# Initial Study/Mitigated Negative Declaration

# Headworks Site Development Project

**Lead Agency:**


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Environmental Planning and Assessment
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**CEQA Initial Study and Mitigated Negative Declaration**
**Headworks Site Development Project**

April 2024

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**TECHNICAL APPENDICES**

# ACRONYMS AND ABBREVIATIONS

| | |
|---|---|
| AB 52 | Assembly Bill 52 |
| APE | Area of Potential Effects |
| AQMP | Air Quality Management Plan |
| AWPF | Advanced Water Purification Facility |
| BMP | Best Management Practice |
| BSA | biological study area |
| CDFW | California Department of Fish and Wildlife |
| CEQA | California Environmental Quality Act |
| CESA | California Endangered Species Act |
| CFGC | California Fish and Game Code |
| CNDDB | California Natural Diversity Database |
| CNEL | community noise equivalent level |
| CNPS | California Native Plant Society |
| CO | carbon monoxide |
| CRHR | California Register of Historical Resources |
| CRMMP | cultural resources monitoring and mitigation plan |
| dBA | A-weighted decibel scale |
| DDW | Division of Drinking Water |
| DPR | Direct Potable Reuse |
| FESA | Federal Endangered Species Act |
| GHG | Greenhouse Gas |
| HWSG | Headworks Spreading Grounds |
| HVAC | heating, ventilation, and air conditioning |
| IS | CEQA Initial Study |
| LADOT | City of Los Angeles Department of Transportation |
| LADWP | Los Angeles Department of Water and Power |
| LAGWRP | Los Angeles-Glendale Water Reclamation Plant |
| LARAP | Los Angeles Department of Recreation and Parks |
| LEED | Leadership in Energy and Environmental Design |
| LAFD | Los Angeles Fire Department |
| LAPD | Los Angeles Police Department |
| $L_{eq}$ | Equivalent Noise Level |
| LID | low-impact development |
| MBTA | Migratory Bird Treaty Act |
| MG | million gallons |
| MGD | million gallons per day |
| MND | Mitigated Negative Declaration |
| MRZ | Mineral Resources Zone |
| NRHP | National Register of Historic Places |
| NWI | National Wetlands Inventory |
| LST | localized significance thresholds |
| $NO_X$ | nitrogen oxides |
| NPDES | National Pollutant Discharge Elimination System |
| $O_3$ | ozone |
| OS | Open Space |
| PM | particulate matter |
| PRC | Public Resources Code |
| RTP/SCS | Regional Transportation Plan/Sustainable Communities Strategy |

| | |
|---|---|
| SCAG | Southern California Association of Governments |
| SCAQMD | South Coast Air Quality Management District |
| $SO_2$ | Sulfur dioxide |
| SWPPP | Storm Water Pollution Prevention Plan |
| SWRCB | State Water Resource Control Board |
| TAC | Toxic Air Contaminants |
| TAZ | Traffic Analysis Zone |
| VMT | vehicle miles traveled |
| VOCs | volatile organic compounds |
| WQL | Water Quality Laboratory |
| USFWS | U.S. Fish and Wildlife Service |
| VHFHSZ | Very High Fire Hazard Severity Zone |

# 1 PROJECT DESCRIPTION

## 1.1 Overview of the Project

The Los Angeles Department of Water and Power (LADWP) proposes to develop three facilities within its existing Headworks Spreading Grounds (HWSG) property, located along the northwest edge of Griffith Park in the City of Los Angeles. The facilities would include a Water Quality Laboratory (WQL), a Direct Potable Reuse (DPR) Demonstration Facility, and a public park (Headworks Restoration Park), which are the components of the Headworks Site Development Project (referred to herein as the proposed project or project). The purpose of the WQL is to replace the existing obsolete LADWP laboratory facility, which is located in the City of Pasadena. The purpose of the DPR Demonstration Facility is to test various water purification technologies for treating recycled wastewater to help the City of Los Angeles meet the goal to recycle all of its wastewater for beneficial reuse by 2035. The purpose of Headworks Restoration Park is to provide recreational access and educational opportunities regarding local ecosystems and water use. The proposed project would also include roads interior to the HWSG property, surface parking for staff and visitors, landscaping, and security lighting and fencing where required.

## 1.2 California Environmental Quality Act

The California Environmental Quality Act (CEQA; California Public Resources Code Section 21000 et seq.) applies to proposed projects initiated by, funded by, or requiring discretionary approvals from state or local government agencies. The construction and operation of the Headworks Site Development Project constitute a project as defined by CEQA (California Public Resources Code Section 21065). The CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387) Section 15367 states that a lead agency is “the public agency which has the principal responsibility for carrying out or approving a project.” Therefore, as a municipal utility with discretionary approval authority for the proposed project, LADWP is the lead agency responsible for compliance with CEQA for the project.

As the CEQA lead agency, LADWP must complete an environmental review to determine if implementation of the proposed project would result in significant adverse environmental impacts and to propose measures, as feasible, to eliminate or reduce any such identified impacts. LADWP has prepared an Initial Study (IS) to assist in making that determination. Based on the nature and scope of the proposed project and the evaluation contained in the IS environmental checklist (included herein), LADWP, as the lead agency, has concluded that a Mitigated Negative Declaration (MND) is the proper level of CEQA environmental documentation for the project. The IS shows that impacts caused by the proposed project are either less than significant or would be reduced to a less than significant level with the incorporation of appropriate mitigation measures as included herein. This conclusion is supported by CEQA Guidelines Section 15070, which states that an MND can be prepared when the IS identifies potentially significant effects, but the proposed project would either include revisions to the project plans or incorporate mitigation measures that would avoid the effects or reduce them to a less than significant level.

## 1.3 Project Location and Setting

The proposed project site is located in the Hollywood community of Los Angeles, within the existing HWSG property, which is located at 6001 West Forest Lawn Drive. HWSG is a 43-acre property situated within the boundaries of Griffith Park. The property is owned by the Los Angeles Department of Recreation and Parks (LARAP), but LADWP retains an easement over the entire 43 acres. The project site is bounded by the Los Angeles River and State Route 134 (SR-134) to the north and by Forest Lawn Drive to the east and south. An LADWP high-voltage transmission line

right-of-way runs along the northern perimeter of HWSG, between the Los Angeles River and the project site boundary. Forest Lawn Memorial Park and Mount Sinai Memorial Park are located on the south side of Forest Lawn Drive across from HWSG. Griffith Park is located adjacent to the eastern edge of HWSG, across Forest Lawn Drive. Local access to the HWSG property is provided via Forest Lawn Drive, and regional access is provided via SR-134. The HWSG property has a General Plan land use designation of OS (Open Space) and is zoned OS-1XL-H-RIO (Open Space in a River Improvement Overlay district). While located within the urban setting of Los Angeles, the project site is more immediately surrounded by open space uses, including cemeteries, passive park areas, and other recreational facilities. Figure 1 illustrates the regional location of the proposed project site and Figure 2 illustrates the existing HWSG and surrounding vicinity.

## 1.4 Project Background

### 1.4.1 Headworks Spreading Grounds Property

The HWSG property has historically been a source for water extraction, storage, and distribution for the City of Los Angeles, associated with the adjacent Los Angeles River and the San Fernando Groundwater Basin. The property was acquired by the City in 1899 to serve as the “headworks” for its water distribution system by extracting groundwater from beneath the adjacent Los Angeles River. In 1902, a diversion dam and water supply conduit to convey water south to the City were built at the property. Deep infiltration galleries to extract groundwater were added in 1905 and expanded in 1916 and 1920. Wells were subsequently developed on the property, and by 1925, 14 wells at HWSG fed the City’s water system. Spreading grounds were developed at the property in 1938 to detain river water for percolation. The water was collected in perforated pipes that were connected to infiltration galleries approximately 150 feet below the ground surface. An inflatable dam was built in the 1950s to direct river flows into the spreading grounds for infiltration into the aquifer. The spreading grounds consisted of six separate basins, ranging in size from one acre to more than eight acres. The infiltration galleries were removed from service in 1971, and river diversions into the spreading grounds ceased in 1982.

In 2012, construction began on what is now known as the Tom LaBonge Headworks Water Complex (Headworks Water Complex, formerly, the Headworks Reservoir Complex) at HWSG. The Headworks Water Complex replaced the storage capacity provided by the uncovered Silver Lake Reservoir Complex, which was removed from service to comply with updated United States Environmental Protection Agency water quality regulations. The East Reservoir was completed in 2015, and the West Reservoir was completed in 2022. The reservoirs, which have a combined storage capacity of 110 million gallons (MG), are located in the eastern portion of the HWSG, and occupy approximately half the property. The two reservoirs are roofed concrete structures that are partially below grade (20 feet) and partially above grade (20 feet). The top of the East Reservoir has been buried with approximately 3 feet of soil, the top of the West Reservoir will be similarly covered before initiation of the proposed project. Soil embankments have been built up around the above-grade walls of the reservoirs. However, the west facade of the West Reservoir remains exposed to showcase the technical and engineering achievement of the reservoir’s construction.

The entire HWSG property has been highly disturbed starting in the early 20th century with the installation of water extraction and conveyance facilities involving deep excavation and grading, the mid-century development of the spreading grounds requiring extensive earth movement across the site, and the recent implementation of the Headworks Water Complex, which entailed the construction of large, partially buried structures that encompass the eastern half of the property. Similarly, construction of the River Supply Conduit Improvement Lower Reach Project has resulted in excavation of the HWSG property for the construction of a flow control station and supply conduit in 2022. While trees have reestablished in previously disturbed areas along


HEADWORKS SITE DEVELOPMENT PROJECT

## Regional Vicinity

Figure 1


**Legend**

- Headworks Spreading Grounds Property
- Griffith Park

0 600 1,200 Feet

Source: County of Los Angeles, ArcGIS Online

HEADWORKS SITE DEVELOPMENT PROJECT

## Headworks Spreading Grounds and Vicinity

Figure 2

portions of the southern perimeter (adjacent to Forest Lawn Drive) since the spreading grounds function was discontinued decades ago, the remainder of HWSG property is largely devoid of vegetative cover, including the portion of the property west of the reservoirs, which was used as a soil borrow and fill area related to the reservoir construction. The exception to this is at the far eastern portion of the property (east of the East Reservoir), where low-growing scrub vegetation has reestablished, and a portion of the top of the East Reservoir itself, which has been planted with low-growing scrub vegetation.

**Water Quality Laboratory**

The current LADWP laboratory is located in a former office building in the City of Pasadena that was built in the 1960s. The facility was purchased by the LADWP in 2003 and modified over time to allow the department to conduct critical laboratory functions related to drinking water sample testing necessary to meet regulatory requirements and ensure the quality of drinking water for the City of Los Angeles. The laboratory conducted over 38,000 sample analyses per year (based on the average from 2015 – 2018). In addition, the WQL participates in special studies and projects in support of treatment operations, groundwater assessments, unregulated contaminants, and water security monitoring. The laboratory maintains a quality assurance program that provides data of documented quality and conformance with regulatory standards and collaborates with other laboratories and agencies to enhance analytical capabilities.

The use of the current laboratory building was intended to be temporary but has continued for over two decades. Since its purchase in 2003, the building has been retrofitted multiple times to accommodate the various laboratory functions, which have expanded over time based on new regulations and more stringent testing requirements. The laboratory building has insufficient space, poor functional layout, and inadequate electrical and mechanical systems, which have required continual upgrades and repair. The higher demand for testing services has increased workload and staffing, causing safety concerns related to a lack of sufficient working space.

The proposed WQL at HWSG is necessary to functionally replace the existing deteriorating and inadequate LADWP laboratory, increase operational efficiencies, and improve logistics by locating the laboratory within the LADWP service area. In addition, laboratory staff who currently report to various locations other than the existing laboratory building would be able to work from one central location. The new WQL would improve safety for staff by incorporating ergonomics to comply with standard safety requirements for both personnel and laboratory instruments. The facility would also be designed to meet the Mayor's Resilience by Design Directive by seeking to obtain Leadership in Energy and Environmental Design (LEED) Gold certification, with the objective to achieve LEED Platinum certification and Envision Sustainable Infrastructure certification. The new WQL would also reduce long-term operations and maintenance costs.

### 1.4.2 Direct Potable Reuse Demonstration Facility

The City of Los Angeles has a goal to reuse all of its wastewater by 2035 for beneficial uses in order to reduce its use of scarce, costly, and energy-consumptive imported water supplies. This reuse may include the continued use of recycled wastewater for non-drinking water purposes, such as irrigation; environmental uses; and/or the purification of recycled wastewater through advanced treatment processes for non-direct potable reuse, such as groundwater recharge. In the future, reuse may also include DPR, in which purified recycled water could be used for potable water purposes. To help meet the City's wastewater reuse goal, LADWP is exploring various advanced treatment technologies that would ultimately support DPR. The DPR Demonstration Facility component of the proposed project would include an advanced water purification facility (AWPF), as defined in the State Water Resource Control Board (SWRCB) Proposed Framework

for Regulating Direct Potable Reuse in California – Second Edition (August 2019). The demonstration facility would provide the opportunity to verify the technologies and processes required to produce purified recycled water suitable for DPR under close coordination with the SWRCB Division of Drinking Water (DDW), which must ultimately approve DPR programs. The facility would also include an educational element to inform the public about DPR and other aspects of water use in the City.

The Los Angeles-Glendale Water Reclamation Plant (LAGWRP), located adjacent to the Los Angeles River, approximately 3.5 miles downstream from HWSG, is a source of recycled water that would serve as influent for the proposed DPR Demonstration Facility. Recycled water from LAGWRP is shared equally between the City of Los Angeles and the City of Glendale, each retaining ownership of 50 percent of the treated effluent. All wastewater received at LAGWRP is treated to a tertiary level, which includes a nitrification/denitrification process prior to the tertiary treatment step. The plant has a treatment capacity of approximately 20 million gallons per day (MGD) but currently produces an average of approximately 16 MGD. A portion of the tertiary effluent is delivered to recycled water distribution systems for LADWP and the City of Glendale, and a portion is discharged to the Los Angeles River. LADWP currently utilizes the recycled water from LAGWRP primarily to provide irrigation of golf courses, cemeteries, and other sites located in and around Griffith Park, near the HWSG. This water is delivered via a recycled water line that runs within Forest Lawn Drive south of HWSG.

### 1.4.3 Headworks Restoration Park

The LA River Master Plan (2021) explores the potential to create a public benefit and unifying feature for the diverse communities that span the 51-mile length of the Los Angeles River from Canoga Park in the west San Fernando Valley to Long Beach Harbor. Among the strategies considered in the plan are possible uses for the over 2,300 acres of often underutilized publicly-owned lands adjacent to the river, which provide an opportunity for a series of accessible open spaces linked by pedestrian and bicycle pathways along the river's edge. HWSG has been identified in the Master Plan as a key location along the river based on the availability of a large parcel of City-owned land, primary road access, and adjacency to Griffith Park and existing trails along the river. Consistent with the goals of the Master Plan, the Headworks Restoration Park would incorporate landscaping reflective of native plant communities and provide educational opportunities regarding local ecosystems and the Los Angeles River, as well as passive open-space recreation uses, including a segment of the Los Angeles River Trail system allowing for future linking to adjacent recreation areas and trails. The park, a portion of which would be developed atop the West Reservoir under the proposed project, would be consistent with the previously established plans to plant the top and sides of the buried concrete reservoir and surrounding areas in HWSG with native vegetation.

## 1.5 Description of Proposed Project

The proposed DPR Demonstration Facility would be located on an undeveloped portion of the project site at the west end of the HWSG property. The proposed WQL would be located on an undeveloped portion of the project site to the east of the DPR Demonstration Facility. The proposed Headworks Restoration Park would be developed in the eastern portion of the project site, atop the West Reservoir, with other park features, including parking, a pavilion building, trails and site landscaping, located in adjacent areas (see Figure 3).


**Legend**

1. Headworks Park (Proposed)
2. Headworks Park - Pavilion Gateway (Proposed)
3. Headworks Park - Parking Lot (Proposed)
4. LA River Trail Segment (Proposed)
5. Access Road (Proposed)
6. Equestrian Tunnel (Existing)
7. Connection to Griffith Park (Existing)
8. Water Quality Lab (Proposed)
9. DPR Demonstration Facility (Proposed)
10. DPR Demonstration Facility Visitor Center (Proposed)
11. East Reservoir (Existing)
12. Flow Control Station (In Construction)

HEADWORKS SITE DEVELOPMENT PROJECT

0 250 500 Feet

Source: ESRI, Nearmap, County of Los Angeles

## Proposed Project Conceptual Site Plan

Figure 3

### 1.5.1 Water Quality Laboratory

The proposed WQL would include approximately 100,000 gross square feet of floor space; surface parking for 12 visitor vehicles, 102 staff vehicles, and 20 LADWP fleet vehicles; a Mobile Laboratory Trailer; landscaping; and other site improvements. The proposed WQL would include both laboratory and office space. The facility may also include a green roof, which would be covered with vegetation to reduce heat and capture stormwater.

The proposed WQL would be organized around a laboratory planning module, allowing for benches, tables, floor-mounted equipment, fume hoods, and biosafety cabinets. The proposed WQL would require multiple areas for the safe storage of materials, chemicals, gases, and wastes, including flammable or corrosive storage rooms, a hazardous chemical waste room, a gas cylinder support room, and a hazardous waste storage room. The proposed WQL would ensure staff safety through once-through (single pass) air systems in lab areas, fume hoods located away from the exits, air handling units for supply air placed away from exhaust fans/stacks, American National Standards Institute compliant combination eyewash and shower safety stations, a central safety and supplies storage room, and safety stations within each lab. The Mobile Laboratory Trailer would have parking apron space and a weather canopy structure and would include a dedicated power feed and local cage structure for cylinder gases while parked on-site.

The proposed WQL would satisfy criteria for an essential facility and would be designed to remain operational for a minimum of seven days after a disaster, the amount of time deemed necessary to maintain support for repairs. The structures and all non-structural components and equipment would be designed to meet occupancy Risk Category IV structural requirements for life safety. Emergency generators powered by diesel fuel and photovoltaic panels with battery storage would be sized for 72 hours of operation at 100 percent load rating. Essential support services would include electric power, potable water, sewage disposal, and food. The non-structural components and systems of the facility would also follow the seismic requirements and guidelines defined in the latest version of the American Society of Civil Engineers 7 reference code and the Los Angeles Building Code.

The conceptual design for the proposed WQL incorporates best management practices and high-performance strategies in several of the major LA Green New Deal (formerly Sustainable City pLAn) target areas for renewable energy, use of local water, and construction of clean and healthy buildings. The facility would have a photovoltaic array on the rooftop of the building. It would also include an internal landscaped courtyard, and may also include a green roof, to conserve water through stormwater capture and treatment. Recycled water from LAGWRP would provide irrigation water for the landscaping, which would be drought-tolerant in the types and use of plant material. The building would achieve energy efficiency by implementing strategies including building orientation, high-performance building envelope, and effective daylighting complemented by high performance lighting and high efficiency heating, ventilation, and air conditioning systems. The proposed WQL would include electric vehicle charging stations in compliance with Los Angeles Department of Building and Safety requirements. It would incorporate recycled material in all aspects of the building construction to promote a sustainable supply chain. All lighting and lighting controls for the facility would comply with the latest version of the Building Energy Efficiency Standard (Title 24) and the California Green Building Standard Code.

### 1.5.2 Direct Potable Reuse Demonstration Facility

As previously discussed, the proposed DPR Demonstration Facility would be an AWPF, using

recycled wastewater from LAGWRP. The proposed DPR Demonstration Facility would serve as a platform for testing specific DPR technologies and strategies and would allow LADWP to engage with the SWRCB DDW in the development of DPR regulations and treatment requirements. In addition to two alternative trains for testing advanced treatment processes, the proposed DPR Demonstration Facility would include a chemical storage area and support areas (e.g., workstations, lockers, breakroom).

The proposed DPR Demonstration Facility would also be used for public outreach and education for the City's water reuse projects, which would be complementary to the overall role that the HWSG property and its facilities play in the City's water supply. As such, a visitor center and a parking lot would be provided. The visitor center would provide a venue for presentations prior to public tours of the AWPF.

The AWPF and its support facilities would be approximately 20,000 square feet, with an additional 20,000 square feet for a surrounding vehicle access road. The visitor center would be approximately 5,000 square feet, with an additional approximately 16,500 square feet for the parking lot to accommodate staff and visitors.

### 1.5.3 Headworks Restoration Park

The proposed Headworks Restoration Park would provide passive recreational uses and educational opportunities regarding local ecosystems and water use. The centerpiece of Headworks Restoration Park would be the West Reservoir Gardens, constructed on top of the approximately 8-acre West Reservoir. As currently designed, the garden would include a series of ramps, landings, and walkways, as well as tree groves and gardens adhering to LA River Improvement Overlay Guidelines. A surface parking lot and a gateway pavilion are proposed near the entry driveway off of Forest Lawn Drive and adjacent to the West Reservoir on the west. The proposed project would also include a series of pedestrian pathways and a bicycle path on the north end of the property. Design and construction of the bicycle path will consider the existing equestrian trail and allow for future connection to the Los Angeles River Trail. Any plantings will adhere to LA River Improvements Overlay Guidelines.

### 1.5.4 Vehicular Access and Traffic

The primary vehicular access to the HWSG site for all the proposed project components would be from Forest Lawn Drive at Mt. Sinai Drive. Modifications to traffic lanes on Forest Lawn Drive would be required to provide a westbound right-turn and an eastbound left-turn lane. These modifications would be accommodated within the existing road right-of-way. Modifications to the existing traffic signal at the intersection of Forest Lawn Drive and Mt. Sinai Drive would also be required. Secondary access for employee, service, and maintenance vehicles would be provided from Forest Lawn Drive at the west end of the HWSG site. A series of interior roads would provide access for the public, employees, maintenance, and emergency vehicles to various locations within the site.

### 1.5.5 Security Features and Lighting

The perimeter of the HWSG would be fenced, and access to the LADWP facilities (i.e., the WQL and the DPR Demonstration Facility) would be fenced to control access. Lighting required for site safety and security at the WQL and DPR Demonstration Facility would be provided. All exterior lights would be full cut off fixtures to prevent spill-over light, and lighting with low color temperature would be used. Minimal site lighting would be provided at Headworks Restoration Park because use of the park, and therefore public access to the HWSG site, would be limited to dawn to dusk.

## 1.6 Project Construction

It is anticipated that the proposed project construction would begin in the fourth quarter of 2024 with the Headworks Restoration Park, which would take approximately 3.3 years to complete, concluding in 2028. The construction of the proposed WQL would begin in the second quarter of 2027, overlapping the last phases of the park construction by approximately 9 months. The proposed WQL construction would take approximately 2.5 years to complete, concluding in the first quarter of 2030. Construction of the proposed DPR Demonstration Facility would follow in succession, starting in the second quarter of 2030 and concluding in the fourth quarter of 2031, a period of approximately 1.5 years. Accounting for overlaps in the construction periods for the project components, the total construction time for the proposed project would be approximately 7 years, from late 2024 to late 2031. The estimated schedule for the project components is shown in Figure 4.

Construction activities would typically occur Monday through Friday during the daytime hours, beginning no earlier than 7:00 a.m. and generally ending by 5:00 p.m. Personnel may arrive on site prior to 7:00 a.m. to conduct safety meetings and other pre-construction activities, but no noise-generating construction activities would occur before 7:00 a.m. Likewise, personnel may remain on site after 5:00 p.m., conducting closeout activities, but noise-generating construction activities would generally not occur after 5:00 p.m., except under unusual circumstances. Construction on Saturdays may also occasionally be necessary but is generally not anticipated. On Saturdays, noise-generating construction activities would not begin before 8:00 a.m. and would normally end by 5:00 p.m. No construction work would occur on Sundays or federal holidays, except under emergency conditions. These limits are consistent with the provisions in the City of Los Angeles Municipal Code regarding construction noise.

Temporary trailers for construction management activities and temporary laydown areas and storage facilities for construction materials and equipment would be required. All administrative, staging, storage, laydown areas, as well as worker parking related to project construction would be located within the existing HWSG property boundaries. Vehicular access to the site during construction would be provided at the gate at the west end of the HWSG property.

The construction of each project component (i.e., Headworks Restoration Park, the WQL, and the DPR Demonstration Facility) would broadly require similar tasks, which would include mobilization and site clearing, excavation and grading, installation of under-slab utilities, foundations and structures, building exteriors and interiors, site work and landscaping (including parking areas), and commissioning and closeout. However, the extent and duration of these tasks would vary between the project components. For example, because of the nature of the proposed WQL (i.e., a building with 100,000 square feet of floor space), the excavation and grading and under-slab utilities tasks would require approximately 8 months to complete, but the similar tasks for the proposed Headworks Restoration Park would require only approximately 4.5 months. Conversely, the site work and landscaping tasks for the proposed Headworks Restoration Park would require approximately 25 months, but the similar tasks for the proposed WQL would require only approximately 4.5 months.

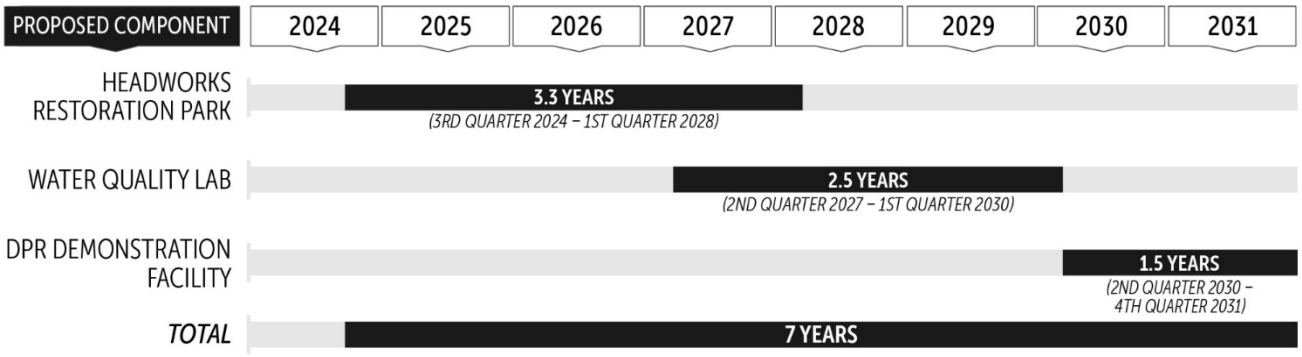


**Figure 4: Proposed Project Construction Schedule**

These various tasks help establish the general level and type of activities and functions associated with project construction, such as excavation, equipment usage, delivery and haul truck trips, and worker commute trips. These represent factors in relation to assessing the nature and extent of certain environmental impacts that may be created during construction of the project.

Each of the project components would be constructed according to an individual schedule that would involve a lower level of activity during project initiation, an increase of activity over time, and a tapering of activity as tasks near completion and the project component enters the commissioning and construction closeout phases. Therefore, across the approximately 7-year project construction schedule, several peaks of construction activity would occur.

The estimated average daily number of on-site workers would peak at 88 for a 3-month period during the park construction, with several secondary peaks of approximately 55 and 60 workers during the 7-year project construction period. Other than these peak months, the average daily number of workers would remain at or below 40 and often fewer than 20. This would include field personnel and supervisory and office staff. It is conservatively assumed for environmental impact analysis purposes that each individual worker would generate a vehicle trip inbound to the project site in the morning and a vehicle trip outbound from the project site at the end of the workday.

The use of heavy equipment, including excavators, bulldozers, scrapers, loaders, sheepsfoot rollers, and backhoes, would be limited primarily to the excavation and grading tasks early in the construction process for the WQL and DPR Demonstration Facility. The use of certain heavy equipment, including excavators, graders, loaders, sheepsfoot rollers, and backhoes, would also be used during the site work and landscaping tasks for Headworks Restoration Park. During the remaining construction tasks for all the project components, primarily smaller equipment, including skid-steers, forklifts, aerial lifts, skip loaders, generators, and welding machines, would be utilized. The estimated average daily number of pieces of on-site equipment would peak at approximately 39 for a 3-month period during park construction. However, for the majority of the 7-year project construction period, the average daily number of pieces of equipment would remain at or below 20.

Large trucks would be required to transport material to and from the project site throughout the construction period. This would include dump trucks to haul excavated material from the site to local landfills or deliver material such as backfill or asphalt, flatbed trucks to deliver large and/or heavier loads, tractor-trailers or box trucks to deliver smaller loads, and concrete trucks. Unlike construction worker commute trips, which would be concentrated during early morning and late

afternoon, truck trips would generally be distributed throughout the workday. The estimated average daily number of off-site truck round-trips would peak at approximately 17 for a 3-month period during park construction. During several months, especially during the overlap between the park and WQL construction, the estimated average daily number of truck trips would exceed ten. However, for the remainder of the 7-year project construction period, the average daily truck trips would remain at or below ten and often fewer than five.

Temporary lane closures may be required during construction of the intersection modifications to provide a westbound right-turn lane and eastbound left-turn lane at Forest Lawn Drive and Mt. Sinai Drive to provide access into the HWSG property. A traffic control plan would be prepared for review and approval by the Los Angeles Department of Transportation (LADOT) prior to project construction and would include such measures as warning signage, speed limits, detours, and flag persons as necessary to minimize disruptions to traffic.

## 1.7 Project Operation

### 1.7.1 Water Quality Laboratory

The proposed WQL would include the following operations:

- Microbiology Section
- Chemistry Section
- Science and Research Section
- Chain of Custody/Laboratory Information Management System/Reporting Section
- Sample Collection Section
- Biology Control Section
- Quality Assurance Section
- Mobile Laboratory

The WQL would operate 7 days a week, 12-hours a day, from 6 a.m. to 6 p.m. Initially, 102 personnel would report to the facility in staggered shifts on weekdays. Of this total, 62 personnel would be transferred from the existing laboratory building in Pasadena, and 5 would be transferred from the Rinaldi Yard in Granada Hills, where the water quality mobile laboratory and support trailers are currently located. Therefore, the proposed WQL would initially require an increase of 35 personnel above the current staffing at the Pasadena lab to perform the laboratory functions required to meet state and federal regulations and ensure drinking water quality. Over time, it is anticipated that the number of personnel at the WQL would increase to a maximum of 172 based on the requirement for additional laboratory procedures and on organizational changes that would involve the transfer of existing management and administrative staff from the LADWP headquarters building in downtown Los Angeles. This increase in personnel may occur over a 10-year period. On weekends, the WQL would maintain operations with a skeleton crew. While most personnel would operate from the laboratory building on a daily basis, some personnel would spend a portion of their day in the field collecting water samples using fleet vehicles from the WQL. Regular deliveries of chemicals and other supplies would be accommodated via the secondary, non-public gate at the west end of the HWSG property. It is anticipated that groups of up to 20 people from outside organizations, other government agencies, or the general public may visit the WQL about twice every month on average.

### 1.7.2 Direct Potable Reuse Demonstration Facility

The AWPF would be designed to receive an average flow of approximately 1.38 MGD of tertiary treated water from LAGWRP. As discussed, this water would be conveyed to HWSG via the existing recycled water line in Forest Lawn Drive, which would require a connection from the street to the AWPF. This influent would be divided between two different treatment trains to test the effectiveness and efficiency of various treatment process for DPR water.

Because the DPR Demonstration Facility is intended to test and verify various advanced treatment technologies and processes and is not approved to supply drinking water, the water processed through the AWPF would not be discharged into the LADWP potable water system. Instead, the water would be continually discharged into the Los Angeles River adjacent to the HWSG. It is anticipated that both trains would utilize micro-filtration, reverse osmosis, and ultraviolet advanced oxidation processes during treatment. Byproducts resulting from these processes, including backwash water used to clean the micro-filtration strainers and membranes and waste solutions from cleaning of the micro-filtration and reverse osmosis equipment, would not be suitable for discharge to the river. These process losses would represent approximately 15 percent of the AWPF influent by volume. Therefore, an average of about 1.17 MGD of water (85 percent of the 1.38 MG of influent) from the AWPF would be discharged to the river at HWSG. Prior to discharge, the reverse osmosis reject water (primarily dissolved solids) would be remixed into the purified water to rebalance the water with minerals, and the water would be dechlorinated.

An average of approximately 0.21 MGD (15 percent of the original AWPF influent) consisting of micro-filtration backwash and cleaning solution water would be returned via the existing sewer system to LAGWRP for processing. The process losses during tertiary treatment of this returned water at LAGWRP would be approximately 18 percent by volume (approximately 0.04 MG) of sludge byproduct, which would be conveyed in the existing sewer system to Hyperion Water Reclamation Plant in El Segundo. The remaining recycled water (approximately 0.17 MG) would be available for discharge to the Los Angeles River at LAGWRP.

The proposed DPR Demonstration Facility would operate 24 hours per day, 7 days per week. Two operators, working on 8-hour shifts, would be present at all times. Facility maintenance personnel for piping, instrumentation, electrical, and mechanical systems would report to the facility during normal weekday hours. A total of approximately five personnel would be present on weekdays.

It is anticipated that groups, including organizations, students, and members of the general public would visit the DPR Demonstration Facility for tours about twice weekly on average.

### 1.7.3 Headworks Restoration Park

The proposed Headworks Restoration Park would be a public park managed and maintained by LARAP. However, LADWP would maintain its access to the reservoirs and appurtenant facilities as necessary for operations and maintenance. The park would be primarily a passive recreation space with no formal active recreation facilities. The West Reservoir Gardens would include promenades and pathways, overlooks, and informal gathering spaces, organized around a series of groves and color-themed gardens consisting of native vegetation. The Reservoir Gardens would provide for activities such as strolling, picnicking, exercising, and educational field trips. A pavilion structure adjacent to the West Reservoir Garden would include picnic tables, park administrative offices, and restrooms.

Another major organizing element of Headworks Restoration Park is the HWSG segment of the

LA River Trail, which would traverse the property from the secondary access gate on the west, across the northern perimeter, utilizing the transmission line right-of-way adjacent to the river. The trail would connect on the east to Forest Lawn Drive and will consider potential future connections to the existing riverside trail to the northeast. Other pedestrian pathways would also be provided within HWSG, surrounding the reservoirs to the west, south, and east.

Stormwater would be captured and utilized to the extent possible to provide water for plants, and irrigation systems would use recycled water from the LAGWRP distribution system routed along Forest Lawn Drive. The park would be open from dawn to dusk, 7 days per week, including holidays, and would be secured by a perimeter fence. Several park personnel may be present during operating hours to provide for maintenance and visitor assistance.

## 1.8 Required Permits and Approvals

Numerous approvals and/or permits would be required to implement the proposed project. This IS/MND would be used to facilitate compliance with federal and state laws and the granting of permits by various state and local agencies having jurisdiction over one or more aspects of the project. These approvals and permits may include, but may not be limited, to the following:

**City of Los Angeles Department of Building and Safety**

- Building permit
- Accessibility review
- Grading and shoring permits
- Haul route permit
- Los Angeles Amendment Green Building Code review

**City of Los Angeles Department of Public Works, Bureau of Engineering**

- ‘A’ Permit
- ‘B’ Permit
- ‘S’ Permit

**City of Los Angeles Department of Public Works, Bureau of Sanitation**

- Standard Urban Storm Water Mitigation Plan during construction
- Low Impact Development (LID) ordinance to manage storm water onsite
- Industrial Wastewater Discharge Permit

**City of Los Angeles Department of Transportation**

- Worksite Traffic Control Plan and Traffic Signal Plan
- Traffic Signal Permit

**City of Los Angeles Department of Cultural Affairs**

- Design Review and Approval

**City of Los Angeles Bureau of Street Services**

- Tree Removal Permit

**Los Angeles County Flood Control District**

- Design Review

**South Coast Air Quality Management District**

- For construction and operation

**State of California State Water Resources Control Board**

- Storm Water Pollution Prevention Plan (SWPPP) for General Construction Permit

**Los Angeles County Fire Department**

- Hazardous Waste Generator Program
- Hazardous Materials Management Program

# 2 ENVIRONMENTAL DETERMINATION

The following discussion of potential environmental effects was completed in accordance with Section 15063(d)(3) of the CEQA Guidelines (2023) to determine if the proposed project may have a significant effect on the environment.

**CEQA INITIAL STUDY FORM**

**Project Title:**
Headworks Site Development Project

**Lead Agency Name and Address:**
Los Angeles Department of Water and Power
Environmental Planning and Assessment
111 North Hope Street, Room 1044
Los Angeles, CA 90012

**Contact Person and Phone Number:**
James Howe
Environmental Planning and Assessment
Los Angeles Department of Water and Power
(213) 367-0414

**Project Sponsor's Name and Address:**
Los Angeles Department of Water and Power
111 North Hope Street
Los Angeles, CA 90012

**Project Location:**
The proposed project would be located within the LADWP HWSG property (6001 West Forest Lawn Drive, Los Angeles, CA 90068) in the Hollywood community of the City of Los Angeles, California.

**General Plan Designation:**
The HWSG property is designated as Open Space in the General Plan.

**Zoning:**
The HWSG property is zoned OS-1XL-H-RIO (Open Space).

**Description of Project:**
The proposed project involves the development of three facilities within the HWSG property: a Water Quality Laboratory (WQL), a Direct Potable Reuse (DPR) Demonstration Facility, and a public park (Headworks Restoration Park). The proposed project would also include roads interior to the HWSG property, surface parking for staff and visitors, landscaping, pedestrian and bicycle pathways, and security lighting and fencing where required.

**Surrounding Land Uses and Setting:**
The surrounding area is characterized by moderate development and mostly open space uses such as parks and cemeteries. The site is adjacent to the Los Angeles River and SR-134 to the north.

## 2.1 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 checklist on the following pages.

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

## 2.2 Environmental Determination

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature 04/24/2024

Date

Jane Hauptman
Manager of Environmental Planning and Assessment
Los Angeles Department of Water and Power

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# 3 ENVIRONMENTAL IMPACT ASSESSMENT

## 3.1 Aesthetics

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

**Discussion**

**a) Except as provided in Public Resources Code Section 21099, would the project have a substantial adverse effect on a scenic vista?**

**No Impact.** Scenic vistas are generally defined as panoramic public views to various natural features, including large water bodies, striking or unusual natural terrain, or unique urban or historic features. Public access to these views may be from park lands, privately- and publicly-owned sites, and public rights-of-way.

There are no areas designated as scenic vistas in the vicinity of the project site.[1] The proposed project would be constructed within the boundaries of the existing HWSG property, a site that has historically been a source for water extraction, storage, and distribution for the City and is highly disturbed. The proposed project would construct the proposed WQL and DPR Demonstration Facility on the western portion of the site, which is currently undeveloped. Headworks Restoration Park would be constructed on top of the existing West Reservoir. Views of the Santa Monica Mountains are available from areas north of the project site, and views of the Verdugo Hills, Santa Susana Mountains, and the San Fernando Valley are available from areas south of the project site. However, the proposed project would not obstruct scenic vistas from these locations. As such, no impacts to scenic vistas would occur.

**b) Except as provided in Public Resources Code Section 21099, would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?**

**Less Than Significant Impact.** There are no state-designated scenic highways in the vicinity of

[1] City of Los Angeles, Department of City Planning. *City of Los Angeles General Plan – Conservation Element*. Available at: https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf. Accessed January 17, 2024.

the project site.[2] However, Forest Lawn Drive, located adjacent to the southern boundary of HWSG, is a City-designated scenic highway.[3] Some trees located within HWSG, along the southern perimeter of the property, may be removed to accommodate proposed project facilities. The trees requiring removal would be determined during final design, but the number is expected to be limited, and no trees would be removed from the public road right-of-way. Therefore, project implementation is not expected to substantially damage scenic resources within the context of the existing visual environment along Forest Lawn Drive, and the impact would be less than significant.

**c) Except as provided in Public Resources Code Section 21099, would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?**

**No Impact.** The project site is located within the boundaries of Griffith Park in the urban setting of Los Angeles and is immediately surrounded by open space uses such as cemeteries, passive park areas, and other recreational facilities. The project site has a General Plan land use designation of OS (Open Space) and is zoned OS-1XL-H-RIO (Open Space). The Headworks Restoration Park component of the project would provide passive open-space recreation areas and is consistent with the zoning designation of the property. The WQL and DPR Demonstration Facility would not be consistent with the site zoning. However, as discussed further in Section 3.11(b), the proposed project would be exempt from zoning review, or any approval process administered by the Department of City Planning, pursuant to City Charter Sections 672 and 675.[4] Additionally, the proposed project would be consistent with the historical use of the property for water extraction, storage, and distribution facilities, which have resulted in highly disturbed conditions at the HWSG property. As such, the proposed project would not conflict with any regulations governing scenic quality at the HWSG site. Therefore, no impact would occur.

**d) Except as provided in Public Resources Code Section 21099, 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.** Implementation of the proposed project would not create a new source of light or glare that would adversely affect day or nighttime views. During the construction period, activities would be limited primarily to daytime hours and any necessary construction lighting would be temporary. As the proposed project would create new development including the WQL, DPR Demonstration Facility, and associated visitor center on a primarily undeveloped property, new light sources for building security and site safety would be introduced into the area. However, all exterior lights would be full cut off fixtures to prevent spill-over light, and lighting with low color temperature would be used. Minimal site lighting would be provided at the proposed Headworks Restoration Park because use of the park, and therefore public access to the HWSG site, would be limited to dawn to dusk. Although new reflective surfaces, such as windows for the

[2] California Department of Transportation. State Scenic Highway Program – Scenic Highway System Lists. Available at: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways. Accessed January 17, 2024.

[3] City of Los Angeles, Department of City Planning. 2016. *Mobility Plan 2035, An Element of the General Plan*. Available at: https://planning.lacity.org/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility_Plan_2035.pdf. Accessed January 17, 2024.

[4] Department of City Planning. Inter-Departmental Correspondence. September 28, 2022.

proposed WQL and DPR Facility, would be introduced with implementation of the proposed project, the project as a whole would not be considered a substantial source of glare in the project area. Therefore, impacts would be less than significant.

## 3.2 Agriculture and Forestry Resources

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| *In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:* | | | | |
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | ☐ | ☐ | ☐ | ☒ |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | ☐ | ☐ | ☐ | ☒ |
| 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))? | ☐ | ☐ | ☐ | ☒ |
| d) Result in the loss of forest land or conversion of forest land to non-forest use? | ☐ | ☐ | ☐ | ☒ |
| e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? | ☐ | ☐ | ☐ | ☒ |

### Discussion

**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.** There is no designated Farmland on or near the project site.[5] Neither the project site nor the surrounding area is designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on the "Important Farmland in California" map prepared by the California Resources Agency pursuant to the Farmland Mapping and Monitoring Program.[6] Therefore, the proposed project would not convert farmland to a non-agricultural use, and no impact would occur.

[5] California Department of Conservation, Division of Land Resource Protection, California Important Farmland Mapper. Available at: https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed January 17, 2024.

[6] Ibid.

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

**No Impact.** The project site, which is completely within the HWSG property, is zoned OS. The City of Los Angeles does not offer Williamson Act contracts.[7] Therefore, the proposed project would not conflict with existing zoning for agricultural use or a Williamson Act contract, and no impact would occur.

**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 project site is not located in an area zoned for forest land, timberland, or Timberland Production as defined in Public Resources Code Section 12220(g) and Government Code Section 4526.[8] Therefore, the proposed project would not conflict with existing zoning for or cause a rezoning of forest land or timberland. No impact would occur.

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

**No Impact.** No portion of the project site is developed for forest land use or located adjacent to forest lands.[9] Therefore, the proposed project would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

**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**. As stated in Section 3.2(a) above, no portion of the project site or surrounding area is identified as Farmland. Additionally, as stated in Section 3.2(d), no portion of the project site or surrounding area is designated as forest land. As such, the proposed project would not change the existing environment in a way that would result in the conversion of Farmland to non-agricultural use or forest land to non-forest use. Therefore, no impact would occur.

7 California Department of Conservation, Division of Land Resource Protection, Williamson Act Finder. Available at: https://maps.conservation.ca.gov/dlrp/WilliamsonAct/. Accessed January 17, 2024.
8 ZIMAS. Available at: http://zimas.lacity.org/. January 17, 2024.
9 Ibid.

## 3.3 Air Quality

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| *Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:* | | | | |
| a) Conflict with or obstruct implementation of the applicable air quality plan? | ☐ | ☐ | ☒ | ☐ |
| b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? | ☐ | ☐ | ☒ | ☐ |
| c) Expose sensitive receptors to substantial pollutant concentrations? | ☐ | ☐ | ☒ | ☐ |
| d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people? | ☐ | ☐ | ☒ | ☐ |

### Discussion

Potential impacts related to air quality associated with the proposed project were determined from the results presented in the Air Quality Impact Study prepared for the proposed project, which is included as Appendix A to this IS/MND.

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

**Less Than Significant Impact.** The South Coast Air Quality Management District (SCAQMD) is the regulatory agency responsible for improving air quality for large areas of Los Angeles, Orange County, Riverside, and San Bernardino Counties. The City of Los Angeles, including the project site, is located within the South Coast Air Basin (Air Basin) which is a distinct geographic subarea within the SCAQMD's jurisdiction. Analyses of the proposed project's consistency with the policies of the SCAQMD CEQA Air Quality Handbook and the City of Los Angeles General Plan Air Quality Element are provided below.

#### SCAQMD CEQA Air Quality Handbook Consistency Analysis

In accordance with the procedures established in SCAQMD's *CEQA Air Quality Handbook*, the impact discussion addresses the following criteria to determine whether the proposed project is consistent with applicable SCAQMD and Southern California Association of Governments (SCAG) planning objectives:

- Would the proposed project create any impacts related to air quality violations, such as:
    - An increase in the frequency or severity of existing air quality violations;
    - Causing or contributing to new air quality violations; or,
    - Delaying timely attainment of air quality standards or the interim emission reductions specified in the Air Quality Management Plan (AQMP).

- Would the proposed project exceed the assumptions utilized in preparing the AQMP:
    - Is the proposed project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
    - Does the proposed project incorporate mitigation measures to reduce potentially significant impacts; and/or
    - To what extent is proposed project development consistent with the AQMP land use policies and control measures?

The first indicator of AQMP consistency is assessed by determining if the proposed project would result in an air quality violation, which would occur when facilities are out of compliance with applicable SCAQMD rule requirements, permit conditions or legal requirements, or with applicable state or federal air pollution regulations. The regional and localized air quality significance thresholds were designed as a screening tool to avoid the potential occurrence and exacerbation of air quality violations resulting from construction and operation of individual projects based on the designation of emissions sources warranting advanced permitting and regulation. The second indicator of AQMP consistency is assessed by determining potential effects of permanent facility operations on population, housing, and employment assumptions that were used in the development of the AQMP, which is based on the SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). If implementation of the proposed project would render the assumptions invalid by introducing growth within the SCAQMD jurisdiction that exceeds projections incorporated into the AQMP, a significant air quality impact may occur.

With respect to the first criterion, as discussed below, localized emissions of nitrogen oxides ($NO_X$ [as a surrogate for $NO_2$]), carbon monoxide (CO), respirable and fine particulate matter ($PM_{10}$ and $PM_{2.5}$, respectively) have been analyzed for the proposed project. Sulfur dioxide ($SO_2$) emissions would be negligible during construction and long-term operations, and therefore, would not have the potential to cause or affect a violation of the $SO_2$ ambient air quality standard. Since volatile organic compounds (VOCs) are not a criteria pollutant, there is no ambient standard or localized threshold for VOCs. Due to the role VOCs play in ozone ($O_3$) formation, it is classified as a precursor pollutant and only a regional emissions threshold has been established.

With respect to the second criterion determining consistency with the 2022 AQMP growth assumptions, the projections in the 2022 AQMP for achieving air quality goals are based on assumptions in SCAG's 2020-2045 RTP/SCS regarding population, housing, and growth trends. The emphasis of this criterion is to ensure that the analyses conducted for the project are based on the same forecasts as the AQMP. The 2020-2045 RTP/SCS includes chapters on: the challenges in a changing region, creating a plan for our future, and the road to greater mobility and sustainable growth. These chapters currently respond directly to federal and state requirements placed on SCAG. Local governments are required to use these as the basis of their plans for purposes of consistency with applicable regional plans under CEQA. For this Project, the City of Los Angeles Land Use Plan defines the assumptions that are represented in the AQMP.

### *Construction*

Criterion 1

The SCAQMD localized emissions analysis serves as a screening method for evaluating whether further assessment of potential air quality violations is warranted. As shown in Table 3-1, the increases in $PM_{10}$ and $PM_{2.5}$ emissions during construction would not exceed the

SCAQMD-recommended localized significance thresholds (LST) values corresponding to the daily disturbance area and proximity of sensitive receptors. Additionally, the maximum potential daily $NO_X$ and CO emissions during construction were analyzed to ascertain potential effects on localized concentrations and to determine if there is a potential for such emissions to cause or affect a violation of an applicable ambient air quality standard. Localized unmitigated emissions of $NO_X$ and CO would not exceed the SCAQMD-recommended LST. Therefore, construction activities would result in a less than significant impact with regard to localized air quality.

**Table 3-1: Proposed Project Construction Emissions**

| Project Component & Construction Activity | Maximum Daily Emissions (Pounds Per Day) | | | | | |
|---|---|---|---|---|---|---|
| | VOC | $NO_X$ | CO | $SO_X$ | $PM_{10}$ | $PM_{2.5}$ |
| **HEADWORKS RESTORATION PARK – SITE CLEARING** | | | | | | |
| On-Site Emissions | 1.4 | 13.3 | 17.5 | <0.1 | 3.9 | 0.8 |
| Off-Site Emissions | 0.3 | 1.0 | 4.3 | <0.1 | 1.0 | 0.2 |
| **Total[a]** | **1.7** | **14.3** | **21.8** | **<0.1** | **4.9** | **1.0** |
| **HEADWORKS RESTORATION PARK –GRADING & UTILITIES** | | | | | | |
| On-Site Emissions | 4.3 | 38.3 | 52.9 | <0.1 | 9.5 | 2.2 |
| Off-Site Emissions | 0.5 | 1.3 | 8.0 | <0.1 | 1.6 | 0.4 |
| **Total[a]** | **4.8** | **39.6** | **60.9** | **<0.1** | **11.1** | **2.6** |
| **HEADWORKS RESTORATION PARK –PAVILION & BRIDGES** | | | | | | |
| On-Site Emissions | 2.4 | 20.2 | 30.7 | <0.1 | 10.4 | 1.8 |
| Off-Site Emissions | 0.7 | 1.7 | 11.5 | <0.1 | 2.3 | 0.6 |
| **Total[a]** | **3.1** | **21.9** | **42.3** | **<0.1** | **12.7** | **2.4** |
| **HEADWORKS RESTORATION PARK – PAVING & LANDSCAPING** | | | | | | |
| On-Site Emissions | 1.2 | 10.8 | 15.7 | <0.1 | 9.7 | 1.3 |
| Off-Site Emissions | 0.4 | 0.8 | 5.8 | <0.1 | 1.4 | 0.3 |
| **Total[a]** | **1.6** | **11.5** | **21.6** | **<0.1** | **11.1** | **1.7** |
| **WQL – SITE CLEARING** | | | | | | |
| On-Site Emissions | 3.7 | 32.4 | 35.5 | <0.1 | 7.8 | 2.9 |
| Off-Site Emissions | 0.1 | 1.0 | 2.2 | <0.1 | 0.6 | 0.2 |
| **Total[a]** | **3.8** | **33.4** | **37.7** | **<0.1** | **8.5** | **3.0** |
| **HEADWORKS RESTORATION PARK – PAVING & LANDSCAPING + WQL – SITE CLEARING** | | | | | | |
| On-Site Emissions | 5.0 | 43.2 | 51.3 | 0.1 | 17.5 | 4.2 |
| Off-Site Emissions | 0.5 | 1.8 | 8.0 | <0.1 | 2.0 | 0.5 |
| **Total[a]** | **5.5** | **45.0** | **59.3** | **0.1** | **19.5** | **4.7** |
| **WQL - GRADING** | | | | | | |
| On-Site Emissions | 1.9 | 16.2 | 22.2 | 0.1 | 5.7 | 1.0 |
| Off-Site Emissions | 0.2 | 1.1 | 2.4 | <0.1 | 0.7 | 0.2 |
| **Total[a]** | **2.1** | **17.3** | **24.6** | **0.1** | **6.4** | **1.2** |
| **WQL – BUILDING CONSTRUCTION** | | | | | | |
| On-Site Emissions | 0.9 | 11.2 | 14.0 | <0.1 | 6.2 | 0.8 |
| Off-Site Emissions | 0.2 | 0.4 | 3.4 | <0.1 | 0.8 | 0.2 |
| **Total[a]** | **1.1** | **11.6** | **17.4** | **<0.1** | **7.0** | **1.0** |
| **WQL - LANDSCAPING** | | | | | | |
| On-Site Emissions | 11.7 | 16.9 | 21.7 | <0.1 | 8.1 | 1.4 |
| Off-Site Emissions | 0.5 | 1.2 | 8.7 | <0.1 | 2.3 | 0.6 |
| **Total[a]** | **12.2** | **18.1** | **30.3** | **<0.1** | **10.3** | **2.0** |

**Table 3-1: Proposed Project Construction Emissions**

| Project Component & Construction Activity | Maximum Daily Emissions (Pounds Per Day) | | | | | |
|---|---|---|---|---|---|---|
| | VOC | $NO_X$ | CO | $SO_X$ | $PM_{10}$ | $PM_{2.5}$ |
| **DPR DEMO FACILITY – SITE PREPARATION** | | | | | | |
| On-Site Emissions | 1.1 | 8.2 | 12.2 | <0.1 | 5.3 | 0.8 |
| Off-Site Emissions | <0.1 | 0.1 | 1.7 | <0.1 | 0.1 | <0.1 |
| **Total[a]** | **1.1** | **8.2** | **13.9** | **<0.1** | **5.4** | **0.8** |
| **DPR DEMO FACILITY – GRADING & FOUNDATION** | | | | | | |
| On-Site Emissions | 2.7 | 21.8 | 29.9 | <0.1 | 8.8 | 2.3 |
| Off-Site Emissions | 0.1 | 0.8 | 1.8 | <0.1 | 0.6 | 0.2 |
| **Total[a]** | **2.8** | **22.5** | **31.6** | **<0.1** | **9.4** | **2.5** |
| **DPR DEMO FACILITY – BUILDING CONSTRUCTION** | | | | | | |
| On-Site Emissions | 1.2 | 12.1 | 17.6 | <0.1 | 10.6 | 1.3 |
| Off-Site Emissions | 0.3 | 0.7 | 4.2 | <0.1 | 1.2 | 0.3 |
| **Total[a]** | **1.5** | **12.8** | **21.8** | **<0.1** | **11.8** | **1.6** |
| **DPR DEMO FACILITY – PAVING & LANDSCAPING** | | | | | | |
| On-Site Emissions | 2.5 | 13.1 | 17.5 | <0.1 | 9.7 | 1.3 |
| Off-Site Emissions | 0.5 | 0.7 | 7.3 | <0.1 | 2.4 | 0.6 |
| **Total[a]** | **3.0** | **13.8** | **24.9** | **<0.1** | **12.1** | **1.9** |
| **REGIONAL ANALYSIS** | | | | | | |
| **Maximum Daily Emissions** | **12.2** | **45.0** | **59.3** | **0.1** | **19.5** | **4.7** |
| Regional Significance Threshold | 75 | 100 | 550 | 150 | 150 | 55 |
| **Exceed Threshold?** | **No** | **No** | **No** | **No** | **No** | **No** |
| **LOCALIZED ANALYSIS** | | | | | | |
| **Maximum On-Site Emissions** | **--** | **43.2** | **51.3** | **--** | **17.5** | **4.2** |
| LST Screening Value[b] | -- | 111 | 1,068 | -- | 21 | 6 |
| **Exceed Threshold?** | **--** | **No** | **No** | **--** | **No** | **No** |

a. Totals may be off due to rounding.

b. LST screening values correspond to a construction site in Source Receptor Area (SRA) 7 with a two-acre daily disturbance area and sensitive receptors within 50 meters.

Emissions modeling files can be found in Appendix A.

Criterion 2

Construction of the proposed project would result in increased employment opportunities in the construction industry. However, it is not likely that construction workers would relocate their households as a result of their employment associated with construction. The construction industry differs from other employment sectors in that many construction workers are highly specialized and move from job site to job site as dictated by the demand for their skills, and they remain at a job site for only the timeframe in which their specific skills are needed to complete a particular phase of the construction process. Furthermore, it is likely that the construction workers employed for construction would be taken from the ample skilled labor pool currently residing in the region. Thus, the construction phase of the proposed project would be temporary and would not create permanent growth in population, housing, or employment within the City or within SCAQMD jurisdiction. Therefore, construction of the proposed project would have no impact on regional growth projections accounted for in AQMP and RTP/SCS.

### *Operation*

Criterion 1

The proposed project would not introduce any substantial stationary sources of emissions (e.g., gasoline stations, dry cleaners, chrome plating operations), and as such, CO is the preferred benchmark pollutant for assessing local area air quality impacts from post-construction motor vehicle operations. As indicated below, under the analysis in Section 3.3(c), no intersections would require a CO hotspot analysis. Therefore, the proposed project would not increase the frequency or severity of an existing CO violation or cause or contribute to new CO violations, and impacts would be less than significant.

Criterion 2

The following discussion presents an analysis of the proposed project's consistency with the three components of criterion 2 of the SCAQMD CEQA Air Quality Handbook.

- Is the proposed project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based?

The proposed project components would not include housing resulting in a new permanent population. The purpose of the proposed WQL is to replace the existing obsolete LADWP laboratory facility. The WQL is expected to operate from 6 a.m. to 6 p.m. on a daily basis. On weekdays, 102 personnel would initially report to the facility in staggered shifts. Of the initial 102 personnel, 67 personnel would be transferred from the existing laboratory building in Pasadena and the Rinaldi Yard in Granada Hills, where the water quality mobile laboratory and support trailers are currently located. Over time, up to 172 personnel may ultimately report to the facility. This increase may occur over approximately ten years and would include personnel transferring from other LADWP locations. The DPR Demonstration Facility would include a total of approximately five (5) personnel on weekdays. Only a small number of permanent employees would be associated with the proposed Headworks Restoration Park. The number of new employees associated with the proposed WQL, DPR Demonstration Facility, and Headworks Restoration Park would represent a small portion of the City of Los Angeles subregion employment projections and would be within the regional forecast estimates of the 2020-2045 RTP/SCS. There is no potential for the proposed project to interfere with employment projections. The proposed project would be consistent with the projections in the AQMP.

- Does the proposed project incorporate mitigation measures to reduce potentially significant impacts?

As shown in the analyses in Section 3.3, Air Quality, the proposed project would not result in potentially significant impacts related to air quality; therefore, no mitigation measures are required to reduce air quality impacts. The proposed project would comply with all applicable regulatory standards (e.g., SCAQMD Rule 403, etc.) as required by SCAQMD. The proposed project would also incorporate project design features to support and promote environmental sustainability, such as complying with 2022 Title 24 standards and the use of a photovoltaic array on the roof of the proposed WQL building. While these features are designed primarily to reduce greenhouse gas (GHG) emissions, they would also serve to reduce emissions from criteria air pollutants. Thus, the proposed project would be consistent with this portion of Criterion 2.

- To what extent is proposed project development consistent with the AQMP land use policies and control measures?

The 2020-2045 RTP/SCS builds upon and expands land use and transportation strategies established over several prior planning cycles to increase mobility options and achieve a more sustainable growth pattern. The 2020-2045 RTP/SCS includes strategies and tools consistent with local jurisdictions' land use policies that incorporate best practices for achieving the state-mandated reductions in pollutant emissions at the regional level through reduced vehicle miles traveled (VMT). The proposed project would consolidate employees from the existing LADWP laboratory building in Pasadena and the LADWP Rinaldi Yard in Granada Hills to the proposed new WQL, which would result in a reduction in commute distances over time (refer to the VMT analysis in Section 3.17(b)). The proposed project also represents an infill project that would provide new publicly accessible recreational amenities at the project site. As such, the proposed project would be consistent with the following land use strategies that were developed to support the 2020 RTP/SCS:

- Emphasize land use patterns that facilitate multimodal access to work, educational, and other destinations.
- Focus on a regional jobs/housing balance to reduce commute times and distances.
- Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods.

**City of Los Angeles General Plan Air Quality Element Consistency Analysis**

The Air Quality Element of the City's General Plan was adopted on November 24, 1992, and sets forth the goals, objectives, and policies, which guide the City in the implementation of its air quality improvement programs and strategies. The Air Quality Element establishes the following six goals:

- Good air quality in an environment of continued population growth and healthy economic structure;
- Less reliance on single-occupant vehicles with fewer commute and non-work trips;
- Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand-management techniques;
- Minimal impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation and air quality;
- Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels and the implementation of conservation measures including passive measures such as site orientation and tree planting; and
- Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

The Air Quality Element acknowledges the interrelationships among transportation and land use planning in meeting the City's mobility and air quality goals. To achieve the goals of the Air Quality Element, performance-based standards have been adopted to provide flexibility in implementation of its policies and objectives. The proposed project would promote the City of Los Angeles General Plan Air Quality Element goals discussed above. The proposed project represents an infill development project within an existing urbanized area that would concentrate multiple LADWP facilities in one location. The proposed project would also provide active transportation options. Surrounding Headworks Restoration Park and extending into other portions of the HWSG property would be a series of pedestrian pathways. A bicycle trail would be

constructed along the northern side of the property, allowing for future interconnections with Griffith Park and the existing river trail system via existing tunnels beneath Forest Lawn Drive and SR-134 at the east end of the HWSG property. The proposed project would be designed and constructed to meet 2022 Title 24 standards. In addition, the WQL would be designed to meet the Mayor's Resilience by Design Directive by seeking to obtain LEED Gold certification, with the objective of achieving LEED Platinum certification and Envision Sustainable Infrastructure certification. The WQL may include a green roof, which would be covered with vegetation to reduce heat and capture stormwater; a photovoltaic array on the rooftop of the building; and an internal landscaped courtyard to conserve water through stormwater capture and treatment. The WQL would be designed to achieve energy efficiency by implementing strategies including building orientation, high-performance building envelope, and effective daylighting complemented by high performance lighting and high efficiency HVAC systems. The proposed project is consistent with applicable policies of the City of Los Angeles Air Quality Element.

**Conclusion**

The proposed project would be consistent with the AQMP as well as the City of Los Angeles plans and policies. The determination of AQMP consistency is primarily concerned with the long-term influence of the proposed project on air quality in the Air Basin. As discussed above, the proposed project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for these pollutants. As the proposed project would not exceed any of the State and federal standards, the proposed project would also not delay the timely attainment of air quality standards or interim emission reductions specified in the AQMP. In addition, because the proposed project is consistent with growth projections that form the basis of the 2022 AQMP, the proposed project would be consistent with the emissions forecasts in the AQMP. Furthermore, the proposed project does not require the implementation of any air quality mitigation measures, and it would comply with all applicable regulatory standards and would incorporate project design features that would serve to reduce the criteria air pollutants. Thus, the proposed project would not conflict with or obstruct implementation of the AQMP. With regard to City policies, as discussed above, the proposed project would serve to implement applicable policies of the City pertaining to air quality. Therefore, impacts would be less than significant.

**b) 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?**

**Less Than Significant Impact.** The Los Angeles County portion of the Air Basin is presently designated as nonattainment under either the federal or state ambient air quality standards for $O_3$, $PM_{10}$, and $PM_{2.5}$. Therefore, there is an ongoing regional cumulative impact associated with these air pollutants. The SCAQMD published guidance addressing the evaluation of potential cumulative impacts for CEQA projects. According to this guidance, if construction or operation of a project would produce maximum daily emissions exceeding the applicable project-specific thresholds, those emissions would also be considered cumulatively significant. For this reason, the SCAQMD applies the same project-level thresholds to cumulative assessments. Conversely, if construction and operation of a project would not generate emissions of sufficient quantity to exceed any of the applicable mass daily thresholds, then that project and its associated emissions would be considered less than significant in the cumulative context.

**Construction**

Construction activities have the potential to create air quality impacts through emissions

generated using heavy-duty construction equipment and through vehicle trips associated with construction worker commutes and haul and delivery vehicles traveling to and from the project site. Fugitive dust emissions would primarily result from site preparation (e.g., excavation and grading) activities. It is mandatory for all construction projects in the Air Basin to comply with SCAQMD Rule 403 for Fugitive Dust, which requires measures to prevent the generation of visible dust plumes such as applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system, and maintaining effective cover over exposed areas. Compliance with Rule 403 would reduce fugitive $PM_{2.5}$ and $PM_{10}$ emissions associated with construction activities by approximately 61 percent. $NO_X$ emissions would predominantly result from the use of construction equipment and haul truck trips. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

The air quality analysis focuses on maximum daily emissions during construction activities. It is unlikely that the maximum number of daily haul truck loads would be required throughout the duration of each activity. Project-specific emissions were assessed based on the schedule of construction activities and the equipment inventory required. The regional analysis shown in Table 3-1, above in Section 3.3(a), identifies the maximum daily emissions that would occur during construction of the proposed project components and compares those emissions to the applicable SCAQMD regional mass daily threshold of significance. Daily construction activities would fluctuate throughout the 7-year construction period, and the maximum daily emissions identified in Table 3-1 that are compared to the regional thresholds do not represent emissions that would be occurring every day of construction. As previously discussed, and shown in Table 3-1, construction emissions associated with the proposed project would not exceed the SCAQMD significance thresholds. Therefore, construction emissions associated with proposed project implementation would not result in cumulatively considerable net increases of nonattainment pollutants at the regional level, and this impact would be less than significant.

As previously discussed, SCAQMD recommends the evaluation of localized air quality impacts to sensitive receptors in the immediate vicinity of the proposed project site. The SCAQMD localized thresholds and LST screening values are based on applicable short-term state and federal ambient air quality standards, as well as existing air quality at the time of the LST methodology development. Project-related localized construction impacts are evaluated based on the SCAQMD LST methodology which accounts for ambient pollutant concentrations. Based on SCAQMD guidance, localized emissions from on-site sources that exceed LST screening values would also be cumulatively considerable and could contribute to instances of the air quality standards being exceeded. As shown in Table 3-1, above, maximum daily localized emissions during construction activities would remain below the applicable SCAQMD LST screening values without mitigation. Therefore, construction emissions associated with proposed project implementation would not result in cumulatively considerable net increases of nonattainment pollutants at the localized level, and this impact would be less than significant.

**Operation**

The proposed project would generate regional operational emissions from vehicle trips, area sources, and energy use. The California Emissions Estimator Model (CalEEMod) was used to estimate daily operational air pollutant emissions using the project-specific trips and VMT, as well as land use data obtained from the site plans. A VMT analysis was completed for the proposed project (refer to the analysis in Section 3.17(b)). For VMT impacts for a land use project, CEQA requires the identification of impacts based on whether the project conflicts, or is inconsistent with, CEQA Guidelines Section 15064.3, subdivision (b)(1). The City has developed screening criteria

to identify when a detailed analysis is required for projects. The City's guidelines state that public services (e.g., police, fire stations, public utilities, public parks) do not generally generate substantial VMT. Instead, these land uses are often built-in response to development from other land uses (e.g., office and residential). Therefore, these land uses can be presumed to result in less than significant impacts related to VMT. The proposed project includes a public park and a water treatment facility, which are public services that are presumed to have a less than significant VMT impact. Therefore, these components of the project are screened out from analysis. The WQL, although an LADWP function, would not meet the traditional definition of a public service since it would serve as a laboratory and administrative facility that would generate daily employee trips in excess of 250, the threshold that triggers the need for a VMT analysis.

In order to evaluate the VMT per employee for the WQL, the net change in VMT per employee was calculated. Based on this analysis (see Section 3.17(b)), the net change in VMT is 1,051 miles, which results in a net VMT of 6.11 miles per employee, which represents a reduction in VMT/employee from existing conditions.

Table 3-2 presents the CalEEMod results for operational emissions estimates of the proposed project. As shown in Table 3-2, daily emissions of ozone precursors and criteria pollutants would be below the SCAQMD operational thresholds. Operational activities would not result in a new substantial source of air pollutant emissions. Therefore, the air quality impact related to the creation or exacerbation of air quality violations within the SCAQMD jurisdiction would be less than significant during project operation.

**Table 3-2: Proposed Project Operational Emissions**

| Operational Activity | Maximum Daily Emissions (Pounds Per Day) | | | | | |
|---|---|---|---|---|---|---|
| | VOC | $NO_X$ | CO | $SO_X$ | $PM_{10}$ | $PM_{2.5}$ |
| **EMISSIONS ANALYSIS** | | | | | | |
| Area Sources | 4.2 | <0.1 | 5.4 | <0.1 | <0.1 | <0.1 |
| Energy Sources | <0.1 | 0.7 | 0.6 | <0.1 | <0.1 | <0.1 |
| Mobile Sources | 1.4 | 0.6 | 5.7 | <0.1 | 1.0 | 0.4 |
| **IMPACT ANALYSIS** | | | | | | |
| **Maximum Daily Operational Emissions** | **5.5** | **1.3** | **11.7** | **<0.1** | **1.1** | **1.2** |
| Regional Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| **Exceed Threshold?** | **No** | **No** | **No** | **No** | **No** | **No** |

Emissions modeling files can be found in Appendix A.
Source: TAHA, 2024.

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

**Less Than Significant Impact.**

**Construction**

***Criteria Pollutants***

As discussed previously, the localized construction air quality analysis was conducted using the LST methodology recommended by the SCAQMD. The SCAQMD has published look-up tables with daily mass emissions screening values that correspond to a project's source receptor area (SRA), the area of maximum daily ground disturbance during construction, and the proximity of sensitive receptors to the project site. The LST screening values represent the maximum

allowable emissions from a project that are not expected to cause or contribute to ambient air quality standards being exceeded. Maximum daily on-site unmitigated construction emissions were estimated in CalEEMod and are presented in Table 3-1, above. Also presented are the applicable LST screening values for a project with maximum daily disturbance of two acres in SRA 7 that is within approximately 165 feet (50 meters) of sensitive receptors. Construction of the proposed project would not result in localized emissions exceeding any applicable SCAQMD LST screening value, even in the unmitigated condition. Therefore, emissions from on-site sources during construction would not have the potential to expose nearby sensitive receptors to substantial pollutant concentrations and this impact would be less than significant.

### *Toxic Air Contaminants*

The greatest potential for toxic air contaminants (TAC) emissions during construction would be from diesel particulate emissions associated with heavy equipment operations. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. “Individual Cancer Risk” is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology. The SCAQMD’s CEQA guidance does not require a health risk assessment (HRA) for short-term construction emissions The proposed project would not result in a long-term (i.e., 70-year) source of TAC emissions given the short-term construction schedule of approximately 7 years. Although the total construction duration would be 7 years, periods of intense emissions from heavy equipment or truck activity would be intermittent and spread across the 43-acre property. Additionally, there are no receptors adjacent to construction activities with the nearest sensitive receptors being residences located approximately 325 feet to the north. Construction activities associated with the proposed project, including generation of TACs, would not expose sensitive receptors to substantial pollutant concentrations. Project-related TAC impacts during construction would be less than significant.

## Operation

### *Criteria Air Pollutants*

Operation of the proposed project would not include any major new sources of air pollution. Emissions estimates for criteria air pollutants from on-site sources during project operation are presented in Table 3-2, above. Maximum on-site daily operational emissions were calculated using CalEEMod and compared to the applicable SCAQMD LSTs as defined above. Operational emissions of CO and $NO_x$, as well as nonattainment pollutants $PM_{10}$, and $PM_{2.5}$ would remain below applicable SCAQMD thresholds. Therefore, long-term operations would result in a less than significant impact related to localized pollutant concentrations from on-site sources.

### *CO “Hot Spots” Analysis*

In the 1992 CO Plan, a CO hot spot analysis was conducted for four busy intersections in Los Angeles at the peak morning and afternoon time periods. The busiest intersection evaluated was that at Wilshire Boulevard and Veteran Avenue. The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm, which indicates that the most stringent 1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day.[10] Consistent with the SCAQMD’s localized CO concentration analysis methodology, if a subject intersection does not exceed 400,000 vehicles

[10] Based on extrapolation of the ratio of the CO standard (20.0 ppm) and the modeled value (4.6 ppm).

per day, then the project does not need to prepare a detailed CO hot spot analysis. There are no intersections near the project site that have volumes that exceed 400,000 vehicles per day. In addition, CO background concentrations within the vicinity of the modeled intersection[11] have substantially decreased since preparation of the 2003 AQMP[12] primarily due to ongoing fleet turnover of older light duty vehicles and production of higher fuel efficiency vehicles. Therefore, the proposed project does not trigger the need for a detailed CO hot spots analysis and would not have the potential to result in elevated CO concentrations at nearby intersections. Off-site mobile source emissions would not expose sensitive receptors to substantial pollutant concentrations, and this impact would be less than significant.

***Toxic Air Contaminants***

When considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within close proximity of land uses that emit TACs. The California Air Resources Board (CARB) has published and adopted the Air Quality and Land Use Handbook: A Community Health Perspective, which provides recommendations regarding the siting of new sensitive land uses near potential sources of toxic air emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities). SCAQMD adopted similar recommendations in its Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. Together, CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources and the addition of new TAC sources in proximity to existing sensitive land uses. Sensitive land uses, such as schools, convalescent facilities, and hospitals, are those where users or occupants could be subject to chronic exposure if sited near TAC sources. The proposed project does not include the development of sensitive land uses. As such, an assessment of siting distances from potential TAC sources is not required.

The primary source of potential air toxics associated with operations include diesel particulate matter (DPM) from delivery trucks (e.g., truck traffic on local streets and idling on adjacent streets) and, to a lesser extent, facility operations. However, these activities, and the land uses associated with the proposed project, are not considered land uses that generate substantial TAC emissions. The SCAQMD recommends that health risk assessments be conducted for substantial individual sources of DPM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing mobile source diesel emissions. The proposed project would not include these types of land uses and is not considered to be a substantial source of DPM since daily trucks would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. In addition, the CARB-mandated Airborne Toxic Control Measures limits diesel-fueled commercial vehicles (delivery trucks) to idle no more than five minutes at any given time, which would further limit diesel particulate emissions.

Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes (e.g., chrome plating, electrical manufacturing, petroleum refinery). The proposed project would not include these types of potential industrial manufacturing process sources. It is expected that the quantities of hazardous TACs generated on-site (e.g., cleaning solvents, paints, landscape pesticides, etc.) for the types of land uses proposed would be below thresholds

[11] "Modeled intersection" refers to Wilshire Boulevard/Veteran Avenue.

[12] 2003 AQMP is referenced because that is when the SCAQMD demonstrated that the region was in attainment of the Carbon Monoxide (CO) National Ambient Air Quality Standards (NAAQS). The United States Environmental Protection Agency accepted and approved the analysis and the region was designated as attainment of the CO NAAQS.

warranting further study under the California Accidental Release Program. In addition, the proposed project would result in minimal emissions of TACs from the use of landscape maintenance activities, among other things. As a result, toxic or carcinogenic air pollutants are not expected to occur in any meaningful amounts during operation of the proposed project. As such, impacts on human health would be less than significant.

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

**Less Than Significant Impact.**

**Construction**

Other than the sources addressed above, odors are the only other potential construction emissions. A significant impact would occur if construction activities would result in the creation of nuisance odors that would be noxious to a substantial number of people. The proposed project would utilize typical construction techniques, and the odors would be typical of most construction sites. Potential sources that may produce objectionable odors include equipment exhaust, application of asphalt and architectural coatings, and other interior and exterior finishes. Odors from these sources would be localized and generally confined to the immediate area surrounding the project site. As construction-related emissions dissipate with distance from the construction area, the odors associated with these emissions would also be diluted and decrease. Additionally, construction odors would be temporary in nature and would not persist beyond the termination of construction activities. Therefore, construction of the proposed project would result in a less than significant impact related to other emissions.

**Operation**

According to the SCAQMD CEQA Air Quality Handbook, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed WQL and Headworks Restoration Park would not include any of the land uses or operations associated with odors. The proposed DPR Demonstration Facility would use recycled wastewater from LAGWRP. However, recycled wastewater is not odorous. Therefore, operation of the proposed project would result in a less than significant impact related to odors.

## 3.4 Biological Resources

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| *Would the project:* | | | | |
| a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? | ☐ | ☒ | ☐ | ☐ |
| 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 US Fish and Wildlife Service? | ☐ | ☐ | ☒ | ☐ |
| c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | ☐ | ☐ | ☒ | ☐ |
| 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? | ☐ | ☐ | ☒ | ☐ |
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | ☐ | ☐ | ☒ | ☐ |
| 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? | ☐ | ☐ | ☐ | ☒ |

### Discussion

Potential impacts to biological resources associated with the proposed project were determined from the results presented in the Biological Resources Memorandum prepared for the proposed project, which is included as Appendix B to this IS/MND.

Thorough literature reviews and records searches were conducted to determine which special-status biological resources have the potential to occur on or within the general vicinity of the project site. A field survey was conducted on October 14, 2021, to document existing conditions and determine the potential for special-status plant and wildlife species to occur within the project site. The Biological Study Area (BSA) assessed for potential impacts resulting from the proposed project includes the HWSG property and a 500-foot buffer around the property. Impacts to biological resources can be both direct, which would occur only in the area of disturbance within the HWSG property, and indirect. Indirect impacts could include elevated noise and dust levels, soil compaction, and increased human activity, and could occur both within and outside the HWSG property. It is anticipated that indirect impacts beyond 500 feet from the HWSG property would not significantly affect resources.

**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 Wildlife or U.S. Fish and Wildlife Service?**

**Less Than Significant Impact with Mitigation Incorporated.** A significant impact could occur if the proposed project removed or modified the habitat for, or otherwise directly or indirectly affected, any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS).

**Sensitive Plant Species**

Special-status plant species include those listed as Endangered, Threatened, Rare or those species proposed for listing by the USFWS under the Federal Endangered Species Act (FESA) and CDFW under the California Endangered Species Act (CESA). The California Native Plant Society (CNPS) inventory is sanctioned by the CDFW and essentially serves as the list of candidate plant species for state listing. CNPS's California Rare Plant Ranks (CRPR) 1B and 2B species are considered eligible for state listing as endangered or threatened.

The footprints of the three proposed project components are composed almost entirely of bare ground, with some areas of concrete, and are generally devoid of vegetation. Extensive areas of bare ground also occur within the surrounding areas within the HWSG property, where previous construction and equipment and materials staging has occurred. However, remnant native habitats, non-native vegetation, and ruderal species common in urbanized and previously disturbed areas are present in isolated areas of the HWSG property. Remnant native vegetation occurs primarily along the southern perimeter of the HWSG property, adjacent to Forest Lawn Drive, where stands of native arroyo willow (*Salix lasiolepis*), black willow (*S. gooddinggii*), and toyon (*Heteromeles arbuitifolia*) are located south of the West Reservoir, and a stand of native laurel sumac (*Malosma laurina*) and blue elderberry (*Sambucus nigra spp. cerulea*) south of the proposed DPR Demonstration Facility. These stands of vegetation are small and are isolated from any larger community of natural vegetation by surrounding development. Native coast live oak (*Quercus agrifolia*), western sycamore (*Platanus racemosa*), and Monterey pine (*Pinus radiata*) trees also occur within the BSA.

Non-native trees occurring within the BSA were noted during the field survey, including primarily mature aleppo pine (*Pinus halephsis*) trees along the north side of Forest Lawn Drive. Canary Island pine (*P. canariensis*) trees also occur on the HWSG property, as well as other ornamental species typical of urbanized areas. Portions of Forest Lawn Memorial Park and Mount Sinai Memorial Park are within the BSA along the south side of Forest Lawn Drive and contain mature non-native ornamental trees and large areas of lawn.

Along the northern edge of the HWSG property, adjacent to the Los Angeles River channel, an approximate 40- to 50-foot wide strip of low-growing vegetation is present within an electrical transmission corridor containing transmission towers. A mix of native and non-native species occur within the corridor, including native deerweed (*Acmisopon glaber*), coast goldenbush (*Isocoma menziesii*), and cudweed (*Pseudognaphalium* sp.), and non-native black mustard (*Brassica nigra*), short-pod mustard (*Hirshfeldia incana*), and Russian thistle (*Salsola tragus*). Landscape trees also occur in the northern portion of the BSA, adjacent to the SR-134 Freeway, across the river channel from the HWSG property.

In addition to the vegetation described above, patches of ruderal vegetation have also colonized previously-disturbed areas within the HWSG property. Mustards, coast goldenbush, tree tobacco (*Nicotiana glauca*), castor bean (*Ricinus communis*), and other native and non-native opportunistic species were observed in these areas.

No special-status plants were observed during the field survey. A historical record of one special-status species, Parish's brittlescale (*Atriplex parishii*), a CNPS-listed species with a California Rare Plant Rank of 1B.1 (Plants rare, threatened, or endangered in California and elsewhere, seriously threatened in California) coincides with the BSA. The record indicates an undated collection from along the northern foot of the Santa Monica Mountains. This species was not documented on site during the field survey, and habitat potentially suitable to support this species (alkali meadows, vernal pools, chenopod scrub, playas) no longer occur within the BSA. As such this species is considered extirpated from the BSA.

No USFWS-designated critical habitat for any special-status plant species coincides with the BSA. The nearest critical habitat is located approximately 8 miles north of the BSA at Hansen Dam. Based on the results of the literature review and field surveys, special-status plant species are generally not anticipated to occur within the BSA, or have a low potential to occur within the BSA based on existing site conditions and a review of specific habitat requirements, occurrence records, and known distributions of each species.

### *Construction*

Individual plant species could be damaged or destroyed from crushing or trampling or from indirect impacts (e.g., dust) during construction activities. However, no federal or state-listed special-status plant species were identified during the field survey, and special-status plants are not expected to occur in the BSA due to a lack of potentially suitable habitat. As a result, there would be no direct and indirect impacts to special-status plants during project construction.

### *Operation*

As discussed previously, special-status plant species do not occur at the project site or in the surrounding area due to existing site conditions and lack of suitable habitat present in the BSA. Therefore, there would be no direct or indirect impacts to special-status plant species during project operation.

### Sensitive Wildlife Species

Special-status wildlife species include those listed as Endangered, Threatened, Rare or those species proposed for listing by the USFWS under the FESA and CDFW under the CESA. Additional species receive federal protection under the Bald Eagle Protection Act (e.g., bald eagle, golden eagle), the Migratory Bird Treaty Act (MBTA), and state protection under CEQA Section 15380(d).

All birds, except European starlings, English house sparrows, rock doves (pigeons), and non-migratory game birds such as quail, pheasant, and grouse are protected under the MBTA. However, non-migratory game birds are protected under California Fish and Game Code (CFGC) Section 3503. Many other species are considered by CDFW to be California Species of Special Concern, and others are on a CDFW Watch List. The California Natural Diversity Data Base (CNDDB) tracks species within California for which there is conservation concern, including many that are not formally listed, and assigns them a CNDDB Rank. Although CDFW Species of Special Concern and Watch List species and species that are tracked in the CNDDB but not formally

listed are afforded no official legal status, they may receive special consideration during the CEQA environmental review process. CDFW further classifies some species as "Fully Protected" (FP), indicating that the species may not be taken or possessed except for scientific purposes, under special permit from CDFW. Additionally, CFGC Sections 3503, 3505, and 3800 prohibit the take, destruction, or possession of any bird, nest, or egg of any bird except English house sparrows and European starlings unless authorization is obtained from CDFW.

No special-status wildlife species were observed during the field survey. CNDDB records of least Bell's vireo (*Vireo bellii pusillus*, federally-listed endangered and State-listed endangered) coincide with the BSA; however, the records are from the 1920s along the Los Angeles River adjacent to the HWSG property. No riparian habitat potentially suitable for this species currently occurs along the river or in the vicinity of the BSA. This species is considered extirpated from the BSA. Additionally, an undated CNDDB record of western ridged mussel (*Gonidea angulate*; species tracked in CNDDB) from the Los Angeles River coincides with the BSA, but no suitable habitat currently exists, and it is considered extirpated from the BSA.

American peregrine falcon (*Falco peregrinus anatum*), a species de-listed from the FESA and the CESA but still Fully Protected by CDFW, is known to occur within nearby Griffith Park and has as recently as 2020 attempted to fledge young at a known nest site within the park.[13] As a result, this species could occur within the BSA as a migrating or foraging transient; however, it is not expected to nest within the BSA due to the lack of suitable nesting habitat. Additionally, mature trees within the BSA provide potentially suitable nesting habitat for Cooper's hawk (*Accipter cooperii*; CDFW Watch List species), a special-status raptor species not identified during the literature review, but one known to successfully nest throughout urban environments within the Los Angeles Basin, including in nearby Griffith Park and the Glendale-Burbank area. However, American peregrine falcon and Cooper's hawk have low potential to occur within the BSA due the presence of low-quality habitat and the activity levels in the area.

No USFWS-designated critical habitat for any federally listed wildlife species coincides with the BSA. Based on the results of the literature review and field surveys, special-status wildlife species are generally not anticipated to occur within the BSA, or have a low potential to occur within the BSA based on existing site conditions and a review of specific habitat requirements, occurrence records, and known distributions of each species.

### *Construction*

While not expected to occur, Cooper's hawk may nest in mature trees within the BSA. However, by adhering to Best Management Practice (BMP) 1, related to pre-construction surveys for nesting birds and providing a qualified biological monitor should nesting birds be present, direct impacts to special-status wildlife species would be avoided.

Indirect impacts to special-status wildlife species occurring in the surrounding BSA could occur as a result of noise, increased human presence, and vibrations resulting from construction activities. If such impacts were to occur, they would be considered significant. However, with the exception of American peregrine falcon and Cooper's hawk, special-status wildlife species are not expected to occur within the BSA because suitable habitat is not present. Because American peregrine falcon would be present on site only as a migrating or foraging transient, indirect impacts to the species during construction would be considered less than significant. Indirect

[13] Cooper, Daniel S and Courtney McCammon (Cooper and McCammon). 2020. Nesting Raptors of Griffith Park and Surround Area. August 18. 35 pp.

impacts to Cooper's hawk related to disruption of nesting activity would be avoided by adhering to BMP-1.

Non-special-status bird species protected by the MBTA and CFGC also have the potential to nest in the BSA, although nesting within the construction footprints of the three proposed project components is not anticipated due to a lack of any vegetation. However, nesting may occur within native and non-native trees and shrubs located along the perimeter of the HWSG property. By avoiding vegetation removal during the nesting bird season (generally February 15 through August 31), or by implementing BMP-1 related to pre-construction surveys for nesting birds and providing a qualified biological monitor should nesting birds be present, direct impacts to nesting birds and associated nesting habitat would be less than significant.

Indirect impacts to non-special-status nesting birds within the BSA could occur as a result of noise, increased human presence, and vibrations resulting from construction activities. Disturbances related to construction could result in increased nestling mortality due to nest abandonment or decreased feeding frequency. However, with implementation of BMP-1, indirect impacts to nesting birds would be less than significant.

Although no special-status bat species are expected to occur within the BSA, large trees in the BSA may provide suitable roosting habitat for individual or small groups of bats within the vicinity of the project site. Mature trees potentially suitable for short-term day or night-time roosting, such as palm trees, may be removed. Therefore, by adhering to mitigation measure BIO-1, related to pre-construction roosting bat surveys, direct impacts to special-status bat species would be avoided. Potentially suitable colonial roosting sites do not occur within the BSA, as caves are absent and large suitable structures are limited in the project vicinity. As a result, direct impacts to colonial bat roosting habitat and day or night-roosting habitat would not occur during project construction.

Indirect impacts to bats roosting within the vicinity of the project could occur as a result of noise, increased human presence, and vibrations resulting from construction activities. Disturbances related to construction could result in displacement from daytime roosts and temporary avoidance of the project area; however, suitable trees for bat roosting are present beyond the BSA in the project vicinity. Disruption of night-time roosts is not anticipated as construction will not occur during dusk or evening hours. Therefore, indirect impacts to bats would be less than significant.

*BMP-1: Nesting Bird Surveys:* Construction should, if possible, occur outside of the nesting bird season (generally February 15 through September 15, and as early as January for raptors). If construction outside this time period is not feasible, the following measures should be employed to avoid and minimize impacts to nesting birds protected under the MBTA and CFGC:

1. A pre-construction nesting bird survey should be conducted by a qualified biologist within 3 days (72 hours) prior to the start of project construction to determine whether active nests are present within or directly adjacent to the construction zones. Following completion of the survey, a memo report should be prepared to document the location of all nests found (if any), their status (i.e., eggs or hatchlings present), existing biological conditions of the project area, and the bird species detected during the survey. If an active nest is found, recommendations to avoid and minimize impacts to the nest, such as those presented below, should be included as appropriate.

2. A no-work (or reduced work) buffer shall be established around any active passerine bird nest or raptor nest. The qualified biologist should monitor the nest on a weekly

basis, and project activities within 300 feet of an active nest of any passerine bird or within 500 feet of an active nest of any raptor shall be evaluated for potential impacts to the active nest. Monitoring should occur until the nest is no longer active. The buffers may be adjusted (including increases or reductions to the buffer) by the qualified biologist on a case-by-case basis taking into consideration the location, type, duration and timing, and severity of work, distance of nest from construction activities, surrounding vegetation and line-of-sight between the nest and work areas, and the species' site-specific level of habituation to the disturbance. If the qualified biologist determines nesting activities may fail as a result of project activities, the biologist should immediately inform the resident engineer and construction supervisor, and all project activities shall cease within the recommended no-disturbance buffer until the biologist determines the adults and young are no longer reliant on the nest site.

3. Avoidance buffers around active nests should be delineated on site with bright flagging or other means, for easy identification by construction personnel. The resident engineer and construction supervisor will be notified of the nest and the buffer limits to ensure it is maintained.

***Mitigation Measure***

**BIO-1** *Roosting Bat Surveys:* No less than 60 days prior to initiating project activities, a qualified bat biologist shall conduct a bat roosting habitat suitability assessment of any vegetation that may be removed, altered, or indirectly impacted by the project activities. Any locations identified as having potentially suitable bat roosting habitat by the qualified bat biologist shall be subject to additional nighttime surveys (bat surveys) during the summer months (i.e., June-August) to determine the numbers and bat species using the roost(s). The information collected during these additional bat surveys shall be used by the qualified bat biologist to develop species-specific measures to minimize impacts to roosting bats should bats be detected using the site. The bat surveys shall be conducted by the qualified bat biologist using an appropriate combination of visual inspection, sampling, exit counts, and acoustic surveys.

If the presence of bats within the project site is confirmed, avoidance and minimization measures, including the designation of buffers based upon the particular bat species found and phased removal of trees, shall be developed and implemented.

***Operation***

Impacts to any special-status wildlife species are not anticipated during operation of the proposed project. Removal of trees or vegetation that could affect special-status wildlife species would not occur during project operation.

**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 Wildlife or U.S. Fish and Wildlife Service?**

**Less Than Significant Impact.** The Los Angeles River is located along the northern limits of the BSA. This section of the river consists of a concrete box channel, about 130 feet wide with up to 20-foot sidewalls. There is no riparian vegetation in or along this reach of the river. Six special-status vegetation communities have been reported in the CNDDB within the six quad search area (an area of approximately 360 square miles). Of these six vegetation communities, one sensitive native vegetation community, arroyo willow, occurs within the BSA. Along with black willow, arroyo willow are common riparian species in southern California. Within the HWSG property, these species occur along a linear swale-like feature south of the West Reservoir. This area is outside the proposed project development footprint.

### Construction

Construction of the proposed project would occur within bare ground and areas that have been previously disturbed and would avoid stands of remnant native riparian vegetation within the HWSG property. Therefore, direct impacts to sensitive natural communities would not generally occur. Indirect impacts to native riparian vegetation communities occurring in the BSA could include the accumulation of fugitive dust, and the colonization of non-native, invasive plant species. Other indirect impacts could include an increase in the amount of compacted or modified surfaces that, if not controlled, could increase the potential for surface runoff, increased erosion, and sediment deposition within the remnant native riparian communities. As discussed in Section 3.3(b) above, the proposed project would be required to comply with SCAQMD Rule 403, which requires measures to prevent the generation of visible dust plumes such as applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system, and maintaining effective cover over exposed areas. Additionally, as further discussed in Section 3.7(b), a SWPPP, including the development and implementation of a site-specific erosion and sedimentation control plan, would be prepared for the project. This would include measures for general site management, construction materials and waste management, and erosion and sediment controls for wet and dry seasons. Implementation of the SWPPP would help to minimize erosion and runoff from the site during construction. With adherence to construction requirements related to the control of fugitive dust and implementation of the SWPPP, the potential for indirect impacts to vegetation in the surrounding BSA would be less than significant.

### Operation

No operational activities would occur within riparian habitat areas in the HWSG. As such, no direct impacts to these resources would occur during project operation. Following construction, the project site would have more impervious surfaces than under existing conditions. However, the project would comply with the City's LID ordinance to reduce the volume and intensity of stormwater flows such that the erosion created by runoff from impervious surfaces would be controlled. Additionally, stormwater would be captured and utilized to the extent possible to provide water for plants, minimizing the amount of stormwater runoff from the site that could lead to erosion. Therefore, indirect impacts to sensitive riparian habitat would be less than significant during operation.

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

**Less Than Significant Impact.** Based on a review of the US Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI), several features were originally mapped by NWI within the BSA, including freshwater ponds, freshwater emergent wetland, and riverine habitat (the Los Angeles River channel); all were classified as being man-made and having temporary or seasonally flooded water regimes. These aquatic features are no longer evident within the HWSG property. One remaining potentially jurisdictional feature, a swale-like feature located south of the West Reservoir, along the southern boundary of the HWSG property, is not mapped in the NWI. This feature does not coincide with the footprint of any of the project components. Additionally, no construction activities would occur within the Los Angeles River channel.

As discussed in detail in Section 3.10(a), during project operation, an average of approximately 1.38 MGD of tertiary treated wastewater would be diverted from the LAGWRP to the proposed DPR Demonstration Facility, where it would undergo advanced treatment. It has been assumed that the entire 1.38 MGD provided by LAGWRP to the DPR Demonstration Facility would represent a diversion of recycled water that would otherwise be discharged to the Los Angeles River adjacent to LAGWRP. After undergoing advanced treatment, approximately 1.17 MGD of treated effluent from the DPR Demonstration Facility would be discharged to the Los Angeles River adjacent to the HWSG property, while the remaining approximately 0.21 MGD of water processed through the facility would be returned to LAGWRP for treatment. The process losses during tertiary treatment of this returned water at LAGWRP would be approximately 18 percent by volume (approximately 0.04 MG) of sludge byproduct, which would be conveyed in the existing sewer system to Hyperion Water Reclamation Plant in El Segundo. The remaining recycled water (approximately 0.17 MG) would be available for discharge to the Los Angeles River. This entire process would result in a reduction in discharge of 0.04 MGD to the Los Angeles River downstream of LAGWRP, representing a decrease in flow of approximately 0.06 cubic feet per second, resulting in a reduction in depth of approximately 0.1 millimeter or less, depending on the location in the river. This would represent an essentially immeasurable change and is therefore, considered de minimis. Therefore, operation of the proposed project would not have a substantial adverse effect on the Los Angeles River channel. The impact would be less than significant.

**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?**

**Less Than Significant Impact.** Habitat fragments are isolated patches of habitat separated by otherwise foreign or inhospitable areas, such as urban/suburban tracts, agricultural lands, or highways. Habitat fragments can isolate species populations by limiting migration, foraging, and breeding opportunities. Isolation of populations can have many harmful impacts and may contribute significantly to local species extinction. In an urban context, a wildlife migration corridor can be defined as a linear landscape feature of sufficient width and buffer to allow animal movement between two comparatively undisturbed habitat fragments, or between a habitat fragment and some vital resource that encourages population growth and diversity.

Mature trees and shrubs along Forest Lawn Drive in the southern portion of the HWSG property and in the memorial parks on the other side of Forest Lawn Drive may provide a corridor for localized bird movement between natural open space areas in nearby Griffith Park and the surrounding urban environment. However, the BSA does not occur within or intersect a

recognized/established regional wildlife corridor.

The Los Angeles River is located along the northern limits of the HWSG. This section of the river consists of a concrete box channel, about 130 feet wide with up to 20-foot high sidewalls. There is no riparian vegetation in or along this reach of the river; however, storm flows and urban sources promote the production of algae within sheet flow in the channel that support some bird species that feed on the algae and associated invertebrates. Although the river channel provides a food source for bird species and potentially other wildlife, and may provide opportunities for localized wildlife movement, it does not connect significant open or green-space areas or natural habitats that may provide critical wildlife resources (i.e., food, cover, water) and does not serve as a significant wildlife movement corridor.

**Construction**

The BSA does not generally serve as a regional wildlife corridor, and as a result, direct impacts to a regional wildlife movement corridor would not occur. However, as discussed, the Los Angeles River channel occurs within the BSA and could provide opportunities for local wildlife movement. Since no work would occur in the channel, project construction activities are not anticipated to directly impact the channel's potential to facilitate wildlife movement.

As previously discussed, indirect impacts to nesting birds could occur as a result of noise, increased human presence, and vibration from construction activities. Disturbances related to construction could result in increased nestling mortality due to nest abandonment or decreased feeding frequency. Such indirect effects would be temporary in nature, restricted to the project construction duration. By implementing and adhering to BMP-1 listed in Section 3.4(a) related to pre-construction surveys and providing qualified biological monitors as necessary, indirect impacts to localized bird movement and nesting are not anticipated, and impacts would be less than significant during construction.

**Operation**

As discussed in Section 3.4(c) above, operation of the proposed DPR Demonstration Facility would result in a *de minimis* change in flows to the Los Angeles River below LAGWRP, which is located approximately 3.5 miles downriver of HWGS. The discharge of approximately 1.17 MGD from the DPR Demonstration Facility to the river would actually increase in flow in the river between the HWSG property and LAGWRP. As such, operation of the proposed project would not interfere with the river's potential to provide opportunities for local wildlife movement. The impact would be less than significant during project operation.

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

**Less Than Significant Impact.** Native tree species protected under the City's Native Tree Protection Ordinance (Ordinance No. 177404) include oak trees indigenous to California but excluding scrub oak (*Q. dumosa*); southern California black walnut (*Juglans californica*); western sycamore; and California bay (*Umbellularia californica*) (Section 17.02 of City of Los Angeles Municipal Code). In December 2020, the City added two native shrub species, blue elderberry and toyon. Pursuant to the ordinance, native trees that were planted or grown as part of a tree planting program are not "Protected Trees." Trees and shrubs must be four inches or greater in diameter at 4.5 feet above ground to be considered protected. The City's Board of Public Works must issue a permit before any alterations to protected trees are made that could cause them to be damaged,

relocated, or removed. Pruning also requires a permit and must comply with the pruning standards set forth by the Western Chapter of the International Society of Arboriculture in a manner that does not cause permanent damage or adversely affect the health of the trees. Per the ordinance, the tree removal permit may require replanting of native trees within the vicinity if possible or, if not, at another location within the City to mitigate for the removal of trees. The ordinance requires the size and number of replacement trees to approximate the value of the tree or shrub removed.

Trees have reestablished along the southern perimeter of the HWSG property after the spreading grounds function at the property was discontinued in the early 1980s. These trees are a mix of native and non-native species and do not constitute an intact natural community. Nonetheless, a permit may be required for the removal or pruning of any of the protected tree species. Coast live oak, western sycamore, toyon, and blue elderberry were identified within these stands along the southern perimeter. A limited number of these trees and shrubs may be impacted at the proposed primary entry to the project site at Mt. Sinai Drive and Forest Lawn Drive and south of the proposed DPR Demonstration Facility. Impacts to any ordinance-protected species would be determined during final design. A Tree Removal Permit in compliance with the City's Native Tree Protection Ordinance would be required for the removal of any protected tree. With issuance of a tree removal permit from Public Works and implementation of compensation to mitigate for tree removals pursuant to the permit requirements, the project would be in compliance with the Native Tree Protection Ordinance, and direct impacts to ordinance-protected species would be less than significant.

The City of Los Angeles Department of Public Works also manages removal, replacement, and maintenance of the City's street trees and landscaped median islands. "Street trees" are those occurring in the public right-of-way, and a permit from Public Works Urban Forestry Division is required to remove a street tree. Under Los Angeles Municipal Code Section 62.170, as a condition to the permit, the permittee may be required to plant another tree of the type and size specified in the permit. However, in accordance with Los Angeles Municipal Code Section 62.177, a payment of in-lieu fees for the purchase, installation, and maintenance of trees is allowable when the required replacement trees cannot feasibly be planted on site.

In the event it is determined that street trees would require removal to accommodate construction of the proposed primary entrance point to the project site, LADWP would obtain a street tree removal permit from the City of Los Angeles Department of Public Works, and the appropriate compensation to mitigate any street tree removals would be completed in compliance with the City's street tree policy. With adherence to existing regulations and permitting requirements, the proposed project would not conflict with any local policies or ordinances protecting biological resources. The impact would be less than significant.

**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.** No adopted Habitat Conservation or Natural Community Conservation Plans coincide with the boundaries of the HWSG property.[14] Therefore, no impact would occur.

[14] California Department of Fish and Wildlife. Natural Community Conservation Plans, Map. Available at: https://wildlife.ca.gov/Conservation/Planning/NCCP/Plans. Accessed January 19, 2024.

## 3.5 Cultural Resources

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| *Would the project:* | | | | |
| a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5? | ☐ | ☐ | ☐ | ☒ |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5? | ☐ | ☐ | ☒ | ☐ |
| c) Disturb any human remains, including those interred outside of dedicated cemeteries? | ☐ | ☐ | ☒ | ☐ |

### Discussion

Potential impacts related to cultural resources resulting from implementation of the proposed project were determined from the results presented in the Cultural Resources Technical Memorandum prepared for the proposed project, which is included as Appendix C to this IS/MND.

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

**No Impact.** CEQA Section 15064.5 states that historical resources are “any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource.” In addition, “a resource is "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources and is:

A. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

B. Is associated with the lives of persons important in our past;

C. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

D. Has yielded, or may be likely to yield, information important in prehistory or history.

A cultural resource determined to meet one or more of the above criteria is considered a historical resource under CEQA. Historical resources eligible for listing in the California Register of Historical Resources (CRHR) must retain enough of their historic character or appearance to be able to convey the reasons for their significance. Such integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association.

Archival research conducted for the proposed project included a review of South Central Coastal Information Center records search, archival research, literature, historical map, and aerial photograph review, and archaeological site sensitivity analysis. The records search included the Area of Potential Effects (APE), which is identified as the boundary of the 43-acre Headworks property. In addition, the records search included a half-mile radius around the APE. As part of the records search, the following federal and California inventories were reviewed: National Register of Historic Places (NRHP), California Inventory of Historic Resources, California Points

of Historical Interest. California Historical Landmarks, Archaeological Determinations of Eligibility and Los Angeles County Archaeological Resources Directory, Built Environmental Resources Directory for Los Angeles County, and City of Los Angeles Historic-Cultural Monuments (LAHCM).

Archival records search revealed that 15 studies have taken place within the 0.5-mile records search radius. Of the 15 previous studies, seven have previously surveyed the APE, resulting in previous survey coverage of 100 percent of the APE. The records search revealed two resources located within the APE and two resources within the 0.5-mile records search radius. All four resources are historic-period resources, and are summarized in Table 3-3 below.

**Table 3-3: Previously Recorded Cultural Resources within 0.5 Mile of the APE**

| Primary Number (P-19-) | Trinomial (CA-LAN) | Description | Evaluation | Distance from APE |
|---|---|---|---|---|
| 004712 | 4712H | Headworks Spreading Grounds | Not eligible for listing in NRHP | Within |
| 150414 | 0022H | Adobe house, Ranch House of Rancho Cahuenga | Unevaluated | 0.3 miles north |
| 150415 | 0023H | House structure, “Old House of Lopez” | Unevaluated | Precise location unknown (not within APE) |
| 175297 | None | Griffith Park | Individually determined eligible for NRHP by consensus through Section 106 process<br>Listed in the CRHR<br>LAHCM | Within |

As shown in Table 3-3 above, only one resource, P-19-175297 (Griffith Park), is listed in the CRHR, and is a historical resource as defined by CEQA Section 15064.5(a). Resource P-19-004712 (Headworks Spreading Grounds) was determined ineligible for the NRHP and CRHR in 2020 and is not a historical resource as defined by CEQA Section 15064.5(a). Resources P-19-150414 (Adobe house) and P-19-150415 (House structure) are not located within the APE.

The boundaries of P-19-175297 (Griffith Park) overlap the APE; however, historically the area within the APE did not function as part of the park. The APE has a separate history associated with water acquisition as opposed to recreation. At some point over the park’s history, the area within the APE was incorporated into the park’s boundaries. However, none of the park’s defining historic features are located within or adjacent to the APE. The closest character-defining feature, Travel Town, is 0.14 miles east of the APE and separated by a sixty-foot-wide roadway and two high fences. The APE is located along the northernmost boundary of the park property and is not visible from any of the park’s character-defining features. The proposed project would not constitute a substantial adverse change because the park would not be materially altered in an adverse manner, and the physical characteristics that convey its historical significance and justify its eligibility for inclusion in the NRHP, CRHR, and LAHCM will remain intact and unchanged (CEQA Section 15064.5[b][2][A-C]). There would be no impact to the historical resource.

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

**Less Than Significant Impact.** The entire APE has been surveyed on multiple occasions, most recently in 2020 when it was subject to an intensive pedestrian survey. The project site is located on the banks of the Los Angeles River and beside the hills that are now a part of Griffith Park. Map research shows no buildings within the APE prior to the channelization of the Los Angeles River. Moreover, the area also has a history of intensive disturbance. The APE is located on a natural low-lying area beside the Los Angeles River, and flooding likely washed away archaeological remains that may have existed at the site prior to the river's channelization. Wells and pipes up to 150 feet deep have been dug at the site since the first quarter of the 20th century. The massive earthmoving associated with the channelization of the Los Angeles River and the construction of the spreading grounds in 1938, and the spreading grounds' reorganization between 1954 and 1964, disturbed the APE to significant depths and would most likely have destroyed any cultural resources located within the APE. Additionally, recent earthmoving construction associated with the Headworks East and West Reservoirs has eradicated most features associated with the original Headworks Spreading Grounds. No archaeological resources were encountered in the APE during three archaeological surveys conducted at HWSG or during the construction of the reservoirs. Based on the results of the archival research and past surveys, there is low potential that unknown archaeological resources will be encountered during ground-disturbing activities.

Although not expected to occur due to the low potential in the APE, there could be an inadvertent discovery of previously unrecorded archaeological resources during project construction activities. Therefore, BMP-2 regarding cultural resources awareness training, as outlined below, would be employed during construction of the proposed project.

**BMP-2** All field supervisors and construction workers shall participate in cultural resources awareness training prior to the initiation of project construction activities that involve ground-disturbance. The training shall include a description of the types of cultural resources (including tribal cultural resources and human remains) that could inadvertently be encountered during ground-disturbing activities, the sensitivity of the resources, the legal basis for protection of the resources, and the penalties for unauthorized collection of or knowingly damaging the resources. The training shall address the proper procedures in the event of an inadvertent discovery of a cultural resource, including the immediate halting of work in the area of the discovery, notification of appropriate individuals of the discovery, the establishment of appropriate protective buffer zones around the discovery, and the continued avoidance of the protected area until the resource has been evaluated by qualified individuals and an appropriate treatment plan has been developed and implemented. These procedures shall be documented in a cultural resources monitoring plan (CRMP) that shall establish, in the event of an inadvertent discovery of cultural resources, monitoring procedures (including applicable archaeological and/or tribal monitors), notification procedures, key staff, and preliminary treatment measures for potential discoveries. The CRMP shall be written to ensure compliance with appropriate state and federal laws. The training presentation and CRMP shall be available to additional supervisory or construction personnel who may join after project construction has begun.

If archaeological material is uncovered in the course of ground-disturbing activities, in accordance with California PRC Section 21083.2(i) regarding provisions related to the accidental discovery of archaeological resources, work shall be temporarily halted in the vicinity of the find, and LADWP shall retain a qualified professional archaeologist meeting the Secretary of the Interior's Standards for archaeology to evaluate the significance of the find and determine appropriate treatment for the resource in accordance with provisions of CEQA Guidelines Section 15064.5, the National Historic Preservation Act, 36 CFR (Code of Federal Regulations) Section 800.6 (Resolution of adverse effects), and Section 800.13 (Post-review discoveries). Construction activities may continue on other parts of the construction site while the evaluation and treatment of archaeological resources take place. With implementation of BMP-2 and compliance with existing regulations, impacts related to archaeological resources would be less than significant.

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

**Less Than Significant Impact.** While the project site is located adjacent to two cemeteries, Forest Lawn Memorial Park and Mount Sinai Memorial Park, there are no cemeteries or known burial grounds located within the HWSG property. Based on the results of the archival research, there is low potential for such sites to be encountered during ground-disturbing activities. Moreover, historical construction activities have disturbed the entire APE. The likelihood of encountering undisturbed soils that may contain human remains is considered highly unlikely.

While not expected to occur, in the event that human remains are discovered, the remains would be treated in accordance with all applicable regulations. In accordance with the provisions of the California Health and Safety Code Section 7050.5, in the event that human remains are discovered during project construction, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains would occur, and the Los Angeles County Coroner would be notified. The coroner will provide recommendations concerning the treatment and disposition of the human remains within two working days. If the remains and/or related resources, such as funerary objects, are determined to be of Native American origin, the coroner would contact the California Native American Heritage Commission (NAHC) within 24 hours. In accordance with California PRC Section 5097.98, the NAHC would notify the person it believes to be most likely descended from the deceased Native American. The most likely descendent would be given access to the site where the remains were discovered and may make recommendations for the treatment and disposition of the remains and related resources, as well as provide input regarding the potential for other remains to be present. Work at the discovery site may commence only after consultation with the most likely descendent and treatment of the remains and any associated resources have been concluded. Work may continue on other parts of the project site while consultation and treatment are conducted. With adherence to existing regulations, impacts related to human remains would be less than significant.

## 3.6 Energy

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| *Would the project:* | | | | |
| a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | ☐ | ☐ | ☒ | ☐ |
| b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? | ☐ | ☐ | ☒ | ☐ |

### Discussion

Potential impacts related to energy use resulting from implementation of the proposed project were determined from the results presented in the Energy Impact Study prepared for the proposed project, which is included as Appendix D to this IS/MND.

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

**Less Than Significant Impact.** The following analysis discusses short-term construction and long-term operational use of electricity, natural gas, and petroleum.

### Construction

#### *Electricity*

Construction of the proposed project would require electricity for construction trailers and the operation of electrically powered tools and equipment. Electricity to the site would be provided by LADWP, and it is anticipated that the source of electricity would be a connection to the existing grid. Consumption of electricity for construction would be relatively minimal and would cease after completion of the proposed project. Therefore, construction of the proposed project would result in a less than significant impact related to wasteful, inefficient, or unnecessary consumption of electricity.

#### *Natural Gas*

Construction activities typically do not require the consumption of natural gas to power equipment or heavy machinery. Natural gas that would be consumed during construction would be negligible and would not result in a significant drain on natural gas resources. Therefore, construction of the proposed project would result in a less than significant impact related to wasteful, inefficient, or unnecessary consumption of natural gas.

#### *Petroleum*

Petroleum would be consumed during construction activities of the proposed project by heavy-duty equipment, which is usually diesel powered. Construction of the proposed project would also result in an increased consumption of gasoline and diesel fuels associated with haul trucks, deliveries, and worker commute trips. The proposed project would require approximately

355,380 gallons of diesel fuel and 110,616 gallons of gasoline over the seven-year construction period. The annual average petroleum fuels consumption would be approximately 50,769 gallons of diesel fuel and 15,802 gallons of gasoline per year during construction of the proposed project. For context, in 2021, California consumed approximately 605 million barrels of oil.[15] There are 42 U.S. gallons in a barrel, so California consumes approximately 25 billion gallons of petroleum annually. The proposed project would use best practices to eliminate the potential for the wasteful consumption of petroleum. Exported materials (e.g., demolition debris and soil hauling) would be disposed of at the closest facility that accepts such materials, and the proposed project would be required to comply with CARB's Airborne Toxics Control Measure, which restricts heavy-duty diesel vehicle idling time to five minutes. Therefore, because petroleum use would be minimized to the extent feasible and represents a comparatively small amount of fuel consumption, construction of the proposed project would result in a less than significant impact related to wasteful, inefficient, or unnecessary consumption of petroleum.

**Operation**

***Electricity***

Operation of the proposed project would require electricity for all three project components. As previously stated, minimal site lighting would be provided at the proposed Headworks Restoration Park because use of the park would be limited to dawn to dusk. Electricity would be required for indoor and outdoor lighting and other functions at the WQL and DPR Demonstration Facility. Excluding the electricity required for the micro-filtration and reverse osmosis processes during water treatment at the DPR Demonstration Facility (see below), the proposed project is estimated to consume 2,220 megawatt-hours of electricity per year. However, the WQL would be designed to meet the Mayor's Resilience by Design Directive by seeking to obtain LEED Gold certification, with the objective of achieving LEED Platinum certification and Envision Sustainable Infrastructure certification. This would represent a substantial energy savings over the operation of the existing Pasadena WQL, which is housed in a building constructed in the 1960s.

In addition, the DPR Demonstration Facility would help prove technologies that may eventually allow for the reuse of locally generated wastewater, thus limiting the use of imported water, which consumes the majority of the energy used by the water sector in the state.

***Natural Gas***

The proposed project would not consume natural gas consumption. Space and water heating at the WQL and DPR Demonstration Facility would be achieved with solar panels and heat pump units that operate on electricity. Therefore, operation of the proposed project would not result in a significant impact related to wasteful, inefficient, or unnecessary consumption of natural gas.

***Petroleum***

Petroleum consumption during operation of the proposed project would be related to vehicle trips for employees and visitors. The assessment of transportation fuels is based on the VMT analysis completed for the proposed project. As detailed in Section 3.17(b), the net VMT for the proposed project is estimated to be 6.11 miles per employee. This VMT would be less than the average per

[15] U.S. Energy Information Administration. California State Profile and Energy Estimates – Table F16: Total Petroleum Consumption Estimates, 2021.Available at: https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_use_pa.html&sid=US&sid=CA. Accessed January 2024.

employee for the Central Area Planning Commission factor. There are no unusual project characteristics or processes that would require intensive petroleum consumption, or use of equipment that would not conform to current emissions standards and related fuel efficiencies. Implementation of the proposed project would not require the development of additional petroleum fuels infrastructure or supply. Therefore, operation of the proposed project would not result in a significant impact related to wasteful, inefficient, or unnecessary consumption of petroleum.

**b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

**Less Than Significant Impact.** The proposed project would not obstruct a State or local plan for renewable energy or energy efficiency. The WQL would be designed to meet the Mayor ‘s Resilience by Design Directive by seeking to obtain LEED Gold certification, with the objective of achieving LEED Platinum certification and Envision Sustainable Infrastructure certification. The conceptual design for the WQL incorporates best management practices and high-performance strategies in several of the major LA Green New Deal target areas. The WQL would have a photovoltaic array on the rooftop and would also include an internal landscaped courtyard, and may include a green roof, to reduce heat and conserve water through stormwater capture and treatment. Recycled water from LAGWRP would provide irrigation water for landscaping, which would be drought-tolerant in the types and use of plant material. The WQL building would achieve energy efficiency by implementing strategies including building orientation, high-performance building envelope, and effective daylighting complemented by high performance lighting and high efficiency HVAC systems. The proposed project would also include EV charging stations in compliance with LADBS EVCS requirements. It would incorporate recycled material in the building construction to promote a sustainable supply chain. All lighting and lighting controls would comply with the latest version of the Building Energy Efficiency Standard (Title 24) and the California Green Building Standard Code. The Headworks Restoration Park would incorporate landscaping reflective of native plant communities and use recycled water for irrigation.

In addition, as discussed above, the DPR Demonstration Facility would help prove technologies that may eventually allow for the reuse of locally generated wastewater, thus limiting the use of imported water, which consumes the majority of the energy used by the water sector in the state.

## 3.7 Geology and Soils

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| *Would the project:* | | | | |
| a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: | | | | |
| i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. | ☐ | ☐ | ☒ | ☐ |
| ii) Strong seismic ground shaking? | ☐ | ☐ | ☒ | ☐ |
| iii) Seismic-related ground failure, including liquefaction? | ☐ | ☐ | ☒ | ☐ |
| iv) Landslides? | ☐ | ☐ | ☐ | ☒ |
| b) Result in substantial soil erosion or the loss of topsoil? | ☐ | ☐ | ☒ | ☐ |
| 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? | ☐ | ☐ | ☒ | ☐ |
| d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property? | ☐ | ☐ | ☒ | ☐ |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? | ☐ | ☐ | ☐ | ☒ |
| f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | ☐ | ☐ | ☒ | ☐ |

### Discussion

**a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**

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

**Less Than Significant Impact.** There are several earthquake faults in the project vicinity, but the project site is not located within an Alquist-Priolo Earthquake Fault Zone or other known fault

zone.[16,17] The proposed WQL, DPR Demonstration Facility, and structures associated with Headworks Restoration Park would be designed and constructed in compliance with the latest version of the Los Angeles Building Code and other applicable federal, state, and local codes to minimize impacts related to fault rupture. With adherence to existing regulations, impacts related to directly or indirectly causing potential adverse effects from the rupture of a known earthquake fault would be less than significant.

### ii. Strong seismic ground shaking?

**Less Than Significant Impact.** The project site is located within a seismically active region, and as with all locations in Southern California, is subject to strong seismic ground shaking. However, as discussed in Section 3.7(a)(i) above, the proposed WQL, DPR Demonstration Facility, and structures associated with Headworks Restoration Park would be designed and constructed in compliance with the latest version of the Los Angeles Building Code and other applicable federal, state, and local codes to minimize impacts related to seismic ground shaking. Additionally, as an essential facility, the proposed WQL would also be constructed in compliance with the seismic requirements and guidelines defined in the latest version of the American Society of Civil Engineers building code standards. With adherence to existing regulations, impacts related to strong seismic ground shaking would be less than significant.

### iii. Seismic-related ground failure, including liquefaction?

**Less Than Significant Impact.** The project site is located within a City designated liquefaction area.[18] A previous geotechnical report of the project site conducted by LADWP for the now complete Headworks Water Complex recorded groundwater at approximately 26 feet below ground surface, which did not pose a potential impact related to liquefaction for the reservoir construction; however, historically, groundwater at the site has been reported as shallow as 10 feet below ground surface.[19] As standard practice for all LADWP facility construction projects, an updated geotechnical investigation will be conducted and an updated report will be a prepared with detailed recommendations for seismic loads for all project components, which will be incorporated into the facility designs. Based on the recommendations established in the geotechnical report and with compliance with all applicable federal, state, and local codes related to seismic criteria, impacts related to seismic-related ground failure, including liquefaction, would be less than significant.

### iv. Landslides?

**No Impact.** The HWSG property is not identified as a potential landslide hazard area.[20] The proposed project would not increase the risk of landslides. Therefore, no impacts related to landslides would occur.

16 California Department of Conservation. CGS Seismic Hazards Program: Alquist-Priolo Fault Hazard Zones. Available at: https://gis.data.ca.gov/maps/ee92a5f9f4ee4ec5aa731d3245ed9f53/about. Accessed January 19, 2024.
17 United States Geologic Survey. Quaternary Faults Database. Interactive Map. Available at: https://doi.org/10.5066/F7S75FJM. Accessed January 19, 2024.
18 ZIMAS. Available at: http://zimas.lacity.org/. Accessed January 19, 2024.
19 LADWP. 2005. Silver Lake Reservoir Complex Storage Replacement Project Draft Environmental Impact Report.
20 ZIMAS. Available at: http://zimas.lacity.org/. Accessed January 19, 2024.

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

**Less Than Significant Impact.** The eastern half of the HWSG property is currently developed with the Headworks Water Complex, while the western portion is undeveloped and highly disturbed from previous excavation, earth work, and grading. Portions of the proposed Headworks Restoration Park would be developed atop the concrete roof of the recently constructed West Reservoir. Other portions of the park, such as parking, a pavilion building, trails, and site landscaping, located in adjacent areas, would require excavation and grading activities. Additionally, the proposed structures for the WQL and DPR Demonstration Facility would require excavation, earth moving, and grading. During construction, transport of sediments from the project component sites by stormwater runoff and winds would be prevented through adherence with existing regulations such Rule 403 dust control measures required by the SCAQMD and a SWPPP for construction activities, including a site-specific an erosion and sedimentation control plan, in compliance with the latest Los Angeles Regional Water Quality Control Board's National Pollutant Discharge Elimination System (NPDES) permit requirements for stormwater discharges. With adherence to applicable regulations and implementation of preventative measures, construction impacts associated with soil erosion or the loss of topsoil would be less than significant.

Following construction, the project site would have more impervious surfaces. However, the project would comply with the City's LID ordinance to reduce the volume and intensity stormwater flows such that the erosion created by runoff from impervious surfaces would be controlled. Additionally, stormwater would be captured and utilized to the extent possible to provide water for plants, minimizing the amount of stormwater runoff from the site that could lead to erosion. Therefore, there would be no substantial soil erosion or loss of topsoil during project operations, and the impact would be less than significant.

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

**Less Than Significant Impact.** As discussed in Sections 3.7(a)(iii) and 3.7(a)(iv), the HWSG site is not identified as a potential landslide hazard area. Therefore, impacts related to landslides would not occur.

Subsidence is the lowering of surface elevation due to changes occurring underground, such as extraction of large amounts of groundwater. When groundwater is extracted from aquifers at a rate that exceeds the rate of replenishment, overdraft occurs, which can lead to subsidence. No groundwater extraction would occur as part of the proposed project. Therefore, impacts related to subsidence would not occur.

Lateral spreading is a type of liquefaction-induced ground failure on mildly sloping ground. As discussed above, HWSG is located in a designated liquefaction area. Collapsible soils consist of unconsolidated, low-density materials that may collapse and compact under the addition of excessive water or loading. Soil collapse occurs when the land surface is saturated at depths greater than those reached by typical rain events. The HWSG site is underlain by young alluvial valley deposits (sand, silt, and gravel) and fill, which are susceptible to collapse. As discussed previously, an updated geotechnical investigation will be conducted for the proposed project. All project components would be designed and constructed based on the report recommendations and in accordance with all applicable federal, state, and local codes related to seismic criteria. Therefore, impacts would be less than significant.

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

**No Impact.** Expansive soils are clay-based soils that tend to expand (increase in volume) as they absorb water and shrink (lessen in volume) as water is drawn away. The geologic materials underlying the project site are composed of young alluvial deposits, fill, and loamy sand soils, which are not susceptible to expansion.[21,22]

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

**No Impact.** Wastewater from the project, which is anticipated to be relatively low in volume, would be handled through a connection to the existing sewer line that is located parallel to Forest Lawn Drive at the east end of HWSG and that is routed to LAGWRP. No septic tanks or alternative wastewater disposal systems are proposed as part of the project. Therefore, no impact associated with the use of such systems would occur.

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

**Less Than Significant Impact.** The existing HWSG site has previously been disturbed by a long history of excavation, earth moving, and grading for various water extraction, storage, and distribution facilities. Based on previous disturbance and analysis at HWSG, the excavation and removal of fill and alluvial materials at the site would not be likely to alter any unique or significant geologic features. Therefore, the proposed project would not be anticipated to directly or indirectly destroy a unique paleontological resource or site or unique geological feature. In addition, although not expected to occur, in the event previously uncovered paleontological resources are encountered during project construction, the provisions of CEQA Guidelines Section 15064.5(f) would be followed. Accordingly, the construction manager would halt construction activities in the immediate area. LADWP would retain a qualified paleontologist to make an evaluation of the significance and appropriate treatment of the resource. Construction activities may continue on other parts of the construction site while evaluation and treatment of paleontological resources take place, if necessary. Compliance with these existing policies would ensure that the impact to paleontological resources would be less than significant.

[21] California Department of Conservation. Compilation of Quaternary Surficial Deposits Map. Available at: https://maps.conservation.ca.gov/cgs/QSD/. Accessed January 19, 2024.

[22] United States Department of Agriculture. Natural Resources Conservation Service. Web Soil Survey. Available at: https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx. Accessed January 19, 2024.

## 3.8 Greenhouse Gas Emissions

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| *Would the project:* | | | | |
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | ☐ | ☐ | ☒ | ☐ |
| b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | ☐ | ☐ | ☒ | ☐ |

### Discussion

Potential impacts related to GHG emissions associated with the proposed project were determined from the results presented in the Greenhouse Gas Emissions Impact Study prepared for the proposed project, which is included as Appendix E to this IS/MND.

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

**Less Than Significant Impact.** The proposed project would generate GHG emissions during temporary construction activities and long-term operations. Construction would result in short-term GHG emissions produced by construction equipment exhaust as well as on-road vehicle trips from personal vehicles for worker commuting, vendor deliveries of equipment and materials, and trucks for soil and debris hauling. Construction of the proposed project would generate a total of approximately 4,400 metric tons of carbon dioxide equivalents ($MTCO_2e$), which equates to approximately 147 $MTCO_2e$ annually when amortized over the life of the project, which is defined as 30 years under SCAQMD guidance. Sources of GHG emissions during project operation include automobile trips, landscaping equipment, water use, and waste generation. Annual GHG emissions would be approximately 1,399 $MTCO_2e$ during the first full year of operations, including annualize construction emissions.

Table 3-4 presents the estimated annual GHG emissions that would be generated by operation of the proposed project from area, energy, mobile, water, and waste sources, as well as the amortized construction emissions. As shown in Table 3-4, the annual GHG emissions of 1,399 $MTCO_2e$ would be below the interim SCAQMD quantitative threshold value of 3,000 $MTCO_2e$ for residential and commercial developments, including industrial parks and warehouses. Therefore, implementation of the proposed project would result in a less than significant impact related to the generation of GHG emissions.

**Table 3-4: Proposed Project Annual Greenhouse Gas Emissions**

| Emissions Source | $CO_2e$ Emissions (Metric Tons per Year) |
|---|---|
| **Construction** | |
| Construction Emissions Amortized (Direct) | 147 |
| **Operation** | |
| Area Source Emissions (Direct) | 3 |
| Energy Source Emissions (Indirect) | 832 |
| Mobile Source Emissions (Direct) | 169 |
| Waste Disposal Emissions (Indirect) | 4 |
| Water Processes Emissions (Indirect) | 244 |
| **TOTAL CONSTRUCTION AND OPERATION** | **1,399** |
| SCAQMD Draft Significance Threshold | 3,000 |
| **EXCEED THRESHOLD?** | **No** |

Source: TAHA, 2022.

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

**Less Than Significant Impact.** The proposed project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. The WQL would be designed to meet the Mayor's Resilience by Design Directive by obtaining LEED Gold certification, with the objective to achieve LEED Platinum certification and Envision Sustainable Infrastructure certification. The WQL may also include a green roof, which would be covered with vegetation to reduce heat and capture stormwater. The conceptual design for the WQL incorporates best management practices and high-performance strategies in several of the major LA Green New Deal target areas. The WQL would include a photovoltaic array on the rooftop of the building. It would also include an internal landscaped courtyard, and may include a green roof, to conserve water through stormwater capture and treatment. Recycled water from LAGWRP would provide irrigation water for the proposed project landscaping, which would be drought-tolerant in the types and use of plant material. The WQL building would achieve energy efficiency by implementing strategies including building orientation, high-performance building envelope, and effective daylighting complemented by high performance lighting and high efficiency HVAC systems. The proposed project would include EV charging stations in compliance with LADBS EVCS requirements. It would also incorporate recycled material in all aspects of the building construction to promote a sustainable supply chain. All lighting and lighting controls for the proposed project would comply with the latest version of the Building Energy Efficiency Standard (Title 24) and the California Green Building Standard Code. In addition, the DPR Demonstration Facility would help prove technologies that may eventually allow for the reuse of locally generated wastewater, thus limiting the use of imported water, which consumes the majority of the energy used by the water sector in the state.

A detailed analysis describing the extent to which the proposed project complies with or does not conflict with adopted plans and policies to reduce GHG emissions, including Executive Orders S-3-05 and B-30-15, the Assembly Bill 32 *Climate Change Scoping Plan*, and SCAG's 2020-2045 RTP/SCS, is included in Appendix E to this IS/MND and summarized below.

Executive Orders S-3-05 and B-30-15 established goals to reduce GHG emissions to 80 percent below 1990 levels by 2050. Studies have shown that in order to meet the 2050 goal, aggressive

technologies in the transportation and energy sectors, including electrification and the decarbonization of fuel, will be required. In the *First Update to the Climate Change Scoping Plan*, CARB generally described the types of activities required to achieve the 2050 target: "energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and rapid market penetration of efficiency and clean energy technologies that requires significant efforts to deploy and scale markets for the cleanest technologies immediately."[23] In 2008, CARB approved a *Climate Change Scoping Plan* as required by Assembly Bill 32. The *Climate Change Scoping Plan* and subsequent updates in 2014, 2017, and 2022 contain a range of GHG reduction actions that include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a cap-and-trade system, and an Assembly Bill 32 implementation fee to fund the program.

The proposed project would be designed and constructed to meet 2022 Title 24 standards, and the proposed WQL would be designed to meet the Mayor's Resilience by Design Directive by obtaining LEED Gold certification, with the objective to achieve LEED Platinum certification and Envision Sustainable Infrastructure certification. The project would be consistent with the *Climate Change Scoping Plan* GHG Reduction Strategies and would not conflict with initiatives to reduce emissions.

The California legislature passed Senate Bill 375 to connect regional transportation planning to land use decisions made at a local level by integrating land use planning with the goal of reducing VMT for cars and light duty trucks. Senate Bill 375 requires the metropolitan planning organizations to prepare an SCS in their regional transportation plans to achieve the regional per capita GHG reduction targets established by CARB. Under Senate Bill 375, the primary goal of the RTP/SCS is to provide a framework for future growth that will decrease per capita GHG emissions from cars and light-duty trucks. The proposed project would not have a VMT impact, as analyzed in Section 3.17(b), and is therefore consistent with the 2020-2045 RTP/SCS. Therefore, the proposed project would be consistent with and would not conflict with the applicable GHG reduction plans, policies and regulations.

[23] CARB. *First Update to the Climate Change Scoping Plan*. May 2014.

## 3.9 Hazards and Hazardous Materials

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| *Would the project:* | | | | |
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | ☐ | ☐ | ☒ | ☐ |
| b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | ☐ | ☐ | ☒ | ☐ |
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | ☐ | ☐ | ☒ | ☐ |
| d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? | ☐ | ☐ | ☐ | ☒ |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? | ☐ | ☐ | ☐ | ☒ |
| f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | ☐ | ☐ | ☐ | ☒ |
| g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? | ☐ | ☐ | ☒ | ☐ |

### Discussion

**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.** Implementation of the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Construction activities would be temporary in nature and would involve the limited transport, storage, use, and disposal of hazardous materials for the purpose of developing the proposed project facilities. Such hazardous materials could include on-site fueling of construction equipment, and the transport of fuels, lubricating fluids, and solvents. These types of materials are not acutely hazardous, and all storage, handling, and disposal of these materials are regulated by the California Department of Toxic Substances Control, United States Environmental Protection Agency, the Occupational Safety & Health Administration, the Los Angeles County Fire Department, and the Los Angeles County Health Department. The transport, use, and disposal of construction-related hazardous materials would occur in conformance with applicable federal, State, and local regulations governing such activities. Therefore, the

construction impacts would be less than significant.

Each storage room within the WQL would be designed for the specific mix of substances that can be safely stored together within that room. The proposed WQL would be designed for the safe handling of hazardous materials, and would include flammable and corrosive storage rooms, a hazardous chemical room, a gas cylinder support room, and a hazardous waste storage room. The proposed WQL would ensure staff safety through once-through (single pass) air systems in lab areas, fume hoods located away from the exits, air handling units for supply air placed away from exhaust fans/stacks, American National Standards Institute compliant combination eyewash and shower safety stations, a central safety and supplies storage room, and safety stations within each lab. Additionally, a Mobile Laboratory Trailer would have a local cage structure for cylinder gases while parked on-site. Hazardous waste would be transported in accordance with applicable federal, State, and local regulations, and disposed of at a Class I landfill.

The proposed DPR Demonstration Facility would also be designed to include a chemical storage area, which would conform with all applicable federal, State, and local regulations governing storage of hazardous materials. All project components, including the Headworks Restoration Park, would also require the minimal, limited routine transport, storage, use, or disposal of hazardous materials for activities associated with long-term operations such as landscaping, scheduled maintenance, or emergency repair.

All project components would be designed to ensure hazardous materials would be properly contained and that such substances would not spill or leak. Additionally, the WQL would continue to implement a Chemical Hygiene Plan, similar to the plan in place at the existing laboratory in Pasadena. The Chemical Hygiene Plan establishes and describes procedures, equipment, personal protective equipment, and work practices to protect personnel from the potential hazards of using chemicals in the WQL and to ensure that exposure to substances stored and used in the WQL are within the limits established in the California Code of Regulations, Title 8, Section 5191(c). The contents of the Chemical Hygiene Plan are derived in part from, and are intended to supplement, the LADWP Water Quality Division Injury and Illness Prevention Program. The proposed DPR Demonstration Facility would be required to prepare and implement a similar Chemical Hygiene Plan. The materials transported and used at the proposed WQL and DPR Demonstration Facility are typical of water quality and treatment processes used at other LADWP facilities; therefore, the storage and use of these chemicals would comply with federal, State, and local regulations, similar to their other facilities. With adherence to applicable regulations, project operation would not pose a significant hazard to the public or the environment. Therefore, the impact related to a significant hazard through the routine transport, use, and handling of hazardous materials would be less than significant.

**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.** The proposed project would not create reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. As discussed in Section 3.9(a), construction activities may involve limited transport, storage, and use of some hazardous materials, such as fuel for construction equipment. These types of materials are not acutely hazardous, and compliance with existing federal, State, and local regulations would ensure that construction impacts related to reasonably foreseeable upset accident conditions involving the release of hazardous materials would be less than significant. As discussed in Section 3.9(a), the proposed project would incorporate design elements to ensure

the safe handling and storage of the hazardous materials required to carry out the activities of the proposed project. Compliance with existing federal, State, and local regulations would ensure that operational impacts related to reasonably foreseeable upset accident conditions involving the release of hazardous materials would be less than significant.

**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.** Providence High School, located in the City of Burbank, is approximately 0.2 miles northwest of the western border of the HWSG property and approximately 0.25 miles of the proposed DPR Demonstration Facility. Construction of the proposed project would involve the handling of materials such as fuels, lubricating fluids, and solvents, which are not acutely hazardous. Furthermore, construction activities are short-term in nature. As discussed above in Section 3.9(a), the proposed project would comply with existing federal, state, and local regulations related to the transport, use, and disposal of hazardous materials during construction. Operation of the proposed project would involve the routine use of hazardous materials in the proposed WQL and DPR Demonstration Facility, as well as for landscaping and maintenance for the proposed Headworks Restoration Park and surrounding area. As described above, while operation of the proposed project would involve the use of hazardous materials, stringent design elements would ensure the safe handling and storage of such materials. Additionally, as discussed in Section 3.3(c), the proposed project would not result in a long-term source of TAC emissions and would not include operational uses that would result in acutely and chronically hazardous TACs during operation. Therefore, the potential impact associated with the emission of hazardous materials within one-quarter mile of an existing or proposed school would be less than significant.

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

**No Impact.** The project site is not included on any hazardous waste site lists including the Department of Toxic Substances Control's EnviroStor database, which includes CORTESE sites, the SWRCB's GeoTracker site, the United States Environmental Protection Agency's database of regulated facilities, or other lists compiled pursuant to Section 65962.5 of the Government Code.[24, 25, 26] As such, the proposed project would not create a significant hazard to the public or the environment, and no impact would occur.

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

**No Impact.** The nearest airport to the project site is Hollywood Burbank Airport, located 3.3 miles north of the project site. The project site is not located within an airport land use plan or within two

[24] California Department of Toxic Substances Control. EnviroStor Database, Search by Map Location. Available at: http://www.envirostor.dtsc.ca.gov/public/. Accessed January 19, 2024.

[25] California State Water Resources Control Board. GeoTracker Database, Search by Map Location. Available at: http://geotracker.waterboards.ca.gov/map/. Accessed January 19, 2024.

[26] United States Environmental Protection Agency. Envirofacts Database. Available at: https://enviro.epa.gov/. Accessed January 19, 2024.

miles of a public airport.[27] Therefore, no impact would occur.

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

**No Impact.** The City of Los Angeles Emergency Management Department coordinates evacuations in the case of emergency with LAPD and LAFD, as outlined in the City's Emergency Operations Plan.[28] The County of Los Angeles designates disaster routes within the County, including within the City. Within the proposed project area, SR-134 is a designated freeway disaster route.[29] However, local access to the HWSG property is provided via Forest Lawn Drive. Required modifications to traffic lanes on Forest Lawn Drive at Mt. Sinai Drive would provide a westbound right-turn lane and an eastbound left-turn lane, accommodated within the existing road right-of-way. During construction for the intersection modification, temporary lane closures may be required, but a traffic control plan would be required and approved by the LADOT. The traffic control plan would include measures such as signage, flag persons, and lane detour plans as necessary to minimize disruptions to traffic. Emergency access to the site and surrounding area, particularly for emergency response vehicles, would be maintained at all times. Except for these intersection modifications, all construction would occur within the HWSG site. No impacts to SR-134, the designated freeway disaster route, would occur.

Operation of the proposed project would not alter the adjacent street system such that the City's adopted emergency response plan or emergency evacuation plan would be impacted. Secondary access for employee, service, and maintenance vehicles would be provided from Forest Lawn Drive at the west end of the HWSG. A series of interior roads would provide access for the public, employees, maintenance, and emergency vehicles to various locations within the site as appropriate. Therefore, operation of the proposed project would not interfere with implementation of an adopted emergency response plan or emergency evacuation plan. No impact would occur.

**g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?**

**Less Than Significant Impact.** The far eastern portion of HWSG, which includes the eastern portion of the existing Headworks East Reservoir, is located within a designated Very High Fire Hazard Severity Zone (VHFHSZ).[30] The components of the proposed project (WQL, DPR Demonstration Facility, and Headworks Restoration Park) would not be constructed within the VHFHSZ. Under the proposed project, this area would remain similar to existing conditions with no additional structures. In this portion of the property, low-growing scrub vegetation has reestablished, and the top of the East Reservoir itself has been covered with soil and planted with low-growing scrub vegetation. In other areas of the HWSG property, construction activities would require the use of construction equipment or flammable materials. LADWP would comply with the provisions of the Municipal Code regarding fire protection and prevention.

In addition, the surrounding urban uses, including Forest Lawn Memorial Park and Mount Sinai

27 AirNav, LLC. Airports Search by Location. Available at: http://www.airnav.com/airports/get. Accessed January 19, 2024.

28 City of Los Angeles, Emergency Management Department. 202218. City of Los Angeles Emergency Operations Plan. Available at: https://emergency.lacity.org/emergency-plans-and-annexes. Accessed January 19, 2024.

29 Los Angeles County Department of Public Works. Disaster Route Maps: City of Los Angeles Central Area. Available at: http://dpw.lacounty.gov/dsg/disasterRoutes/map/Los%20Angeles%20Central%20Area.pdf. Accessed January 19. 2024.

30 California Department of Forestry and Fire Protection (CAL FIRE). FHSZ Viewer. Available at: https://egis.fire.ca.gov/FHSZ/. Accessed January 19, 2024.

Memorial Park to the south and the Los Angeles River and SR-134to the north, limits the risk of spread of wildfire. Therefore, the proposed project would not expose people or structures to significant risk involving wildland fires, and impacts would be less than significant.

## 3.10 Hydrology and Water Quality

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| *Would the project:* | | | | |
| a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? | ☐ | ☐ | ☒ | ☐ |
| b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? | ☐ | ☐ | ☐ | ☒ |
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: | | | | |
| i) result in substantial erosion or siltation on- or off-site? | ☐ | ☐ | ☒ | ☐ |
| ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? | ☐ | ☐ | ☒ | ☐ |
| iii) 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? | ☐ | ☐ | ☒ | ☐ |
| iv) impede or redirect flood flows? | ☐ | ☐ | ☐ | ☒ |
| d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? | ☐ | ☐ | ☐ | ☒ |
| e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? | ☐ | ☐ | ☒ | ☐ |

### Discussion

**a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?**

**Less Significant Impact.**

**Construction**

Construction activities would require excavation and grading, which would expose soils to potential erosion and runoff. However, the proposed project would be required to adhere to local, state, and federal storm water quality compliance standards, which would include compliance with storm water permits, as listed in Section 1.8 above, and other relevant standards and regulations, including the development and implementation of an erosion control plan and SWPPP to control runoff from the project site during construction. Therefore, adherence to local, state, and federal storm water quality compliance standards would ensure that impacts related to water quality standards or waste discharge requirements during construction would be less than significant.

### Operation

Similar to existing conditions, excess storm flows from the project site would be diverted to the Los Angeles River via storm drain inlets located in the eastern end of the HWSG property. As previously discussed, the project would comply with the City's LID ordinance to capture and reduce the volume of stormwater flows. Sanitary wastewater from the project components is anticipated to be relatively low in volume and would be conveyed through a connection to the existing sewer line located parallel to Forest Lawn Drive at the eastern end of the HWSG property and routed to LAGWRP. As such, surface flows and sanitary wastewater from the project site are not anticipated to violate water quality standards or waste discharge requirements.

The proposed DPR Demonstration Facility would also include the discharge of purified recycled water from the AWPF to the Los Angeles River. As discussed in Section 1.7.2 of this IS/MND, LAGWRP would be the source of recycled water that would serve as influent for the proposed DPR Demonstration Facility AWPF. All wastewater received at LAGWRP is treated to a tertiary level. LAGWRP has a treatment capacity of approximately 20 MGD but currently produces an average of approximately 16 MGD of recycled water. A portion of the treated effluent is delivered to recycled water distribution systems of LADWP and the City of Glendale. LADWP utilizes the recycled water from LAGWRP primarily to provide irrigation for golf courses, cemeteries, and other sites located in and around Griffith Park and the HWSG property. This water is delivered via a recycled water pipeline that runs within Forest Lawn Drive adjacent to the HWSG property. A portion of the recycled water produced at LAGWRP that is not delivered to the recycled water system is discharged to the Los Angeles River.

The proposed AWPF would be designed to receive an average flow of approximately 1.38 MGD of recycled water from LAGWRP. For the purposes of this assessment, it is assumed that the entire 1.38 MGD average provided by LAGWRP to the DPR Demonstration Facility would otherwise be discharged to the Los Angeles River adjacent to LAGWRP. This water would be conveyed from LAGWRP to the HWSG property via the existing recycled water pipeline in Forest Lawn Drive. The recycled water influent to the AWPF would be directed to the various treatment trains, where it would be processed to produce purified water. Because the DPR Demonstration Facility is intended to test and verify various advanced treatment technologies and processes and is not intended or approved to supply drinking water, the water processed through the AWPF would not be discharged into the LADWP potable water system. Instead, the water would be continually discharged into the Los Angeles River adjacent to HWSG.

The various treatment trains in the AWPF would utilize micro-filtration and reverse osmosis processes. Some byproducts resulting from these processes, including backwash water used to clean the micro-filtration strainers and membranes and waste solutions from cleaning of the micro-filtration and reverse osmosis equipment, would not be suitable for discharge to the river. These process losses would represent approximately 15 percent by volume of the original recycled water influent to the AWPF, or approximately 0.21 MGD. Therefore, an average of approximately 1.17 MGD of water (85 percent of the 1.38 MGD of influent) would be discharged from the AWPF to the river at HWSG. This discharged water would include the reject water from the AWPF reverse osmosis processes, which would contain a high concentration of dissolved solids and would be remixed with the purified water prior to discharge to rebalance the water with minerals. Since the final step of the water purification process at the AWPF for all treatment trains is the addition of chlorine, the purified water would also be dechlorinated prior to discharge to the river.

The process losses, consisting of an average of approximately 0.21 MGD (15 percent of the

AWPF 1.38 MGD influent) that would not be suitable for discharge to the river would instead be returned via the existing sewer system to LAGWRP for additional processing. The tertiary treatment of this returned water at LAGWRP would produce a sludge byproduct of approximately 18 percent by volume (less than 0.04 MGD), which would be conveyed in the existing sanitary sewer system to Hyperion Water Reclamation Plant in El Segundo. The remaining recycled water (approximately 0.17 MGD) would be available for discharge to the Los Angeles River from LAGWRP.

In summary, at the outset of the DPR facility operations, 1.38 MGD would be diverted from the river at LAGWRP and conveyed to the HWSG property, which is located approximately 3.5 miles upriver. Approximately 1.17 MGD would be discharged back to the river from the DPR Demonstration Facility, resulting in an increase in the flows in the river by an average of 1.17 MGD in the reach between the HWSG property and LAGWRP after project implementation compared to current average conditions. The balance of the water processed through the proposed AWPF that would not be discharged to the river at HWSG (approximately 0.21 MGD) would be returned to LAGWRP to receive tertiary treatment. During this treatment, process losses of less than 0.04 MGD would occur, and approximately 0.17 MGD of recycled water effluent would be available for discharge to the river at LAGWRP. Therefore, combined with the 1.17 MGD downriver flow from the AWPF discharge, a total of 1.34 MGD of the original 1.38 MGD diverted from the river at LAGWRP and conveyed to the AWPF would be returned to the river (a reduced net discharge of less than 0.04 MGD). Once the treatment process at the AWPF is underway, a discharge volume in the amount of 1.34 MGD (over 97 percent of the original diversion) would be in equilibrium within the river adjacent to LAGWRP.

The reduction in discharge of 0.04 MGD to the Los Angeles River downstream of LAGWRP would represent a decrease in flow of approximately 0.06 cubic feet per second, resulting in a reduction in depth of approximately 0.1 millimeter or less, depending on the location in the river, which would represent an essentially immeasurable change and is, therefore, considered de minimis.

As discussed, operation of the proposed DPR Demonstration Facility would not substantially affect discharges to the Los Angeles River. Additionally, all flows to the river would be treated to all applicable water quality standards at either the proposed AWPF or LAGWRP prior to discharge. The effluent not suitable for discharge to the Los Angeles River would be conveyed in the existing sanitary sewer system to the Hyperion Water Reclamation Plant. Therefore, with adherence to existing regulations and requirements, operation of the proposed project would not violate any water quality standards or waste discharge requirements. The impact would be less than significant.

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

**No Impact.** During construction, the proposed project would not require excavation to a depth that would encounter groundwater, affect the rate of groundwater recharge, or involve the extraction of groundwater. Construction activities would require water for dust control during demolition, grading, and construction activities. Water for these activities would be supplied from existing water connections or would be transported in trucks from an off-site source. As such, no impacts to local groundwater supplies or groundwater recharge would occur during project operation.

During operation, potable water would be required for various purposes at the proposed WQL,

DPR Demonstration Facility, and Headworks Restoration Park. The project would not use large amounts of water that would substantially deplete groundwater supplies nor would it interfere with groundwater recharge. Therefore, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, and no impact would occur.

**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 or through the addition of impervious surfaces, in a manner which would:**

**i. Result in substantial erosion or siltation on- or off-site?**

**Less Than Significant Impact.** During construction, grading and excavation activities would expose soils and leave them susceptible to erosion. As previously discussed, transport of sediments from the project site by stormwater runoff and winds would be prevented through best management practices such as implementation of Rule 403 dust control measures required by the SCAQMD and a SWPPP for construction activities in compliance with the latest Los Angeles Regional Water Quality Control Board's NPDES permit requirements for stormwater discharges. With adherence to existing regulations and implementation of preventative measures, construction impacts associated with erosion and siltation would be less than significant.

Following construction, the project site would have more impervious surfaces. However, the project would comply with the City's LID ordinance to reduce the volume and intensity of stormwater flows such that the erosion created by runoff from impervious surfaces would be controlled. Additionally, stormwater would be captured and utilized to the extent possible to provide water for irrigation of plants, minimizing the amount of stormwater runoff from the site that could lead to erosion or siltation. Therefore, there would be no substantial soil erosion or siltation would occur during project operations, and the impact would be less than significant.

**ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?**

**Less Than Significant Impact.** LADWP would develop and implement an erosion control plan and SWPPP to control runoff from the project site during construction. With adherence to existing regulations and implementation of preventative measures, impacts associated with surface runoff would be less than significant during construction.

As previously discussed, the proposed project would comply with the City's LID ordinance to reduce the volume and intensity of runoff from the project site. Additionally, stormwater would be captured and utilized to the extent possible to provide water for irrigation of plants, minimizing the amount of stormwater runoff from the site that could result in flooding. The impact would be less than significant.

**iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**

**Less Than Significant Impact.** As previously discussed, an erosion control plan and SWPPP would be implemented to control runoff during construction. Similar to existing conditions, excess storm flows from the project site would be diverted to the Los Angeles River via storm drain inlets located in the eastern end of the HWSG property. Additionally, stormwater would be captured and

reused to the extent possible at the project site, minimizing the amount of stormwater runoff from the site. Furthermore, the project would comply with the City's LID ordinance to reduce the volume of and capture stormwater flows such that they would not exceed the capacity of the existing stormwater drainage system. The impact would be less than significant.

**iv. Impede or redirect flood flows?**

**No Impact.** The HWSG property is not located within a flood zone.[31] Therefore, the project would not impede or redirect flood flows. No impact would occur.

**d) Would the project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?**

**No Impact.** As discussed in Section 3.10(c)(iv) above, the project site is not located in a flood hazard zone. Therefore, no impact related to such a hazard would occur.

Tsunamis are large ocean waves caused by the sudden water displacement that results from an underwater earthquake, landslide, or volcanic eruption. Tsunamis affect low-lying areas along the coastline. The project site is located approximately 14.5 miles northeast of the Pacific Ocean and is not located within a tsunami inundation area.[32] No impact would occur.

Seiches are oscillations generated in enclosed bodies of water usually as a result of earthquake related ground shaking. The project site is not located within the inundation zone of any enclosed water bodies or open reservoirs. Therefore, no impact would occur.

**e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

**Less Than Significant Impact.** As previously discussed, LADWP would develop and implement an erosion control plan and SWPPP pursuant to the NPDES permit requirements to control runoff from the project site during construction. Operation of the proposed project is not anticipated to create runoff in excess of or in varying quality to existing conditions. Following project construction, stormwater would be captured and reused to the extent possible. Implementation of the proposed project would not include the extraction of groundwater. Therefore, the project would not obstruct implementation of a water quality control plan or sustainable groundwater management plan. The impact would be less than significant.

[31] Federal Emergency Management Agency (FEMA). Flood Map Service Center, Search by Location. Available at: https://msc.fema.gov/portal/search. Accessed January 19, 2024.

[32] City of Los Angeles, Emergency Management Department. *2018 Local Hazard Mitigation Plan*. Available at: https://emergency.lacity.gov/sites/g/files/wph1791/files/2021-10/2018_LA_HMP_Final_with_maps_2018-02-09.pdf. Accessed January 19, 2024.

## 3.11 Land Use and Planning

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| *Would the project:* | | | | |
| a) Physically divide an established community? | ☐ | ☐ | ☐ | ☒ |
| b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | ☐ | ☐ | ☐ | ☒ |

### Discussion

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

**No Impact.** The proposed project would develop the proposed WQL, DPR Demonstration Facility, and Headworks Restoration Park completely within the existing HWSG property. The project site is currently fenced, and public access to the site is prohibited. Portions of the project site would be opened to the public after project implementation with the development of the Headworks Restoration Park as well as the DPR Demonstration Facility visitor center. Neither construction nor operation of the proposed project would include any physical barriers that would divide an established community. Instead, the proposed Headworks Restoration Park would provide connections to Forest Lawn Drive for pedestrians and cyclists. Similarly, the design and construction of the bicycle path will allow for future connections to be made to the existing LA River Trail. Therefore, the proposed project would not divide an established community, and no impact would occur.

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

**No Impact.** The proposed project would develop the WQL, DPR Demonstration Facility, and Headworks Restoration Park within the existing HWSG property. The proposed project would also include roads interior to the HWSG property, surface parking for staff and visitors, landscaping, and security lighting and fencing where required. The eastern half of the project site is currently developed with the Headworks Water Complex, while the western portion is undeveloped but highly disturbed from previous excavation, earth work, and grading.

The HWSG property is located on parcels zoned OS-1XL-H-RIO (Open Space). The property is owned by LARAP, but LADWP retains an easement over the entire 43 acres. The Headworks Restoration Park would provide passive open-space recreation uses, including a segment of the Los Angeles River Trail system which will allow for future linking to adjacent recreation areas and trails, consistent with the goals of the LA River Master Plan and the zoning designation of the property.

The WQL and DPR Demonstration Facility would not be consistent with the site zoning. However, as previously discussed, for more than a century, the HWSG property has been used as a source for water extraction, storage, and distribution for the City associated with the adjacent Los Angeles River and the San Fernando Groundwater Basin. It once served as the City's "headworks" for groundwater extraction and distribution, and featured facilities such dams, conduits, infiltration galleries, wells, and spreading grounds to feed the City's water system. While the facilities

associated with the spreading grounds are no longer present, the Headworks Water Complex was recently constructed on the property to replace the storage capacity of the Silver Lake Reservoir Complex. Consistent with past uses at the property, the WQL and DPR Demonstration Facility would be water assets as defined under City of Los Angeles Charter (Charter) Section 672(a), which encompasses all "water rights of every nature and kind owned or controlled by the City, and all the lands, rights-of-way, sites, facilities and property used for the capture, transportation, distribution and delivery of water for the benefit of the City." The City's water assets are under the exclusive control of the Board of Water and Power Commissioners, subject to City Council oversight under Charter Section 245. As per Charter Section 675(a), the Board has "the power and duty to make and enforce all necessary rules and regulations governing the construction, maintenance, operation, connection to and use of the Water and Power Assets for [LADWP] Purposes." Therefore, the proposed project would be exempt from zoning review, or any approval process administered by the Department of City Planning.[33] As such, the proposed project would not conflict with land use plans, policies, or regulations that have been adopted for the purpose of avoiding or mitigating an environmental effect and would be similar to long-standing use of the HWSG property. Therefore, no impact would occur.

[33] Department of City Planning. Inter-Departmental Correspondence. September 28, 2022.

## 3.12 Mineral Resources

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| *Would the project:* | | | | |
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | ☐ | ☐ | ☐ | ☒ |
| 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? | ☐ | ☐ | ☐ | ☒ |

### Discussion

**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.** California's Surface Mining and Reclamation Act of 1975 (SMARA) requires the State Geologist to classify land into mineral resource zones based on the known or inferred mineral resource potential of that land. The California Department of Conservation's Mineral Resources Program provides data about California's varied non-fuel mineral resources, and information about active and historic mining activities throughout the state.[34] Classification is completed by the State Geologist into Mineral Resource Zones (MRZ) wherein lands classified MRZ-1 are areas where geologic information indicates little likelihood exists for the presence of significant Portland cement concrete aggregate resources, lands classified MRZ-2 are areas where geologic information indicates the presence of significant Portland cement concrete aggregate resources, and lands classified MRZ-3 are areas containing known or inferred Portland cement concrete aggregate resource of undetermined mineral resource significance.[35]

According to the California Department of Conservation CGS Information Warehouse: Mineral Land Classification data mapper, the HWSG property is located on lands classified MRZ-2.[36] MRZ-2 sites contain potentially significant aggregate resources, which are to be conserved. Any proposed development plan must consider access to the deposits for the purposes of extraction. However, the HWSG property has been used as a source for water extraction, storage, and distribution for the City, including facilities such dams, conduits, infiltration galleries, wells, and spreading grounds, for over a century. The HWSG property has never been nor is it currently being used for purpose of mineral extraction, and the proposed project would not include any mineral extraction activities. Therefore, the proposed project would not result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state, and no impact would occur.

[34] California Department of Conservation. 2023. The California Mineral Resources Program. Available at: https://www.conservation.ca.gov/cgs/mrp. Accessed January 19, 2024.

[35] Wesoloski, C., Reioux, D., Callen, B. 2021. California Geological Survey *Updated Mineral Resource Zones for Portland Cement Concrete Aggregate in the San Fernando Valley and Saugus-Newhall Production-Consumption Regions.* Available at: https://www.conservation.ca.gov/cgs/Documents/Publications/Special-Reports/SR_254-MLC-SanFernandoValleySaugusNewhallPCR-2021-Plate01-MRZs-a11y.pdf. Accessed January 19, 2024.

[36] Ibid.

**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.** According to the City of Los Angeles General Plan Conservation Element, the project site is not delineated as a locally-important mineral resource recovery site.[37] Additionally, the HWSG property does not contain any oil wells. The proposed project would not affect any existing oil, gas, or other mineral resource recovery facilities. Therefore, implementation of the proposed project would not result in the loss of availability of a locally-important mineral resource recovery site, and no impact would occur.

[37] City of Los Angeles, Department of City Planning. *City of Los Angeles General Plan – Conservation Element*. Available at: https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf. Accessed January 19, 2024.

## 3.13 Noise

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| *Would the project result in:* | | | | |
| a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | ☐ | ☒ | ☐ | ☐ |
| b) Generation of excessive groundborne vibration or groundborne noise levels? | ☐ | ☐ | ☐ | ☒ |
| c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | ☐ | ☐ | ☐ | ☒ |

### Discussion

Potential impacts related to noise resulting from implementation of the proposed project were determined from the results presented in the Noise and Vibration Impact Study prepared for the proposed project, which is included as Appendix F to this IS/MND.

The standard unit of measurement for noise is the decibel (dB). Since the human ear is not equally sensitive to sound at all frequencies, the noise measurements reflected in this analysis are given in dB reflecting the normal hearing sensitivity range of the human ear, known as the A-weighted decibel scale (dBA). On this scale, the range of human hearing extends from approximately 3 to 140 dBA. The noise analysis discusses sound levels in terms of Equivalent Noise Level ($L_{eq}$). $L_{eq}$ is the average noise level on an energy basis for any specific time period. For example, the $L_{eq}$ for one hour is the energy average noise level during the hour. The average noise level is based on the energy content (acoustic energy) of the sound. $L_{eq}$ can be thought of as the level of a continuous noise which has the same energy content as the fluctuating noise level.

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

**Less Than Significant Impact with Mitigation Incorporated.**

### Construction

Table 3-5 shows noise levels associated with various pieces of construction equipment. Construction noise levels were calculated using the Federal Highway Administration Roadway Construction Noise Model. Noise levels would fluctuate depending on equipment type, horsepower, and atmospheric conditions, among other factors. Construction equipment is expected to generate noise levels ranging from approximately 63.2 dBA $L_{eq}$ to 81.0 dBA $L_{eq}$ at a distance of 50 feet, and noise produced by construction equipment would be reduced over distance at a rate of about 6 dB per doubling of distance.

**Table 3-5: Construction Noise Levels by Phase and Equipment Type**

| Noise Source | Noise Level (dBA)$L_{eq}$ at 50 Feet |
|---|---|
| **MAXIMUM CONSTRUCTION PHASE - 39 EQUIPMENT PIECES** | |
| Air Compressor | 73.7 |
| Backhoe | 73.6 |
| Forklift | 63.2 |
| Generator | 77.6 |
| Grader | 81.0 |
| Loader | 75.1 |
| Manlift | 67.7 |
| Pickup Truck | 71.0 |
| Roller | 73.0 |
| Skiploader | 75.1 |
| Water Truck | 70.3 |
| Welding Machine | 70.0 |
| **39 Equipment Pieces Combined Noise Level** | **83.8[a]** |
| **TYPICAL CONSTRUCTION SCENARIO - 15 EQUIPMENT PIECES** | |
| Bobcat | 64.3 |
| Concrete Pump Truck | 74.4 |
| Forklift | 63.2 |
| Generator | 70.0 |
| Grader | 81.0 |
| Loader | 75.1 |
| Pickup Truck | 71.0 |
| Roller | 73.0 |
| Skiploader | 75.1 |
| Water Truck | 70.3 |
| **15 Equipment Pieces Combined Noise Level** | **79.7[b]** |
| **TYPICAL CONSTRUCTION SCENARIO – 5 EQUIPMENT PIECES** | |
| Excavator | 76.7 |
| Manlift | 67.7 |
| Pickup Truck | 71.0 |
| Skiploader | 75.1 |
| Water Truck | 70.3 |
| Excavator | 76.7 |
| **5 Equipment Pieces Combined Noise Level** | **76.3[c]** |

a. Logarithmic sum of four pieces of equipment at one location.
b. Logarithmic sum of three pieces of equipment at one location.
c. Logarithmic sum of two pieces of equipment at one location.
Source: Federal Highway Administration, Roadway Construction Noise Model Version 1.1. Table Source: TAHA, 2024.

Construction activities typically require the use of numerous pieces of noise-generating equipment. The noise levels shown in Table 3-5 consider the likelihood that multiple pieces of construction equipment would be operating simultaneously and the typical overall noise levels that would be expected for each phase of construction throughout the approximately four-year construction period. Three construction scenarios were studied, including the maximum construction phase, in which 39 pieces of equipment would be operating, and two typical construction phases, in which either 15 or 5 pieces of equipment would be operating. Equipment would be spread throughout the project site for the duration of construction and would typically

not present a concentrated noise source. The combined construction noise levels are based on work zones where two to four pieces of equipment may be operating simultaneously at one time. When considered as an entire process with multiple pieces of equipment, the construction scenario during which 39 pieces of equipment would be used on site would be the loudest phase of construction and would generate a noise level of approximately 83.8 dBA $L_{eq}$ at 50 feet.

Noise associated with construction is controlled by the City of Los Angeles Noise Ordinance. Therefore, the proposed project would result in a significant impact if construction equipment noise levels would exceed 75 dBA at a noise-sensitive use (unless technically infeasible) or if construction would occur between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, or anytime on Sunday. Construction activity for the project would be limited to daytime hours and would not occur between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, or anytime on Sunday.

Table 3-6 presents the estimated noise levels at the sensitive receptors nearest to the project site as well as the incremental increase in noise associated with project construction. The combined equipment noise level for each of the three construction scenarios studied was used to predict noise during each construction scenario. The most noise-intensive construction activities would occur during the early phases of construction (e.g., excavation and grading). The majority of the latter phases of construction would involve smaller equipment or would occur within the interior of buildings, and result in lower noise levels. As shown in Table 3-6, noise levels would potentially exceed 75 dBA at the two closest receptors during the maximum construction phase, in which 39 pieces of equipment would be operating on-site. As such, mitigation measures NOI-1 through NOI-5 would be required to reduce construction equipment noise levels.

The last two columns in Table 3-6 show the estimated construction noise levels with implementation of the mitigation measures and indicate whether the threshold would be exceeded. The equipment mufflers associated with mitigation measure NOI-1 would reduce construction noise levels by approximately 5 dBA. Mitigation measures NOI-2 through NOI-5, would also reduce and/or control construction noise levels but are difficult to quantify. Therefore, no numeric reduction in noise has been incorporated for these latter measures. As shown in Table 3-6, the mitigation measures would reduce the construction noise levels at all sensitive receptors to below the 75 dBA threshold. Therefore, with implementation of mitigation measures NOI-1 through NOI-5, construction equipment noise levels would be less than significant.

**Table 3-6: Construction Equipment Noise Levels Without and With Mitigation**

| Sensitive Receptor | Distance (feet) | Existing Noise Level (dBA, $L_{eq}$)[a] | Without Mitigation | | With Mitigation | |
|---|---|---|---|---|---|---|
| | | | Project Noise Level (dBA, $L_{eq}$) | Exceed Threshold (75 dBA, $L_{eq}$)? | Project Noise Level (dBA, $L_{eq}$) | Exceed Threshold (75 dBA, $L_{eq}$)? |
| **MAXIMUM CONSTRUCTION PHASE – 39 EQUIPMENT PIECES** | | | | | | |
| Forest Lawn Cemetery Property Line | 100 | 72.2 | 77.8 | Yes | 72.8 | No |
| Mount Sinai Cemetery Property Line | 100 | 72.2 | 77.8 | Yes | 72.8 | No |
| Mount Sinai Chapel | 150 | 61.4 | 74.3 | No | 69.3 | No |
| Forest Lawn Cemetery Interior | 300 | 55.3 | 68.2 | No | 63.2 | No |
| Mount Sinai Cemetery Interior | 300 | 56.5 | 68.2 | No | 63.2 | No |
| **TYPICAL CONSTRUCTION SCENARIO – 15 EQUIPMENT PIECES** | | | | | | |
| Forest Lawn Cemetery Property Line | 100 | 72.2 | 73.7 | No | 68.7 | No |
| Mount Sinai Cemetery Property Line | 100 | 72.2 | 73.7 | No | 68.7 | No |
| Mount Sinai Chapel | 150 | 61.4 | 70.2 | No | 65.2 | No |
| Forest Lawn Cemetery Interior | 300 | 55.3 | 64.1 | No | 59.1 | No |
| Mount Sinai Cemetery Interior | 300 | 56.5 | 64.1 | No | 59.1 | No |
| **TYPICAL CONSTRUCTION SCENARIO – 5 EQUIPMENT PIECES** | | | | | | |
| Forest Lawn Cemetery Property Line | 100 | 72.2 | 70.3 | No | 65.3 | No |
| Mount Sinai Cemetery Property Line | 100 | 72.2 | 70.3 | No | 65.3 | No |
| Mount Sinai Chapel | 150 | 61.4 | 66.8 | No | 61.8 | No |
| Forest Lawn Cemetery Interior | 300 | 55.3 | 60.7 | No | 55.7 | No |
| Mount Sinai Cemetery Interior | 300 | 56.5 | 60.7 | No | 55.7 | No |

a. The average hourly noise level for weekday daytime (7:00 a.m. to 9:00 p.m.) activities.
**SOURCE:** TAHA, 2024.

Haul trucks associated with construction activity would potentially increase noise levels along the haul route. The anticipated haul route is the SR-134 Freeway to Forest Lawn Drive then to the project site. The greatest number of daily haul truck trips that would occur would be approximately 16 haul trucks or 32 one-way trips. This would equate to approximately four truck trips per hour. According to the Los Angeles Department of Transportation, Forest Lawn Drive in the vicinity of the project site experiences approximately 21,299 vehicle trips per day with an AM and PM peak hour volume of 1,845 trips, and 1,661 trips, respectively. The off-peak hours of 10:00 a.m. to 3:00 p.m. averages approximately 1,158 trips per hour. A doubling of traffic volumes is typically needed to audibly increase noise levels along a roadway. The addition of four haul truck trips per hour during any portion of the day during typical construction hours would not result in a doubling of traffic volumes. Therefore, the proposed project would result in a less than significant impact related to haul truck noise.

### *Mitigation Measures*

**NOI-1** Construction equipment shall be properly maintained and equipped with mufflers to manufacturer specifications.

**NOI-2** Rubber-tired equipment shall be used rather than tracked equipment when feasible.

**NOI-3** Equipment shall be turned off when not in use for an excess of five minutes, except for equipment that requires idling to maintain performance.

**NOI-4** A public liaison shall be appointed for project construction will be responsible for addressing public concerns about construction activities, including excessive noise. As needed, the liaison shall determine the cause of the concern (e.g., starting too early, bad muffler) and implement measures to address the concern.

**NOI-5** The public shall be notified in advance of the location and dates of construction hours and activities.

### Operation

The operational analysis assesses noise related to mechanical equipment, recreational activities, parking activities, and off-site vehicle movements associated with all components of the proposed project. In addition to measuring noise levels in $L_{eq}$, the change in community noise levels is also measured as the Community Noise Equivalent Level (CNEL). CNEL is the average A-weighted noise level during a 24-hour day that includes an addition of 5 dBA to measured noise levels between the hours of 7:00 p.m. and 10:00 p.m. and an addition of 10 dBA to noise levels between the hours of 10:00 p.m. and 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively. A significant impact would result during project operation if the ambient noise level measured at the property line of the nearest sensitive receptors increases by 3 dBA CNEL to or within 70 to 75 dBA CNEL, or any 5 dBA or more increase in noise level.

### *Noise from Mechanical Equipment*

Mechanical sources of noise would typically be located on the rooftops of the WQL and the DPR Demonstration Facility. Heating, ventilation, and air conditioning (HVAC) equipment typically generates noise levels of approximately 50 dBA at 50 feet. The noise level was then calculated for the use of 10 HVAC units on the near side of the proposed buildings to sensitive receptors which would result in an approximate noise level of 60 dBA at 50 feet. As shown in Table 3-7, HVAC equipment would not generate audible noise at offsite land uses. In addition, HVAC noise would be less than the existing noise level and would result in a 0.1 dBA $L_{eq}$ increase in noise. As such, the estimated ambient noise levels at all off-site receptor locations with the addition of the project's mechanical equipment would be below the significance criteria. Therefore, the project would not result in a substantial temporary or permanent increase in ambient noise levels related to mechanical equipment noise.

**Table 3-7: Mechanical Equipment Noise Analysis**

| Sensitive Receptor | Distance (feet) | Existing Noise Level (dBA, $L_{eq}$) | Noise Level (dBA, $L_{eq}$) | New Ambient Noise Level (75 dBA, $L_{eq}$) | Noise Level Increase (dBA, $L_{eq}$) | Exceed Threshold (+5 dBA, $L_{eq}$)? |
|---|---|---|---|---|---|---|
| Mount Sinai Cemetery Property Line | 200 | 72.2 | 48.0 | 72.2 | 0.0 | No |
| Forest Lawn Cemetery Property Line | 370 | 72.2 | 42.6 | 72.2 | 0.0 | No |
| Mount Sinai Funeral Home | 530 | 61.4 | 39.5 | 61.5 | 0.1 | No |

Source: TAHA, 2024.

### *Noise from Recreation Use*

The proposed project would include the construction of new passive recreational facilities, including the proposed Headworks Restoration Park. Surrounding the garden and extending into other portions of the HWSG property would be a series of pedestrian pathways. A bicycle path would be constructed along the northern portion of the property which will allow for future interconnections with Griffith Park and the existing river trail system. The park would be developed in the eastern portion of the property and would include parking, a pavilion building, trails, and site landscaping, located in adjacent areas. The main noise source from the park would be conversational noise. A normal speaking voice generates a noise level of approximately 57.8 dBA $L_{eq}$ at 3 feet. The park is anticipated to generate approximately two vehicle trips during the peak hour. Conservatively it has been assumed that 25 people would be located in one area of the park which would generate a noise level of approximately 71.8 dBA, $L_{eq}$ at 3 feet.

Noise levels from the park at off-site sensitive receptors are shown in Table 3-8. This noise would be overshadowed by existing noise sources such as traffic noise generated by Forest Lawn Drive and the SR-134 Freeway. If the noise source is not audible at off-site uses, then there is no potential for an increase in the 24-hour CNEL noise level to occur. Park activity noise would therefore not increase noise levels at adjacent receptors by 3 dBA CNEL to or within 70 to 75 dBA CNEL or increase noise levels by 5 dBA CNEL or more. Therefore, the proposed project would not result in a substantial temporary or permanent increase in ambient noise levels related to recreational activity noise.

**Table 3-8: Headworks Restoration Park Noise Analysis**

| Sensitive Receptor | Distance (feet) | Existing Noise Level (dBA, $L_{eq}$) | Noise Level (dBA, $L_{eq}$) | New Ambient Noise Level (75 dBA, $L_{eq}$) | Noise Level Increase (dBA, $L_{eq}$) | Exceed Threshold (+5 dBA, $L_{eq}$)? |
|---|---|---|---|---|---|---|
| Mount Sinai Cemetery Property Line | 300 | 72.2 | 31.8 | 72.2 | 0.0 | No |
| Forest Lawn Cemetery Property Line | 570 | 72.2 | 26.2 | 72.2 | 0.0 | No |
| Mount Sinai Chapel | 650 | 61.4 | 25.1 | 61.4 | 0.0 | No |

Source: TAHA, 2024.

### *Noise from Vehicle Parking*

Parking would be provided for the WQL, DPR Demonstration Facility, and the Headworks Restoration Park. Parking noise typically includes engine starting, tire noise, and vehicle movements. Passenger vehicles traveling within a parking lot at low speed would generate a noise level of approximately 50 dBA at 50 feet. Parking noise was calculated based on the number of peak hour trips associated with each of the three project components. As shown in Table 3-9, the Water Quality lab would generate the highest noise level of approximately 44.5 dBA $L_{eq}$ at 50 feet. Table 3-10 shows the parking noise from each project component at each of the sensitive receptors.

**Table 3-9: Parking Activity Noise Levels**

| Parking Lot Location | Average Peak Hour Vehicle Volume | Parking Noise Level at 50 Feet (dBA, $L_{eq}$) |
|---|---|---|
| Water Quality Lab | 65 | 44.5 |
| DPR Demonstration Facility | 2 | 29.4 |
| Headworks Restoration Park Parking Lot | 2 | 29.4 |

Source: TAHA, 2022.

**Table 3-10: Parking Activity Noise Analysis**

| Sensitive Receptor | Distance (feet)[a] | Existing Noise Level (dBA, $L_{eq}$) | Combined Parking Noise Level (dBA, $L_{eq}$)[a] | New Ambient Noise Level (75 dBA, $L_{eq}$) | Noise Level Increase (dBA, $L_{eq}$) | Exceed Threshold (+5 dBA, $L_{eq}$)? |
|---|---|---|---|---|---|---|
| Mount Sinai Cemetery Property Line | Variable | 72.2 | 30.7 | 72.2 | 0.0 | No |
| Forest Lawn Cemetery Property Line | Variable | 72.2 | 29.0 | 72.2 | 0.0 | No |
| Mount Sinai Chapel | Variable | 61.4 | 25.5 | 61.4 | 0.0 | No |

a. Distance to each sensitive receptor from each parking lot would vary; these distances are included in Appendix F.
Source: TAHA, 2024.

Project parking noise would be overshadowed by existing noise sources such as traffic noise generated by Forest Lawn Drive and the SR-134 Freeway. If a noise source is not audible at off-site uses, there is no potential for an increase in the 24-hour CNEL noise level to occur. Noise at the parking lots for the project components would therefore not increase noise levels at adjacent receptors by 3 dBA CNEL to or within 70 to 75 dBA CNEL or increase noise levels by 5 dBA CNEL or more. Therefore, the proposed project would not result in a substantial temporary or permanent increase in ambient noise levels related to parking noise.

### *Noise from Off-Site Vehicle Movements*

The proposed project would generate approximately 608 daily vehicle trips, including 72 AM peak hour trips and 60 PM peak hour trips.[38] According to the Los Angeles Department of Transportation, Forest Lawn Drive in the vicinity of the project site experiences approximately 21,299 vehicle trips per day with an AM and PM peak hour volume of 1,845 trips, and 1,661 trips,

[38] Project trip generation estimates are presented in Appendix I to this IS/MND.

respectively. A doubling of traffic volumes is typically needed to audibly increase noise levels along a roadway. The addition of 72 vehicle trips per hour during the AM peak hour and 60 trips during PM peak hour would not result in a doubling of traffic volumes. Therefore, the proposed project would not result in a substantial temporary or permanent increase in ambient noise levels related to operational mobile noise.

***Composite Noise Level Impacts from Proposed Project Operation***

In addition to considering the potential noise impacts resulting from individual on-site stationary noise, including mechanical equipment noise, Headworks Restoration Park noise, parking noise, and off-site mobile noise, noise levels of all activities during project operation were assessed. As presented in the analysis of operational noise sources in this section, the various individual sources of noise would not be audible at the sensitive receptors. During project operation, the noise sources would be dispersed throughout the project site and would not present a concentrated noise source that would be greater than the individual sources. As the proposed project's operational sources of noise would not be audible off site, there is no potential to increase noise levels at adjacent receptors by 3 dBA CNEL to or within 70 to 75 dBA CNEL or increase noise levels by 5 dBA CNEL or more. Therefore, the proposed project would not result in a substantial temporary or permanent increase in ambient noise levels related to operational noise.

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

**No Impact.** Vibration can be interpreted as energy transmitted in waves through the ground or man-made structures, which generally dissipate with distance from the vibration source. Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Since energy is lost during its transfer from one particle to another, vibration becomes less perceptible with increasing distance from the source. Several different methods are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal in inches per second (in/sec) and is most frequently used to describe vibration impacts to buildings. The decibel notation (VdB) acts to compress the range of numbers required to describe vibration. Typically, groundborne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Sensitive receptors for vibration include buildings where vibration would interfere with operations within the building or cause damage (especially older masonry structures), locations where people sleep, and locations with vibration sensitive equipment.

Groundborne noise specifically refers to the rumbling noise emanating from the motion of building room surfaces due to the vibration of floors and walls; it is perceptible only inside buildings.

**Construction**

Construction activity can generate varying degrees of vibration, depending on the procedure and equipment. The construction phases that would typically generate higher vibration levels include clearing, excavation, and grading and foundations due to the use of heavier pieces of construction equipment, that are similar to a large bulldozer. Equipment movements generate vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of a construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver buildings. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and

perceptible vibration at moderate levels, and to slight damage at the highest levels. In most cases, the primary concern regarding construction vibration relates to damage.

Based on visual characteristics of adjacent structures (e.g., age), building foundations are assumed to be constructed of engineered timber and masonry. According to the Federal Transit Authority guidance, buildings constructed of engineered concrete and masonry can withstand vibration levels up to 0.3 inches per second without experiencing damage. Equipment that would be utilized in construction of the proposed project components would be most similar to a bulldozer and loaded trucks. Vibration levels for various types of construction equipment with an average source level reported in terms of velocity are shown in Table 3-11.

**Table 3-11: Vibration Velocities for Construction Equipment**

| Equipment | Vibration Levels | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | PPV (Inches per Second) | | | | VdB (Micro-Inch per Second) | | | |
| | 25 Feet | 50 Feet | 75 Feet | 100 Feet | 25 Feet | 50 Feet | 75 Feet | 100 Feet |
| Large Bulldozer | 0.089 | 0.031 | 0.017 | 0.011 | 87 | 78 | 73 | 69 |
| Loaded Trucks | 0.076 | 0.027 | 0.015 | 0.010 | 86 | 77 | 72 | 68 |
| Small Bulldozer | 0.003 | 0.001 | 0.001 | 0.000 | 58 | 49 | 44 | 40 |

Source: Federal Transit Authority Transit Noise and Vibration Impact Assessment, September 2018; Table Source: TAHA, 2024.

Table 3-12 shows the estimated vibration levels at each sensitive receptor during project construction activities. Construction equipment would typically be located more than 100 feet from the off-site structures. However, the vibration levels shown in Table 3-12 are a conservative estimate based on a large bulldozer operating at the property boundary. Equipment activity at the property edge would be limited by space and the need for maneuvering; however, estimating vibration levels from this location would represent the closest construction activity to sensitive receptors. As shown in Table 3-12, the maximum vibration level at the nearest sensitive receptor would be approximately 0.011 inches per second, which would remain substantially below the 0.3 inches per second vibration damage threshold. Therefore, the proposed project would result in no impact related to vibration damage.

**Table 3-12: Vibration Damage Impact Analysis**

| Sensitive Receptor | Distance from Construction Activity | Reference Vibration Level (PPV) | PPV at Structure | Exceed 0.3 Inches/Second Threshold? |
|---|---|---|---|---|
| Mount Sinai Cemetery Property Line | 100 | 0.089 | 0.011 | No |
| Forest Lawn Cemetery Property Line | 100 | 0.089 | 0.011 | No |
| Mount Sinai Chapel | 150 | 0.089 | 0.006 | No |

Source: TAHA, 2024.

Perceptible vibration is not typically a concern for human health and is a common occurrence within the urban environment. However, special uses such as select medical facilities, research facilities, and recording studios could be potentially impacted by construction vibration due to the presences of sensitive equipment. No such uses have been identified within the project vicinity. Therefore, the proposed project would result in no impact related to vibration annoyance.

### Operation

The proposed project would not include a significant source of permanent vibration. Project-related vehicle trips could generate vibration, although similar to the existing condition, roadway vibration from passenger vehicles would not be perceptible outside of the road right-of-way. Therefore, no impact would occur related to operational vibration.

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

**No Impact.** The project site is not located within the vicinity of a private airstrip or two miles of a public airport or within an airport land use plan. The nearest airport is the Hollywood Burbank Airport, located approximately 3.3 miles from the project site. Due to the distance from the nearest airport, the proposed project would not expose people working or residing in the area to excessive aircraft noise. Therefore, no impact would occur.

## 3.14 Population and Housing

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| *Would the project:* | | | | |
| a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | ☐ | ☐ | ☐ | ☒ |
| b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? | ☐ | ☐ | ☐ | ☒ |

**Discussion**

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

**No Impact.** The proposed project would develop a WQL, DPR Demonstration Facility, and Headworks Restoration Park within the existing HWSG property, and would not include development of new homes and businesses. During construction, it is anticipated that construction workers would come from the labor pool currently residing in the region. Additionally, due to the temporary nature of construction, it is not likely that construction workers would relocate their households as a result of their employment associated with construction. As such, there would be no impact related to unplanned population growth during construction of the proposed project.

During operation, the proposed WQL would replace the existing obsolete LADWP laboratory facility, which is located in the City of Pasadena. The WQL would initially require an increase of 35 personnel above the current staffing at the Pasadena lab (62 personnel) to perform the laboratory functions required to meet state and federal regulations and ensure drinking water quality. In addition, 5 personnel would be transferred from the LADWP Rinaldi Yard in Granada Hills, where the water quality mobile laboratory and support trailers are currently located. This function would be entirely relocated to the proposed WQL. Over time, it is anticipated that the number of personnel at the WQL may increase to a maximum of 172 based on the requirement for additional laboratory procedures and on organizational changes that would involve the transfer of existing management and administrative staff from the LADWP headquarters building or other facilities in downtown Los Angeles. This increase in personnel from 102 to 172 may occur over a 10-year period and would not directly induce substantial unplanned population growth.

The proposed DPR Demonstration Facility would test various water purification technologies for treating recycled wastewater and would include an educational element to inform the public about DPR and other aspects of water use in the City. As a demonstration and educational facility, the proposed DPR Demonstration Facility would not expand infrastructure, and thus, would not indirectly induce unplanned population growth. The proposed Headworks Restoration Park would provide recreational access and educational opportunities regarding local ecosystems and water use to existing residents of the City and County of Los Angeles. The proposed Headworks Restoration Park would also include pedestrian pathways and a bicycle path on the northern portion of the property. This bicycle path would allow for future connection to the existing trail system of the Los Angeles River and Griffith Park. As such, the proposed Headworks Restoration

Park would not extend roads or infrastructure that would indirectly induce unplanned population growth. Therefore, the proposed project components would not directly or indirectly induce substantial unplanned population growth. No impact would occur.

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

**No Impact.** The proposed project would be developed completely within the existing HWSG property. The proposed project would not remove existing housing, and no people would be displaced as a result of project implementation. Therefore, the proposed project would not affect the number or availability of existing housing in the area and would not necessitate the construction of replacement housing elsewhere. No impact would occur.

## 3.15 Public Services

| | Potentially Significant Impact | Less Than Significant Impact 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: | | | | |
| i) Fire protection? | ☐ | ☐ | ☐ | ☒ |
| ii) Police protection? | ☐ | ☐ | ☐ | ☒ |
| ii) Schools? | ☐ | ☐ | ☐ | ☒ |
| iv) Parks? | ☐ | ☐ | ☐ | ☒ |
| v) Other public facilities? | ☐ | ☐ | ☐ | ☒ |

**Discussion**

**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:**

**i. Fire protection?**

**No Impact.** The proposed project would introduce new structures and visitors to the HWSG property. The site is within the service area of Los Angeles Fire Department Station Number 76, which currently provides response to areas adjacent to HWGS. Based on the location of HWGS within the service area and the types of uses provided under the proposed project, it is not anticipated that new or physically altered fire protection facilities would be required to maintain acceptable service ratios, response times or other performance objectives. In addition, as discussed in Section 3.14(a), the proposed project would not increase the permanent residential population in the area. As such increased demand for fire protection services is not expected to occur. Therefore, no impact would occur.

**ii. Police protection?**

**No Impact.** The site is within the service area of Los Angeles Police Department Northeast Community Station, which currently provides response to areas adjacent to HWGS. Although the proposed project would introduce new facilities and increase the number of people present on the site over existing conditions, it would not generate the need for new or physically altered police protection facilities to maintain acceptable service ratios, response times or other performance objectives. As discussed in Section 3.14(a), the proposed project would not increase the permanent residential population in the area. As such increased demand for police protection services is not expected to occur. Therefore, no impact would occur.

### iii. Schools?

**No Impact.** As discussed above, the proposed project would not increase the permanent residential population in the area. Therefore, no new or altered school facilities would be required. No impact would occur.

### iv. Parks?

**No Impact.** As stated previously, the proposed project would not increase the permanent residential population in the area, and, therefore, would not increase the demand for local and regional park facilities. Additionally, the Headworks Restoration Park component of the proposed project would fulfill a need for recreation with passive open-space recreation uses, including a segment of the Los Angeles River Trail system allowing for future linking to adjacent recreation areas and trails. Therefore, no impact would occur.

### v. Other public facilities?

**No Impact.** The proposed project does not include development of residential or commercial uses and would not increase the permanent residential population such that the demand for other public facilities would be increased. Therefore, the proposed project would not result in the need for new or physically altered public facilities. No impact would occur.

## 3.16 Recreation

| | Potentially Significant Impact | Less Than Significant Impact 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? | ☐ | ☐ | ☐ | ☒ |
| 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? | ☐ | ☐ | ☒ | ☐ |

**Discussion**

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

**No Impact.** The HWSG property was identified in the LA River Master Plan as a key location along the Los Angeles River that has the potential to create a public benefit and unifying feature for the diverse communities and existing trails along the river. The proposed project would develop the Headworks Restoration Park atop the West Reservoir, and would provide passive open-space recreation uses, including a pedestrian and bicycle trail as part of the Los Angeles River Trail system allowing for future linking to adjacent recreation areas and trails, consistent with the goals of the LA River Master Plan. As such, the proposed Headworks Restoration Park would be a beneficial use that would fulfill recreation needs in the region. Construction and operation of the proposed Headworks Restoration Park would not generate new permanent residents that would increase the use of existing parks and recreational facilities. Additionally, the proposed WQL and DPR Demonstration Facility have no potential to increase the use of existing parks or recreational facilities such that substantial physical deterioration of the facilities would occur. Therefore, no impact would occur.

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

**Less Than Significant Impact.** As discussed above, the proposed project would develop Headworks Restoration Park, which would be managed and maintained by LARAP. The proposed Headworks Restoration Park would provide new passive recreational opportunities for the public, including pathways, overlooks, and informal gathering spaces. The impacts related to the construction and operation of the proposed Headworks Restoration Park are assessed throughout this IS/MND, and would be less than significant.

## 3.17 Transportation

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| *Would the project:* | | | | |
| a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit roadway, bicycle and pedestrian facilities? | ☐ | ☐ | ☐ | ☒ |
| b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)? | ☐ | ☐ | ☒ | ☐ |
| c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | ☐ | ☐ | ☐ | ☒ |
| d) Result in inadequate emergency access? | ☐ | ☐ | ☐ | ☒ |

### Discussion

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

**No Impact.**

**Construction**

No transit facilities exist within the HWSG property. A Tier II bicycle lane is located along both the north and south sides of Forest Lawn Drive adjacent to the HWSG property.[39] Required modifications to traffic lanes would provide a westbound right-turn lane and an eastbound left-turn lane on Forest Lawn Drive at Mt. Sinai Drive. These modifications would be accommodated within the existing road right-of-way. The continuity of the bicycle lane may be disrupted on the north side of Forest Lawn Drive at Mt. Sinai Drive during construction of these modifications, but it would be restored after the lane modifications are complete. Modifications to the existing traffic signal at Mt. Sinai Drive would also be required.

Temporary lane closures may be required during construction of the intersection modifications at Forest Lawn Drive and Mt. Sinai Drive. Project construction activities would otherwise be confined to the HWSG property with the exception of haul and delivery trucks. Based on the projected level of truck trips, which would generally remain at fewer than 10 per day throughout construction, it is not anticipated that project construction would substantially disrupt traffic in the area, including automobile, bus, and bicycle traffic. A traffic control plan would be required and approved by the LADOT to maintain the flow of traffic, and there would be no permanent effects to a program, plan, ordinance, or policy related to the intersection modifications. Therefore, no impact would occur.

[39] City of Los Angeles, Department of City Planning. 2016. Mobility Plan 2035, An Element of the General Plan. Available at: https://planning.lacity.org/odocument/523f2a95-9d72-41d7-aba5-1972f84c1d36/Mobility_Plan_2035.pdf/ Accessed January 19, 2024.

### Operation

During operation, access to the existing bicycle lane on Forest Lawn Drive would be fully restored. Additionally, the proposed project would provide connections to existing bicycle and pedestrian paths and trails in the area surrounding the HWSG property. A major organizing element of Headworks Restoration Park is the HWSG segment of the LA River Trail, which would traverse the property from the secondary access gate on the west, across the northern perimeter, utilizing the transmission line right-of-way adjacent to the river. The trail would connect on the east to Forest Lawn Drive and allow for future connection to existing trails that pass through existing tunnels beneath Forest Lawn Drive into Griffith Park and SR-134 to the path running along the south side of the river. These future connections would provide a pedestrian and bicycle link for the Headworks Restoration Park to the regional trail system, which would also continue west of the HWSG property as future trail segments are implemented. Other pedestrian pathways would also be provided within the HWSG property, surrounding the reservoirs to the west, south, and east. As such, the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system. Therefore, no impact would occur during operation of the proposed project.

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

The following VMT analysis is based on the results presented in the Vehicle Miles Traveled Technical Memorandum prepared for the proposed project, which is included as Appendix G to this IS/MND.

**Less Than Significant Impact.** CEQA Guidelines section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. VMT refers to the amount and distance of automobile travel attributable to a project. The LADOT Transportation Assessment Guidelines (LADOT Guidelines) establish instructions and standards for preparation of transportation assessments in the City of Los Angeles.[40] The VMT assessment is intended to focus on the long-term, permanent transportation impacts related to the generation of automobile trips and the opportunities for alternative modes of transportation (public transit, walking, bicycling) associated with a development project. A significant VMT-related impact would occur if the project-generated miles traveled would exceed the thresholds established in the LADOT Guidelines.

LADOT has developed several screening criteria to identify whether a VMT analysis is required for a project. The primary screening criterion is a trip-based screening. If a project generates fewer than 250 daily trips, impacts are considered to be less than significant. As previously discussed, it is estimated that the proposed project would generate approximately 608 daily trips. Therefore, this screening criterion does not apply. The LADOT Guidelines also state that public services (e.g., police stations, fire stations, public utilities, public parks) are land uses that do not generally generate substantial VMT. The proposed project includes three components. Two of the components, the DPR Demonstration Facility (a water treatment function) and the Headworks Restoration Park (a public park), are public services that are presumed to have a less than significant VMT impact. Therefore, the DPR Demonstration Facility and the Headworks Restoration Park have been screened out from VMT analysis. The third project component, the WQL, although an LADWP function, would not meet the definition of a public service (i.e., a public utility) since it would serve as a laboratory and administrative facility rather than a traditional water

[40] City of Los Angeles Department of Transportation. Transportation Assessment Guidelines. July 2020. Available at: https://ladot.lacity.org/documents/transportation-assessment. Accessed January 19, 2024.

treatment, storage, or conveyance facility. Therefore, the WQL is subject to a VMT analysis.

As discussed in Chapter 1, Project Description, of this IS/MND, the proposed WQL would functionally replace the existing LADWP Pasadena and Rinaldi WQL facilities. The proposed WQL would operate 7 days a week, 12-hours a day, from 6 a.m. to 6 p.m. At the outset of operations, 102 personnel would report to the facility on weekdays in staggered shifts. Of this total, 62 personnel would be transferred from the existing laboratory building in Pasadena. The Pasadena facility is owned by LADWP, and it would not be backfilled with another department use or leased to an outside entity. In addition, 5 personnel would be transferred from the LADWP Rinaldi Yard in Granada Hills, where the water quality mobile laboratory and support trailers are currently located. This function would be entirely relocated to the proposed WQL.

The WQL would initially require an increase of 35 personnel above the current staffing at the Pasadena lab to perform the laboratory functions required to meet state and federal regulations and ensure drinking water quality. Over time, it is anticipated that the number of personnel at the WQL may increase to a maximum of 172 based on the requirement for additional laboratory procedures and on organizational changes that would involve the transfer of existing management and administrative staff from the LADWP headquarters building or other facilities in downtown Los Angeles. This increase in personnel from 102 to 172 may occur over a 10-year period. It is anticipated that the positions transferred from LADWP downtown facilities to the proposed WQL would be replaced at those downtown facilities with new hires in other disciplines. On weekends, the WQL would maintain operations with a skeleton crew.

To evaluate the project VMT, the net VMT was calculated by subtracting the VMT per employee for the Pasadena and Rinaldi facilities from the total VMT for the proposed WQL because the Pasadena and Rinaldi VMT represent the existing condition. The Pasadena facility is located at 555 E Walnut Street in Pasadena, and the Rinaldi facility is located at 15901 Rinaldi Street in Granada Hills. The VMT for employees that are expected to transfer to the proposed WQL from existing LADWP facilities in downtown Los Angeles were not subtracted from the total project VMT because it is anticipated that those positions would be backfilled at the current locations in the future, unlike the positions in the Pasadena and Rinaldi facilities.

The Pasadena facility is located within Traffic Analysis Zone 22121400 of the SCAG RTP Model. The VMT for this Traffic Analysis Zone is 16.3 miles per employee. The Rinaldi facility is included in the City of Los Angeles VMT Calculator, which shows a VMT of 14.1 miles per employee. The VMT for the project site is 12.4 miles per employee based on the VMT Calculator. The estimated VMT for the proposed WQL is presented in Table 3-13. As indicated, the net change in VMT is 1,051 miles, which results in a VMT of 6.11 miles per employee.

**Table 3-13: Estimated Project VMT per Employee**

| Parameter | Proposed WQL | Existing Pasadena Facility | Existing Rinaldi Facility | Net VMT Total |
|---|---|---|---|---|
| VMT per Employee | 12.4 | 16.3 | 14.1 | -- |
| Number of Employees | 172 | 62 | 5 | -- |
| Total VMT | 2,133 | -1,011 | -71 | 1,051 |
| | | | **Net VMT per Employee** | **6.11** |

Source: Translutions, 2022.

The project is located in the Central Area Planning Commission. The Central Area Planning Commission has a VMT Impact Criteria of 7.6 miles per employee, which, as established by LADOT, is 15 percent below the average for the Central Area Planning Commission. As the VMT associated with the proposed WQL would be below this threshold, the project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b), and the impact would be less than significant.

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

**No Impact.** The proposed project would include modifications to provide a westbound right-turn lane and an eastbound left-turn lane on Forest Lawn Drive at the site entrance opposite Mt. Sinai Drive. Modifications to the existing traffic signal at the intersection would also be required. During construction activities, temporary lane closures may be required to implement the intersection modifications. Potential conflicts associated with these lane closures would be addressed in the traffic control plan required by LADOT, which would include such measures as signage, flag persons, and lane detour plans as necessary to minimize disruptions to traffic. Construction related activities would be temporary and relatively short-term, and would not increase hazards due to a geometric design feature or incompatible uses. During project operation, the lane and traffic signal modifications would provide for safe ingress to and egress from the project site and reduce potential conflicts at the intersection on Forest Lawn Drive. All modifications would be completed in accordance with applicable regulations pertaining to roadway safety design. Therefore, operation of the project would not increase hazards due to a geometric design feature or incompatible use. No impact would occur.

**d) Would the project result in inadequate emergency access?**

**No Impact.** Required modifications to traffic lanes on Forest Lawn Drive would provide a westbound right-turn lane and an eastbound left-turn lane. These modifications would be accommodated within the existing road right-of-way. During construction for the intersection modification, temporary lane closures may be required but a traffic control plan would be required and approved by the LADOT. The traffic control plan would include measures such as signage, flag persons, and lane detour plans as necessary to minimize disruptions to traffic. Emergency access to the site and surrounding area, particularly for emergency response vehicles, would be maintained at all times. Operation of the proposed project would not inhibit emergency access to the project site. Secondary access for employee, service, and maintenance vehicles would be provided from Forest Lawn Drive at the west end of the HWSG. A series of interior roads would provide access for the public, employees, maintenance, and emergency vehicles to various locations within the site, as appropriate. Therefore, operation of the proposed project would not result in inadequate emergency access. No impact would occur.

## 3.18 Tribal Cultural Resources

| | Potentially Significant Impact | Less Than Significant Impact 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 section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: | | | | |
| i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or | ☐ | ☐ | ☐ | ☒ |
| ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | ☐ | ☒ | ☐ | ☐ |

### Discussion

The following analysis is based on information provided in the Cultural Resources Technical Memorandum prepared for the proposed project, which is included as Appendix C to this IS/MND. The identification of tribal cultural resources pursuant to Assembly Bill (AB) 52, which requires that a lead agency must consult with California Native American tribes who request formal consultation regarding potential impacts to tribal cultural resources, has been conducted by LADWP.

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

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

**No Impact.** As discussed in Section 3.5, Cultural Resources, based on archival research and field surveys of the project site, the proposed project would result in no impact to the one cultural resource (P-19-175297, Griffith Park) within the APE that is listed or eligible for listing in the CRHR or a local register. No tribal cultural resources, including sites, places, landscapes, or objects, were identified within the APE based on archival research, field surveys of the project site, and consultation with Native American tribal representatives pursuant to AB 52. Therefore, the proposed project would not result in a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in a state or local register of historical resources. No impact would occur.

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

**Less Than Significant Impact with Mitigation Incorporated.** A Native American Heritage Commission (NAHC) Sacred Lands File search conducted for the proposed project was determined to be positive; however, the sacred land designation relates to the general regional area including and surrounding the project site and does not necessarily equate to the existence of resources within the project site itself. The NAHC identified Native American tribal representatives who could potentially have specific and unreported knowledge of Native American cultural resources within the project site. In 2022, LADWP initiated tribal consultation with interested California Native American tribes consistent with Assembly Bill (AB) 52. As of the publication date of this IS/MND, LADWP has consulted with all tribes that requested consultation on the proposed project in accordance with AB 52. Specifically, LADWP consulted with two tribes, the Fernandeño Tataviam Band of Mission Indians and the Gabrielino Tongva Indians of California, beginning in April 2022. The Fernandeño Tataviam Band of Mission Indians did not have concerns regarding the proposed project. Although no known tribal cultural resources were identified within the project site based upon consultations, the Gabrielino Tongva Indians of California requested tribal monitoring for ground disturbing activities, which has been incorporated into Mitigation Measure TCR-1, discussed below.

Because no specific tribal cultural resources have been identified within the project site, including during AB 52 consultation, and based on archival research and field surveys of the project site, and because of previous substantial subsurface disturbance associated with past activities at the HWSG property, the potential for the existence of tribal cultural resources is considered low. However, because the site is located in a generally sensitive area adjacent to the Los Angeles River, during the construction of the proposed project, unknown subsurface archaeological resources, including tribal cultural resources, could potentially be encountered during ground-disturbing activities. Mitigation Measure TCR-1 would require LADWP to retain a tribal monitor to monitor all ground-disturbing activities in the project area in order to reduce impacts to a less than significant level.

As discussed in Section 3.5(b), in the event previously unknown archaeological resources are encountered during construction activities, the proposed project would be subject to California PRC Section 21083.2(i) regarding provisions related to the inadvertent discovery of archaeological resources. Work shall be temporarily halted in the vicinity of the find, and LADWP shall retain a qualified professional archaeologist meeting the Secretary of the Interior Professional Qualifications Standards for archaeology to evaluate the significance of the find and determine appropriate treatment for the resource in accordance with provisions of CEQA Guidelines Section 15064.5, the National Historic Preservation Act, 36 CFR Section 800.6 (Resolution of adverse effects), and Section 800.13 (Post-review discoveries). With compliance with California PRC Section 21083.2(i) and implementation of Mitigation Measure TCR-1, as well as implementation of BMP-2 (cultural resources awareness training), as outlined in Section 3.5(b) of this IS/MND, impacts to tribal cultural resources would be less than significant.

### *Mitigation Measure*

**TCR-1** LADWP shall retain a tribal monitor prior to the commencement of ground-disturbing activities at the project site. The tribal monitor shall be retained from a consulting tribe that is ancestrally affiliated with the project area and qualified by their tribe to monitor tribal cultural resources. The tribal monitor will be present on-site during ground-disturbing activities during project construction. "Ground-disturbing activity" shall include demolition, pavement removal, potholing, auguring, grubbing, boring, grading, excavation, drilling, and trenching. Monitoring needs shall be routinely evaluated throughout ground disturbance activities to determine whether additional monitoring is warranted; for instance, the monitoring program may be concluded if previous site fill material is determined to have come from an imported source, monitoring efforts have not yielded finds, or mutual consensus is reached between LADWP and consulting tribes to conclude the program.

Before initial ground-disturbing activities, and any time new personnel is hired at the project site, the tribal monitor shall conduct a brief awareness training session for the benefit of all construction workers, supervisory personnel, and/or the new hire. The training, which could be held in conjunction with the project's initial on-site safety meeting, shall explain the importance of, and legal basis for, the protection of significant tribal cultural resources. Each worker shall be notified of the proper procedures to follow in the event that tribal cultural resources or human remains are uncovered during ground-disturbing activities.

The tribal monitor shall complete daily monitoring logs that will be provided to LADWP and held in confidentiality; however, the logs shall be made available for inspection by all consulting tribes.

In the event that previously unknown resources are encountered during construction activities, the proposed project shall be subject to California PRC Section 21083.2(i) regarding provisions related to the accidental discovery of archaeological resources. Work shall be temporarily halted in the vicinity of the find, and LADWP shall retain a qualified professional archaeologist meeting the Secretary of the Interior Professional Qualifications Standards for archaeology to evaluate the significance of the find and determine appropriate treatment for the resource in accordance with provisions of CEQA Guidelines Section 15064.5, the National Historic Preservation Act, 36 CFR Section 800.6 (Resolution of adverse effects), and Section 800.13 (Post-review discoveries). Upon discovery of any archaeological resources, construction activities in the immediate vicinity of the find (i.e., not less than the surrounding 60 feet) shall cease until the find can be assessed. All archaeological resources unearthed by project construction activities shall be evaluated by a qualified archaeologist and the on-site tribal monitor. If the resources are determined to be Native American in origin, all consulting tribes shall be notified and be provided information regarding the nature of the find, and interested tribes shall coordinate with LADWP regarding significance, treatment, and final disposition of these resources.

The input of all consulting tribes shall be taken into account in the preparation of any required treatment plan for the resources. Work in the area of the discovery may not resume until evaluation and treatment of the resource is completed and/or the resource is recovered and removed from the site. Construction activities may continue on other parts of the construction site while evaluation and treatment of the resource takes place.

## 3.19 Utilities and Service Systems

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| *Would the project:* | | | | |
| a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? | ☐ | ☐ | ☒ | ☐ |
| b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? | ☐ | ☐ | ☒ | ☐ |
| c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | ☐ | ☐ | ☒ | ☐ |
| d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? | ☐ | ☐ | ☒ | ☐ |
| e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? | ☐ | ☐ | ☒ | ☐ |

### Discussion

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

**Less Than Significant Impact.** The proposed project would require new infrastructure within the HWSG property to provide water (including potable and recycled water), electrical, gas, and telecommunication services. These services would connect to existing infrastructure supply lines within Forest Lawn Drive, including potable and recycled water, gas, and telecommunications lines. The proposed project components do not represent unusual land uses that would require substantial demand for utilities. Thus, the capacity of these existing supply lines is anticipated to be sufficient to provide service to the proposed project, and the project connections would not be expected to create significant impacts. Sanitary wastewater from the project, which is anticipated to be relatively low in volume, would be handled through a connection to the existing sewer line that is located parallel to Forest Lawn Drive at the eastern end of the HWSG property and is routed to LAGWRP. This line would have sufficient capacity to accommodate the project's sanitary wastewater needs, and no additional treatment capacity at LAGWRP would be required. Similar to existing conditions, excess storm flows from the project site would be diverted to the Los Angeles River via storm drain inlets located in the eastern end of the HWSG property. As previously discussed, the project would comply with the City's LID ordinance to reduce the volume of and capture stormwater flows such that they would not exceed the capacity of the existing

stormwater drainage system. Therefore, the project would not require or result in the relocation or construction of new or expanded infrastructure that would cause significant environmental effects. The impact would be less than significant.

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

**Less Than Significant Impact.** Construction activities are anticipated to occur over an approximate 7-year period and would require water for activities such as dust control and concrete. However, these activities are limited and temporary in nature, and would not require large amounts of water. Therefore, impacts to water supply during project construction would be less than significant.

Potable water would be required for various purposes at the proposed WQL, DPR Demonstration Facility, and Headworks Restoration Park. High water demand is typically associated with residential developments and various industrial uses. The proposed project would not include land uses that require substantial water supply. Additionally, the proposed project would incorporate water demand reduction features into the project design. The proposed WQL would include an internal landscaped courtyard, and may include a green roof, to conserve water through stormwater capture and treatment. Recycled water from LAGWRP would provide irrigation water for landscaping throughout the project site, which would be drought-tolerant in the types and use of plant material. As such, sufficient water supplies would be available to serve the proposed project and reasonably foreseeable future development during normal, dry, and multiple dry years. The impact related to water supply would be less than significant during project operation.

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

**Less Than Significant Impact.** As discussed in Section 3.19(a), sanitary wastewater from the proposed project, which is anticipated to be relatively low in volume, would be routed to LAGWRP. As discussed in Section 3.10(a), in addition to sanitary wastewater, an average of approximately 0.21 MGD discharged from the AWPF of the proposed DPR Demonstration Facility would be routed to LAGWRP for processing. LAGWRP has a treatment capacity of approximately 20 MGD and currently treats an average of approximately 16 MGD. Therefore, there would be adequate capacity to serve the project's demand, and the impact would be less than significant.

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

**Less Than Significant Impact.** During project construction, attempts would be made to balance cut and fill material on site. However, some material excavated during foundation construction for the WQL and DPR Demonstration Facility may need be hauled to a local landfill authorized to accept such material, which is not expected to be hazardous. Additionally, the proposed project would incorporate source reduction techniques and recycling measures in accordance with the Citywide Construction and Demolition Debris Recycling Ordinance, which would reduce the amount of construction-generated solid waste that would require disposal in the landfill. Thus, the amount of solid waste generated during construction of the proposed project would be minimized.

Construction impacts related to landfill capacity and solid waste reduction goals would be less than significant.

The implementation of the proposed project is anticipated to result in an increase in visitors to the project site. As such, the operation of the proposed project would result in an increase in solid waste generation over existing conditions. This waste is not expected to be hazardous, and the proposed project uses are not anticipated to generate large volumes of solid waste. Therefore, it is anticipated that area landfills have sufficient remaining capacity to accommodate operation of the proposed project. The impact would be less than significant.

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

**Less Than Significant Impact.** As previously discussed, the construction waste generated by the proposed project would be properly disposed of in existing solid waste facilities. Construction materials and excavated soils would be disposed in accordance with federal, state, and local statutes and regulations. Construction and operation of the proposed project would occur in compliance with the City's Construction and Demolition Ordinance with the County-wide Integrated Waste Management Plan. The impact would be less than significant.

## 3.20 Wildfire

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

### Discussion

**a) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?**

**No Impact.** The far eastern portion of the HWSG site is located within a designated VHFHSZ.[41] The components of the proposed project (WQL, DPR Demonstration Facility, and Headworks Restoration Park) would not be constructed within the VHFHSZ. Under the proposed project, this area would remain similar to existing conditions with no additional structures. In this portion of the HWSG, which includes the eastern portion of the Headworks East Reservoir, low-growing scrub vegetation has reestablished, and the top of the East Reservoir itself has been covered with soil and planted with low-growing scrub vegetation. The City of Los Angeles Emergency Management Department coordinates evacuations in the case of emergency with LAPD and LAFD, as outlined in the City's Emergency Operations Plan.[42] The County of Los Angeles designates disaster routes within the County, including within the City. Within the proposed project area, SR-134 is a designated freeway disaster route.[43]

Required modifications to traffic lanes on Forest Lawn Drive would provide a westbound right-turn lane and an eastbound left-turn pocket. These modifications would be accommodated within the existing road right-of-way. Modifications to the existing traffic signal at the intersection would also be required. During construction for the intersection modification, temporary lane closures may

41 California Department of Forestry and Fire Protection (CAL FIRE). FHSZ Viewer. Available at: https://egis.fire.ca.gov/FHSZ/. Accessed January 19, 2024.

42 City of Los Angeles, Emergency Management Department. 2022. City of Los Angeles Emergency Operations Plan. Available at: https://emergency.lacity.org/emergency-plans-and-annexes. Accessed January 19, 2024.

43 Los Angeles County Department of Public Works. Disaster Route Maps: City of Los Angeles Central Area. Available at: http://dpw.lacounty.gov/dsg/disasterRoutes/map/Los%20Angeles%20Central%20Area.pdf. Accessed January 19, 2024.

be required but a traffic control plan would be required and approved by the LADOT. The traffic control plan would include measures such as signage, flag persons, and lane detour plans as necessary to minimize disruptions to traffic. Emergency access to the site and surrounding area, particularly for emergency response vehicles, would be maintained at all times. Except for these intersection modifications, all construction would occur within the HWSG site. No impacts to SR-134, the designated freeway disaster route, would occur.

Operation of the proposed project would not alter the adjacent street system such that the City's adopted emergency response plan or emergency evacuation plan would be impacted. Secondary access for employee, service, and maintenance vehicles would be provided from Forest Lawn Drive at the west end of the HWSG. A series of interior roads would provide access for the public, employees, maintenance, and emergency vehicles to various locations within the site as appropriate. Therefore, no impacts related to substantially impairing an adopted emergency response plan or emergency evacuation plan would occur.

**b) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?**

**Less Than Significant Impact.** The far eastern portion of the HWSG is within a designated VHFHSZ. The HWSG is primarily flat and undeveloped, and the eastern portion of the property is characterized by low-growing scrub vegetation. In addition, the surrounding urban uses, including Forest Lawn Memorial Park and Mount Sinai Memorial Park to the south and the Los Angeles River and SR-134 to the north, limits the risk of spread of wildfire. The portion of the HWSG property located in the designated VHFHSZ would remain unchanged under the proposed project and would not exacerbate wildfire risk. In other areas of the HWSG property, the construction for the proposed WQL and DPR Demonstration Facility would require the use of flammable materials or construction equipment that may spark. LADWP would comply with the provisions of the Municipal Code regarding fire protection and prevention. The impact would be less than significant.

During operation of the proposed project, the Headworks Restoration Park would be open to the public for passive recreation users. Although the Headworks Restoration Park could draw users to the HWSG property where it was previously publicly inaccessible, passive use of the park would not exacerbate wildfire risks. Additionally, as the Headworks Restoration Park is located in an area with existing trails and other passive recreation uses, the risk of exposing project occupants (i.e., passive recreation users) to pollutant concentrations from wildfire is similar to existing conditions.

It is anticipated that the proposed WQL would require a maximum of 172 people over the next decade. Additionally, it is anticipated that groups of up to 20 people from outside organizations, other government agencies, or the general public may visit the WQL about twice every month on average. A total of approximately five personnel would be present on weekdays at the proposed DPR Demonstration Facility. While the proposed project would introduce workers and the public to the HWSG property, the proposed WQL and DPR Demonstration Facility would be constructed in conformance with the latest Los Angeles Fire Code standards, which includes requirements and standards for new building construction as well as for building occupancy. With conformance to existing regulations, the proposed WQL and DPR Demonstration Facility would not exacerbate wildfire risk. Therefore, impacts would be less than significant.

**c) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**

**Less Than Significant Impact.** As discussed previously, the portion of the HWSG property located in the designated VHFHSZ would remain unchanged under the proposed project. In other areas of the HWSG property, the proposed WQL and DPR Demonstration Facility would require the installation of roads interior to the site and underground utilities infrastructure that would connect to existing utilities infrastructure. The proposed project would not include any fuel breaks, emergency water sources, or new power lines, and the impact would be less than significant.

**d) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

**No Impact.** The HWSG site is not located in a landslide area or adjacent to hillside areas that would be subject to instability or increased runoff as result of a wildfire. Therefore, no impact would occur.

## 3.21 Mandatory Findings of Significance

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | ☐ | ☒ | ☐ | ☐ |
| 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)? | ☐ | ☒ | ☐ | ☐ |
| c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | ☐ | ☒ | ☐ | ☐ |

### Discussion

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

**Less Than Significant Impact With Mitigation Incorporated.** As described in Section 3.4, Biological Resources, no special-status plant or wildlife species are anticipated to occur within or close to the project site. Nesting birds and roosting bats in trees along the perimeter of the HWSG property adjacent to Forest Lawn Drive would have the potential to be disturbed by construction activities. However, as required under the MBTA and the CFGC, nesting birds would be protected via implementation of BMP-1. Additionally, mitigation measure BIO-1 would avoid potential impact to roosting bats during construction activities. A limited number of individual trees and shrubs protected under the City's Native Tree Protection Ordinance may be impacted at the primary entry driveway at Mt. Sinai Drive and south of the proposed DPR Demonstration Facility. Impacts to any protected species would be determined during final design. However, a Tree Removal Permit in compliance with the City's Native Tree Protection Ordinance would be required for any removal or pruning of protected species. With issuance of a tree removal permit from Public Works and implementation of compensation for tree removals pursuant to the permit, the project would be in compliance with the Native Tree Protection Ordinance, and impacts to ordinance-protected species would be less than significant. Therefore, the Proposed Project would not have the potential to 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, or reduce the number or restrict the range of a rare or endangered plant or animal. Impacts would be less than significant.

As described in Section 3.5, Cultural Resources, the project site does not support any important examples of major periods in California history. While there are no known important examples of California prehistory on the project site, there is the potential for previously unknown archaeological resources to be encountered during ground-disturbing activities associated with construction of the project. BMP-2 would be implemented to provide cultural resources awareness training to construction personnel. Additionally, if archaeological material is uncovered during ground-disturbing activities, in accordance with California PRC Section 21083.2(i) regarding provisions related to the accidental discovery of archaeological resources, work would be temporarily halted in the vicinity of the find and the LADWP shall retain a qualified professional archaeologist meeting the Secretary of the Interior's Standards for archaeology to evaluate the significance of the find and determine appropriate treatment for the resource in accordance with exiting requirements. As discussed in Section 3.18, based on the results of AB 52 consultation that LADWP has conducted with interested local tribal representatives, tribal cultural resources, although not known to exist within the project site, could lie beneath the surface and may be inadvertently discovered during ground-disturbing construction activities. Because the potential to encounter tribal cultural resources exists, mitigation measure TCR-1 (related to the inadvertent discovery, evaluation, and treatment of tribal cultural resources) would be implemented. This measure includes, as necessary, the procurement of a tribal monitor from a consulting Native American tribe to monitor the ground-disturbing activities. With compliance with existing requirements, implementation of mitigation measure TCR-1, and incorporation of BMP-2 regarding cultural resources awareness training as outlined in Section 3.5(b), impacts to archaeological and tribal cultural resources would be less than significant with mitigation incorporated.

**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)?**

**Less Than Significant Impact with Mitigation Incorporated.** A significant environmental impact could result from the combined effects of two or more projects that are closely related geographically (i.e., within the same vicinity or greater region, depending on the nature and scope of the project and environmental factor under consideration) and in time (i.e., recently completed projects, projects currently under construction, and/or projects anticipated to be implemented in the near-term future). In general, the effects of a proposed project when combined with the effects of past projects (other than recently completed projects) are accounted for in the baseline conditions under CEQA for the analysis of the proposed project's environmental impacts.

The analysis of the combined impacts of more than one project allows decision makers to consider the potential consequences of a project in a broader environmental context rather than in isolation. This is necessary because a significant combined impact could result even when the individual impacts of related projects are less than significant. The combined effects of several related projects with impacts that are less than significant may also be determined to be less than significant on a cumulative basis. In addition, even if the combined effects of several related projects are determined to be significant, an individual project's incremental contribution to those significant combined effects may be determined to be less than cumulatively considerable and therefore less than significant.

The entire HWSG property has been highly disturbed starting early in the 20$^{th}$ century with the installation of water extraction and conveyance facilities involving deep excavation and grading, the mid-century development of spreading grounds requiring extensive earth movement across

the site, and the recent implementation of the Headworks Water Complex, which entailed the construction of large, partially buried structures that encompass the eastern half of the property. Because the project is a public utilities function located within existing property historically controlled and used by a public utility, it would not generally represent a substantial change in the existing environment such that it would make a cumulatively considerable contribution to a significant impact when considered in combination with impacts from closely related projects. Specific environmental factors addressed throughout this IS/MND are discussed in greater detail below with respect to cumulative impacts.

As shown in the environmental analysis in this IS/MND, the proposed project was determined to have no impact related to agriculture and forestry resources, land use and planning, mineral resources, population and housing, and public services. Because the project would have no impact in relation to these factors, it would not have the potential to contribute to a significant effect created by the combined impacts of closely related projects.

Impacts for all other environmental factors considered in this IS/MND were determined to be less than significant without the need for mitigation measures, except for impacts related to potential disturbance of roosting bats, noise created by construction activity, and tribal cultural resources not currently listed or identified as eligible for listing in the CRHR, which were determined to be less than significant with the incorporation of mitigation measures.

Impacts to aesthetic resources, including the removal of a limited number of trees adjacent to Forest Lawn Drive (a City-designated scenic highway) and the introduction of new sources of light or glare were determined to be less than significant. These impacts would be isolated to the immediate area of the proposed project, and there are no known other related projects in the immediate area. Therefore, there would be no potential for the project to make a make a cumulatively considerable contribution to a wider significant impact to aesthetic resources.

Air pollutant and GHG emissions, as assessed under CEQA, are inherently recognized as cumulative impacts. Project-level thresholds of significance for these emissions are used in the determination of whether a project's individual emissions would make a cumulatively considerable contribution to a significant impact. Based on the analysis contained in this IS/MND, both air quality and GHG emissions would remain below the defined thresholds of significance. Therefore, the proposed project would not make a cumulatively considerable contribution to a wider adverse air quality or GHG impact.

The use of energy is likewise considered an impact with broader effects based on the potential consumption of limited energy resources. However, it was determined in this IS/MND that project energy consumption during construction would be relatively minor, would not be wasteful, and would be temporary in nature. During operation, the WQL would be LEED Gold certified, with the objective to achieve LEED Platinum certification and Envision Sustainable Infrastructure certification. This would represent an energy savings over the operation of the existing Pasadena WQL, which is housed in a building constructed in the 1960s. In addition, the DPR Demonstration Facility would help prove technologies that would eventually allow for the reuse of locally generated wastewater, thus limiting the use of imported water, which consumes the majority of the energy used by the water sector in the state. Therefore, the project would not make a cumulatively considerable contribution to a wider adverse impact related to energy consumption and conservation.

Potential impacts to certain resources, including biological resources (nesting birds and roosting bats) and the inadvertent discovery of unknown buried archaeological, paleontological, or tribal

cultural resources, and human remains were determined in this IS/MND to be less than significant through compliance with existing policies or regulations, with the implementation of applicable BMPs established as part of the proposed project, or with the implementation of mitigation measures introduced based on the results of the environmental analysis contained in the IS/MND. However, such impacts, should they occur, are site-specific in nature, are limited to the project construction footprint, and therefore would not make a cumulatively considerable contribution to similar potentially adverse impacts resulting from other closely related projects in the vicinity.

Geology and hydrology impacts related to increased potential for erosion, runoff, siltation, flooding, and pollution discharges would also generally be site-specific in nature, but such impacts could also extend off site and result in a larger impact when combined with similar impacts from closely related projects in the area. However, given the nature of the proposed project and the existing setting and through compliance with existing policies or regulations (NPDES Permit, SWPPP, and LID ordinance), off site impacts would be largely eliminated and therefore would not make a cumulatively considerable contribution to a more widespread impact potentially created by the combined effects of closely related projects.

Geology impacts related to seismic hazards and hazards created by various soil conditions pertain to the potential impacts from the environment on the proposed project rather than impacts to the environment caused by the project. In this regard the project would not make a cumulatively considerable contribution to similar impacts experienced by closely related projects in the area.

Impacts related to noise have the potential to affect a limited area beyond the boundaries of HWSG. However, the assessment of such impacts in this IS/MND and the conclusion of a less than significant impact with mitigation incorporated accounted for the combined effect of the project and the surrounding existing setting. These noise impacts would be temporary, related only to project construction activities. Furthermore, no major projects that would contribute to a significant combined impact related to noise have been identified in the vicinity of the proposed project.[44]

The WQL and DPR Demonstration Facility would require limited use of some potentially hazardous materials during operation. These materials would be contained and confined to the facilities or in transport vehicles traveling to and from the property. Compliance with required state and federal laws as well as safeguards incorporated into the project to monitor for, limit, and contain accidental releases would minimize the potential for hazardous materials to be released from the facilities. As such, hazardous materials associated with the project are not anticipated to combine with those used for other development projects in the area to create a cumulatively considerable effect.

As discussed in Section 3.10(a), the operation of the DPR Demonstration Facility would result in the potential diversion of 0.04 MGD of recycled water effluent from the LAGWRP that may have been otherwise discharged to the Los Angeles River. This reduction in discharge of 0.04 MGD to the Los Angeles River downstream of LAGWRP would represent a decrease in flow of approximately 0.06 cfs, resulting in a reduction in depth of approximately 0.1 millimeter or less, depending on the location in the river. This would be an essentially immeasurable change and is, therefore, considered de minimis. Therefore, because of the de minimis nature of this change, the project would make a less than cumulatively considerable contribution to any reduction in

[44] City of Los Angeles, Department of City Planning. n.d. Major Projects. https://ladcp.maps.arcgis.com/apps/MapJournal/index.html?appid=b06f97ccf94741fdaad27443013eead1. Accessed January 19, 2024.

flows to the river potentially caused by other related projects.

Although determined to be less than significant, impacts related to VMT could be cumulatively considerable when combined with impacts from other development projects in the area. According to the LADOT Guidelines, related projects considered in the cumulative analysis for VMT would be those located within 0.5-mile of the project site. There are currently no know development projects within 0.5-mile of the project site that would contribute to a significant combined impact related to VMT. In addition, according to the LADOT Guidelines, long-term cumulative impacts related to VMT could occur if the project was determined to be inconsistent with the planning assumptions and strategies contained in the SCAG RTP/SCS. As discussed in Section 3.3(a), the proposed project would be consistent with the RTP/SCS, and, therefore, it would have a less than significant long-term cumulative impact on VMT.

Impacts to utilities and service systems could contribute to a significant impact from the combined effects of more than one project on the limited capacity of services such as wastewater treatment, water supply, and solid waste disposal. The project would require relatively minor work to connect to existing water and electrical supplies, and would not require a new water supply, or an expansion of supply lines or in the capacity of water or wastewater treatment facilities. The project would comply with the City's LID ordinance to reduce the volume of and capture stormwater flows such that they would not exceed the capacity of the existing stormwater drainage system. The project would generate solid waste in the form of excavated material during construction. However, this would be temporary and would represent a very small volume both in terms of daily throughput and current remaining capacity of area landfills. Therefore, the project would represent a less than cumulatively considerable incremental contribution to any combined effect on utilities and service systems potentially created by other related projects.

The proposed project would create less than significant impacts related to wildfire, including to the exposure of people to the uncontrolled spread of wildfire, wildfire-created pollutants, and wildfire-associated flooding or landslides and the installation of wildfire-related infrastructure improvements. However, given the character of HWSG, including flat terrain, relative absence of fire-prone vegetation, and the surrounding uses, including Forest Lawn Memorial Park and Mount Sinai Memorial Park to the south and the Los Angeles River and SR-134 to the north, the proposed project would not exacerbate the ignition or uncontrolled spread of wildfire and would, therefore, not make a cumulatively considerable contribute to a potential combined effect of closely related projects.

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

**Less Than Significant Impact with Mitigation Incorporated.** Numerous factors discussed in the environmental impact analyses presented throughout Chapter 3 pertain to the quality of the human environment. Based on the analysis contained in the IS/MND, the environmental impacts created by the proposed project in relation to most of these factors would be absent or less than significant. However, as discussed in Section 3.8(a), project construction activities could generate a temporary increase in ambient noise levels in excess of applicable standards established in the local ordinances. Therefore, mitigation measures NOI-1 through NOI-5 would be required. With the incorporation of these mitigation measures, the project would not have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly. Impacts would be less than significant with mitigation incorporated.

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