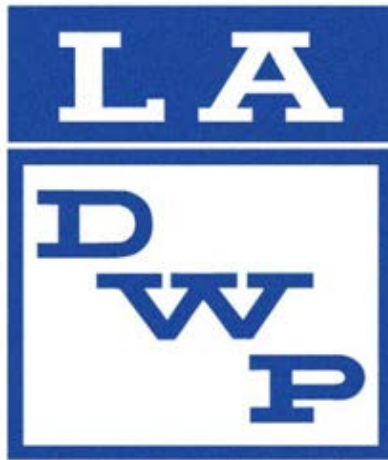


**Initial Study
for the
Scattergood Generating Station
Units 1 and 2 Repowering Project**



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

OCTOBER 2016

**INITIAL STUDY
FOR THE SCATTERGOOD GENERATING STATION UNITS 1 AND 2 REPOWERING
PROJECT**

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ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
AMSL	Above mean sea level
APE	Area of Potential Effect
AQMP	Air Quality Management Plan
BMP	Best Management Practices
CAAQS	California Ambient Air Quality Standards
CARB	California Air Resources Board
CCA	California Coastal Act
CCGS	Combined cycle generation system
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CNDDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CRPR	California Rare Plant Rank
CO	Carbon Monoxide
CRHR	California Register of Historical Resources
CTG	Combustion turbine generator
dBA	decibel, A-weighted scale
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
EPA	U.S. Environmental Protection Agency
ESBB	El Segundo Blue butterfly
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Administration
FMMP	Farmland Mapping and Monitoring Program
GHG	Greenhouse gas
HRA	Health risk assessment
HRSG	Heat Recovery Steam Generator
kV	Kilovolt
LADWP	Los Angeles Department of Water and Power
LAX	Los Angeles International Airport
MW	Megawatt
NAAQS	National Ambient Air Quality Standards

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NAHC	Native American Heritage Commission
NO ₂	Nitrogen Dioxide
NO _x	Nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NSR	New Source Review
O ₃	Ozone
OHP	California State Office of Historic Preservation
OTC	Once-through cooling
PM ₁₀	Suspended particulate matter
PM _{2.5}	Fine particulate matter
RCRA	Resource Conservation and Recovery Act
RECLAIM	Regional Clean Air Incentives Market
RWQCB	California Regional Water Quality Control Board
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coast Information Center
SCGS	Simple cycle generation system
SCR	Selective catalytic reduction
SGS	Scattergood Generating Station
SO ₂	Sulfur dioxide
SO _x	Sulfur oxides
STG	Steam turbine generators
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic air contaminant
USFWS	United States Fish and Wildlife Service
VOC	Volatile Organic Compound

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1 INTRODUCTION

1.1 Overview

The Los Angeles Department of Water and Power (LADWP) proposes to remove from service generating Units 1 and 2 at Scattergood Generating Station (SGS) and replace their generating capacity with a natural gas-fired combustion turbine generator (CTG) and a steam turbine generator (STG) operating in tandem to substantially increase efficiency in relation to fuel consumption and power production (proposed project). This type of generation technology is known as a combined cycle generation system (CCGS). This project continues LADWP's program of "repowering" existing power generation plants in response to state and local regulatory programs that encourage the phasing out of older inefficient steam boiler generation units and that mandate discontinuing the use of ocean water for cooling power generation facilities.

SGS is located in the City of Los Angeles community of Playa Del Rey. The existing SGS Units 1 and 2 generate electricity via natural gas-fired steam boiler generators. They have a combined permitted generating capacity of 297 megawatts (MW), 112 MW for Unit 1 and 185 MW for Unit 2. The capacity for Unit 1 includes derating (a permanent lowering of the generation capacity) implemented as a result of the previous Unit 3 Repowering Project at SGS. The proposed replacement generation units would have a capacity of up to 346 MW. Accordingly, the proposed project would result in an up to 49 MW increase in capacity compared to the existing units being replaced.

The proposed project is being implemented to replace LADWP's aging generation facilities with more reliable, responsive, and efficient combined cycle generation technology and to meet the state's goal of eliminating the use of ocean water for cooling coastal power plants. Previously, the program for repowering of LADWP's generation facilities in the South Coast Air Basin (SCAB) was established by a formal Settlement Agreement (May 2003) between LADWP and the South Coast Air Quality Management District (SCAQMD) to reduce air pollutant emissions from stationary sources in the SCAB under the provisions of the Regional Clean Air Incentives Market (RECLAIM) program. The repowering of SGS Units 1 and 2 was a component of the original Settlement Agreement but was subsequently replaced by the repowering of SGS Unit 3, the construction of which has recently been completed. The proposed Units 1 and 2 repowering is therefore no longer mandated under the Settlement Agreement. Nonetheless, the repowering will achieve the same goals as the RECLAIM program by substantially improving generation efficiency and thereby reducing air pollutant emissions.

Additionally, the proposed project incorporates a 10-MW pilot battery energy storage component. This battery energy system would store electricity generated during low demand

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periods that can be used later to support peak electricity demand, reducing reliance on electrical generation using gas combustion during these high demand periods.

Furthermore, the proposed repowering would also eliminate the use of ocean water for once-through cooling at SGS to comply state policy aimed at minimizing impacts to aquatic life as established under provisions of the federal Clean Water Act, Section 316(b). The proposed project would phase-out ocean water cooling at SGS ahead of the compliance schedule established by the State Water Resources Control Board (SWRCB). This early compliance is necessary to allow LADWP to maintain the schedule for the complete phase-out of ocean water cooling at all its coastal power plants by the mandated 2028 deadline established by the state.

1.2 California Environmental Quality Act Project Documentation

The construction and operation of the proposed SGS Units 1 and 2 Repowering Project constitutes a project as defined by the California Environmental Quality Act (CEQA; California Public Resources Code §§21000 et seq.). LADWP, a public municipal utility, will fund, implement, and operate the proposed project, and therefore, is the lead agency for purposes of CEQA compliance. Pursuant to the Warren-Alquist Act, the California Energy Commission would not be the lead agency or a responsible agency for this project because the project would result in less than a 50 MW net increase in generating capacity at SGS.

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

As discussed above, the proposed project would comply with state policy to cease the utilization of ocean water for power plant cooling, and it would implement dry cooling technology. The environmental impacts of discontinuing ocean water cooling are considered beneficial, which is a purpose of the state's once-through ocean water cooling phase-out policy. The final disposition of the ocean water cooling facilities (that is, the intake and outfall lines in the ocean and the circulating water structure on the beach) would be subject to regulatory oversight and approval by agencies that would not have approval authority over the actual generation unit repowering project. These agencies may include the California State Lands Commission, California Department of Parks and Recreation, California Coastal Commission, and US Army Corps of Engineers. LADWP will consult with these agencies about alternatives related to the final disposition of the ocean water intake and outfall facilities and the potential environmental

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impacts of such alternatives. The alternatives for final disposition of the intake and outfall facilities will be addressed via a separate CEQA environmental document. Therefore, this current Initial Study does not, and the ensuing EIR will not, address the final disposition of the intake structure and the intake and outfall lines.

Regarding the future CEQA process related to the final disposition of the ocean water cooling facilities, the cessation of ocean water cooling at SGS cannot occur until after the proposed repowering project is completed and Units 1 and 2 have been removed from service. It is anticipated that the removal of Units 1 and 2 from service (and, therefore, the cessation of ocean water cooling) would occur in early 2021. Potentially extensive studies and surveys of the marine environment surrounding the cooling system intake and outfall facilities may be required to evaluate the environmental impacts of various alternatives for the final disposition of these facilities. These studies would be conducted and the necessary CEQA documentation would be completed prior to the removal from service of Units 1 and 2. By separating this analysis from the generation unit repowering and addressing the repowering as an action under CEQA distinct from the final disposition of the ocean-water cooling facilities, the cessation of ocean water cooling at SGS at the earliest possible date would be facilitated. Because the repowering project would not influence the final determination regarding the ocean water cooling facilities and because any activities associated with the final disposition of the facilities could occur only after implementation of the repowering project, no cumulatively considerable environmental impacts are expected to result related to the effects of the repowering project and the final disposition of the cooling facilities.

In 2001, SCAQMD (as the lead agency) certified an EIR for installation of pollution abatement equipment pursuant to RECLAIM at three LADWP power plants, one of which was SGS. In addition to installation of Selective Catalytic Reduction (SCR) systems on all existing units at SGS, the EIR addressed construction of a new ammonia storage facility. The 2001 SCAQMD EIR is incorporated herein by reference.

In August 2012, LADWP (as the lead agency) certified the Final EIR for the repowering of SGS Unit 3. The Final EIR addressed replacing existing Unit 3 with a combination of a CCGS and two simple cycle generation systems (SCGS) consisting of high-efficiency natural gas-fired CTGs. The Unit 3 repowering maintained the total gross generating capacity of the SGS at 830 MW. The 2012 LADWP Unit 3 Repowering EIR is incorporated herein by reference.

1.3 Project Location

SGS is located at 12700 Vista Del Mar in the City of Los Angeles (community of Playa Del Rey). It is adjacent to the Pacific Ocean and approximately 1 mile south of Los Angeles

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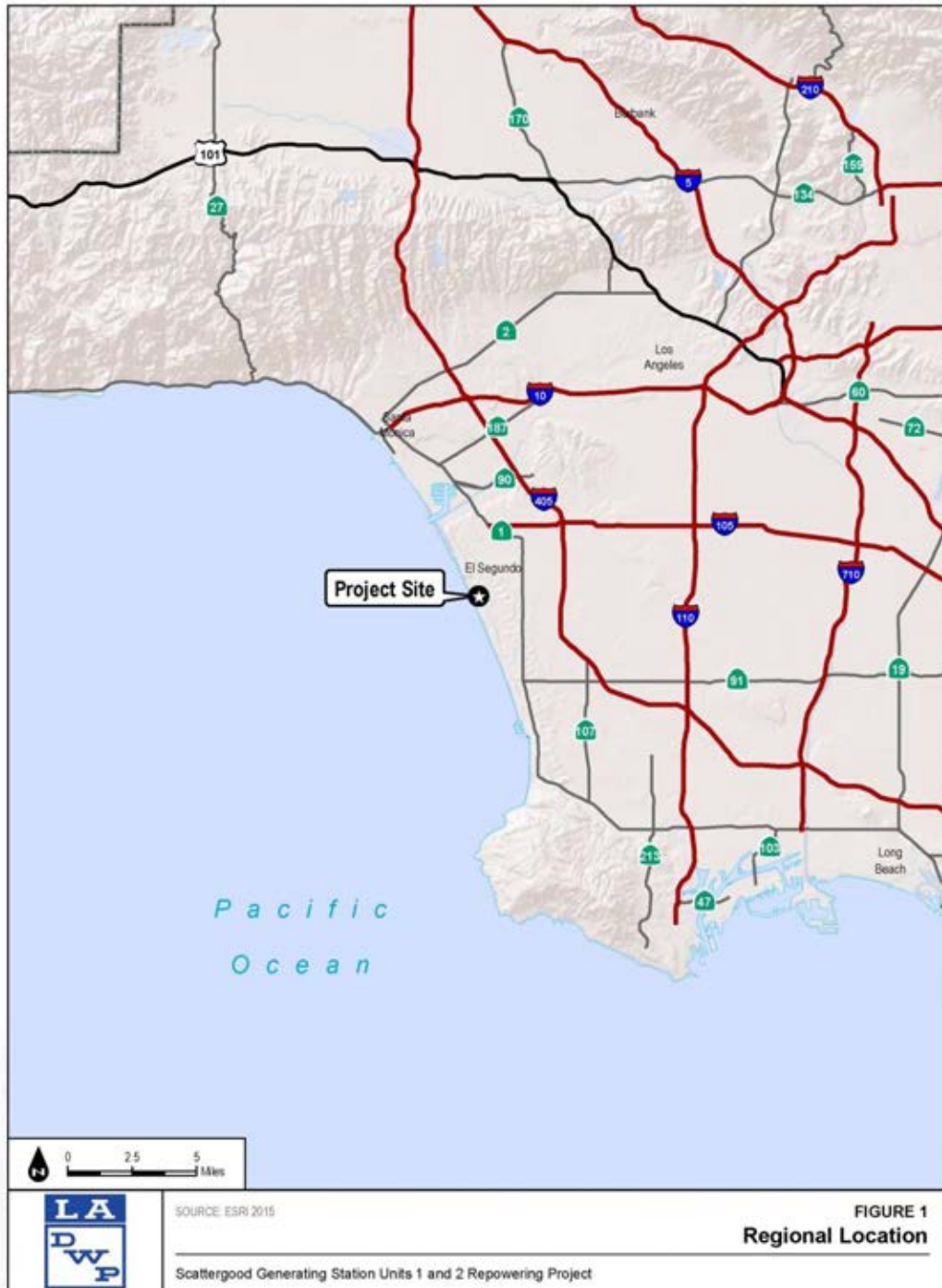
International Airport (LAX). The facility is located on approximately 56 acres that is bounded on the west by Vista Del Mar and Dockweiler State Beach. The City of Los Angeles' Hyperion Wastewater Treatment Plant is adjacent to SGS on the north. The City of El Segundo borders SGS on the south, east, and northeast. Residential neighborhoods are located adjacent to SGS to the northeast and east, and the Chevron El Segundo refinery is adjacent to the south. Additional uses within one-half mile of the site include a preschool, an elementary school, a middle school, commercial uses, and three public parks. Another electric generating plant, the NRG El Segundo Energy Center, is located approximately one-half mile south of the SGS site. Grand Avenue, which runs east-west, divides the SGS property north and south; all the active generation and generation support facilities are located north of Grand Avenue. Figure 1 illustrates the location of the SGS in relation to the greater Los Angeles region.

The natural gas used at the facility is supplied by continuous feed from a dedicated pipeline that enters the SGS property from the south via Grand Avenue. A pressure reducing station is located near the Grand Avenue entrance. Compression equipment is located near each generation unit to ensure optimum pressure of the gas prior to combustion. Water used during the generation process is stored in three tanks at the eastern end of the property.

The southeastern portion of the SGS property, across Grand Avenue from the main generation units, was recently used for construction administration, staging, and worker parking for the Unit 3 repowering project (see Section 1.4.2 for description of this project). This area was formerly a tank farm that stored fuel oil for the SGS. Three of the four tanks on this portion of the property were removed as part of the Unit 3 repowering project; one empty and cleaned tank remains. Excess soil from the Unit 3 repowering project construction activities is also being temporarily stockpiled on a portion of the SGS property south of Grand Avenue.

The electrical energy generated at SGS is sent to a switchyard located in the central portion of the SGS property, east of the generation units. Electrical energy is transmitted from the switchyard at 138 or 230 kV. A connection to the Scattergood-Olympic and Scattergood-Airport transmission lines allows the energy from the site to be delivered to the west side of the City of Los Angeles.

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In 2012, the repowering of SGS Unit 3 was approved by LADWP, and construction began early in 2013. The Unit 3 repowering project included the construction of one new CCGS and two new SCGSs on the existing SGS property, as shown on Figure 2. These new units were commissioned in December 2015. The CCGS was designed to replace primarily base load generating capacity and consists of one CTG (new Unit 4) and one STG (new Unit 5) operating in combination and producing about 321 MW. These units are located adjacent to and on the north side of the existing Units 1 and 2. The Unit 4 CTG is designed to operate on a mixture of compressed natural gas and air to produce an output of about 215 MW. Exhaust heat from the CTG is then captured in a Heat Recovery Steam Generator (HRSG) where it is used to produce steam to drive the Unit 5 STG. The STG has an output of about 106 MW. The CCGS incorporates low NO_x turbines, oxidation catalysts to control emissions of carbon monoxide, and SCR systems to further control NO_x.

In addition, two CTGs (Units 6 and 7) operating as SCGSs supply an additional 212 MW capacity (106 MW each), and provide the ability for LADWP to react quickly (in terms of start-ups, shut-downs, and ramp rates) to changes in demand for electrical energy, which also increases overall system efficiency. Units 6 and 7 were constructed on a terrace above and to the east of Units 1 and 2. These units incorporate water injection to control NO_x in the front end of the CTG, and the CTG exhaust is routed to an SCR system to reduce emissions.

Unit 3's former generating capacity of 460 MW was replaced by the 533 MW-capacity of the new units. The additional capacity of the new equipment (i.e., 73 MW) was offset by derating the generation capacity of Unit 1 by 73 MW, so that there would be no net increase in generating capacity at SGS due to the Unit 3 repowering project. A new power control building, electrical transformers, and switchyard modifications were also provided under the Unit 3 repowering.

The new generation facilities incorporate air cooling, which allows discontinuance of the use of ocean water for cooling associated with existing Unit 3. However, although the Unit 3 repowering eliminated the use of ocean water cooling for the new units, the existing once-through ocean water cooling system continues to be used for Units 1 and 2. There is one ocean-water intake structure for the entire SGS facility. Sea water is drawn into the cooling system through a 12-foot diameter submerged intake pipe originating about 1,600 feet offshore from the mean high tide line. Water is discharged from the generating station's cooling system through a single submerged 12-foot diameter outfall terminating about 1,200 feet offshore from the mean high tide line. The intake pipe has a velocity cap to reduce fish impingement and exclusionary bars to keep marine mammals from entering the intake. Both of these lines extend another 300 feet from the mean high tide line under the beach to the circulating water structure.

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Figure 2 SGS Existing Facilities



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The statewide *Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling*, also known as the once-through cooling (OTC) policy, was adopted in May 2010 and became effective October 1, 2010, in order to implement the federal Clean Water Act Section 316(b) standards regarding cooling water intake structures. LADWP is in the process of eliminating the use of ocean water for cooling generators at SGS, starting with the repowering of Unit 3. As discussed above, Units 1 and 2 would continue to utilize ocean water cooling until the proposed project is implemented and Units 1 and 2 are removed from service.

Unit 3 has been shut down and permanently removed from service. Demolition and dismantling of Unit 3 will take approximately 24 months to complete and is scheduled to occur from 2016 to the first quarter of 2018.

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2 PROJECT DESCRIPTION

2.1 Proposed Project Facilities and Construction

2.1.1 Introduction

As noted previously in Section 1.2, the proposed project addressed in this Initial Study includes only the repowering of electrical generation equipment to be provided on the SGS site located east of Vista Del Mar. There would be no construction activity west of Vista Del Mar. The project would provide for the cessation of use of the ocean water for power plant cooling. However, as discussed above, the ultimate disposition of the intake and outfall lines and the intake structure will be addressed through consultation with appropriate regulatory agencies and preparation of a separate CEQA document. The facilities to be assessed under the proposed repowering project are described below.

2.1.2 Generation Facilities

The proposed repowering of SGS Units 1 and 2 involves providing a CCGS similar to Units 4 and 5 constructed as part of the Unit 3 repowering. The proposed CCGS would replace the generating capacity of Units 1 and 2 and provide up to an additional 49 MW of capacity.

The proposed CCGS would be placed on the site now occupied by Unit 3, which is being demolished as part of the Unit 3 repowering project. It would include one CTG and one STG operating in combination and producing up to 346 MW. The new CTG (designated Unit 8) would operate on a mixture of compressed natural gas and air and would be capable of producing up to 232 MW of electrical power. The CTG would use an approved low NO_x combustor to control NO_x emissions. Exhaust heat from the CTG would be captured in an HRSG where it would be used to produce steam to drive an STG (designated Unit 9). The STG would be capable of producing up to 118 MW of electrical power. However, the maximum combined output of the CCGS will be limited to 346 MW. The CTG exhaust, while in the HRSG, would pass through an oxidation catalyst to control emissions of carbon monoxide and then pass through an SCR system to control NO_x. The CTG exhaust would continue to exit the HRSG and would be discharged to the atmosphere via a 213-foot tall (above ground level) exhaust stack. Steam exiting the STG would be condensed using a dry cooling system with electric powered fans (similar to the cooling system for Units 4 and 5). The cooling fans would be housed in a structure that is approximately 120 feet wide by 210 feet long, with a height of about 100 feet. The condensate from the cooling system would be pumped back to the HRSG to be converted into steam in a closed-loop system.

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Power generated by the proposed CCGS would be stepped up in voltage to 138 kV using separate existing generator step-up transformers. The transformers would be connected to the switch racks at the SGS switchyard, and the power would be delivered to the grid via the existing transmission lines.

2.1.3 Other Equipment and Operations

Battery Energy Storage System

A 10-MW pilot battery energy storage system connected to the SGS switchyard would be provided as part of the proposed project to help respond to peaks in demand for electricity. When charged, the battery system would be immediately available during the highest demand periods of the day to provide a source of power that produces no air-emissions, thus reducing the requirement to operate or ramp up the gas-combustion SCGSs at SGS to meet peak demand. The batteries would be recharged by the CCGSs and SCGSs (Units 4, 5, 6, 7, 8, and/or 9) during non-peak periods when demand is low. The availability of the battery storage would also allow for more efficient management of the generator units at SGS by leveling out the operation of the units while employing the battery system to very rapidly respond to peaks in demand as necessary. Based on the results of the pilot study, additional battery storage may be implemented at SGS in the future.

Ammonia Handling and Storage

As with current operations at SGS, aqueous ammonia (29 percent solution) would be used in the SCR systems of the proposed generators. Ammonia for the new equipment would be obtained from the existing ammonia storage system at SGS. Ammonia would be routed from the storage tanks to the CTG via new piping. No new ammonia storage facilities and no increase in the number or rate of deliveries of ammonia would be required since ammonia used for the new generation facilities would be offset by the reduction in ammonia use associated with removal from service of existing Units 1 and 2.

Wastewater Treatment and Disposal

Water that is used in the CCGS must be treated to remove undesirable constituents that could foul the cooling or pollution control equipment. This water purification process, as well as other minor industrial processes, would generate wastewater that would be collected and sent to Hyperion Wastewater Treatment Plant for treatment. The transfer of wastewater to Hyperion would require a new Industrial Waste permit issued by Los Angeles Bureau of Sanitation and a new or upgraded sanitary sewer line between the two facilities.

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Cooling System Components

Dry Cooling System - The proposed CCGS would be cooled utilizing a dry cooling system that includes a closed-loop water circulation system to transfer heat from the STG to the cooling system. The water would be cooled by fans that would draw air over the tubes containing the warm water, and the cooled water would then be pumped back to the HRSG.

In using dry cooling for the proposed generation units rather than ocean water cooling, the project would completely eliminate use of once-through ocean water cooling at SGS. As discussed above, the final disposition of the ocean-water cooling intake and outfall facilities will be determined through consultation with pertinent Responsible Agencies and a separate environmental analysis consistent with CEQA requirements.

Wet Cooling System – The heat from the closed-loop cooling water systems would be managed by installing a wet surface air cooler (WSAC) to lower the cooling water temperature used on auxiliary equipment. The WSAC for Units 8 and 9 would be constructed in the location of the current WSAC footprint for Unit 3.

Natural Gas System

Natural gas used to fuel the CCGS would be obtained from a new line tied into the existing Southern California Gas Company metering station located within the Scattergood property near the Grand Avenue entrance. Natural gas would be routed to a new gas compressor, where it would be compressed prior to use in the generating system. No new or upgraded off-site natural gas lines would be required for the proposed project.

Air Pollution Controls

The new CCGS would use a combination of processes to control air pollutant emissions. The combustors in the combustion turbines would use dry low NO_x burners to reduce emissions of NO_x. An SCR system also would be provided for the combustion turbine that would use a catalyst to facilitate a reaction between NO_x and aqueous ammonia to reduce NO_x emissions. The aqueous ammonia would be atomized with air and vaporized with an electric heater. The ammonia/air mixture would be blended within a static mixer and injected into the flue gas ahead of the catalyst bed via an injection grid. A carbon monoxide catalyst would also be installed to comply with the SCAQMD's New Source Review and Best Available Control Technology requirements.

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2.1.4 Construction

Construction of the proposed project is scheduled to begin the first quarter of 2018 and continue through the end of 2020. Construction would include start up and commissioning, which would occur during the last half of 2020. The duration of construction activities would be approximately 36 months and would normally take place 6 days per week, Monday through Saturday. Sunday shifts may also be required at times during the construction period, and two, 8-hour shifts per day may also be necessary at times, which would entail evening and nighttime construction activities. During peak project construction periods, several hundred workers would be present at the site on the same day.

Construction activities for the proposed project would include grading and site preparation, construction of equipment foundations, construction of the CCGS, construction of the dry cooling system, modification of the existing electrical switch yard, and system commissioning (testing and calibration prior to operations).

All required construction management, staging, storage, and lay-down areas related to project construction would be located within the existing SGS boundaries, including in the parcel south of Grand Avenue. The new generating system equipment would be brought to the site on trucks, and some oversize loads are anticipated. In addition, construction contractors and LADWP would require temporary trailers on site for construction planning and management activities.

A number of key site improvements would be required to accommodate the proposed project, including the construction of retaining walls and the placement of fill material to raise and level the pad for the CCGS. It is anticipated that the excavation stockpile temporarily stored on the southern portion of the SGS property would provide a portion of the fill for this purpose. The construction staging area on the southeastern portion of the SGS (i.e., south of Grand Avenue) will continue to function as a marshalling, construction contractor administration, and employee parking area, as it did during the Unit 3 repowering construction.

After construction of the new generating units and prior to producing electrical energy for distribution to the LADWP service area, the CCGS would undergo a comprehensive commissioning and testing program. The commissioning program includes testing, calibration, and synchronization of the CTG electrical and mechanical systems, water cycle chemistry commissioning, pre-operational cleaning and hydrotesting, and completing CCGS trial runs. The commissioning phase of the project would require approximately 3 to 4 months.

The final phase of construction involves decommissioning and site restoration. After the proposed CCGS is operational, Units 1 and 2 will be decommissioned by surrendering the

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operating permits (to SCAQMD) and securing the premises. The existing exhaust stack for Units 1 and 2 would then also be demolished.

Temporary construction staging areas, construction parking areas, and management trailers will be removed and any areas disturbed by grading or earth movement would be stabilized to protect against erosion and sedimentation. Restoration of these areas will be governed by approved Storm Water Pollution Prevention Plans.

A conceptual site plan showing the location of the proposed facilities at the site is provided in Figure 3.

2.2 Project Operations

2.2.1 Operating Personnel and Requirements

Once constructed, the proposed project would not require additional personnel beyond those currently employed at SGS (approximately 120) to support operations. The facility operates 24 hours per day, seven days per week. No changes to these operating parameters would occur under the proposed project.

2.2.2 Termination and Decommissioning

The estimated life of the new equipment at SGS is expected to be more than 30 years. Equipment that is no longer effective may then be decommissioned, replaced, or modified in accordance with applicable regulations, market conditions, and technology prevailing at the time of termination. Decommissioning of Units 8 and 9 in the future may involve a combination of salvage or disposal in accordance with applicable federal, state, and local regulations.

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2.3 Permits and Approvals

LADWP would secure the necessary regulatory permits to authorize construction and operation of the proposed project. The SCAQMD must issue permits in the form of the “authority to construct” and “permit to operate,” which regulate air emissions and operating parameters of the electric generating equipment. Changes to the SGS ocean cooling water discharge may require changes to the site’s National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board (SWRCB) and California Regional Water Quality Control Board, and would also require a new Industrial Waste permit from Bureau of Sanitation. A Statewide Storm water permit associated with construction activities will be obtained from the State Water Resources Control Board (SWRCB), as well as the general construction dewatering permit from the Regional Water Quality Control Board (RWQCB). During operations, stormwater handling will be designed in accordance with City of Los Angeles’ requirements, including consideration of Low Impact Development (LID) standards which require post-construction Best Management Practices (BMPs).

The project would be constructed and operated under various federal and state laws, some of which could require regulatory action by governmental agencies. For example, oversize loads on trucks require a transportation permit from the California Department of Transportation (Caltrans). Use and storage of hazardous materials on the site requires compliance with the Resource Conservation and Recovery Act under state and federal Environmental Protection Agencies. Discharges of storm water for construction sites in excess of one acre are regulated under a General Storm Water Construction Activities Permit issued by the SWRCB, with oversight by the RWQCB. Construction dewatering is regulated by the general construction dewatering permit issued and enforced by the RWQCB.

The circulating water structure on Dockweiler State Beach and the intake and outfall pipes on submerged lands are subject to lease agreements of the State Lands Commission and California Department of Parks and Recreation. Changes related to the cessation of ocean water once through cooling at SGS may be subject to regulation of State Lands Commission and California Department of Parks and Recreation, as well as the California Coastal Commission, RWQCB, and/or US Army Corps of Engineers. Since Units 1 and 2 will remain operational (including the once-through cooling system) until the replacement units are commissioned and operational, it is anticipated that the permits related to the final disposition of the intake and outfall system would be deferred until after 2020. As discussed above, LADWP intends to prepare a separate CEQA environmental document to fully evaluate potential issues and impacts involved with the final disposition of these facilities.

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Potential permits and approvals for the proposed project considered in the project EIR are as follows:

City of Los Angeles Department of Water and Power

- Certification by the Board of Commissioners that the EIR was prepared in accordance with CEQA
- Approval by the Board of Commissioners of the proposed project

South Coast Air Quality Management District

- Authority to Construct
- Permit to Operate
- Demolition permit for the Unit 1 and 2 Exhaust Stack
- Fugitive Dust Abatement Plan Approval (Rule 403)

State Water Resources Control Board and Los Angeles Regional Water Quality Control Board

- General Discharge Permit for construction dewatering and hydrostatic test water
- General Storm Water Permit Associated with Construction Activities
- Amendment of the NPDES Permit for wastewater treatment and disposal system modifications

Federal Aviation Agency

Notification pursuant to Title 14 Code of Federal Regulations (14 CFR part 77) for construction or alteration (demolition) of a structure affecting the National Airspace System.

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3 ENVIRONMENTAL CHECKLIST

CEQA Initial Study Form

The following discussion of potential environmental effects was completed in accordance with Section 15063(d)(3) of the CEQA Guidelines (2016) to determine if the proposed project may have a significant effect on the environment.

1. **Project title:** Scattergood Generating Station Units 1 and 2 Repowering Project

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

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

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

Julie Van Wagner
Environmental Project Manager
Los Angeles Department of Water and Power
(213) 367-5295

4. **Project Sponsor's Name and Address:**

Same as Lead Agency

5. **City Council District:**

11th District – Councilmember Mike Bonin

6. **Neighborhood Council:**

Westchester-Playa

7. **Project location:**

SGS is located at 12700 Vista Del Mar in the City of Los Angeles (community of Playa Del Rey). The facility is located on approximately 56 acres that is bounded to the north by the Hyperion Wastewater Treatment Plant, to the east by the City of El Segundo, to the south by the Chevron El Segundo Refinery, and to the west by Vista Del Mar and Dockweiler State Beach.

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8. General plan designation:

The SGS site has a general plan designation of Public Facilities.

9. Zoning:

The SGS site is zoned PF-1 (Public Facilities)

10. Description of project:

LADWP proposes to replace the generation capacity of SGS Units 1 and 2 with a natural gas-fired CTG and a STG. The proposed generating units would be air-cooled and would discontinue use of ocean water cooling at SGS. The new units would have a capacity of up to 346 MW, or 49 MW greater than the existing units they would replace. A 10-MW pilot battery energy storage system would also be provided at the site.

11. Surrounding land uses and setting:

Adjacent to the SGS property on the north is the City of Los Angeles' Hyperion Wastewater Treatment Plant. Bordering the site on the east are residential neighborhoods and commercial areas of the City of El Segundo. Intermixed in this area are several schools and public parks (the location of schools within one quarter mile of the project site is described in Section 3.8c of the Environmental Analysis, included below). The site is bordered to the south by the Chevron El Segundo refinery. Another electric generating plant, the NRG El Segundo Generating Station, is located approximately 0.5 miles south of the SGS site. Dockweiler State Beach is located immediately west of the site, across Vista Del Mar.

12. Agencies That May Have an Interest in the Proposed Project:

CEQA Lead Agency

City of Los Angeles Department of Water and Power

Responsible/Trustee Agencies

Los Angeles Regional Water Quality Control Board

South Coast Air Quality Management District

13. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3? If so, has consultation begun?

Yes. Consultation has begun.

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ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact,” as indicated by the checklists on the following pages.

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

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DETERMINATION

On the basis of this initial evaluation:

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

Charles C. Hallam
Signature

10/26/2016
Date

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ENVIRONMENTAL ANALYSIS

3.1 Aesthetics

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Potentially Significant Impact. The proposed project facilities would be located entirely within the existing 56-acre SGS site, which includes a number of existing large electrical generating units with exhaust stacks, an electrical switchyard and transmission towers, aboveground storage tanks, and other ancillary facilities that support the power generation function at the station. These facilities impart an entirely industrial character to the property. Surrounding and nearby uses, including the approximately 130-acre Hyperion Wastewater Treatment Plant (located immediately north of SGS along Vista Del Mar), the over one-square-mile Chevron oil refinery and oil storage facility (located immediately south of SGS along Vista Del Mar), and the NRG El Segundo Generating Station (located about 0.5 miles south of SGS along Vista Del Mar), further reinforce the industrial character of the area. However, in addition to these industrial uses, SGS is bounded along its eastern edge by residential neighborhoods and on the west by Dockweiler State Beach (across Vista Del Mar).

Scenic vistas generally refer to views of expansive open space areas or other natural features, such as mountains, undeveloped hillsides, large natural water bodies, or coastlines. Less commonly, certain urban settings or features, such as a striking or renowned skyline, may also represent a scenic vista. Under CEQA, scenic vistas also generally, although not exclusively, refer to views that are accessible to broader segments of the public, rather than those available to a limited number of private entities. The proposed project facilities would be sited adjacent to existing SGS generating facilities,

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and they would generally be visually similar in character and scale to and be located largely within the visual profile of the existing facilities. Furthermore, the SGS property rises in elevation from west to east by approximately 125 feet in a series of terraces, which tends to obscure some of the facilities located on lower terraces from viewpoints east of the station. Nonetheless, because the proposed project facilities would be visible from some residential properties located on the bluffs overlooking SGS and the Pacific Ocean and from Dockweiler State Beach, albeit within the context of the existing generating station, the potential effect of the proposed project on scenic vistas as seen from adjacent and nearby viewpoints will be further analyzed in the EIR.

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

No Impact. There are no officially designated or eligible state scenic highways or local scenic routes (as designated by either the City of Los Angeles or the City of El Segundo) within the vicinity of SGS. As such, no impact would occur, and this issue will not be further analyzed in the EIR.

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

Less Than Significant Impact. The proposed project facilities would be located entirely within the existing 56-acre SGS site, which, as discussed above, includes existing electrical generating units, an electrical switchyard and transmission towers, aboveground storage tanks, and other ancillary facilities that support the power generation function at the station. These facilities impart an entirely industrial character to the property. Surrounding and nearby uses include the Hyperion Wastewater Treatment Plant, the Chevron oil refinery and storage facility, and the NRG El Segundo Generating Station, all of which further reinforce the industrial character of the area. The proposed project facilities would be sited adjacent to existing SGS generation or generation support facilities and on the site of the existing generation Unit 3. They would generally be visually similar in character and scale to and be located largely within the visual profile of the existing facilities. Given the nature and context of the proposed project facilities, they would not substantially degrade the existing visual character or quality of the site or its surroundings. As such, impacts would be less than significant, and this issue will not be further analyzed in the EIR.

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

Less Than Significant Impact. The proposed generating units and dry cooling structures would require lighting similar to that on the existing SGS facilities, which is required for the safety of personnel working at the facility at night, for security of the installation, and as a warning to aircraft in relation to tall structures at the station. Based on the existing level of lighting at the station and the scale of the proposed project facilities compared with the existing facilities, new lighting associated with the project would not be expected to adversely affect nighttime views in the area. The materials used in the construction of the new generating units would not be expected to add a new source of glare at the facility.

It is anticipated that construction activity for the proposed project would, at times, occur at night, creating a new source of light at the site. This impact would be temporary, related to only the construction phase of the proposed project. Based on the distance of the construction sites from residences adjacent to or near SGS, the elevational differences between the construction sites and the residences, and the ability to direct light away from the residential uses, construction related lighting would not be expected to adversely affect nighttime views in the area. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

References

- State of California Department of Transportation, District 7 Scenic Highway Designation, 2011. http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm , Accessed March 2016.
- City of Los Angeles Scenic Highway Map, 2011, http://egis3.lacounty.gov/dataportal/2011/02/09/scenic-highways/scenic_hwy. Accessed March 2016.
- City of El Segundo General Plan, Circulation Element. 2004.

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3.2 Agriculture and Forestry Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input 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"/>

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

No Impact. The proposed project would be located at the site of the existing SGS, which is occupied by facilities used for the production and transmission of electricity. The SGS does not contain land that is designated as Farmland, as mapped by the Farmland Mapping and Monitoring Program (FMMP 2015). As such, no impact would occur, and this issue will not be further analyzed in the EIR.

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

No Impact. The proposed project would be located on land that has general plan and zoning designations of Public Facilities (City of Los Angeles 2015). No portion of the site is currently used for agricultural purposes or is encumbered by a Williamson Act

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contract (California Department of Conservation 2013). As such, no impact would occur, and this issue will not be further analyzed in the EIR.

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

No Impact. The proposed project would be located at the site of the existing SGS, which is occupied by facilities used for the production and transmission of electricity. The project site does not support native tree cover or timber resources and is not considered forest land, timberland, or a timberland production zone as defined in the California Public Resources Code or Government Code. As such, no impact would occur, and this issue will not be further analyzed in the EIR.

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

No Impact. As described under Section 3.2(c), the project site does not contain forest land. As such, no impact would occur, and this issue will not be further analyzed in the EIR.

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

No Impact. There is no Farmland or forest land within the SGS or on adjacent parcels. While the proposed project would result in a minor increase in the generation capacity of SGS, this generation capacity would serve existing and already projected demand and thus would not contribute to growth that may lead to the conversion of Farmland or forest land. Therefore, there would be no potential for construction or operation of the proposed project to convert Farmland to non-agricultural use or forest land to non-forest use, either directly or indirectly. As such, no impact would occur, and this issue will not be further analyzed in the EIR.

References

California Department of Conservation. 2013. *Los Angeles County Williamson Act FY 2012/2013*. [map]. 1:120,000. Sacramento, CA: California Department of Conservation, Division of Land Resource Protection. 2013. Accessed November 11, 2015. <http://www.consrv.ca.gov/dlrp/lca/Pages/Index.aspx>.

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City of Los Angeles. 2015. "Zoning Information and Map Access System (ZIMAS)." Accessed November 11, 2015. <http://zimas.lacity.org/>.

Farmland Mapping and Monitoring Program. 2015. *Los Angeles County Important Farmland 2012*. [map]. 1:120,000. Sacramento, CA: Farmland Mapping and Monitoring Program. January 2015. Accessed November 11, 2015. <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2012/>.

3.3 Air Quality

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

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

Potentially Significant Impact. The proposed project is located in the South Coast Air Basin (SCAB), which is under the jurisdiction of the SCAQMD. The most recent applicable air quality plan is the SCAQMD 2012 Air Quality Management Plan (AQMP), which includes reduction and control measures that are outlined to mitigate emissions based on existing and projected land use and development. The SCAQMD has established criteria for determining consistency with the 2012 AQMP in Chapter 12, Sections 12.2 and 12.3 of the SCAQMD *CEQA Air Quality Handbook* (SCAQMD 1993). The criteria are:

- **Consistency Criterion No. 1:** The proposed project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to

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new violations, or delay the timely attainment of air quality standards of the interim emissions reductions specified in the AQMP.

- **Consistency Criterion No. 2:** The proposed project will not exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

While it is not anticipated that the project would conflict with or obstruct implementation of the AQMP, the EIR will evaluate the project's consistency with the SCAQMD 2012 AQMP based on the SCAQMD guidance.

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

Potentially Significant Impact. The proposed project would be required to comply with all relevant federal, state, and local air quality regulations, including acquisition of a permit to construct, permit to operate, and permit for demolition from SCAQMD. Nonetheless, construction of the proposed project would generate short-term criteria air pollutant emissions associated with entrained dust (earth movement), architectural coatings, asphalt pavement application, and internal combustion engines used by on-site construction equipment and from off-site worker vehicles and truck trips. Criteria air pollutants associated with construction of the proposed project include volatile organic compounds (VOCs), oxides of nitrogen (NO_x), carbon monoxide (CO), sulfur oxides (SO_x), particulate matter with an aerodynamic diameter equal to or less than 10 microns (PM₁₀), and particulate matter with an aerodynamic diameter equal to or less than 2.5 microns (PM_{2.5}). Activities that would generate air pollutant emissions include mobilization, site preparation, erection of facilities, workforce travel, construction material transport, and system startup and commissioning. Project-generated maximum daily construction emissions would potentially exceed the SCAQMD regional daily construction emissions significance thresholds and localized significance thresholds. Construction activities would be short-term in nature and would not add to long-term air quality degradation; however, the impacts, while temporary, would be potentially significant and will be analyzed further in the EIR.

Operation of the proposed facilities would also generate VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5} emissions. These emissions will be quantified in the EIR and compared to existing emissions under baseline conditions. Other considerations, such as exhaust stack plume dispersion, evaluation of state and federal ambient air quality standards, and potential health risk factors from toxic air contaminants, will be addressed in the EIR for purposes

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of substantiating permit compliance and evaluating consistency with air quality standards and regulations.

- c) *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?*

Potentially Significant Impact. An area is designated as nonattainment when it is not in compliance with the National Ambient Air Quality Standards (NAAQS) and/or the California Ambient Air Quality Standards (CAAQS). The SCAB is designated as a nonattainment area for federal and state ozone (O₃) standards, and federal and state PM_{2.5} standards. The SCAB is designated as a nonattainment area for state PM₁₀ standards; however, it is designated as an attainment area for federal PM₁₀ standards. The SCAB is designated as an attainment area for federal and state CO standards, federal and state NO₂ standards, and federal and state SO₂ standards. While the SCAB has been designated as nonattainment for the federal rolling 3-month average lead standard, it is designated attainment for the state lead standard (EPA 2015; CARB 2014).

If a project's emissions would exceed the SCAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution to nonattainment status in the SCAB. If a project does not exceed thresholds and is determined to have less-than-significant project-specific impacts, it may still contribute to a significant cumulative impact on air quality. The basis for analyzing the project's cumulatively considerable contribution is if the project's contribution accounts for a significant proportion of the cumulative total emissions (i.e., it represents a "cumulatively considerable contribution" to the cumulative air quality impact) as well as consistency with the SCAQMD 2012 AQMP, which addresses the cumulative emissions in the SCAB.

Criteria air pollutant emissions that would result from construction and operation of the proposed project will be quantified as part of the EIR. This analysis will evaluate whether the proposed project would result in a cumulatively considerable net increase in criteria air pollutants for which the SCAB has been designated nonattainment.

One objective of the project is to reduce air pollutant emissions related to the generation of electrical energy. In order to assess the achievement of this objective, the combustion emissions generated from project operations will be analyzed in the EIR in conjunction with the removal from service of Units 1 and 2 to determine whether the project's net emissions would create potentially significant adverse air quality impacts.

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

Potentially Significant Impact. Exhaust from construction equipment and vehicles as well as exhaust gases emitted from the stacks of the proposed combustion turbine would release air pollutants to the atmosphere. To determine the potential for exposure of sensitive receptors in the vicinity of the site to the project's generated air pollutants, the EIR will include a health risk assessment (HRA), which will focus on evaluating impacts due to emissions of toxic air contaminants (TACs). The HRA will quantify the concentration of TACs to which receptors in the project vicinity could be exposed during construction and operations. Health risk impacts that will be evaluated in the EIR include cancer risk and non-cancer acute and chronic health hazards. Potential health risks to sensitive receptors will be evaluated using the most recent health risk assessment guidelines and methodology published by the California Office of Environmental Health and Hazard Assessment and SCAQMD policies. The EIR will also include a pollutant dispersion analysis to determine potential pollutant concentrations downwind of the exhaust stacks. The EIR will use refined air dispersion modeling analysis that includes the use of local meteorological and terrain data to estimate air concentrations in the project vicinity.

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

Less Than Significant Impact. It is possible that odors characteristic of construction activities would be detected on properties surrounding the project site. Such odors would include diesel exhaust, petroleum products used in motor vehicles, freshly graded earth, and architectural coatings. Because these odors would be temporary and would be relatively mild by the time they reach nearby off-site receptors, construction-related odor impacts would be less than significant.

It is also possible that odors associated with some operations could be detected on properties surrounding the project site. Use of natural gas, diesel fuel, and architectural coatings may be detected on properties surrounding the site. However, use of these substances would be consistent with the existing operations and would be subject to various laws and regulations regarding storage and use. Any such odors generally would be no more impactful than what is experienced under current operations and would not affect a substantial number of people. As such, impacts would be less than significant, and this issue will not be further analyzed in the EIR.

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References

CARB. 2014. "Area Designation Maps/State and National." Last updated August 22, 2014.
<http://www.arb.ca.gov/desig/adm/adm.htm>.

EPA. 2015. "Region 9: Air Quality Analysis, Air Quality Maps." Last updated October 13, 2015.
<http://www.epa.gov/region9/air/maps/>.

SCAQMD (South Coast Air Quality Management District). 1993. *CEQA Air Quality Handbook*.

3.4 Biological Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" 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"/>

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

Less Than Significant Impact. The existing project site is fully developed for power generation and contains very little vegetation. The vast majority of the site is paved over with either concrete or asphalt. Small patches of ruderal vegetation and ornamental trees exist on the fringes of the site. Maintenance activities on the property include vegetation control. There are no streams, watercourses, or other waters on the site that are subject to regulation by state or federal agencies with jurisdiction. As such, there is little potential for special-status species to occur on the site and to therefore be affected by the proposed project. However, environmental analyses for previous projects taking place at the SGS property have evaluated the potential for the presence of a variety of special-status species, mostly due to the property's proximity to the coast and to the Chevron El Segundo blue butterfly preserve. These previous environmental analyses as well as regional data bases were consulted to determine whether the currently proposed project would have the potential to affect any special-status species that may occur in the areas near the SGS property. The previous analyses that were reviewed consist of the 2001 SCAQMD EIR and the 2012 LADWP Unit 3 Repowering EIR. The regional databases that were reviewed consist of the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB) and the California Native Plant Society (CNPS) Inventory (CDFW 2015a; CNPS 2015).

Based on a search of the CNDDDB, there are four special-status plant species that have occurred in the project area in the past (CDFW 2015a). The plant species are beach spectaclepod (*Dithyrea maritima*; State Threatened and California Rare Plant Rank [CRPR] 1B.1), Brand's star phacelia (*Phacelia stellaris*; CRPR 1B.1), coastal dunes milk-vetch (*Astragalus tener* var. *titi*; state and federal Endangered and CRPR 1B.1), and Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*; CRPR 1B.1) (CDFW 2015a). CNDDDB indicates that beach spectaclepod, Brand's star phacelia, and coastal dunes milk-vetch are believed to be extirpated in the project area. Coulter's goldfield is an annual herb that usually occurs in wetlands and is associated with salt marshes, swamps, playas, vernal pools, and coastal habitats. The exact location of the documented occurrence for Coulter's goldfield dates back to 1930 and is thought to have occurred along the El Segundo coastline. However, based on the conditions at the project site, which would not support Coulter's goldfield, no impacts would occur from the construction and operation of the proposed project (CDFW 2015a). Furthermore, the project site contains no natural

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land cover or other significant biological resources. As such, the proposed project would not adversely affect these species.

Pacific pocket mouse (*Perognathus longimembris pacificus*; federally Endangered and California Species of Special Concern) was the only special-status mammal documented within a one-mile radius of the project site (CDFW 2015a). This species was documented within the Marina del Rey and El Segundo area in 1938. However, according to CNDDB, this species is believed to be extirpated in the project vicinity (CDFW 2015a). Additionally, the project site does not contain sandy substrates, including coastal dunes, river alluvium, and coastal sage scrub habitat suitable to support this species. Thus, the proposed project would not adversely affect this species.

A number of special-status bird species have been observed and/or are known to exist adjacent to SGS, based on the facility's near-shore location. These include the western snowy plover (*Charadrius alexandrinus nivosus*; federally Threatened and California Species of Special Concern), which has the potential to winter on the beach adjacent to SGS, and the California least tern (*Sterna antillarum browni*; State and federally Endangered and California Fully Protected), which has the potential to nest on the beach roughly adjacent to SGS (CDFW 2015a). USFWS federally designated Critical Habitat (Subunit CA 45C: Dockweiler South, Los Angeles County, CA) for the Pacific Coast population of the western snowy plover occurs across Vista Del Mar from SGS on the beach (USFWS 2015). The project site does not contain physical or biological features (i.e., wide sandy beach with occasional surf-cast wrack supporting small invertebrates) that are essential to support this species. Additionally, no construction activity would occur west of Vista Del Mar; therefore, no direct impacts to wintering and/or nesting western snowy plover or California least tern would occur. Any potential indirect impacts involving lighting, noise, and human activity would be generally consistent with existing conditions during both construction and operation. Given the existing industrial operations, the proposed project would not substantially contribute to any potential disturbances to these species.

Several special-status species of insects have been observed in the vicinity of SGS, including Lange's El Segundo dune weevil (*Onychobaris langei*), Dorothy's El Segundo dune weevil (*Trigonoscuta dorothea dorothea*), Belkin's dune tabanid fly (*Brennania belkini*), Crotch bumble bee (*Bombus crotchii*), and Henne's eucosman moth (*Eucosma hennei*), all CDFW special animals (CDFW 2015a). None of these species is expected to occur on the SGS site because suitable habitats for the proliferation of these species were not present as of the 2001 biological resources studies (SCAQMD 2001), and no suitable habitats have been established since 2001.

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Several CDFW special-status beetle species have been identified as potentially occurring in the vicinity of SGS (SCAQMD 2001). These include sandy beach tiger beetle (*Cicindela hirticollis grvida*), which is found in areas adjacent to non-brackish water along the coast, and the senile tiger beetle (*Cicindela senilis frosti*), which is found in a salt marsh environment. In addition, the globose dune beetle (*Coelus globosus*), found in coastal sand dunes and dune vegetation, may occur in the area of SGS. None of these species of beetle are expected on SGS due to lack of suitable habitat. Furthermore, CNDDDB indicates that sandy beach tiger beetle and senile tiger beetle are likely extirpated from the project vicinity (CDFW 2015a).

The potential for the federally endangered El Segundo blue butterfly (*Euphilotes battoides allyni*) (ESBB) to occur on areas within or near the SGS property was evaluated in the 2012 LADWP Unit 3 Repowering EIR. As stated in that document, the SGS property is bordered to the south by the Chevron El Segundo refinery. Approximately two acres of the Chevron El Segundo refinery are designated as a habitat preserve for the ESBB. The ESBB spends virtually its entire life cycle in intimate association with the flower heads of one particular native plant found along coastal dunes, the seaciff or coast buckwheat (*Eriogonum parviflorum*). As part of the 2012 LADWP Unit 3 Repowering EIR, a habitat assessment was conducted in the southeastern portion of the SGS property (south of Grand Avenue) and several areas surrounding the SGS property to determine if the proposed project would impact ESBB or its habitat. The findings of the habitat assessment were based on the presence or absence of the coast buckwheat on the survey sites, due to the close association of the ESBB lifecycle with coast buckwheat. It was determined that none of the survey areas contained any habitat that would be considered suitable for the ESBB. Furthermore, it was determined to be unlikely that any ESBB would fly from the Chevron refinery habitat preserve into SGS property south of Grand due to the lack of host plants on the SGS property and due to a barrier of acacia trees separating part of the preserve from the SGS property. For these reasons, ESBB do not occur on the project site. As such, the proposed project would not adversely affect the ESBB (LADWP 2012).

For the reasons described above, there are no significant biological resources on the site and no suitable habitat for special-status species. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

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

No Impact. See response contained in Section 3.4(a). The project site is an industrial site used for the production of electrical energy. There are no riparian habitats or sensitive

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natural communities on the site. As such, no impacts would occur, and this issue will not be further analyzed in the EIR.

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

No Impact. All construction for the proposed project would occur in upland areas of the previously disturbed existing SGS site. No federally protected wetlands exist within or adjacent to construction areas that would be directly or indirectly subject to removal, filling, hydrologic interruption, or other disturbance. As such, no impacts would occur, and this issue will not be further analyzed in the EIR.

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

No Impact. The existing SGS site is essentially devoid of habitat cover and does not support wildlife movement or foraging. It does not act as a wildlife corridor or wildlife nursery (see Section 3.4(a) relative to the ESBB and California least tern). Consequently, the implementation of the proposed project would not interfere with wildlife movement, change wildlife use patterns, or impede the use of a wildlife nursery site. As such, no impacts would occur, and this issue will not be further analyzed in the EIR.

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

No Impact. The existing SGS site is essentially devoid of habitat cover and significant biological resources. Therefore, the proposed project would not conflict with any local policies or ordinances protecting biological resources, including the City of Los Angeles Tree Protection Ordinance. As such, no impacts would occur, and this issue will not be further analyzed in the EIR.

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

No Impact. The proposed project site is not included in any established federal, state, or local Habitat Conservation Plan or Natural Community Conservation Plan (CDFW

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2015b). Consequently, the proposed project would not conflict with such plans. See Section 3.4(a) for additional information. As such, no impacts would occur, and this issue will not be further analyzed in the EIR.

References

- CDFW (California Department of Fish and Wildlife). 2015a. RareFind 3, Version 3.0.2. Biogeographic Branch, Sacramento, California: California Natural Diversity Database. Accessed December 3, 2015. <http://www.dfg.ca.gov/biogeodata/cnddb/mapsanddata.asp>.
- CDFW (California Department of Fish and Wildlife). 2015b. *California Regional Conservation Plans* [map]. August 2015. Accessed January 19, 2016. <https://www.wildlife.ca.gov/Conservation/Planning/NCCP>.
- CNPS (California Native Plant Society). 2015. *Inventory of Rare and Endangered Plants* (online edition, v8-01a). Sacramento, California: California Native Plant Society. Accessed December 2, 2015. <http://cnps.site.aplus.net/cgi-bin/inv/inventory.cgi>.
- LADWP (Los Angeles Department of Water and Power). 2012. *Scattergood Generating Station Unit 3 Repowering Project* Final Environmental Impact Report. Prepared by LADWP with technical assistance by POWER Engineers, Inc. August 2012.
- SCAQMD (South Coast Air Quality Management District). 2001. *Final Environmental Impact Report for LADWP's Installation of Five Combustion Turbines at the Harbor Generating Station, Installation of Three Selective Catalytic Reduction Systems at Scattergood Generating Station, and the Installation of One Combustion Turbine at the Valley Generating Station*.
- USFWS (United States Fish and Wildlife Service). 2015. "Critical Habitat and Occurrence Data." *Geospatial Services*. Accessed January 2014. <http://www.fws.gov/data>.

3.5 Cultural Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Prehistoric Resources – Potentially Significant Impact. A cultural records search for the proposed project has been conducted by LADWP. Archival resource documentation was provided through the California Historic Resources Inventory System (CHRIS) from the South Central Coast Information Center (SCCIC). SCCIC staff reviewed records of previously recorded archaeological and built environment resources, technical reports, and historical maps for the project parcels and a 1-mile buffer area. On December 21, 2015, SCCIC provided records search results indicating that 36 previous cultural resource technical studies have been performed within the 1-mile record search buffer. Seven of those previous studies have covered either all or a portion of the project Area of Potential Effect (APE). Additionally, the 2012 LADWP Unit 3 Repowering EIR included an evaluation and survey of the SGS property for the presence of historical resources as defined in CEQA Guidelines §15064.5. This evaluation consisted of a cultural resources study, a records search, and examination of previous studies conducted on the site and in the area.

The SCCIC record search indicated that no cultural resources have been previously identified in the project APE. Twelve cultural sites were located in the 1-mile record search buffer. They included one prehistoric shell scatter, one prehistoric habitation site, one historic trash dump and seven historic structures. While these resources are located within the 1-mile record search buffer, none of these resources intersect with, or are located within the project APE. Other reviewed sources of information at the SCCIC included the National Register of Historic Properties (NRHP), California Register of Historical Resources (CRHR), the Office of Historic Preservation (OHP) Archaeological Determinations of Eligibility, Historic Properties Data File, or the OHP Historic

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Properties Data File. In addition, SGS is not located in a City of Los Angeles Historic Preservation Overlay Zone.

While there is a possibility of encountering cultural materials during excavation of the site, the probability is low due to the previous extensive disturbance and the absence of findings from previous on-site cultural resource surveys. However, since the consultation with Native American tribes under California Assembly Bill (AB) 52 is not complete, the impact on prehistoric resources is potentially significant and this issue will be addressed in the EIR.

Historic Resources – Less Than Significant Impact. SGS Units 1 and 2 (and some of the appurtenant facilities on the site) were constructed in 1958 and 1959, respectively, and Unit 3 was added to SGS in 1974. The facilities at SGS are not listed in the California Register of Historic Resources (CRHR) or other historic register, but some equipment and generation units were constructed more than 50 years ago. For this reason, the 2012 LADWP Unit 3 Repowering EIR included an evaluation of the SGS for historic significance using the criteria listed in CEQA Guidelines Section 15064.5 and the criteria for listing in the CRHR. As part of this evaluation, four 1959-era buildings within the SGS property were recorded on State of California Department of Parks and Recreation Series 523 forms.

The CEQA Guidelines establish that a project would have a significant effect on historical resources if it would cause a substantial adverse change in the significance of a historical resource including any of the following: a resource listed in or determined to be eligible for the CRHR; a resource determined to be historically significant based on meeting the criteria for listing on the CRHR; or a resource listed in a local register of historic resources. For a resource to be eligible for the CRHR, it must satisfy each of the following three standards:

- A resource must be significant at the local, state, or national level under one or more of the following criteria:
 1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.
 2. It is associated with the lives of persons important to local, California, or national history.
 3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values.

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4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.
- A resource must retain enough of its historic character or appearance to be recognizable as a historic resource and to convey the reasons for its significance.
 - It must be fifty years old or older (except for rare cases of resources of exceptional significance).

The cultural resources evaluation conducted for the 2012 LADWP Unit 3 Repowering EIR (*Scattergood Generating Station Unit 3 Repowering Project Cultural Resources Survey*) examined the SGS site for CRHR eligibility using the above criteria. The evaluation found that SGS does not represent a significant contribution within LADWP or the broader context of settlement in Southern California. As such, SGS does not qualify under the CRHR eligibility standard Criterion 1 for significance at the local, state, or national level. Regarding Criterion 2, the cultural resources study found that while Ezra Scattergood (the eponym of SGS) was an important figure in the history of LADWP and the development of power in Southern California, SGS is not directly associated with Scattergood (Scattergood died 14 years before the property was acquired by LADWP). As such, SGS does not qualify for listing under CRHR eligibility standard Criterion 2. Furthermore, the cultural resources evaluation found that the site does not exhibit distinctive characteristics of a type, period, region, or method of construction, nor does it represent the work of a master or possess high artistic value. As such, the site is not unique or significant and, therefore, does not qualify for listing under CRHR eligibility standard Criterion 3. Regarding Criterion 4, the cultural resources evaluation found that the very low probability of intact archaeological deposits means that the property has low potential to yield information important to the prehistory or history of the state or local area, and as such would not qualify for listing under CRHR eligibility standard Criterion 4 (LADWP 2012).

Because the property does not meet any of the criteria for significance at the local, state or national level, LADWP found that the property is not eligible for listing to the CRHR. The SGS property does not satisfy the definition of a historic resource under CEQA; as such, construction and operation of the proposed project would not cause a substantial change in the significance of a historical resource. No impact would occur, and this issue will not be further analyzed in the EIR.

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

Potentially Significant Impact. The project site has been developed with power generating uses since the late 1950s. Several archeological investigations have taken place on the project site in association with previous projects, including studies and record searches conducted in association with the 2001 SCAQMD EIR and the 2012 LADWP Unit 3 Repowering EIR. No archeological resources have been identified on the project site during previous projects or previous studies and records searches (LADWP 2015).

The SGS site has been subjected to an extensive amount of construction and ground disturbance in the past, which has included former use of the property by the Gordon Sand Plant and extensive development for power generation by LADWP. Archaeological spot surveys on the SGS site in 2000, in conjunction with an EIR for the construction of air pollution control equipment, characterized that project as having no impact on archaeological resources (Conejo Archeological Consultants 2000).

Given the large amount of past site disturbance and the lack of resources found within the site and in areas adjacent to the site, there is very low probability that pre-historic archaeological resources would be encountered during construction of the proposed project. However, as noted above in Section 3.5a, the potential for discovery of resources during construction is possible, and damage to or destruction of resources due to construction may result in a significant adverse impact on archaeological resources. The impact is potentially significant and will be addressed in the EIR. Also, see Section 3.17 for additional information concerning monitoring by qualified Native American inspectors during construction.

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

Potentially Significant Impact. The project site occurs in an area composed predominantly of surficial sedimentary units of Pleistocene and Holocene age. These sediments include deposition derived from continental, alluvial fan-derived sources, sub-aerial floodplain sources, and marine terrace and near-shore sources (CEC 2000). In particular, the Pleistocene age Palos Verdes Sand formation that occurs generally throughout the southwestern Los Angeles County coastal region has produced some of the most significant fossil discoveries in California. The Old Dune sand complex is also known to contain significant fossil resources. Based on monitoring and specimen collection during construction of the Unit 3 Repowering Project, numerous significant

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paleontological resources were uncovered and recovered from exposures of the Palos Verdes Sand and Old Dune sand, and important stratigraphic, geologic, and taphonomic information related to the burial and preservation of the fossils was also collected. Accordingly, the field and laboratory programs during construction at SGS represent an important advance toward the understanding of the late Pleistocene/early Holocene in this area (LADWP 2014).

Grading for the proposed Unit 1 and 2 Repowering would result in some excavation within the Palos Verdes Sand formation, though excavations would be minor compared to the Unit 3 construction and would be limited to pipe trenching and minor foundation excavation. Nonetheless, the potential for discovery of fossils is high. This issue will be discussed in the EIR.

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

Less Than Significant Impact. During the history of construction and operations at SGS, including extensive grading during construction, no human remains have been discovered, including during the recent extensive grading and excavation work conducted for the Unit 3 Repowering. No human internment sites are expected to be discovered during the construction of the proposed project. However, in the event that remains are unearthed during construction, State Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98 provide guidance on the actions that must be taken, including procedures for contacting the Los Angeles County Coroner. These procedures follow state law and are not discretionary. The impact is less than significant and this issue will not be further analyzed in the EIR.

References

- CEC (California Energy Commission). 2000. *El Segundo Power Redevelopment Project Paleontological Resources*. Prepared by Lawler and Associates Applied Geoscience. Prepared for California Energy Commission. December 2000.
- Conejo Archaeological Consultants. 2000. *Phase I Archaeological Investigation of Limited Areas within the Los Angeles Department of Water and Power's Harbor, Scattergood, and Valley Generating Stations, Los Angeles County, California*. Prepared for ENSR. Prepared by Conejo Archaeological Consultants. October 26, 2000. Accessed November 28, 2015. http://www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2001/ladwp/appendix_f.pdf?sfvrsn=2.

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LADWP (Los Angeles Department of Water and Power). 2012. *Scattergood Generating Station Unit 3 Repowering Project* Final Environmental Impact Report. Prepared by LADWP with technical assistance by POWER Engineers, Inc. SCH# 2011011079, August 2012.

LADWP (Los Angeles Department of Water and Power). 2014. *Paleontological Resources Report*. Paleontological Resources Monitoring and Mitigation Plan, during construction of Scattergood Generating Station Unit 3 Repowering Project. October 28, 2014.

3.6 Geology and Soils

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
disposal systems where sewers are not available for the disposal of waste water?				

a) *Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:*

i) *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*

No Impact. Two major active earthquake fault zones and several smaller earthquake faults are located within the general region of SGS. The Palos Verdes Fault Zone is located offshore approximately 3.5 miles southwest of the station at its nearest point. The Newport-Inglewood Fault Zone is located approximately 5.5 miles northeast of the station at its nearest point. Portions of the Newport-Inglewood Fault, including the section nearest to SGS, are contained in an Alquist-Priolo Earthquake Fault Zone. However, no fault is known to pass through the station property, and fault rupture at the station is not anticipated based on regional geology. No impact would occur, and this issue will not be further analyzed in the EIR.

ii) *Strong seismic ground shaking?*

Less Than Significant Impact. SGS is located within the seismically active Southern California area, and, like all locations within the region, is potentially subject to strong seismic ground shaking. As discussed above in Section 3.6(a)(i), two major active earthquake fault zones are located within the general region of SGS. Numerous smaller active faults are also located within the general region of the project site. The proposed project provides for the removal from service of existing steam-boiler generating units and the construction of new generating units within the existing SGS property boundaries. The design of the proposed project facilities would be based on a comprehensive pre-construction geotechnical analysis and would conform to the latest version of the California Building Code, the Uniform Building Code, and all other applicable federal, state,

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and local codes relative to seismic design criteria, and it would not increase the exposure of people or structures at SGS to potential substantial adverse effects from strong ground shaking. As such, impacts would be less than significant, and this issue will not be further analyzed in the EIR.

iii) Seismic-related ground failure, including liquefaction?

No Impact. According to City of Los Angeles Bureau of Engineering and state mapping data, the SGS property is not located on soils susceptible to liquefaction (City of Los Angeles 2015; Division of Mines and Geology 1999). As such, no impact would occur, and this issue will not be further analyzed in the EIR.

iv) Landslides?

Less Than Significant Impact. According to City of Los Angeles Bureau of Engineering and state mapping data, portions of the SGS property possess the potential for seismically induced slope failure, a determination based primarily on existing slope gradient and height rather than site-specific geotechnical investigations (City of Los Angeles 2015; Division of Mines and Geology 1999). This includes the slope located east of the westernmost and lowest terrace at SGS, within which existing generating units and the site for proposed project CCGS are located. As part of the Unit 3 Repowering Project, geotechnical investigations were undertaken, and portions of this slope were modified substantially with the construction of retaining walls. The improvements were engineered consistent with established practice and according to applicable codes to resist the lateral pressure from the soil of the higher terrace located to the east, eliminating the potential for seismically induced slope failure. The proposed project would not disturb the existing or retained slope, and it would not increase the exposure of people or structures to potential substantial adverse effects related to landslides. As such, impacts would be less than significant, and this issue will not be further analyzed in the EIR.

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

Less Than Significant Impact. Construction of the proposed project would result in ground surface disturbance during excavation and grading that could create the potential for erosion to occur. However, under the provisions of the California State Water Resources Control Board Storm Water Program, Storm Water General Construction Permit Best Management Practices (BMPs), including the preparation of erosion control

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plans and a Storm Water Pollution Prevention Plan (SWPPP), would be employed to control any potential erosion or sedimentation impacts related to the proposed project construction and operation. Therefore, the project would not result in substantial soil erosion or the loss of topsoil. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

- c) *Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?*

Less Than Significant Impact. See discussion under Sections 3.6(a)(iii) and 3.6(a)(iv).

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

No Impact. Based on soil formations at SGS, which generally consist of Recent Dune Sand from the Holocene Age overlaying Older Dune Sands from the Pleistocene Age, the proposed project would not encounter expansive soils (Los Angeles International Airport 2004). As such, no impact would occur, and this issue will not be further analyzed in the EIR.

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

No Impact. The SGS is currently connected to the City of Los Angeles sewer system for sanitary wastewater disposal. The proposed project provides for the removal from service of existing electrical generating units and the construction of new generating units within the existing SGS property boundaries. It would not significantly increase the number of personnel on site or require an expansion of the existing wastewater disposal system for sanitary waste purposes. No septic tanks or alternative wastewater disposal system would be required. As such, no impact would occur, and this issue will not be further analyzed in the EIR.

References

City of Los Angeles. 2015. "NavigateLA." Geotechnical Layers. Accessed November 30, 2015.
<http://navigatela.lacity.org/navigatela/>.

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Los Angeles International Airport. 2004. “Earth/Geology” in *LAX Master Plan Final EIR*. Accessed November 30, 2015. <http://www.lawa.org/ourLAX/PastProjects.aspx?id=8844>.

3.7 Greenhouse Gas Emissions

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

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

Potentially Significant Impact. Greenhouse gas (GHG) emissions would be produced from project-related short-term construction activities and from long-term project operations. GHG emissions during construction would occur primarily from the operation of off-road construction equipment and on-road trucks with internal combustion engines and the use of motor vehicles by construction employees traveling to and from the work site. Project operations would generate GHG emissions as a byproduct of the combustion of natural gas used to power the proposed turbine generator, as well as other equipment using petroleum-based fuel, such as the standby generators, pumps, and equipment that use diesel fuel, natural gas, or gasoline. Relative to operations, the proposed generating units would provide for more efficient fuel use compared to the existing units that they would replace and would reduce GHG emissions per megawatt of power produced. However, the EIR will further analyze GHG emissions to quantify and evaluate the combined impacts of both construction and operations.

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

Potentially Significant Impact. The proposed project will emit GHGs as a result of the combustion of natural gas in the CTG and the other minor sources noted in Section 3.7(a) above. Among other objectives, the project is being undertaken to achieve power production efficiencies and the associated emission reductions consistent with local air quality programs, which include the air pollution benefits inherent in replacing electric generation equipment installed over 50 years ago. However, while the proposed project would increase the efficiency of power generation, the project's potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs will be included in the EIR.

3.8 Hazards and Hazardous Materials

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

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Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
with an adopted emergency response plan or emergency evacuation plan?				
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Less Than Significant Impact. During construction of the proposed project, activities involving some hazardous materials would occur, including on-site fueling and minor servicing of construction equipment. However, construction activities would be short-term in nature, and the types of materials that would be routinely involved are not considered acutely hazardous. Furthermore, the routine handling, transport, and storage of these materials are subject to federal, state, and local health and safety requirements. Therefore, project construction would not create a significant hazard to the public or environment from the routine transport, use, or disposal of hazardous materials such as vehicle fluids or due to reasonably foreseeable upset or accident. Construction-related impacts would therefore be less than significant and will not be further analyzed in the EIR.

Operation of the proposed project would involve the use of potentially hazardous materials, including natural gas to fuel the new units and 29 percent aqueous ammonia and catalysts used in the SCR systems to reduce air pollutant emissions. All of these materials are currently used at SGS. Also, the proposed project would not increase the rate of transport, use, and disposal of these substances at the site. In particular, the amount and location of aqueous ammonia storage and use at SGS would remain constant, since the quantities of ammonia required for new equipment would be offset by eliminating its use in the units to be decommissioned. As such, this issue will not be further analyzed in the EIR.

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

Less Than Significant Impact. See discussion under Section 3.8(a). In that proposed facilities to be installed are inherently more reliable than the equipment being replaced, and no increase in use of hazardous materials would occur, the proposed project would not create increased hazards to the public involving upset or accidents. This issue will not be further examined in the EIR.

- c) *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

Less Than Significant Impact. El Segundo Preschool is located approximately 0.2 mile from SGS. However, there will be no increase in handling of hazardous materials due to the proposed project. Existing safeguards and response plans will remain in effect at the site. As such, this issue will not be further examined in the EIR (note that a health risk assessment related to toxic air pollutants will be performed in the EIR in the air quality section).

- d) *Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

No Impact. Government Code Section 65962.5 refers to a list of facilities that may be subject to the Resource Conservation and Recovery Act (RCRA) corrective action program. SGS is listed on the database (Environmental Protection Agency Envirofacts Data Warehouse, RCRA Info Database) because the facility is a generator of hazardous waste (U.S. EPA 2015a). The proposed project site is included on the California Department of Toxic Substances Control database (EnviroStor) as an activity that generates hazardous waste (DTSC 2007, U.S. EPA 2015b, U.S. EPA 2015c, DTSC 2015). However, there are no previous or current contaminations or clean-up actions associated with the site.

Hazardous wastes from the facility are managed in accordance with applicable federal, state, and local rules and regulations. Similar to existing generation Units 1 and 2 (which will be decommissioned as part of the proposed project), the hazardous waste generated from proposed project activities would consist primarily of spent catalyst, which is not

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expected to present a significant risk to human health or the environment. The catalyst would be disposed or recycled at an approved facility. In that SGS is a regulated facility and subject to inspection and reporting by the U.S. Environmental Protection Agency and California Department of Toxic Substances Control and given that no substantial changes in the handling of hazardous materials would occur under the proposed project, no significant hazardous solid waste impacts would occur, and this issue will not be further examined in the EIR.

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

Less Than Significant Impact. The proposed project site is located just outside the boundary of the airport land use plan for LAX. The project site is not located in or near any of the runway clear zones, or on the approach/departure path of any of its active runways (County of Los Angeles 2003). However, the proposed project would be subject to regulations pertaining to the height of structures on the site as established by the Los Angeles Department of City Planning and the Federal Aviation Administration (FAA). The Los Angeles Department of City Planning establishes a height limit for all structures of 150 feet above a baseline elevation of 126 feet above mean sea level (AMSL). This means that no structure associated with the proposed project could exceed an elevation of 276 feet AMSL without requiring special permit conditions from the Los Angeles Department of City Planning. The proposed 213-foot stack would fall below the requirement for special permit conditions.

However, the FAA requires notification pursuant to Title 14 Code of Federal Regulations (14 CFR part 77) for construction or alteration of a structure that may affect the National Airspace System. Because the proposed stack would exceed 200 feet in height and is located less than 20,000 feet from a runway, FAA notification would be required. This would be done by completing the Notice of Proposed Construction or Alteration form (FAA Form 7460-1). The FAA would then conduct a review of the proposed structure to determine whether there is a hazard to air navigation and would formally notify LADWP of its findings. The FAA may require markings and lighting to enhance the air safety of the proposed stack. The FAA notification process is a matter of law and is binding on the applicant. Compliance with the FAA notification process and any requirements that the FAA issues in response would ensure that impacts to air safety would be less than significant. As such, this issue will not be further analyzed in the EIR.

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

No Impact. The proposed project is not located within the vicinity of a private use airport, general aviation airport, or airstrip. No safety hazards would occur, and this issue will not be further analyzed in the EIR.

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

No Impact. The proposed project would be located in the interior of the existing SGS site. It would not impair the implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan for any area outside the station. Procedures for emergency response and evacuation are provided to all LADWP employees at the station. These procedures would be updated as necessary in the Risk Management Plan for SGS to account for the proposed generating units and associated facilities. All personnel involved in the construction of the proposed project would also receive training regarding emergency response and evacuation measures at the station during the construction phase of the proposed project. No impact would occur, and this issue will not be further analyzed in the EIR.

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

No Impact. The proposed project site is located in an urbanized area, surrounded primarily by existing industrial and residential development, and is not subject to risk from wildland fires (City of Los Angeles 1996). No construction or operational activity related to the proposed project would create a significant wildfire risk. No impact would occur, and this issue will not be further analyzed in the EIR.

References

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<http://www2.epa.gov/enviro/cerclis-search>.

3.9 Hydrology and Water Quality

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Potentially Significant Impact. As noted previously in Section 3.6(b), construction of the proposed project would result in ground surface disturbance during excavation and grading that could create the potential for erosion. However, construction activities would be subject to applicable requirements of the SWRCB and RWQCB with respect to control of surface erosion, sedimentation, and runoff quality. LADWP will comply with these requirements, including preparation of a construction SWPPP, which would ensure that construction impacts are less than significant. Therefore, the project would not violate water quality standards or waste discharge requirements during construction. As such, construction-related impacts would be less than significant, and this issue will not be further analyzed in the EIR.

The proposed project would change the process for handling industrial process wastewater generated on-site during project operations. Under existing conditions, such wastes are treated on-site and discharged through the SGS ocean outfall in accordance with the SGS Waste Discharge Permit. With the implementation of the proposed project,

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LADWP plans to send the process wastewater to the Hyperion Wastewater Treatment Plant for treatment. As noted previously, a new or upgraded pipeline between SGS and Hyperion would be constructed. SGS will need to obtain a new Industrial Waste Permit for the discharge. The EIR will evaluate the impacts of constructing or upgrading the wastewater line and will evaluate water quality impacts associated with the anticipated waste discharge standards and permit requirements (in addition, see Section 3.17(a)).

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

No Impact. The proposed project would not use local groundwater supplies or substantially interfere with local groundwater recharge operations. No impact would occur, and this issue will not be further analyzed in the EIR.

- c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?*

No Impact. There are no drainage courses, streams, or rivers that cross the project site or are adjacent to the project site. Therefore, there are no such features that would be affected by the construction or operation of the project or whose modification would result in substantial erosion or siltation. (See also Section 3.9(e)). No impact would occur, and this issue will not be further evaluated in the EIR.

- d) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*

Less Than Significant Impact. There are no drainage courses, streams, or rivers that cross the project site or that are adjacent to the project site; therefore, significant changes to existing drainage patterns would not occur. During operations, storm water drainage and control systems for the proposed project would be subject to permit approval by the RWQCB. The drainage system for the proposed facilities would be designed pursuant to current storm water containment and quality requirements of RWQCB and City of Los Angeles. Since the proposed facilities will be constructed on a portion of the site that

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previously contained similarly sized generating units, changes to on-site or off-site drainage, including increases in runoff, that would result in flooding in surrounding areas would not occur. This issue will not be further evaluated in the EIR.

- e) *Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?*

Potentially Significant Impact. As stated previously, construction activities would comply with applicable requirements of the SWRCB and RWQCB, including compliance with NPDES permit regulations. Best management practices would be employed during project construction to control any potential erosion or siltation impacts related to construction activities. Compliance with NPDES requirements would ensure that the construction activities would not become a source of polluted runoff affecting surrounding areas. The impact would be less than significant, and this issue will not be analyzed further in the EIR.

Under the proposed project, storm water runoff from process areas of the site, where substances such as oil and grease may be present, would be collected and may require on-site treatment prior to discharge. Additional evaluation will be conducted to determine whether such wastes would be suitable for discharge to the municipal storm water system or must be discharged to municipal sanitary system with treatment to occur at the Hyperion Wastewater Treatment Plant. Storm water runoff from non-process areas would be collected through existing and new on-site catchment devices and directed to the site's storm water system where it would be managed as to volume and quality, prior to discharge to an area-wide storm water system. Because proposed project operations would potentially change the method of storm water collection, discharge volumes, and quality of discharge, these impacts are potentially significant and will be addressed in the EIR.

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

No Impact. Based on the type and magnitude of activities anticipated during project construction and operations, and the fact that industrial waste discharges will be managed through a discharge permit process with the RWQCB, and runoff will be managed during both construction and operations, the proposed project would not otherwise substantially degrade water quality. No impact would occur, and this issue will not be further analyzed in the EIR.

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

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

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

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

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

No Impact. The proposed project provides for the removal from service of existing power generation units (Units 1 and 2) and the construction of new replacement generating units within the existing SGS property boundaries. It would not increase the risk of loss, injury, or death involving flooding on the site or in the vicinity. No impact would occur, and this issue will not be further analyzed in the EIR.

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

No Impact. The proposed project would not increase the risk associated with seiche, tsunami, or mudflow at the site. There are no reservoirs or other enclosed water bodies nearby that would create a seiche hazard. The tsunami inundation hazard maps, published by the California Department of Conservation, show that the potential tsunami run-up in the vicinity of SGS would remain west of Vista Del Mar. The inundation maps show the maximum considered tsunami run-up from a number of extreme, yet realistic, tsunami sources. No impact would occur, and this issue will not be further analyzed in the EIR.

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References

City of Los Angeles. 1996. "Safety Element" in *The Los Angeles City General Plan*. Department of City Planning. Adopted November 26, 1996. Accessed November 29, 2015. <http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf>.

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3.10 Land Use and Planning

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

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a) Would the project physically divide an established community?

No Impact. The construction and operation of the proposed project would be completely contained within the existing 56-acre SGS property, which is owned by LADWP and occupied by facilities devoted to the production and transmission of electricity. Therefore, construction and operation of the proposed project would not result in physical division of any established communities. No impact would occur, and this issue will not be further analyzed in the EIR.

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

No Impact. The project would be located on the existing 56-acre SGS property, which is owned by LADWP. The site is within the City of Los Angeles and is designated as Public Facilities by zoning ordinance and general plan. The existing and proposed uses are consistent with the zoning and general plan designations (City of Los Angeles 2015). No conflicts with general plan policy or zoning regulations would occur.

Though SGS is adjacent to the Pacific Ocean, the site itself is not in the coastal zone boundary as defined by the California Coastal Act (CCA). SGS and Hyperion Wastewater Treatment Plant are excluded from the coastal zone boundary through specific language in the CCA (Section 30166(c), Chapter 2.5, Division 20, and California Public Resources Code). However, SGS's existing ocean cooling water intake and discharge structures are located in the coastal zone. As noted in the project description, the proposed repowered units would not utilize the existing once-through ocean water cooling system, but instead would use a dry cooling system located adjacent to the generating equipment, within the SGS property east of Vista Del Mar. No physical modifications to the existing once-through ocean water cooling structures would occur under the proposed project. Therefore, the policies of the CCA and Local Coastal Plan do not apply to the proposed project. (See Section 1.2 of this document for details on the relationship between the ocean cooling water structures and the proposed project.) No impact would occur, and this issue will not be further analyzed in the EIR.

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

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

References

City of Los Angeles. 2015. "Zoning Information and Map Access System (ZIMAS)." Accessed November 11, 2015. <http://zimas.lacity.org/>.

3.11 Mineral Resources

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

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

No Impact. The proposed project site is not designated a known mineral resources site of significance to the state or region (based on state Surface Mining and Reclamation Act designations and City of Los Angeles General Plan Conservation Element). No impact would occur and this issue will not be further analyzed in the EIR.

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- b) *Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?***

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

3.12 Noise

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

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

Potentially Significant Impact. Noise related to construction activity could potentially expose nearby sensitive receptors, such as residential uses, to noise levels above

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established standards. Although construction activity would be temporary, some activities may be audible at receptors, including some activities occurring during evening or nighttime hours. This would result in a potentially significant impact. Further evaluation of noise that would be created by proposed project construction activities in relation to applicable standards will be conducted in the EIR.

The proposed project would be located in the interior of an existing electrical generating station that includes large steam-boiler and gas-combustion turbine generating units and other facilities that create noise during operations. As well as adding new generating units to SGS, the proposed project would remove existing Units 1 and 2 from service, partially or entirely offsetting the noise that would be created by the new units. However, the proposed units would be sited in different locations than Units 1 and 2, thereby altering the nature, level, and propagation of noise generated by operations at SGS. Further evaluation of noise that would be created by proposed project operations in relation to applicable standards will be conducted in the EIR.

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

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

The operation of the proposed project is not expected to expose persons to excessive groundborne vibration or groundborne noise levels. The impact would be less than significant, and this issue will not be further analyzed in the EIR.

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

Potentially Significant Impact. The proposed project would be located within an existing electrical generating station that includes large steam-boiler and gas-combustion turbine generating units and other facilities that create noise during operations. As well as adding new generation units to SGS, the proposed project would remove existing Units 1 and 2 from service, partially or entirely offsetting the noise that would be created by the new units. However, the proposed units would be sited in different locations than the

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existing units, thereby altering the nature, level, and propagation of noise generated by operations at SGS. Further evaluation of noise that would be created by proposed project operations in relation to ambient noise levels in the vicinity will be conducted in the EIR.

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

Potentially Significant Impact. A substantial temporary increase in ambient noise levels in the project vicinity above levels existing without the project may occur related to project construction. Although this impact would be related to only the construction phase of the proposed project, it may still be considered significant. Further evaluation of noise that would be created by proposed project construction activities in relation to ambient noise levels in the vicinity will be conducted in the EIR.

- e) *Would the project be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

No Impact. SGS is located approximately one mile south of LAX. However, related to aircraft noise from the airport, SGS lies outside the 65 dBA Community Noise Equivalent Level, which is defined as the normally acceptable level of aircraft noise for noise-sensitive land uses according to the California Airport Noise Standard (Title 21, Section 5012). Furthermore, since the proposed project would be sited within a currently operating generating station and would consist of the removal of existing generating units from service and installment of new generating units, no aspect of the project would increase the existing exposure of people in the area to noise from aircraft operations. As such, no impact would occur, and this issue will not be further analyzed in the EIR.

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

No Impact. The proposed project is not located within the vicinity of a private airstrip. As such, no impact would occur, and this issue will not be further analyzed in the EIR.

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3.13 Population and Housing

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

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

Less Than Significant Impact. Due to the relatively low number of personnel required for project construction in the context of the Los Angeles urban area and the temporary nature of construction, no substantial population growth in the area would occur related to construction. The operation of the proposed project would not increase the number of operating personnel on site and thus would not induce population growth or the need for new housing in the area. No impact due to construction and operations workforce would occur, and this issue will not be further analyzed in the EIR.

The proposed project would provide no new homes or businesses; however, the project would increase the power generating capacity at SGS by up to 49 MW relative to existing conditions (830 MW generation capacity at SGS and 7,628 MW total net dependable generation capacity within the LADWP system). The additional capacity would not directly or indirectly induce population growth in the area because it represents only a marginal increase that would primarily replace other existing sources of generation within the LADWP system (for example, LADWP has committed to eliminating the use of coal-fired generation in its power portfolio). However, the relationship of the project to growth inducement will be addressed in the EIR in the mandatory content section entitled, “Growth Inducing Impact of the Proposed Project.”

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

No Impact. The project would be located completely within the existing 56-acre SGS. There is no existing housing within the project property, nor does the project require removal of any housing outside the property. No impact would occur, and this issue will not be further analyzed in the EIR.

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

No Impact. See response in Section 3.13(b).

3.14 Public Services

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Fire protection?

No Impact. Fire protection for SGS is provided by the Los Angeles Fire Department from Station 51, located at 10435 South Sepulveda Boulevard (City of Los Angeles 2015). Within the context of SGS operations and facilities, the proposed project would not generate a requirement for additional fire protection. As such, no new or expanded

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fire facilities would be required, and no impact would occur. This issue will not be further analyzed in the EIR.

Police protection?

No Impact. Police services at SGS are provided by the Los Angeles Police Department from the Pacific Community Police Station, located at 12312 Culver Boulevard (City of Los Angeles 2015). The SGS is also guarded and patrolled by LADWP security personnel. Within the context of SGS operations and facilities, the proposed project would not generate a requirement for additional police protection. As such, no new or expanded police facilities would be required, and no impact would occur. This issue will not be further analyzed in the EIR.

Schools?

No Impact. The proposed project provides for the removal from service of existing electrical generating units and the construction of new generating units within the existing SGS property boundaries. It would not directly generate a demand for school services, nor would it lead directly or indirectly to substantial population growth within a given geographical area such that new or physically altered school facilities would be required. As such, no impact would occur, and this issue will not be further analyzed in the EIR.

Parks?

No Impact. The proposed project provides for the removal from service of existing electrical generating units and the construction of new generating units within the existing SGS property boundaries. It would not directly generate a demand for parks, nor would it lead directly or indirectly to substantial population growth within a given geographical area such that new or physically altered park facilities would be required. As such, no impact would occur, and this issue will not be further analyzed in the EIR.

Other public facilities?

No Impact. The proposed project provides for the removal from service of existing electrical generating units and the construction of new generating units within the existing SGS property boundaries. No new housing or businesses would be constructed as part of the project. The project would not create a need for other new or expanded governmental facilities or services. As such, no impact would occur, and this issue will not be further analyzed in the EIR.

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References

City of Los Angeles. 2015. "Zoning Information and Map Access System (ZIMAS)." Accessed November 11, 2015. <http://zimas.lacity.org/>.

3.15 Recreation

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input 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"/>

- 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. Neither the construction nor operation of the proposed project would increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. No impact would occur, and this issue will not be further analyzed in the EIR.

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

No Impact. The proposed project provides for the removal from service of existing electrical generating units and the construction of new generating units within the existing SGS property boundaries. It does not include recreational facilities or require construction or expansion of recreational facilities that might have an adverse physical effect on the environment. No impact would occur, and this issue will not be further analyzed in the EIR.

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3.16 Transportation and Traffic

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Potentially Significant Impact. The proposed project provides for the removal from service of existing electrical generating units and the construction of new generating units within the existing SGS property boundaries. Construction of the proposed project would require a large workforce and the delivery of large quantities of material and equipment to

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the site, including use of oversize loads. This condition would be temporary, related only to the period of time needed for construction of the proposed facilities, but it may cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system. Further evaluation of potentially significant impacts related to traffic generated by construction activities for the proposed project will be conducted in the EIR.

Operation of the proposed project would not cause any increase in traffic in relation to the existing traffic load and capacity of the street system nor would it adversely affect any other mode of transportation because it would not significantly increase beyond current levels the number of workers or vehicles required to operate facilities at the station. As such, operational impacts would be less than significant and will not be further analyzed in the EIR.

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

Potentially Significant Impact. Construction of the proposed project would require a large workforce and the delivery of large quantities of material and equipment to the site. This condition would be temporary, related only to the construction phase of the proposed project, but construction traffic may exceed a level of service standard established by the county congestion management agency for designated roads or highways. Further evaluation of potentially significant impacts related to traffic generated by construction activities for the proposed project will be conducted in the EIR.

Operation of the proposed project would not substantially increase the amount of daily inbound and outbound traffic at the SGS because it would not significantly increase beyond current levels the number of workers or vehicles required to operate facilities at the station. As such, operational impacts would be less than significant and will not be further analyzed in the EIR.

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

Less Than Significant Impact. The proposed project provides for the removal from service of existing electrical generating units and the construction of new generating units within the existing SGS property boundaries. As such, it would not contribute to an increase in air traffic levels.

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However, the project site is located approximately 1 mile south of LAX. The proposed project would involve construction of a new approximately 213-foot stack. The existing approximately 300-foot stack associated with Units 1 and 2 would be removed from the site. Due to the proximity of SGS to LAX, height restrictions are in effect for the SGS site to avoid potential obstructions to aircraft operations. As described in Section 3.8(e), this height restriction is 150 feet above the 126-foot elevation AMSL, or 276 feet AMSL, as established by the Los Angeles Department of City Planning. The proposed stack would fall below this limit and therefore would not require any special permit conditions from the Los Angeles Department of City Planning.

The FAA would be notified of the proposed stack pursuant to 14 CFR part 77, using the Notice of Proposed Construction or Alteration form (FAA Form 7460-1). As described in Section 3.8(e), the FAA would then conduct a review of the structure to determine whether there is a hazard to air navigation and would formally notify LADWP of its findings. The FAA may require markings and lighting to enhance the air safety of the proposed stack. The FAA notification process is a matter of law and is binding on the applicant. Compliance with the FAA notification process and any requirements that the FAA issues in response would ensure that impacts to air traffic patterns and air safety would be less than significant. As such, this issue will not be further analyzed in the EIR.

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

No impact. No changes to existing transportation facilities would occur. No impact would occur, and this issue will not be further analyzed in the EIR.

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

No Impact. The proposed project would not result in inadequate emergency access. Construction activities would take place within the existing SGS property boundaries, and would not impact existing emergency access to the station or to locations outside the station. During project operation, no changes would occur at SGS that would significantly affect emergency access to SGS or locations outside SGS. No impact would occur, and this issue will not be further analyzed in the EIR.

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

No Impact. The proposed project would not conflict with adopted policies, plans, or programs supporting alternative transportation. Construction activities would take place entirely within the boundaries of the SGS property and would not require the removal or relocation of alternative transportation facilities (i.e., bus stops and bike lanes). No impact would occur, and this issue will not be further analyzed in the EIR.

3.17 Tribal Cultural Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code 21074 as either a site, feature, place, cultural landscape, that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i.) Listed or eligible for listing on the California Register of Historical Resources, or included in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or,	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii.) A resource determined by a 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

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

No Impact. A SCCIC record search of the proposed project property indicated that no cultural resources have been previously identified in the project APE, though twelve cultural sites are located within the 1-mile record search buffer. None of these resources intersect with, or are located within the project APE. Information received to date from Native American tribes indicates that the site does not include known elements of cultural tribal resources.

ii.) *A resource determined by a 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.*

Potentially Significant Impact. In accordance with California Assembly Bill (AB) 52 requirements, the NAHC was contacted by LADWP in November 2015 to request a Sacred Lands File search and a list of tribes with traditional and/or cultural places located within the boundaries of Los Angeles County. The NAHC responded on December 18, 2015, by letter stating that Native American cultural resources are known to exist within the Venice Quadrangle near the project site and provided a list of local tribal representatives that should be contacted. LADWP sent letters to the representatives identified by the NAHC and also contacted a separate Native American representative identified by the NAHC with knowledge of cultural resources located in the vicinity of the project site. LADWP also provided the tribal representatives on the list with California AB 52 notification to alert the tribes of the opportunity to consult with LADWP on any concerns regarding tribal cultural resources.

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There was one tribal response by letter, stating that there were no specific concerns regarding known cultural resources in the project area at this time. However, the tribe requested that consultation continue to take place throughout the CEQA process. This consultation is ongoing. In addition, due to the possibility of encountering cultural resources during construction/excavation, it was requested that approved Native American monitors be present during future archeological surveys, testing, and ground excavations. There was one tribal response by telephone, offering approved tribal monitor services during construction excavations, if such monitoring is determined necessary.

NAHC, SCCIC records, and responding Native American tribes did not identify the known presence of archaeological resources at the project site or identify areas of known cultural and tribal value. However, LADWP has determined that the potential for discovery of cultural resources during construction may lead to potentially significant impacts and will address tribal cultural resources in the EIR.

3.18 Utilities and Service Systems

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

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Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Potentially Significant Impact. SGS is currently connected to the City of Los Angeles sewer system for sanitary wastewater disposal. The proposed project would not significantly increase the number of personnel on site during operations or require an alteration of the existing wastewater disposal system for sanitary waste purposes. Sanitary waste related to the temporary increase in on-site workforce during project construction would be handled through the use of portable chemical toilets, the waste from which would be removed by a private contractor and disposed at an approved off-site location that would comply with the wastewater treatment requirements of the RWQCB Los Angeles Region.

The handling of all other wastewater generated during operations at SGS, including industrial process wastewaters, is governed by the facility's existing NPDES discharge permit. The SGS discharges governed by the permit include treated industrial process wastewater, treated storm water, and once-through ocean cooling water. SGS's NPDES permit (CA0000370, Order No. R4-2016-0055) was recently renewed and reflects a 55% reduction of once through cooling usage due to the repowering of Unit 3.

The elimination of the use of ocean water for cooling is a positive aspect of the proposed project by virtue of eliminating entrainment and impingement impacts to marine organisms and thermal discharges associated with cooling. Consequently, the impacts of the proposed project relative to once-through cooling and the marine environment will not be evaluated further in this EIR. However, the project would require a new Industrial Wastewater permit and a new or upgraded wastewater pipeline between the SGS and Hyperion properties. Impacts would be potentially significant and will be further analyzed in the EIR.

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

Potentially Significant Impact. Relative to wastewater, SGS is currently connected to the City of Los Angeles sewer system for sanitary wastewater disposal. The proposed project would not significantly increase the number of personnel on site during operations or require an alteration of the existing wastewater disposal system for sanitary waste purposes. Sanitary waste related to the temporary increase in on-site workforce during project construction would be handled through the use of portable chemical toilets, the waste from which would be removed by a private contractor and disposed at an approved off-site location. The volume of sanitary waste generated by the construction workforce would be minor in relation to the capacity of existing wastewater treatment facilities and would not require the expansion of these facilities.

In order to accommodate the industrial or process wastewater generation related to proposed project operations, changes to the on-site wastewater treatment and handling system may be made. Off-site wastewater conveyance and treatment (anticipated to occur at Hyperion Wastewater Treatment Plant) would be necessary to accommodate project operations. The wastewater generation, treatment, and conveyance facilities for the proposed project are being designed by LADWP. The impact is potentially significant and will be evaluated further in the EIR.

Relative to water use, the construction phase of the project would require the use of water for various purposes, such as dust suppression, concrete conditioning, and hydrostatic testing of lines. For the operations phase, the decommissioning of existing generating Units 1 and 2 under the proposed project would eliminate water consumption associated with its operation. However, the proposed project generating units and associated cooling systems would also require water for such uses as air inlet evaporative cooling, cooling water system makeup, and the HRSG steam cycle. Although it is anticipated that the net water consumption at SGS would not require the construction of new water treatment or expansion of existing water treatment facilities, the potential for this to occur will be further analyzed in the EIR.

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

Potentially Significant Impact. The proposed project would modify surface drainage at SGS through the alteration of site topography necessary to accommodate the new generating facilities and through a possible minor increase in impermeable pavement and other structures. Under the proposed project, storm water runoff from process areas, where substances such as oil and grease may be present, would be collected and may require on-site treatment prior to discharge. Additional study is needed to determine whether such wastes would be suitable for discharge to a municipal storm water system or must be discharged to a municipal sanitary sewer system. Storm water runoff from non-process areas would be collected through existing and new catchment devices and directed to the site's storm water system where it would be managed as to volume and quality. Because proposed project operations would potentially change the method of storm water collection, discharge volumes, and quality of discharge, the impact is potentially significant and will be addressed in the EIR.

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

Potentially Significant Impact. As discussed above, under current operations at SGS, water is utilized for several functions in the power generation process, including condensate makeup for the steam boilers. The decommissioning of existing generating Units 1 and 2 under the proposed project would eliminate water consumption associated with their operation. However, the proposed project generating units and associated cooling systems would also require water for such uses as air inlet evaporative cooling, cooling water system makeup, and the HRSG steam cycle. The net consumption of water (i.e., the net change in water consumption after project implementation) will be further analyzed in the EIR to determine if sufficient water supplies are available to serve the project from existing entitlements and resources or if new or expanded entitlements are needed.

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

Potentially Significant Impact. See Section 3.17(b).

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

Less Than Significant Impact. The proposed project provides for the removal from service of existing power generating units and the construction of replacement units within the existing SGS property boundaries. Project operations would not significantly change the solid waste disposal requirements for SGS such that the landfill that serves the site would exceed its permitted capacity. Small amounts of hazardous waste would be generated during proposed project operations. Over time, the catalyst material used in the SCR process loses its effectiveness and must be replaced. The spent catalyst would be recycled, or it would be transported by a licensed hazardous waste transporter to a permitted hazardous waste treatment, storage, or disposal facility. The relatively small amount of hazardous waste generated by the proposed project operations would not contribute significant quantities of material to these facilities.

The construction of the proposed project would temporarily generate increased solid waste at the site. Construction debris would be recycled or transported to a landfill site and disposed of appropriately. In accordance with California legislative act AB 939, LADWP's construction contractor would ensure that source reduction techniques and recycling measures are incorporated into project construction. Hazardous materials in demolition waste would also be handled and transported in accordance with strict waste regulations. The amount of debris generated during project construction is not expected to significantly impact landfill capacities. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

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

No Impact. The proposed project would be located within the existing SGS property boundaries. Solid wastes at the station are currently accumulated, handled, and disposed in accordance with federal, state, and local regulations. In accordance with best management practices and as required by regulation and law, during construction and operation of the proposed project, LADWP would comply with all federal, state, and local solid waste diversion, reduction, and recycling mandates, including compliance with the County-wide Integrated Waste Management Plan and the Citywide Construction and Demolition Debris Recycling Ordinance. No impact would occur, and this issue will not be further analyzed in the EIR.

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3.19 Mandatory Findings of Significance

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

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

Potentially Significant Impact. The SGS site, which is extensively developed and has been used for power generation for more than 50 years, is not known to contain state and/or federally listed species or their habitats. As described in Section 3.4, impacts to state and/or federally listed species would be less than significant. While the El Segundo blue butterfly, a federally endangered species, has been identified on nearby sites, no El Segundo blue butterfly or habitat has been identified on the project site. Furthermore, it is unlikely that this species would travel onto the project site due to the lack of habitat and due to natural barriers between the project site and nearby sites. As such, the proposed project would not have the potential to substantially reduce the habitat of a fish or wildlife species, to cause a fish or wildlife population to drop below self-sustaining

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levels, to threaten elimination of a plant or animal community, or to reduce the number or restrict the range of a rare or threatened endangered plant or animal.

SGS Units 1 and 2 were constructed in 1958 and 1959, respectively, and Unit 3 was added to SGS in 1974. Some of the equipment associated with Units 1 and 2 exceeds the age of 50 years and may be altered or demolished as part of the proposed project. However, as described in Section 3.5, SGS does not meet any of the criteria for significance at the local, state or national level, and the property is not eligible for and does not meet the criteria for listing to the CRHR. As such, the proposed project would not eliminate an important example of a major period of California history.

The project site is underlain by the Pleistocene age Palos Verdes Sand formation, which is potentially fossil-bearing. Excavations made during construction have a high potential to uncover important paleontological resources (See Section 3.5(c) for details.) These potentially significant impacts will be discussed in the EIR.

NAHC, SCCIC records, and responding Native American tribes did not identify the known presence of archaeological resources at the project site or identify areas of known cultural and tribal value. However, monitoring of construction is requested by the responding tribe as a way to avoid impacts to unknown archeological resources that may exist below the ground surface. Accordingly, LADWP has determined that the potential for discovery of cultural resources or tribal cultural resources during construction may lead to potentially significant impacts and will address tribal cultural resources in the EIR.

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

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

As discussed Section 3.3, the proposed project could contribute to cumulative air quality impacts within a region that is non-attainment for O₃, PM₁₀, and PM_{2.5}. The production of GHG related to project construction and operations may result in cumulative impacts that may contribute to global climate change. Cumulative noise and traffic impacts could also

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occur during project construction. These impacts are potentially significant and would be discussed further in the EIR.

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

Potentially Significant Impact. As discussed in previous sections, environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly, may occur from implementation of the proposed project. Further evaluation of potentially significant impacts will be conducted in the EIR relative to aesthetics; air quality (related to project operation and construction); greenhouse gas emissions (related to project operation and construction); noise (related to project operation and construction); transportation/traffic (related to project construction); and water use and waste generation (related to project operation).

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