i>	Project-related impacts upon traffic and transportation are discussed in Section 4.13 of the Draft EIR. The mitigation measures set forth in that section require the proposed project developer to contribute its fair share to required transportation control measures. Therefore, the project is considered consistent with this policy.
<i>RTP Policy 4.16 – Maintaining and operating the existing transportation system will be a priority over expanding capacity.</i>	<p>The proposed project is not a transportation improvement project and will not establish a new transportation system nor create significant changes to the existing transportation system.</p> <p>Project-related impacts upon traffic and transportation are discussed in Section 4.13 of this DEIR. The mitigation measures, set forth in that section, require specified improvements to the local transportation network in order to reduce potential impacts to below the level of significance.</p> <p>Therefore, the proposed project is considered to be consistent with RTP Policy 4.16.</p>
<i>GMC Air Quality Chapter Action 5.07 – Determine specific programs and associated actions needed (e.g., indirect source rules, enhanced use of telecommunication, provision of community-based shuttle services, provision of demand management based programs, or vehicle-miles-traveled/emission fees) so that options to command and control regulations can be assessed.</i>	The establishment of new programs and associated actions to create options to SCAG’s command and control regulations is the responsibility of SCAG and beyond the scope of this project. For this reason, GMC Air Quality Chapter Action 5.07 not considered to be applicable to the proposed project.
<i>GMC Air Quality Chapter Action 5.11 – Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, Subregional, and local) consider air quality, land use, transportation, and economic relationships to ensure consistency and minimize conflicts.</i>	Potential impacts to land use and planning issues are discussed in Section 4.9 of this DEIR. This DEIR considers potential project-related impacts to air quality (Section 4.3), and transportation (Section 4.13), as well as other potentially significant impacts. It is prepared and processed pursuant to the California Environmental Quality Act, known as CEQA, (California Public Resources Code, Sections 21000 <u>et seq.</u>), the CEQA Guidelines (California Code of Regulations, Sections 15000 <u>et seq.</u>), and City of Perris local guidelines for implementing CEQA. The environmental document review process set forth in these regulations have been complied with and will ensure the opportunity for review and comment by all appropriate levels of government. The proposed project and its related-EIR are consistent with GMC Air Quality Chapter Action 5.11.
<i>GMC Water Quality Chapter Recommendation and Policy 11.07 – Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.</i>	The proposed project is not typically considered a large generator of wastewater. Water treatment and service will be provided by Eastern Municipal Water District (EMWD). This project would not affect or obstruct any EMWD goals and policies regarding reclaimed water. Pursuant to the provisions of EMWD Ordinance 72.22, the district has the power to require the use of recycled water instead of potable water for landscape irrigation purposes for new industrial accounts. Therefore, the proposed project is consistent with this policy.

REGIONAL PLAN POLICY	PROJECT CONSISTENCY WITH REGIONAL PLAN POLICY
<p>Growth Visioning – The following “Regional Growth Principals” are proposed to provide a framework for local and regional decision making that improves the quality of life for all SCAG residents:</p> <p><i>Principal 1: Improve mobility for all residents.</i></p> <ul style="list-style-type: none"> • Encourage transportation investments and land use decisions that are mutually supportive. • Locate new housing near existing jobs and new jobs near existing housing. • Encourage transit-oriented development. • Promote a variety of transit choices. <p><i>Principal 2: Foster livability in all communities.</i></p> <ul style="list-style-type: none"> • Promote infill development and redevelopment to revitalize existing communities. • Promote developments which provide a mix of uses. • Promote “people scaled” walking communities. • Support the preservation of stable, single-family neighborhoods. <p><i>Principal 3: Enable prosperity for all people. Provide, in each community, a variety of housing types to meet the housing needs of all income levels.</i></p> <ul style="list-style-type: none"> • Support educational opportunities that promote balanced growth. • Ensure environmental justice regardless of race, ethnicity, or income class. • Support local and state fiscal policies that encourage balanced growth. • Encourage civic engagement. <p><i>Principal 4: Promote sustainability for future generations.</i></p> <ul style="list-style-type: none"> • Preserve rural, agricultural, recreational, and environmentally sensitive areas. • Focus development in urban centers and existing cities. • Development strategies to accommodate growth that uses resources efficiently, eliminate pollution, and significantly reduce waste. • Utilize “green” development techniques. 	<p>The proposed project is consistent with the project site’s “Light Industrial” land use designation as established in the City of Perris General Plan. Although, the project proposes light industrial uses, this use is similar in nature and consistent with uses found in the surrounding area.</p> <p>The proposed project is located within an area that has been planned for business park and light industrial land uses since the adoption of the General Plan. Roads, water, sewer, and storm drain infrastructure are being constructed within the area to serve the rapidly developing area per the EMWD Master Plan. These infrastructure elements will be extended into the project site as a condition of its development. The concentrated development within this region will utilize resources more efficiently thereby creating less pollution.</p> <p>The project will comply with all federal, state, and local requirements for the reduction of waste and conservation of water resources.</p> <p>For these reasons, the proposed project is considered to be consistent with these “Growth Visioning” principles.</p>

Proposed Mitigation Measures

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (CEQA Guidelines, Section 15126.4). By changing the existing zoning designation from “Light Agricultural” to a zoning designation (“Light Industrial”) that is compatible with the surrounding land uses will also creates consistencies between the General Plan and Zoning Code. Impacts were found to be **less than significant**; therefore, no mitigation measures are necessary.

The Land Use and Planning issues related to the project have been determined to be less than significant. Therefore, no Land Use and Planning mitigation is necessary. Mitigation measures related to other compatibility issues arising from the proposed land use changes and potential project impacts are identified in the following sections of this document: Agricultural Resources (Section 4.1), Airports (Section 4.2), Air Quality (Section 4.3), Biological Resources (Section 4.4), Noise (Section 4.10) and Transportation and Traffic (Section 4.13).

With implementation of the mitigation measures set forth in the Airports (Section 4.2), Air Quality (Section 4.3), Biological Resources (Section 4.4), Noise (Section 4.10) and Transportation and Traffic (Section 4.13) sections of this EIR, potential impacts due to land use and planning issues were determined to be less than significant and additional mitigation measures are not required.

The proposed project is consistent with the regional and local growth forecasts and the SCAG RCPG Policies and the SCAG RTP. Therefore, it is determined that the proposed project’s potential impacts related to consistency with regional plans are below the level of significance. Consequently mitigation measures specifically related to this issue are not required.

Summary of Environmental Effects After Mitigation Measures Are Implemented

Implementation of the proposed project will not conflict with any applicable land use or conservation plans. Impacts are considered **less than significant**.

All potential direct impacts of the project related to consistency with regional plans will be less than significant. Mitigation measures are not required to reduce potential impacts from the proposed project to a level that is less than significant.

With implementation of the mitigation measures set forth in the Agricultural Resources (Section 4.1), Airports (Section 4.2), Air Quality (Section 4.3), Biological Resources (Section 4.4), Noise (Section 4.10) and Transportation and Traffic (Section 4.13) sections of this EIR, all potential impacts of the project related to general plan and zoning consistency, and land use and planning will be reduced to a less than significant level.

4.10 NOISE

Potential impacts related to private airport noise were found to be less than significant in the Initial Study/NOP prepared for this project (Appendix A). The focus of the following discussion is related to the potential impacts both to and from the project including: exposure of people to severe noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels; substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project; substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project; and exposure of people residing or working in the project area to excessive noise levels from airport noise.

In addition to other reference documents, the following references were used in the preparation of this section of the DEIR:

- Albert A. Webb Associates, *Preliminary Acoustical Impact Analysis for Rados Distribution Center*, September 29, 2009. (Appendix I)
- City of Perris, *City of Perris General Plan 2030*, July 12, 2005. (Available at the City of Perris and at www.cityofperris.org/city-hall/general-plan.html, accessed on December 9, 2008.)
- FTA, *Transit Noise and Vibration Impact Assessment*, May 2006. (Available at www.fta.dot.gov/planning/environment/planning_environment_2233.html)
- March Air Reserve Base United States Air Force, *Air Installation Compatible Use Zone (AICUZ) Study*, 1998. (Available at <http://www.marchjpa.com/docs.html>, accessed on March 3, 2010.)
- March Air Reserve Base United States Air Force, *Air Installation Compatible Use Zone (AICUZ) Study*, 2005. (Available at <http://www.marchjpa.com/docs.html>, accessed on March 3, 2010.)

Setting

The project site is bounded by Indian Avenue to the east, Rider Street to the south, and Webster Avenue to the west, approximately 556 feet east of Interstate 215 and 0.8 miles south of Ramona Expressway, in the City of Perris, Riverside County, California. The surrounding existing land uses include: a distribution warehouse to the north; a crop field to the east; an auction facility to the south; and a crop field to the west. The surrounding General Plan land use designations include: Light Industrial and Public/Semi-Public Facilities/Utilities to the north; Light Industrial and Public/Semi-Public Facilities/Utilities to the east; Business Park to the south; and Light Industrial and Public/Semi-Public Facilities/Utilities to the west.

Existing noise levels near the proposed project site derive mainly from vehicular sources along Indian Avenue, Morgan Street, and Rider Street. The nearest noise-sensitive land uses are residences located approximately 0.26 miles (1,379 feet) south of the site, located on the west

side of Susan Lane. Interstate 215 is approximately 0.12 miles west of the project site. At this distance, the freeway noise is a steady hum with little change in pitch or intensity and is not a significant source of noise to the project.

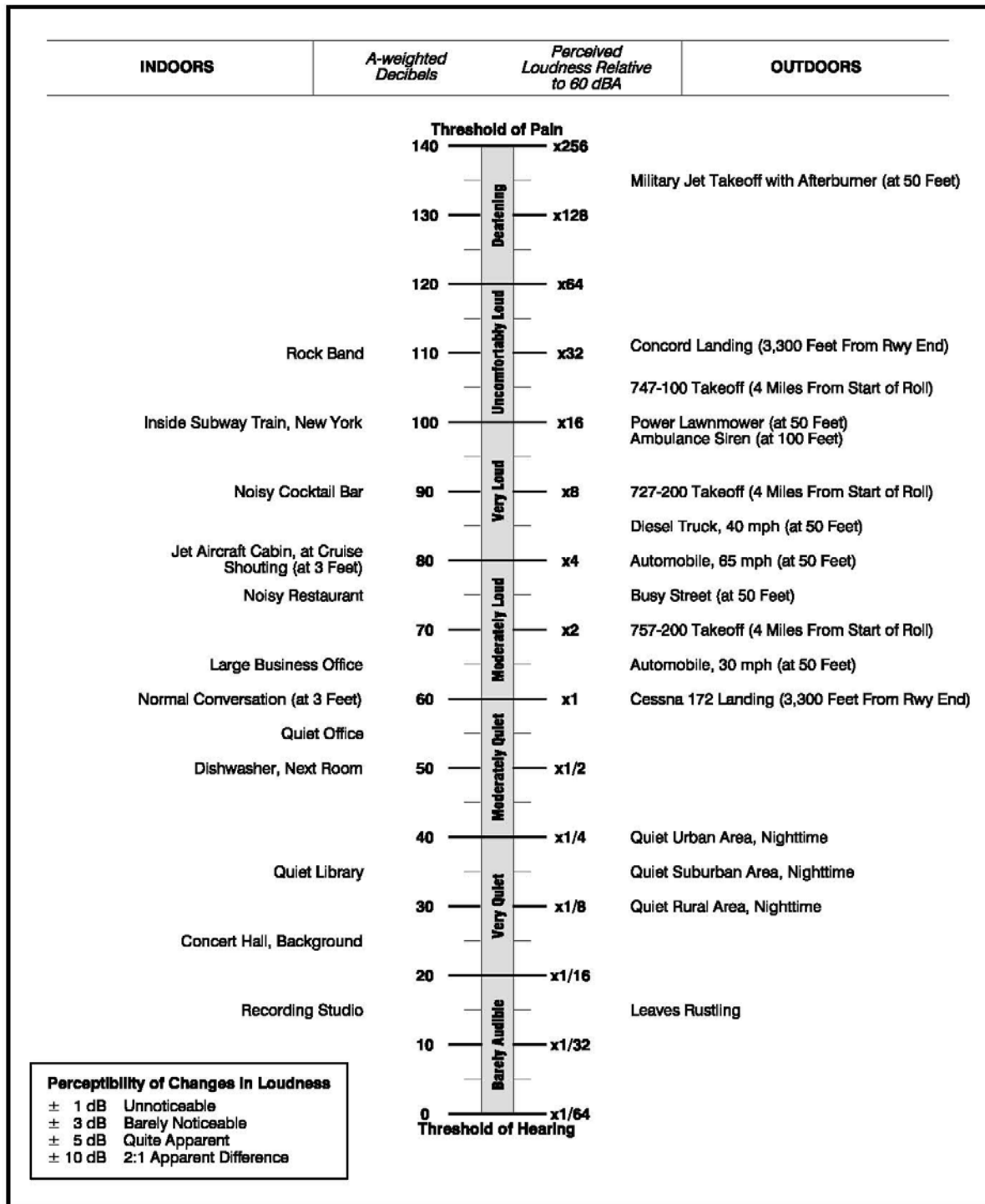
Acoustical Analysis Background

Noise is defined as unwanted or objectionable sound. The effect of noise on people can include general annoyance, interference with speech communication, sleep disturbance and, in the extreme, hearing impairment. The unit of measurement used to describe a noise level is the decibel (dB). However, since the human ear is not equally sensitive to all frequencies within the sound spectrum, the “A-weighted” noise scale, which weights the frequencies to which humans are sensitive, is used for measurements. Noise levels using A-weighted measurements are written dB(A) or dBA. Decibels are measured on a logarithmic scale which quantifies sound intensity in a manner that is similar to the Richter scale used for earthquake magnitudes. In the case of noise, a doubling of the energy from a noise source, such as the doubling of a traffic volume, would increase the noise level by 3 dBA; a halving of the energy would result in a 3 dBA decrease. **Figure 4.10-1, Typical Decibel Level of Common Sounds**, shows the relationship of various noise levels to common noise events.

Average noise levels over a period of minutes or hours are usually expressed as dB L_{eq} or the equivalent noise level for that period of time. For example, $L_{eq(3)}$ would represent a three hour average. When no time-period is specified, a one-hour average is assumed. Noise standards for land use compatibility are stated in terms of the Community Noise Equivalent Level (CNEL) and the Day-Night Average Noise Level (Ldn). CNEL is a 24-hour weighted average measure of community noise. The computation of CNEL adds 5 dBA to the average hourly noise levels between 7 p.m. and 10 p.m. (evening hours), and 10 dBA to the average hourly noise levels between 10 p.m. and 7 a.m. (nighttime hours). This weighting accounts for the increased human sensitivity to noise in the evening and nighttime hours. Ldn is a very similar 24-hour weighted average which weights only the nighttime hours and not the evening hours. CNEL is normally about 1 dB higher than Ldn for typical traffic and other community noise levels.

Sensitive receptors are areas where humans are participating in activities that may be subject to the stress of significant interference from noise. Land uses associated with sensitive receptors often include residential dwellings, mobile homes, hotels, motels, hospitals, nursing homes, education facilities, and libraries. Other receptors include office and industrial buildings, which are not considered as sensitive as single-family homes, but are still protected by City of Perris land use compatibility standards.

**Figure 4.10-1
Typical Decibel Level of Common Sounds**



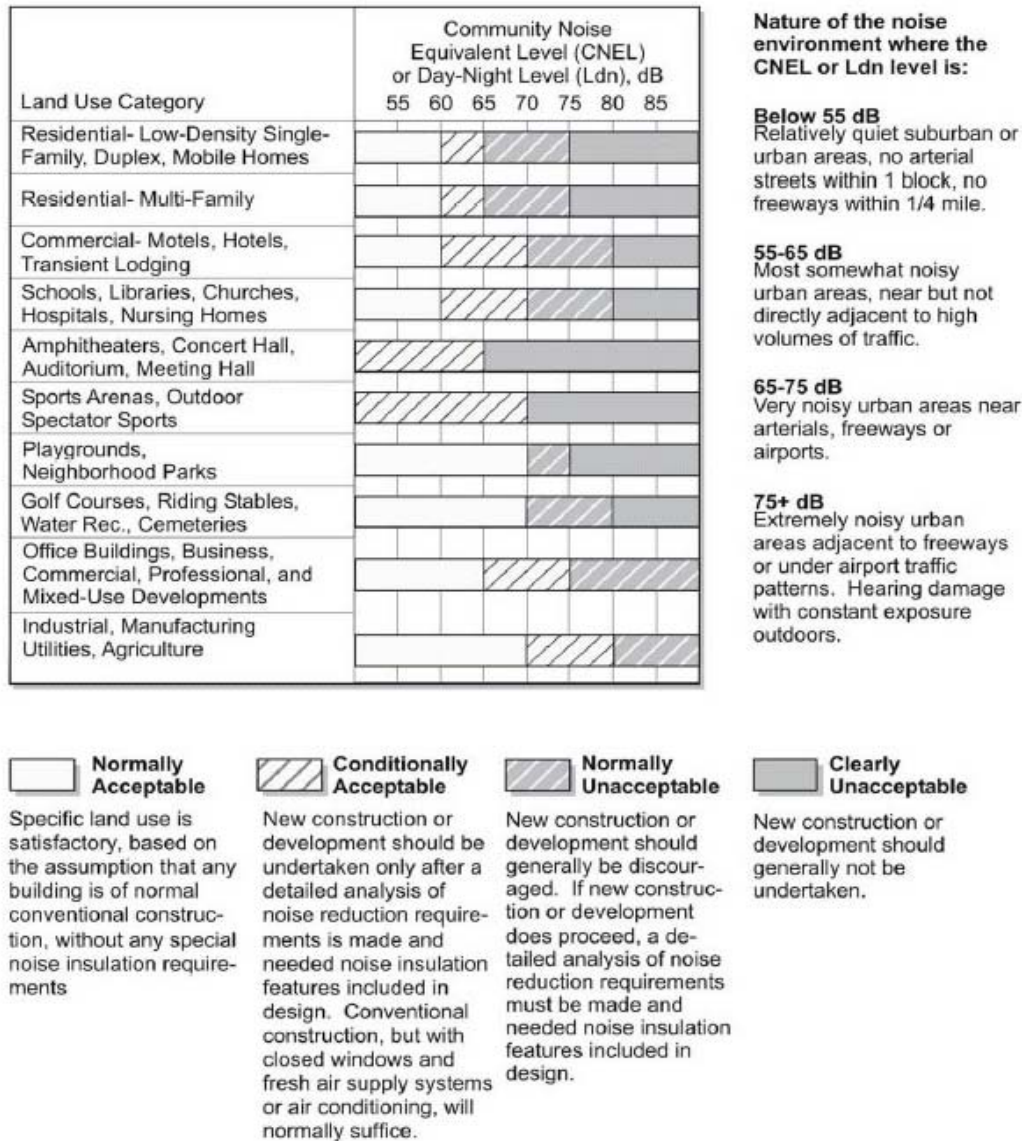
Source: California Airport Land Use Planning Handbook (January 2002), Page 6-5

Noise exposure standards have been developed by the State of California and recommended for inclusion into the Noise Element of local general plans. The City of Perris has adopted a modified version of the state guidelines in its Noise Element. **Figure 4.10-2, Land Use Compatibility for Community Noise Exposure**, shows the matrix of exterior noise exposures considered acceptable for various land uses. According to the data provided in **Figure 4.10-2**, exterior noise impacts upon industrial land uses are normally acceptable up to 70 dBA CNEL; and conditionally acceptable up to 80 dBA CNEL. In this regard, the phrase “normally acceptable” is defined by the City as “specified land use is satisfactory based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.” Likewise, the phrase “conditionally acceptable” is defined as “new construction or development should be undertaken only after detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.”

Existing Noise Levels

Existing noise levels throughout the vicinity of the proposed project derive mainly from vehicular sources on the surrounding roads. Elevated noise levels are typically confined to a narrow corridor along these roads. Project-related trips will be concentrated near the project site and then become progressively diluted as traffic spreads out throughout the region. In order to determine project-specific noise increases along the 17 roadway segments identified in the noise study, CNEL levels were calculated at a uniform but arbitrary distance of 50 feet from roadway centerline. The vehicle mix and speeds used to calculate the vehicular noise impacts were derived from Appendix D of the Noise Element from the City of Perris General Plan. The reference noise levels take into account the type of the roadway (i.e., Type 1, Type 2) which is indicative of the vehicle mix (see **Table 4.10-C** for details). The existing noise levels on roadways within the project vicinity are presented in **Table 4.10-A, Noise Levels at 50 Feet from Centerline Under Existing Conditions**.

Figure 4.10-2
Land Use Compatibility for Community Noise Exposure



The Community Noise Equivalent Level (CNEL) and Day-Night Noise Level (Ldn) are measures of the 24-hour noise environment. They represent the constant A-weighted noise level that would be measured if all the sound energy received over the day were averaged. In order to account for the greater sensitivity of people to noise at night, the CNEL weighting includes a 5-decibel penalty on noise between 7:00 p.m. and 10:00 p.m. and a 10-decibel penalty on noise between 10:00 p.m. and 7:00 a.m. of the next day. The Ldn includes only the 10-decibel weighting for late-night noise events. For practical purposes, the two measures are equivalent for typical urban noise environments.

Source: Exhibit N-1, City of Perris General Plan 2004, Noise Land Use/Noise Compatibility Guidelines.

Table 4.10-A
Noise Levels at 50 Feet from Centerline Under Existing Conditions

Road Segment	Existing	
	ADT ¹	dBA CNEL ²
Webster Avenue		
n/o Rider Street	--	--
n/o Morgan Street	2700	63.8
Indian Avenue		
n/o Placentia Avenue	2500	63.5
n/o Rider Street	3600	65.1
n/o Morgan Street	2700	63.8
n/o Ramona Expressway	100	49.5
n/o Markham Street	200	52.5
n/o Oleander Avenue	3400	64.8
Oleander Avenue		
e/o I-215	7500	68.3
w/o Indian Avenue	6200	67.4
Ramona Expressway		
w/o I-215	16400	71.7
e/o I-215	26200	73.7
w/o Webster Avenue	25200	73.5
w/o Indian Avenue	21000	72.7
e/o Indian Avenue	21500	72.8
Rider Street		
w/o Indian Avenue	2700	63.8
w/o Perris Boulevard	4200	65.7

¹ ADT = Average Daily Traffic

² CNEL = Community Noise Equivalent Level

Related Regulations

State of California Noise Insulation Standards

The California Commission of Housing and Community Development officially adopted noise standards in 1974. In 1988, the Building Standards Commission revised the noise standards (California Noise Insulation Standards).

State of California Vehicular Code

Recent studies have shown that the most objectionable feature of traffic noise is the sound produced by vehicles equipped with illegal or faulty exhaust systems. In addition, such vehicles are often operated in a manner that causes tire squeal and excessively loud exhaust noise. A number of California State vehicle noise regulations can be enforced by local authorities as well as the California Highway Patrol. These include § 23130, § 23130.5, § 27150, and § 38275 of the California Vehicle Code, as well as excessive speed laws, which may be applied to curtail traffic noise:

§ 23130 and § 23130.5 establish maximum noise emission limits for the operation of all motor vehicles at any time under any conditions of grade, load, acceleration, or deceleration.

§ 27150 require motor vehicles to be equipped with an adequate muffler to prevent excessive noise.

§ 38275 require off-highway motor vehicles to be equipped with an adequate muffler to prevent excessive noise.

The California Highway Patrol and the Department of Health Services (through local health departments) are available to aid local authorities in code enforcement and training pursuant to proper vehicle sound level measurements.

Municipal Code

Section 7.34.060 of the Municipal Code limits the hours of construction to between the hours of 7:00 a.m. and 7:00 p.m., Monday through Saturday. No construction activities are permitted outside of these hours and on Sundays and legal holidays, except for Columbus Day and Washington's Birthday. Construction activity shall also not exceed 80 dBA in residential zones in the City.

City of Perris Noise Element

The California Government Code requires that a noise element be included in the General Plan of each county and city in the state. The Noise Element of the City of Perris General Plan is intended to identify sources of noise and provide objectives and policies that ensure that noise from various sources does not create an unacceptable noise environment. It is a tool that City planners use to achieve and maintain compatible land uses with environmental noise levels. The Noise Element of the City's General Plan establishes exterior and interior noise standards for the evaluation of compatibility between land uses in the City. The guidelines adopted by the City of

Perris are included in the City's 2004 General Plan and is shown in **Figure 4.10-2, Land Use Compatibility for Community Noise Exposure**. The City specifies outdoor and indoor noise limits for new residential uses, places of worship, educational facilities, hospitals, hotels/motels, commercial, industrial, and other land uses. Exterior noise levels at new industrial projects may reach up to 80 dBA CNEL provided that conventional construction techniques are used and that fresh air supply systems and/or air conditioning are provided so that windows may be kept closed; thus providing acceptable exterior to interior noise reduction.

City of Perris General Plan Policies

As discussed above, one of the goals of the Noise Element of the General Plan is that future land uses are compatible with projected noise environments. For the proposed light industrial project, "Conditionally Acceptable" noise levels extend up to 80 dBA.

Another goal in the Noise Element of the General Plan is to mitigate stationary noise impacts, from non-residential land uses upon noise-sensitive land uses, to a normally acceptable level. The corresponding policy provides that commercial/industrial projects should mitigate noise impacts to an acceptable level as required by the State of California Noise/Land Use Compatibility Criteria. For residential uses, 60 dBA to 65 dBA is considered conditionally acceptable.

Additionally, the General Plan lists a change in 5 dBA as being readily discernable to most people in an exterior environment. Given that this would be an increase that would be considered reasonable for someone to perceive, an increase in 5 dBA will be used as a threshold of significance for impacts to sensitive land uses. Additionally, where 60 dBA is exceeded and the project causes an increase of 3 dBA or more at a sensitive land use, impacts are considered significant.

The specific General Plan goals, policies, and measures are as follows:

Noise Element

The City of Perris General Plan Noise Element contains goals, policies, and implementation measures applicable to the proposed project, as follows:

Goal I – Land Use Siting: Future land use compatible with project noise environments

Policy I.A: The State of California Noise/Land Use Compatibility Criteria shall be used in determining land use compatibility for new development.

Implementation Measure I.A.1: All new development proposals will be evaluated with respect to the State Noise/Land Use Compatibility Criteria. Placement of noise sensitive uses will be discouraged within any area exposed to exterior noise levels that fall into the "Normally Unacceptable" range and prohibited within areas exposed to "Clearly Unacceptable" noise ranges.

Goal V – Stationary Noise Sources: Future non-residential land uses compatible with noise sensitive land uses

Policy V.A: New large scale commercial or industrial facilities located within 160 feet of sensitive land uses shall mitigate noise impacts to attain an acceptable level as required by the State of California Noise/Land Use Compatibility Criteria.

Implementation Measure V.A.1: An acoustical impact analysis shall be prepared for new industrial and large scale commercial/industrial facilities to be constructed within 160 feet of the property line of any existing noise sensitive land use. This analysis shall document the nature of the commercial or industrial facility, as well as, all interior or exterior facility operations that would generate exterior noise. The analysis shall document the placement of any existing or proposed noise-sensitive land uses situated within the 160-foot distance. The analysis shall determine the potential noise levels that could be received at these sensitive land uses and specify specific measures to be employed by the large scale commercial or industrial facility to ensure that these levels do not exceed 60 dBA CNEL at the property line of the adjoining sensitive land use. No development permits or approval of land use applications shall be issued until the acoustic analysis is received.

The State of California Noise/Land Use Compatibility Criteria adopted by the City is shown in **Figure 4.10-2**. As shown on **Figure 4.10-2**, exterior noise levels at new industrial projects may reach up to 80 dBA CNEL provided that conventional construction techniques are used and that fresh air supply systems and/or air conditioning are provided so that windows may be kept closed; thus, providing acceptable exterior to interior noise reduction. This would be required for the quiet areas of the proposed buildings, such as offices; but not the active warehouse uses.

The noise impacts from construction are addressed in Appendix C of the Noise Element of the City of Perris General Plan 2030 (General Plan). The Noise Element defines construction noise as the following:

Noise levels will vary with the type of equipment and size of the active construction zone. Assuming that construction was to occur for 8-hours a day, the CNEL is calculated at 84 dBA at 50 feet (83 dBA CNEL for residential construction). The 65-dBA CNEL contour would fall at a distance of about 446 feet (397 feet for residential construction). The City recognizes that construction noise is difficult to control and has established allowable hours for this intrusion. Section 18-63 of the Municipal Code, “Enumeration of Prohibited Noises” provides an exemption for noise from construction and repair work as long as these activities are limited to between the hours of 7:00 a.m. and 6:00 p.m. on weekdays. Because construction activities are typically limited to weekdays during daylight hours, this noise impact is considered a nuisance or annoying, rather than a significant impact. Continued compliance with these restrictions will reduce construction noise impacts to a level considered less than significant.

Design Considerations

There are no aspects of the proposed project's design that would reduce noise impacts.

Thresholds of Significance

The City of Perris has not adopted its own of significance and, instead, defers to the thresholds of significance identified in Appendix G of the CEQA Guidelines. Based on Appendix G of the CEQA Guidelines, impacts related to and from noise may be considered potentially significant if the proposed project would:

- result in exposure of people to severe noise levels in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies;
- result in exposure of persons to or generation of excessive ground-born vibration or ground-born noise levels;
- result in substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project;
- result in exposure of people residing or working in the project area to excessive noise levels from airport noise; and/or
- result in substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.

There is no official “industry standard” of determining significance for noise impacts. However, typically, a jurisdiction will identify either a 3 dBA or 5 dBA increase as being the threshold because these levels represent varying levels of perceived noise increases. The City of Perris Noise Element in the General Plan states that a change in 5 dBA is “readily discernable to most people in an exterior environment.” Accordingly, an increase in 5 dBA is considered significant for all sensitive receptors along road segments that do not exceed 60 dBA. Additionally, per the City of Perris, for sensitive receptors, if the noise increase would meet or exceed the City's 60 dBA CNEL standard, then an increase of 3 dBA would also be considered significant.

Environmental Impacts Before Mitigation

Threshold: *Result in exposure of people to severe noise levels in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies.*

The proposed project involves the development of an approximately 1,191,080 square-foot distribution center on a 61.63-acre parcel. The distribution center will have 1,169,480 square feet of warehouse space and 21,600 square feet of office space. The project includes overflow trailer parking located on Metropolitan Water District's (MWD) property located immediately north of the project site. The project site is bounded by Indian Avenue to the east, Rider Street to the

south, and Webster Avenue to the west, approximately 556 feet east of Interstate 215 and 0.8 miles south of Ramona Expressway, in the City of Perris, Riverside County, California.

The surrounding existing land uses include: a distribution warehouse to the north; a crop field to the east; an auction facility to the south; and a crop field to the west. The surrounding General Plan land use designations include: Light Industrial and Public/Semi-Public Facilities/Utilities to the north; Light Industrial and Public/Semi-Public Facilities/Utilities to the east; Business Park to the south; and Light Industrial and Public/Semi-Public Facilities/Utilities to the west.

A total of 353 parking stalls have been designed to accommodate trailer parking on the project site. The project has loading docks located along the north side of the building with 131 truck bays; and, 123 truck bays are located along the south side of the building for a total of 254 truck bays. The hours of operation have not been established, as a future tenant of the proposed building has not yet been determined.

The guidelines adopted by the City of Perris are included in the City's 2004 General Plan and are shown in **Figure 4.10-2, Land Use Compatibility for Community Noise Exposure**. For the proposed light industrial project, "Normally Acceptable" noise levels extend up to 70 dBA CNEL and "Conditionally Acceptable" noise levels extend up to 80 dBA. The Noise Study shows that the proposed project is located in an environment exposed to noise levels approaching 74 dBA. For industrial uses, noise levels up to 80 dBA CNEL are considered "conditionally acceptable" which means the development of the proposed project will meet the applicable standards with conventional construction methods, including fresh air supply systems or air conditioning units. No further on-site noise mitigation is required.

For compatibility between future non-residential and noise sensitive land uses, General Plan Policy V.A requires new large scale commercial and industrial facilities located within 160 feet of sensitive land uses to mitigate noise impacts to an acceptable level as required by the State of California Noise/Land Use Compatibility Criteria.

Although this project involves the construction of a new large scale industrial facility, it is not located within 160 feet of sensitive land uses. The nearest sensitive receptor is located approximately 1,379 feet south of the project site. General Plan Policy V.A is very specific in that it applies only to sensitive receivers located within a 160-foot radius of new industrial and large-scale commercial facilities. The discussion of General Plan Policy V.A is included only for the purpose of drawing attention to the fact that no sensitive receivers exist within the policy's restricted radius, thereby meeting the policy's primary goal.

Since the project is speculative with no established tenants, the noise study was unable to analyze future on-site-generated impacts at a specific level. However, as the noise study indicated, certain noise-generating activities are typically associated with distribution facilities, such as trucks staging at loading docks, as well as loading dock activities. In lieu of specific data, the noise study provided general impact distances associated with these activities, with and without barriers, under nighttime conditions which are the conditions under which people are generally most sensitive. Based upon the reference data provided (representing noise sourced from trucks and loading dock activities, the maximum extent of unmitigated nighttime impacts extends up to

600 feet from the source) and the known distance to the nearest existing sensitive receiver (approximately 1,379 feet from the source), it was determined that the potential for adverse noise impacts upon that receiver are negligible and did not warrant further analysis. Therefore, this project complies with the goal of General Plan Policy V.A.

Operational activity noise from industrial center/warehousing operations would possibly derive from on-site loading or un-loading operations, or from on- and off-site movements. Materials-handling at cross-dock facilities occurs within the warehouse where truck trailers block any noise propagation through any open truck bay doors. An occasional ‘thump’ is audible when a forklift drives into a trailer to pick up or set down a pallet of materials, but such single-event noise is infrequent. If truck unloading occurs at night and in close proximity to residential uses, the low frequency thumps can be intrusive and sleep-disturbing if adjacent residences have open bedroom windows.

Nuisance potential is exacerbated if trailers are delivered or picked up at night. The impact of the fifth wheel on the trailer pin, cranking of the “landing gear”, hiss of air brake release, closure of trailer doors, and low-gear truck acceleration may increase the dock activity noise. Again, no specific impact distance can be reliably determined, but a doubled zone of partial impact is reasonably compared to loading dock operations without truck movement. **Table 4.10-B, Zone of Potential Noise Impact**, provides distances from the loading activity noise source to which impacts could extend, relative to the nearest residences.

**Table 4.10-B
Zone of Potential Noise Impact**

Activity	No Mitigation (feet)	With Mitigation (feet)
Loading dock only	300	100
Loading dock and truck/trailer movements	600	200

Ways to reduce this operational noise would typically entail a solid barrier that completely blocks the line-of-sight between the source and the receiver. Daytime operational noise is not considered a source of significant impact if a barrier shields the visibility of the loading activity from any ground-floor observers. Activities that occur at the rear of buildings, with no direct line-of-sight to residences; and not directly adjacent to the sensitive land uses; will be shielded by the building itself.

For this project, the closest sensitive receptor is 1,379 feet from the project site, well beyond the 600-foot zone of potential noise impact without mitigation; therefore, the noise impact from on-site operations is considered **less than significant. No further mitigation is required.**

Threshold: *Result in the exposure of persons to or generation of excessive ground-born vibration or ground-born noise levels.*

Vibration refers to groundborne noise and perceptible motion. Typical sources of groundborne vibration are construction activities (e.g., blasting, pile driving, and operating heavy-duty earthmoving equipment), steel-wheeled trains, and occasional traffic on rough roads. Groundborne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors, where the motion may be discernable but without the accompanying effects (e.g., shaking of a building).

Groundborne vibration is measured in terms of the velocity of the vibration oscillations. When the velocity of the vibration oscillations exceeds 0.1 inch per second (in/sec), it is generally perceived as annoying to occupants of buildings. The degree of annoyance is dependent upon type of land use, individual sensitivity to vibration, and the frequency of the vibration events. Typically, vibration levels must exceed 0.2 in/sec before building damage occurs.

Problems with groundborne vibration and noise are usually localized to areas within about 100 feet from the vibration source, although there are examples of groundborne vibration causing interference out to distances greater than 200 feet.

The proposed project is not located near steel-wheeled trains as the closest railroad is approximately 0.15 miles west of the project site, on the opposite side of the I-215 freeway. Additionally, roadways in the project area are either paved or would be paved and would not result in traffic driving over rough roads. Due to the distance from the project site, groundborne vibration from grading construction equipment, such as earthmovers and haul trucks at 10 feet, would not create vibration amplitudes that would cause damage to nearby structures.

The construction of the proposed project would not generate groundborne vibration that would impact the closest sensitive receptors (the residences to the south) as these receptors are approximately 1,379 feet away the project's southernmost boundary. Therefore, impacts from construction-related groundborne vibration would be **less than significant** and no mitigation would be required.

Threshold: *Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.*

Construction noise will result in a temporary change in ambient noise levels. Noise generated by construction equipment, including trucks, graders, bulldozers, concrete mixers, and portable generators, can reach significant levels ranging from 70 dBA to 105 dBA at 50 feet from noise source (**Figure 4.10-3, Typical Construction Equipment Noise Levels**).

As a rule of thumb, noise from point sources, such as construction equipment, will decrease by 6 dBA for every doubling of distance away from the receptor. For example, when the construction equipment is 100 feet from the sensitive receptor, the decibel level would be 6 dBA lower than when it is 50 feet from the sensitive receptor and 12 dBA lower than the level it is at 50 feet when it is 200 feet from the sensitive receptor. Therefore, actual construction noise levels at each

sensitive receptor may be somewhat less depending upon its distance from construction activity. The level of impact will depend upon several factors: 1) the distance between construction activity and the sensitive receptors, 2) the types of equipment used, and 3) the hours of construction operations, among others.

Section 7.34.060 of the Municipal Code limits the hours of construction to between the hours of 7:00 a.m. and 7:00 p.m., Monday through Saturday. No construction activities are permitted outside of these hours and on Sundays and legal holidays, except for Columbus Day and Washington's Birthday. Because construction activities are typically limited to weekdays, during daylight hours, this noise impact is considered a nuisance or annoying, rather than a significant impact. Continued compliance with these restrictions will reduce construction noise impacts to a level considered less than significant.

The closest sensitive land use is located approximately 1,379 feet south of the site, located on the west side of Susan Lane. Since the sensitive land use is located further away from the site than 446 feet, the potential for construction noise to affect any sensitive receptors is considered **less than significant**.

**Figure 4.10-3
Typical Construction Equipment Noise Levels**

EQUIPMENT			NOISE LEVEL (dBA) AT 50 FEET						
			60	70	80	90	100	110	
EQUIPMENT POWERED BY INTERNAL COMBUSTION ENGINES	EARTH MOVING	Compactors (Rollers)							
		Front Loaders							
		Backhoes							
		Tractors							
		Scrapers, Graders							
		Pavers							
		Trucks							
	MATERIAL HANDLING	Concrete Mixers							
		Concrete Pumps							
		Cranes (Moveable)							
		Cranes (Derrick)							
	STATIONARY	Pumps							
		Generators							
		Compressors							
IMPACT EQUIPMENT		Pneumatic Wrenches							
		Jack Hammers and Rock Drills							
		Pile Drivers							
OTHER		Vibrators							
		Saws							

Threshold: *Result in substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.*

For the purposes of this section, a substantial permanent increase at a sensitive receptor location is defined as follows:

- an increase of 3 dBA or more from existing noise levels where the 60 dBA noise standard for sensitive receptors is exceeded; and/or
- an increase of 5 dBA or more from existing noise levels at all other sensitive receptor locations.

Operational activity noise from industrial center/warehousing operations would possibly derive from on-site loading or un-loading operations, or from on- and off-site movements. Materials-handling at cross-dock facilities occurs within the warehouse where truck trailers block any noise propagation through any open truck bay doors. An occasional ‘thump’ is audible when a forklift drives into a trailer to pick up or set down a pallet of materials, but such single-event noise is infrequent. If truck unloading occurs at night and in close proximity to residential uses, the low frequency thumps can be intrusive and sleep-disturbing if adjacent residences have open bedroom windows.

According to the Noise Study, the closest sensitive receptor is 1,379 feet from the project site, well beyond the 600-foot zone of potential noise impact (referred to on pages 4.10-11 and 12) without mitigation; therefore, the **noise impact from on-site operations is considered less than significant. No further mitigation is required.**

The proposed project will contribute noise to the existing environment through the addition of traffic on local streets. The additional traffic noise generation was evaluated in the project’s noise study (Appendix I) which relied on traffic data from the project-specific traffic study (Appendix J).

Off-site noise levels were calculated along road segments in the project vicinity for existing conditions (2008), existing plus project (2011), and cumulative plus project (2011), which includes traffic generated by the project and other known projects in the vicinity.

Future noise impacts resulting from vehicular traffic on roadways were modeled using the California specific vehicle noise curves (CALVENO) in the LeqV2 computer program. LeqV2 is a mainframe computer implementation of the FHWA Highway Traffic Noise Prediction Model (FHWA-RD-77-108) and was developed by the California Department of Transportation (Caltrans) in the early 1980s. The program evaluates noise at one receptor from up to eight (8) straight roadway lanes and is very useful in predicting noise impacts in simple scenarios. Site-specific information is entered, such as: traffic volumes, distances, and speeds; and adjustments can be made for the use of noise barriers. The vehicle mix and speeds used to calculate the vehicular noise impacts were derived from Appendix D of the Noise Element from the City of Perris General Plan. The reference noise levels take into account the type of the roadway (i.e.,

Type 1, Type 2) which is indicative of the vehicle mix. **Table 4.10-C, City of Perris Standard Vehicle Mix (Percent)**, shows the percent of each type of vehicle per type of route.

Table 4.10-C
City of Perris Standard Vehicle Mix (Percent)

Route Type	Auto	Medium Truck	Heavy Truck
Type 1	95.22	3.24	1.54
Type 2	90.94	4.06	5.00

Analysis of area-wide noise impacts from project-related traffic was done by calculating the noise levels at an arbitrary distance of 50 feet from the centerline of each road. The formulae used are shown in Appendix A of the noise study. In addition, the site is treated as a “hard” site, which allows for a 3 dBA reduction for each doubling of the distance from the noise source to receiver.

None of the 17 roadway segments that were analyzed in the Traffic Study are adjacent to existing sensitive receptors. Therefore, an increase of 5 dBA or greater above that of existing levels is considered substantial. **Table 4.10-D, Area-Wide Noise Levels at 50 Feet from Centerline** shows that the proposed project itself will not result in a substantial increase in noise levels along any of the modeled road segments.

Table 4.10-D
Area-Wide Noise Levels at 50 Feet from Centerline

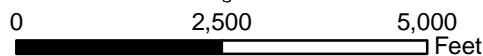
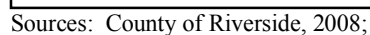
Road Segment	Existing		Existing Plus Ambient Growth Plus Cumulative Plus Project						Total Increase Compared to Existing Conditions
	ADT	dBA CNEL	Existing + Ambient Growth + Cumulative		Project Only		Existing + Ambient Growth + Cumulative + Project Combined Total	Project- Specific Increase	
			ADT	dBA CNEL	ADT	dBA CNEL			
Webster Avenue									
n/o Rider Street	--	--	400	55.5	400	55.5	58.5	3.0	58.5
n/o Morgan Street	2700	63.8	4000	65.5	100	49.5	65.6	0.1	1.8
Indian Avenue									
n/o Placentia Avenue	2500	63.5	8900	69.0	100	49.5	69.0	0.0	5.5
n/o Rider Street	3600	65.1	11000	69.9	1900	62.3	70.6	0.7	5.5
n/o Morgan Street	2700	63.8	13900	70.9	1900	62.3	71.5	0.6	7.7
n/o Ramona Expressway	100	49.5	6600	67.7	1700	61.8	68.7	1.0	19.2
n/o Markham Street	200	52.5	11700	70.2	1700	61.8	70.8	0.6	18.3
n/o Oleander Avenue	3400	64.8	7700	68.4	200	52.5	68.5	0.1	3.7

Oleander Avenue									
e/o I-215	7500	68.3	44100	76.0	1500	61.3	76.1	0.1	7.8
w/o Indian Avenue	6200	67.4	34800	74.9	1500	61.3	75.1	0.2	7.7
Ramona Expressway									
w/o I-215	16400	71.7	39000	75.4	100	49.5	75.4	0.0	3.7
e/o I-215	26200	73.7	55500	77.0	200	52.5	77.0	0.0	3.3
w/o Webster Avenue	25200	73.5	50900	76.6	200	52.5	76.6	0.0	3.1
w/o Indian Avenue	21000	72.7	45400	76.1	100	49.5	76.1	0.0	3.4
e/o Indian Avenue	21500	72.8	42000	75.7	100	49.5	75.7	0.0	2.9
Rider Street									
w/o Indian Avenue	2700	63.8	3600	65.1	1400	61.0	66.5	2.7	2.7
w/o Perris Boulevard	4200	65.7	7000	68.0	200	52.5	68.1	0.1	2.4

Table 4.10-D shows that when the Project traffic is added to Existing plus Ambient Growth plus Cumulative conditions, the highest project-specific increase is 3 dBA (on Webster Avenue north of Rider Street) where there are no sensitive receptors. Additionally, this segment of Webster Avenue is located approximately 500 feet west from I-215 where there are no noise control barriers. The resulting CNEL from the addition of 400 ADT on Webster Avenue, in this proximity to unmitigated freeway noise, would be sufficiently masked. Furthermore, without nearby sensitive receptors, the 5 dBA threshold of significance would apply. Because the 3 dBA increase is less than the 5 dBA threshold, the project will not result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project, and potential impacts are considered **less than significant**.

***Threshold:** Result in exposure of people residing or working in the project area to excessive noise levels from airport noise.*

Being located approximately 1.9 miles south-southeast of March Air Reserve Base (MARB), the project site could be impacted by airport-related noise from the airport's flight path. However, as shown on **Figure 4.10-4, MARB Noise Contours**, the project's site is located outside of the minimum reported noise contour (60 dBA CNEL) for MARB. Therefore, the project will not result in the exposure of people residing or working in the project area to excessive levels noise levels from airport operations, and **the impact to the project from airport noise is considered less than significant**.



**Figure 4.10-4
MARB Noise Contours**

Proposed Mitigation Measures

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (CEQA Guidelines, Section 15126.4). Mitigation measures were evaluated for their ability to eliminate or reduce the potential significant adverse impacts related to noise to below the level of significance. As there were no project-related significant impacts to sensitive receptors, no mitigation measures are necessary.

Summary of Environmental Effects After Mitigation Measures are Implemented

Potential impacts related to private airport noise were found to be less than significant in the Initial Study/NOP prepared for this project (Appendix A). Additionally, with regulation compliance potential impacts related to the exposure of people to severe noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels; substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project; substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project; and exposure of people residing or working in the project area to excessive noise levels from airport noise were found to be less than significant without mitigation.

4.10 NOISE

Potential impacts related to private airport noise were found to be less than significant in the Initial Study/NOP prepared for this project (Appendix A). The focus of the following discussion is related to the potential impacts both to and from the project including: exposure of people to severe noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels; substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project; substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project; and exposure of people residing or working in the project area to excessive noise levels from airport noise.

In addition to other reference documents, the following references were used in the preparation of this section of the DEIR:

- Albert A. Webb Associates, *Preliminary Acoustical Impact Analysis for Rados Distribution Center*, September 29, 2009. (Appendix I)
- City of Perris, *City of Perris General Plan 2030*, July 12, 2005. (Available at the City of Perris and at www.cityofperris.org/city-hall/general-plan.html, accessed on December 9, 2008.)
- FTA, *Transit Noise and Vibration Impact Assessment*, May 2006. (Available at www.fta.dot.gov/planning/environment/planning_environment_2233.html)
- March Air Reserve Base United States Air Force, *Air Installation Compatible Use Zone (AICUZ) Study*, 1998. (Available at <http://www.marchjpa.com/docs.html>, accessed on March 3, 2010.)
- March Air Reserve Base United States Air Force, *Air Installation Compatible Use Zone (AICUZ) Study*, 2005. (Available at <http://www.marchjpa.com/docs.html>, accessed on March 3, 2010.)

Setting

The project site is bounded by Indian Avenue to the east, Rider Street to the south, and Webster Avenue to the west, approximately 556 feet east of Interstate 215 and 0.8 miles south of Ramona Expressway, in the City of Perris, Riverside County, California. The surrounding existing land uses include: a distribution warehouse to the north; a crop field to the east; an auction facility to the south; and a crop field to the west. The surrounding General Plan land use designations include: Light Industrial and Public/Semi-Public Facilities/Utilities to the north; Light Industrial and Public/Semi-Public Facilities/Utilities to the east; Business Park to the south; and Light Industrial and Public/Semi-Public Facilities/Utilities to the west.

Existing noise levels near the proposed project site derive mainly from vehicular sources along Indian Avenue, Morgan Street, and Rider Street. The nearest noise-sensitive land uses are residences located approximately 0.26 miles (1,379 feet) south of the site, located on the west

side of Susan Lane. Interstate 215 is approximately 0.12 miles west of the project site. At this distance, the freeway noise is a steady hum with little change in pitch or intensity and is not a significant source of noise to the project.

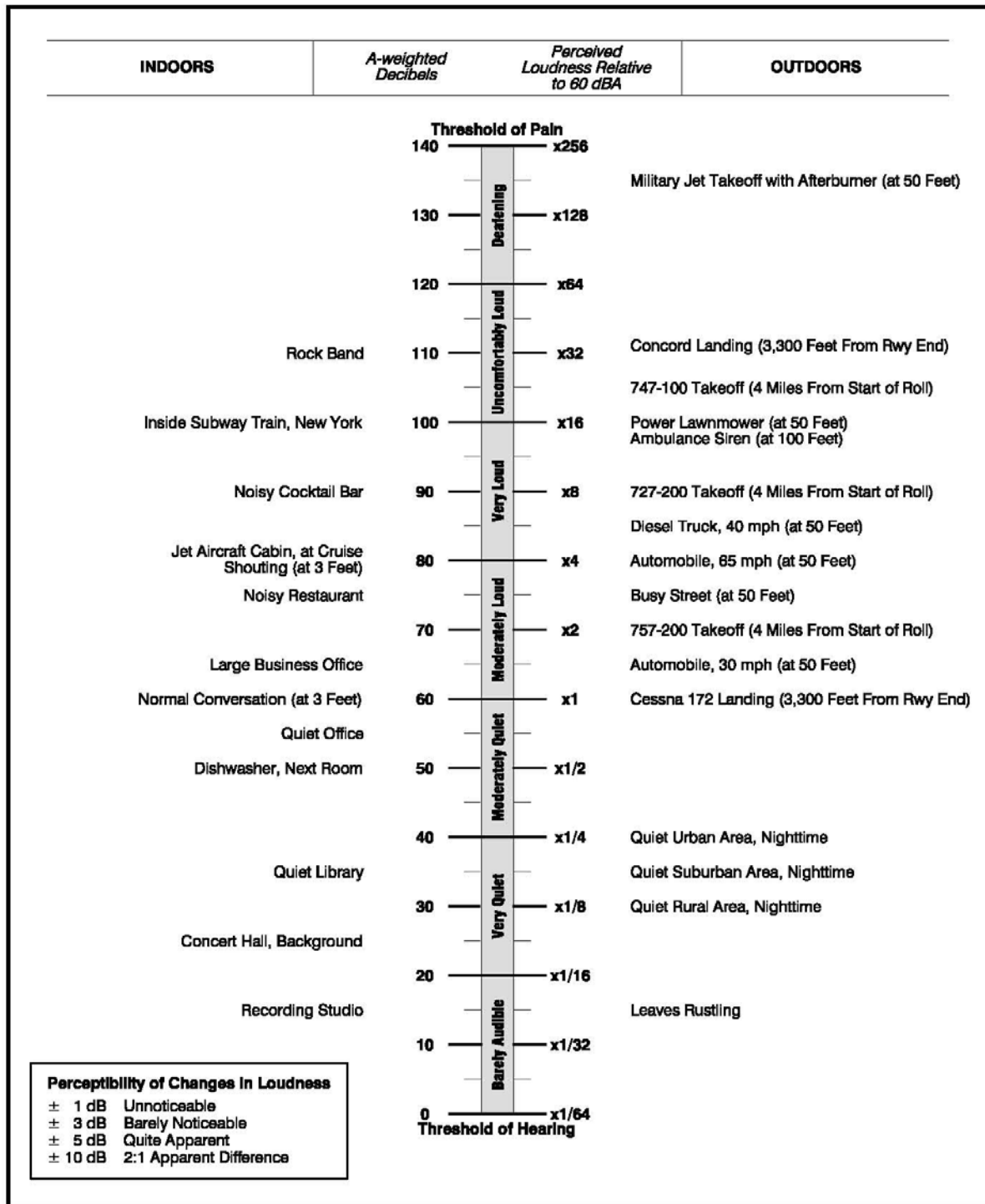
Acoustical Analysis Background

Noise is defined as unwanted or objectionable sound. The effect of noise on people can include general annoyance, interference with speech communication, sleep disturbance and, in the extreme, hearing impairment. The unit of measurement used to describe a noise level is the decibel (dB). However, since the human ear is not equally sensitive to all frequencies within the sound spectrum, the “A-weighted” noise scale, which weights the frequencies to which humans are sensitive, is used for measurements. Noise levels using A-weighted measurements are written dB(A) or dBA. Decibels are measured on a logarithmic scale which quantifies sound intensity in a manner that is similar to the Richter scale used for earthquake magnitudes. In the case of noise, a doubling of the energy from a noise source, such as the doubling of a traffic volume, would increase the noise level by 3 dBA; a halving of the energy would result in a 3 dBA decrease. **Figure 4.10-1, Typical Decibel Level of Common Sounds**, shows the relationship of various noise levels to common noise events.

Average noise levels over a period of minutes or hours are usually expressed as dB L_{eq} or the equivalent noise level for that period of time. For example, $L_{eq(3)}$ would represent a three hour average. When no time-period is specified, a one-hour average is assumed. Noise standards for land use compatibility are stated in terms of the Community Noise Equivalent Level (CNEL) and the Day-Night Average Noise Level (Ldn). CNEL is a 24-hour weighted average measure of community noise. The computation of CNEL adds 5 dBA to the average hourly noise levels between 7 p.m. and 10 p.m. (evening hours), and 10 dBA to the average hourly noise levels between 10 p.m. and 7 a.m. (nighttime hours). This weighting accounts for the increased human sensitivity to noise in the evening and nighttime hours. Ldn is a very similar 24-hour weighted average which weights only the nighttime hours and not the evening hours. CNEL is normally about 1 dB higher than Ldn for typical traffic and other community noise levels.

Sensitive receptors are areas where humans are participating in activities that may be subject to the stress of significant interference from noise. Land uses associated with sensitive receptors often include residential dwellings, mobile homes, hotels, motels, hospitals, nursing homes, education facilities, and libraries. Other receptors include office and industrial buildings, which are not considered as sensitive as single-family homes, but are still protected by City of Perris land use compatibility standards.

**Figure 4.10-1
Typical Decibel Level of Common Sounds**



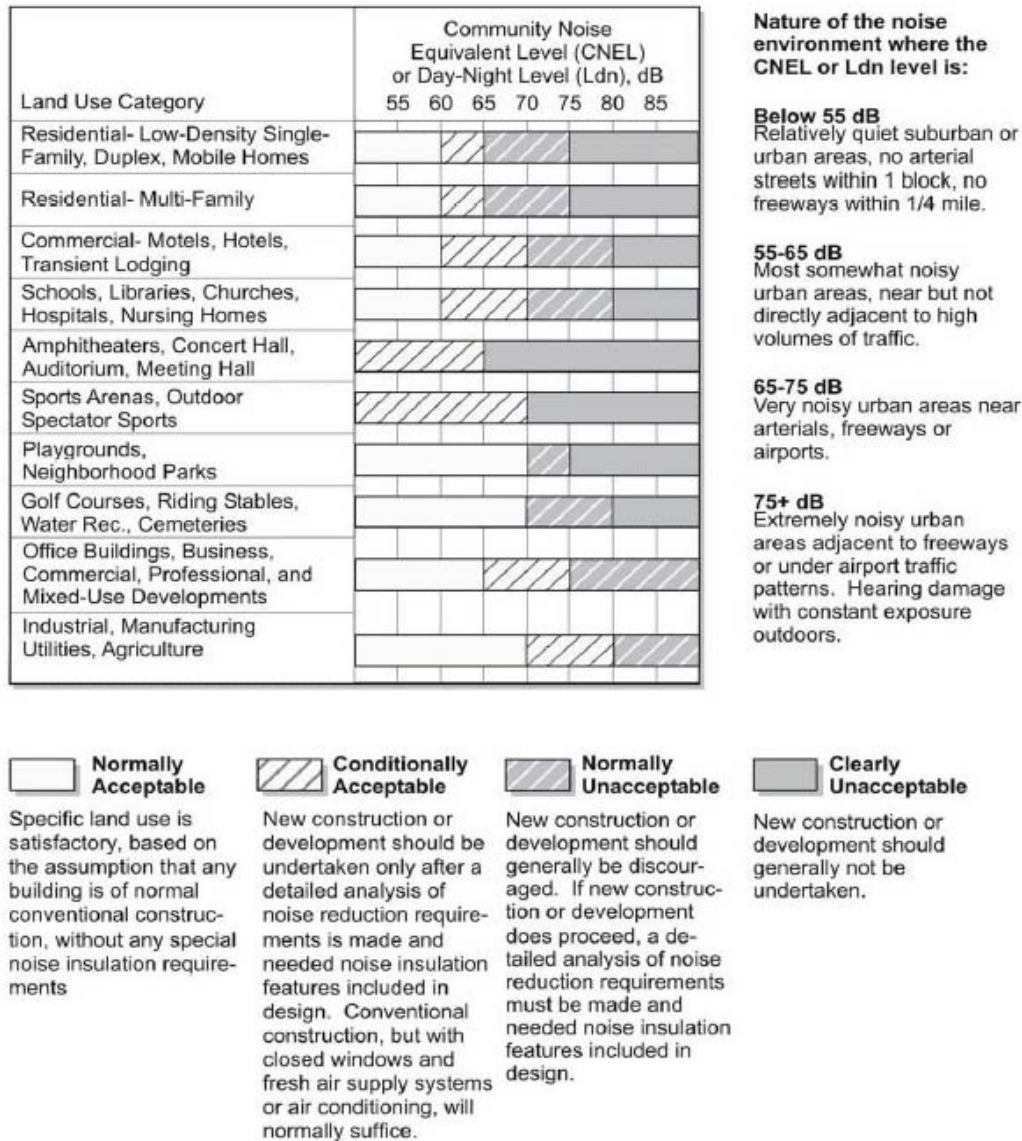
Source: California Airport Land Use Planning Handbook (January 2002), Page 6-5

Noise exposure standards have been developed by the State of California and recommended for inclusion into the Noise Element of local general plans. The City of Perris has adopted a modified version of the state guidelines in its Noise Element. **Figure 4.10-2, Land Use Compatibility for Community Noise Exposure**, shows the matrix of exterior noise exposures considered acceptable for various land uses. According to the data provided in **Figure 4.10-2**, exterior noise impacts upon industrial land uses are normally acceptable up to 70 dBA CNEL; and conditionally acceptable up to 80 dBA CNEL. In this regard, the phrase “normally acceptable” is defined by the City as “specified land use is satisfactory based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.” Likewise, the phrase “conditionally acceptable” is defined as “new construction or development should be undertaken only after detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.”

Existing Noise Levels

Existing noise levels throughout the vicinity of the proposed project derive mainly from vehicular sources on the surrounding roads. Elevated noise levels are typically confined to a narrow corridor along these roads. Project-related trips will be concentrated near the project site and then become progressively diluted as traffic spreads out throughout the region. In order to determine project-specific noise increases along the 17 roadway segments identified in the noise study, CNEL levels were calculated at a uniform but arbitrary distance of 50 feet from roadway centerline. The vehicle mix and speeds used to calculate the vehicular noise impacts were derived from Appendix D of the Noise Element from the City of Perris General Plan. The reference noise levels take into account the type of the roadway (i.e., Type 1, Type 2) which is indicative of the vehicle mix (see **Table 4.10-C** for details). The existing noise levels on roadways within the project vicinity are presented in **Table 4.10-A, Noise Levels at 50 Feet from Centerline Under Existing Conditions**.

Figure 4.10-2
Land Use Compatibility for Community Noise Exposure



The Community Noise Equivalent Level (CNEL) and Day-Night Noise Level (Ldn) are measures of the 24-hour noise environment. They represent the constant A-weighted noise level that would be measured if all the sound energy received over the day were averaged. In order to account for the greater sensitivity of people to noise at night, the CNEL weighting includes a 5-decibel penalty on noise between 7:00 p.m. and 10:00 p.m. and a 10-decibel penalty on noise between 10:00 p.m. and 7:00 a.m. of the next day. The Ldn includes only the 10-decibel weighting for late-night noise events. For practical purposes, the two measures are equivalent for typical urban noise environments.

Source: Exhibit N-1, City of Perris General Plan 2004, Noise Land Use/Noise Compatibility Guidelines.

Table 4.10-A
Noise Levels at 50 Feet from Centerline Under Existing Conditions

Road Segment	Existing	
	ADT ¹	dBA CNEL ²
Webster Avenue		
n/o Rider Street	--	--
n/o Morgan Street	2700	63.8
Indian Avenue		
n/o Placentia Avenue	2500	63.5
n/o Rider Street	3600	65.1
n/o Morgan Street	2700	63.8
n/o Ramona Expressway	100	49.5
n/o Markham Street	200	52.5
n/o Oleander Avenue	3400	64.8
Oleander Avenue		
e/o I-215	7500	68.3
w/o Indian Avenue	6200	67.4
Ramona Expressway		
w/o I-215	16400	71.7
e/o I-215	26200	73.7
w/o Webster Avenue	25200	73.5
w/o Indian Avenue	21000	72.7
e/o Indian Avenue	21500	72.8
Rider Street		
w/o Indian Avenue	2700	63.8
w/o Perris Boulevard	4200	65.7

¹ ADT = Average Daily Traffic

² CNEL = Community Noise Equivalent Level

Related Regulations

State of California Noise Insulation Standards

The California Commission of Housing and Community Development officially adopted noise standards in 1974. In 1988, the Building Standards Commission revised the noise standards (California Noise Insulation Standards).

State of California Vehicular Code

Recent studies have shown that the most objectionable feature of traffic noise is the sound produced by vehicles equipped with illegal or faulty exhaust systems. In addition, such vehicles are often operated in a manner that causes tire squeal and excessively loud exhaust noise. A number of California State vehicle noise regulations can be enforced by local authorities as well as the California Highway Patrol. These include § 23130, § 23130.5, § 27150, and § 38275 of the California Vehicle Code, as well as excessive speed laws, which may be applied to curtail traffic noise:

§ 23130 and § 23130.5 establish maximum noise emission limits for the operation of all motor vehicles at any time under any conditions of grade, load, acceleration, or deceleration.

§ 27150 require motor vehicles to be equipped with an adequate muffler to prevent excessive noise.

§ 38275 require off-highway motor vehicles to be equipped with an adequate muffler to prevent excessive noise.

The California Highway Patrol and the Department of Health Services (through local health departments) are available to aid local authorities in code enforcement and training pursuant to proper vehicle sound level measurements.

Municipal Code

Section 7.34.060 of the Municipal Code limits the hours of construction to between the hours of 7:00 a.m. and 7:00 p.m., Monday through Saturday. No construction activities are permitted outside of these hours and on Sundays and legal holidays, except for Columbus Day and Washington's Birthday. Construction activity shall also not exceed 80 dBA in residential zones in the City.

City of Perris Noise Element

The California Government Code requires that a noise element be included in the General Plan of each county and city in the state. The Noise Element of the City of Perris General Plan is intended to identify sources of noise and provide objectives and policies that ensure that noise from various sources does not create an unacceptable noise environment. It is a tool that City planners use to achieve and maintain compatible land uses with environmental noise levels. The Noise Element of the City's General Plan establishes exterior and interior noise standards for the evaluation of compatibility between land uses in the City. The guidelines adopted by the City of

Perris are included in the City's 2004 General Plan and is shown in **Figure 4.10-2, Land Use Compatibility for Community Noise Exposure**. The City specifies outdoor and indoor noise limits for new residential uses, places of worship, educational facilities, hospitals, hotels/motels, commercial, industrial, and other land uses. Exterior noise levels at new industrial projects may reach up to 80 dBA CNEL provided that conventional construction techniques are used and that fresh air supply systems and/or air conditioning are provided so that windows may be kept closed; thus providing acceptable exterior to interior noise reduction.

City of Perris General Plan Policies

As discussed above, one of the goals of the Noise Element of the General Plan is that future land uses are compatible with projected noise environments. For the proposed light industrial project, "Conditionally Acceptable" noise levels extend up to 80 dBA.

Another goal in the Noise Element of the General Plan is to mitigate stationary noise impacts, from non-residential land uses upon noise-sensitive land uses, to a normally acceptable level. The corresponding policy provides that commercial/industrial projects should mitigate noise impacts to an acceptable level as required by the State of California Noise/Land Use Compatibility Criteria. For residential uses, 60 dBA to 65 dBA is considered conditionally acceptable.

Additionally, the General Plan lists a change in 5 dBA as being readily discernable to most people in an exterior environment. Given that this would be an increase that would be considered reasonable for someone to perceive, an increase in 5 dBA will be used as a threshold of significance for impacts to sensitive land uses. Additionally, where 60 dBA is exceeded and the project causes an increase of 3 dBA or more at a sensitive land use, impacts are considered significant.

The specific General Plan goals, policies, and measures are as follows:

Noise Element

The City of Perris General Plan Noise Element contains goals, policies, and implementation measures applicable to the proposed project, as follows:

Goal I – Land Use Siting: Future land use compatible with project noise environments

Policy I.A: The State of California Noise/Land Use Compatibility Criteria shall be used in determining land use compatibility for new development.

Implementation Measure I.A.1: All new development proposals will be evaluated with respect to the State Noise/Land Use Compatibility Criteria. Placement of noise sensitive uses will be discouraged within any area exposed to exterior noise levels that fall into the "Normally Unacceptable" range and prohibited within areas exposed to "Clearly Unacceptable" noise ranges.

Goal V – Stationary Noise Sources: Future non-residential land uses compatible with noise sensitive land uses

Policy V.A: New large scale commercial or industrial facilities located within 160 feet of sensitive land uses shall mitigate noise impacts to attain an acceptable level as required by the State of California Noise/Land Use Compatibility Criteria.

Implementation Measure V.A.1: An acoustical impact analysis shall be prepared for new industrial and large scale commercial/industrial facilities to be constructed within 160 feet of the property line of any existing noise sensitive land use. This analysis shall document the nature of the commercial or industrial facility, as well as, all interior or exterior facility operations that would generate exterior noise. The analysis shall document the placement of any existing or proposed noise-sensitive land uses situated within the 160-foot distance. The analysis shall determine the potential noise levels that could be received at these sensitive land uses and specify specific measures to be employed by the large scale commercial or industrial facility to ensure that these levels do not exceed 60 dBA CNEL at the property line of the adjoining sensitive land use. No development permits or approval of land use applications shall be issued until the acoustic analysis is received.

The State of California Noise/Land Use Compatibility Criteria adopted by the City is shown in **Figure 4.10-2**. As shown on **Figure 4.10-2**, exterior noise levels at new industrial projects may reach up to 80 dBA CNEL provided that conventional construction techniques are used and that fresh air supply systems and/or air conditioning are provided so that windows may be kept closed; thus, providing acceptable exterior to interior noise reduction. This would be required for the quiet areas of the proposed buildings, such as offices; but not the active warehouse uses.

The noise impacts from construction are addressed in Appendix C of the Noise Element of the City of Perris General Plan 2030 (General Plan). The Noise Element defines construction noise as the following:

Noise levels will vary with the type of equipment and size of the active construction zone. Assuming that construction was to occur for 8-hours a day, the CNEL is calculated at 84 dBA at 50 feet (83 dBA CNEL for residential construction). The 65-dBA CNEL contour would fall at a distance of about 446 feet (397 feet for residential construction). The City recognizes that construction noise is difficult to control and has established allowable hours for this intrusion. Section 18-63 of the Municipal Code, “Enumeration of Prohibited Noises” provides an exemption for noise from construction and repair work as long as these activities are limited to between the hours of 7:00 a.m. and 6:00 p.m. on weekdays. Because construction activities are typically limited to weekdays during daylight hours, this noise impact is considered a nuisance or annoying, rather than a significant impact. Continued compliance with these restrictions will reduce construction noise impacts to a level considered less than significant.

Design Considerations

There are no aspects of the proposed project's design that would reduce noise impacts.

Thresholds of Significance

The City of Perris has not adopted its own of significance and, instead, defers to the thresholds of significance identified in Appendix G of the CEQA Guidelines. Based on Appendix G of the CEQA Guidelines, impacts related to and from noise may be considered potentially significant if the proposed project would:

- result in exposure of people to severe noise levels in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies;
- result in exposure of persons to or generation of excessive ground-born vibration or ground-born noise levels;
- result in substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project;
- result in exposure of people residing or working in the project area to excessive noise levels from airport noise; and/or
- result in substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.

There is no official “industry standard” of determining significance for noise impacts. However, typically, a jurisdiction will identify either a 3 dBA or 5 dBA increase as being the threshold because these levels represent varying levels of perceived noise increases. The City of Perris Noise Element in the General Plan states that a change in 5 dBA is “readily discernable to most people in an exterior environment.” Accordingly, an increase in 5 dBA is considered significant for all sensitive receptors along road segments that do not exceed 60 dBA. Additionally, per the City of Perris, for sensitive receptors, if the noise increase would meet or exceed the City's 60 dBA CNEL standard, then an increase of 3 dBA would also be considered significant.

Environmental Impacts Before Mitigation

Threshold: *Result in exposure of people to severe noise levels in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies.*

The proposed project involves the development of an approximately 1,191,080 square-foot distribution center on a 61.63-acre parcel. The distribution center will have 1,169,480 square feet of warehouse space and 21,600 square feet of office space. The project includes overflow trailer parking located on Metropolitan Water District's (MWD) property located immediately north of the project site. The project site is bounded by Indian Avenue to the east, Rider Street to the

south, and Webster Avenue to the west, approximately 556 feet east of Interstate 215 and 0.8 miles south of Ramona Expressway, in the City of Perris, Riverside County, California.

The surrounding existing land uses include: a distribution warehouse to the north; a crop field to the east; an auction facility to the south; and a crop field to the west. The surrounding General Plan land use designations include: Light Industrial and Public/Semi-Public Facilities/Utilities to the north; Light Industrial and Public/Semi-Public Facilities/Utilities to the east; Business Park to the south; and Light Industrial and Public/Semi-Public Facilities/Utilities to the west.

A total of 353 parking stalls have been designed to accommodate trailer parking on the project site. The project has loading docks located along the north side of the building with 131 truck bays; and, 123 truck bays are located along the south side of the building for a total of 254 truck bays. The hours of operation have not been established, as a future tenant of the proposed building has not yet been determined.

The guidelines adopted by the City of Perris are included in the City's 2004 General Plan and are shown in **Figure 4.10-2, Land Use Compatibility for Community Noise Exposure**. For the proposed light industrial project, "Normally Acceptable" noise levels extend up to 70 dBA CNEL and "Conditionally Acceptable" noise levels extend up to 80 dBA. The Noise Study shows that the proposed project is located in an environment exposed to noise levels approaching 74 dBA. For industrial uses, noise levels up to 80 dBA CNEL are considered "conditionally acceptable" which means the development of the proposed project will meet the applicable standards with conventional construction methods, including fresh air supply systems or air conditioning units. No further on-site noise mitigation is required.

For compatibility between future non-residential and noise sensitive land uses, General Plan Policy V.A requires new large scale commercial and industrial facilities located within 160 feet of sensitive land uses to mitigate noise impacts to an acceptable level as required by the State of California Noise/Land Use Compatibility Criteria.

Although this project involves the construction of a new large scale industrial facility, it is not located within 160 feet of sensitive land uses. The nearest sensitive receptor is located approximately 1,379 feet south of the project site. General Plan Policy V.A is very specific in that it applies only to sensitive receivers located within a 160-foot radius of new industrial and large-scale commercial facilities. The discussion of General Plan Policy V.A is included only for the purpose of drawing attention to the fact that no sensitive receivers exist within the policy's restricted radius, thereby meeting the policy's primary goal.

Since the project is speculative with no established tenants, the noise study was unable to analyze future on-site-generated impacts at a specific level. However, as the noise study indicated, certain noise-generating activities are typically associated with distribution facilities, such as trucks staging at loading docks, as well as loading dock activities. In lieu of specific data, the noise study provided general impact distances associated with these activities, with and without barriers, under nighttime conditions which are the conditions under which people are generally most sensitive. Based upon the reference data provided (representing noise sourced from trucks and loading dock activities, the maximum extent of unmitigated nighttime impacts extends up to

600 feet from the source) and the known distance to the nearest existing sensitive receiver (approximately 1,379 feet from the source), it was determined that the potential for adverse noise impacts upon that receiver are negligible and did not warrant further analysis. Therefore, this project complies with the goal of General Plan Policy V.A.

Operational activity noise from industrial center/warehousing operations would possibly derive from on-site loading or un-loading operations, or from on- and off-site movements. Materials-handling at cross-dock facilities occurs within the warehouse where truck trailers block any noise propagation through any open truck bay doors. An occasional ‘thump’ is audible when a forklift drives into a trailer to pick up or set down a pallet of materials, but such single-event noise is infrequent. If truck unloading occurs at night and in close proximity to residential uses, the low frequency thumps can be intrusive and sleep-disturbing if adjacent residences have open bedroom windows.

Nuisance potential is exacerbated if trailers are delivered or picked up at night. The impact of the fifth wheel on the trailer pin, cranking of the “landing gear”, hiss of air brake release, closure of trailer doors, and low-gear truck acceleration may increase the dock activity noise. Again, no specific impact distance can be reliably determined, but a doubled zone of partial impact is reasonably compared to loading dock operations without truck movement. **Table 4.10-B, Zone of Potential Noise Impact**, provides distances from the loading activity noise source to which impacts could extend, relative to the nearest residences.

Table 4.10-B
Zone of Potential Noise Impact

Activity	No Mitigation (feet)	With Mitigation (feet)
Loading dock only	300	100
Loading dock and truck/trailer movements	600	200

Ways to reduce this operational noise would typically entail a solid barrier that completely blocks the line-of-sight between the source and the receiver. Daytime operational noise is not considered a source of significant impact if a barrier shields the visibility of the loading activity from any ground-floor observers. Activities that occur at the rear of buildings, with no direct line-of-sight to residences; and not directly adjacent to the sensitive land uses; will be shielded by the building itself.

For this project, the closest sensitive receptor is 1,379 feet from the project site, well beyond the 600-foot zone of potential noise impact without mitigation; therefore, the noise impact from on-site operations is considered **less than significant. No further mitigation is required.**

Threshold: *Result in the exposure of persons to or generation of excessive ground-born vibration or ground-born noise levels.*

Vibration refers to groundborne noise and perceptible motion. Typical sources of groundborne vibration are construction activities (e.g., blasting, pile driving, and operating heavy-duty earthmoving equipment), steel-wheeled trains, and occasional traffic on rough roads. Groundborne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors, where the motion may be discernable but without the accompanying effects (e.g., shaking of a building).

Groundborne vibration is measured in terms of the velocity of the vibration oscillations. When the velocity of the vibration oscillations exceeds 0.1 inch per second (in/sec), it is generally perceived as annoying to occupants of buildings. The degree of annoyance is dependent upon type of land use, individual sensitivity to vibration, and the frequency of the vibration events. Typically, vibration levels must exceed 0.2 in/sec before building damage occurs.

Problems with groundborne vibration and noise are usually localized to areas within about 100 feet from the vibration source, although there are examples of groundborne vibration causing interference out to distances greater than 200 feet.

The proposed project is not located near steel-wheeled trains as the closest railroad is approximately 0.15 miles west of the project site, on the opposite side of the I-215 freeway. Additionally, roadways in the project area are either paved or would be paved and would not result in traffic driving over rough roads. Due to the distance from the project site, groundborne vibration from grading construction equipment, such as earthmovers and haul trucks at 10 feet, would not create vibration amplitudes that would cause damage to nearby structures.

The construction of the proposed project would not generate groundborne vibration that would impact the closest sensitive receptors (the residences to the south) as these receptors are approximately 1,379 feet away the project's southernmost boundary. Therefore, impacts from construction-related groundborne vibration would be **less than significant** and no mitigation would be required.

Threshold: *Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.*

Construction noise will result in a temporary change in ambient noise levels. Noise generated by construction equipment, including trucks, graders, bulldozers, concrete mixers, and portable generators, can reach significant levels ranging from 70 dBA to 105 dBA at 50 feet from noise source (**Figure 4.10-3, Typical Construction Equipment Noise Levels**).

As a rule of thumb, noise from point sources, such as construction equipment, will decrease by 6 dBA for every doubling of distance away from the receptor. For example, when the construction equipment is 100 feet from the sensitive receptor, the decibel level would be 6 dBA lower than when it is 50 feet from the sensitive receptor and 12 dBA lower than the level it is at 50 feet when it is 200 feet from the sensitive receptor. Therefore, actual construction noise levels at each

sensitive receptor may be somewhat less depending upon its distance from construction activity. The level of impact will depend upon several factors: 1) the distance between construction activity and the sensitive receptors, 2) the types of equipment used, and 3) the hours of construction operations, among others.

Section 7.34.060 of the Municipal Code limits the hours of construction to between the hours of 7:00 a.m. and 7:00 p.m., Monday through Saturday. No construction activities are permitted outside of these hours and on Sundays and legal holidays, except for Columbus Day and Washington's Birthday. Because construction activities are typically limited to weekdays, during daylight hours, this noise impact is considered a nuisance or annoying, rather than a significant impact. Continued compliance with these restrictions will reduce construction noise impacts to a level considered less than significant.

The closest sensitive land use is located approximately 1,379 feet south of the site, located on the west side of Susan Lane. Since the sensitive land use is located further away from the site than 446 feet, the potential for construction noise to affect any sensitive receptors is considered **less than significant**.

**Figure 4.10-3
Typical Construction Equipment Noise Levels**

EQUIPMENT			NOISE LEVEL (dBA) AT 50 FEET					
			60	70	80	90	100	110
EQUIPMENT POWERED BY INTERNAL COMBUSTION ENGINES	EARTH MOVING	Compactors (Rollers)						
		Front Loaders						
		Backhoes						
		Tractors						
		Scrapers, Graders						
		Pavers						
		Trucks						
	MATERIAL HANDLING	Concrete Mixers						
		Concrete Pumps						
		Cranes (Moveable)						
		Cranes (Derrick)						
	STATIONARY	Pumps						
		Generators						
		Compressors						
IMPACT EQUIPMENT		Pneumatic Wrenches						
		Jack Hammers and Rock Drills						
		Pile Drivers						
OTHER		Vibrators						
		Saws						

Threshold: *Result in substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.*

For the purposes of this section, a substantial permanent increase at a sensitive receptor location is defined as follows:

- an increase of 3 dBA or more from existing noise levels where the 60 dBA noise standard for sensitive receptors is exceeded; and/or
- an increase of 5 dBA or more from existing noise levels at all other sensitive receptor locations.

Operational activity noise from industrial center/warehousing operations would possibly derive from on-site loading or un-loading operations, or from on- and off-site movements. Materials-handling at cross-dock facilities occurs within the warehouse where truck trailers block any noise propagation through any open truck bay doors. An occasional ‘thump’ is audible when a forklift drives into a trailer to pick up or set down a pallet of materials, but such single-event noise is infrequent. If truck unloading occurs at night and in close proximity to residential uses, the low frequency thumps can be intrusive and sleep-disturbing if adjacent residences have open bedroom windows.

According to the Noise Study, the closest sensitive receptor is 1,379 feet from the project site, well beyond the 600-foot zone of potential noise impact (referred to on pages 4.10-11 and 12) without mitigation; therefore, the **noise impact from on-site operations is considered less than significant. No further mitigation is required.**

The proposed project will contribute noise to the existing environment through the addition of traffic on local streets. The additional traffic noise generation was evaluated in the project’s noise study (Appendix I) which relied on traffic data from the project-specific traffic study (Appendix J).

Off-site noise levels were calculated along road segments in the project vicinity for existing conditions (2008), existing plus project (2011), and cumulative plus project (2011), which includes traffic generated by the project and other known projects in the vicinity.

Future noise impacts resulting from vehicular traffic on roadways were modeled using the California specific vehicle noise curves (CALVENO) in the LeqV2 computer program. LeqV2 is a mainframe computer implementation of the FHWA Highway Traffic Noise Prediction Model (FHWA-RD-77-108) and was developed by the California Department of Transportation (Caltrans) in the early 1980s. The program evaluates noise at one receptor from up to eight (8) straight roadway lanes and is very useful in predicting noise impacts in simple scenarios. Site-specific information is entered, such as: traffic volumes, distances, and speeds; and adjustments can be made for the use of noise barriers. The vehicle mix and speeds used to calculate the vehicular noise impacts were derived from Appendix D of the Noise Element from the City of Perris General Plan. The reference noise levels take into account the type of the roadway (i.e.,

Type 1, Type 2) which is indicative of the vehicle mix. **Table 4.10-C, City of Perris Standard Vehicle Mix (Percent)**, shows the percent of each type of vehicle per type of route.

Table 4.10-C
City of Perris Standard Vehicle Mix (Percent)

Route Type	Auto	Medium Truck	Heavy Truck
Type 1	95.22	3.24	1.54
Type 2	90.94	4.06	5.00

Analysis of area-wide noise impacts from project-related traffic was done by calculating the noise levels at an arbitrary distance of 50 feet from the centerline of each road. The formulae used are shown in Appendix A of the noise study. In addition, the site is treated as a “hard” site, which allows for a 3 dBA reduction for each doubling of the distance from the noise source to receiver.

None of the 17 roadway segments that were analyzed in the Traffic Study are adjacent to existing sensitive receptors. Therefore, an increase of 5 dBA or greater above that of existing levels is considered substantial. **Table 4.10-D, Area-Wide Noise Levels at 50 Feet from Centerline** shows that the proposed project itself will not result in a substantial increase in noise levels along any of the modeled road segments.

Table 4.10-D
Area-Wide Noise Levels at 50 Feet from Centerline

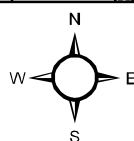
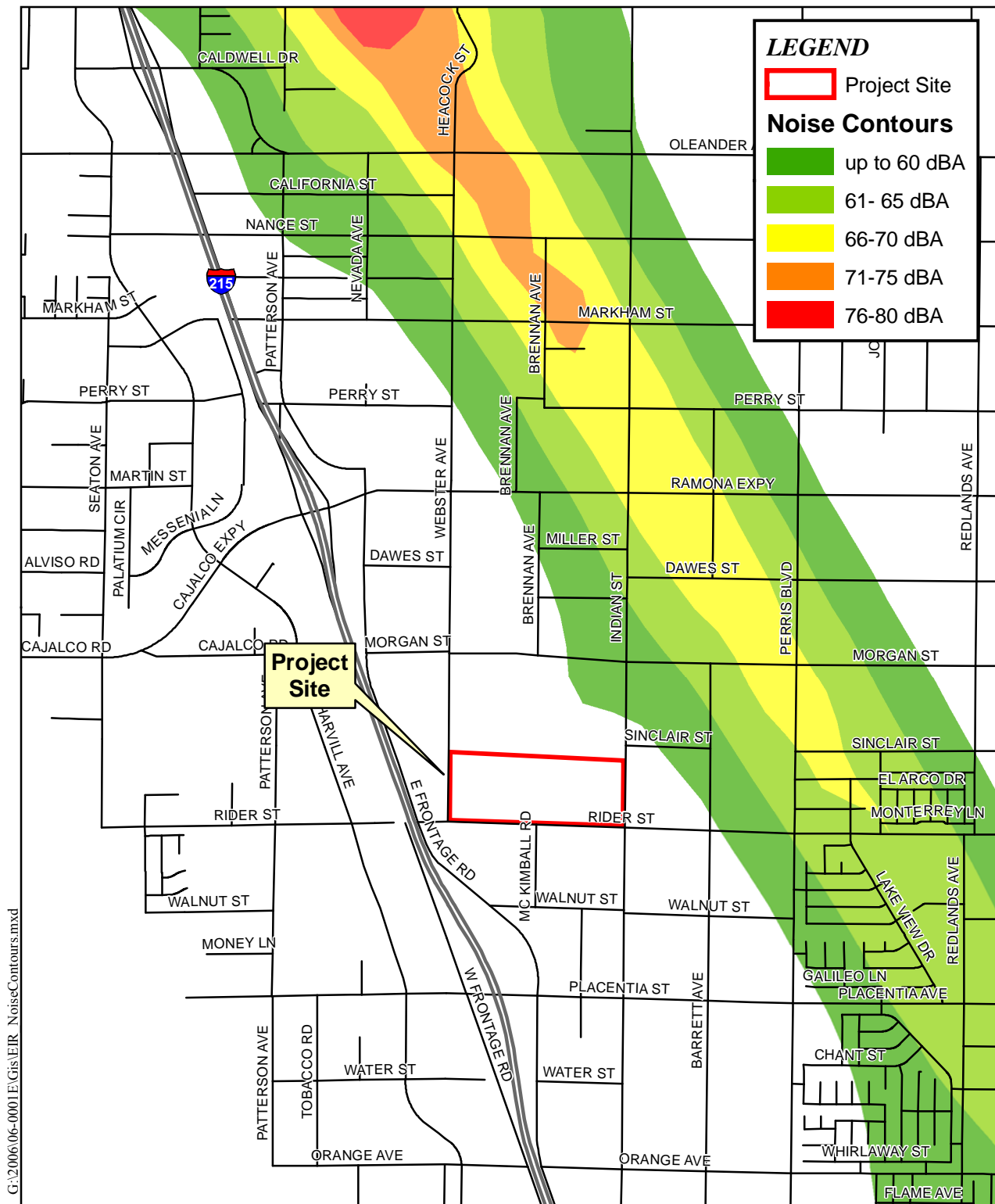
Road Segment	Existing		Existing Plus Ambient Growth Plus Cumulative Plus Project						Total Increase Compared to Existing Conditions
	ADT	dBA CNEL	Existing + Ambient Growth + Cumulative		Project Only		Existing + Ambient Growth + Cumulative + Project Combined Total	Project- Specific Increase	
			ADT	dBA CNEL	ADT	dBA CNEL			
Webster Avenue									
n/o Rider Street	--	--	400	55.5	400	55.5	58.5	3.0	58.5
n/o Morgan Street	2700	63.8	4000	65.5	100	49.5	65.6	0.1	1.8
Indian Avenue									
n/o Placentia Avenue	2500	63.5	8900	69.0	100	49.5	69.0	0.0	5.5
n/o Rider Street	3600	65.1	11000	69.9	1900	62.3	70.6	0.7	5.5
n/o Morgan Street	2700	63.8	13900	70.9	1900	62.3	71.5	0.6	7.7
n/o Ramona Expressway	100	49.5	6600	67.7	1700	61.8	68.7	1.0	19.2
n/o Markham Street	200	52.5	11700	70.2	1700	61.8	70.8	0.6	18.3
n/o Oleander Avenue	3400	64.8	7700	68.4	200	52.5	68.5	0.1	3.7

Oleander Avenue									
e/o I-215	7500	68.3	44100	76.0	1500	61.3	76.1	0.1	7.8
w/o Indian Avenue	6200	67.4	34800	74.9	1500	61.3	75.1	0.2	7.7
Ramona Expressway									
w/o I-215	16400	71.7	39000	75.4	100	49.5	75.4	0.0	3.7
e/o I-215	26200	73.7	55500	77.0	200	52.5	77.0	0.0	3.3
w/o Webster Avenue	25200	73.5	50900	76.6	200	52.5	76.6	0.0	3.1
w/o Indian Avenue	21000	72.7	45400	76.1	100	49.5	76.1	0.0	3.4
e/o Indian Avenue	21500	72.8	42000	75.7	100	49.5	75.7	0.0	2.9
Rider Street									
w/o Indian Avenue	2700	63.8	3600	65.1	1400	61.0	66.5	2.7	2.7
w/o Perris Boulevard	4200	65.7	7000	68.0	200	52.5	68.1	0.1	2.4

Table 4.10-D shows that when the Project traffic is added to Existing plus Ambient Growth plus Cumulative conditions, the highest project-specific increase is 3 dBA (on Webster Avenue north of Rider Street) where there are no sensitive receptors. Additionally, this segment of Webster Avenue is located approximately 500 feet west from I-215 where there are no noise control barriers. The resulting CNEL from the addition of 400 ADT on Webster Avenue, in this proximity to unmitigated freeway noise, would be sufficiently masked. Furthermore, without nearby sensitive receptors, the 5 dBA threshold of significance would apply. Because the 3 dBA increase is less than the 5 dBA threshold, the project will not result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project, and potential impacts are considered **less than significant**.

***Threshold:** Result in exposure of people residing or working in the project area to excessive noise levels from airport noise.*

Being located approximately 1.9 miles south-southeast of March Air Reserve Base (MARB), the project site could be impacted by airport-related noise from the airport's flight path. However, as shown on **Figure 4.10-4, MARB Noise Contours**, the project's site is located outside of the minimum reported noise contour (60 dBA CNEL) for MARB. Therefore, the project will not result in the exposure of people residing or working in the project area to excessive levels noise levels from airport operations, and **the impact to the project from airport noise is considered less than significant**.



0 2,500 5,000
Feet

Figure 4.10-4
MARB Noise Contours

Proposed Mitigation Measures

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (CEQA Guidelines, Section 15126.4). Mitigation measures were evaluated for their ability to eliminate or reduce the potential significant adverse impacts related to noise to below the level of significance. As there were no project-related significant impacts to sensitive receptors, no mitigation measures are necessary.

Summary of Environmental Effects After Mitigation Measures are Implemented

Potential impacts related to private airport noise were found to be less than significant in the Initial Study/NOP prepared for this project (Appendix A). Additionally, with regulation compliance potential impacts related to the exposure of people to severe noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels; substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project; substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project; and exposure of people residing or working in the project area to excessive noise levels from airport noise were found to be less than significant without mitigation.

4.11 SOLID WASTE

Potential impacts related to solid waste services were found to be potentially significant in the Initial Study/NOP prepared for this project (Appendix A). Therefore, the focus of the following discussion is related to the potential impacts from solid waste generated by the project.

In addition to other reference documents, the following references were used in the preparation of this section of the DEIR:

- California Integrated Waste Management Board, *Facility/ Site Summary Details (Lamb Canyon, El Sobrante, and Badlands Landfills)*, Solid Waste Information System (SWIS). (Available at www.ciwmb.ca.gov/SWIS/, accessed on February 5, 2007.)
- California Integrated Waste Management Board, *Jurisdictional Profile for Riverside County (Unincorporated)*, (Available at www.ciwmb.ca.gov/Profiles/Juris/JurProfile1.asp?RG=U&JURID=410&JUR=Riverside%2DUnincorporated, accessed on March 27, 2007.)
- California Integrated Waste Management Board, *Estimated Solid Waste Generation Rates for Commercial Establishments*, February 1, 2007. (Available at www.ciwmb.ca.gov/wastechar/WasteGenRates/Commercial.htm, accessed on February 5, 2007.)
- California Integrated Waste Management Board, *Construction and Demolition Materials*. (Available at www.ciwmb.ca.gov/ConDemo/Materials/default.htm, accessed on February 5, 2007.)
- California Integrated Waste Management Board, *C&D Recycling Plans and Policies: A Model for Local Government Recycling and Waste Reduction*, Publication #310-01-014, January 2002. (Available at www.ciwmb.ca.gov/Publications/LocalAsst/31001014.pdf, accessed on February 5, 2007.)
- City of Perris, *City of Perris General Plan 2030*, July 12, 2005. (Available at the City of Perris and at www.cityofperris.org/city-hall/general-plan.html, accessed on January 28, 2009.)
- City of Perris, *City of Perris General Plan 2030 Draft EIR*, October 2004. (Available at the City of Perris and at www.cityofperris.org/city-hall/general-plan.html, accessed on January 28, 2009.)
- Personal communication with Sung Key Ma, Planner IV, Riverside County Waste Management Department, March 27, 2007.
- U.S. Environmental Protection Agency, Municipal and Industrial Solid Waste Division, Office of Solid Waste Report No. EPA 530-R-98-010, *Characterization of Building-Related Construction and Demolition Debris in the United States*, by Franklin Associates, June 1998. (Available at www.epa.gov/epaoswer/hazwaste/sqg/c&d-rpt.pdf, accessed on January 16, 2007.)

Setting

Solid waste collection within the City of Perris is provided by CR&R Disposal. Waste collected is transported to Perris Materials Recovery Facility at 1706 Goetz Road where recyclable materials are separated from solid waste. The solid waste is then transported to either the El Sobrante Landfill or the Badlands Landfill. Both landfills are Class III municipal solid waste landfills. As Class III landfills, the landfills accept primarily non-hazardous residential and commercial/industrial municipal solid waste.

The project site is located approximately 9 miles southwest of the Badlands Landfill, located northeast of the City of Moreno Valley at 31125 Ironwood Avenue, and accessed from State Highway 60 at Theodore Avenue. The landfill is a regional municipal solid waste landfill that is owned and operated by Riverside County. The existing landfill encompasses 1,168.3 acres, of which 150 acres are permitted for refuse disposal and another 96 acres are designated for existing and planned ancillary facilities and activities. The landfill is currently permitted to receive 4,000 tons per day and has an overall remaining disposal capacity of approximately 8.653 million tons, as of January 1, 2007. The Badlands Landfill is projected to reach capacity at the earliest time, in January 2011. During 2006, the Badlands landfill accepted a daily volume of 2,195 tons and a yearly total of approximately 676,104 tons. Further landfill expansion potential exists at the Badlands Landfill site.

The project site is located approximately 14 miles east of the El Sobrante Landfill, a Riverside County regional municipal solid waste landfill. The El Sobrante Landfill is located east of Interstate 15 and Temescal Canyon Road to the south of the City of Corona and Cajalco Road at 10910 Dawson Canyon Road. The landfill encompasses 1,322 acres, of which 645 acres are permitted for landfilling. The El Sobrante Landfill is currently permitted to receive 10,000 tons of refuse per day (tpd), of which 4,000 tpd is reserved for refuse generated within Riverside County. The landfill has a total capacity of approximately 109 million tons or 184.93 million cubic yards, of which approximately 48 million tons are reserved for in-County waste. As of January 1, 2007, the landfill had a remaining in-County disposal capacity of approximately 37.446 million tons. During the year of 2006, the El Sobrante Landfill accepted a total of approximately 2.181 million tons of waste, of which approximately 1.106 million tons were generated within Riverside County. The 2006 daily average for in-County waste was 3,590 tons. The landfill is expected to reach capacity in approximately 2031.

Related Regulations

State

The California Integrated Waste Management Act of 1989 (AB 939) redefined solid waste management in terms of both objectives and planning responsibilities for local jurisdictions and the state. The act was adopted in an effort to reduce the volume and toxicity of solid waste that is landfilled and incinerated by requiring local governments to prepare and implement plans to improve the management of waste resources. AB 939 required each of the cities and unincorporated portions of the counties to divert a minimum of 25 percent of the solid waste landfilled by 1995 and 50 percent by the year 2000. To attain goals for reductions in disposal,

AB 939 established a planning hierarchy utilizing new integrated solid waste management practices. These practices include source reduction, recycling and composting, and environmentally safe landfill disposal and transformation.

Other state statutes pertaining to solid waste include compliance with the California Solid Waste Reuse and Recycling Act of 1991 (AB 1327), which requires adequate areas for collecting and loading recyclable materials within the project site.

County

The Countywide Integrated Waste Management Plan (CIWMP) was prepared in accordance with state requirements as set forth in AB 939. The CIWMP is comprised of the Countywide Summary Plan; the Countywide Siting Element; and the Source Reduction and Recycling Elements, Household Hazardous Waste Elements, and Non-disposal Facility Elements for Riverside County and each of the cities in Riverside County. The Riverside County Waste Management Department administers recycling programs available to county residents that are normally advertised through mass media, such as newspapers, radio, television, and billboards.

On September 23, 1998, the CIWMB approved the Riverside County Integrated Waste Management Plan (CIWMP). This document (comprised of the Countywide Summary Plan, the Countywide Siting Element, and the County's and each of its cities' Source Reduction and Recycling Elements, Household Hazardous Waste Elements and Nondisposal Facility Elements) was prepared in compliance with the Integrated Waste Management Act of 1989 (AB 939, et seq.) for the purpose of defining programs and policies to reduce waste disposal by 25 percent in 1995 and 50 percent by the year 2000. Pertaining specifically to the project site, the CIWMP requires that all new industrial development provide adequate onsite storage areas for waste generated by the land use.

Design Considerations

The project site design will include enclosed areas for dumpsters. Dumpsters will be provided for solid waste materials. The design of the on-site waste collection facilities will allow for efficient and safe waste collection of the project waste stream and will comply with Riverside County Waste Management Department requirements for recyclables collection and loading areas.

Thresholds of Significance

The City of Perris has not adopted its own thresholds of significance and, instead, defers to the thresholds of significance identified in Appendix G of the CEQA Guidelines. Based on Appendix G of the CEQA Guidelines, impacts related to solid waste services may be considered potentially significant if the proposed project would:

- be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs.

Environmental Impacts Before Mitigation

***Threshold:** Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs.*

Construction-Related Solid Waste

Statewide, construction and demolition (C&D) debris constituted approximately 22 percent of solid waste disposed in California in 2004. In Riverside County, C&D waste alone constitutes approximately 8.8 percent of the countywide waste stream by weight. **Table 4.11-A, Estimated Construction-Related Solid Waste Generation and Contribution** shows the amounts of construction-related waste anticipated to be generated by the project during construction.

Given the limited contribution of construction-related solid waste anticipated to be generated by the proposed project (approximately 0.045 percent of the annual landfill capacity), development of the project site will not substantially contribute to the exceedance of the permitted capacity of the designated landfills. Also, considering the project's participation in the source reduction programs required by the City, which requires a 50 percent disposal reduction, the solid waste stream generated by the project during construction will be reduced. Therefore, the proposed project will not be served by landfills with insufficient capacity to accommodate the project's solid waste needs during construction and **potential impacts to existing landfills will be less than significant.**

**Table 4.11-A
Estimated Construction-Related Solid Waste Generation
and Contribution**

Proposed Project Total Square Footage	Generation Factor ¹	Proposed Project Total (tons)	Disposal Facility - Disposal Capacity ² (tons per year)	Proposed Project Percent of Yearly Intake
1,191,080 square feet	3.89 lbs per sq.ft.	2,317	Badlands Landfill – 1,460,000	0.159
			El Sobrante Landfill – 3,650,000	0.063
			TOTAL LANDFILL CAPACITY – 5,110,000	0.045

¹ Generation rate from “Characterization of Building-Related Construction and Demolition Debris in the United States” prepared for U.S. Environmental Protection Agency by Franklin Associates, June 1998; as referenced by CIWMB. This rate includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.

² Daily disposal capacity multiplied by 365 days per year.

Operational Solid Waste

Following construction of the proposed project, the majority of the waste generated (approximately 30 percent for commercial and business park uses) is expected to be paper products. **Table 4.11-B, Anticipated Solid Waste Generation and Contribution**, shows the amounts of waste anticipated to be generated by the project following construction. Recycling of both paper and C&D waste generated both during and after construction can greatly reduce the amount of waste directed into landfills.

The Riverside County Waste Management Department and the Riverside County Department of Health Services implement programs, such as AB 939, that address source reduction with the aim of reducing the amount of solid waste going into landfills. The proposed project is located within the City of Perris, which participates in these programs. As seen in **Table 4.11-B**, solid waste generated by the proposed project will contribute a negligible percentage of the solid waste taken to any of the landfills that will serve the project in relation to the maximum yearly intake.

Given the limited contribution of solid waste anticipated to be generated by the proposed project (approximately 0.055 percent of the annual landfill capacity), development of the project site will not substantially contribute to the exceedance of the permitted capacity of the designated landfills. Also, considering the project's participation in the source reduction programs offered by the City, the solid waste stream generated by the project may be reduced over time. Therefore, the proposed project will not be served by landfills with insufficient capacity to accommodate the project's solid waste disposal needs and potential impacts to existing landfills will be **less than significant**.

Table 4.11-B
Anticipated Solid Waste Generation and Contribution

Proposed Project Total Square Footage	Generation Factor ¹	Proposed Project Total (tons/ year)	Disposal Facility - Disposal Capacity ² (tons per year)	Proposed Project Percent of Yearly Intake ³
1,191,080 square feet	13 lb/1000 sq. ft/day	2,826	Badlands Landfill – 1,460,000	0.194
			El Sobrante Landfill – 3,650,000	0.077
			TOTAL LANDFILL CAPACITY – 5,110,000	0.055

¹ Waste disposal rates from California Integrated Waste Management Board (www.ciwmb.ca.gov).

² Daily permitted throughput (tons/day) x 365.

³ (Proposed Project Total / Disposal Facility Capacity) x 100

Proposed Mitigation Measures

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (CEQA Guidelines, Section 15126.4). Mitigation measures were evaluated for their ability to eliminate the potential significant adverse impacts upon solid waste facilities or to reduce impacts to below the level of significance. However, impacts associated with the proposed project upon the provision of solid waste services are considered to be less than significant without mitigation. Therefore, no mitigation measures are required.

Summary of Environmental Effects After Mitigation Measures Are Implemented

Less than significant impacts at the project-specific level related to solid waste disposal are expected to occur without any mitigation.

4.12 TRANSPORTATION/TRAFFIC

Potential impacts related to air traffic, increased hazards due to a design feature or incompatible use, inadequate emergency access, and inadequate parking were all found to be less than significant in the Initial Study/NOP prepared for this project (Appendix A). The focus of the following discussion is related to the potential impacts associated with an increase in traffic in relation to the existing traffic load and capacity of the street system; an exceedance, either individually or cumulatively, of established congestion management agency levels of service; and conflicts with adopted policies, plans, or programs supporting alternative transportation.

Riverside County Transportation Commission (RCTC) is designated as the Congestion Management Agency (CMA) to oversee the Congestion Management Program (CMP). RCTC approved the modification of the CMP Land Use Coordination Element, which includes the elimination of the Traffic Impact Assessment (TIA) report process and replacing it with an Enhanced Traffic Monitoring System. Prior to this modification of the CMP, a TIA report had to be prepared consistent with the CMP/Local Agency Guidelines whenever a proposed development generated greater than 200 peak hour trips. However, as of July 1, 1997, assessing these impacts consistent with the CMP guidelines is no longer required by RCTC. Therefore, although City of Perris' Initial Study Checklist includes a reference to CMA levels of service, for the purposes of this analysis, City of Perris General Plan will be used as the guiding document for acceptable levels of service against which impacts are measured.

In addition to other documents, the following references were used in the preparation of this section of the DEIR:

- Albert A. Webb Associates, *Traffic Impact Study Report, Rados Distribution Center – Perris (P07-0119)*, November 7, 2008. (Appendix J)
- Albert A. Webb Associates, *Addendum to Traffic Impact Study Report, Rados Distribution Center – (P07-0119), City of Perris, CA dated November 7, 2008*, September 9, 2009. (Appendix J)
- City of Perris, *City of Perris General Plan 2030*, July 12, 2005. (Available at the City of Perris and at www.cityofperris.org/city-hall/general-plan.html, accessed on February 27, 2008.)

The *Traffic Impact Study Report* (Traffic Study) for the project was prepared by Albert A. Webb Associates (see Appendix J). The Traffic Study findings are summarized within this section of the DEIR.

The objectives of the Traffic Study were to:

- determine existing traffic conditions in the vicinity of the proposed project;
- evaluate the traffic generated from the proposed development;

- determine existing plus project traffic conditions – existing volumes, plus three percent per year ambient growth¹, plus project generated traffic;
- determine cumulative plus project traffic conditions – existing volumes, plus three percent ambient growth, plus project traffic, plus cumulative² traffic; and
- determine if the level of service required by the City of Perris General Plan will be maintained at all affected intersections and, if not, determine the mitigation measures that will be necessary in order to maintain the required level of service.

Traffic analysis uses the Level of Service (LOS) system of categorization to evaluate the project area roadway intersections. Traffic engineers use this LOS system of categorization to describe how well an intersection or roadway is functioning. The LOS measures several factors including operating speeds, freedom to maneuver, traffic interruptions, and average vehicle delay at intersections. The LOS approach uses a ranking system, similar to education, with level ‘A’ being best and level ‘F’ being worst. **Table 4.12-A, Level of Service (LOS) Standards**, describes LOS levels in terms that the average driver can understand.

Table 4.12-A
Level of Service (LOS) Standards

Level of Service (LOS)	Signalized Intersections: Stopped Delay (seconds/vehicle)	Unsignalized Intersections: Stopped Delay (seconds/vehicle)	Qualitative LOS Description
A	≤ 10	≤ 10	Free flow: Low volumes; high speeds; speed not restricted by other vehicles; all signal cycles clear with no vehicles waiting through more than one signal cycle.
B	> 10 and ≤ 20	> 10 and ≤ 15	Stable flow: Operating speeds beginning to be affected by other traffic; between 1% and 10% of the signal cycles have one or more vehicles waiting through more than one signal cycle during peak traffic periods.
C	> 20 and ≤ 35	> 15 and ≤ 25	Stable Flow, Increased Density: Operating speeds and maneuverability closely controlled by other traffic; between 11% and 30% of the signal cycles have one or more vehicles waiting through more than one signal cycle during peak traffic periods; recommended ideal design standards.
D	> 35 and ≤ 55	> 25 and ≤ 35	Stable Flow, High Density: Tolerable operating speeds; 31% to 70% of the signal cycles have one or more vehicles waiting through more than one signal cycle during peak traffic periods; often used as design standards in urban areas.
E	> 55 and ≤ 80	> 35 and ≤ 50	Flow at or Near Capacity: maximum traffic volume an intersection can accommodate; restricted speeds; 71% to 100% of the signal cycles have one or more vehicles waiting through more than one signal cycle during peak traffic periods.
F	> 80	> 50	Forced or Breakdown Flow: Long queues of traffic; unstable flow; stoppages of long duration; traffic volume and traffic speed can drop to zero; traffic volume will be less than the volume occurring at LOS ‘E’ due to decreased speeds.

¹ Ambient growth accounts for unknown area growth in traffic volumes due to the development of projects outside the study area and also general growth in traffic due to changes in neighboring communities which cannot be accurately modeled.

² Cumulative projects account for other approved and pending projects located within the project vicinity.

Setting

The project site consists of approximately 61.63 acres located at the northeast corner of Rider Street and Webster Avenue, in the City of Perris. The project site is rectangular in shape and is bounded by Webster Avenue on the west, Rider Street on the south, and Indian Avenue on the east. The location of the proposed project site and its surrounding roadway system are shown on **Figure 4.12-1, Existing Roadway System**.

The following is a general list of major roadways that provide service to the area:

- **Ramona Expressway** – Ramona Expressway is an east-west roadway located approximately three-quarters of a mile north of the proposed project site. This roadway runs between Interstate 215 and Highway 74, east of the City of Hemet. Ramona Expressway is designated as a four-lane Expressway in the City of Perris General Plan Circulation Element, with a future expansion (year 2030) to six lanes along its entire stretch through the City of Perris.
- **Perris Boulevard** – Perris Boulevard is a north-south roadway located approximately one-half mile east of the proposed project site. Between Harley Knox Boulevard (formerly Oleander Avenue) and Ramona Expressway, this roadway is designated by the City of Perris General Plan's Circulation Element as a four-lane divided Arterial, with an ultimate 128-foot right-of-way.
- **Indian Avenue** – Indian Avenue is a north-south roadway that runs adjacent to the east side of the proposed project site. Between Harley Knox Boulevard and Ramona Expressway, this roadway is designated by the City of Perris General Plan's Circulation Element as a four-lane Secondary Arterial, with an ultimate 94-foot right-of-way.
- **Webster Avenue** – Webster Avenue is a north-south roadway that runs adjacent to the west side of the proposed project site. This roadway is designated by the City of Perris General Plan's Circulation Element as a four-lane Secondary Arterial, with an ultimate 94-foot right-of-way.
- **Interstate 215** – Interstate 215 (I-215) is a northwest-southeast six-lane freeway located west of the proposed project site at an approximate distance that ranges from 500 feet (at the south end) to 800 feet (at the north end). It connects the San Bernardino area to the north with the Riverside area and the Perris, Sun City, Temecula areas to the south. The nearest I-215 freeway interchanges to the project site are currently at Ramona Expressway or Harley Knox Boulevard, approximately three-quarters and two and one-quarter miles northwest of the project site, respectively.
- **Harley Knox Boulevard (formerly Oleander Avenue)** – Harley Knox Boulevard is an east-west roadway that is located approximately one and one-half miles north of the proposed project site. Harley Knox Boulevard is currently a two-lane undivided road from Patterson Avenue to Indian Avenue and a dirt road from Indian Avenue, east to Murrieta Road. This roadway is designated by the City of Perris General Plan's Circulation Element as an Arterial Highway (six-lane divided road) with an ultimate 128-foot right-of-way.

- **Rider Street** – Rider Street is an east-west roadway that runs adjacent to the south side of the proposed project site. This roadway is designated by the City of Perris General Plan's Circulation Element as a four-lane Secondary Arterial, with an ultimate 94-foot right-of-way.
- **Morgan Street** – Morgan Street is an east-west roadway located approximately one-quarter mile north of the proposed project site. This roadway is designated by the City of Perris General Plan's Circulation Element as a four-lane Secondary Arterial, with an ultimate 94-foot right-of-way.

The ease with which intersections within the study area handle traffic predominantly controls the operation of the roadway system as a whole. Therefore, the Traffic Study's analysis of traffic at study area intersections was used to evaluate the traffic impacts of the proposed project. Based upon the Traffic Study, seventeen intersections within the study area were evaluated to determine their existing and future levels of service, with and without traffic from the proposed project; those seventeen intersections are:

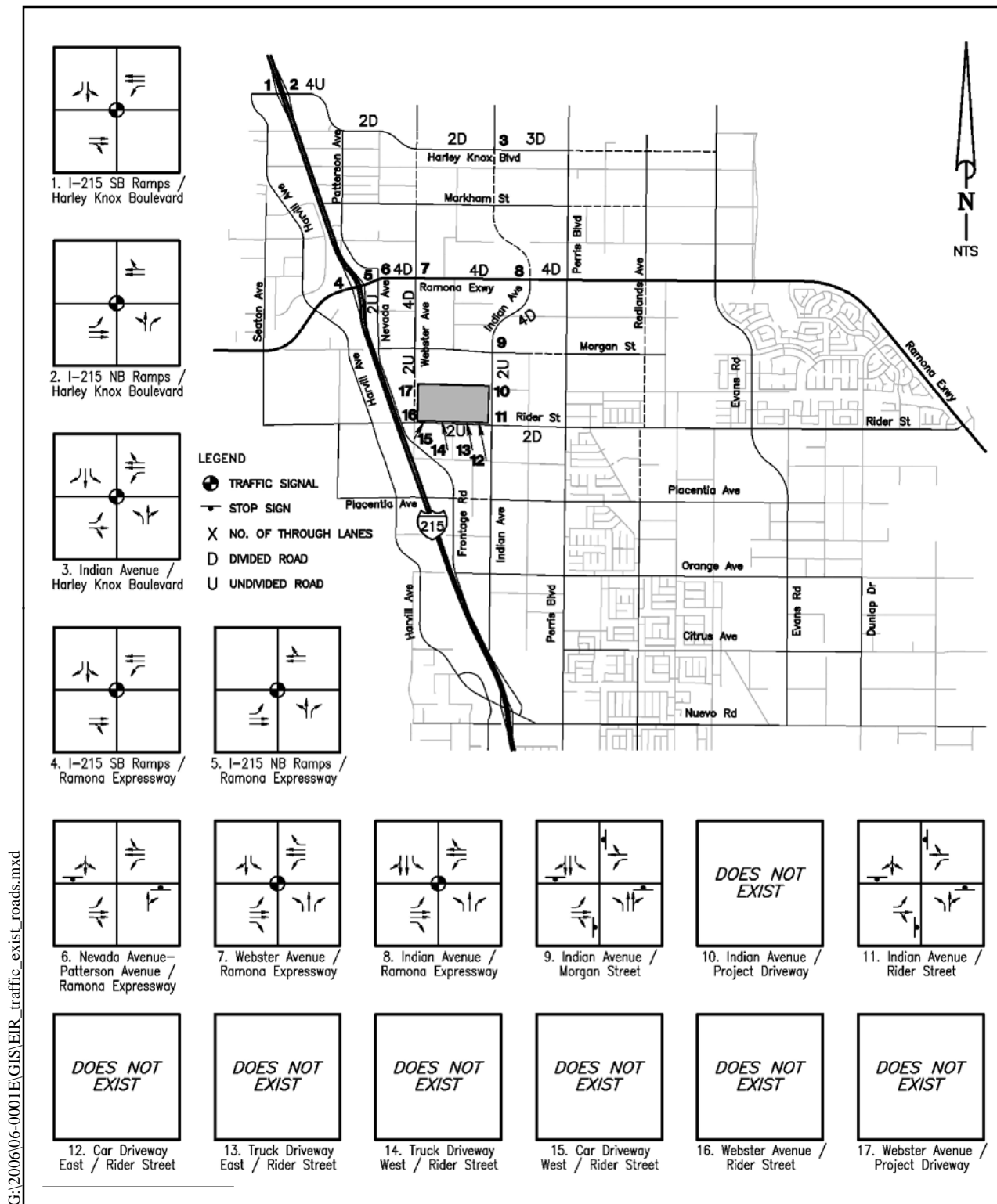
1. I-215 Southbound Ramps / Harley Knox Boulevard
2. I-215 Northbound Ramps / Harley Knox Boulevard
3. Indian Avenue / Harley Knox Boulevard
4. I-215 Southbound Ramps / Ramona Expressway
5. I-215 Northbound Ramps / Ramona Expressway
6. Nevada Avenue-Patterson Avenue / Ramona Expressway
7. Webster Avenue / Ramona Expressway
8. Indian Avenue / Ramona Expressway
9. Indian Avenue / Morgan Street
10. Indian Avenue / Project Driveway
11. Indian Avenue / Rider Street
12. Car Driveway East / Rider Street
13. Truck Driveway East / Rider Street
14. Truck Driveway West / Rider Street
15. Car Driveway West / Rider Street
16. Webster Avenue / Rider Street
17. Webster Avenue / Project Driveway

The surrounding area was formerly agricultural but is transitioning into predominantly industrial uses. Adjacent to the project site are agriculture fields to the east and northeast, a commercial site and vacant land to the west, and existing industrial development to the north and south. Average Daily Traffic (ADT) represents the number of vehicles on the roadway, per day, and is a standard way to estimate the volume of vehicles on a particular roadway.

City of Perris

Rados Distribution Center - Perris Draft EIR

Section 4.12- Traffic



Source: Albert A Webb Associates, Sept. 9, 2009,
Addendum to Traffic Impact Study Report, Rados
Distribution Center - (P07-0119), City of Perris, CA,
dated Nov. 7, 2008.

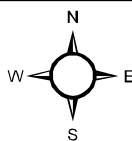


Figure 4.12-1
Existing Roadway System

The calculations for existing levels of service are based upon actual AM and PM peak hour traffic counts that were compiled as part of the Traffic Study. Seven of the seventeen analyzed intersections did not exist at the time the Traffic Study was prepared (intersections 10, and 12 through 17, as listed above). All of the analyzed intersections currently operate at a LOS that is acceptable to the City of Perris, except for the intersection of Nevada Avenue-Patterson Avenue / Ramona Expressway (intersection 6, as indicated above), which operates at LOS F in both the AM and PM peak hours. See **Table 4.12-B, Levels of Service – Existing Conditions (Year 2008)**. Under existing traffic conditions, no additional traffic signals appear to be warranted at the study area intersections.

Table 4.12-B
Levels of Service – Existing Conditions (Year 2008)

Intersection	Traffic Control Status ¹	AM Peak Hour		PM Peak Hour	
		Delay (Sec)	LOS	Delay (Sec)	LOS
1. I-215 SB Ramps / Harley Knox Boulevard	Signal	27.1	C	24.3	C
2. I-215 NB Ramps / Harley Knox Boulevard	Signal	26.5	C	22.1	C
3. Indian Avenue / Harley Knox Boulevard	Signal	27.9	C	27.5	C
4. I-215 SB Ramps / Ramona Expressway	Signal	36.4	D	58.6	E
5. I-215 NB Ramps / Ramona Expressway	Signal	21.7	C	18.1	B
6. Nevada Ave-Patterson Ave / Ramona Expressway	TWSC	174.8	F	OFL	F
7. Webster Avenue / Ramona Expressway	Signal	35.2	D	22.7	C
8. Indian Avenue / Ramona Expressway	Signal	13.6	B	19.7	B
9. Indian Avenue / Morgan Street	AWSC	13.0	B	9.2	A
10. Indian Avenue / Project Driveway	Does Not Exist				
11. Indian Avenue / Rider Street	AWSC	13.6	B	10.3	B
12. Car Driveway East / Rider Street	Does Not Exist				
13. Truck Driveway East / Rider Street	Does Not Exist				
14. Truck Driveway West / Rider Street	Does Not Exist				
15. Car Driveway West / Rider Street	Does Not Exist				
16. Webster Avenue / Rider Street	Does Not Exist				
17. Webster Avenue / Project Driveway	Does Not Exist				

¹ TWSC = Two Way Stop Controlled, AWSC = All Way Stop Controlled

Table 4.12-C, Cumulative (Off-Site) Projects Within Study Area indicates the approved and pending projects within the traffic study area. These projects were included per direction from City of Perris staff.

Table 4.12-C
Cumulative (Off-Site) Projects Within Study Area

Project	Land Use	Qty	Unit¹	AM Peak Hour	PM Peak Hour	Daily
1. TR 30850	Single-Family Detached	496	DU	372	501	4,747
2. TR 30973	Single-Family Detached	33	DU	24	33	316
3. TR 31157	Single-Family Detached	578	DU	434	584	5,531
4. TR 31225	Single-Family Detached	57	DU	43	57	545
5. TR 31226	Single-Family Detached	79	DU	59	80	756
6. TR 31240	Single-Family Detached	168	DU	126	170	1,608
7. TR 31367	Single-Family Detached	8	DU	6	8	77
8. TR 31371	Single-Family Detached	18	DU	13	19	172
9. TR 31650	Single-Family Detached	61	DU	46	62	584
10. TR 31659	Single-Family Detached	161	DU	121	163	1,541
11. TR 31678	Single-Family Detached	8	DU	6	8	77
12. TR 31683	Single-Family Detached	15	DU	11	16	144
13. TR 31809	Single-Family Detached	22	DU	16	22	211
14. TR 31925	Single-Family Detached	25	DU	19	25	239
15. TR 32041	Single-Family Detached	311	DU	233	314	2,976
16. TR 32249	Single-Family Detached	274	DU	205	276	2,622
17. TR 32262	Single-Family Detached	334	DU	250	338	3,196
18. TR 32406	Single-Family Detached	15	DU	11	16	144
19. TR 32428	Single-Family Detached	75	DU	56	76	718
20. TR 32497	Single-Family Detached	137	DU	103	139	1,311
21. TR 32707	Single-Family Detached	137	DU	103	139	1,311
22. TR 32708	Single-Family Detached	234	DU	175	237	2,239
23. TR 33066	Single-Family Detached	49	DU	36	49	469
24. TR 33193	Single-Family Detached	24	DU	18	24	230
25. TR 33199	Single-Family Detached	26	DU	20	27	249
26. TR 33200	Single-Family Detached	130	DU	98	131	1,244
27. TR 33338	Single-Family Detached	75	DU	56	76	718
28. TR 33608	Single-Family Detached	81	DU	60	82	775
29. TR 33670	Single-Family Detached	54	DU	40	55	517
30. TR 33720	Single-Family Detached	57	DU	43	57	545
31. TR 34048	Single-Family Detached	8	DU	6	8	77
32. TR 34078	Single-Family Detached	72	DU	54	73	689
33. TR 34260	Single-Family Detached	15	DU	11	16	144
34. TR 34429	Single-Family Detached	53	DU	40	54	507
35. TR 34582	Single-Family Detached	59	DU	44	60	565
36. TR 34716	Single-Family Detached	335	DU	252	338	3,206
37. TR 34887	Residential Condominium/Townhouse	92	DU	40	48	539
38. P05-0026	General Light Industrial	7.8	TSF	10	11	70
39. P05-0058	Shopping Center	113.8	TSF	127	511	5,540

Project	Land Use	Qty	Unit¹	AM Peak Hour	PM Peak Hour	Daily
40. P05-0113	High-Cube Warehouse	1,743.7	TSF	235	226	3,344
41. P05-0192	High-Cube Warehouse	697.6	TSF	92	88	1,338
42. P05-0271	General Light Industrial	38.1	TSF	54	49	342
43. P05-0284	General Office Building	38.9	TSF	89	123	645
	Residential Condominium/Townhouse	6	DU	2	3	35
44. P05-0302	General Office Building	0.9	TSF	5	80	35
45. P05-0343	Shopping Center	9.3	TSF	28	98	1,087
46. P05-0432	Warehousing	6	TSF	2	3	37
47. P05-0433	Mini-Warehouse	78.2	TSF	12	20	196
48. P06-0308	Industrial Park	365.8	TSF	490	621	4,748
49. P05-0452	Warehousing	31.2	TSF	17	21	199
50. P05-0477	High-Cube Warehouse	463.8	TSF	63	60	890
51. P05-0493	High-Cube Warehouse	1,931.2	TSF	256	249	3,703
52. P06-0014	Church	6	TSF	4	4	55
53. P06-0019 ²	Shopping Center	23	TSF	49	178	1,960
54. P06-0056	Fast Food Restaurant w/Drive Thru	3.4	TSF	135	89	1,265
55. P06-0059	Automobile Parts Sales	5.3	TSF	10	27	279
56. P06-0099	New Car Sales	34.6	TSF	71	92	1,154
57. P06-0135	Warehousing	15	TSF	9	9	95
58. P07-07-0032	Shopping Center	24.7	TSF	50	186	2,053
59. P06-0228	General Light Industrial	160	TSF	226	206	1,433
60. P06-0240	Mini-Warehouse	65.5	TSF	10	18	164
61. P06-0244	Senior Adult Housing - Detached	412	DU	95	136	1,805
62. P06-0299	Warehousing	11.1	TSF	4	7	71
63. PM30630	General Light Industrial	159	TSF	221	205	1,423
64. PM31868	General Light Industrial	159	TSF	221	205	1,423
65. P06-0351	General Light Industrial	99.2	TSF	140	126	886
66. CUP03425	General Light Industrial	67	TSF	93	87	600
67. CUP03468	Gasoline/Service Station with Convenience Market and Car Wash	16	VFP	114	144	1,650
	Shopping Center	12.3	TSF	29	105	1,174
68. CUP03477	General Light Industrial	31.2	TSF	44	38	279
69. CUP03370	Shopping Center	32	TSF	59	221	2,428
70. PP19301	Mini-Warehouse	88.2	TSF	13	22	221
71. PP19316	General Office Building	24	TSF	60	106	444
72. PP19728	General Light Industrial	9.6	TSF	16	12	88
73. PP20699	Warehousing	1,419	TSF	841	809	7,310
74. PP21027	General Light Industrial	500	TSF	703	641	4,475
75. PP21069	General Light Industrial	79.3	TSF	112	102	710
76. PP21144	General Light Industrial	118.5	TSF	169	155	1,061
77. PP16823	Manufacturing	22	TSF	25	21	108
78. PP21552	Warehousing	947	TSF	339	366	6,232
79. TR30592	Single-Family Detached	131	DU	101	136	1,334
80. P05-0024	High-Cube Warehouse	169.8	TSF	27	21	326
81. P05-0159	Single-Family Detached	54	DU	40	55	517
82. P06-0319	Single-Family Detached	115	DU	86	117	1,101
83. P06-0358	Shopping Center	15.1	TSF	38	134	1,490

Project	Land Use	Qty	Unit ¹	AM Peak Hour	PM Peak Hour	Daily
84. P06-0365	High-Cube Warehouse	354.5	TSF	47	48	678
85. P06-0417	High-Cube Warehouse	2,004.4	TSF	290	340	4,440
86. P06-0450	General Light Industrial	71.3	TSF	101	93	641
87. P06-0482	Single-Family Detached	178	DU	134	180	1,703
88. P06-0498	High-Cube Warehouse	642.1	TSF	90	84	1,234
89. P06-0511	Recreational Community Center	12	TSF	20	20	275
P06-0511	Warehousing	4	TSF	11	7	467
90. P07-0083	General Light Industrial	32.6	TSF	46	39	292
91. P07-0160	General Office Building	27.4	TSF	67	110	492
92. P07-06-0030	High-Cube Warehouse	386.9	TSF	47	51	742
93. P07-07-0029	High-Cube Warehouse	3,008	TSF	401	386	5,771
94. P07-07-0033	Shopping Center	18.5	TSF	42	154	1,701
95. P07-08-0006	Manufacturing	47	TSF	16	32	207
96. P07-09-0018	Warehousing	173	TSF	192	159	1,294
97. P07-09-0034	Residential Condominium/Townhouse	36	DU	16	19	211
98. P07-10-0015	Hotel	121	Rooms	81	85	1,079
99. P07-10-0016	Shopping Center	12.7	TSF	34	120	1,332
100. P07-11-0010	Shopping Center	16.5	TSF	40	142	1,579
101. P08-05-0021	Manufacturing	49.6	TSF	20	33	221
102. P03-0388	High-Cube Warehouse	201.6	TSF	20	33	221
	Warehousing	292.6	TSF	225	204	1,829
103. P05-0067	Warehousing	10.5	TSF	20	11	499
104. P05-0217	General Light Industrial	22.1	TSF	29	27	198
105. P05-0379	Business Park	72.4	TSF	105	112	1,525
106. P06-0140	Industrial Park	82.6	TSF	158	198	2,146
107. P06-0396	Warehousing	159.8	TSF	185	144	1,230
108. P07-0091	Shopping Center	78.0	TSF	101	398	4,333
109. P07-08-0012	Mini-Warehouse	8.0	TSF	1	2	20
110. Harvest Landing Phases 1 and 2	Mixed Use			1,976	2,417	24,496
TOTAL				13,399	16,953	170,376

¹ DU = Dwelling Units, TSF = Thousand Square Feet, VFP = Vehicle Fueling Positions

Related Regulations

The City of Perris “Street Fee” was enacted by City Resolution No. 2224, and authorizes the City to impose street improvement fees for the purposes of defraying all or a portion of the cost of public facilities related to a development project. The fees owed by the project will be based on the current fee rate at the time of construction.

The City of Perris General Plan establishes Circulation Policies for proposed projects. The City of Perris has established a citywide target of a minimum LOS D on all City-maintained roads with some exceptions (see “Thresholds of Significance” above for details and exceptions). Project development will meet and comply with all applicable City Circulation Policies by incorporating the below-listed mitigation measures. These policy standards address: Road

Rights-of-Way and Dedication; Roadway Design; Alignment; Access; Intersections; On-Site Road Improvements; Off-Site Road Improvements; Arterial Highways; Collector Streets; Commercial and Industrial Development; Circulation Hazards; Flooding; Dust and Blowsand; Congestion Relief/Level of Service; Parking; Pedestrian Facilities and Bikeways.

To ensure that area-wide traffic conditions do not worsen as development occurs throughout the County of Riverside, the County has established "fair share" mitigation fees which apply to projects within the City. This Transportation Uniform Mitigation Fee (TUMF) as well as a Road and Bridge Benefit District (RBBD) fee that the proposed project will be required to pay will offset the project contribution to area-wide traffic impacts. The fees owed by the project proponent will be based on the current fees at the time of construction.

Design Considerations

The proposed project will have one full access driveway on Indian Avenue, two full access and two limited access (right turns only) driveways on Rider Street, and one full access driveway on Webster Avenue. The two limited access driveways on Rider Street are restricted to car use only; the two full access driveways on Rider Street are restricted to heavy-truck use only. The project will include improving Indian Avenue, Rider Street, and Webster Avenue along the project frontage. The following is a general list of the improvements:

1. Indian Avenue shall be improved to its full street right-of-way to the center lane, plus 15 feet where it fronts the project site.
2. Indian Avenue shall be constructed as a 42-foot pilot road from the northern edge of the project site to Harley Knox Boulevard.
3. Webster Avenue shall be improved to its full street right-of-way to the center lane, plus 15 feet, where it fronts the project site.
4. Rider Street shall be improved to its full street right-of-way to the center lane, plus 15 feet where it fronts the project site, eastward to Perris Boulevard.
5. Install a stop sign at all project driveway exits.

Street Improvements will be made to these roadways pursuant to City of Perris Design Guidelines. The internal driveways and parking areas are designed to meet or exceed City of Perris standards for construction and design safety, including adequate turning radii for emergency vehicles.

Thresholds of Significance

The City of Perris has not adopted its own thresholds of significance and, instead, defers to the thresholds of significance identified in Appendix G of the CEQA Guidelines. Based on Appendix G of the CEQA Guidelines, impacts to transportation/traffic may be considered potentially significant if the project would:

- cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system, or exceed, either individually or cumulatively, a level of service standard established by the City/county congestion management agency for designated roads or highways.

This will be considered significant if, either individually or cumulatively, the project exceeds a Level of Service D on any City-maintained roads (including intersections) and along I-215 and SR-74 (including intersections with local streets and roads), except that LOS E is acceptable at intersections of any Arterials and Expressways with SR-74, the Ramona-Cajalco Expressway, or at I-215 Freeway ramps.

- conflict with adopted policies, plans or programs supporting alternative transportation.

Environmental Impacts Before Mitigation

Threshold: *Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system, or exceed, either individually or cumulatively, a level of service standard established by the City/county congestion management agency for designated roads or highways.*

- This will be considered significant if, either individually or cumulatively, the project exceeds a Level of Service D on any City-maintained roads (including intersections) and along I-215 and SR-74 (including intersections with local streets and roads), except that LOS E is acceptable at intersections of any Arterials and Expressways with SR-74, the Ramona-Cajalco Expressway, or at I-215 Freeway ramps.

Traffic projections for the proposed project take into consideration several factors. Trip generation represents the amount of traffic traveling to and from the proposed project. Trip distribution considers the directional orientation of traffic associated with the project. Modal split takes into account the traffic-reducing potential of public transit or other forms of transportation. Understanding trip generation and trip distribution are important in order to analyze a project's contribution to traffic load and capacity.

Project Trip Generation

Trip generation represents the amount of traffic traveling to and from the proposed project. Trip generation rates are based upon a publication entitled *San Bernardino/Riverside County Warehouse Distribution Center Vehicle Trip Generation Study* by the National Association of Industrial and Office Properties (NAIOP), January 2005. **Table 4.12-D, Trip Generation Rates** shows the peak hour trip generation rates used for the proposed project.

**Table 4.12-D
Trip Generation Rates¹**

Land Use	Unit of Measurement ²	AM Peak Hour			PM Peak Hour			Daily
		Total	In	Out	Total	In	Out	
High-Cube Warehouse Land Use Category: NAIOP 2005	TSF	0.080	0.046	0.034	0.080	0.028	0.052	1.100

¹ Trip generation rates from the *San Bernardino/Riverside County Warehouse/Distribution Center Vehicle Trip Generation Study* by the National Association of Industrial and Office Properties (NAIOP), January 2005.

² TSF – Thousand square feet

Table 4.12-E, Trip Generation Rate Breakdown by Classification provides the peak hour trip generation rate breakdown by classification for the proposed project. The trip generation rate breakdown by classification for high-cube warehouse is based upon the passenger car/truck split from the *San Bernardino/Riverside County Warehouse/Distribution Center Vehicle Trip Generation Study*.

**Table 4.12-E
Trip Generation Rate Breakdown by Classification**

Vehicle Classification	AM Peak Hour			PM Peak Hour			Daily
	Total	In	Out	Total	In	Out	
Passenger Cars	0.037	0.021	0.016	0.046	0.016	0.030	0.566
Trucks (2 Axle)	0.007	0.004	0.003	0.006	0.002	0.004	0.091
Trucks (3 Axle)	0.010	0.006	0.004	0.008	0.003	0.005	0.121
Trucks (4+ Axle)	0.026	0.015	0.011	0.020	0.007	0.013	0.322
Total	0.080	0.046	0.034	0.080	0.028	0.052	1.100

Table 4.12-F, Project Trip Generation provides the daily and peak hour trip generation for the proposed project. As shown in **Table 4.12-F**, this project is estimated to generate approximately 1,310 daily trip-ends including 96 trip-ends during the AM peak hour and 95 trip-ends during the PM peak hour.

Table 4.12-F, Project Trip Generation

Land Use	Quantity	Unit ²	AM Peak Hour Total			PM Peak Hour			Daily
			Total	In	Out	Total	In	Out	
High-Cube Warehouse	1,191.1	TSF	96	55	41	95	33	62	1,310

¹ Trip generation rates from the *San Bernardino/Riverside County Warehouse/Distribution Center Vehicle Trip Generation Study* by the National Association of Industrial and Office Properties (NAIOP), January 2005.

² TSF=Thousand Square Feet

Table 4.12-G, Project Trip Generation Breakdown by Classification provides the breakdown of the trip generation for the proposed project into passenger car and truck classifications. **Table 4.12-H, Project Trip Generation Breakdown by Classification in PCE** provides the breakdown of passenger car and truck classifications into passenger car equivalents (PCE). The trip generation uses a PCE factor of 1.5 for 2 axle, 2.0 for 3 axle and 3.0 for 4+ axle trucks. As shown, the project is anticipated to generate approximately 2,276 PCE daily trip-ends, including 175 PCE trip-ends during the AM peak hour and 155 PCE trip-ends during the PM peak hour.

**Table 4.12-G
Project Trip Generation Breakdown by Classification¹**

Vehicle Classification	AM Peak Hour			PM Peak Hour			Daily
	Total	In	Out	Total	In	Out	
Passenger Cars	44	25	19	55	19	36	674
Trucks (2 Axle)	9	5	4	7	2	5	108
Trucks (3 Axle)	12	7	5	10	4	6	144
Trucks (4+ Axle)	31	18	13	23	8	15	384
Total	96	55	41	95	33	62	1,310

**Table 4.12-H
Project Trip Generation Breakdown by Classification in PCE¹**

Vehicle Classification	AM Peak Hour			PM Peak Hour			Daily
	Total	In	Out	Total	In	Out	
Passenger Cars (PCE = 1.0)	44	25	19	55	19	36	674
Trucks (2 Axle, PCE = 1.5)	14	8	6	11	3	8	162
Trucks (3 Axle, PCE = 2.0)	24	14	10	20	8	12	288
Trucks (4+ Axle, PCE = 3.0)	93	54	39	69	24	45	1,152
Total (in PCE)	175	101	74	155	54	101	2,276

¹ PCE = Passenger Car Equivalency

Project Trip Distribution

Trip distribution represents the directional orientation of traffic to and from the project site. Trip distribution is influenced by the geographical location of the site, type of land use in the study area (such as shopping centers and recreational sites), and proximity to the regional freeway system. The directional orientation of traffic for the proposed project was determined based upon the existing roadway system, existing traffic patterns, and proximity of local urban centers.

Modal Split

The traffic-reducing potential of public transit was not considered in the Traffic Study. Therefore, the traffic projections provided in that study are considered conservative since public transit could reduce traffic volumes in the project area.

Levels of Service – Existing Plus Ambient Growth Plus Project Conditions (Year 2011)

The projected levels of service at the analyzed intersections under existing conditions, plus three years ambient growth, with project-specific traffic included are shown in **Table 4.12-I, Levels of Service – Existing Plus Ambient Growth Plus Project (Year 2011)**. A rate of 3% per year was utilized for ambient growth³ for the purposes of the Traffic Study. The levels of service shown on **Table 4.12-I** were based upon the existing geometrics at the intersections.

Table 4.12-I
Levels of Service – Existing Plus Ambient Growth Plus Project (Year 2011)

Intersection	Traffic Control Status ¹	AM Peak Hour		PM Peak Hour	
		Delay (Sec) ³	LOS	Delay (Sec) ³	LOS
1. I-215 SB Ramps / Harley Knox Boulevard	Signal	27.3	C	25.0	C
2. I-215 NB Ramps / Harley Knox Boulevard	Signal	25.9	C	21.0	C
3. Indian Avenue / Harley Knox Boulevard	Signal	28.0	C	29.3	C
4. I-215 SB Ramps / Ramona Expressway	Signal	43.7	D	81.4	F
5. I-215 NB Ramps / Ramona Expressway	Signal	25.6	C	19.4	B
6. Nevada Ave-Patterson Ave / Ramona Expressway	TWSC	OFL	F	OFL	F
7. Webster Avenue / Ramona Expressway	Signal	41.9	D	24.0	C
8. Indian Avenue / Ramona Expressway	Signal	19.2	B	21.4	C
9. Indian Avenue / Morgan Street	AWSC	16.1	C	10.2	B
10. Indian Avenue / Project Driveway	OWSC	10.8	B	13.2	B
11. Indian Avenue / Rider Street	AWSC	17.0	C	10.7	B
12. Car Driveway East / Rider Street	RIRO	9.3	A	8.8	A
13. Truck Driveway East / Rider Street	OWSC	10.9	B	11.0	B
14. Truck Driveway West / Rider Street	OWSC	10.6	B	10.7	B
15. Car Driveway West / Rider Street	OWSC	9.0	A	8.7	A
16. Webster Avenue / Rider Street	OWSC ²	10.1	B	10.4	B
17. Webster Avenue / Project Driveway	OWSC	8.6	A	8.6	A

¹ TWSC = Two Way Stop Controlled; AWSC = All Way Stop Controlled; OWSC = One Way Stop Controlled; RIRO = Right In Right Out

² Two-way left turn lane

³ OFL = Overflow conditions whereas delay > 200 seconds

Table 4.12-B shows the existing levels of service at the analyzed intersections. The intersection of Nevada Avenue/Patterson Avenue and Ramona Expressway currently operates at LOS F, during both the AM and PM peak hours. During the PM peak hour, the intersection of the I-215 Southbound Ramps and Ramona Expressway currently operates at the maximum allowable LOS for that intersection, LOS E. Under existing plus ambient growth plus project-specific traffic conditions two intersections fail:

- I-215 Southbound Ramps and Ramona Expressway
- Nevada Avenue/Patterson Avenue and Ramona Expressway

³ Ambient growth accounts for unknown area growth in traffic volumes due to the development of projects outside the study area and also general growth in traffic due to changes in neighboring communities which cannot be accurately modeled.

Under the conditions presented in **Table 4.12-I**, one additional intersection fails when compared to the existing conditions; I-215 Southbound Ramps and Ramona Expressway. The intersection of Nevada Avenue/Patterson Avenue and Ramona Expressway still fails under existing plus ambient growth plus project-specific traffic conditions.

Levels of Service – Existing Plus Ambient Growth Plus Cumulative Development Plus Project (Year 2011)

The projected levels of service at the study intersections under existing plus ambient growth conditions, including cumulative development (projects on other sites within the subject project's vicinity) and project-specific traffic are shown in **Table 4.12-J, Levels of Service – Existing Plus Ambient Growth Plus Cumulative Development Plus Project (Year 2011)**. **Table 4.12-C** lists all of the approved cumulative projects that were accounted for in the Traffic Study. The cumulative projects, listed in **Table 4.12-C**, were provided by the City of Perris Engineering Department for inclusion in the traffic impact analysis. The levels of service shown on **Table 4.12-J** were based upon existing intersection geometrics.

Table 4.12-J
Levels of Service – Existing Plus Ambient Growth Plus Cumulative
Development Plus Project (Year 2011)

Intersection	Traffic Control Status ¹	AM Peak Hour		PM Peak Hour	
		Delay (Sec) ³	LOS	Delay (Sec) ³	LOS
1. I-215 SB Ramps / Harley Knox Boulevard	Signal	OFL	F	OFL	F
2. I-215 NB Ramps / Harley Knox Boulevard	Signal	OFL	F	OFL	F
3. Indian Avenue / Harley Knox Boulevard	Signal	OFL	F	197.9	F
4. I-215 SB Ramps / Ramona Expressway	Signal	OFL	F	OFL	F
5. I-215 NB Ramps / Ramona Expressway	Signal	146.4	F	177.3	F
6. Nevada Ave-Patterson Ave / Ramona Expressway	TWSC	OFL	F	OFL	F
7. Webster Avenue / Ramona Expressway	Signal	104.3	F	113.7	F
8. Indian Avenue / Ramona Expressway	Signal	56.8	E	75.6	E
9. Indian Avenue / Morgan Street	AWSC	92.0	F	36.8	E
10. Indian Avenue / Project Driveway	TWSC	23.4	C	49.9	E
11. Indian Avenue / Rider Street	AWSC	111.9	F	68.5	F
12. Car Driveway East / Rider Street	RIRO	9.3	A	9.2	A
13. Truck Driveway East / Rider Street	OWSC	11.4	B	11.8	B
14. Truck Driveway West / Rider Street	OWSC	11.1	B	11.5	B
15. Car Driveway West / Rider Street	OWSC	9.1	A	9.0	A
16. Webster Avenue / Rider Street	OWSC ²	10.6	B	10.7	B
17. Webster Avenue / Project Driveway	OWSC	8.9	A	9.0	A

¹ TWSC = Two Way Stop Controlled; AWSC = All Way Stop Controlled; OWSC = One Way Stop Controlled; RIRO = Right In Right Out

² Two-way left turn

³ OFL = Overflow conditions whereas delay > 200 seconds

Project Impacts

The proposed project is expected to generate 1,310 daily trip-ends, including 96 trip-ends during the AM Peak hour and 95 trip-ends during the PM Peak hour. Future roadway intersection performance is determined by evaluating existing traffic conditions (**Table 4.12-B**) and comparing those results to future scenario analysis results.

Under existing conditions (**Table 4.12-B**), the following intersection already exceeds an acceptable level of service:

- Nevada Avenue/Patterson Avenue and Ramona Expressway

Under existing plus ambient growth plus project conditions (**Table 4.12-I**), the following two intersections exceed an acceptable level of service:

- I-215 Southbound Ramps and Ramona Expressway
- Nevada Avenue/Patterson Avenue and Ramona Expressway

Under existing plus ambient growth plus cumulative development plus project conditions (**Table 4.12-J**), the following ten intersections exceed an acceptable level of service:

- I-215 Southbound Ramps and Harley Knox Boulevard
- I-215 Northbound Ramps and Harley Knox Boulevard
- Indian Avenue and Harley Knox Boulevard
- I-215 Southbound Ramps and Ramona Expressway
- I-215 Northbound Ramps and Ramona Expressway
- Nevada Avenue/Patterson Avenue and Ramona Expressway
- Webster Avenue and Ramona Expressway
- Indian Avenue and Morgan Street
- Indian Avenue and Project Driveway
- Indian Avenue and Rider Street

The preceding analysis shows that the project will contribute to the exceedance of City LOS thresholds both directly and cumulatively when analyzed with other area projects anticipated in the near future. Mitigation measures **MM Trans 1 through MM Trans 16**, in the form of construction of signals and roadway improvements, or payment of fees, as listed below will be required to reduce the potential impacts to less than significant levels.

Therefore, the proposed project will not cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system, and will not exceed, either individually or cumulatively, a Level of Service D on any City-maintained roads [including intersections] and along I-215 and SR-74 [including intersections with local streets and roads], or a LOS E at intersections of any Arterials and Expressways with SR-74, the Ramona-Cajalco Expressway, or at I-215 Freeway ramps); and therefore potential traffic-related impacts are considered **less than significant with mitigation**.

Threshold: *The project would conflict with adopted policies, plans or programs supporting alternative transportation.*

The proposed project is an industrial warehouse project which will consist of a building used to store and house goods during their local and regional distribution. The Riverside Transit Authority (RTA) operates Routes 19 (Moreno Valley Mall to Perris) and 41 (Mead Valley Community Center to RCRMC) within vicinity of the project site. Route 19 travels north and south along Perris Boulevard with “alternate routing” along Ramona Expressway, Webster Avenue, Morgan Street and Indian Avenue. Route 41 travels east and west along Cajalco/Ramona Expressway with routing along Webster Avenue, Morgan Street and Indian Avenue. Employees of the proposed project will be able to utilize these RTA routes as a means of alternate modes of transportation to and from work.

The City of Perris General Plan identifies alternate modes of transportation as being bus, rail or pedestrian. Specifically, Policy I.B.1 states: “require on-site improvements that accommodate public transit vehicles (i.e., bus pullouts, transit stops, cueing lanes, bus turnarounds and other improvements) at major trip attractions (i.e., community centers, tourist and employment centers).” The project will include roadway improvements which include sidewalks and bike racks, and is located near to existing bus routes. The project will not conflict with the City’s adopted policies, plans or programs supporting alternative modes of transportation, and therefore potential impacts are considered **less than significant**.

Proposed Mitigation Measures

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (CEQA Guidelines, Section 15126.4). Mitigation measures were drafted based on the Traffic Study (Appendix J) for their ability to eliminate the potential significant adverse impacts upon traffic or to reduce impacts to below the level of significance.

Based upon the traffic study, the following improvements will substantially lessen traffic impacts attributable to the project and other area-wide growth.

MM Trans 1: Indian Avenue shall be improved to its full street right-of-way to the center lane, plus 15 feet where it fronts the project site.

MM Trans 2: Indian Avenue shall be constructed as a 42-foot pilot road from the northern edge of the project site to Harley Knox Boulevard.

MM Trans 3: Webster Avenue shall be improved to its full street right-of-way to the center lane, plus 15 feet where it fronts the project site.

MM Trans 4: Rider Street shall be improved to its full street right-of-way to the center lane, plus 15 feet where it fronts the project site, eastward to Perris Boulevard.

MM Trans 5: Sight distance at the project entrance roadway shall be reviewed with respect to standard City of Perris sight distance standards at the time of preparation of final grading, landscape and street improvement plans.

MM Trans 6: The proposed project shall participate in the phased construction of off-site traffic signals through payment of the project's fair share of traffic signal mitigation fees.

MM Trans 7: Signing/stripping shall be implemented in conjunction with detailed construction plans for the project site.

Mitigation Measures MM Trans 8 through MM Trans 15 will be constructed by the developer of the proposed project prior to the issuance of occupancy permits, except where said improvements have previously been constructed.

MM Trans 8: Construct the intersection of Indian Avenue and Project Driveway to include the following geometrics:

Northbound: One left turn lane. One shared through and right turn lane.

Southbound: One left turn lane. One shared through and right turn lane.

Eastbound: One shared left turn, through, and right turn lane. Stop controlled.

Westbound: One shared left turn, through, and right turn lane. Stop controlled.

MM Trans 9: Modify the intersection of Indian Avenue and Rider Street to include the following geometrics:

Northbound: One left turn lane. One shared through and right turn lane. Stop controlled.

Southbound: One left turn lane. One shared through and right turn lane. Stop controlled.

Eastbound: One left turn lane. One shared through and right turn lane. Stop controlled.

Westbound: One left turn lane. One shared through and right turn lane. Stop controlled.

MM Trans 10: Construct the intersection of Car Driveway East and Rider Street to restrict movement to right-in and right-out only from the driveway with the following geometrics:

Northbound: Not Applicable.

Southbound: One right turn lane. Stop controlled.

Eastbound: One through lane.

Westbound: One shared through and right turn lane.

MM Trans 11: Construct the intersection of Truck Driveway East and Rider Street to include the following geometrics:

Northbound: Not Applicable.

Southbound: One shared left turn and right turn lane. Stop controlled.

Eastbound: One left turn lane. One through lane.

Westbound: One shared through and right turn lane.

MM Trans 12: Construct the intersection of Truck Driveway West and Rider Street to include the following geometrics:

Northbound: Not Applicable.

Southbound: One shared left turn and right turn lane. Stop controlled.

Eastbound: One left turn lane. One through lane.

Westbound: One shared through and right turn lane.

MM Trans 13: Construct the intersection of Car Driveway West and Rider Street to include the following geometrics:

Northbound: Not Applicable.

Southbound: One shared left turn and right turn lane. Stop controlled.

Eastbound: One shared left turn and through lane.

Westbound: One shared through and right turn lane.

MM Trans 14: Construct the intersection of Webster Avenue and Rider Street to include the following geometrics:

Northbound: Not Applicable.

Southbound: One left turn lane. One right turn lane. Stop controlled.

Eastbound: One left turn lane. One through lane.

Westbound: One shared through and right turn lane.

MM Trans 15: Construct the intersection of Webster Avenue and Project Driveway to include the following geometrics:

Northbound: One shared through and right turn lane.

Southbound: One shared left turn and through lane.

Eastbound: Not Applicable.

Westbound: One shared left turn and right turn lane. Stop controlled.

MM Trans 16: The project shall participate in the cost of off-site improvements through payment of the fair share mitigation fees. These fees shall be collected and utilized as needed by the City of Perris to construct the improvements necessary to maintain the required level of service and build roads to the general plan build-out level.

Summary of Environmental Effects After Mitigation Measures Are Implemented

As shown in **Table 4.12-I**, two intersections are anticipated to exceed acceptable levels of service in the existing plus ambient growth plus project conditions scenario, without mitigation: I-215 Southbound Ramps and Ramona Expressway, and Nevada Avenue/Patterson Avenue and Ramona Expressway. However, with the incorporation of mitigation measures **MM Trans 1 through MM Trans 16** above, all of the study intersections are projected to operate at LOS D or better, thus meeting the City’s thresholds. **Table 4.12-K, Levels of Service – Existing plus Ambient Growth plus Project with Mitigation** provides the projected levels of service at the study area intersections with mitigation measures **MM Trans 1 through MM Trans 16** incorporated.

Table 4.12-K
Levels of Service - Existing plus Ambient Growth
plus Project with Mitigation

Intersection	Traffic Control Status ¹	AM Peak Hour		PM Peak Hour	
		Delay (Sec)	LOS	Delay (Sec)	LOS
1. I-215 SB Ramps / Harley Knox Boulevard	Signal	27.3	C	25.0	C
2. I-215 NB Ramps / Harley Knox Boulevard	Signal	25.9	C	21.0	C
3. Indian Avenue / Harley Knox Boulevard	Signal	28.0	C	29.3	C
4. I-215 SB Ramps / Ramona Expressway	Signal	32.3	C	46.1	D
5. I-215 NB Ramps / Ramona Expressway	Signal	25.6	C	19.4	B
6. Nevada Ave-Patterson Ave / Ramona Expressway	Signal	9.4	A	10.1	B
7. Webster Avenue / Ramona Expressway	Signal	41.9	D	24.0	C
8. Indian Avenue / Ramona Expressway	Signal	19.2	B	21.4	C
9. Indian Avenue / Morgan Street	AWSC	16.1	C	10.2	B
10. Indian Avenue / Project Driveway	OWSC	10.8	B	13.2	B
11. Indian Avenue / Rider Street	AWSC	17.0	C	10.7	B
12. Car Driveway East / Rider Street	RIRO	9.3	A	8.8	A
13. Truck Driveway East / Rider Street	OWSC	10.9	B	11.0	B
14. Truck Driveway West / Rider Street	OWSC	10.6	B	10.7	B
15. Car Driveway West / Rider Street	OWSC	9.0	A	8.7	A
16. Webster Avenue / Rider Street	OWSC ²	10.1	B	10.4	B
17. Webster Avenue / Project Driveway	OWSC	8.6	A	8.6	A

¹ AWSC = All Way Stop Controlled; OWSC = One Way Stop Controlled; RIRO = Right In Right Out

² Two-way left turn

4.13 WATER AND SEWER

Potential impacts related to water and sewer services were found to be potentially significant in the NOP prepared for this project (Appendix A). The focus of the following discussion is related to the potential impacts from the proposed project upon water and sewer services.

In addition to other reference documents, the following references were used in the preparation of this section of the DEIR:

- City of Perris, *City of Perris General Plan 2030*. July 12, 2005. (Available at the City of Perris and at www.cityofperris.org/city-hall/general-plan.html, accessed on January 28, 2009.)
- City of Perris, *City of Perris General Plan 2030 Draft EIR*, October 2004. (Available at the City of Perris and at www.cityofperris.org/city-hall/general-plan.html, accessed on January 28, 2009.)
- Eastern Municipal Water District, *Water Supply Assessment for the City of Perris Project (Development Plan Review Number 07-0119)*, June 4, 2008. (Appendix K)
- Eastern Municipal Water District, *2005 Urban Water Management Plan*, 2005 (Available at www.emwd.org/news/pubs_uwmp.html)

Setting

Water

The City of Perris is served by Eastern Municipal Water District (EMWD), which provides freshwater (potable water), wastewater service and recycled water to an area of 555 square miles. This includes six incorporated cities (including Perris) in addition to unincorporated areas in the County of Riverside. EMWD serves over 100,000 customers. EMWD has an existing 14-inch diameter waterline adjacent to the project site in Rider Street.

EMWD was formed in 1950 by popular vote; Eastern Municipal Water District serves as a public water agency. In 1951 it was annexed into the Metropolitan Water District (MWD) and is one of MWD's 26 member agencies. Initially, EMWD was to deliver imported water to supplement local groundwater to serve primarily agriculture. Over time, it has expanded to include ground water production, desalination, water filtration, wastewater collection and treatment, and regional water recycling to domestic users.

EMWD has three sources of water supply: imported water from MWD, which comes from the Colorado River Aqueduct and from Northern California through the State Water Project, local groundwater production, and recycled water. EMWD relies on MWD for 80% of its potable water supply. Potable water is supplied to EMWD either as treated or untreated water. Treated water is supplied from two treatment facilities: Mills MWD Water Treatment Facility and Lake Skinner Water Treatment Facility. Untreated water from MWD through the State Water Project is treated at a micro-filtration plant located in the City of Perris. The water treated at the Mills

Treatment Facility is water from the State Water Project. Water treated at Lake Skinner Treatment Facility is from both the Colorado River Aqueduct and State Water Project. A small amount of raw water from MWD is also used for agricultural purposes. MWD has developed and implemented an Integrated Resource Plan. The plan was updated and adopted in July 2004. It analyzes current data to determine demand and supply alternatives to determine reliability through 2025. The plan sets targets for conservation, local supplies, State Water Project supplies, Colorado River Aqueduct supplies, groundwater banking, and water transfers. By using a diverse mix of resources, MWD and its agencies reduce its dependency on a single water supply resource.

Groundwater is also a major supply of water (20%) in the Hemet/San Jacinto area of EMWD. It is the only source of locally-produced potable water. There are eight groundwater management zones in the San Jacinto Watershed within EMWD's service area. These eight groundwater management zones are: Canyon, San Jacinto Upper Pressure, San Jacinto Lower Pressure, Lakeview/Hemet North, Hemet South, Perris South, Perris North, and Menifee. Each area has a management plan which develops and implements comprehensive water resource management programs to protect, optimize, and enhance the use of all available resources. EMWD has developed several programs designed to take advantage of this local resource so there is less dependency on MWD imported water. Programs include the Hemet/San Jacinto Recharge and Recovery Program which is currently being processed through CEQA.

Recycled water is produced and treated at four regional water reclamation facilities. As the service area population grows, the demand for recycled water increases while reducing the demand for recycled water by agricultural customers. The supply of recycled water is not dependent on weather patterns and may increase in dry years. Storage facilities may become a challenge during wet years.

Sewer

EMWD's wastewater collection system includes over 1,534 miles of gravity sewer lines, 53 sewage lift stations, and 5 regional water reclamation facilities, which have a combined total capacity of 61 million gallons per day (MGD), with the potential to expand to 224 MGD. The closest sewerline to the project site is an 8-inch diameter sewerline in Indian Avenue.

Sewer flows generated by the project will ultimately be treated and disposed of at EMWD's existing Perris Valley Regional Water Reclamation Facility (PVRWRF). The plant currently receives sewage from a 120-square-mile area in Perris, Sun City, Romoland, Homeland, and a portion of Moreno Valley. The facility is sited on approximately 300 acres, west of Interstate 215, south of Case Road, in the City of Perris. Wastewater at this facility is treated to tertiary level and the water is sold to irrigate approximately 900 acres.

Recycled Water

EMWD operates and maintains four regional water reclamation facilities. These facilities treat water collected in EMWD's wastewater system for use as recycled water. EMWD currently has 91 recycled water customers and sells up to 26,000 AFY of recycled water. The majority of the recycled water sold is used for agricultural irrigation. In recent years, sales to municipal customers have rapidly increased as residential and urban development replaces irrigated farmland (**Table 4.13-A, EMWD Wastewater Treatment Facilities**).

Table 4.13-A
EMWD Wastewater Treatment Facilities

Treatment Plant	Level of Treatment	Capacity (mgd)	Typical Daily Flow (mgd)	Ultimate Expansion (mgd)
San Jacinto Valley RWRf	Secondary	11	7.8	27
Moreno Valley RWRf	Tertiary	13	11.2	16
Perris Valley RWRf	Tertiary	11	3.9*	100
Sun City RWRf	Tertiary	3	2.4	15-27
Temecula Valley RWRf	Tertiary	12	6.0	54
TOTAL	-	50 mgd	31.3 mgd	224 mgd

* Perris Valley RWRf actually receives a total of 7.7 mgd. All flows from Sun City (2.4 mgd) are diverted to Perris Valley. Partial flows of 0.4 mgd from Moreno Valley and 1.0 mgd from Hemet are also diverted to the Perris Plant.

Related Regulations

Water

The proposed project is required to comply with Senate Bill 610. In October of 2001, Senate Bill (SB) 610 and SB 221 were signed into California state law with an effective date of January 1, 2002. SB 610 amended existing legal requirements for confirmation of water supply sufficiency as a condition of approval for development projects. The confirmation of water supply sufficiency is achieved through an analysis of the water purveyor's existing and future water sources and existing and projected water demand in relation to a "project" as defined by SB 610, resulting in the production of a project-specific Water Supply Assessment (WSA). The WSA also requires additional analysis if any portion of the water purveyor's water supplies include groundwater.

The requirements of SB 610 are triggered for projects going through the California Environmental Quality Act (CEQA) process. During the CEQA process, the City or County processing the project is required to request a WSA from the identified water purveyor for any "project," as defined by SB 610. SB 610 allows the water purveyor 90 days from the date that it is requested, to prepare the project-specific WSA.

SB 610 defines a "project" as:

- a residential subdivision of 500 dwelling units or more;
- a shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet (sq. ft.) of floor space;
- a commercial office building employing more than 1,000 persons or having more than 250,000 sq. ft. of floor space;
- a hotel or motel having more than 500 rooms;
- an industrial, manufacturing, or processing plant or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 sq. ft. of floor space; or
- a mixed use project including one or more of the aforementioned projects or any other project demanding an amount of water equivalent to or greater than the amount of water required by a 500 dwelling unit project.

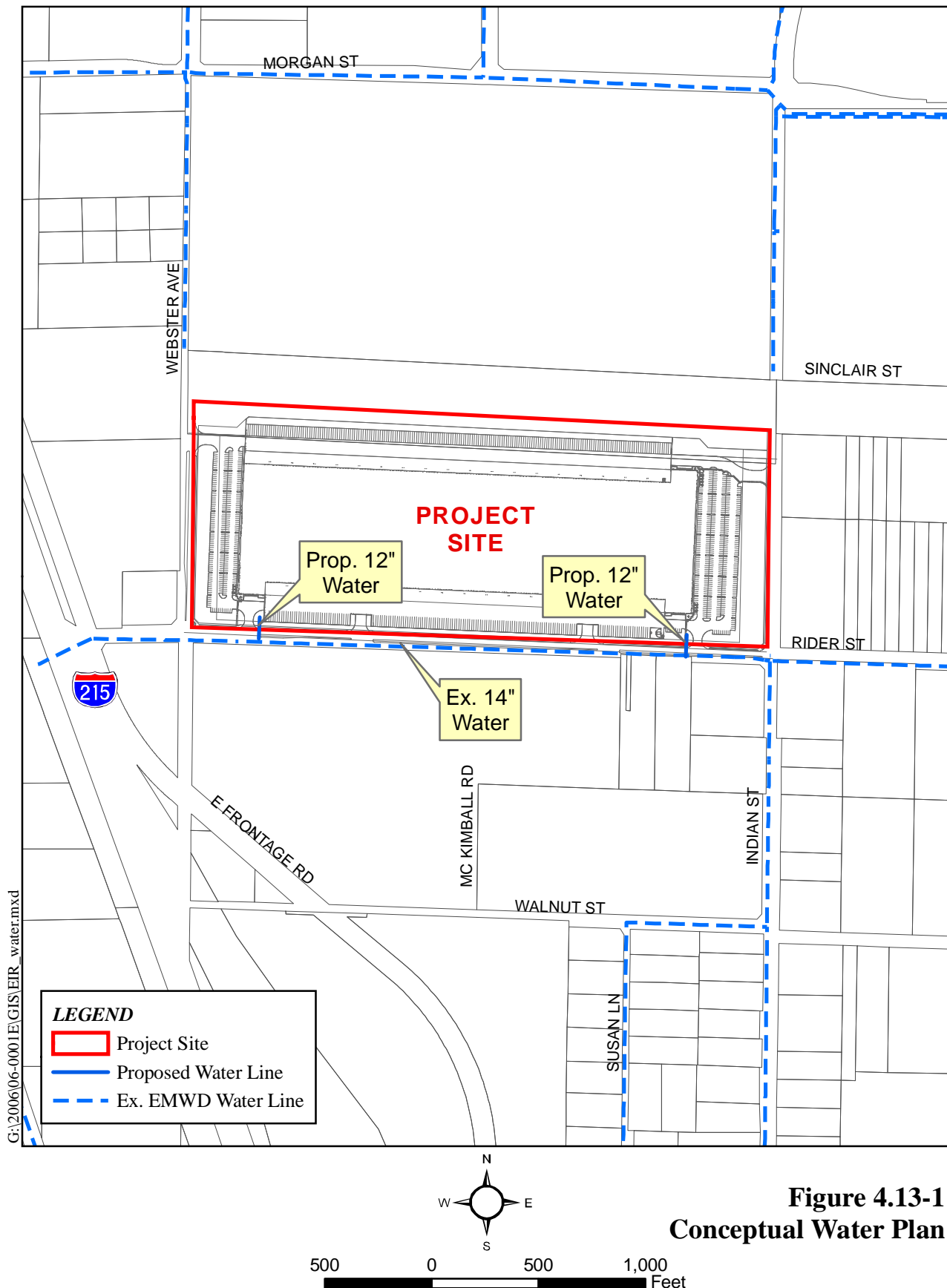
The project involves the development of an approximately 1,191,080-square-foot distribution center and therefore, meets the fifth "project" definition criteria described above. Consequently, the proposed project is required to have a WSA prepared by EMWD and a water supply verification issued by EMWD is also required. A request to EMWD was made on behalf of the proposed project at the time the Notice of Preparation was circulated; and a WSA was prepared and adopted by EMWD's Board of Directors. A copy of the WSA is located in Appendix K of this DEIR.

Sewer

There are no specific regulations related to the proposed sewer facilities that are applicable to the potential project.

Design Considerations

No specific design considerations have been incorporated as part of the project which will address potential impacts to water or sewer services and facilities. The project is proposed to connect to the existing 14-inch diameter waterline in Rider Street (**Figure 4.13-1, Conceptual Water Plan**). The project is also proposed to connect to the existing 8-inch diameter sewerline in Indian Avenue (**Figure 4.13-2, Conceptual Sewer Plan**).





Thresholds of Significance

The City of Perris has not adopted its own thresholds of significance and, instead, defers to the thresholds of significance identified in Appendix G of the CEQA Guidelines. Based on Appendix G of the CEQA Guidelines, impacts to water and sewer service may be considered potentially significant if the project would:

Water

- require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects; and/or
- have insufficient water supplies available to serve the project from existing entitlements and resources, or require new or expanded entitlements.

Sewer

- require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, the construction of which would cause significant environmental effects; and/or
- result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

Environmental Impacts Before Mitigation

***Threshold:** Require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects.*

EMWD provides water treatment services to the project site and the surrounding area. The project will connect to an existing 14-inch diameter water line located on Rider Street. **Figure 4.13-1, Conceptual Water Plan**, shows the location of the proposed and existing water lines.

Some additional water lines will be constructed within and adjacent to the boundaries of the proposed project in order to extend water service from the existing water line on Rider Street to new service points within the project.

Table 4.13-B shows the average projected water supply and demand from 2010 to 2030 from the EMWD Water Supply Assessment.

Table 4.13-B
Projected Water Supply and Demand Comparison (AF/YR)

	2010	2015	2020	2025	2030
Total Supply	173,720	199,796	222,582	240,886	257,091
Total Demand	164,422	184,610	208,323	232,331	255,649
Surplus Supply	9,298	15,186	14,259	8,555	1,442

Specifically, the project site is served by MWD raw supply water that is treated at the Perris Micro-Filtration Plant (Perris Plant) located in the City of Perris, south of Ramona Expressway. The Perris Plant has a current capacity of 15 cubic feet per second (cfs) (9.69 million gallons per day (mgd)). For comparison, 1 acre foot equals approximately 0.326 million gallons. Therefore, the Perris micro-filtration Plant can currently process approximately 10,849 AF/YR as calculated below.

$$(\text{Perris Plant Capacity } 9.69 \text{ mgd} \div 0.326 \text{ mg}) \times 365 \text{ days} = 10,849 \text{ AF/YR}$$

In 2005, the Perris Plant supplied (had demand for) approximately 8,000 AF/YR. Thus the plant has approximately 2,849 AF/YR additional capacity.

The Perris Plant is currently completing an expansion to add an additional 15.5 cubic feet per second (cfs) (10.0 mgd) to bring total capacity of the facility to 20 mgd. This additional capacity is consistent with the 5-year Capital Improvement Program adopted by EMWD. The current master plan for the facility indicates that the Perris Plant will be increased to 97 mgd by 2009. Per **Table 4.13-C**, the project's demand for potable water will be approximately 65 AF/YR or approximately 58,100 gallons per day (gpd). Therefore, based on available excess capacity at the Perris Plant which exceeds the proposed project's demand, expansion capacity at the Perris Plant, and the inclusion of the proposed project in EMWD demand modeling for future years, the project will not result in a need for the construction of new water treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects. Impacts related to water treatment facilities are **considered less than significant**.

Threshold: *Have insufficient water supplies available to serve the project from existing entitlements and resources, or require new or expanded entitlements.*

According to the EMWD Water Supply Assessment (Appendix _ of this document), which is incorporated herein by reference, projected EMWD's domestic water demand is expected to increase from 164,422 acre-feet per year in 2010 to 255,649 acre-feet per year in 2030 in normal water years. The proposed project is expected to have a demand of 138.16 acre-feet per year, which is only 0.08% of EMWD's anticipated water demand for 2030. EMWD will have sufficient supplies in normal, dry and multiple dry years to satisfy projected demands within its service area, including the proposed project.

Table 4.13-C
Perris Distribution Center Demand for EMWD

Land Use	GPD/Acres	Projected Acres ¹	Project Water Demand (AFY) ²	EMWD's Projected Water Supply (2030)		
				<i>Normal</i>	<i>Single-Dry Year</i>	<i>Multi-Dry Year</i>
Light Industrial	700 gpd/ac	83	65 AFY	257,091 AFY	259,725 AFY	259,725 AFY
TOTAL			65 AFY			

Source: Eastern Municipal Water District, Water Supply Assessment (Appendix _ of this document).

¹ Although the project size is approximately 61.63 acres, the water supply assessment evaluated the proposed project as an 83-acre project.

² Demand converted from gallon per day (gpd) to acre-feet per year (AFY) – #gallons/day converted to #acre/day x 365 days= #AFY

EMWD is able to provide excess supply even in multiple dry years because it relies on MWD, which has stated in their Regional Urban Water Management Plan that it assures reliability of imported water supply to its member agencies through a multiple-year drought or single dry year through 2030.

As noted above, the primary source of EMWD's water supply is imported from MWD. MWD has two sources of water: the Colorado River and the State Water Project. Currently, there are no identified water quality risks that cannot be mitigated. MWD entitlements to water from these two sources exceed actual deliveries; however, MWD has developed a computer-based model named IRPSIM to evaluate the reliability of the supply. The IRPSIM is based on 70 years of historical hydrology (from 1922 to 1991) to allow it to estimate water surplus and shortage over a 20-year period. That model allowed MWD to analyze the reliability of deliveries to its member agencies during worst-case single year and multiple year drought events. The results of MWD's modeling indicate that it can maintain reliable supplies under such drought conditions throughout the 2005 to 2030 time period. Detailed justifications for MWD's supply projections are contained in Appendix A of MWD's 2005 Regional UWMP, which is included as Appendix B of the EMWD Water Supply Assessment. As detailed in that justification, MWD can expect supplies not just from the Colorado River and the State Water Project, but also conservation programs, groundwater storage programs, and water transfer/exchange programs. The latter programs, for example, would allow MWD to supplement deliveries from the State Water Project with 300,000 acre-feet of water.

The total anticipated water demand in 2030 by the project (roughly 65 acre-feet per year) is below the 257,100 acre-feet that the EMWD Water Supply Assessment anticipates will be available supply that year. MWD projects 100% reliability in supplies in all water year types, so demand and supply projections in single dry and multiple dry years vary only slightly. Additionally, EMWD's supply from groundwater and recycled water are not expected to vary greatly based on climatic variability. Therefore, based on the water supply assessment prepared for the project by EMWD and the above-mentioned EMWD Water Supply Assessment, the water supply impact associated with EMWD water service would not cause them to have insufficient water supplies available. Impacts are **less than significant**.

Threshold: *Require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, the construction of which would cause significant environmental effects.*

The project will be served by EMWD. The existing sewer line is located on Indian Ave, approximately 300 feet south of the project. EMWD has incorporated the extension of this 27-inch in diameter sewer line in their Master Water and Sewer Plan. The line will extend onto both Rider Street and continue north on Indian Avenue. **Figure 4.13-2, Conceptual Sewer Plan**, shows the proposed sewer network. These facilities would be placed within road rights-of-way, and would have minimal environmental impacts. Sewage collected from these lines will be conveyed to EMWD's Perris Valley Regional Water Reclamation Facility (PVRWRF), located west of the I-215 freeway and south of Highway 74.

Since the sewer extension is covered in EMWD's Master Water and Sewer Plan, the project will not result in new wastewater treatment facilities. Also, the sewer facilities will be constructed entirely within road rights-of-way, therefore impacts due to construction are considered to be **less than significant**.

Threshold: *Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.*

Wastewater from the project will be treated at EMWD's PVRWRF located in the City of Perris. The plant receives sewage from a 120-square mile area covering Perris, Sun City, Romoland, Homeland and a portion of Moreno Valley. The facility is located on 300 acres. Recycled to high standards for beneficial reuse, the water is sold to farmers who irrigate about 900 acres. The PVRWRF has a current capacity of 11 MGD (million gallons per day). This facility has the potential to expand to 100 MGD. It is currently receiving 7.7 MGD.

EMWD uses a standard theoretical generation rate of 1,700 gallons per day per acre for commercial/industrial development. Using this theoretical rate, the proposed project's theoretical wastewater generation will be 48,450 gallons per day. These flows will need to be considered in projecting EMWD's future needs for purchased wastewater treatment capacity from the Perris Valley Regional Wastewater Reclamation Facility that will treat wastewater from the project site. Currently, this facility has a capacity of 11 million gallons per day (MGD), and is receiving approximately 7.7 MGD; thus it currently has sufficient capacity to accommodate the proposed project. This amount of wastewater is not considered a significant demand on EMWD's existing commitments to treat wastewater. Impacts are therefore, considered **less than significant**.

Proposed Mitigation Measures

An EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (CEQA Guidelines, Section 15126.4). Mitigation measures are evaluated for their ability to eliminate or reduce the potential significant adverse impacts related to water and sewer service. The proposed project will not result in any significant adverse impacts to water supply, or sewer infrastructure, and, therefore, mitigation is not required.

Summary of Environmental Effects After Mitigation Measures Are Implemented

Less than significant impacts to sewer and water facilities are expected to occur because the project includes water and sewer improvements as part of its project design.

5.0 MANDATORY CEQA TOPICS

The CEQA Guidelines set forth several general content requirements for EIRs. Those applicable to this project include cumulative impacts (Section 15130), unavoidable adverse impacts (Section 15126(b)), growth inducing impacts (Section 15126(d)), and alternatives to the project (Section 15126.6). The following addresses each of these general requirements.

CUMULATIVE IMPACT ANALYSIS

Introduction

CEQA requires that an EIR examine the cumulative impacts associated with a project, in addition to project-specific impacts. The discussion of cumulative impacts must reflect the severity of the impacts and the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the project alone (CEQA Guidelines Section 15130(b)).

As stated in the CEQA Guidelines, an EIR “shall discuss cumulative impacts of a project when the project’s incremental effect is cumulatively considerable (Section 15130(a)). “Cumulatively considerable” means that “the incremental effects of an individual 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 as defined in Section 15130” (Section 15065(c)). Section 15355 of the CEQA Guidelines states that “cumulative impacts” occur from “...the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.”

A cumulative impact is not considered significant if the impact can be mitigated to below the level of significance through mitigation, including providing improvements and/or contributing funds through fee-payment programs. The EIR must examine “reasonable options for mitigating or avoiding any significant cumulative effects of a proposed project” (CEQA Guidelines Sections 15130(a)(3) and 15130(b)(5)).

CEQA Guidelines Section 15130(b)(1) requires that a discussion of cumulative impacts be based on either a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.

This EIR primarily utilizes the “summary of projections” approach in the cumulative analysis. Section 15130(d) of the CEQA Guidelines states that, “Previously approved land use documents such as general plans, specific plans, and local coastal plans may be used in cumulative impact analysis. A pertinent discussion of cumulative impacts contained in one or more previously certified EIRs may be incorporated by reference pursuant to the provisions for tiering and

program EIRs. No further cumulative impact analysis is required when a project is consistent with a general, specific, master or comparable programmatic plan where the lead agency determines that the regional or area-wide cumulative impacts of the proposed project have been adequately addressed, as defined in section 15152(f), in a certified EIR for that plan.” Additionally, if a cumulative impact was adequately addressed in a prior EIR for a community plan, zoning action, or general plan, and the project is consistent with that plan or action, then an EIR for such a project should not further analyze that cumulative impact. (Section 15130(e) of the CEQA Guidelines)

Cumulative Analysis Setting

The cumulative impact analysis for the proposed project is based on information contained in the City of Perris General Plan 2030 and Draft Environmental Impact Report City of Perris General Plan 2030 (SCH No. 2004031135) certified by the City Council in October 2004. These documents are utilized because the geographic area addressed in the two documents encompasses not only the proposed project site, but all portions of City surrounding the proposed project site that could be potentially impacted by the proposed project’s contribution to cumulative impacts. Both of these documents are hereby incorporated by reference. The two documents are available for review at the locations cited for these documents in Section 6.0. (References) of this DEIR. Additionally, the project is consistent with the land use designations and policies of the City of Perris General Plan.

Because of the nature of individual environmental factors, the cumulative area for every issue addressed in this Draft EIR will not be identical. The individual cumulative areas for the issues addressed in this Draft EIR are provided in the respective impact sections.

In those instances where the list method was utilized for cumulative impact analysis, a list of projects was provided by the City of Perris for which, at the time the Traffic Study and EIR process started, had either been developed with the approval of the City of Perris or were pending approval by the City of Perris. Additional projects in other jurisdictions also contribute to cumulative impacts such as traffic. The list of projects considered in this cumulative analysis is presented in **Table 5.0-A, Cumulative (Off-Site) Projects within Study Area**. This is the same list as utilized in the proposed project’s traffic study in the Transportation/Traffic (Section 4.12) that would most relate to the geographic extent as the proposed project.

As defined in Section 15355 of the CEQA Guidelines, a cumulative impact consists of an impact which is created as a result of the combination of the proposed project evaluated in the Draft EIR together with other projects causing related impacts. The projects listed in **Table 5.0-A**, represent proposed residential developments and plot plans for commercial, warehousing, and/or industrial projects which are specifically within the proposed project vicinity and are the “other projects” that will be evaluated along with the proposed project in the cumulative impact analysis.

Table 5.0-A, Cumulative (Off-Site) Projects within Study Area

Project	Land Use	Qty	Unit¹
1. TR 30850	Single-Family Detached	496	DU
2. TR 30973	Single-Family Detached	33	DU
3. TR 31157	Single-Family Detached	578	DU
4. TR 31225	Single-Family Detached	57	DU
5. TR 31226	Single-Family Detached	79	DU
6. TR 31240	Single-Family Detached	168	DU
7. TR 31367	Single-Family Detached	8	DU
8. TR 31371	Single-Family Detached	18	DU
9. TR 31650	Single-Family Detached	61	DU
10. TR 31659	Single-Family Detached	161	DU
11. TR 31678	Single-Family Detached	8	DU
12. TR 31683	Single-Family Detached	15	DU
13. TR 31809	Single-Family Detached	22	DU
14. TR 31925	Single-Family Detached	25	DU
15. TR 32041	Single-Family Detached	311	DU
16. TR 32249	Single-Family Detached	274	DU
17. TR 32262	Single-Family Detached	334	DU
18. TR 32406	Single-Family Detached	15	DU
19. TR 32428	Single-Family Detached	75	DU
20. TR 32497	Single-Family Detached	137	DU
21. TR 32707	Single-Family Detached	137	DU
22. TR 32708	Single-Family Detached	234	DU
23. TR 33066	Single-Family Detached	49	DU
24. TR 33193	Single-Family Detached	24	DU
25. TR 33199	Single-Family Detached	26	DU
26. TR 33200	Single-Family Detached	130	DU
27. TR 33338	Single-Family Detached	75	DU
28. TR 33608	Single-Family Detached	81	DU
29. TR 33670	Single-Family Detached	54	DU
30. TR 33720	Single-Family Detached	57	DU
31. TR 34048	Single-Family Detached	8	DU
32. TR 34078	Single-Family Detached	72	DU
33. TR 34260	Single-Family Detached	15	DU
34. TR 34429	Single-Family Detached	53	DU
35. TR 34582	Single-Family Detached	59	DU
36. TR 34716	Single-Family Detached	335	DU
37. TR 34887	Residential Condominium/Townhouse	92	DU
38. P05-0026	General Light Industrial	7.8	TSF
39. P05-0058	Shopping Center	113.8	TSF
40. P05-0113	High-Cube Warehouse	1,743.7	TSF
41. P05-0192	High-Cube Warehouse	697.6	TSF
42. P05-0271	General Light Industrial	38.1	TSF
43. P05-0284	General Office Building	38.9	TSF
	Residential Condominium/Townhouse	6	DU

Project	Land Use	Qty	Unit¹
44. P05-0302	General Office Building	0.9	TSF
45. P05-0343	Shopping Center	9.3	TSF
46. P05-0432	Warehousing	6	TSF
47. P05-0433	Mini-Warehouse	78.2	TSF
48. P06-0308	Industrial Park	365.8	TSF
49. P05-0452	Warehousing	31.2	TSF
50. P05-0477	High-Cube Warehouse	463.8	TSF
51. P05-0493	High-Cube Warehouse	1,931.2	TSF
52. P06-0014	Church	6	TSF
53. P06-0019 ²	Shopping Center	23	TSF
54. P06-0056	Fast Food Restaurant w/Drive Thru	3.4	TSF
55. P06-0059	Automobile Parts Sales	5.3	TSF
56. P06-0099	New Car Sales	34.6	TSF
57. P06-0135	Warehousing	15	TSF
58. P07-07-0032	Shopping Center	24.7	TSF
59. P06-0228	General Light Industrial	160	TSF
60. P06-0240	Mini-Warehouse	65.5	TSF
61. P06-0244	Senior Adult Housing - Detached	412	DU
62. P06-0299	Warehousing	11.1	TSF
63. PM30630	General Light Industrial	159	TSF
64. PM31868	General Light Industrial	159	TSF
65. P06-0351	General Light Industrial	99.2	TSF
66. CUP03425	General Light Industrial	67	TSF
67. CUP03468	Gasoline/Service Station with Convenience Market and Car Wash	16	VFP
	Shopping Center	12.3	TSF
68. CUP03477	General Light Industrial	31.2	TSF
69. CUP03370	Shopping Center	32	TSF
70. PP19301	Mini-Warehouse	88.2	TSF
71. PP19316	General Office Building	24	TSF
72. PP19728	General Light Industrial	9.6	TSF
73. PP20699	Warehousing	1,419	TSF
74. PP21027	General Light Industrial	500	TSF
75. PP21069	General Light Industrial	79.3	TSF
76. PP21144	General Light Industrial	118.5	TSF
77. PP16823	Manufacturing	22	TSF
78. PP21552	Warehousing	947	TSF
79. TR30592	Single-Family Detached	131	DU
80. P05-0024	High-Cube Warehouse	169.8	TSF
81. P05-0159	Single-Family Detached	54	DU
82. P06-0319	Single-Family Detached	115	DU
83. P06-0358	Shopping Center	15.1	TSF
84. P06-0365	High-Cube Warehouse	354.5	TSF
85. P06-0417	High-Cube Warehouse	2,004.4	TSF
86. P06-0450	General Light Industrial	71.3	TSF
87. P06-0482	Single-Family Detached	178	DU
88. P06-0498	High-Cube Warehouse	642.1	TSF

Project	Land Use	Qty	Unit¹
89. P06-0511	Recreational Community Center	12	TSF
P06-0511	Warehousing	4	TSF
90. P07-0083	General Light Industrial	32.6	TSF
91. P07-0160	General Office Building	27.4	TSF
92. P07-06-0030	High-Cube Warehouse	386.9	TSF
93. P07-07-0029	High-Cube Warehouse	3,008	TSF
94. P07-07-0033	Shopping Center	18.5	TSF
95. P07-08-0006	Manufacturing	47	TSF
96. P07-09-0018	Warehousing	173	TSF
97. P07-09-0034	Residential Condominium/Townhouse	36	DU
98. P07-10-0015	Hotel	121	Rooms
99. P07-10-0016	Shopping Center	12.7	TSF
100. P07-11-0010	Shopping Center	16.5	TSF
101. P08-05-0021	Manufacturing	49.6	TSF
102. P03-0388	High-Cube Warehouse	201.6	TSF
	Warehousing	292.6	TSF
103. P05-0067	Warehousing	10.5	TSF
104. P05-0217	General Light Industrial	22.1	TSF
105. P05-0379	Business Park	72.4	TSF
106. P06-0140	Industrial Park	82.6	TSF
107. P06-0396	Warehousing	159.8	TSF
108. P07-0091	Shopping Center	78	TSF
109. P07-08-0012	Mini-Warehouse	8	TSF
110. Harvest Landing Phases 1 and 2	Mixed Use	*	*

TSF = Thousand Square Feet, DU = Dwelling Units, VFP=Vehicle Fueling Positions

* Specific quantities not available since use is mixed; however, Table 4.12-C of the Transportation/Traffic section of this document specifies the project's AM/PM peak hour and daily traffic generation.

Assessment of Cumulative Impacts

Agricultural Resources

Conversion of agricultural lands to non-agricultural uses is a function of population growth, combined with the availability of developable land and the increasing costs of water. With increased urbanization in the City, other impacts affect agricultural productivity. Increased population results in increased urban water use that reduces supplies that would otherwise be available for agricultural use. Increased demand for water increases water costs which, in turn, result in marginal agriculture becoming impractical.

Approximately 52 percent of the land within the City of Perris is currently or has formerly been utilized for agricultural purposes. Many agricultural fields have been out of production for a number of years and are dominated by disturbed vegetation. Various forms of disturbance related to agricultural uses include frequent disking, pesticide application, and irrigation. Farmland within the City is most often used for sod farms, alfalfa, hay, and other dry land farming. High yield or cash crops are not a principal characteristic of Perris agricultural production or economy.

The City of Perris is undergoing transition into an urban area and conversion of agricultural lands has been identified as goals of both the current (2005) and past (1991) General Plans. Agricultural land use designations were not established in either plan. The General Plan land use designations for the project property are Light Industrial and Public/Semi-Public Facilities/Utilities. The project includes a Change of Zone from A1 (Light Agricultural) to LI (Light Industrial).

Development of the proposed project will convert approximately 58 acres of Prime Farmland and approximately 6 acres of Farmland of Local Importance into non-agricultural land uses. The project site is currently undeveloped land that is being leased to a farmer growing winter wheat. It is situated within Planning Area 3. The largest land use designation within Planning Area 3 is Light Industrial. Agricultural land, similar in character to the project site, borders the site on the east. This land is also likely to convert to non-agricultural uses with or without the proposed project as per the General Plan; the City does not envision the lands to continue as agricultural uses.

While the operation of industrial uses would increase development pressure on adjacent agricultural properties, given the pattern of development in the City, the City's vision for the project area as evidenced by the General Plan, and the approved and proposed development in the project area, the conversion of the adjacent agricultural properties is already likely. The development of the proposed project would not hasten or otherwise contribute to the conversion of agricultural land to non-agricultural uses.

Whether or not adjacent agricultural land is developed depends on the confluence of several factors including market demand, availability of property, profitability of the agricultural use, and the landowner's interest in continuing farming. The proposed industrial uses are located in close proximity to planned and approved commercial, business park, and industrial developments.

As stated previously, the City does not maintain a General Plan designation for agricultural uses. In addition, no local or regional program to mitigate for the cumulative impacts to agricultural resources is available. During the last reporting period (2002–2004), 4,824 acres of Prime Farmland were converted to other uses. The cumulative effect of development in the region will continue to result in the conversion of agricultural lands to non-agricultural uses. Because agricultural land, including Prime Farmland is a finite resource, and because neither the City of Perris nor the County of Riverside maintains a program to offset agricultural resource impacts, the conversion of the project site to industrial uses, in conjunction with planned and future development in the City and region, would contribute to a further reduction in the amount of land available for agricultural uses.

Individually, the proposed project will result in converting approximately 62 acres of undeveloped land to industrial uses. The implementation of this project will result in significant adverse environmental impacts from the conversion of Farmland to non-agricultural use. The proposed project does not involve any other changes in the existing environment which, due to location or nature, could result in conversion of local farmland to a non-agricultural use. Cumulatively, the loss of approximately 58 acres of Prime Farmland is considered a significant

change to the total amount of land under agriculture land use in the City of Perris. Therefore, the proposed development of approximately 62 acres designated as Light Industrial will result in a cumulatively considerable impact on agricultural resources.

Please see Section 4.1 (Agricultural Resources) for a discussion on project-level mitigation measures and explanations as to why none are feasible for this project.

The City of Perris does not have an established fee or other mechanism to offset the loss of farmland. The process of establishing such a fee structure or other process for this purpose would be time consuming and would be an economic burden of time to this one project. Therefore, project-related and cumulative impacts to agricultural resources resulting from the implementation of this project are still considered **significant**. Adoption of a Statement of Overriding Consideration would be required prior to project approval.

Airports

This cumulative impact analysis considers development of the proposed project, in conjunction with other development in the City and neighboring jurisdictions. Risks associated with airport hazard-related impacts to or from the March Air Reserve Base (MARB) are largely site specific and localized, and are thus limited to the project site. As such, the potential for cumulative impacts to occur is limited.

Although each development site has potentially unique airport hazard-related impacts to or from the MARB, it is expected that future growth will generally comply with the range of federal, state, and local statutes and regulations applicable to development near airports, and will be subject to existing and future programs of enforcement by the appropriate regulatory agencies. In addition, mitigation measures **MM Airport 1** through **MM Airport 4** will be implemented to reduce airport-related impacts. For these reasons, cumulative impacts resulting from airport-related safety hazards would be less than significant. Consequently, the proposed project's impact associated with airport hazard-related impacts to or from the MARB would be less than cumulatively considerable and thus not significant.

All potential direct impacts of the project and cumulative impacts are considered to be **less than significant** with the above mitigation measure incorporated.

Air Quality

The cumulative area for air quality impacts is the South Coast Air Basin. The proposed project site is located within a non-attainment region of the South Coast Air Basin (Basin), and specifically within Source Receptor Area (SRA) 24 of the Basin. This area is the geographical context for the cumulative impact analysis of this proposed project. The meteorological patterns of Southern California lend to the “blowing-in” effect of air pollution from the more populated and industrial counties to the west of the proposed project site area.

The portion of the Basin within which the proposed project is located is designated as a non-attainment area for ozone, PM-10, and PM-2.5 under both state and federal standards. Based on the technical studies prepared for this proposed project (Appendix C), the proposed project will

have significant air quality impacts on a regional level both during short-term construction and during long term operations. The project was found to not have localized impacts on sensitive receptors related to both short-term and long-term activities.

In evaluating the cumulative effects of the project, Section 21100(e) of CEQA states that “previously approved land use documents including, but not limited to, general plans, specific plans, and local coastal plans, may be used in cumulative impact analysis.” In addressing cumulative effects for air quality, the AQMP utilizes approved general plans and, therefore, is the most appropriate document to use to evaluate cumulative impacts of the subject project. This is because the AQMP evaluated air quality emissions for the entire South Coast Air Basin using a future development scenario based on population projections and set forth a comprehensive program that would lead the region, including the project area, into compliance with all federal and state air quality standards. Since the project’s emissions exceed the daily regional thresholds, the cumulative impact is significant and the project’s incremental contribution to those impacts is considered cumulatively considerable. Adoption of a Statement of Overriding Consideration would be required prior to project approval.

Locally, the project’s traffic would be added to surrounding roadways, along with other development projects listed above in **Table 5.0-A**, and would not create micro-scale CO hot spot impacts to sensitive receptors adjacent to traveled roadways.

Diesel Exhaust Impacts

The project’s Health Risk Assessment (Appendix C) is the source of the following analysis. Please see Section 4.3 and Appendix C for a more detailed discussion of cumulative impacts related to diesel emissions. Diesel emissions are the focus of the Health Risk Assessment as the South Coast Air Quality Management District (SCAQMD) has determined that it is of particular concern in the Basin, and especially in the Inland Empire area, and projects which contribute to diesel emissions should be evaluated for their health impacts to the surrounding area. The estimates provided in a Health Risk Assessment relate to project-specific data taken from the Traffic Study (Webb Associates 2008) and do not need to include ambient concentrations of diesel particulate matter (DPM). This is because ambient concentrations are locally monitored by the SCAQMD and reported in their series titled the *Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES)*. As described in Section 4.3, the most recent study is the Final MATES-III which was released in September 2008. As part of the MATES-III results, the project vicinity’s modeled cancer risk from diesel particulates is approximately 532 excess cases of cancer per one million people.

The proposed project will be developed in an area that is zoned and planned for industrial land uses by the City of Perris. Therefore, it is important to also examine the other known pending or approved projects which have a diesel truck component (i.e., commercial or industrial) and this project’s contribution to cumulative impacts in the project vicinity. The cumulative projects used in this cumulative analysis that would also be a source of diesel emissions are light industrial and warehouse-type uses listed on **Table 5.0-A**, above.

As stated in Section 4.3, other planned projects in the area will generate diesel exhaust; and the combination of existing conditions, other planned projects, and this project will result in

sensitive receptors within the project vicinity potentially being exposed to a maximum cancer risk of 3.8 excess cancer cases in one million. This is less than the SCAQMD threshold of 10 excess cancer cases in one million. The cancer risk faced by off-site workers in the project vicinity from DPM emissions from existing traffic, project-generated traffic, and traffic generated by cumulative projects ranges from 0.7 in one million to 2.0 in one million, which does not exceed the SCAQMD threshold of significance. It should be noted that the SCAQMD threshold relates to the project's incremental contribution to cancer risk and is not intended to be compared with the effects of multiple projects, both existing and planned. Therefore, excess cancer risks to both industrial/commercial and sensitive receptors are considered **less than significant** and mitigation measures are not required.

In addition, the maximum non-cancer risks associated with the proposed project were also below the SCAQMD threshold as discussed in Section 4.3 and Appendix C.

Greenhouse Gases (GHG)

Regarding global climate change and GHG emissions as discussed previously in Section 3.3, project design and mitigation will help reduce the intensity of project-related emissions. However, the proposed project would generate daily operational emissions of NO_x that exceeds the thresholds of significance recommended by the SCAQMD for criteria pollutants. Therefore, the City of Perris is taking the conservative approach and determining that the contribution of the project's GHG emissions to the state-wide cumulative impact would be considerable.

Biological Resources

The geographical context for the analysis of cumulative biological impacts includes western Riverside County and accounts for all anticipated cumulative growth within this geographic area as represented by full implementation of the City of Perris related projects list in this Draft EIR and includes a planning horizon through the next twenty or so years, which also coincides with the planning horizon for the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP).

The primary effects of the proposed project, when considered with other projects in the Region (as defined above), would be the cumulative direct loss of open space, vegetation associations important to raptors, habitat of sensitive or special-status wildlife species, and regional movement corridors that support migratory avian species. Specifically, present and probable future projects in the vicinity of the proposed project are anticipated to permanently remove plant and wildlife resources, which could affect special-status species, nesting habitat for resident and migratory avian species, wetlands, sensitive natural plant communities, wildlife movement, and/or local policies or ordinances protecting biological resources.

With respect to special-status species, including sensitive natural plant communities and raptor foraging habitat, although habitat offered within agricultural and cultivated areas is of significantly lesser quality than that which is found in natural areas, it still provides open spaces for foraging, refuge, and areas of limited disturbance that can be utilized for reproduction. However, anticipated cumulative impacts have been addressed within the region by the MSHCP. The MSHCP addresses 146 "Covered Species" that represent a broad range of habitats and

geographical areas within western Riverside County, including threatened and endangered species, and regionally or locally sensitive species that have very specific habitat requirements and conservation and management needs. The MSHCP addresses biological impacts for take of Covered Species within the Plan Area. Impacts to Covered Species and establishment and implementation of a regional conservation strategy and other measures included in the MSHCP are intended to address the federal, state, and local mitigation requirements for these species and their habitats. Specifically, Section 4.4 of the MSHCP states that:

The MSHCP was specifically designed to cover a large geographical area so that it would protect numerous endangered species and habitats throughout the region. It is the projected cumulative effect of future development that has required the preparation and implementation of the MSHCP to protect multiple habitats and multiple endangered species.

It goes on to state that:

The Local Development Mitigation Fee is to be charged throughout the Plan Area to all future development within the western part of the county and the cities in order to provide a coordinated conservation area and implementation program that will facilitate the preservation of biological diversity, as well as, maintain the region's quality of life.

The reason for the imposition of the Fee over the entire region is that the loss of habitat for endangered species is a regional problem resulting from the cumulative impacts of continuing development throughout all of the jurisdictions. In addition, the purchase of habitat properties for preservation purposes with regionally-generated fees not only mitigates the endangered species habitat issue, but also helps resolve other regional problems related to the retention of open space and historic view sheds which, in turn, promote flood protection and water re-charge measures.

Last, Section 5.1 of the MSHCP states that:

“It is anticipated that new development in the Plan Area will fund not only the mitigation of the impacts associated with its proportionate share of regional development, but also the impacts associated with the future development of more than 332,000 residential units and commercial and industrial development projected to be built in the Plan Area over the next 25 years.”

As public and private development, including construction of buildings, structures, infrastructure, and all alterations of the land that are implemented within areas that are outside of the Criteria Area are permitted under the Plan (see MSHCP Section 2.3.7.1), cumulative impacts would be less than significant provided that the terms of the MSHCP are fully implemented. As discussed in Section 4.4 (Biological Resources), the proposed project has performed the recommended and required habitat assessments and focused surveys for the proposed project site and would be required to pay the required MSHCP mitigation fee(s). The proposed project will comply with the requirements of the MSHCP and, thus, will not conflict with its adopted policies. Cumulative impacts to special-status species, including sensitive natural communities

and raptor foraging habitat, are fully addressed within the Plan and are considered less than significant. Accordingly, the proposed project's contribution to cumulative impacts would also be less than significant.

With respect to nesting birds, the Migratory Bird Treaty Act (MBTA) fully protects migratory avian species during the breeding season by the establishment of a federal prohibition, unless permitted by regulations, to “pursue, hunt, take, capture, kill, attempt to take, capture or kill, possess, offer for sale, sell, offer to purchase, purchase, deliver for shipment, ship, cause to be shipped, deliver for transportation, transport, cause to be transported, carry, or cause to be carried by any means whatever, receive for shipment, transportation or carriage, or export, at any time, or in any manner, any migratory bird, included in the terms of this Convention...for the protection of migratory birds...or any part, nest, or egg of any such bird.” (16 U.S.C. 703) Therefore, assuming compliance with the law established by the MBTA, cumulative impacts to nesting migratory birds would be considered less than significant. Compliance with the MBTA, as well as the project-specific requirements established by mitigation measures **MM Bio 1** and **MM Bio 2** that require surveys for nesting species as well as a restriction on construction activities if nests are found during the breeding season, would ensure that the proposed project's contribution to the cumulative impact is also **less than significant**.

Cultural Resources

The cumulative area for cultural resources is the City of Perris. As development occurs throughout the City and the region, historical structures may be demolished or modified to allow for such development. Although such projects would require CEQA analysis and mitigation of the potential impacts to historic resources by the City of Perris, some buildings may be demolished or otherwise adversely modified, and overall a cumulative impact may occur. However, as described above, the proposed project will not result in an adverse change in the significance of a historical resource; and the proposed project would not result in a contribution to this cumulative impact on historic resources. The impact of the proposed project on historic resources is considered less than cumulatively considerable and thus is **not significant**.

Development of the Perris area requires grading and excavation that could potentially affect archeological or paleontological resources or unknown buried human remains. If these resources are not protected upon their discovery, the cumulative affect of these projects upon subsurface cultural resources will be significant. Although the proposed project could result in damage to or the destruction of subsurface resources, the mitigation measures and project requirements contained within this DEIR will ensure that any resources encountered during project construction will be properly identified and appropriately treated. The proposed project, therefore, will not result in cumulatively considerable contribution to the impacts of archeological or paleontological resources or human remains and the **cumulative impact of the project is less than significant**.

Geology/Soils

Geologic hazards are localized by nature, as they are related to the soils and geologic character of a particular site. Cumulative impacts could occur related to an earthquake, if the magnitude of the quake and location of the fault(s) traversed the region. Impacts due to seismic activity would

be cumulative if state and local building and development codes and regulations (existing regulatory requirements) were not being implemented throughout the region. Pursuant to City and State Building Code requirements, all new development will be required to incorporate appropriate design and construction measures to guard against ground shaking hazards. Further, the project and all other projects and structures will be constructed in compliance with existing seismic safety regulations of the California Uniform Building Code and International Building Code, which requires the use of site-specific engineering and construction standards identified for each class of seismic hazard.

The City of Perris is subject to a number of potential geologic hazards that have the potential to impact future build-out of the City of Perris General Plan. These hazards, including fault rupture hazards, ground shaking, liquefaction, landslides and rockfalls, seismically-induced settlement, subsidence and collapsible soils, and soil erosion and loss of topsoil were addressed in the General Plan EIR and Section 4.6, herein. It was determined that these impacts will be reduced to below the level of significance through implementation of General Plan Implementation Measures and existing regulatory requirements.

Since all local jurisdictions in the region are subject to local, state and federal laws, cumulative impacts related to geologic and soils safety are **less than significant**.

Hazards/Hazardous Materials

The cumulative area for hazards and hazardous materials would be the City of Perris, as the majority of the impacts associated with the transport and use of hazardous materials would occur within City limits. Similarly, City-specific hazardous waste programs and hazardous waste requirements would only apply to projects located within City limits. This cumulative impact analysis considers development of the proposed project, in conjunction with other development in the City and neighboring jurisdictions, as discussed in above. Risks associated with hazardous materials are largely site specific and localized, and are thus limited to the proposed project site. Additionally, site-specific investigations would be conducted at sites where contaminated soils or groundwater could occur to minimize the exposure of workers to hazardous substances. As such, the potential for cumulative impacts to occur is limited.

Although each development site has potentially unique hazardous materials considerations, it is expected that future growth will generally comply with the range of federal, state, and local statutes and regulations applicable to hazardous materials, and will be subject to existing and future programs of enforcement by the appropriate regulatory agencies. For these reasons, cumulative impacts resulting from the release of hazardous materials would be less than significant. Consequently, the proposed project's impact associated with the release of hazardous materials would be **less than cumulatively considerable and thus not significant**.

Hydrology/Water Quality

The geographic context for the Hydrology and Water Quality cumulative impact analysis is the Perris Valley/San Jacinto watershed hydrologic unit and the EMWD service area, including all anticipated cumulative growth within this geographic area as represented by full implementation of the related projects list, as discussed above.

The Perris Valley/San Jacinto watershed hydrologic unit is located in a seiche inundation area related to the Lake Perris reservoir area, and mudflow inundation is possible within the areas of higher relief, such as the coastal mountain range foothills and area surrounding Perris Lake. City codes and ordinances, along with local building restrictions, would minimize impacts associated with, and impacts to, development within these areas. Therefore, there would be no impact associated with seiche or other inundation risk on a cumulative basis and, accordingly, the project would have no contribution to such risk. The cumulative impacts of seiches and mudflows would be less than significant and the proposed project would also result in an impact that is **not cumulatively considerable**.

Continued development within the Perris Valley Channel floodplain could cumulatively restrict flood flows and conveyance capacity as more structures are placed within the floodplain. However, development within the floodplain is restricted and permitted by the City of Perris. Additionally, the Master Drainage Plan (MDP) for the San Jacinto watershed was prepared to define full build-out capacities within the MDP area. At full build-out, cumulative impacts on flood conveyance are expected to be less than significant and the proposed project would, therefore, have an impact that is not cumulatively considerable, and thus **not significant**.

Groundwater supply and aquifer overdraft are currently being assessed and management plans implemented to minimize impacts with increased development on groundwater supplies. According to the City of Perris General Plan 2030 EIR, development consistent with the General Plan will increase the amount of impermeable surfaces thereby causing some diminishment of recharge to the Perris groundwater sub-basins. However, the EIR states that this recharge reduction will likely not be significant and goes on to say that recharge of these sub-basins from current and planned EMWD storage/percolation ponds, and formulation and implementation of an inter-agency management plan for Perris-area groundwater basins will promote maintenance of existing groundwater levels. Additionally, California's Groundwater Bulletin 118 states that the natural recharge for the San Jacinto groundwater basin is primarily from percolation of water in the San Jacinto River and its tributaries with less recharge from rainfall on the valley floor. In fact, the primary recharge area for the basin is in the upper reaches of the San Jacinto River. Recharge also occurs from the percolation of water in Lake Perris while reclaimed water percolates from storage ponds in Hemet and San Jacinto. Increased future demands are expected to be met with additional supplies from MWD (imported water) and groundwater management activities are expected to maintain groundwater levels and safe yields. These groundwater management activities will ensure that groundwater supplies are not depleted or degraded and cumulative impacts would be **less than significant**.

Development within the watershed will result in increased impervious surfaces in addition to changes in land use and associated pollutant runoff characteristics. Increased impervious surfaces are likely to alter existing hydrology, which could increase potential pollutant loads. Additionally, conversion of agricultural lands to urban lands is likely to result in higher pollutant concentrations (primarily heavy metals, oils, and greases) in storm water runoff, while creating an overall reduction in nitrate and salts related to the agricultural production.

The RWQCB has issued an NPDES permit to the City of Perris for storm water discharges. The City of Perris has prepared a storm water management program addressing requirements for

meeting this NPDES permit. Included in the storm water management program is a monitoring and reporting plan and adaptive management strategy for evaluating existing strategies and requirements and implementing additional strategies and requirements, if necessary, to comply with the NPDES permit limits on stormwater discharges to waterbodies. All development and future development must obtain coverage under the NPDES permit. The City of Perris reviews all plans and developments for compliance with existing ordinances (e.g., grading ordinance) and storm water management program requirements. Thus, while continued growth is anticipated to occur, new developments (and significant re-development) will have to comply with these regulations and implement BMPs to minimize pollutant transport. Potential exceedance of water quality standards and criteria, substantial contribution of pollutants to receiving waterbodies, and other potential causes of water quality degradation will be minimal and monitoring and reporting programs will ensure that the storm water management program is adequately protecting water quality or will be adjusted to meet water quality protection goals. Therefore, the cumulative contribution related to impacts to water quality would be less than significant, and the project's contribution is not cumulatively considerable, and thus **less than significant**.

The Lake Perris Reservoir, and the dam that impounds it, is located northeast of the proposed project site. The dam is owned by the California Department of Water Resources (DWR). The DWR Division of Dam Safety regulates the safety and integrity of the dam. By virtue of its location and purpose, the dam is integral to the Lake Perris State Recreation Area which is operated by California State Parks. As the southernmost State Water Project Facility and the southern terminus of the East Branch of the California aqueduct, Metropolitan Water District (MWD) of Southern California is the principal user of water from Lake Perris. The dam is subject to periodic inspection by state authorities and MWD.

The Lake Perris Reservoir is currently being upgraded to withstand the strongest earthquake likely to occur in the area. Simulations of dam or levee failure in the City of Perris show virtually the majority of the City east of Perris Boulevard will be flooded. As a result of its inspections, "DWR has identified potential seismic safety risk in a section of the foundation of the Perris Dam. There is no imminent threat to life or property." The environmental review process for the dam upgrade is currently underway and "completion of the dam remediation design is expected in 2009. Construction is estimated to begin in 2010. Dam completion is expected by 2012. All projects concerning the Perris Dam are anticipated to be complete by 2014." (<http://perrisdam.water.ca.gov>) The possibility of failure due to seismic or other factors is considered by MWD to be extremely remote. The project-related contribution to impacts associated with dam inundation would not be cumulatively considerable, and thus **less than significant**.

Storm water flow conveyance and flood potential will increase as development results in greater amounts of impervious surfaces and channelization for conveyance of peak flows. However, the District and the County's MDP guide and govern local and regional hydrology and hydraulic modifications. The planned drainage capacities have been determined assuming a full build-out scenario. All development within the County of Riverside and the San Jacinto Watershed, including the City of Perris, must comply with the requirements of the NPDES permit, District storm water management plan, MDP, and other pertinent local drainage and conveyance ordinances. Existing regulations effectively minimize potential impacts to flow conveyance and

flooding and have incorporated necessary elements in the MDP. Accordingly, the project-related contribution to impacts associated with storm water flow conveyance and flood potential would not be cumulatively considerable, and thus **less than significant**.

Land Use/Planning

This cumulative impact analysis considers development of the proposed project, in conjunction with other development in the City, in relationship to the City's General Plan land use policies and zoning ordinances, along with other developmental policies, and neighboring jurisdictions. This proposed project is consistent with all of the City's General Plan Policies, zoning regulations and other ordinances. Therefore, the cumulative impacts are considered **not significant**.

Noise

The geographic context for the analysis of cumulative noise impacts is the City of Perris. This cumulative impact analysis considers development of the proposed project, in conjunction with ambient growth and other development within the vicinity of the proposed project. Noise by definition is a localized phenomenon, and drastically reduces in magnitude as distance from the sources increases. Consequently, only projects and growth due to occur in the immediate proposed project area would be likely to contribute to cumulative noise impacts.

Future construction in the area is not expected to result in a cumulatively significant impact in terms of exceeding the noise standards established in the City's General Plan or Noise Ordinance. As discussed in the Noise Section of this document, the City Municipal Code exempts noise generated from construction from noise regulations as long as these activities are limited to between the hours of 7:00 a.m. and 6:00 p.m. Monday through Saturday. Construction is prohibited on Sundays and on all holidays with the exception of Columbus Day and Washington's Birthday. The project's construction noise impacts on-site and for the off-site roadway improvements are localized in nature and decrease substantially with distance. Consequently, in order to achieve a substantial cumulative increase in construction noise levels, more than one source emitting high levels of construction noise would need to be in close proximity to a sensitive noise receptor location in question. Because the probability of future construction sites being located in close enough proximity to one another within the City to raise ambient noise levels by a significant level is considered to be remote and unlikely, the cumulative impact related to construction noise is less than significant. Therefore, the impact of the proposed project's construction would **not be cumulatively considerable or significant**.

For sensitive receptors, where the existing noise level meets or exceeds 60 dBA, an increase of 3 dBA is considered significant as discussed in Section 4.10. An increase in 5 dBA is considered significant for all sensitive receptors along road segments that do not exceed 60 dBA.

As stated in Section 4.10, the existing noise levels at all modeled roadway segments is above 60 dBA, except for three. Of the three, one roadway segment does not exist in the existing condition. Therefore, locations where existing sensitive receptors would experience an increase over the respective threshold would experience a significant cumulative noise impact. **Table 4.10-D, Area-Wide Noise Levels at 50 Feet from Centerline** shows that the proposed project's

contribution to any significant noise impact would not be considerable since contributions of the project would be less than the respective thresholds. Therefore, the proposed project's contribution to cumulative noise impacts would be **less than significant**.

Solid Waste

The cumulative area for solid waste-related issues is Riverside County. AB 939 mandates the reduction of solid waste disposal in landfills. With the implementation of AB 939 provisions, the projected amount of solid waste generated from implementation of the Riverside County General Plan disposed of in landfills at General Plan build out is projected to be 4,148,156 tons per year. With planned expansion activities of County landfills and projected growth rates contained with a Landfill System Capacity Projection Study prepared for the County, the Riverside County Integrated Project FEIR concluded sufficient landfill capacity would exist to accommodate future disposal needs through County build out in 2040¹. Therefore, build out of the County General Plan would not create demands for solid waste services that exceed the capabilities of the County's waste management system. Consequently, cumulative impacts associated with solid waste within the County, including the City of Perris, would be considered **less than significant**.

Transportation/Traffic

Cumulative impacts associated with traffic volumes are determined based on a sum of the proposed project traffic and traffic volumes from approved and pending projects in the area as described in Section 4.12 (Transportation/Traffic).

Once the project-generated traffic is added to all the other approved and pending projects in the project area, the Level of Service (LOS) for the study intersections worsen, unless improvements are made in conjunction with the proposed project and all other area development. The Traffic Study concluded that the project, along with other area development, will have a significant impact on LOS standards on project area roadways without the incorporation of mitigation.

The project will be required to pay TUMF fees and City of Perris Road and Bridge Benefit District (RBBD) fees to help pay for off-site improvements designed to mitigate local and regional traffic impacts to which the project contributes.

As shown in Section 4.12, Transportation and Traffic, **Table 4.12-J**, ten intersections are anticipated to operate at acceptable LOS thresholds without mitigation under existing plus ambient growth plus cumulative development plus project conditions: I-215 Southbound Ramps and Harley Knox Boulevard, I-215 Northbound Ramps and Harley Knox Boulevard, Indian Avenue and Harley Knox Boulevard, I-215 Southbound Ramps and Ramona Expressway, I-215 Northbound Ramps and Ramona Expressway, Nevada Avenue/Patterson Avenue and Ramona Expressway, Webster Avenue and Ramona Expressway, Indian Avenue and Morgan Street, Indian Avenue and Project Driveway, and Indian Avenue and Rider Street. However, with the incorporation of mitigation measures **MM Trans 1 through MM Trans 16**, in the form of

¹ Per the Riverside County Integrated Project FEIR discussion of Solid Waste impacts, Riverside County General Plan build out is assumed in 2040 based on the Southern California Association of Government's (SCAG) projected growth rate for the County.

construction of signals and roadway improvements, or payment of fees, all of the study intersections are projected to operate at LOS D or better (with the exception of some arterials and/or expressways that intersect with Ramona Expressway or I-215 Freeway ramps whereby LOS E is acceptable), thus meeting the City's threshold.

Table 5.0-B, Levels of Service – Existing plus Ambient Growth plus Cumulative plus Project with Mitigation provides the projected levels of service at the study area intersections with mitigation measures **MM Trans 1 through MM Trans 16** incorporated.

Table 5.0-B
Levels of Service – Existing plus Ambient Growth
plus Cumulative plus Project with Mitigation

Intersection	Traffic Control Status	AM Peak Hour		PM Peak Hour	
		Delay (Sec)	LOS	Delay (Sec)	LOS
1. I-215 SB Ramps / Harley Knox Boulevard	Signal	41.0	D	50.3	D
2. I-215 NB Ramps / Harley Knox Boulevard	Signal	39.8	D	37.4	D
3. Indian Avenue / Harley Knox Boulevard	Signal	34.9	C	43.0	D
4. I-215 SB Ramps / Ramona Expressway	Signal	38.9	D	54.7	D
5. I-215 NB Ramps / Ramona Expressway	Signal	30.6	C	27.4	C
6. Nevada Ave-Patterson Ave / Ramona Expressway	Signal	12.8	B	24.2	C
7. Webster Avenue / Ramona Expressway	Signal	33.2	C	36.5	D
8. Indian Avenue / Ramona Expressway	Signal	53.6	D	41.9	D
9. Indian Avenue / Morgan Street	Signal	28.7	C	20.7	C
10. Indian Avenue / Project Driveway	TWSC	17.6	C	24.4	C
11. Indian Avenue / Rider Street	AWSC	34.7	D	21.7	C
12. Car Driveway East / Rider Street	RIRO	9.3	A	9.2	A
13. Truck Driveway East / Rider Street	OWSC	11.4	B	11.8	B
14. Truck Driveway West / Rider Street	OWSC	11.1	B	11.5	B
15. Car Driveway West / Rider Street	OWSC	9.1	A	9.0	A
16. Webster Avenue / Rider Street	OWSC*	10.6	B	10.7	B
17. Webster Avenue / Project Driveway	OWSC	8.9	A	9.0	A

Therefore, the proposed project will not cause an increase in traffic which is cumulatively considerable in relation to the existing traffic load and capacity of the street system, and therefore potential cumulative traffic-related impacts are considered **less than significant with mitigation**.

Water and Sewer

The geographic context for the analysis of cumulative water supply is EMWD's service area. The cities of Hemet, Moreno Valley, Murrieta, Perris, San Jacinto, and Temecula, and portions of western Riverside County represent the service area for EMWD with respect to water supplies. The context for impacts related to wastewater is the service area of the Perris Valley Regional Water Reclamation Facility, which includes the cities of Perris, Sun City, Romoland, and a portion of Moreno Valley.

Implementation of this project would result in less than significant environmental impacts related to water and sewer service and supplies. Other projects (**Table 5.0-A**) in the project vicinity, which also lie within the above-described service areas, will also be required to include their respective water and sewer facilities as project implementation occurs. Overall, EMWD will have to increase their facilities to serve the growing City of Perris. The cumulative growth from this project, along with others, has been addressed by the City in their General Plan EIR, as well as by EMWD in their UWMP process. The City of Perris's General Plan EIR determined that the physical environmental impacts associated with construction of new water and sewer facilities were less than significant. At such time EMWD constructs its own expanded facilities; EMWD will be its own Lead Agency under CEQA and make their own CEQA determinations at the time they construct their planned facilities.

The City of Perris General Plan EIR related to Utilities, which is hereby incorporated by reference, contemplates the project's use as industrial as well as plans for the other projects in general terms related to land use related to water and sewer supplies. The City of Perris General Plan EIR determined that although the City's population would expand and that new water and sewer service would expand along with that growth, that EMWD's analysis and planning has taken and will take the City of Perris General Plan growth into consideration when planning to serve its customers. Therefore, 1) because the project is consistent with the General Plan, 2) since the other projects in the area will also be planned for and supplied by EMWD, and 3) that EMWD has planned for the land use decisions made by the City of Perris in its master water and sewer planning, the impacts from the project are not cumulatively considerable and thus, **less than significant**.

UNAVOIDABLE ADVERSE IMPACTS

This topic is intended to address any impacts that cannot be mitigated to below a level of significance (CEQA Guidelines Section 15126.2). Significant impacts which cannot be avoided or eliminated if the project is implemented have been discussed in detail throughout Section 4.0 of this document and above. A summary of the areas in which impacts cannot be reduced to a level below significance is briefly presented below.

Agricultural Resources

Impacts to agricultural resources are considered significant if the project will result in loss of designated farmland (Prime Farmland, Unique Farmland, or Farmland of Statewide Importance). Development of the proposed project will convert approximately 58 acres of Prime Farmland and approximately 6 acres of Farmland of Local Importance into non-agricultural land uses. The proposed project does not accommodate the preservation of these designated Farmlands.

The project site is located within an area that is converting from agriculture to non-agricultural uses; nevertheless, the existence of accessible groundwater, favorable soil types, and surrounding agriculture makes the project site farmland conversion significant pursuant to the LESA model.

Construction of the proposed project, or either of the alternatives other than the No Project alternative, will result in a loss of designated farmland. There is no feasible mitigation for such

loss. Impacts associated with the loss of designated farmlands from project development remain unavoidable and adverse and are immitigable.

The proposed project will contribute incrementally to a significant cumulative loss of farmland within the City of Perris and western Riverside County. As described in the EIR prepared for the City of Perris General Plan 2030 (Page VI-3), the 1991 General Plan Land Use Element redesignated all agricultural lands for uses other than agriculture. The City of Perris does not have an established fee or other mechanism to offset the loss of farmland county-wide. To achieve the objectives of the project, which is generally consistent with planned land uses and the general urbanization of this portion of the City, the loss of farmland cannot be avoided or mitigated.

Air Quality

The project has significant air quality impacts that cannot be avoided or mitigated to less than significant levels. However, the project will create construction jobs in the short-term and warehouse jobs in the long-term. The project will add to the City's economic growth by generating tax revenue and implementing the City's General Plan. As stated above in the cumulative impact analysis for air quality, the Basin as a whole is in non-attainment for certain pollutants and every additional car on the road contributes to adverse air quality impacts. Therefore, this project does not contribute a unique impact that does not currently exist within the southern California region. Therefore, although the project will have unavoidable impacts to air quality, it is the City's desire to grow, allow for interstate commerce based business in their City, that outweighs these impacts.

Impacts to air quality are considered significant if a project will violate an air quality standard, contribute substantially to an existing air quality violation or result in a cumulatively considerable increase in a criteria pollutant under non-attainment. The proposed project will generate emissions in both the short-term and long-term that is above the SCAQMD regional thresholds even with mitigation measures incorporated, thereby indicating project emissions will violate an air quality standard and contribute substantially to an existing air quality violation. Although mitigation measures have been included which would reduce some short-term and long-term affects of the project, implementation of those mitigation measures does not reduce the impacts to levels below the significance thresholds utilized in this analysis.

Even though the project will result in a cumulatively significant and unavoidable impact from emissions of criteria pollutants under regional thresholds, the project will not contribute, along with other planned projects, to a cumulative impact related to exposure to diesel exhaust based on the analysis contained within the Health Risk Assessment (see Appendix C).

Because it cannot be determined with certainty that the project will not result in a cumulatively considerable incremental contribution to the significant cumulative impact of global climate change and the lack of regulatory thresholds for this type of project, the cumulative impacts of the proposed project on global climate change are considered potentially cumulative considerable and unavoidable.

GROWTH INDUCING IMPACTS

According to CEQA Guidelines (Section 15126.2 [d]), a project may foster economic or population growth, or additional housing, either indirectly or directly, in a geographical area if it meets any one of the following criteria below:

- A project would remove obstacles to population growth.
- Increases in the population may tax existing community service facilities, causing significant environmental effects.
- A project would encourage and facilitate other activities that could significantly affect the environment.

Urbanization of the project site could potentially influence continued development within adjacent properties by providing or extending roadways, extending water and sewer service, and extending energy services to the immediate area. This could eliminate potential constraints for future development in this area.

A project can be considered to have growth inducing impacts if improvement of roadways into the area might encourage development of agricultural or vacant land that might not otherwise be improved. The proposed project site currently has access from existing paved Perris Boulevard, Rider Street, and Indian Street. The project will include a combination of partial and full-width improvements to segments of these streets serving the proposed project. However, these roadways already exist and are contemplated at their ultimate widths by the City's General Plan. The project will simply implement the City's Circulation Element of its General Plan by improving these roadways. Therefore, the proposed project itself is not increasing the number of parcels or service to areas not already planned to be served; the project is implementing the City's General Plan and by adopting their General Plan, the City has planned for the conversion of the project site to urban development.

The proposed project site is located within the service area for the EMWD. EMWD will provide both water and sewer service to the project. The proposed project requires the construction of minimal off-site facilities in order to connect to existing waterlines and existing sewer facilities. However, since EMWD's existing water and sewer facilities currently provide water and sewer service to the project vicinity they would support development within the vicinity of the project, with or without the proposed project.

As discussed in the Land Use and Planning section of this EIR (Section 4.9), the Rados Distribution Center – Perris can be projected to generate 1,156 jobs/employees to the area. The creation of 1,156 new jobs comprises 5.9 percent of the forecasted employment for the City in 2015 and 4.2 percent in 2035. For the Western Riverside County Subregion, the project will constitute 0.2 percent of the forecasted employment in 2015 and 0.1 percent in 2035.

The proposed project intends to establish a development area for a light industrial project, which will bring an additional 1,156 jobs/employees to the area. SCAG's, *The New Economy and Jobs/Housing Balance in Southern California*, further defines jobs/housing balance for this region as an area extending about 14 miles around an employment center with a ratio between

jobs and household on the order of 1.0–1.29 jobs per household. The proposed project will provide employment opportunities for residents within the same local region, thereby contributing to an overall jobs/housing balance. Therefore, the proposed project is consistent with regional growth forecasts and regional jobs/housing balance projections.

The jobs/housing ratio for western Riverside County is projected to be 1.13 in 2015, 1.19 in 2020, 1.24 in 2025, 1.29 in 2030 and 1.33 in 2035. Therefore, western Riverside County is projected to be a jobs/housing balanced area. The jobs/housing ratio for the City of Perris is projected to be 1.15 in 2015, 1.11 in 2020, 1.12 in 2025, 1.15 in 2030 and 1.16 in 2035. Therefore, the City of Perris is also a jobs/housing balanced area. By implementation of the proposed project, the City will further improve the jobs/housing balance.

According to the City of Perris General Plan 2030 EIR, new employees from commercial and industrial development, and new population from residential development represent direct forms of growth. These direct forms of growth have a secondary effect of expanding the size of local markets and inducing additional economic activity in the areas.

SHORT-TERM USES VERSUS LONG-TERM PRODUCTIVITY

If the proposed project is approved and constructed, a variety of short-term and long-term impacts will occur on both local and regional levels. During construction, portions of surrounding lands may be temporarily impacted by dust and noise over the project build-out. Short-term erosion may occur during grading and construction activities. These disruptions, however, are temporary and can be mitigated to a large degree.

The long-term effect of the proposed project and the subsequent development will be to convert the site into light industrial uses. In relation to this process, the characteristics of the physical, biological, cultural, aesthetic, and human environment will be impacted, as with any form of urbanization. The consequences of this urbanization include: increased traffic volumes, incremental degradation of the regional air quality, additional noise created by traffic generated by employees and customers of the project, incremental demands for public services and utilities, and increased natural resource consumption.

Ultimate development of the project would create long-term environmental consequences that are connected with any form of urbanization. However, the proposed project has been designed to benefit the community and population by providing increased opportunities for employment in closer proximity to residential development and will ultimately provide for a form of long-term productivity which appears compatible with human needs in the area.

ALTERNATIVES TO THE PROPOSED PROJECT

The CEQA Guidelines, Section 15126.6, identify the parameters within which consideration and discussion of alternatives to the proposed project should occur. As stated in this section of the guidelines, alternatives must focus on those that are reasonably feasible and which attain most of the basic objectives of the project. Each alternative must be capable of avoiding or substantially lessening any significant effects of the proposed project. The rationale for selecting the alternatives to be evaluated and a discussion of the "no project" alternative are also required, per Section 15126.6.

As stated in Section 1.0 of this DEIR, the project objectives include:

- Establish a modern, economically competitive distribution center to strengthen the City's economic viability by providing jobs;
- Implement the City of Perris General Plan land use designation of Light Industrial;
- Establish a modern, economically competitive distribution center to provide an expanded and diversified economic base for the City;
- Establish a modern, economically competitive distribution center near major transportation routes including freeways;
- Generate local tax revenue for the City of Perris and stimulate economic growth surrounding the project area; and
- Enhance image of the City of Perris by improving vacant property with a modern distribution center which is landscaped and provides improved roadways. .

Each alternative must be capable of avoiding or substantially lessening any significant effects of the proposed project. The significant impacts for which the project alternatives are analyzed against are agricultural resources and air quality.

It is required under CEQA that alternative site(s) be evaluated, if any feasible sites exist, where significant impacts can be lessened. Since one of the project objectives is to implement the City of Perris' General Plan land use designations and policies, industrially-designated land in Perris within the approximately 1,000-acre area of Planning Area 3 near the I-215 was evaluated for alternative sites. The project area is similar to that of the project site (mostly vacant and agricultural uses) with neighboring light industrial uses. The environmental impacts of development on any other vacant site in the vicinity of the project site are expected to be similar to those of the proposed project. Namely, any other physical site location would still result in air quality impacts and depending on the site's current use; it may also have agricultural impacts. Some sites would be closer to the freeway, making the noise and freeway access issues minimally less than the project, however, other sites could be in different Airport Influence Areas in relation to March Air Reserve Base and could offer more airport-related impacts than the project. Additionally, other sites, depending on their biological or cultural resources may have similar or worse impacts than the project as well. Therefore, because the project area does

not offer project sites which would significantly change the environmental impacts addressed in this DEIR, a more meaningful discussion of alternative sites is deemed unnecessary and will not be discussed further in this section.

This section of the DEIR will look at 1) a No Project Alternative that retains the existing agricultural use of the site, 2) a Reduced Square Footage alternative, and 3) a Business Park alternative representing another use allowed under the current General Plan land use designation.

Rationale for Alternative Selection

Pursuant to CEQA (15126.6(a)), each alternative must accomplish most of the basic project objectives and in some way avoid or substantially lessen one or more of the significant effects created by the proposed project. The direct significant environmental effects that result from the proposed project, after mitigation measures are implemented, are impacts to agricultural resources and air quality. The project also contributes to cumulative agricultural resources and air quality impacts.

Any alternatives which considered different land uses, such as residential, were rejected as infeasible because the City's General Plan and zoning designate the project site as industrial and agricultural uses, respectively, and said uses would not meet most of the project's objectives. The surrounding area is also designated for industrial uses and has associated truck traffic. Therefore, residential uses were not considered to be feasible and therefore not considered further in this DEIR.

The project, as proposed, is anticipated to result in unavoidable adverse impacts related to agricultural resources and air quality. Agricultural impacts result from the conversion of the site to non-agricultural uses. Anticipated impacts to air quality by the proposed project will be a result of the additional vehicles within the project area and the truck traffic using the site and generating emissions. Given the nature of the proposed development, an alternative location will not alleviate these impacts, as it will merely shift the impacts to another location, not reduce or eliminate them. The location of the project is appropriate because the use proposed is: 1) consistent with the site's general plan designation, 2) in close proximity to MARB runways, and 3) is near a freeway. Therefore, an alternative location is not considered a feasible alternative to the proposed project.

Description and Evaluation of Alternatives

Three project alternatives were analyzed.

Alternative 1 – No Project – Existing Land Use Alternative

Per CEQA Guidelines Section 15126.6 (3), the "no project" alternative could take two forms: 1) no change from the existing uses or, 2) development into already approved land uses. The proposed project will involve development into land uses consistent with the City of Perris General Plan land use designation of Light Industrial. Since the proposed project is consistent with the approved land use designation, the No Project Alternative analyzed herein is the continued use of the site for passive agriculture and vacant uses.

Alternative 2 – Reduced Square Footage Alternative

For purposes of this analysis, the Reduced Square Footage alternative will reduce the square footage of proposed building by 20 percent. Although the overall square footage of the project could be reduced, not all aspects of development would be reduced equally as a result. **Table 5.0-C** shows a comparison of the proposed project components to Alternative 2 and **Table 5.0-D**, shows a comparison of the proposed project impacts to Alternative 2.

Alternative 3 – Business Park Alternative

Another use of the project site, which would be allowed under the current General Plan designation, would be a business park project. This alternative to the project would typically entail administrative offices in low-rise buildings often accompanied by accessory inventory storage and distribution and other business services. It is assumed that there would be several small buildings with no more than one roll-up door each for truck deliveries. This alternative is envisioned to be less truck-intensive than the proposed project, as it would not be a distribution facility, but rather a place of businesses. Under this alternative, the site is assumed to have 32 percent building coverage and approximately 15 percent landscaping coverage. To determine the total trips for this “business park,” the *Trip Generation Manual, 7th Edition* by the Institute of Transportation Engineers (ITE) was utilized, with a trip generation rate of 11.24 daily trips per 1,000 square feet of Land Use Type 770, Business Park.

Table 5.0-C
Summary Comparison of Proposed Project to Alternatives

Component of Development	Proposed Project	Alternative 1	Alternative 2	Alternative 3
Agricultural Use (acres)	n/a	61.63	n/a	n/a
Warehouse Building (square feet)	1,191,080	n/a	952,864	n/a
Business Park (square feet)	n/a	n/a	n/a	811,840
Traffic (total trips)	1,310 daily	negligible	1,048 daily	9,125 daily
Detention Basin (acres)	1.4	n/a	1.4	1.4
Landscaping (acres)	6.2	n/a	6.2	8.1

Comparison of Alternatives

The matrix approach to comparing the above-described alternatives is used for ease of directly comparing the proposed project's significant effects with those of the alternatives, per CEQA Guidelines Section 15126.6 (d). **Table 5.0-D, Impact Comparison of Alternatives Matrix**, identifies the areas of potential environmental effects per CEQA and ranks each alternative as better, the same or worse than the proposed project with respect to each topic.

Table 5.0-D
Impact Comparison of Alternatives Matrix

Environmental Issue	Proposed Project Rados Distribution Center – Perris	Alternative 1 No Project	Alternative 2 Reduced Square Footage	Alternative 3 Business Park
Agricultural Resources	Significant – Loss of 61.63 acres of farmland. Cumulatively significant – Contributes to area wide loss of farmland.	Better – No loss of farmland. No significant impact.	Same – Loss of 61.63 acres of farmland. Cumulatively significant- Contributes to area wide loss of farmland.	Same – Loss of 61.63 acres of farmland. Cumulatively significant- Contributes to area wide loss of farmland.
Airports	No significant impact, with mitigation.	Better – No impact.	Same – No significant impact, with mitigation.	Same – No significant impact, with mitigation.
Air Quality	Significant – Will exceed SCAQMD short-term and long-term thresholds for criteria pollutants. Cumulatively significant - contributes to exceedance of air quality standards which the Basin is non-attainment. GHG emissions were found to be potentially cumulatively considerable after mitigation in the absence of regulatory thresholds.	Better – Minimal impacts to air quality. No significant impact.	Better – Although reduced building square footage reduces the amount of trips from vehicles related to the project, and emissions would be reduced, there would still be a net increase in emissions, and cumulative impacts related to emissions released in an area that already experiences problems regarding air quality. Cumulatively significant – contributes to exceedance of air quality standards. This alternative in combination with statewide, national, and international emissions could cumulatively contribute to a change in Earth's climate, i.e., global warming.	Worse – This alternative creates more daily trips which increase air pollution in general and GHG emissions, but significantly reduces the amount of truck traffic compared to the project. The reduction in trucks corresponds to reduced impacts related to cumulative health risks when compared to the proposed project's less than significant health risks from diesel truck emissions.
Biological Resources	Less than significant project impacts of natural habitat/open	Better – No loss of 62 acres to development.	Same – This alternative would result in the same loss of open	Same – This alternative would have the same overall loss of

Table 5.0-D
Impact Comparison of Alternatives Matrix

Environmental Issue	Proposed Project Rados Distribution Center – Perris	Alternative 1 No Project	Alternative 2 Reduced Square Footage	Alternative 3 Business Park
	area. Project does not conflict with the MSHCP.		space and habitat. Loss of open area under this Alternative would also be consistent with the MSHCP.	open space, although more landscaping would be provided. This alternative would also be consistent with the MSHCP.
Cultural Resources	Less than significant impacts to cultural resources with mitigation measures incorporated.	Better – Although the site is not expected to harbor significant cultural resources, under this alternative there would not be the prospect of uncovering unknown resources, as no development would be proposed.	Same – This alternative would have the same less than significant impacts, with implementation of the same mitigation measures identified for the proposed project.	Same – This alternative would have the same less than significant impacts, with implementation of the same mitigation measures identified for the proposed project.
Geology and Soils	Less than significant impacts related to seismic shaking and ground failure without mitigation measures incorporated.	Same – No impact.	Same – This alternative would have the same less than significant impacts as the proposed project.	Same – This alternative would have the same less than significant impacts as the proposed project.
Hazards and Hazardous Materials	Less than significant impacts. The project is not located on a hazardous material site pursuant to Government Code Section 65962.5.	Same – No impact due to site characteristics.	Same – No impact due to site characteristics.	Same – No impact due to site characteristics.
Hydrology and Water Quality	Less than significant project impacts with implementation of WQMP and NPDES permit requirements. Project also includes a detention basin as part of the project which reduces impacts to water	Better for Water Quality – The project site is currently vacant and used for agricultural uses. The undeveloped, unpaved nature of the site provides for infiltration of pollutants and so this Alternative would have better water quality impacts	Same – Less than significant project impacts. Although there would be less square footage and therefore less impermeable surfaces, development under this Alternative would result in some amount of increased runoff and associated pollution.	Same – Less than significant project impacts. Although there would be less square footage and therefore less impermeable surfaces, development under this Alternative would result in some amount of increased runoff and associated pollution.

Table 5.0-D
Impact Comparison of Alternatives Matrix

Environmental Issue	Proposed Project Rados Distribution Center – Perris	Alternative 1 No Project	Alternative 2 Reduced Square Footage	Alternative 3 Business Park
	quality and flooding.	than the proposed project. Worse for Hydrology – No flood control aspect would be implemented, and during heavy storm events, sheet flow conditions would continue under the current conditions which does not include storm drain/detention infrastructure.	This Alternative would still include an on-site detention basin to address the water quality and flood control needs of the development.	This Alternative would still include an on-site detention basin to address the water quality and flood control needs of the development.
Land Use and Planning	Consistent with General Plan land use designation and the goals for Planning Area 3 by converting agricultural land to a light industrial uses.	Worse – Without the project, development as anticipated by the City of Perris would not occur.	Same – A less intensive industrial use on the subject site would still be consistent with the City of Perris General Plan land use and policies.	Same – A Business Park on the subject site would still be consistent with the City of Perris General Plan land use and policies.
Noise	Less than significant impacts. The proposed project will create construction and operational noise from increased vehicular traffic, but will not exceed noise standards.	Better – Without project development, there is no short term construction-related noise impacts and no overall increase in traffic noise.	Better – Reduction in the square footage of the buildings would reduce the number of vehicles generated by the proposed project and would reduce the amount of noise generated by those vehicles.	Worse – This alternative increases the overall number of vehicles and the amount of noise generated by those vehicles.
Solid Waste	Less than significant project impacts on solid waste generation.	Better – Will not result in increases in solid waste amounts.	Better – Will generate fewer tons of solid waste annually.	Same – Will result in some amount of increased solid waste annually.
Transportation/ Traffic	Less than significant project impacts with incorporated mitigation measures.	Better – No increase in project-related traffic, however, key roadway improvements would not be provided to the City.	Better – Reduction in the square footage of the project buildings would result in a reduction of project-generated traffic.	Worse – This alternative would create more daily trips compared to the project, which translates to more traffic impacts to local roadways.

Table 5.0-D
Impact Comparison of Alternatives Matrix

Environmental Issue	Proposed Project Rados Distribution Center – Perris	Alternative 1 No Project	Alternative 2 Reduced Square Footage	Alternative 3 Business Park
Water and Sewer	Less than significant project impacts. The design of the proposed project and existing utility capabilities would not result in any significant utility impacts.	Better – No development eliminates the need to install any sewer/water facilities and eliminates any potential utility impacts.	Same – Project would still require installation of sewer/water facilities, however the reduced square footage of buildings may mean that slightly less water is required than the proposed project.	Same – Project would still require installation of sewer/water facilities, however the reduced square footage of buildings may mean that slightly less water is required than the proposed project.
Environmentally Superior to Proposed Project?	N/A	Yes	Yes	No
Meets Most of the Project Objectives?	Yes	No	Yes	Yes

Environmentally Superior Alternative

The CEQA Guidelines, Section 15126.6(e)(2), requires the identification of the environmentally superior alternative. Of the alternatives evaluated above, the No Project (Existing Land Use) alternative is the environmentally superior alternative with respect to reducing impacts created by the proposed project. The CEQA Guidelines also require the identification of another environmentally superior alternative if the No Project alternative is the environmentally superior alternative.

Since the No Project alternative cannot be the “environmentally superior alternative,” Alternative 2 becomes the environmentally superior alternative over the proposed project. This alternative would reduce the square footage of proposed distribution buildings uses by 20 percent. Although the overall square footage of the project could be reduced, not all aspects of development would be reduced equally as a result. Implementation of this alternative would result in a volume reduction of project-generated traffic. The reduced traffic would result in slightly lesser noise impacts, by reducing the amount of vehicle traffic noise, and reduced air quality impacts. However, air quality impacts will not be sufficiently reduced to eliminate significant impact findings. Impacts related to biological, cultural, geology, hazards, hydrology, land use, and utilities (water, sewer, and solid waste) would essentially stay the same as the proposed project.

Regarding the ability of the Alternatives discussed above to meet project objectives, Alternative 2 will not be as economically competitive and more likely not as economically viable for the applicant to propose. Alternative 2’s reduction in the number of vehicles makes it environmentally superior over the proposed project, but it will result in less revenue and thus less tax revenue and fewer jobs to the City. Thus, while the larger project may result in some incrementally more concentrated impacts at and around this project site, overall it would result in fewer cumulative impacts.

SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES WHICH WOULD BE INVOLVED IN THE PROPOSED ACTION SHOULD IT BE IMPLEMENTED

Pursuant to CEQA Guidelines Section 15126.2(c), an environmental impact report must include a description of significant irreversible environmental changes that would be caused by the proposed action. Section 15126.2(c) reads as follows:

“Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.”

Irreversible Commitment of Resources

Implementation of the Rados Distribution Center – Perris project would irreversibly commit approximately 61.63 acres of the project site to development of light industrial uses. In addition, the proposed project would result in a long-term, irreversible change in the visual character of the project site. The agricultural character of the site would be transformed into an urban development. These changes to the visual environment are consistent in keeping with the general trend in the area to convert some agricultural land to urban development.

Construction of the proposed project will require the use of renewable resources such as lumber and other forest products, which could be expected to be replenished over the lifetime of the project. For example, lumber supplies are increased as seedlings mature into trees. As such, the development of the project would not result in the irreversible commitment of renewable resources. Nevertheless, there would be an incremental increase in the demand for these resources during construction of the project.

Construction of the project will also result in the use of non-renewable resources including building materials (e.g., asphalt, petrochemical construction materials, steel, copper and other metals, and sand and gravel) and fossil fuels, including the use of fossil fuels for construction equipment, the transport of construction materials to the project site and the transportation of construction workers to and from the project site (e.g., natural gas, gasoline, diesel fuel and other petroleum-based products). These materials and the resources used in their production are available in a finite supply and are generally not retrievable, although some of the materials are recyclable. Construction materials like concrete and asphalt, for example, can be crushed and recycled as road base. None of these materials are considered to be in short supply and unavailable for use in project construction.

During project operation, the project would result in an irretrievable commitment of nonrenewable resources, such as energy resources and fossil fuels. These energy resources and fossil fuels would be used for heating and cooling of buildings, transportation of people and goods to and from the site, lighting, and other associated energy needs. To the extent that fossil fuels are used to generate electricity and fuel automobiles and trucks, the proposed development would directly reduce existing supplies of fossil fuels and would be a long-term commitment to consumption of an essentially nonrenewable resource. The magnitude of this use will be offset partially by required compliance with Title 24 and other energy conservation measures, and future increased use of renewable sources of electricity (e.g., solar power, wind power, hydroelectricity, and biomass).

Irreversible Environmental Changes

An unavoidable significant adverse impact is the degradation of regional air quality caused by the cumulative effect of numerous projects in the City of Perris, including the proposed project. The proposed project in combination with statewide, national, and international emissions could cumulatively contribute to a change in Earth's climate, i.e., global warming. Therefore, the project will also have a potentially significant cumulative impact on global climate change.

Implementation of the project would result in significant but mitigable impacts associated with airports, biological resources, cultural resources, hazards and hazardous materials, and transportation and traffic. Incorporation of mitigation measures presented in this EIR will reduce impacts associated with these environmental issues to below a level of significance. Impacts associated with geology and soils, hydrology and water quality, land use and planning, noise, solid waste, and water and sewer were determined to be below the level of significance due to project design features and/or compliance with regulatory requirements. Impacts associated with aesthetics, mineral resources, public services, and recreation were determined not be significant in the Notice of Preparation (Appendix A).

Project-specific impacts related to agricultural resources and air quality would be significant and immitigable at the project level. These issues were also found to have significant cumulative impacts. These impacts would require adoption of a Statement of Overriding Considerations.

Potential Environmental Damage from Accidents

The project proposes warehouse/distribution facilities. The project as proposed will not emit hazardous emissions from non-vehicular sources or handle hazardous or acutely hazardous materials, substances, or waste, and its operation would not be expected to cause environmental accidents that would affect other areas. The project site is located within a seismically active region and would be exposed to ground shaking during a seismic event. In order to address the potential for moderate to severe ground-shaking that may occur during the lifetime of the proposed structures, the project will follow engineering and design parameters in accordance with the most recent edition of the UBC and/or the Structural Engineers Association of California parameters, as required in standard City conditions of approval.

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Location	Address
City of Perris	135 North "D" Street Perris, CA 92570 (951) 943-5003
Southern California Association of Governments	3600 Lime Street, Suite 216 Riverside, CA 92501 (951) 784-1513
Riverside County Planning Department	4080 Lemon Street, 9 th Floor Riverside, CA 92501

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3.0 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation measures were incorporated into this project to reduce environmental impacts identified in the project Draft and Final Environmental Impact Reports (DEIR and FEIR). Pursuant to Section 15097, a written monitoring and reporting program has been compiled to verify implementation of adopted mitigation measures. “Monitoring” refers to the ongoing or periodic process of project oversight provided by the “Responsible Party” listed in the following table. “Reporting” refers to written compliance review that will be presented to the decision making body or authorized staff person identified in the table below. A report can be required at various stages throughout the project implementation or upon completion of the mitigation measure. The following table provides the required information which includes identification of the potential impact, various mitigation measures, applicable implementation timing, agencies responsible for implementation, and the monitoring/reporting method for each mitigation measure identified.

The following mitigation measures contain several acronyms that are defined in the DEIR and FEIR, but may not be defined in the following mitigation measures. As used in the mitigation measures, these acronyms are defined as follows:

CARB	California Air Reserve Board
CDFG	California Department of Fish and Game
CEQA	California Environmental Quality Act
City	City of Perris
FAA	Federal Aviation Administration
HCP	Habitat Conservation Plan
MARB	March Air Reserve Base
NO _x	Oxides of Nitrogen
MSHCP	Multiple Species Habitat Conservation Plan
PRC	Public Resources Code
PRMTP	Paleontological Resources Monitoring and Treatment Plan
SCAQMD	South Coast Air Quality Management District
SKR	Stephens’ Kangaroo Rat
VOC	Volatile organic compounds

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Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Airport Hazards				
Result in a safety hazard for people residing or working in the project area where located within an airport land use plan or, where such a plan has not been adopted, within two miles of public airport or public use airport.	MM Airport 1: All street lights and other outdoor lighting shall be hooded or shielded to prevent either the spillage of lumens or reflection into the sky or above the horizontal plane.	Prior to approval of street improvement plans and prior to building permits	City of Perris Public Works/ Engineering Administration Division Building Division	City to ensure that specified lighting is included.
	MM Airport 2: The following notice shall be provided to all potential purchasers and tenants: “This property is presently located in the vicinity of an airport, within what is known as an airport influence area. For that reason, the property may be subject to some of the annoyances or inconveniences associated with proximity to airport operations (for example, noise, vibration, or odors). Individual sensitivities to those annoyances can vary from person to person. You may wish to consider what airport annoyances, if any, are associated with the property before you complete your purchase and determine whether they are acceptable to you. Business & Profession Code 11010 12(A)”	Prior to certificate of occupancy	City of Perris Planning Division	City to confirm that proper notice has been provided.
	MM Airport 3: The following uses shall be prohibited: (a) Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than an FAA-approved navigational signal light or visual approach slope indicator. (b) Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an aircraft engaged in a straight final approach towards a landing at an airport. (c) Any use which would generate smoke or water vapor or which would attract large concentrations of birds, or which may	Prior to certificate of occupancy	City of Perris Building Division	City to confirm that no proposed businesses contain any prohibited uses.

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Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Airport Hazards				
	otherwise affect safe air navigation within the area.			
	(d) Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.			
	MM Airport 4: Prior to recordation of a final map, issuance of building permits, or conveyance to an entity exempt from the Subdivision Map Act, whichever occurs first, the landowner shall convey an aviation easement to March Air Reserve Base.	Prior to recordation of a final map, issuance of building permits, or conveyance to an entity exempt from the Subdivision Map Act, whichever occurs first	City of Perris Building Division Landowner MARB	Proof of aviation easement shall be provided to applicable entity
Air Quality				
Violate any air quality standard or contribute substantially to an existing or projected air quality violation.	MM Air 1: Electricity from permanent or temporary power poles shall be used instead of temporary diesel- or gasoline-powered generators to reduce the associated emissions.	Prior to grading permit	City of Perris Planning Division Contractor	Contractor to show power connection for construction purposes for Planning Division approval.
Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).	MM Air 2: All retail/commercial/industrial land uses shall apply paints using either high volume low pressure (HVLP) spray equipment with a minimum transfer efficiency of at least 50% or other application techniques with equivalent or higher transfer efficiency.	Prior to building permit	City of Perris Building Division	City to confirm that this requirement appears in the building construction specifications.

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Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Air Quality				
	<p>MM Air 3: Prior to issuance of the grading permit(s), the applicant(s) shall submit a traffic control plan that will describe in detail safe detours and provide temporary traffic control during construction activities. To reduce traffic congestion, and therefore NO_x, the plan shall include, as necessary, appropriate, and practicable, the following: temporary traffic controls such as a flag person during all phases of construction to maintain smooth traffic flow, dedicated turn lanes for movement of construction trucks and equipment on- and off-site, scheduling of construction activities that affect traffic flow on the arterial system to off-peak hour, rerouting of construction trucks away from congested streets or sensitive receptors, and/or signal synchronization to improve traffic flow.</p>	Prior to grading permit	City of Perris Public Works/ Engineering Administration Division and Planning Division	City Planning Division to confirm that the Public Works/Engineering Administration Division is satisfied with the Traffic Control Plan. Compliance monitored by City Engineer.
	<p>MM Air 4: During construction, all vehicles and equipment shall be properly maintained according to manufacturers' specifications at an offsite location, which includes proper tuning and timing of engines. Equipment maintenance records and equipment design specification data sheets shall be kept on site during construction.</p>	During construction	Contractor City of Perris Planning Division	Equipment maintenance records and equipment design specification data sheets shall be kept on-site and available for review by the City or SCAQMD during construction.
	<p>MM Air 5: The project developer shall require by contract specification that construction equipment used for construction meets or exceeds Tier 3 standards. Alternatively, all construction equipment shall be equipped with CARB-verified oxidation catalysts, diesel particulate traps or other verified or certified retrofit technologies with the greatest control efficiency for the specific category of equipment. Contract specifications shall be included in project construction documents, which shall be reviewed by the City of Perris prior to issuance of a grading permit.</p>	Prior to grading permits	City of Perris Planning Division	Submittal of project construction specifications for approval.

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Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Air Quality	MM Air 6: All construction vehicles shall be prohibited from idling in excess of five minutes, both on site and off site.	Prior to grading permit and during construction	City of Perris Planning Division.	City of confirm that this requirement appears in the building construction specifications.
	MM Air 7: Construction parking shall be configured to minimize traffic interference.	Prior to grading permit and during construction	City of Perris Public Works/ Engineering Administration And Planning Division	City Planning Division to confirm that the Public Works/Engineering Administration Division is satisfied with the Traffic Control Plan.
	MM Air 8: To reduce VOC emissions associated with architectural coating, the project designer and contractor shall reduce the use of paints and solvents by utilizing pre-coated materials (e.g. bathroom stall dividers, metal awnings), materials that do not require painting, and require coatings and solvents with a VOC content lower than required under Rule 1113 to be utilized. The construction contractor shall be required to utilize "Super-Compliant" VOC paints, which are defined in SCAQMD's Rule 1113. Construction specifications shall be included in the building specifications that assure these requirements are implemented. The specifications shall be reviewed by the City of Perris' Building Division for compliance with this mitigation measure prior to issuance of a building permit.	Prior to the issuance of building permit	City of Perris Planning Division	Construction specifications shall be included in the building specifications that assure these requirements are implemented.
	MM Air 9: The developer shall comply with SCAQMD Rule 403. The developer shall provide the City of Perris with the SCAQMD-approved dust control plan, or other sufficient proof of compliance with Rule 403, prior to grading permit issuance.	Prior to grading permit	City of Perris Planning Division	Approved dust control plan or other sufficient proof of compliance with Rule 403 Compliance monitored by City Engineer.

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Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Air Quality	MM Air 10: All vehicles shall be prohibited from idling in excess of five minutes.	Prior to certificate of occupancy	City of Perris Planning Division	Confirmation that signs have been posted on the building limiting idling.
	MM Air 11: Loading bays shall be equipped with electrification, and/or auxiliary power units.	Prior to building permits	City of Perris Planning Division	Confirmation that architectural plans include electrification, and/or auxiliary power units.
	MM Air 12: Roads and parking areas shall be paved.	Prior to building permit	City of Perris Planning Division	Confirmation that architectural/site plans include paved areas.
	MM Air 13: The project shall post contact information outside the facility for the public to call if a specific air quality issue arises. The individual charged with receipt of these calls shall respond to the caller within 24 hours and resolution of the air quality issue, if valid, will occur as soon as possible.	Prior to sign approvals	City of Perris Planning Division	Ensure that signs providing this information are provided.
	MM Air 14: In order to promote alternative fuels, and help support "clean" truck fleets, the developer/successor-in-interest shall provide building occupants and businesses with information related to SCAQMD's Carl Moyer Program, or other state programs that provide funding for cleaner than required heavy-duty engines and emission control devices, such as 2007 or newer model year or 2010 compliant vehicles.	Prior to certificate of occupancy	City of Perris Planning Division	Confirmation that tenants have been provided with information regarding funding for cleaner than required heavy-duty engines and emission control devices.
	MM Air 14a: Service equipment at the facility will be either low-emission propane powered or electric (i.e., forklifts).	Set forth as Condition of Approval prior to project approval.	City of Perris Planning Division	Confirmation that lease agreements include this restriction.

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Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Air Quality	MM Air 15: The project shall be, at a minimum, required to increase building energy performance 14 percent beyond Title 24, and reduce water use by 20 percent. Prior to issuance of any building permits, building plans shall include proof of these reductions.	Prior to building permits	City of Perris Building Division	Submission of a Title 24 worksheet with building plans shall be required.
	MM Air 16: The project shall be required to use recycled materials for at least 15 percent of construction materials. Regional materials that are extracted, processed, and manufactured regionally will also be required to account for 10 percent of the project.	Prior to building permits	City of Perris Building Division	Construction specifications to include reporting procedure so City can verify compliance.
	MM Air 17: The project shall be required to recycle and/or salvage at least 75 percent of non-hazardous construction and demolition debris by weight and volume.	Prior to building permits	City of Perris Planning Division	Construction specifications to include reporting procedure so City can verify compliance.
	MM Air 18: In order to reduce energy consumption from the proposed project development, applicable plans (e.g., electrical plans, improvement maps, etc.) submitted to the City shall include the installation of energy-efficient street lighting throughout the project site. These plans shall be reviewed and approved by the applicable City Department (e.g., Building Division or Department of Public Works/Engineering) prior to conveyance of applicable streets.	Prior to conveyance of applicable streets	City of Perris Building Division or Department of Public Works/ Engineering Administration Division	Applicable plan shall indicate energy-efficient street lighting throughout the project.

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Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Biological Resources				
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.	<p>MM Bio 1: A pre-construction survey for resident burrowing owls will be conducted by a qualified biologist no more than 30 days prior to commencement of grading and construction activities within those portions of the project site containing suitable burrowing owl habitat. The time lapse between surveys and site disturbance should not exceed 30 days. Additional surveys are necessary when the initial disturbance is followed by periods of inactivity or the development is phased spatially and/or temporally over the project site. Burrowing Owl surveys will be conducted in accordance with the methodologies prescribed by CDFG in their 1995 Staff Report and the Burrowing Owl Consortium in their 1993 Burrowing Owl Survey Protocol and Mitigation Guidelines.</p> <p>If active nests are identified on site during the pre-construction survey, they shall be avoided or the owls actively or passively relocated. To adequately avoid active nests, no grading or heavy equipment activity shall take place within at least 250 feet of an active nest during the breeding season (February 1 through August 31), and 160 feet during the non-breeding season.</p> <p>If burrowing owls occupy the site and cannot be avoided, active or passive relocation shall be used to exclude owls from their burrows, as agreed to by the City of Perris Planning Department and the California Department of Fish and Game. Relocation shall be conducted outside the breeding season or once the young are able to leave the nest and fly. Passive relocation is the exclusion of owls from their burrows (outside the breeding season or once the young are able to leave the nest and fly) by installing one-way doors in burrow entrances. These one-way doors allow the owl to exit the burrow, but not enter it. These doors shall be left in place 48 hours to ensure owls have left the burrow. Artificial burrows shall be provided nearby. The project area shall be monitored daily for one week to confirm owl use of burrows before excavating burrows in the impact area. Burrows shall be excavated using hand tools and refilled to prevent</p>	No more than 30 days prior to grading or construction activities and prior to issuance of grading permit	Developer Qualified Biologist City of Perris Planning & Building Division	Developer shall hire a qualified biologist to perform a pre-construction survey. Report shall be provided to the City of Perris Planning Division and the Planning Division. shall notify the Building Division of compliance, prior to the issuance of a grading permit.

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Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Biological Resources				
	<p>reoccupation. Sections of flexible pipe shall be inserted into the tunnels during excavation to maintain an escape route for any animals inside the burrow. The CDFG shall be consulted prior to any active relocation to determine acceptable receiving sites available where this species has a greater chance of successful long-term relocation.</p> <p>MM Bio 2: In order to avoid violation of the MBTA and California Fish and Game Code site-preparation activities (removal of trees and vegetation) shall be avoided, to the greatest extent possible, during the nesting season (generally February 1 to August 31) of potentially occurring native and migratory bird species.</p> <p>If site preparation activities are proposed during the nesting/breeding season (February 1 to August 31), a pre-activity field survey shall be conducted by a qualified biologist to determine if active nests of species protected by the Migratory Bird Treaty Act (MBTA) or the California Fish and Game Code are present in the construction zone. If active nests are not located within the project area and appropriate buffer, construction may be conducted during the nesting/breeding season. However, if active nests are located during the pre-activity field survey, no grading or heavy equipment activity shall take place within at least 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected (under MBTA or California Fish and Game Code) bird nests (non-listed), or within 100 feet of sensitive or protected songbird nests until the nest is no longer active.</p>	<p>Mitigation measure required only between February 1 and August 31</p> <p>No more than 30 days prior to issuance of grading permit</p>	<p>Developer Qualified Biologist City of Perris Planning & Building Divisions</p>	<p>Developer shall hire a qualified biologist to perform a pre-activity survey if site preparation is to occur between February 1 and August 31. Report shall be provided to the City of Perris Planning Division and the Planning Division shall notify the Building Division of compliance, prior to the issuance of a grading permit.</p>

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Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Biological Resources				
	MM Bio 3: The purpose of the MSHCP is to conserve open space and habitat on a county-wide, cumulative basis. Potential impacts to the SKR are mitigated on a regional basis through compliance the SKR HCP mitigation fees. To address the impacts associated with the cumulative loss of habitat for special status species, the proposed project shall be conditioned to pay the MSHCP mitigation fees as set forth under Ordinance No. 1123 and the City of Perris' Stephens' Kangaroo Rat mitigation fees as set forth under Ordinance No. 794.	Prior to the issuance of grading permits.	City of Perris Planning Division	Payment of fees.
Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Cultural Resources				
The project would cause a substantial adverse change in the significance of an archeological resource pursuant to Section 15064.5 of the <i>CEQA Guidelines</i> .	MM Cultural 1: Prior to grading of the project site, the project developer shall hire a qualified archaeologist to provide cultural resource monitoring services at the project site. Selection of the archaeologist shall be subject to the approval of the City of Perris Planning Manager and no grading activities shall occur at the site until the archaeologist has been approved by the City. During grading activities, the archaeologist shall monitor earthmoving activities at the project site consistent with Public Resources Code Section 21083.2(b), (c), and (d). The archaeologist shall be equipped to record and salvage cultural resources that may be unearthed during grading activities. The archaeologist shall be empowered to temporarily halt or divert grading equipment to allow recording and removal of the unearthed resources. If the archaeologist identifies resources of a prehistoric or Native American origin, a Native American observer shall be added to the monitoring program and accompany the archaeologist for the duration of the grading phase. Any Native American resources shall be evaluated in accordance with the <i>CEQA Guidelines</i> and either reburied at the project site or curated at an accredited facility approved by the City of Perris. Once grading activities have ceased or the archaeologist determines that monitoring is no longer necessary, monitoring activities can be discontinued.	During grading	Developer or its Contractor Qualified Archaeologist City of Perris Planning Manager and Planning Division	Project developer or its contractor shall provide the name of the qualified archaeologist that has been requested to perform cultural resource monitoring at the project site. A qualified archaeologist meets, at a minimum, the United States Secretary of the Interior's professional qualification standards and the minimum criteria for recognition by the Register of Professional

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Section 3.0 - Mitigation Monitoring And Reporting Program

Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Cultural Resources				
				Archaeologists (RPA), in accordance with City of Perris protocol. After the Planning Manager has approved the selection of the qualified archaeologist, the qualified archaeologist shall provide the City Planning Division with a Phase IV Cultural Resources Monitoring Report of the findings and recommendations. A copy of the Phase IV Cultural Resources Monitoring Report shall be distributed to the Eastern Information Center.
The project would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	MM Cultural 2: Prior to the issuance of grading permits, a qualified paleontologist shall be retained to develop a paleontological resources monitoring and treatment plan (PRMTP) in accordance with the provisions of CEQA as well as the proposed guidelines of the Society of Vertebrate Paleontology, and shall include, but not be limited to the following: 1. The excavation of areas identified as likely to contain paleontological resources shall be monitored by a full-time qualified paleontological monitor. Monitoring shall be restricted to undisturbed subsurface areas of older	Prior to grading permit	Developer or its Contractor Qualified Paleontological Monitor City of Perris Planning Division	PRMTP shall be prepared and submitted to the City Planning Division for review and approval prior to issuance of grading permits. Final monitoring and mitigation report of the findings shall be submitted to the City Planning Division

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Section 3.0 - Mitigation Monitoring And Reporting Program

Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Cultural Resources				
	<p>alluvium, which might be present below the surface. The monitor shall be prepared to quickly salvage fossils as they are unearthed to avoid construction delays. The monitor shall also remove samples of sediments which are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor must have the power to temporarily halt or divert grading equipment to allow for removal of abundant or large specimens.</p> <p>2. Collected samples of sediments shall be washed to recover small invertebrate and vertebrate fossils. Recovered specimens shall be prepared so that they can be identified and permanently preserved.</p> <p>3. Specimens shall be identified and curated, and placed into a repository (such as the Western Science Center or the Riverside Metropolitan Museum) with permanent curation and retrievable storage.</p> <p>4. A report of findings, including an itemized inventory of recovered specimens, shall be prepared upon completion of the steps outlined above. The report shall include a discussion of the significance of all recovered specimens. The report and inventory, when submitted to the City of Perris Planning Division, will signify completion of the program to mitigate impacts to paleontological resources.</p>			within 60 days of completion of the grading activities.
The project would disturb any human remains, including those interred outside of formal cemeteries.	<p>MM Cultural 3: In the event that human remains (or remains that may be human) are discovered at the implementing development project site during grading or earthmoving, the construction contractors shall immediately stop all activities in the immediate area of the find. The project proponent shall then inform the City of Perris Planning Division immediately and retain a professional archaeologist to assess the find. In accordance with the California Health and Safety Code, the City</p>	During construction	Developer or its Contractor County Coroner City of Perris Planning Division	Implementation of CA Health & Safety Code Section 7050.5 and CA PRC Section 5097.98; and if the Coroner determines that the remains are of Native American origin, the Coroner shall contact the

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Section 3.0 - Mitigation Monitoring And Reporting Program

Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Cultural Resources				
	<p>of Perris will contact the County Coroner's office within 24 hours and the coroner will be permitted to examine the remains.¹ Despite the affiliation of any Native American observers at the site, the Commission's identification of the MLD will stand. The disposition of the remains will be determined in consultation with the City of Perris, the project proponent, and the MLD. The City of Perris will be responsible for the final decision, based upon input from the various stakeholders.</p> <p>If the human remains are determined to be other than Native American in origin, but still of archaeological value, the remains will be recovered for analysis and subject to curation or reburial at the expense of the project proponent. If deemed appropriate, the remains will be recovered by the coroner and handled through the Coroner's Office.</p> <p>Coordination with the Coroner's Office will be through the City of Perris and in consultation with the various stakeholders.</p> <p>The specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. The locations will be documented by the consulting archaeologist in conjunction with the various stakeholders.</p>			<p>Native American Heritage Commission within 24 hours for identification of the Most Likely Descendant, pursuant to Section 15064.5(e) of the <i>CEQA Guidelines</i>.</p> <p>City to have final determination if impasse occurs between land owner, most likely descendant and archaeologist.</p>

¹ The "Most Likely Descendant" ("MLD") is a reference used by the California Native American Heritage Commission to identify the individual or population most likely associated with any human remains that may be identified within a given project area. Under California Public Resources Code section 5097.98, the Native American Heritage Commission has the authority to name the MLD for any specific project and this identification is based on a report of Native American remains through the County Coroner's office. In the case of the City of Perris, the Native American Heritage Commission may identify any Luiseño descendant, but generally names the Soboba or Pechanga bands of Mission Indians (both Luiseño populations) and alternates between the two groups. The City of Perris will recognize any MLD identified by the Native American Heritage Commission without giving preference to any particular population. In cases where the Native American Heritage Commission is not tasked with the identification of a Native American representative, the City of Perris reserves the right to make an independent decision based upon the nature of the proposed project.

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Section 3.0 - Mitigation Monitoring And Reporting Program

Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Geology/Soils				
The project will not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking and seismic-related ground failure, including liquefaction. However, to ensure that imported soil is not contaminated, mitigation is required.	MM Geo 1: Fill material imported from other areas shall be tested to assess that it is suitable to be used as fill, including testing for unsafe levels of hazardous materials, prior to placement on site.	Prior to grading permit	City of Perris Public Works/ Engineering Administration Division Building Division	City to ensure that fill material has been tested and is suitable.

Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Transportation/Traffic				
Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system, or exceed, either individually or cumulatively, a level of service standard established by the city/county congestion management agency for designated roads or highways.	MM Trans 1: Indian Avenue shall be improved to its full street right-of-way to the center lane, plus 15 feet where it fronts the project site.	Prior to approval of street improvement plans Prior to certificate of occupancy	City of Perris Public Works/ Engineering Administration Division City of Perris Building Division	City to ensure that specified cross-sections are provided on the plans and constructed to the City's satisfaction prior to the issuance of a certificate of occupancy.

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 Section 3.0 - Mitigation Monitoring And Reporting Program

Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Transportation/Traffic	MM Trans 2: Indian Avenue shall be constructed as a 42-foot pilot road from the northern edge of the project site to Harley Knox Boulevard.	Prior to approval of street improvement plans Prior to certificate of occupancy	City of Perris Public Works/ Engineering Administration Division City of Perris Building Division	City to ensure that specified cross-sections are provided on the plans and constructed to the City's satisfaction prior to the issuance of a certificate of occupancy.
	MM Trans 3: Webster Avenue shall be improved to its full street right-of-way to the center lane, plus 15 feet where it fronts the project site.	Prior to approval of street improvement plans Prior to certificate of occupancy	City of Perris Public Works/ Engineering Administration Division City of Perris Building Division	City to ensure that specified cross-sections are provided on the plans and constructed to the City's satisfaction prior to the issuance of a certificate of occupancy.
	MM Trans 4: Rider Street shall be improved to its full street right-of-way to the center lane, plus 15 feet where it fronts the project site, eastward to Perris Boulevard.	Prior to approval of street improvement plans Prior to certificate of occupancy	City of Perris Public Works/ Engineering Administration Division City of Perris Building Division	City to ensure that specified cross-sections are provided on the plans and constructed to the City's satisfaction prior to the issuance of a certificate of occupancy.
	MM Trans 5: Sight distance at the project entrance roadway shall be reviewed with respect to standard City of Perris sight distance standards at the time of preparation of final grading, landscape and street improvement plans.	Prior to approval of street improvement plans	City of Perris Public Works/ Engineering Administration Division	Approval of street improvement plans.

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Section 3.0 - Mitigation Monitoring And Reporting Program

Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Transportation/Traffic	MM Trans 6: The proposed project shall participate in the phased construction of off-site traffic signals through payment of the project's fair share of traffic signal mitigation fees.	Prior to first building permit	City of Perris Public Works/ Engineering Administration Division	Submittal of traffic signal mitigation fee.
	MM Trans 7: Signing/stripping shall be implemented in conjunction with detailed construction plans for the project site.	Prior to the final site plan approval	City of Perris Public Works/ Engineering Administration Division	City to ensure that specified signing/stripping is provided on the plans prior to the final site plan approval and implemented to the City's satisfaction prior to the issuance of a certificate of occupancy.
	MM Trans 8: Construct the intersection of Indian Avenue and Project Driveway to include the following geometrics:	Prior to approval of street improvement plans	City of Perris Public Works/ Engineering Administration Division	City to ensure that specified cross-sections are provided on the plans and constructed to the City's satisfaction prior to the issuance of a certificate of occupancy.
	Northbound: One left turn lane. One shared through and right turn lane. Southbound: One left turn lane. One shared through and right turn lane. Eastbound: One shared left turn, through, and right turn lane. Stop controlled. Westbound: One shared left turn, through, and right turn lane. Stop controlled.	Prior to certificate of occupancy	City of Perris Building Division	

Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Transportation/Traffic				
MM Trans 9: Modify the intersection of Indian Avenue and Rider Street to include the following geometrics:	Northbound: One left turn lane. One shared through and right turn lane. Stop controlled.	Prior to approval of street improvement plans	City of Perris Public Works/ Engineering Administration Division	City to ensure that specified cross-sections are provided on the plans and constructed to the City's satisfaction prior to the issuance of a certificate of occupancy.
	Southbound: One left turn lane. One shared through and right turn lane. Stop controlled.	Prior to certificate of occupancy	City of Perris Building Division	
	Eastbound: One left turn lane. One shared through and right turn lane. Stop controlled.			
	Westbound: One left turn lane. One shared through and right turn lane. Stop controlled.			
MM Trans 10: Construct the intersection of Car Driveway East and Rider Street to restrict movement to right-in and right-out only from the driveway with the following geometrics:	Northbound: Not Applicable.	Prior to approval of street improvement plans	City of Perris Public Works/ Engineering Administration Division	City to ensure that specified cross-sections are provided on the plans and constructed to the City's satisfaction prior to the issuance of a certificate of occupancy.
	Southbound: One right turn lane. Stop controlled.	Prior to certificate of occupancy	City of Perris Building Division	
	Eastbound: One through lane.			
	Westbound: One shared through and right turn lane.			
MM Trans 11: Construct the intersection of Truck Driveway East and Rider Street to include the following geometrics:	Northbound: Not Applicable.	Prior to approval of street improvement plans	City of Perris Public Works/ Engineering Administration Division	City to ensure that specified cross-sections are provided on the plans and constructed to the City's satisfaction prior to the issuance of a certificate of occupancy.
	Southbound: One shared left turn and right turn lane. Stop controlled.	Prior to certificate of occupancy	City of Perris Building Division	
	Eastbound: One left turn lane. One through lane.			
	Westbound: One shared through and right turn lane.			

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Section 3.0 - Mitigation Monitoring And Reporting Program

Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Transportation/Traffic	MM Trans 12: Construct the intersection of Truck Driveway West and Rider Street to include the following geometrics:	Prior to approval of street improvement plans	City of Perris Public Works/ Engineering Administration Division	City to ensure that specified cross-sections are provided on the plans and constructed to the City's satisfaction prior to the issuance of a certificate of occupancy.
	Northbound: Not Applicable.			
	Southbound: One shared left turn and right turn lane. Stop controlled.	Prior to certificate of occupancy	City of Perris Building Division	
	Eastbound: One left turn lane. One through lane.			
	Westbound: One shared through and right turn lane.			
	MM Trans 13: Construct the intersection of Car Driveway West and Rider Street to include the following geometrics:	Prior to approval of street improvement plans	City of Perris Public Works/ Engineering Administration Division	City to ensure that specified cross-sections are provided on the plans and constructed to the City's satisfaction prior to the issuance of a certificate of occupancy.
	Northbound: Not Applicable.			
	Southbound: One shared left turn right turn lane. Stop controlled.	Prior to certificate of occupancy	City of Perris Building Division	
	Eastbound: One shared left turn through lane.			
	Westbound: One shared through and right turn lane.			
	MM Trans 14: Construct the intersection of Webster Avenue and Rider Street to include the following geometrics:	Prior to approval of street improvement plans	City of Perris Public Works/ Engineering Administration Division	City to ensure that specified cross-sections are provided on the plans and constructed to the City's satisfaction prior to the issuance of a certificate of occupancy.
	Northbound: Not Applicable.			
	Southbound: One left turn lane. One right turn lane. Stop controlled.	Prior to certificate of occupancy	City of Perris Building Division	
	Eastbound: One left turn lane. One through lane.			
	Westbound: One shared through and right turn lane.			

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Section 3.0 - Mitigation Monitoring And Reporting Program

Impact Category /Threshold	Mitigation Measure	Implementation Timing	Responsible Party	Method of Reporting/ Monitoring
Transportation/Traffic	MM Trans 15: Construct the intersection of Webster Avenue and Project Driveway to include the following geometrics:	Prior to approval of street improvement plans	City of Perris Public Works/ Engineering Administration Division	City to ensure that specified cross-sections are provided on the plans and constructed to the City's satisfaction prior to the issuance of a certificate of occupancy.
	Northbound: One shared through and right turn lane.	Prior to certificate of occupancy	City of Perris Building Division	
	Southbound: One shared left turn and through lane.			
	Eastbound: Not Applicable.			
	Westbound: One shared left turn and right turn lane. Stop controlled.			
	MM Trans 16: The project shall participate in the cost of off-site improvements through payment of the fair share mitigation fees. These fees shall be collected and utilized as needed by the City of Perris to construct the improvements necessary to maintain the required level of service and build roads to the general plan build-out level.	Prior to building permit	City of Perris Public Works/ Engineering Administration Division	Receipt of payment.

**STATEMENT OF FACTS IN SUPPORT OF FINDINGS REGARDING
THE SIGNIFICANT ENVIRONMENTAL EFFECTS RESULTING FROM
THE RADOS DISTRIBUTION CENTER PROJECT
(ENVIRONMENTAL IMPACT REPORT SCH NO. 2008111080)**

I. INTRODUCTION

The City of Perris (the “City”), as the lead agency, has prepared the Final Environmental Impact Report (“Final EIR”) for the Rados Distribution Center – Perris project (“the proposed project”). The Final EIR has State Clearinghouse No. 2008111080.

The March 2010 Draft Environmental Impact Report (“Draft EIR”) assesses the potential environmental effects of the proposed project, identifies means to eliminate or reduce potential significant adverse impacts, and evaluates a reasonable range of alternatives to the proposed project. The Final EIR consists of the Response to Comments received on the Draft EIR, the Mitigation Monitoring and Reporting Program, and the Revised Draft EIR (as revised based on the comments received by the City during the Draft EIR public review period). The City also received comment letters after the end of the public review period for the Draft EIR. The Final EIR includes the City’s responses to these late letters.

Pursuant to California Code of Regulations, Title 14, Section 15090, the City Council certifies that the Final EIR has been completed in compliance with the California Environmental Quality Act, Public Resources Code Section 21000, et seq. (“CEQA”) and the CEQA Guidelines for Implementation of the California Environmental Quality Act, Title 14, California Code of Regulations, Section 15000, et seq. (“CEQA Guidelines”). The City Council further certifies that it has been presented with the Final EIR and that it has reviewed and considered the information contained in the Final EIR prior to making the approvals set forth below in Section III. The City Council further certifies that the Final EIR reflects the independent judgment and analysis of the City.

II. FINDINGS

The City Council is certifying the Final EIR, and approving and adopting the Findings, Statement of Overriding Considerations, and Mitigation Monitoring and Reporting Program (collectively, “the Findings”) for the entirety of the actions described in these Findings and in the Final EIR. There may be actions undertaken by other state and local agencies (referred to as “responsible agencies” under CEQA). Because the City is the lead agency for the proposed project, the Final EIR is intended to be the basis for compliance with CEQA for each of the possible discretionary actions by other state and local agencies to carry out the proposed project. In this action, the City Council is approving the proposed project, including the site plans and designs of the warehouse facility.

Having received, reviewed and considered the Final EIR and other information in the administrative record, the City Council hereby adopts the following Findings, Statement of Overriding Considerations, and Mitigation Monitoring and Reporting Program in compliance

with CEQA and the CEQA Guidelines. The City Council certifies that its Findings are based on an assessment of all viewpoints, including all comments received up to the date of adoption of these Findings, concerning the environmental impacts identified and analyzed in the Final EIR. The City Council adopts these Findings, Mitigation Monitoring Program, and Statement of Overriding Considerations in conjunction with its approval as set forth in Section III, below.

A. Environmental Review Process

1. Preparation of the EIR

On November 21, 2008, the City issued a Notice of Preparation (“NOP”) announcing the preparation of the Draft EIR for the proposed project and describing the proposed scope of study in the Draft EIR. The Initial Study was included for review along with the NOP. The NOP and Initial Study were circulated to responsible agencies and interested groups and individuals for a 30-day review period ending December 22, 2008. In addition, in order to solicit further input regarding the scope and content of the environmental analysis to be included in the Draft EIR, a public scoping meeting was held on December 3, 2008, as part of a regularly scheduled Planning Commission meeting located at the Perris City Hall.

The City published the Draft EIR on March 24, 2010 and circulated it for public review and comment for a 45-day period that ended on May 7, 2010. The City circulated the Draft EIR by: (1) submitting 15 copies of the Draft EIR to the State Office of Planning and Research (State Clearinghouse) along with the required Notice of Completion; (2) submitting copies of the Draft EIR to the 10 agencies that responded to the NOP; (3) making a copy available at the Cesar Chavez Public Library in the City of Perris; (4) making copies available for review and copying at the City of Perris Development Services Department; (5) publishing a Notice of Availability of the Draft EIR in the *Sentinel Weekly News*; and (6) mailing the Notice of Availability to applicable Federal, state, and regional agencies, nearby cities, and all property owners within a 300-foot radius of the project site and agricultural preserve property owners within a 1-mile radius of the site.

A total of nine letters were received from Federal, state, and local agencies, and Native American groups during the public comment period. The Final EIR contains all of the comment letters received during the public comment period, together with written responses to the comments that were prepared in accordance with CEQA and the CEQA Guidelines. The City Council certifies that it has reviewed the comments received and responses thereto and finds that the Final EIR provides adequate, good-faith, and reasoned responses to the comments.

2. Absence of Significant New Information

CEQA Guidelines Section 15088.5 requires a lead agency to recirculate an EIR for further review and comment when significant new information is added to the EIR after public notice is given of the availability of the draft EIR but before certification. Significant new information may include: (i) changes to the proposed project; (ii) changes in the environmental setting; or

(iii) additional data or other information. Section 15088.5 further provides that “[n]ew information added to an EIR is not ‘significant’ unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement.”

Comments received during the public review did result in minor changes to the text of the Draft EIR. The comments did not provide significant new information and the text changes did not change the conclusions presented in the Draft EIR. In addition, all feasible Mitigation Measures identified in the Final EIR are included in the Mitigation Monitoring Program. Therefore, having reviewed the information contained in the Draft and Final EIR, and in the administrative record as well as the requirements under CEQA Guidelines §15088.5, and interpretive judicial authority regarding recirculation of draft EIRs, the City Council hereby finds that no new significant information was added to the EIR following public review and thus, recirculation of the Draft EIR is not required under CEQA.

B. Impacts and Mitigation Measures of the Project

The following section summarizes the environmental impacts of the project identified in the Final EIR, and provides findings as to those impacts, as required by CEQA and the CEQA Guidelines. The findings set forth below are made and adopted by the City Council as its findings under CEQA. The findings provide the written analysis and conclusions of the City Council regarding the environmental impacts of the proposed project, mitigation measures, alternatives to the proposed project, and Statement of Overriding Considerations that, in the City Council’s view, justify approval of the proposed project despite its unavoidable significant environmental impacts.

These findings summarize the environmental findings in the Final EIR concerning project impacts before and after mitigation and do not repeat the full discussions of environmental impacts contained in the Final EIR. Instead, they provide a brief description of the impacts, describe the applicable mitigation measures that are adopted by the City Council, and state the recommended findings on the significance of each impact after imposition of the adopted mitigation measures. A full explanation of these environmental findings and conclusions is set forth in the Final EIR. These findings hereby incorporate by reference the analyses in the Initial Study and Final EIR supporting the Final EIR’s findings and conclusions, and in making these findings, the City Council ratifies, adopts and incorporates the evidence, analysis, explanation, findings, responses to comments, and conclusions of the Final EIR except where they are specifically modified by these Findings.

In adopting these findings, the City Council intends to adopt each of the mitigation measures recommended in the Final EIR and listed in the Mitigation Monitoring and Reporting Program. In the comments on the Draft EIR, a number of measures were suggested by various commentors as recommended additional mitigation measures. With respect to the measures that were recommended in the comment letters, and not incorporated into the Final EIR, the Response to

Comments section in the Final EIR explains why these additional or modified mitigation measures are not considered to be applicable or feasible for the proposed project. The City Council hereby adopts and incorporates by reference the reasons stated in the Response to Comments contained in the Final EIR as its grounds for rejecting adoption of these recommended mitigation measures.

1. Agricultural Resources

- a. *Potential Impact: Convert prime farmland, unique farmland or farmland of statewide importance as shown on the maps prepared pursuant to farmland mapping and monitoring program of the California resource agency, to non-agricultural use.*

FINDING: The City Council finds that the proposed project will have a significant and unavoidable impact with regard to the conversion of land that is currently designated by the California Department of Agriculture as Prime Farmland and Farmland of Local Importance to a site that is developed with industrial land uses. For the reasons stated in the Final EIR, the City Council also finds that no feasible mitigation exists to reduce or eliminate this impact. The City Council finds this significant impact to be acceptable since the benefits of the project outweigh this and other unavoidable environmental impacts for the reasons set forth in Section II.G of these Findings.

- b. *Potential Impact: Conflict with existing agricultural use or a Williamson Act contract.*

FINDING: Although the project site is currently zoned A1 (Light Agriculture), a Change of Zone to LI (Light industrial) is a requested action of the project. The LI zoning designation for the site will then be consistent with the General Plan Land Use Plan designation for the site. For the reasons stated in the Final EIR, the City Council finds that the potential for the project to conflict with existing agricultural uses is expected to be limited and less than significant. One of the two parcels at the project site is currently subject to an active Williamson Act contract. However, the City Council finds that the requested Agricultural Diminishment will reduce this impact to a less than significant level. No mitigation is required.

- c. *Potential Impact: Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural uses.*

FINDING: The City Council finds that the project area is currently undergoing conversions from agricultural uses to residential, commercial, and industrial uses as envisioned in the Perris General Plan. The City Council also finds that this conversion will occur with or without the proposed project and that proposed project will not increase the likelihood of nearby lands currently used for agriculture to convert to non-agricultural uses and that any impacts to other agricultural lands will be less than significant. No mitigation is required.

2. Airport Hazards

- a. *Potential Impact: Result in a safety hazard for people residing or working in the project area where located within an airport land use plan or, where such a plan has not been adopted, within two miles of public airport or public use airport.*

Mitigation Measures

MM Airport 1: All street lights and other outdoor lighting shall be hooded or shielded to prevent either the spillage of lumens or reflection into the sky or above the horizontal plane.

MM Airport 2: The following notice shall be provided to all potential purchasers and tenants:

“This property is presently located in the vicinity of an airport, within what is known as an airport influence area. For that reason, the property may be subject to some of the annoyances or inconveniences associated with proximity to airport operations (for example, noise, vibration, or odors). Individual sensitivities to those annoyances can vary from person to person. You may wish to consider what airport annoyances, if any, are associated with the property before you complete your purchase and determine whether they are acceptable to you. Business & Profession Code 11010 12(A)”

MM Airport 3: The following uses shall be prohibited:

- (a) Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final

approach toward a landing at an airport, other than an FAA-approved navigational signal light or visual approach slope indicator.

(b) Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an aircraft engaged in a straight final approach towards a landing at an airport.

(c) Any use which would generate smoke or water vapor or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area.

(d) Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.

MM Airport 4: Prior to recordation of a final map, issuance of building permits, or conveyance to an entity exempt from the Subdivision Map Act, whichever occurs first, the landowner shall convey an aviation easement to March Air Reserve Base.

FINDING: The City Council finds that implementation of mitigation measures MM Airport 1 through MM Airport 4, which are hereby adopted and incorporated into the project, will ensure that all potential direct airport hazard impacts of the proposed project will be reduced to a less than significant level.

3. Air Quality

- a. *Potential Impact: Conflict with or obstruct implementation of the applicable air quality plan.*

FINDING: For the reasons stated in the Final EIR, the City Council finds that the proposed project will not conflict with or obstruct implementation of the applicable air quality plan and that potential impacts would be less than significant.

- b. *Potential Impact: Violate any air quality standard or contribute substantially to an existing or projected air quality violation.*

Mitigation Measures

MM Air 1: Electricity from permanent or temporary power poles shall be used instead of temporary diesel- or gasoline- powered generators to reduce the associated emissions.

MM Air 2: All retail/commercial/industrial land uses shall apply paints using either high volume low pressure (HVLP) spray equipment with a minimum transfer efficiency of at least 50% or other application techniques with equivalent or higher transfer efficiency.

MM Air 3: Prior to issuance of the grading permit(s), the applicant(s) shall submit a traffic control plan that will describe in detail safe detours and provide temporary traffic control during construction activities. To reduce traffic congestion, and therefore NOX, the plan shall include, as necessary, appropriate, and practicable, the following: temporary traffic controls such as a flag person during all phases of construction to maintain smooth traffic flow, dedicated turn lanes for movement of construction trucks and equipment on- and off-site, scheduling of construction activities that affect traffic flow on the arterial system to off-peak hour, rerouting of construction trucks away from congested streets or sensitive receptors, and/or signal synchronization to improve traffic flow.

MM Air 4: During construction, all vehicles and equipment shall be properly maintained according to manufacturers' specifications at an offsite location, which includes proper tuning and timing of engines. Equipment maintenance records and equipment design specification data sheets shall be kept on site during construction.

MM Air 5: The project developer shall require by contract specification that construction equipment used for construction meets or exceeds Tier 3 standards. Alternatively, all construction equipment shall be equipped with CARB-verified oxidation catalysts, diesel particulate traps or other verified or certified retrofit technologies with the greatest control efficiency for the specific category of equipment. Contract specifications shall be included in project construction documents, which shall be reviewed by the City of Perris prior to issuance of a grading permit.

MM Air 6: All construction vehicles shall be prohibited from idling in excess of five minutes, both on site and off site.

MM Air 7: Construction parking shall be configured to minimize traffic interference.

MM Air 8: To reduce VOC emissions associated with architectural coating, the project designer and contractor shall reduce the use of paints and solvents by utilizing pre-coated materials (e.g. bathroom stall dividers, metal awnings), materials that do not require painting, and require coatings and solvents with a VOC content lower than required under Rule 1113 to be utilized. The construction contractor shall be required to utilize “Super-Compliant” VOC paints, which are defined in SCAQMD’s Rule 1113. Construction specifications shall be included in the building specifications that assure these requirements are implemented. The specifications shall be reviewed by the City of Perris’ Building Division for compliance with this mitigation measure prior to issuance of a building permit.

MM Air 9: The developer shall comply with SCAQMD Rule 403. The developer shall provide the City of Perris with the SCAQMD-approved dust control plan, or other sufficient proof of compliance with Rule 403, prior to grading permit issuance.

MM Air 10: All vehicles shall be prohibited from idling in excess of five minutes.

MM Air 11: Loading bays shall be equipped with electrification, and/or auxiliary power units.

MM Air 12: Roads and parking areas shall be paved.

MM Air 13: The project shall post contact information outside the facility for the public to call if a specific air quality issue arises.

MM Air 14: In order to promote alternative fuels, and help support “clean” truck fleets, the developer/successor-in-interest shall provide building occupants and businesses with information related to SCAQMD’s Carl Moyer Program, or other state programs that provide funding for cleaner than required heavy-duty engines and emission control devices, such as 2007 or newer model year or 2010 compliant vehicles.

MM Air 14a: Service equipment at the facility will be either low-emission propane powered or electric (i.e., forklifts).

MM Air 15: The project shall be, at a minimum, required to increase building energy performance 14 percent beyond Title 24, and reduce water use by 20 percent. Prior to issuance of any building permits, building plans shall include proof of these reductions.

MM Air 16: The project shall be required to use recycled materials for at least 15 percent of construction materials. Regional materials that are extracted, processed, and manufactured regionally will also be required to account for 10 percent of the project.

MM Air 17: The project shall be required to recycle and/or salvage at least 75 percent of non-hazardous construction and demolition debris by weight and volume.

MM Air 18: In order to reduce energy consumption from the proposed project development, applicable plans (e.g., electrical plans, improvement maps, etc.) submitted to the City shall include the installation of energy-efficient street lighting throughout the project site. These plans shall be reviewed and approved by the applicable City Department (e.g., Building Division or Department of Public Works/Engineering) prior to conveyance of applicable streets.

FINDING: The City Council finds that the regional emissions of volatile organic compounds (VOC), oxides of nitrogen (NOx), suspended particulate matter (PM-10) and fine particulate matter (PM-2.5) generated by the short-term project-related construction activities of the proposed project will exceed the thresholds of significance recommended by the South Coast Air Quality Management District (SCAQMD). The City Council finds that the regional operational emissions of VOC and NOx will also exceed the thresholds of significance recommended by the SCAQMD. The localized concentrations of emissions generated by the project during both construction and operation will not exceed recommended thresholds of significance and would not be significant. Mitigation measures MM Air 1 through MM Air 9, which are hereby adopted and incorporated into the project, will reduce construction-related impacts to the maximum extent feasible and mitigation measures MM Air 10 through MM Air 18, which are hereby adopted and incorporated into the project, will reduce operational emissions to the maximum extent feasible, but no feasible mitigation exists to reduce the emissions below the

SCAQMD's recommended thresholds. The City Council finds this significant impact to be acceptable since the benefits of the project outweigh this and other unavoidable environmental impacts for the reasons set forth in Section II.G of these Findings.

- c. *Potential Impact: Result in a cumulatively considerable increase of a criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).*

Mitigation Measures

Mitigation measures MM Air 1 through MM Air 18, above, are proposed to reduce this impact.

FINDING: The City Council finds that the significant project-specific regional emissions of VOC, NOx, PM-10, and PM-2.5 generated by short-term project-related construction activities, and the significant project-specific regional operational emissions of VOC and NOx will contribute to a cumulatively considerable net increase in ozone and particulate matter. The City Council also finds that the contribution of the project emissions to the state-wide cumulative greenhouse gas impact will be considerable. Implementation of mitigation measures MM Air 1 through MM Air 9, which are hereby adopted and incorporated into the project, will reduce construction-related impacts to the maximum extent feasible and that mitigation measures MM Air 10 through MM Air 18, which are hereby adopted and incorporated into the project, will reduce operational emissions to the maximum extent feasible, but no feasible mitigation exists to reduce this impact to a less than significant level. The City Council finds this significant impact to be acceptable since the benefits of the project outweigh this and other unavoidable environmental impacts for the reasons set forth in Section II.G of these Findings.

- d. *Potential Impact: Expose sensitive receptors to substantial pollutant concentrations.*

FINDING: For the reasons stated in the Final EIR, the City Council finds that the proposed project will not expose sensitive receptors to toxic air contaminants or cancer risks that exceed the recommended thresholds of significance recommended by the

SCAQMD and that potential impacts will be less than significant. No mitigation is required.

- e. *Potential Impact: Create objectionable odors affecting a substantial number of people.*

FINDING: For the reasons stated in the Final EIR, the City Council finds that the proposed project will not create objectionable odors during either construction or operational that will affect existing sensitive receptors and that potential impacts will be less than significant. No mitigation is required.

4. *Biological Resources*

- a. *Potential Impact: 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.*

Mitigation Measures

MM Bio 1: A pre-construction survey for resident burrowing owls will be conducted by a qualified biologist no more than 30 days prior to commencement of grading and construction activities within those portions of the project site containing suitable burrowing owl habitat. The time lapse between surveys and site disturbance should not exceed 30 days. Additional surveys are necessary when the initial disturbance is followed by periods of inactivity or the development is phased spatially and/or temporally over the project site. Burrowing Owl surveys will be conducted in accordance with the methodologies prescribed by CDFG in their 1995 Staff Report and the Burrowing Owl Consortium in their 1993 Burrowing Owl Survey Protocol and Mitigation Guidelines.

If active nests are identified on site during the pre- construction survey, they shall be avoided or the owls actively or passively relocated. To adequately avoid active nests, no grading or heavy equipment activity shall take place within at least 250 feet of an active nest during the breeding season (February 1 through August 31), and 160 feet during the non-breeding season.

If burrowing owls occupy the site and cannot be avoided, active or passive relocation shall be used to exclude owls from their

burrows, as agreed to by the City of Perris Planning Department and the California Department of Fish and Game. Relocation shall be conducted outside the breeding season or once the young are able to leave the nest and fly. Passive relocation is the exclusion of owls from their burrows (outside the breeding season or once the young are able to leave the nest and fly) by installing one-way doors in burrow entrances. These one-way doors allow the owl to exit the burrow, but not enter it. These doors shall be left in place 48 hours to ensure owls have left the burrow. Artificial burrows shall be provided nearby. The project area shall be monitored daily for one week to confirm owl use of burrows before excavating burrows in the impact area. Burrows shall be excavated using hand tools and refilled to prevent reoccupation. Sections of flexible pipe shall be inserted into the tunnels during excavation to maintain an escape route for any animals inside the burrow. The CDFG shall be consulted prior to any active relocation to determine acceptable receiving sites available where this species has a greater chance of successful long-term relocation.

MM Bio 2: In order to avoid violation of the MBTA and California Fish and Game Code site-preparation activities (removal of trees and vegetation) shall be avoided, to the greatest extent possible, during the nesting season (generally February 1 to August 31) of potentially occurring native and migratory bird species.

If site preparation activities are proposed during the nesting/breeding season (February 1 to August 31), a pre-activity field survey shall be conducted by a qualified biologist to determine if active nests of species protected by the Migratory Bird Treaty Act (MBTA) or the California Fish and Game Code are present in the construction zone. If active nests are not located within the project area and appropriate buffer, construction may be conducted during the nesting/breeding season. However, if active nests are located during the pre-activity field survey, no grading or heavy equipment activity shall take place within at least 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected (under MBTA or California Fish and Game Code) bird nests (non-listed), or within 100 feet of sensitive or protected songbird nests until the nest is no longer active.

MM Bio 3: The purpose of the MSHCP is to conserve open space and habitat on a county-wide, cumulative basis. Potential impacts to the SKR are mitigated on a regional basis through compliance the SKR HCP mitigation fees. To address the impacts associated

with the cumulative loss of habitat for special status species, the proposed project shall be conditioned to pay the MSHCP mitigation fees as set forth under Ordinance No. 1123 and the City of Perris' Stephens' Kangaroo Rat mitigation fees as set forth under Ordinance No. 794.

FINDING: The City Council finds that compliance with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) and implementation of mitigation measures MM Bio 1 through MM Bio 3, which are hereby adopted and incorporated into the project, will ensure that all potential adverse impacts associated with biological resources will be reduced to a less than significant level.

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

FINDING: For the reasons stated in the Final EIR, the City Council finds that the proposed project will have no adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

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

FINDING: For the reasons stated in the Final EIR, the City Council finds that the proposed project will have no substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

- d. *Potential Impact: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.*

FINDING: For the reasons stated in the Final EIR, the City Council finds that the proposed project will not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. The potential impact of the proposed project will be less than significant and no mitigation is required.

5. Cultural Resources

- a. *Potential Impact: The project would cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the CEQA Guidelines.*

FINDING: For the reasons stated in the Final EIR, the City Council finds that the proposed project will not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the CEQA Guidelines. The potential impact of the proposed project will be less than significant and no mitigation is required.

- b. *Potential Impact: The project would cause a substantial adverse change in the significance of an archeological resource pursuant to Section 15064.5 of the CEQA Guidelines.*

Mitigation Measure

MM Cultural 1: Prior to grading of the project site, the project developer shall hire a qualified archaeologist to provide cultural resource monitoring services at the project site. Selection of the archaeologist shall be subject to the approval of the City of Perris Planning Manager and no grading activities shall occur at the site until the archaeologist has been approved by the City. During grading activities, the archaeologist shall monitor earthmoving activities at the project site consistent with Public Resources Code Section 21083.2(b), (c), and (d). The archaeologist shall be equipped to record and salvage cultural resources that may be unearthed during grading activities. The archaeologist shall be empowered to temporarily halt or divert grading equipment to allow recording and removal of the unearthed resources. If the archaeologist identifies resources of a prehistoric or Native American origin, a Native American observer shall be added to the monitoring program and accompany the archaeologist for the

duration of the grading phase. Any Native American resources shall be evaluated in accordance with the CEQA Guidelines and either reburied at the project site or curated at an accredited facility approved by the City of Perris. Once grading activities have ceased or the archaeologist determines that monitoring is no longer necessary, monitoring activities can be discontinued.

FINDING: The City Council finds that implementation of mitigation measure MM Cultural 1, which is hereby adopted and incorporated into the project, will ensure that the potential of the project to cause a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5 of the CEQA Guidelines are mitigated to a less than significant level.

- c. *Potential Impact: The project would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.*

Mitigation Measure

MM Cultural 2: Prior to the issuance of grading permits, a qualified paleontologist shall be retained to develop a paleontological resources monitoring and treatment plan (PRMTP) in accordance with the provisions of CEQA as well as the proposed guidelines of the Society of Vertebrate Paleontology, and shall include, but not be limited to the following:

1. The excavation of areas identified as likely to contain paleontological resources shall be monitored by a full-time qualified paleontological monitor. Monitoring shall be restricted to undisturbed subsurface areas of older alluvium, which might be present below the surface. The monitor shall be prepared to quickly salvage fossils as they are unearthed to avoid construction delays. The monitor shall also remove samples of sediments which are likely to contain the remains of small fossil invertebrates and vertebrates. The monitor must have the power to temporarily halt or divert grading equipment to allow for removal of abundant or large specimens.
2. Collected samples of sediments shall be washed to recover small invertebrate and vertebrate fossils. Recovered specimens shall be prepared so that they can be identified and permanently preserved.

3. Specimens shall be identified and curated, and placed into a repository (such as the Western Science Center or the Riverside Metropolitan Museum) with permanent curation and retrievable storage.

4. A report of findings, including an itemized inventory of recovered specimens, shall be prepared upon completion of the steps outlined above. The report shall include a discussion of the significance of all recovered specimens. The report and inventory, when submitted to the City of Perris Planning Division, will signify completion of the program to mitigate impacts to paleontological resources.

FINDING: The City Council finds that implementation of mitigation measure MM Cultural 2, which is hereby adopted and incorporated into the project, will reduce the potential of the project to directly or indirectly destroy a unique paleontological resource or site to a less than significant level.

- d. *Potential Impact: The project would disturb any human remains, including those interred outside of formal cemeteries.*

Mitigation Measure

MM Cultural 3: In the event that human remains (or remains that may be human) are discovered at the implementing development project site during grading or earthmoving, the construction contractors shall immediately stop all activities in the immediate area of the find. The project proponent shall then inform the City of Perris Planning Division immediately and retain a professional archaeologist to assess the find. In accordance with the California Health and Safety Code, the City of Perris will contact the County Coroner's office within 24 hours and the coroner will be permitted to examine the remains.

If the coroner determines that the remains are of Native American origin, the coroner will report to the Native American Heritage Commission and the Commission will identify the "Most Likely Descendent" (MLD).¹ Despite the affiliation of any Native

¹ The "Most Likely Descendent" ("MLD") is a reference used by the California Native American Heritage Commission to identify the individual or population most likely associated with any

(footnote continued to next page)

American observers at the site, the Commission's identification of the MLD will stand. The disposition of the remains will be determined in consultation with the City of Perris, the project proponent, and the MLD. The City of Perris will be responsible for the final decision, based upon input from the various stakeholders.

If the human remains are determined to be other than Native American in origin, but still of archaeological value, the remains will be recovered for analysis and subject to curation or reburial at the expense of the project proponent. If deemed appropriate, the remains will be recovered by the coroner and handled through the Coroner's Office.

Coordination with the Coroner's Office will be through the City of Perris and in consultation with the various stakeholders.

The specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. The locations will be documented by the consulting archaeologist in conjunction with the various stakeholders.

FINDING: The City Council finds that implementation of mitigation measure MM Cultural 3, which is hereby adopted and incorporated into the project, will reduce the potential of the

(footnote continued from previous page)

human remains that may be identified within a given project area. Under California Public Resources Code section 5097.98, the Native American Heritage Commission has the authority to name the MLD for any specific project and this identification is based on a report of Native American remains through the County Coroner's office. In the case of the City of Perris, the Native American Heritage Commission may identify any Luiseño descendent, but generally names the Soboba or Pechanga bands of Mission Indians (both Luiseño populations) and alternates between the two groups. The City of Perris will recognize any MLD identified by the Native American Heritage Commission without giving preference to any particular population. In cases where the Native American Heritage Commission is not tasked with the identification of a Native American representative, the City of Perris reserves the right to make an independent decision based upon the nature of the proposed project.

project to disturb human remains discovered during project construction activities to a less than significant level.

6. Geology / Soils

- a. *Potential Impact: Expose people or structures to potential substantial adverse effect, including the risk of loss, injury, or death involving strong seismic ground shaking and seismic-related ground failure, including liquefaction.*

Mitigation Measure

MM Geo 1: Fill material imported from other areas shall be tested to assess that it is suitable to be used as fill, including testing for unsafe levels of hazardous materials, prior to placement on site.

FINDING: For the reasons stated in the Final EIR, the City Council finds that the proposed project will not expose people or structures to potential substantial adverse effect, including the risk of loss, injury, or death involving strong seismic ground shaking and seismic-related ground failure, including liquefaction. The City Council also finds that implementation of mitigation measure MM Geo 1, which is hereby adopted and incorporated into the project, will ensure that soil imported to the project site is not contaminated.

7. Hazards & Hazardous Materials

- a. *Potential Impact: The project would 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.*

FINDING: For the reasons stated in the Final EIR, the City Council finds that the proposed project will not cause any significant impacts associated with hazardous materials located at or near the project site. The potential impacts of the proposed project will be less than significant and no mitigation is required.

8. Hydrology / Water Quality

- a. *Potential Impact: Violate any water quality standards or waste discharge requirements.*

FINDING: For the reasons stated in the Final EIR, the City Council finds that the proposed project will not violate any water quality standards or waste discharge requirements. The potential impact of the proposed project will be less than significant and no mitigation is required.

- b. *Potential Impact: Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.*

FINDING: For the reasons stated in the Final EIR, the City Council finds that the proposed project will not substantially impact groundwater recharge within the Eastern Municipal Water District's Perris North groundwater subbasin. The potential impact of the proposed project will be less than significant and no mitigation is required.

- c. *Potential Impact: Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.*

FINDING: For the reasons stated in the Final EIR, the City Council finds that the proposed project will not create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff. The potential impact of the proposed project will be less than significant and no mitigation is required.

- d. *Potential Impact: Substantially degrade water quality.*

FINDING: For the reasons stated in the Final EIR, the City Council finds that the proposed project will not substantially degrade water quality. The potential impact of the proposed project will be less than significant and no mitigation is required.

- e. *Potential Impact: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site.*

FINDING: For the reasons stated in the Final EIR, the City Council finds that the proposed project will not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site. The potential impact of the proposed project will be less than significant and no mitigation is required.

- f. *Potential Impact: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.*

FINDING: For the reasons stated in the Final EIR, the City Council finds that the proposed project will not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. The potential impact of the proposed project will be less than significant and no mitigation is required.

9. Land Use / Planning

- a. *Potential Impact: Violate any water quality standards or waste discharge requirements.*

FINDING: For the reasons stated in the Final EIR, the City Council finds that the proposed project will not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinances) adopted for the purpose of avoiding or mitigating an environmental effect. The potential impact of the proposed project will be less than significant and no mitigation is required.

10. Noise

- a. *Potential Impact: Result in exposure of people to severe noise levels in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies.*

FINDING: For the reasons stated in the Final EIR, the City Council finds that the proposed project will not result in exposure of people to severe noise levels in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies. The potential impact of the proposed project will be less than significant and no mitigation is required.

- b. *Potential Impact: Result in the exposure of persons to or generation of excessive ground-born vibration or ground-born noise levels.*

FINDING: For the reasons stated in the Final EIR, the City Council finds that the proposed project will not result in the exposure of persons to or generation of excessive ground-born vibration or ground-born noise levels. The potential impact of the proposed project will be less than significant and no mitigation is required.

- c. *Potential Impact: Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.*

FINDING: For the reasons stated in the Final EIR, the City Council finds that the proposed project will not result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. The potential impact of the proposed project will be less than significant and no mitigation is required.

- d. *Potential Impact: Result in substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.*

FINDING: For the reasons stated in the Final EIR, the City Council finds that the proposed project will not result in substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. The potential impact of the proposed project will be less than significant and no mitigation is required.

- e. *Potential Impact: Result in exposure of people residing or working in the project area to excessive noise levels from airport noise.*

FINDING: For the reasons stated in the Final EIR, the City Council finds that the proposed project will not result in exposure of people residing or working in the project area to excessive noise levels from airport noise. The potential impact of the proposed project will be less than significant and no mitigation is required.

11. Solid Waste

- a. *Potential Impact: Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs.*

FINDING: For the reasons stated in the Final EIR, the City Council finds that the existing landfills that serve the City of Perris will have sufficient capacity to accommodate the solid waste generated during construction and operation of the proposed project. The potential impact of the proposed project will be less than significant and no mitigation is required.

12. Transportation / Traffic

- a. *Potential Impact: Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system, or exceed, either individually or cumulatively, a level of service standard established by the city/county congestion management agency for designated roads or highways.*

Mitigation Measures

MM Trans 1: Indian Avenue shall be improved to its full street right-of-way to the center lane, plus 15 feet where it fronts the project site.

MM Trans 2: Indian Avenue shall be constructed as a 42- foot pilot road from the northern edge of the project site to Harley Knox Boulevard.

MM Trans 3: Webster Avenue shall be improved to its full street right-of-way to the center lane, plus 15 feet where it fronts the project site.

MM Trans 4: Rider Street shall be improved to its full street right-of-way to the center lane, plus 15 feet where it fronts the project site, eastward to Perris Boulevard.

MM Trans 5: Sight distance at the project entrance roadway shall be reviewed with respect to standard City of Perris sight distance standards at the time of preparation of final grading, landscape and street improvement plans.

MM Trans 6: The proposed project shall participate in the phased construction of off-site traffic signals through payment of the project's fair share of traffic signal mitigation fees.

MM Trans 7: Signing/striping shall be implemented in conjunction with detailed construction plans for the project site.

MM Trans 8: Construct the intersection of Indian Avenue and Project Driveway to include the following geometrics:

Northbound: One left turn lane. One shared through and right turn lane. Stop controlled.

Southbound: One left turn lane. One shared through and right turn lane. Stop controlled.

Eastbound: One left turn lane. One shared through and right turn lane. Stop controlled.

Westbound: One left turn lane. One shared through and right turn lane. Stop controlled.

MM Trans 10: Construct the intersection of Car Driveway East and Rider Street to restrict movement to right-in and right-out only from the driveway with the following geometrics:

Northbound: Not Applicable.

Southbound: One right turn lane. Stop controlled.

Eastbound: One through lane.

Westbound: One shared through and right turn lane.

MM Trans 11: Construct the intersection of Truck Driveway East and Rider Street to include the following geometrics:

Northbound: Not Applicable.

Southbound: One shared left turn and right turn lane. Stop controlled.

Eastbound: One left turn lane. One through lane.

Westbound: One shared through and right turn lane.

MM Trans 12: Construct the intersection of Truck Driveway West and Rider Street to include the following geometrics:

Northbound: Not Applicable.

Southbound: One shared left turn and right turn lane. Stop controlled.

Eastbound: One left turn lane. One through lane.

Westbound: One shared through and right turn lane.

MM Trans 13: Construct the intersection of Car Driveway West and Rider Street to include the following geometrics:

Northbound: Not Applicable.

Southbound: One shared left turn right turn lane. Stop controlled.

Eastbound: One shared left turn through lane.

Westbound: One shared through and right turn lane.

MM Trans 14: Construct the intersection of Webster Avenue and Rider Street to include the following geometrics:

Northbound: Not Applicable.

Southbound: One left turn lane. One right turn lane. Stop controlled.

Eastbound: One left turn lane. One through lane.

Westbound: One shared through and right turn lane.

MM Trans 15: Construct the intersection of Webster Avenue and Project Driveway to include the following geometrics:

Northbound: One shared through and right turn lane.

Southbound: One shared left turn and through lane.

Eastbound: Not Applicable.

Westbound: One shared left turn and right turn lane. Stop controlled.

MM Trans 16: The project shall participate in the cost of off-site improvements through payment of the fair share mitigation fees. These fees shall be collected and utilized as needed by the City of Perris to construct the improvements necessary to maintain the required level of service and build roads to the general plan build-out level.

FINDING: The City Council finds that implementation of mitigation measures MM Trans 1 through MM Trans 16, which are

hereby adopted and incorporated into the project, will ensure that the potential of the traffic generated by the project to exceed the capacity of the local roadway system or the City's level of service standards is mitigated to a less than significant level.

- b. *Potential Impact: The project would conflict with adopted policies, plans or programs supporting alternative transportation.*

FINDING: For the reasons stated in the Final EIR, the City Council finds that the project will not conflict with the City's adopted policies, plans, or programs supporting alternative modes of transportation. The potential impact of the proposed project will be less than significant and no mitigation is required.

13. *Water and Sewer*

- a. *Potential Impact: Require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects.*

FINDING: For the reasons stated in the Final EIR, the City Council finds that the potential impacts of the proposed project related to water treatment facilities will be less than significant and no mitigation is required.

- b. *Potential Impact: Have insufficient water supplies available to serve the project from existing entitlements and resources, or require new or expanded entitlements.*

FINDING: For the reasons stated in the Final EIR, the City Council finds that adequate water supplies are available from the Eastern Municipal Water District to serve the proposed project. The impact of the proposed project related to water supplies will be less than significant and no mitigation is required.

- c. *Potential Impact: Require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, the construction of which would cause significant environmental effects.*

FINDING: For the reasons stated in the Final EIR, the City Council finds that the proposed project will not require the development of new wastewater treatment facilities and the impact

of the proposed project related to the construction of new wastewater infrastructure will be less than significant. No mitigation is required.

- d. *Potential Impact: Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.*

FINDING: For the reasons stated in the Final EIR, the City Council finds that adequate wastewater capacity is available from the Eastern Municipal Water District to accommodate the proposed project. The impact of the proposed project related to wastewater treatment capacity will be less than significant and no mitigation is required.

C. Effects Not Found to be Significant

Certain environmental impacts were determined to be “effects not found to be significant” in the Draft EIR based upon the analysis provided in the Initial Study for the proposed project. Although not required by CEQA, these impacts were summarized in the Draft EIR, and the conclusions of the Initial Study that these impacts were less-than-significant were affirmed.

FINDING: The City Council finds that, based upon the substantial evidence contained in the Initial Study and Draft EIR, that those impacts determined to be “effects not found to be significant” are less than significant and no analysis in the EIR or mitigation was required.

D. Other CEQA Considerations

1. *Cumulative Impacts.*

a. *Cumulative Impacts Found to be Less-than-Significant.*

The Final EIR contains analyses of the cumulative impacts in which the proposed project could result. As per the analyses contained in the Final EIR, the majority of these cumulative impacts were determined to be less than significant.

FINDING: The City Council finds that implementation of the proposed project would result in less than significant cumulative impacts with regard to some aspects of agricultural resources (agricultural use and Williamson Act contract, and changes of other properties from farmland to non-agricultural uses); airport hazards, some aspects of air quality (air quality management plan consistency, exposing sensitive receptors to

substantial pollutant concentrations, and odors); biological resources, cultural resources; geology / soils; hazards & hazardous materials; hydrology / water quality; land use / planning; noise; solid waste; transportation / traffic; and water and sewer, after implementation of the applicable mitigation measures specified for each Impact in Section II.B. of these Findings. Consequently, no further mitigation is necessary.

b. Cumulative Impacts Found to be Significant and Unavoidable.

The Draft EIR contains analyses of the cumulative impacts in which the proposed project could result. As per the analyses contained in the Final EIR, impacts relating to one aspect of agricultural resources (the conversion of land that is currently designated by the California Department of Agriculture as Prime Farmland and Farmland of Local Importance to a site that is developed with industrial land uses) and two aspects of air quality (violating and air quality standard and resulting 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) are considered to be cumulatively significant and unavoidable.

FINDINGS: The City Council finds that implementation of the proposed project would result in significant and unavoidable cumulative air quality impacts with regard to the conversion of land that is currently designated as Prime Farmland, the generation of regional emissions air pollutant emissions generated project construction and operational activities, and the greenhouse gas emissions by project construction and operational activities. Implementation of the applicable mitigation measures specified for each Impact in Section II.B of these Findings will reduce the degree of significance of these impacts, but they shall nevertheless remain cumulatively significant and unavoidable. The City Council finds these significant and unavoidable cumulative impacts to be acceptable for the reasons set forth in Section II.G of these Findings.

2. Growth Inducing Impacts

CEQA Guidelines Section 15126 requires consideration of the potential growth inducing impact of proposed projects, including the ways in which “the proposed project could foster economic and population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment ... and the characteristic of some projects which may encourage or facilitate other activities that could significantly affect the environment, either individually or cumulatively.” As stated in the Final EIR, the proposed project itself is not increasing the number of parcels or service to areas not already planned to be served; the project is implementing the City’s General Plan and by adopting their General Plan, the City has planned for the conversion of the project site to urban development. The proposed project requires the construction of minimal off-site facilities in order to connect to existing waterlines and existing sewer facilities, but the Eastern Municipal Water District’s existing water and sewer facilities would support development within the vicinity of the project, with or without the proposed project. The proposed project is consistent with regional growth forecasts and regional jobs/housing balance projections, and implementation of the proposed project will help meet the

projected jobs/housing balance of the City of Perris. New employees of the project are also expected to have a secondary effect of expanding the size of local markets and inducing additional economic activity in the area.

FINDING: The City Council finds that implementation of the proposed project will not result in growth inducing impacts, as the proposed project will not result in the urbanization of land in a remote location (i.e., “leapfrog development”), will not result in the construction of additional housing, and will not induce substantial population growth in the region.

3. *Significant Irreversible Environmental Effects*

CEQA Guidelines §15126.2(c) indicates that the “uses of nonrenewable resources during the initial and continued phases of a project may be irreversible since a large commitment of resources makes removal or non-use thereafter unlikely.” As stated in the Final EIR, implementation of the proposed project would irreversibly commit the project site to development of light industrial uses, result in a long-term, irreversible change in the visual character of the project site, and transform the agricultural character of the site into an urban development. These changes to the visual environment are consistent in keeping with the City’s plans to convert agricultural land to urban development.

Construction and operational activities will result in the use of non-renewable resources including building materials and fossil fuels. These resources and the resources used in their production are readily available for use by the project.

Project-specific impacts related to agricultural resources and air quality would be significant and immitigable at the project level. These issues were also found to have significant cumulative impacts. These impacts would require adoption of a Statement of Overriding Considerations.

Then proposed project would not expose structures or persons to significant risks associated with damage from accidents.

FINDING: Implementation of the proposed project will not result in a significant irreversible commitment of resources or potential environmental damage from accidents. The project will, however, result in significant and unavoidable impacts related to agricultural resources and air quality. The City Council finds these significant and unavoidable cumulative impacts to be acceptable for the reasons set forth in Section II.G of these Findings.

E. Mitigation Monitoring and Reporting Program

Public Resources Code §21081.6 and CEQA Guidelines §15091(d) require the lead agency approving a project to adopt a Mitigation Monitoring Program for the changes to the proposed project that it has adopted or made a condition of project approval in order to ensure compliance

during project implementation. The Mitigation Monitoring and Reporting Program adopted by the City Council requires the City to monitor the mitigation measures imposed on the project by the Final EIR. The Mitigation Monitoring and Reporting Program includes all of the mitigation measures identified in the Final EIR and has been designed to ensure compliance during implementation of the project.

FINDING: The City Council finds that the impacts of the proposed project have been mitigated to the extent feasible by the mitigation measures identified in the Final EIR and in the Mitigation Monitoring and Reporting Program. The City Council adopts the Mitigation Monitoring and Reporting Program that accompanies the Final EIR for the proposed project. The Mitigation Monitoring and Reporting Program designates responsibility and anticipated timing for the implementation of mitigation within the jurisdiction of the City. Implementation of the mitigation measures specified in the Final EIR and the Mitigation Monitoring and Reporting Program will be accomplished through administrative controls over project implementation, and monitoring and enforcement of these measures will be accomplished through verification by appropriate City personnel. The City reserves the right to allow the Planning Manager to make administrative amendments and/or substitutions of mitigation measures if, in the exercise of discretion of the City Planning Manager, it is determined that the amended or substituted mitigation measure will mitigate the identified potential environmental impact to at least the same degree as the original mitigation measure, or would attain an adopted performance standard for mitigation, and where the amendment or substitution would not result in a new significant impact on the environment which cannot be mitigated.

F. Alternatives

The Final EIR considered a reasonable range of potential alternatives to the proposed project. In compliance with CEQA and the CEQA Guidelines, the Final EIR includes an analysis of a No Project Alternative and discusses the environmentally superior alternative. The analysis examined the feasibility of each alternative, the environmental impacts of each alternative, and the ability of each alternative to meet the Project Objectives identified in Section 3.0 of the Draft EIR.

The City Council certifies that it has independently reviewed and considered the information on alternatives provided in the Final EIR and the administrative record, and finds that all the alternatives are infeasible or undesirable in comparison to the proposed project for the reasons set forth below.

1. *Project Objectives*

The City Council finds that the Project Objectives for the proposed project are as described in Section 3.0 of the Draft EIR. These specific Project Objectives are to:

- Establish a modern, economically competitive distribution center to strengthen the City's economic viability by providing jobs;
- Implement the City of Perris General Plan land use designation of Light Industrial;
- Establish a modern, economically competitive distribution center to provide an expanded and diversified economic base for the city;
- Establish a modern, economically competitive distribution center near major transportation routes including freeways;
- Generate local tax revenue for the City of Perris and stimulate economic growth surrounding the project area; and
- Enhance image of the City of Perris by improving vacant property with a modern distribution center which is landscaped and provides improved roadways.

2. *No Project - Existing Land Use Alternative*

In accordance with CEQA and the CEQA Guidelines, the Final EIR evaluates the "no project" alternative," which compares the impacts of approving the proposed project with the impacts of not approving it. Since the proposed project is consistent with the existing City of Perris General Plan Land Use Map land use designation, the No Project Alternative analyzed in the Final EIR is the continued use of the site for passive agriculture and vacant uses.

Relationship to Project Objectives

The No Project Alternative would not create any of the potentially significant impacts of the proposed project, but also would not fulfill any of the Project Objectives.

FINDING: Pursuant to Public Resources Code §21081(a)(3) and CEQA Guidelines §15091(a)(3), the City Council finds that the No Project Alternative is rejected because it would not fulfill any of the Project Objectives, as described above.

3. *Reduced Square Footage Alternative*

The Reduced Square Footage alternative will reduce the square footage of proposed building by 20 percent. Although the overall square footage of the project could be reduced, not all aspects of development would be reduced equally as a result. Implementation of this alternative would result in a volume reduction of project-generated traffic. The reduced traffic would result in slightly lesser noise impacts, by reducing the amount of vehicle traffic noise, and reduced air quality impacts. However, air quality impacts will not be sufficiently reduced to eliminate significant impact findings. Impacts related to biological, cultural, geology, hazards, hydrology, land use, and utilities (water, sewer, and solid waste) would essentially stay the same as the proposed project.

Relationship to Project Objectives

Development of the Reduced Square Footage Alternative would partially meet the Project Objectives but will not be as economically competitive and more likely not as economically viable for the applicant to construct and operate.

FINDING: Pursuant to Public Resources Code §21081(a)(3) and CEQA Guidelines §15091(a)(3), the City Council finds that the Reduced Square Footage alternative is rejected because it cannot fully attain all Project Objectives, cannot be as economically viable as the proposed project, and is likely not as economically viable for the applicant to construct and operate.

4. *Business Park Alternative*

The Business Park alternative would allow for business park uses that are allowed under the current general Plan Land Use Map designation for the project site. This alternative would allow for the development of up to 811,840 square feet of business park uses. Although the amount of building space would be less than the proposed project, the business park uses would generate nearly seven times the amount of daily traffic as the proposed project. Impacts related to agricultural resources, airport hazards, biological resources, cultural resources, geology / soils, hazards & hazardous materials, hydrology / water quality, land use / planning, solid waste, and water and sewer would be the same as the proposed project. However, impacts to air quality, noise, and transportation / traffic would be substantially greater than the proposed project.

Relationship to Project Objectives

Development of the Business Park alternative would partially meet the Project Objectives but will generate substantially greater impacts to air quality, noise, and transportation / traffic.

FINDING: Pursuant to Public Resources Code §21081(a)(3) and CEQA Guidelines §15091(a)(3), the City Council finds that the Business Park alternative is rejected because it will not reduce any impacts of the proposed project and will generate substantially greater impacts to air quality, noise, and transportation / traffic.

5. *Environmentally Superior Alternative*

The CEQA Guidelines require that the environmentally superior alternative (other than the No Project alternative) be identified among the project and other alternatives considered in an EIR. Of the alternatives analyzed in the Final EIR, the Reduced Square Footage alternative is the most successful at reducing the environmental impacts of the proposed project. However, the alternatives analysis notes that the reductions in environmental effects under the Reduced Square Footage alternative is of limited benefit when compared to full and efficient use of available industrial properties, additional distribution warehousing facilities, tax generation, and employment opportunities which would be realized under the project. In this regard, the project, more so than the Reduced Square Footage alternative, responds to, and supports the City's General Plan vision for development of the subject site.

FINDING: The City Council hereby finds that the Reduced Square Footage alternative is considered the environmentally superior alternative based on the analysis of the Final EIR. However, the Reduced Square Footage alternative will not be as economically competitive and more likely not as economically viable for the applicant to propose. The reduction in the number of vehicles makes this alternative environmentally superior over the proposed project, but it will result in less revenue and thus less tax revenue and fewer jobs to the City.

G. Statement of Overriding Considerations

1. *Impacts That Remain Significant*

As discussed above, the City Council has found that the following impacts of the proposed project remain significant, either in whole or in part, after adoption and implementation of all the mitigation measures provided in the Final EIR:

- a. Conversion of land that is currently designated by the California Department of Agriculture as Prime Farmland and Farmland of Local Importance to a site that is developed with industrial land uses.
- b. Regional emissions of VOC, NO_x, PM-10, and PM-2.5 generated by short-term project-related construction activities will exceed the thresholds of significance recommended by the SCAQMD.
- c. Regional operational emissions of VOC and NO_x will exceed the thresholds of significance recommended by the SCAQMD.
- d. Cumulatively considerable regional net increase of VOC, NO_x, PM-10, and PM-2.5 generated by short-term project-related construction within a regional non-attainment area.
- e. Cumulatively considerable regional net increase of VOC and NO_x generated by operational activities within a regional non-attainment area.
- f. Cumulatively considerable contribution of greenhouse gas emissions to the state-wide cumulative impact.

2. *Overriding Considerations*

In accordance with CEQA Guidelines Section 15093, the City Council has, in determining whether or not to approve the project, balanced the economic, social, technological and other benefits of the proposed project against its unavoidable environmental risks, and has found that benefits of the proposed project outweigh the significant adverse environmental effects that are not mitigated to less than significant levels, for the reasons set forth below. This Statement of

Overriding Considerations is based on the review of the Final EIR and other information in the administrative record by the City Council. The City Council hereby finds that each of the reasons stated below constitutes a separate and independent basis of justification for the Statement of Overriding Considerations, and each is able to independently support the Statement of Overriding Considerations and override the significant and unavoidable environmental effects of the proposed project. In addition, each reason is independently supported by substantial evidence contained in the administrative record.

1. The proposed project will further the industrial development of the City by locating a light industrial, warehouse/distribution facility on a currently-underutilized parcel designated by the City of Perris General Plan for such uses;
2. The proposed project will develop a warehouse distribution facility in proximity to other such uses, thereby minimizing land use impacts, and will take advantage of easy access to regional highways;
3. The proposed project will provide an expanded economic base for the City by generating substantial property tax revenue;
4. The proposed project will provide employment for construction workers and permanent positions required for project operation, thus contributing to the reduction of the housing-to-employment imbalance in the region;
5. The proposed project will contribute approximately \$9,028,386 in traffic impact mitigation fees to the City of Perris North Perris Road and Bridge Benefit District. These funds will pay for more than the proposed project's fair share of the traffic and circulation infrastructure in the project vicinity that will be needed to accommodate demand from future growth, including that of the proposed project;
6. The proposed project will improve and construct road infrastructure surrounding the project site, including along Indian Avenue, Webster Avenue, and Rider Street;
7. The proposed project will provide attractive landscaping along the perimeter of the project site that would surround a warehouse distribution facility at a location that was previously a sod farm and is currently fallow;
8. The proposed project would provide a number of amenities and benefits to the public where none now exist, such as sidewalks, undergrounded utilities, and improved drainage facilities.

H. Administrative Record

Various documents and other materials constitute the record of proceedings upon which the City Council bases its Findings (including the Statement of Overriding Considerations and the

Mitigation Monitoring and Reporting Program) and decisions contained herein. Documents related to the Final EIR are located in the City of Perris Development Services Department, Planning Division, 135 North “D” Street, Perris, California, 92570. Some documents included in the record of proceedings may also be located at the offices of consultants retained by the City for this proposed project. The custodian for the record of the proceedings is the Director of Development Services for the City of Perris.

I. Summary

1. Based on the foregoing Findings and the information contained in the administrative record, the City Council has made one or more of the following Findings with respect to each of the significant environmental effects of the proposed project identified in the Final EIR:

- a. Changes or alterations have been required in, or incorporated into, the proposed project which avoid or substantially lessen the significant environmental effects on the environment.
- b. Those changes or alterations are wholly or partially within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other public agency.
- c. Specific economic, social, technological, or other considerations make infeasible the Mitigation Measures or Alternatives identified in the Final EIR that would otherwise avoid or substantially lessen the identified significant environmental effects of the project.

2. Based on the foregoing Findings and information contained in the record, it is hereby determined that:

- a. All significant effects on the environment due to approval of the proposed project have been eliminated or substantially lessened where feasible;
- b. Any remaining significant effects on the environment found unavoidable are acceptable due to the factors described in the Statement of Overriding Considerations in Section G, above.

III. APPROVALS

The City Council hereby takes the following actions:

- A. The City Council certifies the Final EIR for the proposed project.

B. The City Council hereby adopts the Mitigation Monitoring and Reporting Program attached hereto and discussed in the Findings, Section II.D., above, and adopts and incorporates into the proposed project all mitigation measures within the responsibility and jurisdiction of the City.

C. The City Council hereby adopts these Findings in their entirety, including the Statement of Overriding Considerations.

D. Having independently reviewed and analyzed the Final EIR, certified the Final EIR, incorporated mitigation measures into the proposed project, and adopted the Findings (including the Statement of Overriding Considerations set forth therein and the Mitigation Monitoring and Reporting Program attached thereto), the City Council hereby approves the Rados Distribution Center – Perris project.



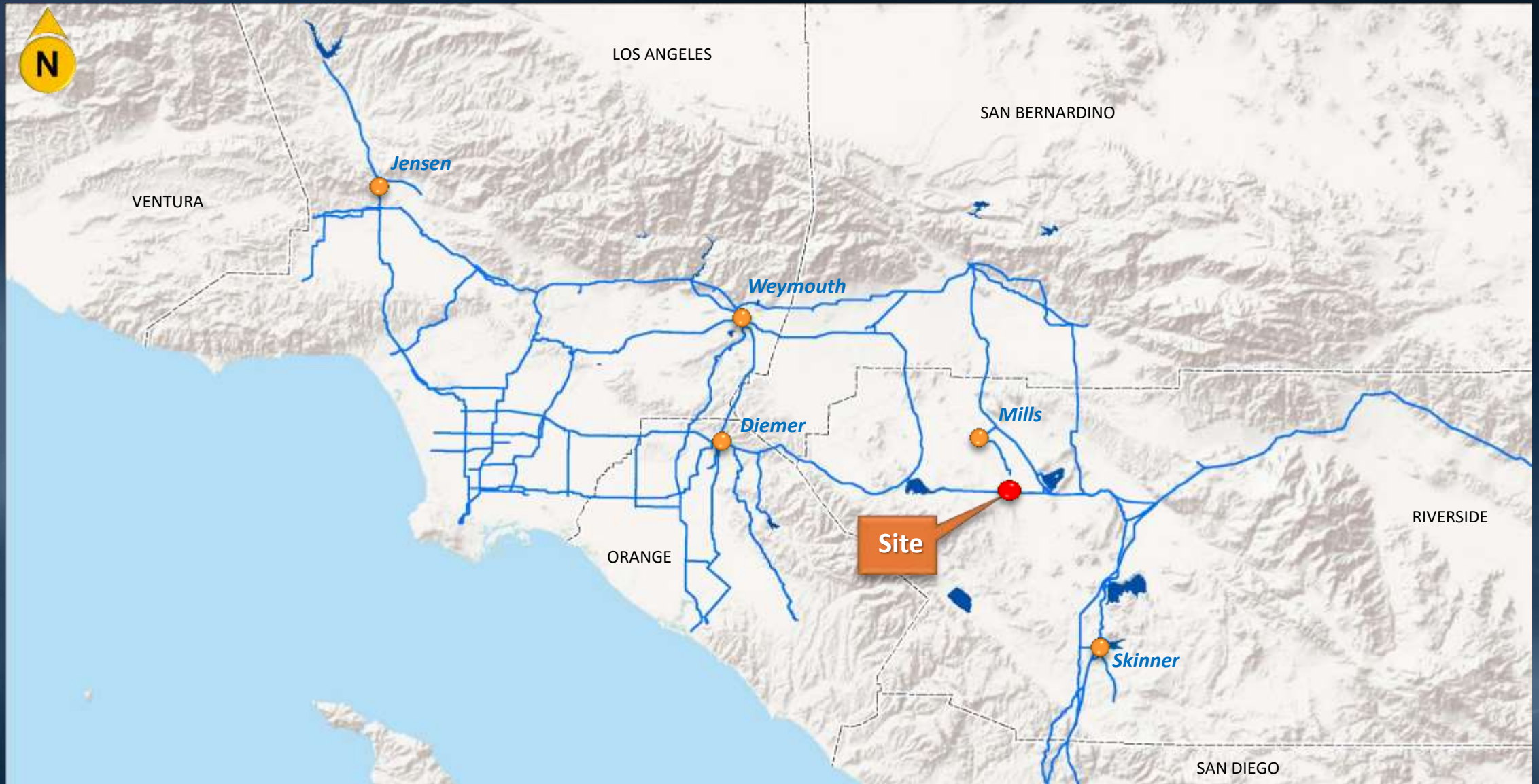
Authorize a Permanent Easement to the City of Perris

Real Property & Asset Management Committee

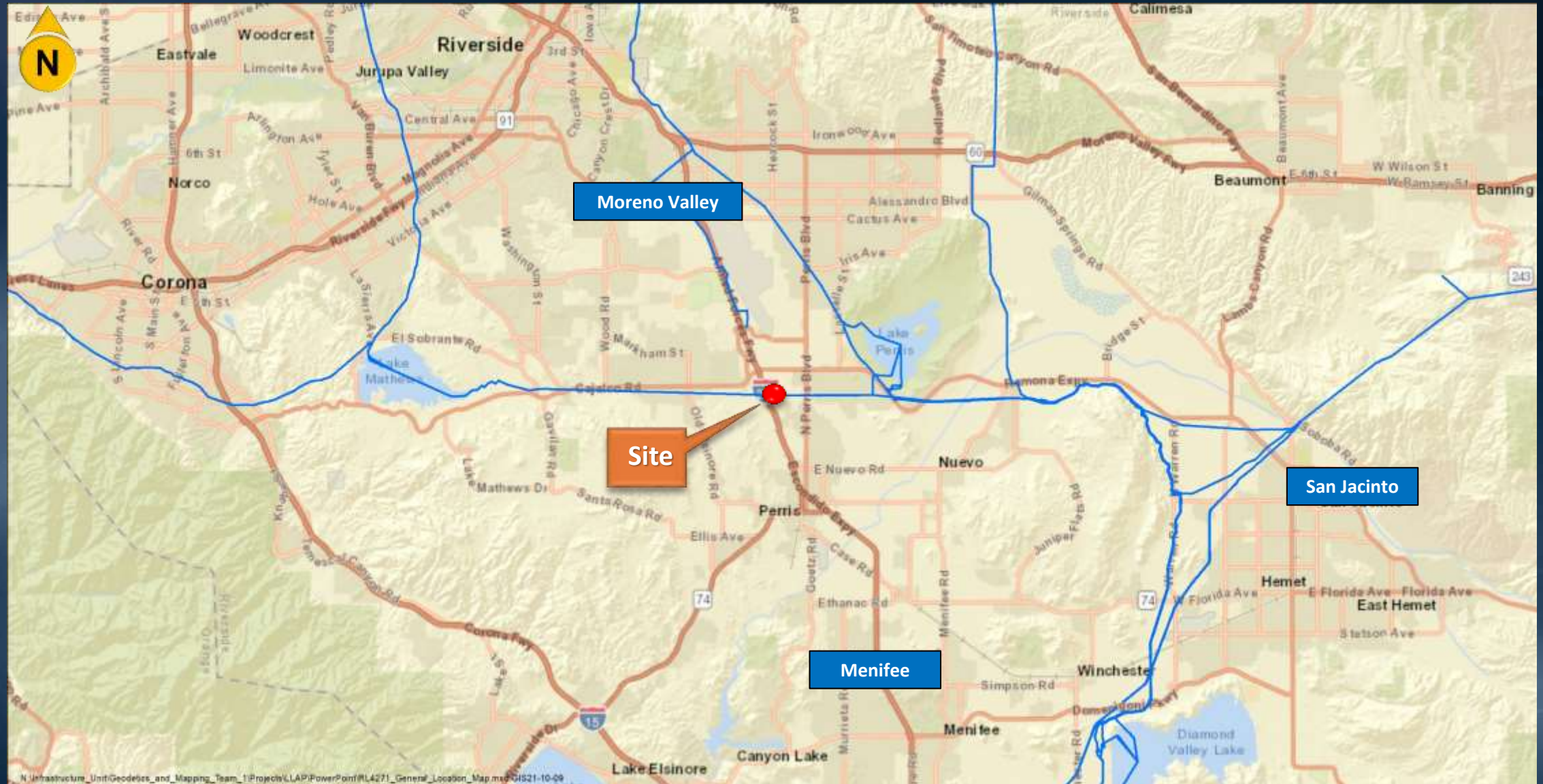
Item 7-10

October 12, 2021

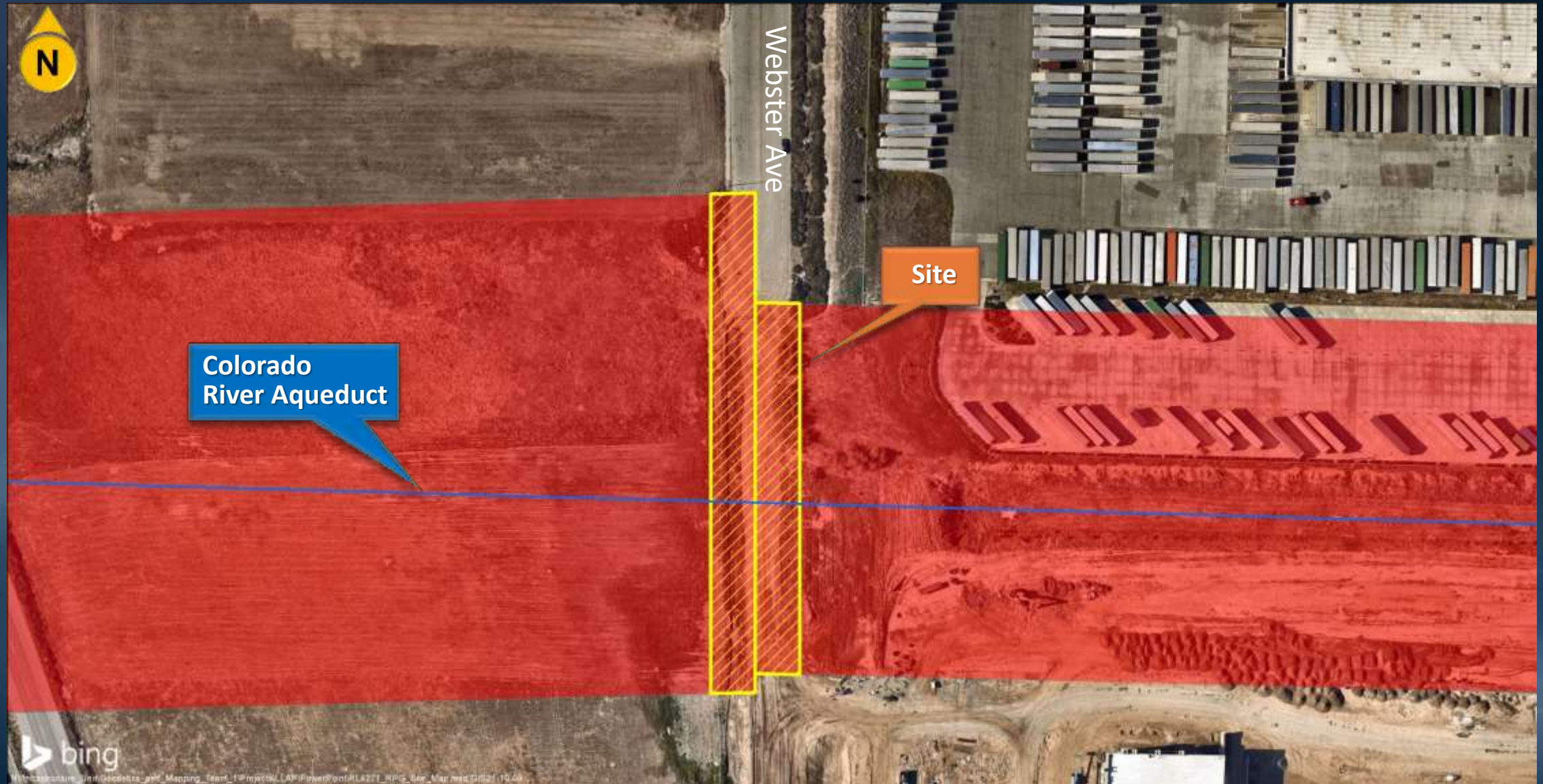
Distribution System Map



General Location Map



Site Map



Permanent Easement Provisions

- Mutually compatible use
- Metropolitan will receive a one-time processing fee of \$8,500
- The fair market value of the easement is \$291,000
- For public streets and related facilities
- All plans must be reviewed and approved by Metropolitan

Board Options

- Option #1
 - Review and consider the city of Perris' certified Final Environmental Impact Report, and take related CEQA actions; and authorize the granting of a permanent easement for public road purposes to the city of Perris.
- Option #2
 - Do not approve the permanent easement

Staff Recommendation

- Option #1





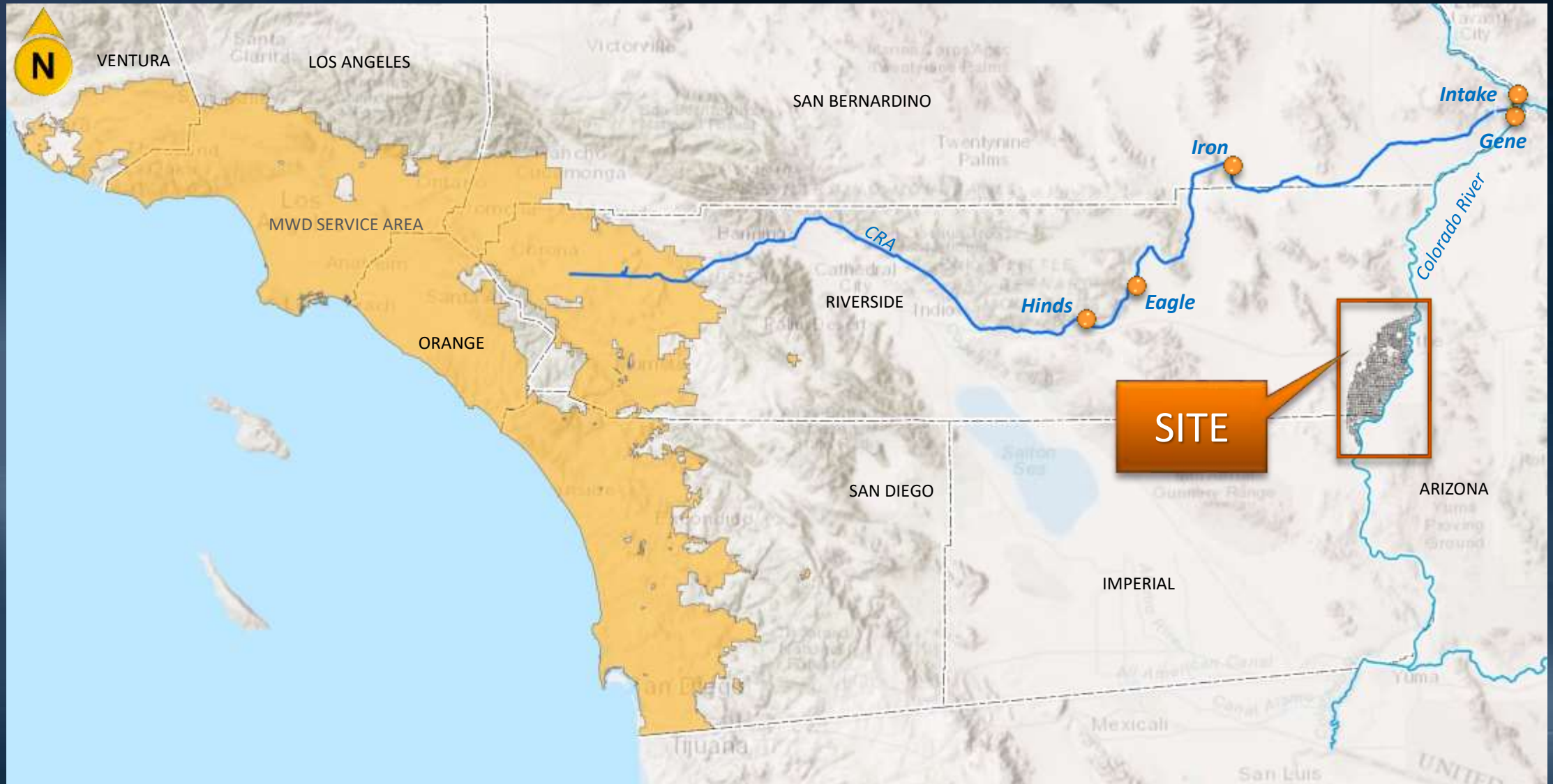
Authorize New Lease Agreements in the Palo Verde Valley

Real Property & Asset Management Committee

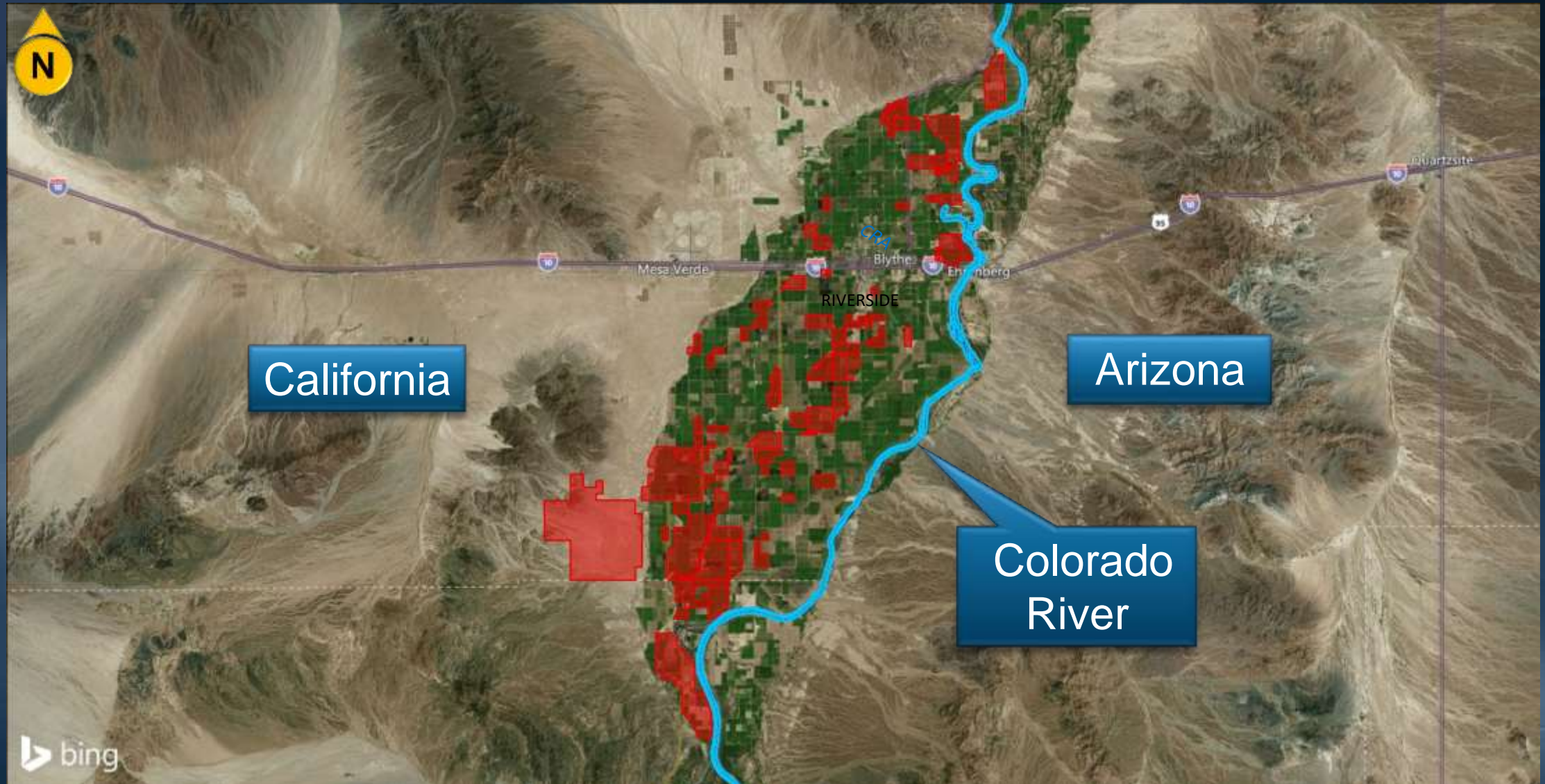
Item 7-11

October 12 , 2021






Service Area & CRA Map

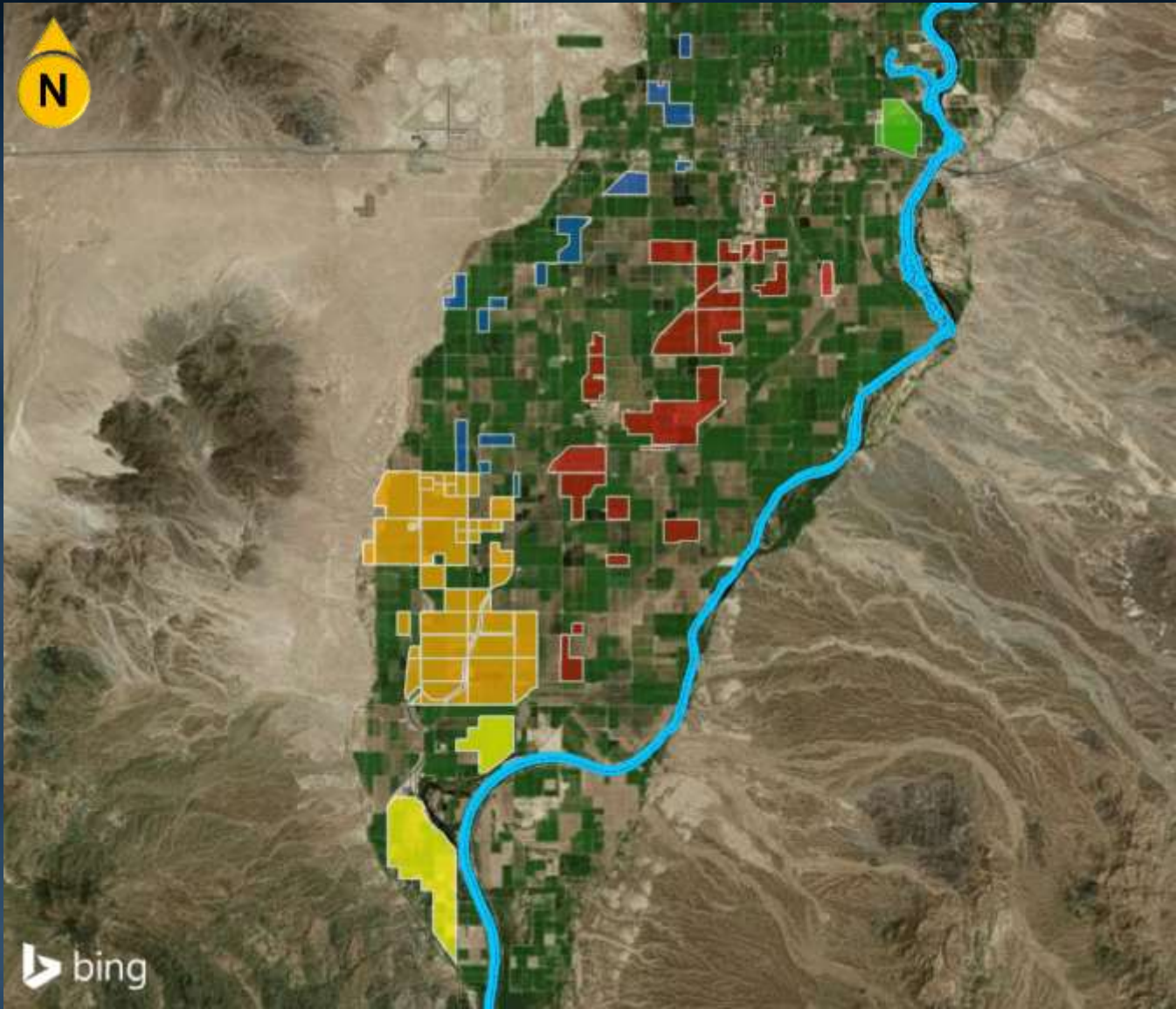


Metropolitan's Palo Verde Properties



Palo Verde Leases

<i>Leases</i>	<i>Gross Acres</i>
 Coxco	1,753
 DeConinck	585
 HayDay (HD1)	7,851
 HayDay (HD2)	5,449
 HayDay (HD3)	2,448
Total	18,086



Lease History

- 2001 MWD inherited two existing leaseholds
- 2015-16 MWD solicited new leases and included water saving incentives in lease terms
- 2017 Three new leases were executed
- 2018 Five lease amendments were executed to further incentivize water savings through crop choices
- 2021 Two leases expire December 31
Three lease amendments also expire December 31

Memorandum of Understanding (MOU)

- Metropolitan and PVID
- Established the Property Utilization Committee
- Goals and objectives developed jointly, providing for use of the 2001 Metropolitan-acquired property *“in a manner which best benefits Metropolitan, PVID and the Palo Verde Valley community”*

MEMORANDUM OF UNDERSTANDING
BETWEEN
THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA
AND
PALO VERDE IRRIGATION DISTRICT
REGARDING REAL PROPERTY IN THE PALO VERDE VALLEY

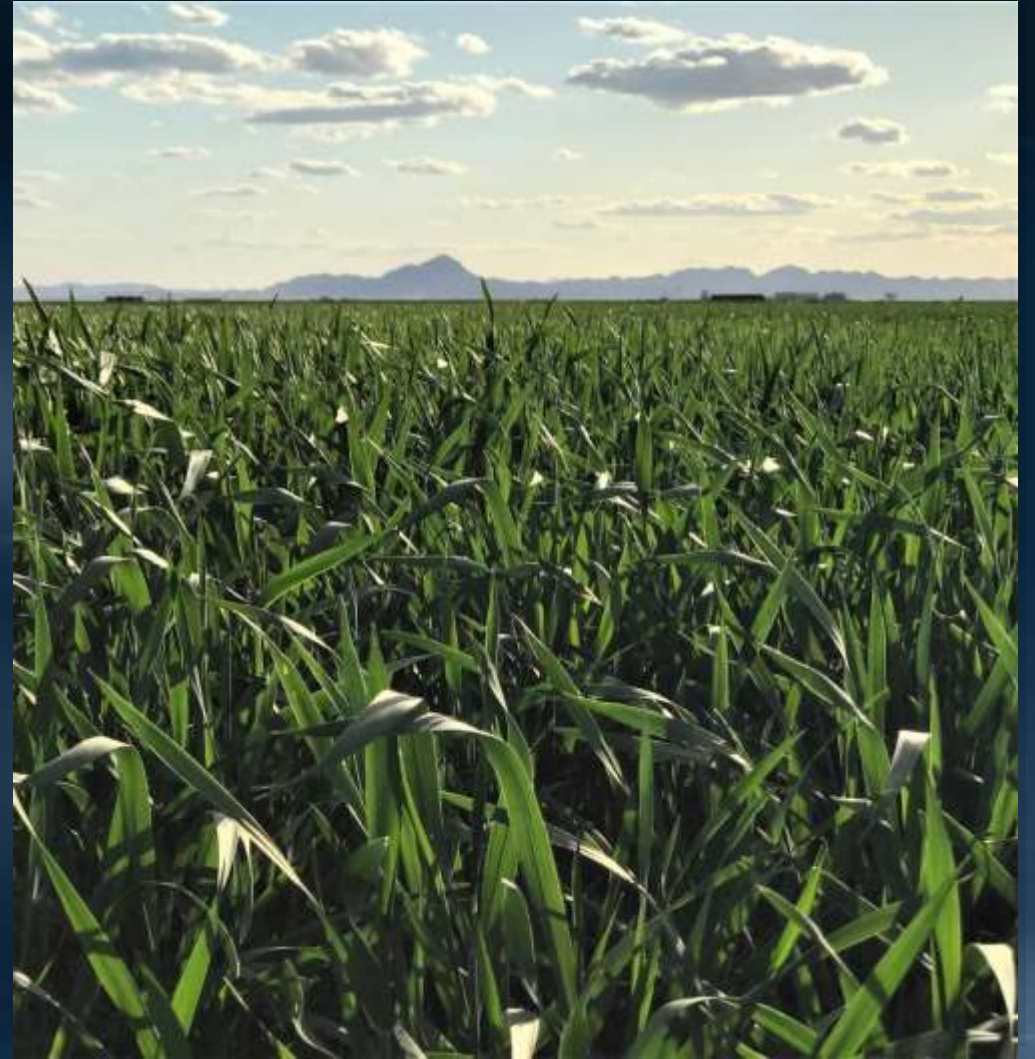
This Memorandum of Understanding (hereinafter, the “MOU”) is entered into by and between The Metropolitan Water District of Southern California (“MWD”) and the Palo Verde Irrigation District (“PVID”).

Recitals

- MWD is a special district of the State of California engaged in transporting, storing and distributing water in the counties of Los Angeles, Orange, Riverside, San Bernardino, San Diego and Ventura.
- PVID is a special district of the State of California engaged in furnishing Colorado River water for irrigation to the landowners of its service area in the counties of Riverside and Imperial.
- MWD is the purchaser of approximately 16,000 acres of real property (the “Property”) owned by San Diego Gas & Electric Company in the Palo Verde Valley, within and outside PVID’s service area.

Lease Objectives

- Reduce consumptive water use
- Maintain a vibrant agricultural economy
- Promote community acceptance and participation
- Advance state-of-the-art farming
- Keep administrative overhead low
- Generate lease revenue



Tenancy Evaluation Criteria

- Farming experience, including years farming in the region
- Financial viability and creditworthiness
- Rent and payment history
- Agricultural innovation





CLOSED SESSION





- **Board of Directors**
Executive Committee

10/12/2021 Board Meeting

8-1

Subject

Consider and adopt the Board's Statement of Commitment to Diversity, Equity, and Inclusion; the General Manager has determined that the proposed action is exempt or otherwise not subject to CEQA

Executive Summary

This letter presents the Board's Statement of Commitment to Diversity, Equity, and Inclusion recommended by Chairwoman Gray for the Board of Directors' review and adoption.

Details

Background

As a follow-up to the discussion on "Expanding Diversity, Equity, and Inclusion" at the September 30, 2021 Board of Directors Retreat, the attached Board's Statement of Commitment to Diversity, Equity, and Inclusion (**Attachment 1**) is for the Board's consideration and adoption. Adoption of the Statement is an intentional commitment by the Board that will provide staff with guidance and support to develop, implement, and maintain policy and programs that make diversity, equity, and inclusion a priority.

Policy

Metropolitan Water District Administrative Code Section 11104: Delegation of Responsibilities

California Environmental Quality Act (CEQA)

CEQA determination for Option #1:

The proposed action is not defined as a project under CEQA because it involves continuing administrative activities, such as general policy and procedure making (Section 15378(b)(2) of the State CEQA Guidelines). In addition, the proposed action is not subject to CEQA because it involves Organizational or administrative activities of governments that will not result in direct or indirect physical changes in the environment (Section 15378(b)(5) of the State of CEQA Guidelines).

CEQA determination for Option #2:

None required

Board Options

Option #1

Adopt the Board's Statement of Commitment to Diversity, Equity, and Inclusion.

Fiscal Impact: None

Business Analysis: Adoption of the Board's Statement of Commitment to Diversity, Equity, and Inclusion supports staff's ability to develop, implement, and maintain diversity, equity, and inclusion focused policies and programs.

Option #2

Do not adopt the Board's Statement of Commitment to Diversity, Equity, and Inclusion.

Fiscal Impact: None

Business Analysis: Absence the adoption of the Board's Statement of Commitment to Diversity, Equity, and Inclusion could hinder staff's ability to develop, implement, and maintain diversity, equity, and inclusion focused policies and programs.

Staff Recommendation

Option #1



Gloria D. Gray
Chairwoman

10/8/2021
Date

Attachment 1 – Board's Statement of Commitment to Diversity, Equity, and Inclusion

Ref# bd12681260

The Board Statement on Diversity, Equity and Inclusion (DEI)

Metropolitan's commitment to leading, supporting, and fostering a diverse, equitable, and inclusive workplace begins with the Board of Directors. A Board whose members represent a broad range of culture, demographics, skills, experience, race, age, gender, educational, and professional backgrounds is essential to provide a range of perspectives and solutions to identify and overcome challenges, promote transparency, and support collaborative decision-making. We strive to reflect and represent the communities we serve.

We further recognize that each Metropolitan employee has unique experiences, perspectives, and viewpoints that are critical to our mission to provide adequate and reliable supplies of high-quality water in an environmentally and economically responsible way. Our intentional commitment to inclusion requires that we both embrace diversity as a core value and demand all Metropolitan employees be treated with fairness, respect, and dignity – both as a matter of law and of conscience. We are focused on maintaining an organization that is diverse, inclusive, and respectful of the wide variety of human experiences.

Equity and inclusion can only be realized for a diverse workforce through ensuring greater access, opportunity, empowerment, and advancement for all employees by ensuring there are no institutional barriers and providing the needed resources and support to enable the full participation of all individuals and groups of people, including members of marginalized groups. We steadfastly support a zero-tolerance policy for all forms of harassment, retaliation, and intimidation. We commit to continue building an organization that reflects the communities we serve and where every employee feels safe to be their authentic selves and can express their viewpoints without fear of retaliation. We support all steps necessary to create a workplace that values equity, inclusion and diversity – both in policy and in practice.

Our goal is to foster an environment that creates a profound sense of pride and is committed to the highest standards of diversity, equity, and inclusion at all levels of the organization. And we won't stop working until that inclusive environment is realized.



• Report on Conservation Activity for October

Summary

This report provides a summary of conservation activity and expenditures for August 2021.

Purpose

Informational

Detailed Report

Conservation Expenditures – FY2020/21 & FY2021/22 ⁽¹⁾

	Paid ⁽²⁾	Committed ⁽³⁾
Regional Devices	\$5.0 M	\$4.2 M
Member Agency Administered	\$1.7 M	\$9.2 M
Turf Replacement	\$9.9 M	\$8.3 M
Advertising	\$0.1 M	\$1.0 M
Other	\$1.9 M	\$1.1 M
TOTAL	\$18.6 M	\$23.8 M

(1) The Conservation Program biennial expenditure authorization was \$86 million and expected expenditures for rate setting purposes were \$50 million.

(2) As of 7/1/2020 - 8/31/2021

(3) Committed dollars as of September 10, 2021

Summary of Expenditures in August 2021: \$1,370,077 ⁽¹⁾



Turf Replacement Rebates:

August: 660,231 ft² removed

FY2020/21-FY2021/22: 5,105,097 ft² removed



Clothes Washers:

August: 940 units rebated

FY2020/21-FY2021/22: 19,911 units rebated



Smart Controllers:

August: 915 units rebated

FY2020/21-FY2021/22: 15,669 units rebated



Toilets:

August: 244 units rebated

FY2020/21-FY2021/22: 12,435 units rebated



Rain Barrels and Cisterns:

August: 386 units rebated

FY2020/21-FY2021/22: 3,453 units rebated



Sprinkler Nozzles:

August: 805 units rebated

FY2020/21-FY2021/22: 31,365 units rebated

Lifetime Water Savings to be achieved by all rebates in August 2021: 4,041 AF

FY2020/21-FY2021/22: 47,506 AF lifetime water savings

(1) Expenditures may include advertising and Water Savings Incentive Program activity in addition to the incentives highlighted above.



• **Board of Directors**
Finance and Insurance Committee

10/12/2021 Board Meeting

9-2


Subject

Compliance with Fund Requirements and Bond Indenture Provisions

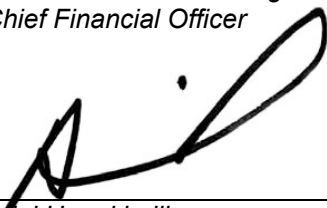
Executive Summary

Pursuant to the annual reporting requirement contained in Section 5204 of the Metropolitan Water District Administrative Code, entitled "Compliance with Fund Requirements and Bond Indenture Provisions," the General Manager has determined that during fiscal year 2020/21, Metropolitan was in compliance with the minimum fund requirements outlined in Division V, Chapter 2, Sections 5201 and 5202 of the Administrative Code, and the provisions of the articles and covenants contained in resolutions for all outstanding Metropolitan bonds.

Based upon information furnished by the General Manager and the Auditor's Department, the General Counsel concurs with this determination. A checklist certifying compliance with all applicable provisions is included as **Attachment 1**.



Katano Kasaine
Assistant General Manager/
Chief Financial Officer
9/29/2021
Date



Adel Hagekhalil
General Manager
9/29/2021
Date

Attachment 1 – Checklist for Compliance with Bonded Debt and Commercial Paper Requirements, Fiscal Year 2020/2021

Ref# cfo12676096

**CHECKLIST FOR COMPLIANCE WITH
BONDED DEBT AND COMMERCIAL PAPER REQUIREMENTS**

Fiscal Year 2020/2021

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MWD ACT

Item	Action	Responsible	Completion Date	Initials
MWD Act				
PART 4 – POWERS AND PURPOSES				
Chapter 1 – Powers Generally				
Aggregate indebtedness (Pt. 4, Chap. 1, Sec. 123)	Aggregate indebtedness shall not exceed 15% of assessed valuation of all taxable property within Metropolitan.	Controller	<u>06/30/2021</u>	<u></u>
PART 5 – BONDS AND OTHER EVIDENCES OF INDEBTEDNESS				
Chapter 1 – Bonds Requiring Approval of Voters				
Use of Bond Proceeds and Interest as Construction Cost (Pt. 5, Chap. 1, Art. 3, Sec. 228)	The proceeds of the bonds, except for premium and accrued interest, shall be placed in the Treasury of Metropolitan.	Treasurer	<u>06/30/2021</u>	<u></u>
	These proceeds shall be exclusively applied to the purposes and objects mentioned in the bond ordinance, except as otherwise provided in this section. Interest accrued on the bonds during construction and for one year thereafter may be deemed a construction cost and may be paid from bond proceeds. Premium and accrued interest shall be applied to bond interest payments and bond retirement.	Controller	<u>06/30/2021</u>	<u></u>

MWD ACT

Item	Action	Responsible	Completion Date	Initials
Chapter 1.6 – Revenue Bonds				
Revenues to Pay Certain Costs (Pt. 5, Chap. 1.6, Sec. 238)	<p>The board shall fix the rate or rates at which water shall be sold pursuant to Chapter 2 (commencing with Section 130) of Part 4 which, with reasonable allowances for contingencies and error in the estimates, shall be at least sufficient, together with any other revenues not derived from the levy of taxes, to provide revenues to pay the following amounts in the order set forth:</p> <ol style="list-style-type: none"> 1. The necessary expenditures for operating and maintaining the properties, works, and facilities of Metropolitan, and also for such charges as may be payable by Metropolitan under a contract with this state for water which are classified as operation, maintenance, power, and replacement charges. 2. The principal and interest of the revenue bonds as the same become due and payable, including any sinking fund payments for term bonds, if any. 3. The deposits into any reserve funds that may be established to secure the revenue bonds. 4. Any other obligations which are liens or encumbrances upon the water revenues. 	Revenue and Budget Manager	<u>06/30/2021</u>	<u>AVB</u>

MWD ACT

Item	Action	Responsible	Completion Date	Initials
PART 6 – TAXES				
Chapter 1 – General Procedure				
Tax Levies - Determination of Rates (Pt. 6, Chap. 1, Art. 2, Sec. 307)	On or before the 20th day of August*, the board shall, by resolution, determine the amount of money necessary to be raised by taxation during the fiscal year beginning the first day of July next preceding for all Metropolitan purposes and shall fix rates of taxation designating the number of cents, upon each one hundred dollars (\$100) assessed valuation of property taxable by Metropolitan in each county and shall levy a tax accordingly.	Controller	<u>06/30/2021</u>	<u></u>
Tax Levies – Bond Service (Pt. 6, Chap. 1, Art. 2, Sec. 308)	If Metropolitan income will be inadequate to pay interest and principal (including any sinking fund) of any G.O. bonds, the Board shall at the time of fixing the tax levy, levy a tax sufficient to pay annual interest and such principal that becomes due before money from the next general tax levy becomes available. These taxes shall be used to pay only this principal and interest, except that it may be used to pay principal and interest on any voter-authorized bonds then outstanding or yet to be issued if the tax was originally levied to pay for authorized but unsold bonds which then remain unsold. Taxes shall also be levied to meet the requirement of any resolution adopted according to Section 287, Tax Levy for Notes. (See above.)	Controller	<u>06/30/2021</u>	<u></u>

MWD ACT

Item	Action	Responsible	Completion Date	Initials
Statement of Tax Rates (Pt. 6, Chap. 1, Art. 2, Sec. 310)	Before the first day of September* the Controller of Metropolitan shall prepare and transmit to the auditor of each county in which property taxable by Metropolitan lies, a statement showing the tax rates to be applied to property taxable by Metropolitan. Such rates shall be the rates fixed by resolution of the board modified to the extent necessary to produce from each declaring public agency only the amount apportioned to it in such resolution, less any amount paid or undertaken to be paid by such agency, or credited thereto as provided in Chapter 2 (commencing with Section 331) of this part.	Controller	<u>06/30/2021</u>	<u><i>BH</i></u>

*FN- Dates are directory only, and any failure to perform specified acts by the time specified shall not impair the authority conferred in the Act.
(Pt. 6, Chap. 1, Art. 1, Sec. 320).







ADMINISTRATIVE CODE

Item	Action	Responsible	Completion Date	Initials
Administrative Code				
Division IV – Water Service Policies				
Chapter 3 – Water Sales Revenues				
Cost of Service and Revenue Requirement (§ 4301)(a)	The District shall fix rates for water such that anticipated water sales, revenues, together with anticipated revenues from any water standby or availability of service charge (such as the readiness-to-serve charge or capacity charge) or assessment, ad valorem tax revenues and other revenues pay the expenses of the District, provide for repairs and maintenance, provide for payment of the purchase price or other charges for property or services or other rights acquired by the District, and provide for the payment of the interest and principal of the District's outstanding bonded debt. Subject to the foregoing, such rates and charges shall reflect the costs of the district's major service functions, including water supply, conveyance, power, storage, distribution and treatment, to the greatest degree practicable.	Revenue and Budget Manager	<u>06/30/2021</u>	<u>AVB</u>
Formula for Allocation of Water Revenues (§ 4301)(b)	Notwithstanding the provisions in subsection (a) above, amounts raised by ad valorem property taxation complied with the limitations established by section 124.5 of the Act.	Revenue and Budget Manager	<u>06/30/2021</u>	<u>AVB</u>

ADMINISTRATIVE CODE

Item	Action	Responsible	Completion Date	Initials
Division V – Financial Matters				
Chapter 1 – Administrative Matters				
Investment of Surplus Funds (§ 5101)	The Board shall delegate to the Treasurer annually the authority to invest or to reinvest Funds of Metropolitan.	Treasurer	<u>06/30/2021</u>	<u>kk</u>
		Legal	<u>06/30/2021</u>	<u>JR</u>
Reporting Requirements of the Treasurer (§ 5114)	The Treasurer shall not later than the June Board meeting submit Statement of Investment Policy to the Board for the following year.	Treasurer	<u>06/30/2021</u>	<u>kk</u>
		Legal	<u>06/30/2021</u>	<u>JR</u>
Chapter 2 – Financial Policies				
<u>Funds Established (§ 5201)</u>				
General Obligation Bond Interest and Principal Funds and the Waterworks General Obligation Refunding Bonds Interest and Principal Funds (§ 5201(a))	Cash and securities in each fund as of June 30 shall equal debt service for the next 18 months, less anticipated revenue from tax levy specifically for this debt service.	Controller	<u>06/30/2021</u>	<u>BHX</u>
Water Revenue Bonds Interest and Principal Funds, the Water Revenue Bonds Reserve Funds, the Water Revenue Refunding Bonds Interest and Principal Funds and the Water Revenue Refunding Reserve Bonds (§ 5201(b))	Cash and securities shall at least equal the minimums required by the respective resolutions of issuance for these bonds.	Controller	<u>06/30/2021</u>	<u>BHX</u>
For the Subordinate Bonds Interest and Principal Funds, the Subordinate Water Revenue Bonds Reserve Funds, the Subordinate Water Revenue Refunding	Cash and securities shall at least equal the minimums required by the respective resolutions of issuance for these bonds.	Controller	<u>06/30/2021</u>	<u>BHX</u>

ADMINISTRATIVE CODE

Item	Action	Responsible	Completion Date	Initials
Bonds Interest and Principal Funds and the Subordinate Water Revenue Refunding Reserve Funds (§ 5201(c))				
Bond Construction Funds (§ 5201(d))	No minimum requirement; provided that any cash and securities in such funds shall be restricted to use for the purposes such finances were required.	Controller	<u>06/30/2021</u>	<u></u>
State Contract Fund (§ 5201(e))	Cash and securities on hand June 30 and December 31 shall equal the capital payments to the DWR that are due on July 1, of the same year and January 1 of the following year.	Controller	<u>06/30/2021</u>	<u></u>
Special Tax Fund (§ 5201(f))	No minimum requirement.	Controller	<u>06/30/2021</u>	<u></u>
Operation and Maintenance Fund (§ 5201(g))	Cash and securities shall at least equal the minimum required by the respective resolutions of issuance for revenue bonds (i.e., amount sufficient to pay estimated O&M Expenditures during current and next succeeding calendar month).	Controller	<u>06/30/2021</u>	<u></u>
Revolving Construction Fund (§ 5201(h))	No minimum requirement. However, cash and securities in this fund shall be available for transfer to the Water Rate Stabilization Fund and the Water Treatment Surcharge Stabilization Fund at the discretion of the Board.	Controller	<u>06/30/2021</u>	<u></u>
Commercial Paper Series A and B, Note Payment Funds (§ 5201(i))	Deposits to these funds shall be in an amount sufficient to pay principal of and interest on the Commercial Paper Notes in an amount at least	Controller	<u>06/30/2021</u>	<u></u>

ADMINISTRATIVE CODE

Item	Action	Responsible	Completion Date	Initials
	equal to one-half of the projected interest payments due on such notes in the subsequent fiscal year.			
Water Standby Charge Fund (§ 5201(j))	There shall be no minimum requirement; provided that any cash and securities in such fund shall be restricted to use for the purposes such monies were authorized.	Controller	<u>06/30/2021</u>	<u>BHx</u>
Excess Earnings Funds (§ 5201(k))	The minimum requirement for all Excess Earnings Funds shall be the amounts deposited into the funds in accordance with the provisions of the Tax and Nonarbitrage Certificates and Resolutions for the Bonds.	Controller	<u>06/30/2021</u>	<u>BHx</u>
Iron Mountain Landfill Closure/Postclosure Maintenance Fund (§ 5201(m))	Cash and securities as of June 30, shall be at least equal to the CEO's latest estimates of closure and postclosure maintenance costs.	Controller	<u>06/30/2021</u>	<u>BHx</u>
Optional Redemption Funds (§ 5201(n))	The minimum requirement shall be the amount necessary to redeem such untendered, refunded bonds which have been called for redemption.	Controller	<u>06/30/2021</u>	<u>BHx</u>
Water Transfer Fund (§ 5201(o))	All amounts budgeted or pledged for purchase of water through transfers or similar arrangements and for the costs of filling the Diamond Valley Lake Project, shall be set aside in such fund and used solely for such purpose.	Controller	<u>06/30/2021</u>	<u>BHx</u>

ADMINISTRATIVE CODE

Item	Action	Responsible	Completion Date	Initials
<u>Fund Parameters (§ 5202)</u>				
Revenue Remainder Fund (§ 5202(a))	The minimum cash and securities held in the Water Revenue Remainder Fund as of June 30 shall be equal to a portion of fixed costs estimated to be recovered by water sales revenues for the eighteen months beginning with the immediately succeeding July.	Revenue and Budget Manager	<u>06/30/2021</u>	<u>AVB</u>
Replacement and Refurbishment Fund (§ 5202(b))	The end-of-year fund balance may not exceed \$160 million. Available monies in excess of \$160 million at June 30 shall be transferred to the Water Rate Stabilization Fund, unless otherwise determined by the Board. (Amounts increased from \$95 million pursuant to Board adoption of Board Letter 8-1, on April 8, 2014)	Controller	<u>06/30/2021</u>	<u>BAK</u>
Water Rate Stabilization Fund (§ 5202(c and e))	Remaining amounts in the Revenue Remainder Fund and the Replacement and Refurbishment Fund, collectively, on June 30, after meeting requirements in Sections 5202(a) and (b), shall be transferred to the Water Rate Stabilization Fund, and to the extent required under Section 5202(d), to the Water Treatment Surcharge Stabilization Fund.	Controller	<u>06/30/2021</u>	<u>BAK</u>








ADMINISTRATIVE CODE

Item	Action	Responsible	Completion Date	Initials
	The amount held shall be targeted to be equal to the portion of fixed costs estimated to be recovered by water sales during the two years immediately following the eighteen month period in Section 5202(a). Funds in excess of targeted amount shall be utilized for capital expenditures in lieu of the issuance of additional debt, or for the redemption, defeasance or purchase of outstanding bonds or commercial paper, as determined by the Board. Provided that the fixed charge coverage ratio is at or above 1.2, amounts ratio in the Water Rate Stabilization Fund may be used for any lawful purpose as determined by the Board.	Revenue and Budget Manager	<u>06/30/2021</u>	<u>AVB</u>
Water Treatment Surcharge Stabilization Fund (§ 5202(d))	After transferring funds as specified in Section 5202(c), that portion of those funds, if any, attributable to collection of treatment surcharge revenue in excess of treatment costs shall be transferred to the Water Treatment Surcharge Stabilization Fund. If a deficiency in treatment surcharge revenue exists, a transfer of funds will be made from this fund to reimburse funds used for the deficiency.	Controller	<u>06/30/2021</u>	<u>BAK</u>
Indirect Credit of Metropolitan (§ 5203)	The GM may negotiate with DWR on the basis of using the indirect credit of Metropolitan to finance State Revenue Bonds so long as Metropolitan's obligation does not exceed its required obligation under the State contract.	GM (by Office of the CFO)	<u>06/30/2021</u>	<u>kk</u>





ADMINISTRATIVE CODE

Item	Action	Responsible	Completion Date	Initials
Compliance with Fund Requirements and Bond Indenture Provisions (§ 5204)	As of June 30 of each year, the GM shall make a review to determine whether the minimum fund requirements outlined in Chapter 2 have been met and whether Metropolitan has complied with the provisions of the articles and covenants contained in the resolutions of issuance for all outstanding Metropolitan bond issues during the preceding fiscal year. The GM, after consulting with the General Counsel, shall report the results of his review, in writing, to the Board of Directors annually.	GM (by Office of the CFO)	<u>06/30/2021</u>	<u>kk</u>

FUND REQUIREMENTS

Item	Action	Responsible	Completion Date	Initials
FUND REQUIREMENTS				
Construction Funds	Metropolitan shall maintain certain funds and such funds shall be restricted to use for the purposes such finances were required..	Controller	<u>06/30/2021</u>	<u></u>
Water Revenue Fund	Monies in these funds shall be used solely for the purposes authorized in Chapter 1.6 of Part 5 of the Metropolitan Water District Act.	Controller	<u>06/30/2021</u>	<u></u>
	All operating revenues shall be allocated to this fund and all transfers from it shall be as specified in Article V of Board Resolution 8329.	Controller	<u>06/30/2021</u>	<u></u>
Operation and Maintenance Fund	Transfer amounts sufficient for O&M Expenditures in current calendar month and succeeding calendar month from the Revenue Fund to the O&M Fund on or before first business day of each calendar month.	Controller	<u>06/30/2021</u>	<u></u>
Interest & Principal Funds	Transfer appropriate amounts from the Revenue Fund to the Interest & Principal Funds on or before first business day of each calendar month.	Controller	<u>06/30/2021</u>	<u></u>
	If the above transfer(s) are not sufficient, then the deficiency shall be transferred from the Reserve Fund.	Controller	<u>06/30/2021</u>	<u></u>
Water Rate Stabilization Fund	Excess monies on or before the first business day of any calendar month shall be transferred to the Revenue Remainder Fund.	Controller	<u>06/30/2021</u>	<u></u>

FUND REQUIREMENTS

Item	Action	Responsible	Completion Date	Initials
	The amount held shall be targeted to be equal to the portion of fixed costs estimated to be recovered by water sales during the two years immediately following the eighteen month period in Section 5202(a). Funds in excess of targeted amount shall be utilized for capital expenditures in lieu of the issuance of additional debt, or for the redemption, defeasance or purchase of outstanding bonds or commercial paper, as determined by the Board. Provided that the fixed charge coverage ratio is at or above 1.2, amounts ratio Water Rate Stabilization Fund may be used for any lawful purpose as determined by the Board.			
Revolving Construction Fund	There is no minimum amount required for this fund. Construction expenditures made from this fund may be reimbursed with proceeds from security sales.	Controller	<u>06/30/2021</u>	<u></u>
Commercial Paper Note Payment Fund	For the Commercial Paper Note Payment Fund, Metropolitan shall deposit amounts sufficient to pay principal of, and interest on, the Commercial Paper Notes and repayment of any Advances as the same become due.	Controller	<u>06/30/2021</u>	<u></u>
Bond Service Fund ,	Cash and securities are restricted to use solely for the purposes authorized in Chapter 1.6 of Part 5 of the MWD Act. And must be at least equal to the	Treasurer	<u>06/30/2021</u>	<u></u>
		Controller	<u>06/30/2021</u>	<u></u>

FUND REQUIREMENTS

Item	Action	Responsible	Completion Date	Initials
	minimum required by Resolution #8329, Section 5.06 for payment of interest and principal.			
Water Revenue Bond Reserve Funds	Transfer from the Bond Proceeds or operating revenues the "minimum reserve requirement" as defined in the Supplemental Resolution established for each series of Revenue Bonds.	Treasurer	<u>06/30/2021</u>	<u>kk</u>
		Controller	<u>06/30/2021</u>	<u>kk</u>
Investment of Proceeds,	Monies in any fund other than the Escrow Fund may be invested in any legally available obligation which matures or can be liquidated on or before the date on which monies are needed.	Treasurer	<u>06/30/2021</u>	<u>kk</u>
	Investments purchased with money from any fund shall be part of that fund as well as gains and losses related to those investments. For transferred funds, gains and losses shall be prorated for time spent in each respective fund.	Treasurer	<u>06/30/2021</u>	<u>kk</u>
	Cash and investments shall be available to meet payment or transfer from this fund as required by the Resolution of Issuance.	Controller	<u>06/30/2021</u>	<u>kk</u>
Warranty	An investment shall be valued at its cost for the purpose of determining the balance in any fund. Investments shall also be valued at market value. The Treasurer and each Fiscal Agent shall keep proper books of record and accounts for each transaction.	Controller	<u>06/30/2021</u>	<u>kk</u>

FUND REQUIREMENTS

Item	Action	Responsible	Completion Date	Initials
	Metropolitan shall preserve the security of the bonds and defend the rights of bondholders against all claims.	Legal	<u>06/30/2021</u>	<u>JR</u>

USE OF PROCEEDS AND TAX LEVY

Item	Action	Responsible	Completion Date	Initials
USE OF PROCEEDS AND TAX LEVY				
Tax Levy / Interest and Principal Fund G.O. Bonds	If revenues of Metropolitan are inadequate to pay principal/interest on the bonds, the Board shall, at the time of fixing the tax levy, levy a tax sufficient to pay all principal and interest due until sufficient funds shall be available from the next general tax levy. These monies shall be put in the Interest and Principal Fund and used solely to pay principal and interest on these bonds.	Controller	<u>06/30/2021</u>	<u><i>BH</i></u>
Payment of Serial and Term Bonds	If the defeasance method is used, (see Item "Escrow Fund"), principal shall be paid by transferring monies from the Interest & Principal Fund to the Retirement Fund. If the crossover method is used (see Item "Escrow Fund"), principal, if any, and interest shall be paid from the Escrow Fund until the refunding date. Afterward, the bonds shall be paid as in the first sentence of this item.	Treasurer	<u>06/30/2021</u>	<u><i>kk</i></u>
Tax Covenant	Metropolitan will comply with applicable requirements of the Internal Revenue Code of 1986, Sections 103, and 141 through 150.	Legal	<u>06/30/2021</u>	<u><i>JR</i></u>
		Controller	<u>06/30/2021</u>	<u><i>BH</i></u>
Additional Tax Covenant	Bond proceeds shall not be invested so as to become an "arbitrage bond" under Section 103 and 148 of the Internal Revenue Code of 1986 and the regulations of the Treasury Department and or which would cause the Bonds to lose exemption from federal income taxation of interest	Legal	<u>06/30/2021</u>	<u><i>JR</i></u>
		Controller	<u>06/30/2021</u>	<u><i>BH</i></u>
		Treasurer	<u>06/30/2021</u>	<u><i>kk</i></u>

**GENERAL OBLIGATION BONDS
DISTRICT SECURITIES INVESTIGATION LAW OF 1965**

Item	Action	Responsible	Completion Date	Initials
General Obligation Bond Optional Redemption Fund	Sufficient amounts shall be maintained in the Optional Redemption Fund to retire untendered Bonds which were refunded.	Controller	<u>06/30/2021</u>	<u>BH</u>
		Treasurer	<u>06/30/2021</u>	<u>kk</u>

U.S. TREASURY REGULATIONS

Item	Action	Responsible	Completion Date	Initials
U.S. TREASURY REGULATIONS				
Arbitrage Restrictions (Treasury Regulations, Section 1.148)	Arbitrage rebate calculations have been made for all outstanding Bond issues which are subject to rebate.	Controller	<u>06/30/2021</u>	<u><i>JBK</i></u>
		Legal	<u>06/30/2021</u>	<u>JR</u>

WATER REVENUE BONDS

Item	Action	Responsible	Completion Date	Initials
WATER REVENUE BONDS				
Punctual Payment	Metropolitan must punctually pay the principal or redemption price and interest due in respect of all Bonds in strict conformity with the terms of such Bonds and their respective Resolutions.	Treasurer	<u>06/30/2021</u>	<u>kek</u>
		Controller	<u>06/30/2021</u>	<u>Btk</u>
Discharge Claims	Metropolitan covenants to fully preserve and protect the priority and security of the Bonds of Metropolitan by paying all lawful claims for labor, materials and supplies in connection with the Water System which, if unpaid, may become a lien or charge upon the Operating Revenues prior or superior to the lien of the Bonds and impair the security of the Bonds. Metropolitan shall also pay all taxes and assessments or other governmental charges lawfully levied or assessed on the Water System or any part of the Operating Revenues.	Controller	<u>06/30/2021</u>	<u>Btk</u>
Against Sale, Eminent Domain	Metropolitan covenants that the Water System shall not be mortgaged or otherwise encumbered, sold, leased, pledged, any charge placed thereon, or disposed of as a whole or substantially as a whole unless such sale or other disposition be so arranged as to provide for a continuance of payments into the Water Revenue Fund sufficient in amount to permit payment therefrom of the principal and Accreted Value of and interest on and the premiums, if any, due upon the call and redemption thereof, of the Bonds and any Parity Obligations, and also to provide for such	Controller	<u>06/30/2021</u>	<u>Btk</u>



WATER REVENUE BONDS

Item	Action	Responsible	Completion Date	Initials
Against Sale, Eminent Domain (continued)	<p>payments into any reserve fund or account as are required under the terms of the Resolution or any Supplemental Resolutions or any Parity Obligations documents.</p> <p>The Operating Revenues shall not be mortgaged, encumbered, sold, leased, pledged, any charge placed thereon, or disposed of or used, nor shall any charge be placed thereon, except as authorized by the terms of the Resolution or any Supplemental Resolutions. Metropolitan further covenants that it will not enter into any agreement which impairs the operation of the Water System or any part of it necessary to secure adequate Net Operating Revenues to pay the principal and Accreted Value of and interest on the Bonds or any Parity Obligations or which otherwise would impair the rights of the Owners with respect to the Operating Revenues or the operation of the Water System. If any part of the Water System is sold and such sale shall adversely affect the adequacy of Net Operating Revenues to pay principal and Accreted Value of and interest on the Bonds or any Parity Obligations, the payment therefor shall, at the option of the Board, either be used for the acquisition, construction and financing of additions to and extension and improvements of the Water System or shall be used to pay or call and redeem Outstanding Bonds in the manner provided in the Resolution or any Supplemental Resolutions.</p>			


WATER REVENUE BONDS

Item	Action	Responsible	Completion Date	Initials
Against Sale, Eminent Domain (continued)	Metropolitan covenants that any amounts received as awards as a result of the taking of all or any part of the Water System by the lawful exercise of eminent domain or sale under threat thereof which shall adversely affect the adequacy of Net Operating Revenues to pay principal and Accreted Value of and interest on the Bonds or any Parity Obligations shall either be used for the acquisition and/or construction of improvements and extensions of the Water System or shall be placed in the Bond Service Fund or the Redemption Fund and shall be used to pay or call and redeem Outstanding Bonds in the manner provided in the Resolution.			
Insurance	Metropolitan covenants that it shall at all times maintain with responsible insurers, or through a program of self-insurance (or a combination thereof) all such insurance on the Water System as is customarily maintained with respect to works and properties against accident to, loss of or damage to such works or properties. If any useful part of the Water System shall be damaged or destroyed, such part shall be restored to use. The money collected from insurance against damage to or destruction of the Water System shall be used for repairing or rebuilding the damaged or destroyed Water System, and to the extent not so applied, shall be applied to the retirement of any Outstanding Bonds.	Risk Manager	<u>06/30/2021</u>	<u>DSB</u>

WATER REVENUE BONDS

Item	Action	Responsible	Completion Date	Initials
	Metropolitan shall also (by self-insuring or by maintenance with responsible insurers, or by a combination thereof) provide for workers' compensation insurance and insurance against public liability and property damage to the extent reasonably necessary to protect Metropolitan and the Owners.			
Records and Accounts	Metropolitan shall keep proper books of records and accounts of the Water System separate from all other records and accounts in which complete and correct entries shall be made of all transactions relating to the Water System. Such books shall at all times be subject to the inspection of the Owners of not less than 10 percent of the Outstanding Bonds and any Parity Obligations, or their representatives authorized in writing.	Controller	<u>06/30/2021</u>	<u></u>
	Metropolitan shall cause the books and accounts of the Water System to be audited annually by an independent certified public accountant or firm of certified public accountants, and will make available for inspection by the Owners at the principal office of Metropolitan, and at the office of each Fiscal Agent, a copy of the report of such accountant or accountants.	Auditor	<u>06/30/2021</u>	<u>GCR</u>
Operating in an Efficient and Economical Manner	Metropolitan covenants and agrees to conduct the operations of the Water System in an efficient and economical manner and to maintain and preserve	Operations	<u>06/30/2021</u>	<u></u>

WATER REVENUE BONDS

Item	Action	Responsible	Completion Date	Initials
Rate Covenants	<p>the Water System in good repair and working order.</p> <p>Metropolitan covenants in the Master Resolution that it will prescribe, revise, and collect rates and charges for the services, facilities, availability and water of the Water System which, after making allowances for contingencies and error in the estimates, will provide Operating Revenues, together with any Additional Revenues (defined in the Master Resolution to include interest, profits and other income received from the investment of any monies of Metropolitan and other revenues of Metropolitan (other than Operating Revenues) to the extent available to pay debt service on the Bonds), at least sufficient to pay the following amounts in the order set forth:</p> <ol style="list-style-type: none"> 1. Operation and Maintenance Expenditures; 2. Principal of, premium, if any, and interest on the Prior Lien Bonds and any required deposits into any reserve funds or accounts for the Prior Lien Bonds; 3. Interest on and Bond Obligation (that is, the principal amount of any Current Interest Bond and the Accreted Value of any Capital Appreciation Bond, including Mandatory Sinking Account Payment) of the Outstanding Bonds and any Parity 	Controller	<u>06/30/2021</u>	

WATER REVENUE BONDS

Item	Action	Responsible	Completion Date	Initials
Rate Covenants (continued)	Obligations as the same become due and payable;			
	4. All other payments required for compliance with the Master Resolution or any Supplemental Resolutions (including any required deposit to any reserve fund or account for any Series of Bonds); and			
	5. All other payments required to meet any other obligations of Metropolitan which are charges, liens or encumbrances upon or payable from Net Operating Revenues.			
Additional Indebtedness	Metropolitan covenants in the Master Resolution that no additional indebtedness evidenced by revenue bonds, revenue notes or any other evidences of indebtedness payable out of its Operating Revenues shall be issued pursuant to the Act or any other law of the State of California having any priority in payment of principal, premium (if any) or interest over the Bonds.	Legal	<u>06/30/2021</u>	<u>JR</u>
	Metropolitan covenants in the Master Resolution that, except for refunding bonds or Parity Obligations to pay or discharge outstanding Prior Lien Bonds, Bonds or Parity Obligations, and which do not result in any increase in the average annual debt service on all Prior Lien Bonds, Bonds or Parity Obligations to be Outstanding, no additional Bonds or Parity Obligations shall be created or incurred unless:	Controller	<u>06/30/2021</u>	<u>BHK</u>

WATER REVENUE BONDS

Item	Action	Responsible	Completion Date	Initials
Additional Indebtedness (continued)	<p>FIRST: Metropolitan is not in default under the terms of the Master Resolution.</p> <p>SECOND: Either (1) the Net Operating Revenues of Metropolitan for the latest fiscal year or for any 12 consecutive months within the last completed 24 month period ended not more than one month before the issuance of additional Bonds or Parity Obligations, or (2) the estimated Net Operating Revenues for the first completed fiscal year when improvements to the Water System financed by the proceeds of the additional Bonds or Parity Obligations would be in operation, shall have amounted to not less than the sum of (i) 120 percent of the Maximum Annual Debt Service in any Fiscal Year thereafter on all Bonds and Parity Obligations to be Outstanding immediately subsequent to the issuing or incurring of such additional Bonds or Parity Obligations plus (ii) 100 percent of the maximum annual debt service in any Fiscal Year thereafter on all Prior Lien Bonds to be Outstanding immediately subsequent to the issuing or incurring of such additional Bonds or Parity Obligations, as certified by the Board or a Metropolitan officer authorized by the Board to so certify. In making this calculation, Metropolitan may take into consideration any changes in water rates or charges which shall have been approved by the Board prior to the</p>			

WATER REVENUE BONDS

Item	Action	Responsible	Completion Date	Initials
Additional Indebtedness (continued)	creation of such additional Bonds or Parity Obligations, any increase in Net Operating Revenues which may arise from additions or improvements to the Water System to be made or acquired with the proceeds of such additional Bonds or Parity Obligations or using the proceeds of bonds previously issued, Additional Revenues and certain other funds specified in the Master Resolution.			
	THIRD: The amount in any reserve fund or account established for any Bonds or Parity Obligations will not be less than an amount required on the date of delivery of and payment of such additional Bonds or Parity Obligations by supplemental resolution or other documents creating such fund.			
Reserve Funds	Pursuant to a Supplemental Resolution, Metropolitan may establish a reserve fund or account for a series of Bonds to be maintained in such amount as may be set forth in such Supplemental Resolution.	Legal	<u>06/30/2021</u>	<u>JR</u>
Flow of Funds	Metropolitan shall allocate all Operating Revenues to the Water Revenue Fund and shall effect transfers from the Water Revenue Fund to the following special funds or accounts as soon as practicable in each month in the following order	Controller	<u>06/30/2021</u>	<u>BH</u>

WATER REVENUE BONDS

Item	Action	Responsible	Completion Date	Initials
Flow of Funds (continued)	<p>of priority and amounts shall be withdrawn from said special accounts only for the following purposes:</p> <p><i>First</i>, to the Operation and Maintenance Fund, amounts sufficient for the payment of the estimated Operation and Maintenance Expenditures during the current calendar month and the succeeding calendar month.</p> <p><i>Second</i>, Metropolitan shall make any required transfers for payment of the Prior Lien Bonds and the maintenance of any required reserve funds or accounts therefor.</p> <p><i>Third</i>, for deposit in the Bond Service Fund, at least (A) (i) an amount sufficient on a monthly pro rata basis to pay the aggregate amount of the interest which will become due and payable on the Bonds with a fixed rate of interest on the next interest payment date and (ii) 110 percent of the interest which the Treasurer estimates in his or her reasonable judgment will accrue during that month on the Bonds with a variable rate of interest,</p> <p><i>Fourth</i>, in the event that monies are withdrawn from the Reserve Fund (or any reserve account for other Bonds or Parity Obligations), to the Reserve Fund (or any reserve account for other Bonds or Parity Obligations), (i) one-sixth of any unreplenished prior withdrawal and (ii) the full amount of any deficiency due to a valuation of</p>			



WATER REVENUE BONDS

Item	Action	Responsible	Completion Date	Initials
Flow of Funds (continued)	<p>the Reserve Fund (or any reserve account for other Bonds or Parity Obligations) investments until the balance is at least equal to the amount required to restore the Reserve Fund unless the Interest Account contains at least the amount equal to the interest to become due and payable within the next six months and (B)(i) one-sixth of the semi-annual Bond Obligation becoming due and payable on the Outstanding Bonds within the next ensuing six months and (ii) one-twelfth of the yearly Bond Obligation becoming due and payable on the Outstanding serial Bonds or of the amount becoming due on term Bonds within the next twelve months, provided that if Metropolitan irrevocably determines by resolution that any principal payments on the Bonds of any series shall be refunded on or prior to their due dates or paid from amounts on deposit in a reserve fund maintained for Bonds of that series, no amounts need to be set aside toward such principal.</p> <p><i>Fifth</i>, to the Excess Earnings Fund (or any such fund or account for other Bonds or Parity Obligations), the amount, if any, required in accordance with Metropolitan's tax and nonarbitrage certificate delivered in connection with the issuance of the Bonds (or any other Bonds or Parity Obligations).</p> <p><i>Sixth</i>, for transfer for any required transfer or deposit for the payment of any obligation of</p>			



WATER REVENUE BONDS

Item	Action	Responsible	Completion Date	Initials
	Metropolitan with a lien on, or payable from, Net Operating Revenues junior to the Bonds.			
Investments of Monies in Funds and Accounts	All monies in any of the funds and accounts established pursuant to the Resolutions shall be invested solely in investments in which Metropolitan may legally invest sums subject to its control. Subject to the provisions of the First Supplemental Resolution, obligations purchased by the investment of monies in the various funds and accounts established pursuant to the Resolutions shall be deemed at all times to be a part of such funds and accounts and any income realized from investment of amounts on deposit in any fund or account therein shall be credited to such fund or account. The Treasurer shall sell or present for redemption any investments whenever it may be necessary to do so in order to provide monies to meet required payments or transfers from such funds and accounts. For the purpose of determining at any given time the balance in any such funds, any such investments constituting a part of such funds and accounts shall be valued at the then estimated or appraised market value of such investments. Amounts in the Construction Fund may be temporarily invested and the proceeds thereof and interest thereon shall be applied exclusively to the purposes set forth in the Resolutions. Investments credited to the 1991 Reserve Fund shall be valued as of	Treasurer	<u>06/30/2021</u>	<u>kek</u>

WATER REVENUE BONDS

Item	Action	Responsible	Completion Date	Initials
Investments of Monies in Funds and Accounts (Continued)	June 30 of each year (or the next preceding or succeeding business day, as determined by Metropolitan, if June 30 is not a business day) at their fair market value.			
Information	Metropolitan will deliver, or make available, to the Bank under each Standby Bond Purchase Agreement copies of its annual report, audited annual financial statements, quarterly unaudited financial report, quarterly no-default certificate (if applicable) and other documents as described in section 6.1 of the Standby Bond Purchase Agreement.	Controller	<u>06/30/2021</u>	<u></u>
Amendments Funds and Accounts (Continued)	The District will not amend, supplement, modify or waive any provisions of bond resolutions, the Paying Agent Agreement or any of the Related Documents, or consent to any of the foregoing, without the prior written consent of the Bank under the Standby Bond Purchase Agreement (if any); <i>provided, however</i> , the consent of the Bank will not be required for any amendment, supplement, modification or waiver of any of the foregoing documents which does not require the consent of the Owners unless such amendment, supplement, modification or waiver (a) affects the Bank's rights under such document or (b) affects any covenant of the District contained in Article VI of the Master Resolution. The District	Legal	<u>06/30/2021</u>	<u></u>

WATER REVENUE BONDS

Item	Action	Responsible	Completion Date	Initials
Amendments (continued)	will give the Bank notice as promptly as practicable (but in no event less than ten (10) Business Days) of any proposed amendment, supplement, modification or waiver of any provision of the applicable bond resolution and of any meeting of the Board at which any of the foregoing will be discussed or considered.			
Taxes and Liabilities	The District will pay all the indebtedness and obligations of the Water System promptly and in accordance with its terms and pay and discharge, or cause to be paid and discharged, promptly all taxes, assessments and governmental charges or levies imposed upon it or upon its income, or upon any of its property, real, personal, or mixed, or upon any part thereof, before the same shall become in default, except for those matters which are being contested in good faith by appropriate action or proceedings or for which the District has established adequate reserves in accordance with accounting principles of the Government Accounting Standards Board applied on a consistent basis.	Controller	<u>06/30/2021</u>	<u></u>
		Treasurer	<u>06/30/2021</u>	<u></u>

WATER REVENUE BONDS

Item	Action	Responsible	Completion Date	Initials
Paying Agent; Remarketing Agent	The District shall not substitute or replace the Paying Agent or the Remarketing Agent unless the District shall have received the prior written approval of the applicable Bank with respect to a successor or replacement for such Person, which approval shall not be unreasonably withheld.	Treasurer	<u>06/30/2021</u>	<u>kek</u>
Sale or Encumbrance of System	The District will not sell, dispose of or, except as permitted under the applicable Standby Bond Purchase Agreement, under the applicable Paying Agent Agreement or under the Resolutions, create any lien, security interest or other encumbrance on the Water System or on any of its Operating Revenues; <i>provided, however,</i> that this provision shall not prevent the District from disposing of any portion of the Water System which is being replaced or is deemed by the District to be obsolete, worn out, surplus or no longer needed for the proper operation of the System. Net proceeds from any such disposition shall be used only for such purposes provided in the Resolutions. Any agreement pursuant to which the District contracts with a person, corporation, municipal corporation or political subdivision to operate the Water System or to lease and/or operate all or part of the Water System shall not be	Controller	<u>06/30/2021</u>	<u>BAK</u>
		Legal	<u>06/30/2021</u>	<u>JR</u>

WATER REVENUE BONDS

Item	Action	Responsible	Completion Date	Initials
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considered as an encumbrance of the Water
System.

COMMERCIAL PAPER

Item	Action	Responsible	Completion Date	Initials
COMMERCIAL PAPER				
Punctual Payment	Metropolitan will duly and punctually pay principal and interest on every Note, and payments into and transfers to the Commercial Paper Note Payment Fund will be made in strict conformity with the terms of the Notes and the commercial paper resolution.	Treasurer	<u>NA</u>	<u>kek</u>
		Controller	<u>NA</u>	<u>Btk</u>
Records and Accounts	Metropolitan shall keep proper books of record and account, and cause its books and accounts to be audited annually by an independent CPA.	Controller	<u>NA</u>	<u>Btk</u>
		Auditor	<u>NA</u>	<u>GCR</u>
Rates	Metropolitan will prescribe, revise and collect such rates and charges for the services, facilities, availability and water of the Water System which shall provide Operating Revenues at least sufficient to pay:	Revenue and Budget Manager	<u>NA</u>	<u>AVB</u>
	1. Operation and Maintenance Expenses;			
	2. Principal, accreted value, interest and required deposits into reserve funds or accounts for the Prior Lien Obligations (including Prior Lien Bonds and Water Revenue Bonds);			
	3. Principal of and interest on the Notes and amounts due to a Bank under the Liquidity Facility, when due;			
	4. Any other obligations payable from Net Operating Revenues, expressly including amounts under the State Water Contract which			

COMMERCIAL PAPER

Item	Action	Responsible	Completion Date	Initials
	do not constitute Operation and Maintenance Expenses.			
No Maturity to Exceed Term of Liquidity Facility	Metropolitan shall not issue any Commercial Paper Note with a maturity date after the scheduled expiration date of a Liquidity Facility, without prior confirmation from the Rating Agencies that such action shall not adversely affect the rating on the Notes.	Treasurer Debt Management	<u>NA</u>	<u>kk</u>
Tax Exemption	Metropolitan will comply with applicable requirements of Section 103 and Sections 141 through 150 of the IRC and covenants in the Tax and Nonarbitrage Certificate.	Legal	<u>NA</u>	<u>JR</u>
Information	Metropolitan will deliver to the Bank copies of its annual report, audited annual financial statements, quarterly unaudited financial reports, quarterly Certificate of an Authorized Representative and other documents described in §5.01 of the Revolving Credit Agreement.	Debt Management	<u>NA</u>	<u>kk</u>
No Amendments	Metropolitan will not amend the Commercial Paper Resolution or Related Documents without the prior written consent of the Bank.	Legal	<u>NA</u>	<u>JR</u>
Proceeds of Loans	Metropolitan will use the proceeds of Revolving Loans only to pay Series B Notes and the proceeds of Term Loans only to refinance Revolving Loans. Metropolitan will not use the proceeds of any Loan to pay any Series A Note or for any other unauthorized purpose.	Treasurer Controller	<u>NA</u> <u>NA</u>	<u>kk</u> <u>kk</u>

COMMERCIAL PAPER

Item	Action	Responsible	Completion Date	Initials
Investments	Metropolitan shall not borrow money solely for the purpose of investment in an amount at any time greater than 20% of its unleveraged investment portfolio; maintain any of its portfolio in a pool of investments managed by another person whose investment practices would result in indirect violation of the above covenant; or invest in any derivative or investment with a derivative embedded in it, except to the extent all such investments do not exceed 20% of its unleveraged investment portfolio.	Treasurer	<u>NA</u>	<u>kk</u>
Issuing and Paying Agent and Dealers	Metropolitan shall not substitute or replace the Issuing and Paying Agent or any Dealer without the prior written approval of the Bank as to the successor or replacement.	Legal	<u>NA</u>	<u>JR</u>

SHORT-TERM CERTIFICATES

Item	Action	Responsible	Completion Date	Initials
SHORT-TERM CERTIFICATES				
Establishment and Application of Funds and Accounts	The District shall establish, and the Treasurer of the District shall maintain, such funds and/or accounts with respect to the Certificates, Credit Facilities and Trust Agreements as may be required pursuant to the terms of such Certificates, Credit Facilities and Trust Agreements	Treasurer	<u>06/30/2021</u>	<u>kk</u>
		Controller	<u>06/30/2021</u>	<u>BHx</u>



- **Board of Directors**
Communications and Legislation Committee

10/12/2021 Board Meeting

9-3

Subject

Update on expanded multimedia public awareness and outreach campaign for water conservation, including issuance of a request for proposals for a three-year contract for media buying services not to exceed \$10.5 million

Executive Summary

In preparation for potential severe drought conditions in 2022 and beyond and the need to maintain a high level of ongoing conservation messaging and marketing to Southern Californians, staff plans to expand and extend the current advertising and outreach campaign. To support this work, staff will initiate a request for proposals (RFP) for consulting services for strategic planning and media buy services beginning in early 2022 for a period of three years at a cost not to exceed a total of \$10.5 million to be paid from current and future funds from the conservation budget. Staff anticipates spending up to \$3.5 million of the total in the current fiscal year as part of the current conservation budget appropriation. Staff proposes that the remaining \$7 million be included in the next biennial budget (fiscal year 2022/23 and fiscal year 2023/24) for Conservation.

Details

In response to California's drought conditions, Governor Newsom's call for voluntary cuts to water use, and Metropolitan's August 2021 Water Supply Alert, staff developed and implemented a new multimedia and multilingual advertising and outreach campaign. The campaign launched in August with an initial media buy using \$510,000 of the External Affairs fiscal year (FY) 2021/22 board-approved advertising budget. Early results from the first month of the campaign showed 27 million impressions, driving 30,000 new visitors to bewaterwise.com. Traffic and weather radio advertisements were purchased on 42 English and Spanish-language stations, and 26 out-of-home billboards and transit shelter posters have been installed throughout the Southern California region. Grocery store print advertising placements are in Albertsons and Vons stores within disadvantaged community tracts, and Spanish-language print advertisements are featured in popular Latino grocery stores, including Superior and Cardenas.

In September, staff informed the Board of plans to use up to \$1 million from the Board-approved Conservation Credits budget to continue the campaign in the fall and winter. The campaign will reflect the need for increased conservation by Southern Californians and include additional social, digital, out-of-home, and radio advertising in general and ethnic media to reach diverse communities. The expanded budget also allows for high visibility television sponsorships, such as on-air programming with local broadcast networks and weather report advertising. The media strategy will also leverage more targeted advertising approaches in movie theaters, on gas pump screens, and in ethnic grocery stores. This phase of the campaign will begin in October and run through early 2022.

Due to the ongoing drought circumstances and the potential for continued or worsening conditions next year, staff is proposing to further extend and expand the current paid advertising and outreach campaign activities in 2022, including new efforts to increase multilingual messaging and outreach to underrepresented communities, and market current and potentially new conservation and rebate programs to the public.

To maximize Metropolitan's investment and reach, staff will initiate a RFP for consulting services to provide strategic advice and media buy services for a period of three years at a cost not to exceed \$10.5 million (\$3.5 million per year). The additional funding for this campaign and services will come from the conservation budget in the current fiscal year for the first \$3.5 million, and staff will include the balance in the next proposed biennial budget for the following two years. Contracting with a media agency with expertise in the Southern California media market will increase buying power by leveraging the combined spend of an outside agency to create better access and more efficiencies for Metropolitan's advertising dollars. Experienced media agencies have long-standing relationships with media vendors and can strategically negotiate, activate and optimize media buys, measure media effectiveness with real-time data and performance reporting, and provide tracking and third-party verification of advertising placements which will enable Metropolitan to closely monitor spending and expenditures.

In August, staff informed the Communications & Legislation Committee it would seek board authorization to initiate an RFP for these services. However, based on a review of the expenditures in the \$43 million conservation budget for FY 2021/22, the underspent conservation budget of the last fiscal year, and the conservation-related purpose of the campaign, staff has determined that the existing appropriation may be used for the campaign for the first year and staff will include the remainder of the proposal in the next proposed budget. At this time, staff is seeking board input into the process to ensure the RFP and staff's evaluation of proposals fully addresses the necessary scope of work, experience, and qualifications of firms to ensure both the efficiency and effectiveness of Metropolitan's conservation advertising and marketing campaigns.

Staff will return to the Board at the conclusion of the RFP solicitation, review, and evaluation process to seek board authorization for the selected agreement for a contract to provide media buying and placement services for a 2022-2024 water awareness and conservation advertising campaign.

Policy

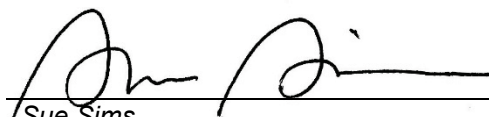
By Minute Item 51962, on April 14, 2020, the Board approved the current FYs 2020/21 and 2021/22 biennial budget, which includes a \$43 million annual appropriation for conservation and rates and charges based on an anticipated conservation expenditure of \$24 million.

By Minute Item 52116, on September 15, 2020, the Board approved various cost-containment measures to address COVID-19 financial impacts, including reducing spending on advertising for demand management programs.

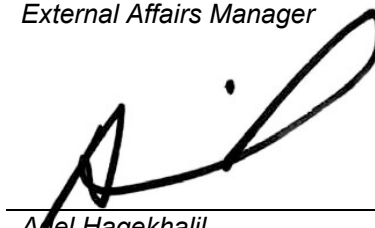
By Minute Item 52478, on August 17, 2021, the Board adopted a Condition 2 - Water Supply Alert, making a regional call for cities, counties, member agencies, and retail water agencies to implement extraordinary conservation through drought ordinances and other measures to mitigate the use of storage reserves.

Fiscal Impact

Up to \$3.5 million expenditure in current FY 2021/22 from the Board-approved conservation budget and staff will include \$7 million in the proposed conservation budget for FY 2022/23 and FY 2023/24 (continuance of contract in second and third years is dependent upon board approval of the biennial budget).



Sue Sims
External Affairs Manager
9/30/2021
Date



Adel Hagekhalil
General Manager
10/5/2021
Date

Ref# ea12680456



Update on water conservation campaign, including a request for proposal (RFP) for a three-year contract for media buying services not to exceed \$10.5 million

Communication and Legislation Committee

Item #9-3

October 11, 2021

Advertising and Outreach Campaign

45,000 visitors to
bewaterwise.com and
7 million impressions
on social media to
date

Our messages will
become more action-
oriented and specify
required reductions or
other requirements



Advertising and Outreach Campaign

New targeted and in-language outreach in communities

Placements in 50 locations, primarily in underserved areas in Los Angeles, Inland Empire, Orange County, San Diego counties



Advertising and Outreach Campaign

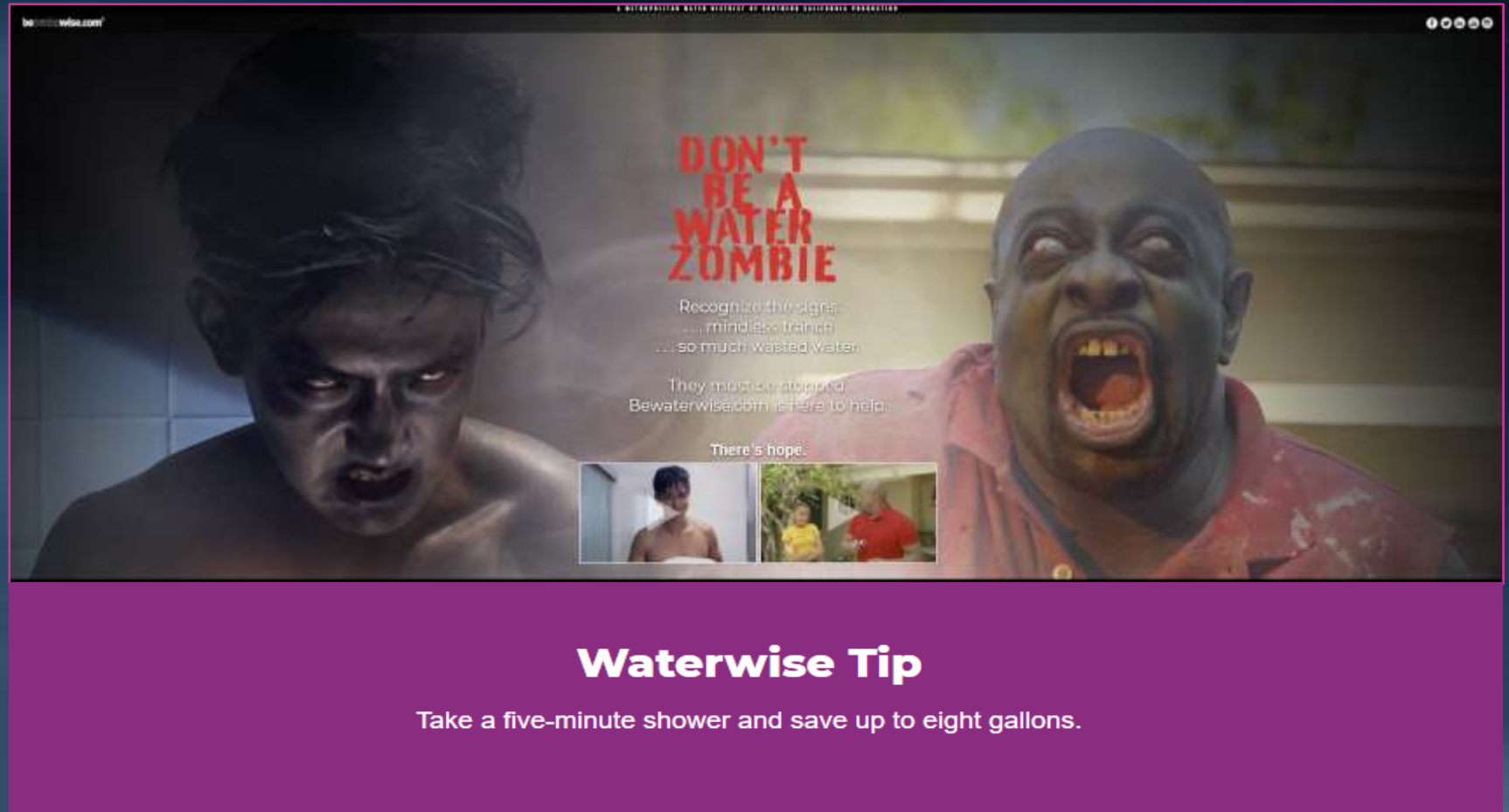
- La Opinion Heritage Month
- Co-branding with cities, agencies
- KFI AM 640 'Home with Dean Sharp'



Advertising and Outreach Campaign

Coordinated video releases in October, timed for seasonal theme and tied to water-saving tips

Advertising on YouTube with a target of 250k views



Conservation Advertising Budget

- FY 2020/21-2021/22 Board-approved conservation budget
 - Currently investing \$1 million for fall/winter campaign
- Proposed three-year campaign – not to exceed \$10.5 million
 - Up to additional \$3.5 million in spring/summer 2022 (from current board-approved conservation budget)
 - Proposed \$7 million in FY 2022/23 and FY 2023/24 Continuance of contract in second and third years is dependent upon Board approval of funding in biennial budget

Benefits of Using Media Buying Firm

Negotiate to
Increase Buying
Power

Expanded
Multi-media
Opportunities

Verify and Track
Advertising
Placements

Added Value,
Make-Goods on
Media Buys



Next Steps



Input from Board

C&L Committee Presentation and
incorporate board feedback in
(early October)

Issue Request for Proposals

Work with Business Outreach to
Ensure Broad Distribution of RFP
(late October)

Review and Score Proposals

Staff to interview top firms for
experience, value
(December 2021-January 2022)

Award Contract

Return to Board in early 2022 with
recommendation to award contract
for media placement service





Department Head Performance Evaluations

Board of Directors
Item 10-1
October 12, 2021

Overview

1. How Evaluation Process Works
2. Evaluation Process Timeline
3. *Closed Session Presentations*

How the Evaluation Process Works

- Email sent to Directors on July 8 & 13, 2021 ***FY2020-21 Department Head Evaluations Due***
 - Includes Year-End Accomplishment Summaries and Weblinks to Evaluations for each Department Head
- Reminder Email also sent 8:00 AM yesterday: ***FY2020-21 Department Head Evaluations Due***
- Two weeks left to complete online evaluations
- Submit by ***Tuesday, October 26, 2021***
- *Full Board participation encouraged*
 - *Optional for new Directors on the Board less than 4 months*

II. Evaluation Timeline

Dept Heads
Send Year-End
Performance
Summaries to HR

July 7

Performance
Summaries and links
to Evaluations sent
to the Board

July 8 – 9

Dept Head
Presentations to
Board (Closed)

Oct 12

Online Evaluations
Submitted, *Due by
October 26*

Oct 12 – Oct 26

Evaluation Results
Sent to the Board

Nov 4 – 5

Board Discusses
Evaluation Results
(Closed)

Nov 9 Board

Review Salary
Comparisons

Nov 9 Board

Board Finalizes
Compensation
Determinations

Nov 9 Board

Dept Heads Draft
Next Year's Goals
Based on Feedback

Nov - Dec

Home Committees
Approve Goals
(Closed)

Nov – Dec

Four Key Areas, with 20 Core Ratings

STANDARD 1 - 5 RATING SCALE

1 = To a Very Little Extent to 5 = To A Very Great Extent (or N/A)

Strategic Leadership	1. Align Priorities with Mission and Board	2. Provide Proactive Insights	3. Prepare Organization for Future Challenges
	4. Project Positive Image of Metropolitan		
Operational Leadership	5. Ensure Department Adds Value	6. Provide Innovative Solutions	7. Meet Assigned Timeframes
	8. Improve MWD Operations		
Board Relationships	9. Excellent Board Working Relationships	11. Develop Strategic Plans with Board	11. Develop Strategic Plans with Board
	12. Open to Constructive Suggestions	14. Available to Board Members	14. Available to Board Members
Results	15. Make Progress on Board Expectations	16. Achieve Expected Results	17. Ensure Compliance
	18. Effectively Manage Budgets	19. Evidence a Strong Commitment to Diversity	20. Work Effectively w/ Other Departments
+		Overall Performance Rating	Opportunities for Specific Written Comments

Overall Rating Descriptions

- ***Exemplary Performance***
 - Consistently achieves exemplary performance that SIGNIFICANTLY CONTRIBUTES to organizational results.
- ***Highly Competent Performance***
 - Strong performer. Achieves excellent results on vast majority of assignments and all priority objectives.
- **Competent Performance**
 - Solid performer. Achieves good results on most assignments and deadlines.
- **Unsatisfactory Performance**
 - Performance does not meet the minimum expectations of this position.

Other Information to Know

- Opportunities to provide specific feedback on desired improvements
- Participation is tracked, but individual responses are anonymous to Metropolitan
- Email confirmation of your responses upon submission
- Reminder emails will be sent from Office of the Board
- For questions or support contact Irwin Jankovic or Diane Pitman

Department Head Presentations

- To be heard in Closed Session

