INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

VALLEY GENERATING STATION DEMOLITION PROJECT (UNITS 1–4 AND ASSOCIATED STRUCTURES)

PREPARED BY

Los Angeles Department of Water & Power

Environmental Affairs

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ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
AB	Assembly Bill
AQMP	Air Quality Management Plan
AST	aboveground storage tank
BGS	below ground surface
BMP	best management practice
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Services
CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CH_4	methane
City	City of Los Angeles
CMA	Critical Movement Analysis
CO	carbon monoxide
CO_2	carbon dioxide
Community Plan	Sun Valley-La Tuna Canyon Community Plan
Community Plan Area	Sun Valley-La Tuna Canyon Community Plan Area
County	County of Los Angeles
dBA	A-weighted decibel
DTSC	Department of Toxic Substances Control
EDR	Environmental Data Resources
EIR	environmental impact report
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agenc
FHSZ	fire hazard severity zone
FHWA	Federal Highway Administration
FTBMI	Fernandeño Tatavium Band of Mission Indians
GHG	greenhouse gas
GWP	global warming potential
HCM	Highway Capacity Manual
HFC	hydrofluorocarbon
HWMP	hazardous waste management plan

Acronym/Abbreviation	Definition
I	Interstate
IS	initial study
kWh	kilowatt-hours
LA Metro	Los Angeles County Metropolitan Transportation Authority
LADOT	Los Angeles Department of Transportation
LADWP	Los Angeles Department of Water and Power
L_{eq}	equivalent continuous sound level
LOS	level of service
LST	localized significance threshold
MLD	most likely descendant
MM	mitigation measure
MND	mitigated negative declaration
MOE	measure of effectiveness
MRZ	Mineral Resource Zone
MS4	Municipal Separate Storm Sewer System
MT CO2e	metric tons of carbon dioxide equivalent
MW	megawatt
N2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NF3	nitrogen trifluoride
NO2	nitrogen dioxide
NOx	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
O3	ozone
PCB	polychlorinated biphenyl
PDF	project design feature
PFC	perfluorocarbon
PM10	particulate matter with an aerodynamic diameter less than or equal to 10 microns
PM2.5	particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
RCNM	Roadway Construction Noise Model
RO	reverse osmosis
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin

Acronym/Abbreviation	Definition
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCS	Sustainable Communities Strategy
SF6	sulfur hexafluoride
SLF	Sacred Lands File
SLTRP	Strategic Long-Term Resource Plan
SO2	sulfur dioxide
SoCalGas	Southern California Gas Company
SOx	sulfur oxides
SR	State Route
SVOC	semi-volatile organic compound
SVP	Society of Vertebrate Paleontology
SWPPP	stormwater pollution prevention plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TCR	tribal cultural resources
TPH	total petroleum hydrocarbon
USEPA	U.S. Environmental Protection Agency
USGS	U.S. Geological Survey
UST	underground storage tank
V/C	volume to capacity
VGS	Valley Generating Station
VMT	vehicle miles traveled
VOC	volatile organic compound

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1 INTRODUCTION

1.1 Project Overview

The Los Angeles Department of Water and Power (LADWP) proposes to demolish Units 1–4 and associated structures and systems, the bearing cooling tower foundation, skim pond, and four concrete foundations of demolished cooling towers within the Valley Generating Station (VGS) (project or proposed project). The associated structures and systems adjacent to Units 1–4 that would also be demolished include the external connected turbine deck, circulating water piping connections, the oil water separator, the Fifth Street pipe trench, and the weld shop. The A/B Basins would remain in service, and the reverse osmosis (RO) trailer would not be demolished but would be removed from its current location. Units 1–4 were decommissioned in 2002, and the four cooling towers were demolished in 2017. These areas within the VGS property have been identified as available land for installation of a future renewable energy project to help LADWP meet Senate Bill (SB) 350 requirements and greenhouse gas (GHG) reduction goals. However, the need, timing, and nature of any future projects at VGS is currently unknown, and if such projects are proposed in the future, they would be subject to additional environmental assessment prior to any approvals or implementation.

1.2 California Environmental Quality Act

The California Environmental Quality Act (CEQA) (California PRC, Section 21000 et seq.) is the main statutory basis for the environmental review of projects in California. CEQA emphasizes the need for public disclosure and identifying and mitigating any environmental impacts associated with proposed projects. Unless a project falls within exemptions set forth in CEQA or the CEQA Guidelines (14 CCR 15000 et seq.), it requires at least some level of environmental review under CEQA. The proposed project does not fall within any exemptions set forth in CEQA or the CEQA Guidelines.

As the lead agency, LADWP prepared an initial study (IS) in accordance with the CEQA Guidelines, to evaluate potential environmental effects and to determine whether an environmental impact report (EIR), a negative declaration, or a mitigated negative declaration (MND) should be prepared for the proposed project. Per Section 15070(b) of the CEQA Guidelines, an MND is prepared for a project when an IS has identified potentially significant effects on the environment, but (1) revisions in the project plans or proposals made by, or agreed to by, the applicant before the proposed MND is released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur and (2) there is no substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment.

The IS determined that the implementation of the proposed project could cause some potentially significant impacts on the environment, but as shown in the environmental analysis contained in this MND, all of the proposed project's potentially significant impacts would be reduced to less-than-significant levels through the implementation of mitigation measures. Consequently, the analysis contained herein concludes that an MND shall be prepared for the proposed project.

The environmental documentation and supporting analysis is subject to a public review period. Therefore, the document will be submitted to the State Clearinghouse for review, and the review period is determined to be 30 days in accordance with Section 15073 of the CEQA Guidelines. Following review of any comments received, LADWP will consider these comments as a part of the proposed project's environmental review and include them with this MND for consideration by LADWP in accordance with Section 15074(b) of the CEQA Guidelines.

1.3 Project Location

Proposed Project Site

The project site is located within the VGS in the City of Los Angeles (City) in the San Fernando Valley region of the County of Los Angeles (County). Generally, the VGS is in the northeastern portion of the City in the Sun Valley neighborhood, approximately 1 mile northeast of the Interstate (I) 5 and State Route (SR) 170 intersection. Access to the VGS is provided from Sheldon Street, which forms the southern site boundary. Old San Fernando Road has secondary access driveways into the VGS and forms the western site boundary. The VGS is surrounded by the County's Department of Public Works Hansen Spreading Grounds Facility to the north; auto-dismantling shops and manufacturing uses to the south and east; the Bradley Landfill and Recycling Center to the south; and hospital, commercial, and residential uses to the west (Figure 1, Project Location). Surrounding land uses are described in detail below.

Specifically, the VGS is located at 11801 Sheldon Street. The project site consists of VGS Units 1–4 and related structures and systems in the central portion of VGS, the bearing cooling tower foundation and skim pond north of the units, and four foundations of demolished cooling towers east of the units (Figure 2, Demolition Areas). As shown in Figure 2, the related structures and systems located near Units 1–4 that would also be demolished include the external connected turbine deck, circulating water piping connections, the oil water separator, the Fifth Street pipe trench, and the weld shop. The A/B Basins would remain in service, and the RO trailer would not be demolished but would be removed from its current location.

SOURCE: Bing Maps 2018, Los Angeles County 2011

Los Angeles Department of Water & Power

FIGURE 1

Project Location

Valley Generating Station

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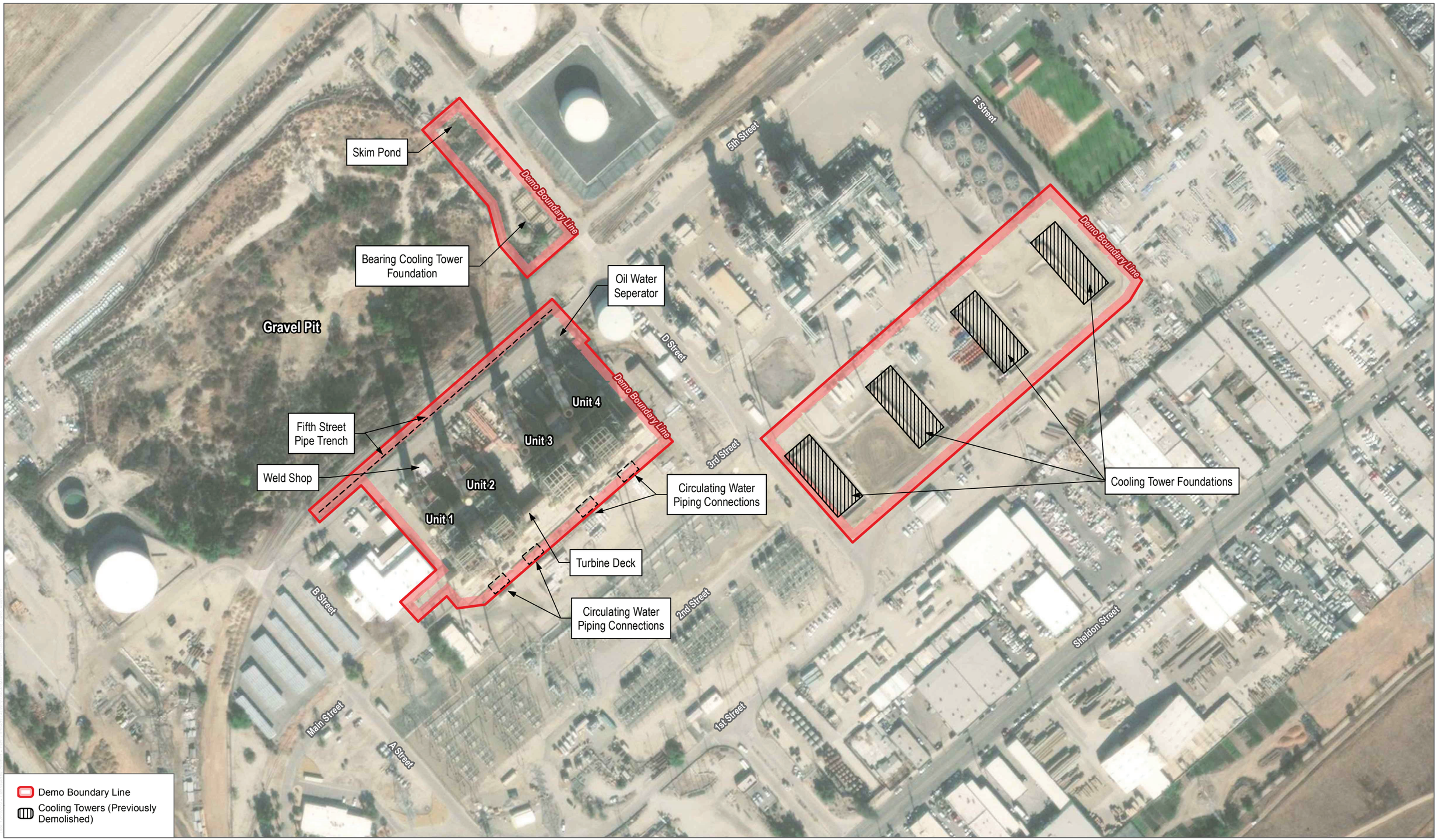

SOURCE: Digital Globe 2017

LA DWP Los Angeles Department of Water & Power

0 100 200 Feet

FIGURE 2

Demolition Areas

Valley Generating Station

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Existing Conditions

Los Angeles Department of Water and Power Energy Production Facilities

LADWP's power system is the nation's largest municipal electricity utility and serves a 465-square-mile area in Los Angeles and much of the Owens Valley. LADWP's power system supplies more than 26 million megawatt (MW) hours of electricity a year for the City's 1.4 million residents, and has over 7,800 MW of generation capacity. For power generation, LADWP operates 4 in-basin thermal plants, 1 out-of-basin thermal plant, 14 small hydroelectric plants, 1 large hydroelectric plant, 1 wind plant, and 2 solar photovoltaic plants. LADWP is the sole owner and operator of the four electric generation stations in the Los Angeles Basin, known as "in-basin stations." These include Haynes Generating Station in Long Beach, Harbor Generating Station in Wilmington, Scattergood Generating Station in Playa del Rey, and the VGS in Sun Valley. Each station consists of multiple generating units ranging in size between 43 MW and 250 MW, and utilize natural gas as a fuel source (LADWP 2017).

Valley Generating Station

Construction of the VGS began in 1951 with Units 1 and 2 to meet the City's growing demand for power. Units 3 and 4 were permitted and constructed over the following years, and Units 1–4 were all producing power by 1956. As part of LADWP's commitment to increase energy efficiency and reliability, the VGS began its repowering project in 2001 for clean, fuel-efficient energy through combined cycle technology. Repowering was completed in 2004 with the installation of a simple-cycle, approximately 43 MW gas-turbine generator (Unit 5) and a combined-cycle generating unit (Units 6, 7, and 8) consisting of two gas turbines with heat recovery steam generators, which supplies one steam turbine with a combined total plant net maximum capacity of approximately 576 MW. The total net dependable capacity for the VGS is approximately 530 MW (LADWP 2020).

VGS Units 1–4 were decommissioned in the early 2000s after the commission of simple cycle Unit 5, and combined cycled Units 6, 7, and 8, all of which are situated northeast of Units 1–4. Units 1–4 were designed with gas-fired or fuel oil-fired conventional steam-generating boilers and with a closed-loop condenser cooling water system. Each unit has an associated exhaust stack that stands approximately 250 feet tall. The primary structures of Units 1 and 2 are approximately 125 feet tall, and Units 3 and 4 are approximately 150 feet tall (LADWP 1951, 1953, 1954). The cooling towers associated with Units 1 and 2 were demolished in 2000 as part of the Repower Project. Four additional cooling towers for Units 3 and 4 were demolished in 2017. The remaining cooling tower foundations are located east of Units 1–4. Large storage tanks are located north of Units 1–4, including the Hansen Reclamation Tank, which primarily stores reclaimed water used in the service water system, and the Distillate Tank, which stores diesel fuel for use in combustion turbines. The original six fuel oil storage tanks, located northeast of Units 1–4, were demolished in batches, two in 2004, which were replaced with the Distillate and Hansen Tanks in 2005, and the remaining four tanks in 2016 and 2017 (Treinen 2019).

The systems and equipment associated with Units 1–4, which will be demolished along with the units, include (1) boiler plant equipment, which includes the boiler feed system, boiler and equipment, boiler water make-up system, draft equipment, instruments and controls, and fuel oil and gas system; (2) turbine-generator units, which consist of the circulating water system,

cooling towers, condensers, main turbine, turbine instruments and control, and lubricating oil purification system; (3) miscellaneous power plant equipment, which includes the compressed air system, crane and locomotive, oil-water separators, deep well pumping units, and fire protection system; and (4) electrical equipment such as the main generators, power transformers, main switch gear, auxiliary switch gear, and miscellaneous electrical equipment.

Surrounding Land Uses

The project site is located within the VGS in the Sun Valley neighborhood within the City of Los Angeles. Land uses near the VGS include residential, commercial, medical, industrial, manufacturing, and auto-related uses. The project site is contained within the central and southeastern portions of the VGS and, thus, is primarily surrounded by other components of the VGS property. The following sections further detail the land uses surrounding the project site.

North: The northern portion of the VGS contains a gravel pit northwest of Units 1–4, two existing and four demolished storage tanks north of Units 1–4, and the Truesdale Training Center to the northeast of Units 1–4, which consists of LADWP training grounds and facilities. A concrete-lined drainage channel forms the northern VGS property boundary, beyond which is the County's Department of Public Works Hansen Spreading Grounds Facility. The Hansen Spreading Grounds Facility is a shallow basin that allows for groundwater recharge and controls flows from the Hansen Dam and Big Tujunga Dam. Sheldon Pit, a privately operated gravel pit owned by Vulcan Materials Company, is located north of the intersection of Sheldon Street and Glenoaks Boulevard. Open spaces are located northeast of Sheldon Pit, including the Hansen Dam, Hansen Lake, and Hansen Dam Golf Course. Other uses surrounding this area primarily consist of manufacturing, industrial, and auto-related uses.

East: The foundations of the demolished cooling towers are located in the southeastern portion of the VGS. The eastern portion of the VGS also contains Units 5 through 8 and associated equipment and storage. The Truesdale Training Center, an LADWP training grounds, is located northeast of the VGS property. Auto-dismantling and other auto-related commercial and manufacturing uses are located on the eastern boundary of VGS, along Glenoaks Boulevard. The Sun Valley Landfill, an actively operating landfill owned by Vulcan Materials Company, is located east of the intersection of Glenoaks Boulevard and Sheldon Street.

South: The foundations of the demolished cooling towers are located in the southeastern portion of the VGS. The southern portion of the VGS contains the switchyard, south of Units 1–4. To the southwest of Units 1–4 is the Joint Safety and Training Institute. The southern boundary of the VGS is formed by Sheldon Street, which provides the main access to the VGS property. Several industrial, manufacturing and auto-related uses are located along Sheldon Street. The Bradley Landfill and Recycling Center, owned by Waste Management Inc., is located south of the intersection of Glenoaks Boulevard and Sheldon Street. The Bradley Landfill ceased operations in June 2007 as a Class III municipal landfill.

West: The western portion of the VGS contains the aforementioned gravel pit northwest of Units 1–4, an Administration Building, and parking to the west of Units 1–4. Other components within the VGS property include the Raw Water Storage Tank, and excess storage areas. The western boundary of the VGS is formed by Old San Fernando Road, which was previously used as the VGS main access road and entrance, but is now an unmaintained road that

dead-ends west of the VGS. The shared Metrolink Antelope Valley line and Union Pacific Freight line runs parallel between the Old San Fernando Road and San Fernando Road. Medical (Sierra Medical Clinic and Pacifica Hospital of the Valley), residential, manufacturing, industrial, and commercial uses are located along San Fernando Road.

1.4 Environmental Setting

Sun Valley-La Tuna Canyon Community Plan

The project site is located in the Sun Valley neighborhood and within the Sun Valley-La Tuna Canyon Community Plan Area (Community Plan Area). Sun Valley was originally developed as a train stop on the Southern Pacific Railroad, which was built between 1874 to 1876. The town was annexed in 1915 and has developed into the Northeast Valley's industrial base. The new community was promoted as an area with a fuel pipe, natural gas line, electricity, aqueduct, water, and switching facilities. Among the first products manufactured were water heaters, metal windows, and sand and gravel as the major industry.

The project site is designated as Public Facilities within the General Plan. According to the Sun Valley-La Tuna Canyon Community Plan (Community Plan), there is a need for modernizing of public facilities in order to improve services and accommodate changes in the Community Plan Area (City of Los Angeles 1999).

Zoning and Land Use

The project site currently has a land use designation of Public Facilities (City of Los Angeles 2018b) and is zoned Public Facilities (PF) (City of Los Angeles 2018a). According to the City's Municipal Code, the purpose of the PF zone is to provide regulations for the use and development of publicly owned land in order to implement the City's adopted General Plan. In particular, the circulation and service systems designations in the City's adopted district and community plans, and other relevant General Plan elements, including the circulation, public recreation, and service systems elements (City of Los Angeles 2019).

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2 PROJECT DESCRIPTION

2.1 Background

According to the 2017 Power Strategic Long-Term Resource Plan (SLTRP), LADWP aims to identify a portfolio of power generation resources that meets the City's energy needs consistent with LADWP's environmental priorities and reliability standards. A main focus of the SLTRP is reducing GHG emissions while ensuring reliable electric service and maintaining cost competitive rates by examining multiple strategies to reduce GHG emissions. LADWP's policy for renewables was initiated in the early 2000s, and has guided the adoption of increasing levels of renewable energy (LADWP 2017). Additionally, SB 100 requires that 60% of electricity generated and sold to retail customers per year be from eligible renewable energy resources by December 31, 2030.

LADWP proposes to demolish VGS Units 1–4 and the related systems and equipment, the bearing cooling tower foundation and skim pond north of the units, and the remaining foundations of four cooling towers east of the units. As shown in Figure 2, the related systems and equipment located near Units 1–4 that would also be demolished include the external connected turbine deck, circulating water piping connections, the oil water separator, the Fifth Street pipe trench, and the weld shop. These previously decommissioned units contain hazardous materials, including asbestos, lead paint, and mercury-containing instruments, and removal of these materials and the aging infrastructure is necessary to maintain a safe working environment for LADWP plant personnel. The A/B Basins would be abandoned in place, and the RO trailer would not be demolished but would be removed from this location. The inactive piping in the Fifth Street pipe trench would be demolished and removed, but the piping associated with the A/B Basins would remain in the trench. At least one prefabricated trailer would be added near Units 5, 6, and 7 to house workers, since the location would be more centrally located to the site than the existing administration building. Upon completion of construction, the entire project site would be backfilled to surrounding grade. The VGS Units 1–4 generation block may be used in the future for new facilities, including renewable energy projects that would help LADWP meet SB 100 requirements and GHG reduction goals. However, the need, timing, and nature of any future projects at VGS is currently unknown, and if such projects are proposed in the future, they would be subject to additional environmental assessment prior to any approvals or implementation.

2.2 Demolition Activities and Sequencing

As previously discussed, the project would include demolition of structures and systems within the demolition boundaries identified in Figure 2 (with the exception of the A/B Basins, located by the Fifth Street pipe trench, which would remain in service, and the RO trailer, between Units 3 and 4, which would be relocated). Demolition activities associated with the proposed project are anticipated to begin in fall 2021 and continue through the end of winter 2024. The duration of the demolition activities would be approximately 31 months, and would take place 5 days per week, Monday through Friday, with typical working hours starting from 6:00 a.m. to 3:00 p.m.

The general procedures that would be followed during demolition are described below. Although certain activities must precede others (e.g., hazardous waste must be removed before structures are demolished, and structures must be demolished before the removal of subgrade facilities), the actual sequencing of procedures may vary to some degree, and there would likely be an overlap of various activities occurring in different areas of the project site. However, the type and scope of the activities described provide a basis to assess potential environmental impacts from the proposed project.

Preparatory Work

Construction vehicles would access the site via the second access driveway along Old San Fernando Road. The access driveway and internal road would undergo minor repairs to allow for improved access for construction vehicles. Repairs would include pavement restoration that would occur over a period of approximately 2 months.

Hazardous Waste Removal

Hazardous waste removal at each Unit would occur prior to demolition of the Unit. Activities would primarily involve asbestos and lead abatement, and is anticipated to occur over a period of approximately 8 months. The steam boilers and associated structures would be entirely enclosed in a containment tent. Inside the containment tent, individual negative-air-containments would be supported with scaffolding, and 10-millimeter-thick low-density polyethylene sheeting would be wrapped around the scaffolding to seal individual structures, piping areas, and equipment. Negative-air machines would be powered by electricity and run 24 hours a day to scrub the air inside the containment by capturing airborne particles in a HEPA filter. Interior lighting would also require electricity. The HEPA filters and air quality conditions would be monitored daily, and the filters would be changed regularly according to regulatory standards. Hazardous materials removed from the units would be properly contained and disposed of at a hazardous materials landfill.

Demolition

Structures proposed for demolition outside of the Units would be demolished first. The RO trailer would not be demolished but would be removed from this location. The A/B basins immediately north of the Units would remain in service, while connecting pipes within Fifth Street would be removed and the remaining trench would be backfilled. Removal of the Fifth Street pipes and trench backfill would take approximately one month, followed by demolition of the oil water separator and demolition of the weld shop over a period of approximately 3 months.

Demolition of the units would occur over a period of approximately 15 months and would include the related structures and systems within the identified demolition area (Figure 2). It is likely that Units 1 and 2 would be demolished together, and Units 3 and 4 would be demolished together because they are connected to each other. After removal of hazardous materials, each unit would be demolished starting from the exterior turbine deck and equipment and working toward the interior boilers, tubing and other piping within the structure. The stacks would be removed through cutting and removing sections from the top downward so that pieces fall into the existing structures.

Once demolished, the concrete foundations of Units 1–4 would be crushed and backfilled over a period of approximately 9 months. Additionally, the concrete foundations of the bearing cooling tower and the four cooling tower foundations east of the units would be crushed and backfilled over a period of approximately 3 months. Other outlying structures to be demolished and removed include the skim pond north of the Units. Demolition and backfill of the skim pond would take approximately 2 months.

Excavation and Subgrade Work

Excavation for removal of substructures would occur down to approximately 15 feet below ground surface. Subgrade demolition would include removal of the four cooling tower foundations, the bearing cooling tower foundation, the skim pond, the foundations of Units 1–4 and removal of substructures within the demolition boundaries, such as the circulating water lines, fuel tanks and oil sumps adjacent to each unit, and the Fifth Street pipe trench. Further subgrade work would include the removal of concrete footings, which, once removed, would be backfilled with crushed concrete. Rock crushers would be used to crush the concrete foundations, which would be used to backfill the project site to grade. A limited amount of imported material may also be required to fill deeper excavation areas. Below grade demolition activities and ongoing crushing activities are expected to occur for approximately 21 months throughout the majority of demolition activities.

Material Hauling

LADWP estimates that the project would generate 87,366 cubic yards of construction waste over the approximately 31-month project timeline. The demolished material would be stockpiled on site until enough material has been amassed to efficiently haul it off site. Over the course of the project life, the number of haul trips would be approximately 9,280 haul trips. The metals (the majority is steel, with other metals, including copper, brass, and chrome) would likely be hauled to a recycler. There are several potential landfill and recycling centers that accept construction and demolition debris and recycling within 2 miles[1] of the project site, with the exception of hazardous materials, such as asbestos and lead abatement waste, which would be hauled and disposed of at an appropriate site that accepts hazardous waste. Eighty-thousand-pound tractor-trailer trucks would be used to haul materials away, and no oversized loads are anticipated. The largest load would be the generator rotors, which cannot be disassembled, and they would be hauled away using a flatbed tractor-trailer.

2.3 Demolition Equipment, Truck Trips, and Personnel

All required construction equipment and vehicles would access the site via the second driveway along Old San Fernando Road, which borders the western side of the VGS property. All construction equipment and worker vehicles for the proposed project would be staged within the VGS boundary. Construction equipment, trucks and worker vehicles would be staged in an empty

[1] The construction and demolition contractor may opt to use these facilities or other facilities in the region, depending on circumstances such as daily capacities at the facility, waste quantities, and type of waste, at the time that disposal needs are warranted. For purposes of this analysis, it was assumed that waste would be hauled to nearby facilities within 2 miles of the site. See Section 3.3, Air Quality, for further details.

lot north of the existing employee parking and south of the Raw Water Storage Tank in the western portion of the VGS property. In addition, demolition contractors would require temporary trailers on site for demolition management activities, which would be staged within the VGS property. At least one prefabricated trailer would also be provided for existing LADWP employees near Units 5, 6, and 7 to house workers, since the location would be more centrally located to the project site than the existing administration building. Construction traffic would be restricted to entering and exiting the site from Old San Fernando Road, a dead-end street that does not support through-traffic. It is likely that oversized equipment, such as large and heavy excavators and cranes, would be delivered at night to avoid peak traffic times.

The proposed project would require the operation of various pieces of heavy equipment on site, including excavators, cranes, loaders, tractors, crushing equipment, graders, and pavers. The type and level of use of this equipment would vary across the phases of work, with an estimated daily peak of approximately 10 pieces of equipment occurring during several months of the proposed project. The peak number of daily off-site truck trips would be about 20 roundtrips for several months in the later stages of the proposed project. During the balance of the proposed project, the number of daily truck roundtrips would be substantially lower, often less than 10 per day. These truck trips would generally be distributed throughout the workday, rather than concentrated during a particular portion of the day. The number of daily on-site personnel would range from a low of 15 to a high of 112, peaking at or above 100 during numerous months of the project. It was assumed that these personnel would each generate a vehicle trip inbound to the project site in the morning and a separate vehicle trip outbound from the project site in the afternoon.

2.4 Project Design Features and Construction Regulatory Requirements

The following commitments would be employed during construction of the proposed project to help minimize or eliminate potential impacts to the environment. These commitments are distinguished from mitigation measures because they are best management practices (BMPs) required by law, regulation, or policy; are ongoing, regularly occurring professional practices; or are project design features (PDFs) that would be implemented as part of the project.

PDF-TRAF-1 **Use of Alternate Project Access**: For the duration of peak construction phase (anticipated to occur during the overlap of construction phases with demolition of Units 3 and 4), the project Construction Manager/Contractor shall allow the construction-related worker traffic to use an alternate exit (Main Gate) from the site located along Sheldon Street, during the PM peak hour. The Contractor shall install a sign prohibiting right turns out of the Main Gate along Sheldon Street to ensure that the outbound traffic turns left and travels east along Sheldon Street during the PM peak hour (3:00 p.m.–6:00 p.m.). With fewer workers being allowed to utilize an alternate exit during the PM peak hour, the proposed project would not contribute to or cause a hazardous condition at the San Fernando Road/Sheldon Street intersection and operational deficiencies at the Interstate (I) 5 northbound on-ramp–Rincon Avenue/Sheldon Street, I-5 northbound off-ramp–Jerome Street/Laurel Canyon Boulevard, and I-5 southbound ramps/Laurel Canyon Boulevard intersections.

Grading, excavation, and construction is required to comply with the 2016 California Building Code, as they relate to site preparation and construction, alteration, moving, demolition, repair, and structures and building service equipment. The California Building Code requires the preparation of engineering geologic reports, supplemental ground response reports, and/or geotechnical reports for all new construction, new structures on existing sites, and alterations to existing buildings. It also includes seismic design criteria and requirements for use in the structural design of buildings (i.e., based on seismic hazard maps and the seismic design category) and specifies building components that require special seismic certification.

Activities at the project site shall comply with existing federal, state, and local regulations regarding hazardous material use, storage, disposal, and transport to prevent project-related risks to public health and safety. All on-site generated waste that meets hazardous criteria shall be stored, manifested, transported, and disposed of in accordance with Title 22 of the California Code of Regulations and in a manner to the satisfaction of the local Certified Unified Program Agency.

Consistent with standard operation procedures and regulatory requirements, construction contractors would be required to implement the following BMPs:

- Trucks and equipment entering the project site shall be inspected to be free from oil, gasoline, or other vehicle fluid leaks.
- Equipment fueling areas shall be located away from storm drains.
- All hazardous material spills and contaminated soils shall be excavated immediately upon discovery to minimize soil and water contamination and the potential of wildlife being poisoned or otherwise harmed.
- The contractor shall maintain hazardous materials spill control, containment, and cleanup kits of adequate size and materials for potential accidental spills and releases to nearby storm drains.

The proposed project would be required to comply with National Pollutant Discharge Elimination System (NPDES) requirements for control of discharges of sediments and other pollutants during construction. A stormwater pollution prevention plan (SWPPP) would be prepared and submitted to the State Water Resources Control Board (SWRCB). A SWPPP identifies receiving water risks (e.g., Section 303[d] impairments, beneficial uses of downstream water bodies) and potential sources of pollutants during construction, as well as specifies BMPs that would prevent construction pollutants from contacting stormwater with the intent of keeping products of erosion from moving off site into receiving waters. Typical measures to prevent wind and water erosion may include, but are not limited to, application of water during earthwork activities, flattened cut and fill slopes, sand bags, straw waddles, and no work on high wind days. The proposed project would obtain coverage under the General Permit for Discharges of Stormwater Associated with Construction Activity in effect at the time of grading permit application. The SWPPP would also require preparation of an Erosion and Sediment Control Plan. If groundwater dewatering is required, a dewatering permit would be required.

The proposed project would be required to comply with the NPDES Municipal Separate Storm Sewer System (MS4) permit issued by the Los Angeles Regional Water Quality Control Board (RWQCB). The proposed project would

implement appropriate BMPs to prevent new sources of stormwater pollutants. These BMPs include source-control features such as drainage facility inspection and maintenance (non-structural BMPs), MS4 stenciling and signage (i.e., for inlets), and protection of slopes and channels (against erosion and/or scour). The following list includes examples of BMPs that would be implemented during demolition activities:

- Stockpile containment and exposed soil stabilization structures (e.g., Visqueen plastic sheeting, fiber rolls, gravel bags and/or hydroseed);
- Storm drain inlets in the demolition area would be surrounded by gravel bags or other suitable methods of filtration.
- All potential hazardous wastes would be contained, transported, and disposed of in accordance with applicable regulations.
- Demolition work areas would be regularly swept and kept clean, orderly, and free of trash.
- All authorized non-stormwater discharges would be identified in the SWPPP along with BMPs that would be implemented to eliminate or reduce pollutants, which may include use of settling tanks or screens to reduce suspended sediment loads.

2.5 Discretionary Approvals Required for the Project

Numerous approvals and/or permits would be required to implement the proposed project. The environmental documentation for the project 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 Water and Power

- Adoption of the MND by the Board of Commissioners
- Approval of the proposed project by the Board of Commissioners

South Coast Air Quality Management District

- Demolition Permit
- Fugitive Dust Abatement Plan Approval (Rule 403)

Los Angeles Regional Water Quality Control Board

- General Stormwater Permit Associated with Construction Activities

2.6 References Cited

City of Los Angeles. 1999. Sun Valley-La Tuna Canyon Community Plan Update, CPC File No. 97-0046 CPU. Adopted August 13, 1999.

City of Los Angeles. 2018a. Zoning Map. Accessed April 2019. http://zimas.lacity.org/.

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LADWP. 2018. *Valley Generating Station Units 1–4, Demolitions and Available Land for Re-Use.* Prepared by Generating Station and Facilities Engineering. July 12, 2018.

LADWP. 2020. *Generation Ratings and Capacities of Power Sources*. January 10, 2018.

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3 INITIAL STUDY CHECKLIST

The following discussion of potential environmental effects was completed in accordance with Section 15063(d)(3) of the CEQA Guidelines (2019) to determine if the proposed project may have a significant effect on the environment.

1. Project title:

Valley Generating Station Demolition Project (Units 1–4 and Associated Structures)

2. Lead agency name and address:

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

3. Contact person and phone number:

James R. Howe
Environmental Planning and Assessment
Los Angeles Department of Water and Power
213.367.0414

4. Project location:

The project site is located within the VGS in the City, in the San Fernando Valley region of the County. Generally, the VGS is in the northeastern portion of the City in the Sun Valley neighborhood, to the northeast of the I-5 and SR-170 intersection. Access to the VGS is provided from Sheldon Street, which forms the southern site boundary. The VGS is surrounded by the County's Department of Public Works Hansen Spreading Grounds Facility to the north; auto-dismantling shops and manufacturing uses to the south and east; the Bradley Landfill and Recycling Center to the south; and hospital, commercial, and residential uses to the west.

Specifically, the VGS is located at 11801 Sheldon Street. The project site consists of VGS Units 1–4 and related structures and systems in the central portion of the VGS property, the bearing cooling tower foundation and skim pond north of the units, and four foundations of demolished cooling towers in the southeast portion of VGS.

5. Project sponsor's name and address:

Los Angeles Department of Water and Power
111 North Hope Street
Los Angeles, California 90012

6. City Council Districts:

District 6

7. Neighborhood Council Districts:

Sun Valley Area Neighborhood Council

8. General plan designation:

Refer to Section 1.3 of this IS.

9. Zoning:

Refer to Section 1.3 of this IS.

10. Description of project:

Refer to Chapter 2 of this IS.

11. Surrounding land uses and setting:

Refer to Section 1.3 of this IS.

12. Other public agencies whose approval is required:

- SWRCB
- Los Angeles RWQCB
- South Coast Air Quality Management District (SCAQMD)

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

Consultation is underway. Refer to Section 3.18 of this IS for further details.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See PRC Section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

Environmental Factors Potentially Affected

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

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

Determination

On the basis of this initial evaluation:

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

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

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

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

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

Signature — Charles C. Holloway, Manager, Environmental Planning and Assessment

Date: 12/29/2020

Evaluation Of Environmental Impacts

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an Environmental Impact Report (EIR) is required.
4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less-Than-Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
    a. Earlier Analysis Used. Identify and state where they are available for review.
    b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
   a. The significance criteria or threshold, if any, used to evaluate each question; and
   b. The mitigation measure identified, if any, to reduce the impact to less than significance.

3.1 Aesthetics

Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
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?	☐	☐	☒	☐

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

Less-Than-Significant Impact. Scenic views or vistas in the City include public views to natural features. The City General Plan identifies views of the ocean, mountains, unique natural features, and certain historic resources as scenic features in the City worthy of protection. Major scenic resources in the City include the San Gabriel and Santa Susana Mountains, which bound the City on the north; the Santa Monica Mountains, which extend across the middle of the City; and the Palos Verdes Hills and Pacific Ocean to the south and west (City of Los Angeles 2001). Of these scenic resources, the Santa Susan Mountains and San Gabriel Mountains are visible from the project site to the north and east.

The project would include demolition of structures and systems within the demolition boundaries identified in Figure 2. Much of the work involves the demolition and removal of substructures such as concrete foundations. However, above-grade structures to be removed that are visible from public vantage points include Units 1–4 and the associated exhaust stacks, external structures, and equipment. As shown in the photographs in Figure 3, Existing Conditions, the exhaust stacks associated with Units 1–4 are the most prominent features of the project that are visible from surrounding public vantage points. The exhaust stacks are approximately 250 feet tall, and the primary structures of the units are up to approximately 150 feet tall (LADWP 1951, 1953, 1954), and partially block the Santa Susana and San Gabriel Mountains from view, as shown in Photos A, B, and C of Figure 3. Many other existing elements external to the project site also contribute to the partial blockage of the mountains, including existing utility poles, streetlights, trees, and intervening development. The cooling tower foundations, skim pond, weld shop, and various substructures proposed for demolition and removal are not visible from public vantage points, as these project elements are relatively flat, low-lying, or below grade and do not contribute to view blockage. During project construction, tall construction equipment such as cranes and other equipment that would be used for demolition would be visible on the project site, potentially resulting in temporarily increased blockage of the mountains to the north and east. However, construction activities would be temporary, as project construction is anticipated to occur over a period of 31 months. Upon completion, the project would remove distinct vertical elements from the view and result in reduced view blockage of the surrounding mountain ranges from public vantage points. As such, impacts would be less than significant.

b) 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. The County has multiple eligible and officially designated state scenic highways. The nearest eligible state scenic highway to the project site includes a segment of the I-210 approximately 2 miles north of the project site; the nearest officially designated state scenic highway includes a segment of SR-2, approximately 3.25 miles northeast of the project site (Caltrans 2019). Additionally, a segment of I-110 is a designated historic parkway located approximately 14.7 miles southeast of the project site (Caltrans 2019).

The Community Plan designates Stonehurst Avenue (approximately 1.02 miles northeast of the project site), La Tuna Canyon Road (approximately 1.11 miles southeast of the project site), Wentworth Street (approximately 0.75 miles northeast of the project site), and the Foothill Freeway (I-210) as scenic highways. The Community Plan designates scenic highways as roadways that merit the protection and enhancement of scenic resources. Further, the Community Plan proposes that protective land use controls be established for scenic corridors visible from these roadways. These roadways offer views to the San Gabriel Mountains, the Verdugo Mountains, Hansen Dam, and nearby horse ranches (City of Los Angeles 1999).

The scenic highways and associated scenic corridors are primarily located east of the project site. Therefore, the project site is not within the scenic corridors associated with these scenic roadways. Further, due to intervening

development and vegetation, the project site is largely blocked from view from these scenic roadways. However, the existing exhaust stacks associated with Units 1–4 are approximately 250 feet tall, and the primary structures of the units are up to approximately 150 feet tall (LADWP 1951, 1953, 1954). These tall features could be visible from segments of the scenic roadways. The cooling tower foundations are not particularly discernible from scenic roadways or other public vantage points, as these project elements are relatively flat and low-lying. The project would result in the removal of tall, vertical features associated with Units 1–4 from the view. These features do not contribute to the scenic value of the views available within the scenic corridors, and removal would not result in an adverse impact to scenic quality. Therefore, the project would not result in impacts to scenic resources within a scenic highway, and impacts would be less than significant.

c) In non-urbanized areas, would the project 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 points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less-Than-Significant Impact. The project site is located in an urbanized area within the community of Sun Valley in the City of Los Angeles. The project site is zoned Public Facilities (PF) (City of Los Angeles 2018). There are no specific provisions related to scenic quality applicable to the Public Facilities Zone. The City designates scenic parkway specific plan areas and scenic corridor specific plan areas within the City, which set forth regulations governing scenic quality. However, the project site is not located within a scenic parkway specific plan or a scenic corridor specific plan area. The project involves the demolition and removal of Units 1–4 and associated structures and equipment, and the foundations of four cooling towers, leaving vacant space within the VGS. The project does not involve the construction of new facilities within the VGSs property, and any potential future energy projects would be separately analyzed at a later time. At least one prefabricated trailer would be added near Units 5, 6, and 7 to house existing LADWP employees, as the location would be more centrally located to the project site than the existing administration building. However, it is unlikely that the prefabricated trailer(s) would be visible from public vantage points. Further, the project site is entirely developed with industrial development, and the addition of the trailer(s) would not result in a conflict with existing zoning or other regulations governing scenic quality. As discussed in Section 3.1(a–b), the project would not result in an adverse impact on a protected scenic vista or scenic resources within a scenic highway. Therefore, the project would not conflict with applicable zoning or other regulations governing scenic quality. The project would result in no impact.

Photo Location and Direction

Project Boundary

Photo A - View looking north toward the project site from the intersection of San Fernando Road and Allegheny Street, approximately 0.4-mile south of the project site.

Photo B - View looking northeast toward the project site from Truesdale Street, east of the intersection of Truesdale Street and El Dorado Avenue, approximately 0.35-mile west of the project site.

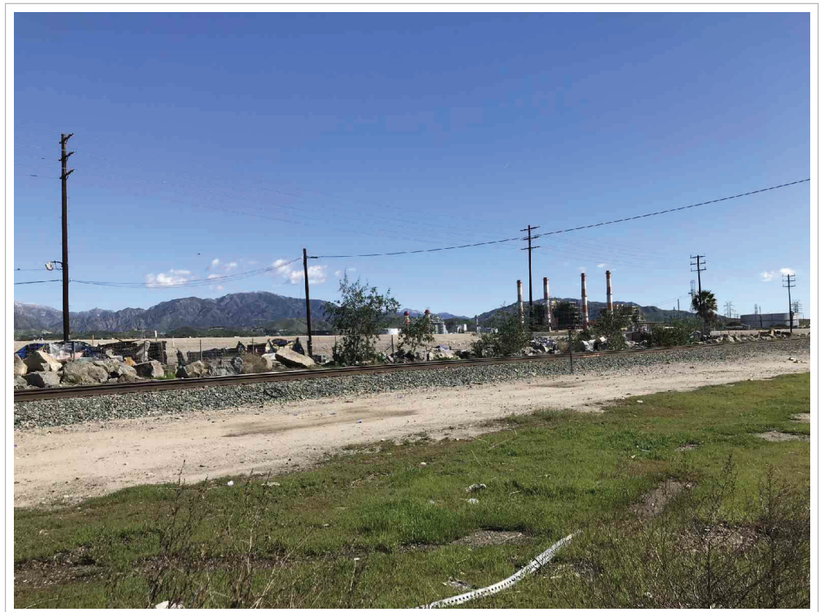

Photo C - View looking southeast toward the project site from San Fernando Road, west of the Hansen Spreading Grounds, approximately 0.47-mile northwest of the project site.

Photo D - View looking south toward the project site from Glenoaks Boulevard, east of the Hansen Spreading Grounds, approximately 0.52-mile north of the project site.

Los Angeles Department of Water & Power

FIGURE 3

Existing Conditions

Valley Generating Station

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

Less-Than-Significant Impact. Existing sources of light or glare on or near the project site consists of parking lot lighting, safety and security lighting, streetlights, and interior and exterior building lights in the surrounding commercial and manufacturing areas. The project involves the demolition and removal of Units 1–4 and associated infrastructure, and the concrete foundations of four cooling tower, leaving vacant space within the VGS property. The duration of the demolition activities would be approximately 31 months, and would take place 5 days per week, Monday through Friday, with typical working hours from 6:00 a.m. to 3:00 p.m. Therefore, demolition activities would occur during the day and would not require nighttime lighting. Additionally, the project does not involve the construction of new permanent structures that would create additional sources of light or glare. As previously discussed, at least one prefabricated trailer would be added near Units 5, 6, and 7. The prefabricated trailer(s) would include interior lighting and exterior safety and security lighting. Lighting associated with the trailer(s) is expected to be minimal, and would be subject to the regulations set forth in the California Green Building Standards Code (CALGreen) for illumination. CALGreen sets forth minimum requirements based on Lighting Zones, as defined in Chapter 10 of the California Administrative Code. The requirements are designed to minimize light pollution in an effort to maintain darks skies and ensure new development reduces backlight, uplight, and glare (BUG) from exterior light sources (CALGreen 2016). The project site is located within Lighting Zone 3, which establishes ambient illumination standards for urban areas (California Administrative Code 2016). The project would be required to comply with the maximum allowable BUG rating for Lighting Zone 3, as defined in Table 5.106.8 [N] of the CALGreen. Therefore, compliance with the CALGreen standards for urban areas would ensure that the project would not result in a substantial new source of light or glare which would adversely affect day or nighttime views in the area; impacts would be less than significant.

References Cited

Caltrans (California Department of Transportation). 2019. California Scenic Highway Mapping System. Accessed May 2019. www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways.

City of Los Angeles. 1999. *Sun Valley-La Tuna Community Plan.* https://planning.lacity.org/complan/pdf/svycptxt.pdf.

City of Los Angeles. 2001. *City of Los Angeles General Plan, Conservation Element.* https://planning.lacity.org/cwd/gnlpln/consvelt.pdf.

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LADWP. 1954. "Design Equipment Section; Right Side Elevation Unit No. 4. Valley Steam Plant." Sheet set. Drawing Number M-90020. Los Angeles, California: LADWP Engineering Division.

3.2 Agriculture and Forestry Resources

Would the project:	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 Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.				
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?	☐	☐	☐	☒

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

No Impact. The project is located within the boundaries of VGS, which is zoned Public Facilities (PF) and has been operating as a power plant since 1951. As shown on maps pursuant to the California Department of Conservation's Farmland Mapping and Monitoring Program, the VGS property is designated as "other land" and does not meet the definition of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (DOC 2016a). Therefore, the project would not result in conversion of Farmland to non-agricultural use, and no impact would occur.

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

No Impact. The project is located within the boundaries of VGS, which is zoned Public Facilities (PF) (City of Los Angeles 2019). According the California Department of Conservation's Williamson Act Parcel map for Los Angeles County, the project site is not located on or adjacent to any lands under a Williamson Act contract. The Los Angeles County Williamson Act 2015/2016 Map designates the project site and surrounding land as non-Williamson Act Land (DOC 2016b). In addition, the project site and surrounding area are not zoned for agricultural uses. As such, implementation of the project would not conflict with existing zoning for agricultural use or land under a Williamson Act contract. Therefore, the project would not conflict with existing agricultural zoning 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 is located within the boundaries of VGS and is zoned Public Facilities (PF) (City of Los Angeles 2019). The property would not require rezoning of existing forest land, timberland, or timberland zoned Timberland production; thus, 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. The project is located within the boundaries of VGS and is zoned Public Facilities (PF) (City of Los Angeles 2019). The property is not forest land that would be converted to non-forest use, and there is no forest land located near the project site. Therefore, there would be no loss or conversion of forest land, and 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. The project is located within the boundaries of VGS and is zoned Public Facilities (PF) (City of Los Angeles 2019). The surrounding land uses include residential, commercial, medical, industrial, manufacturing, and auto-related uses, and there is no Farmland in the project vicinity. Therefore, the project would not involve other changes to the environment that would result in the conversion of Farmland to non-agricultural use, and no impact would occur.

References Cited

City of Los Angeles. 2019. Planning and Zoning Dataset, viewed with the Zimas Mapping Application. [digital GIS data]. Accessed May 6, 2019. https://zimas.lacity.org.

DOC (Department of Conservation). 2016a. Los Angeles County Important Farmland 2016, Farmland Mapping and Monitoring Program. Map Published July 2017. ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf.

DOC. 2016b. Los Angeles County Williamson Act FY 2005/2016. Accessed July 2019. Map Published 2016. ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf.

3.3 Air Quality

Would the project:	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.				
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?	☐	☐	☒	☐

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

Less-Than-Significant Impact. The project site is located within the South Coast Air Basin (SCAB), which includes the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County, and is within the jurisdictional boundaries of the SCAQMD.

The SCAQMD administers the Air Quality Management Plan (AQMP) for the SCAB, which is a comprehensive document outlining an air pollution control program for attaining all California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The most recent adopted AQMP is the 2016 AQMP (SCAQMD 2017), which was adopted by the SCAQMD Governing Board in March 2017. The 2016 AQMP represents a new approach, focusing on available, proven, and cost-effective alternatives to traditional strategies while seeking to achieve multiple goals in partnership with other entities promoting reductions in GHGs and toxic risk, as well as efficiencies in energy use, transportation, and goods movement (SCAQMD 2017).

The purpose of a consistency finding is to determine if a project is inconsistent with the assumptions and objectives of the regional air quality plans, and, thus, if it would interfere with the region's ability to comply with federal and state air quality standards. The SCAQMD has established criteria for determining consistency with the currently applicable AQMP in Chapter 12, Sections 12.2 and 12.3, in the SCAQMD CEQA Air Quality Handbook. The criteria are as follows (SCAQMD 1993):

- Whether the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the AQMP.
- Whether the project would exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

To address the first criterion regarding the project's potential to result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or interim emission reductions in the AQMP, project-generated criteria air pollutant emissions were estimated and analyzed for significance and are addressed under Section 3.3(b). Detailed results of this analysis are included in Appendix A. As presented in Section 3.3(b), demolition conducted under the project would not generate criteria air pollutant emissions that would exceed the SCAQMD thresholds, and the project is not anticipated to generate operational criteria air pollutant emissions.

The second criterion regarding the project's potential to exceed the assumptions in the AQMP or increments based on the year of project buildout and phase is primarily assessed by determining consistency between the project's land use designations and potential to generate population growth. In general, projects are considered consistent with, and would not conflict with or obstruct implementation of, the AQMP if the growth in

socioeconomic factors is consistent with the underlying regional plans used to develop the AQMP (per Consistency Criterion No. 2 of the SCAQMD CEQA Air Quality Handbook). The SCAQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) developed by the Southern California Association of Governments (SCAG) for its Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) (SCAG 2016), which is based on general plans for cities and counties in the SCAB, for the development of the AQMP emissions inventory (SCAQMD 2017).[2] The SCAG 2016 RTP/SCS, and associated Regional Growth Forecast, are generally consistent with the local plans; therefore, the 2016 AQMP is generally consistent with local government plans.

As discussed in Section 1.4, the project site is currently zoned Public Facilities (PF) (City of Los Angeles 2018a) and has a land use designation of Public Facilities (City of Los Angeles 2018b). The project is consistent with the existing land use designation and does not propose a change in land use designation. Accordingly, the project is consistent with the SCAG RTP/SCS forecasts used in the SCAQMD AQMP development. In addition, the proposed project does not propose additional land for development, nor would it induce additional population in the project area. Because the proposed project would involve only the demolition of existing structures, there would not be an increase in population in the region associated with its implementation. Accordingly, the project is consistent with the SCAG RTP/SCS forecasts used in the SCAQMD AQMP development.

In summary, based on the considerations presented for the two criteria, impacts relating to the project's potential to conflict with or obstruct implementation of the applicable AQMP 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. Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the SCAQMD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are used in the determination of whether a project's individual emissions would have a cumulatively considerable contribution on air quality. If a project's emissions would

[2] Information necessary to produce the emission inventory for the SCAB is obtained from the SCAQMD and other governmental agencies, including the California Air Resources Board (CARB), the Caltrans, and SCAG. Each of these agencies is responsible for collecting data (e.g., industry growth factors, socioeconomic projections, travel activity levels, emission factors, emission speciation profile, and emissions) and developing methodologies (e.g., model and demographic forecast improvements) required to generate a comprehensive emissions inventory. SCAG incorporates these data into its Travel Demand Model for estimating/projecting vehicle miles traveled and driving speeds. SCAG's socioeconomic and transportation activities projections in their 2016 RTP/SCS are integrated in the 2016 AQMP (SCAQMD 2017).

exceed the SCAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant (SCAQMD 2003).

A quantitative analysis was conducted to determine whether proposed construction activities would result in a cumulatively considerable net increase in emissions of criteria air pollutants for which the SCAB is designated as nonattainment under the NAAQS or CAAQS. Criteria air pollutants include ozone (O_3), nitrogen dioxide (NO_2), carbon monoxide (CO), sulfur dioxide (SO_2), particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM_{10}), particulate matter with an aerodynamic diameter less than or equal to 2.5 microns ($PM_{2.5}$), and lead. Pollutants that are evaluated herein include volatile organic compounds (VOCs) and oxides of nitrogen (NO_x), which are important because they are precursors to O_3, as well as CO, sulfur oxides (SO_x), PM_{10}, and $PM_{2.5}$.

Regarding NAAQS and CAAQS attainment status,[3] the SCAB is designated as a nonattainment area for national and California O_3 and $PM_{2.5}$ standards. The SCAB is designated as a nonattainment area for California PM_{10} standards; however, it is designated as an attainment area for national PM_{10} standards. The SCAB nonattainment status of O_3, $PM_{10,}$ and $PM_{2.5}$ standards is the result of cumulative emissions from various sources of air pollutants and their precursors within the SCAB, including motor vehicles, off-road equipment, and commercial and industrial facilities. The SCAB is designated as an attainment area for national and California NO_2, CO, and SO_2 standards. Although the SCAB has been designated as partial nonattainment (Los Angeles County) for the federal rolling 3-month average lead standard, it is designated attainment for the state lead standard (CARB 2019a; EPA 2019).[4]

Appendix G of the CEQA Guidelines indicates that, where available, the significance criteria established by the applicable air district may be relied upon to determine whether a project would have a significant impact on air quality. The SCAQMD has established Air Quality Significance Thresholds, as revised in April 2019, which set forth quantitative emissions significance thresholds below which a project would not have a significant impact on ambient air quality (SCAQMD 2019). The quantitative air quality analysis provided herein applies the SCAQMD thresholds to determine the potential for the project to result in a significant impact under CEQA. The SCAQMD mass daily

[3] An area is designated as in attainment when it is in compliance with the NAAQS and/or the CAAQS. The NAAQS and CAAQS are set by the Environmental Protection Agency and CARB, respectively, for the maximum level of a given air pollutant that can exist in the outdoor air without unacceptable effects on human health or the public welfare. Attainment = meets the standards; attainment/maintenance = achieve the standards after a nonattainment designation; nonattainment = does not meet the standards.

[4] Re-designation of the lead NAAQS designation to attainment for the Los Angeles County portion of the SCAB is expected based on current monitoring data. The phase out of leaded gasoline started in 1976. Since gasoline no longer contains lead, the project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.

construction thresholds are as follows: 75 pounds per day for VOC, 100 pounds per day for NO_x, 550 pounds per day for CO, 150 pounds per day for SO_x, 150 pounds per day for PM_{10}, and 55 pounds per day for $PM_{2.5}$.

The following discussion quantitatively evaluates project-generated impacts associated with demolition and qualitatively evaluates operational impacts that would result from implementation of the proposed project.

Construction (Demolition) Emissions

Proposed construction activities would result in the temporary addition of pollutants to the local airshed caused by on-site sources (i.e., off-road construction equipment and soil disturbance) and off-site sources (i.e., on-road haul trucks, delivery trucks, and worker vehicle 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. Therefore, such emission levels can only be approximately estimated with a corresponding uncertainty in precise ambient air quality impacts.

The California Emissions Estimator Model (CalEEMod) Version 2016.3.2 was used to estimate emissions for construction of the proposed project. CalEEMod is a statewide computer model developed in cooperation with air districts throughout the state to quantify criteria air pollutant emissions associated with construction activities from a variety of land use projects, such as residential, commercial, and industrial facilities. CalEEMod input parameters, including the land use type used to represent the project and size, construction schedule, and anticipated construction equipment utilization, were based on information provided by LADWP and default model assumptions when project-specific data was not available.

For the purpose of estimating project emissions, it is assumed that construction of the project would start in October 2020 and would last approximately 31 months, ending in May 2023. Construction of the project is anticipated to start in fall 2021; however, assuming a start date of October 2020 represents a worst-case scenario for criteria air pollutant and GHG emissions because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years. Accordingly, the emissions estimated for the project are conservative. Table 1 shows the construction phasing schedule and duration, vehicle trip assumptions, and construction equipment mix used for estimating the project-generated emissions.

Regarding vehicles trips to and from the site, all worker trips were assumed to be a one-way distance of 14.7 miles consistent with CalEEMod default values. Within the vicinity of the project site, there are various options for vendors (materials) and disposal sites. As such, project-specific vendor and haul truck trip distances were used. For the minimal vendor trucks anticipated, a one-way trip distance of 3 miles was

assumed.[5] For haul trucks, a one-way trip distance of 2 miles[6] was assumed with the exception of Phase II Asbestos/Lead Abatement and Waste Removal truck trips, where a one-way trip distance of 33 miles[7] was assumed, and equipment transport, which was assumed to be 46 miles[8] per one-way trip. During Phase I, preparation for and delivery of temporary buildings and equipment would occur, which would require truck deliveries that were modeled as haul trucks as total truck trips (rather than daily truck trips). During Phase I, concrete truck trips for foundation preparation were estimated to be 3 miles one-way, steel building delivery truck trips were estimated to be 175 miles one-way, and delivery of interior building components were estimated to have a 50-mile one-way truck trip length.[9]

[5] Vendor truck trips include delivery of asphalt, which is anticipated to originate from either Blue Diamond Materials located 3 miles from the project site or Vulcan Materials Company located 2.5 miles from the project site.

[6] There are several potential landfill and recycling centers that accept construction and demolition debris within the project area, including Vulcan Sun Valley IDEF (1 mile from the project site), Waste Management East Valley Diversion (located 0.5 miles from the project site), and SA Recycling (located 2 miles from the project site).

[7] Because hazardous materials are not accepted at all landfills, potential dump sites for asbestos and lead abatement removed from the project site were identified to be US Ecology Vernon (28 miles from the project site), Waste Management Azusa (33 miles from the project site), and Clean Harbors (29 miles from the project site).

[8] Anticipated equipment rental vendors include the following: Quinn Company (12 miles from the project site), Bragg Companies (37 miles from the project site), and Maxim Crane Works (46 miles from the project site).

[9] For the temporary buildings, concrete is anticipated to be sourced locally; the steel building components are anticipated to originate in Visalia, California; and the interior building component origin is unknown, so a conservative assumption of 50 miles was used.

Table 1. Construction Scenario Assumptions

Construction Phase	Construction Subphases Included	Start Date	End Date	One-Way Vehicle Trips			Equipment		
				Average Daily Worker Trips	*Average Daily Vendor Truck Trips*	*Total Haul Truck Trips*	*Equipment Type*	*Quantity*	*Usage Hours*
Equipment Delivery 1	Delivery of Equipment	10/15/2020	10/15/2020	0	0	4	NA	NA	NA
Phase IA Demolition Preparatory Work	VGS Old Gate Pavement Restoration, Other Preparatory Work	10/15/2020	12/16/2020	20	6	0	Excavators	1	2
							Graders	1	2
Phase IB Temporary Equipment	Concrete Foundation Preparation	10/26/2020	3/12/2021	0	0	254	NA	NA	NA
Phase IB Temporary Equipment	Steel Building Delivery/Construction	2/15/2021	5/14/2021	4	0	4	Cranes	1	6
Phase IB Temporary Equipment	Delivery/Installation of Interior Building Components and Equipment	4/26/2021	7/23/2021	4	0	26	Cranes	1	6
Phase II Asbestos/Lead Abatement and Waste Removal	Outlying Asbestos/Lead Abatement and Waste Removal Unit 1 Asbestos/Lead Abatement and Waste Removal Unit 2 Asbestos/Lead Abatement and Waste	12/14/2020	07/16/2021	36	0	306	Negative-air machines (electric)[a]	40	24

Table 1. Construction Scenario Assumptions

Construction Phase	Construction Subphases Included	Start Date	End Date	One-Way Vehicle Trips			Equipment		
				Average Daily Worker Trips	*Average Daily Vendor Truck Trips*	*Total Haul Truck Trips*	*Equipment Type*	*Quantity*	*Usage Hours*
	Removal Unit 3 Asbestos/Lead Abatement and Waste Removal Unit 4 Asbestos/Lead Abatement and Waste Removal								
Equipment Delivery 2	Delivery of Equipment	07/12/2021	07/16/2021	0	0	38	NA	NA	NA
Phase III Demolition of Outlying Structures	Fifth Street Pipe Removal and Trench Backfill	07/19/2021	08/13/2021	28	0	268	3rd Member Excavator Shears (495 HP)	1	6
							Crawler Tractors	1	6
							Graders	1	6
Crushing	Ongoing Crushing	07/19/2021	04/14/2023	4	0	0	Crushing/Processing Equipment	1	8
Phase III Demolition of Outlying Structures	Oil Water Separator Removal	08/09/2021	08/27/2021	36	0	96	Crawler/ Hydraulic Crane (612 HP)	1	6
							Skidsteer Loaders	1	6
							Excavator (Small)	1	6
							Graders	1	6

Table 1. Construction Scenario Assumptions

Construction Phase	Construction Subphases Included	Start Date	End Date	One-Way Vehicle Trips			Equipment		
				Average Daily Worker Trips	*Average Daily Vendor Truck Trips*	*Total Haul Truck Trips*	*Equipment Type*	*Quantity*	*Usage Hours*
Phase III Demolition of Outlying Structures	Weld Shop Demolition	09/13/2021	10/29/2021	44	0	6	2nd Member Shear/Hammer (475 HP)	1	6
							Excavator 2nd Member (450 HP)	1	6
							Track Loaders (250 HP)	1	6
							Skidsteer Loaders	1	6
							Excavator (Small)	1	6
							Graders	1	6
Phase IV Demolition of Units	Demolition of Unit 1 Turbine Deck and Equipment Demolition of Unit 2 Turbine Deck and Equipment	10/29/2021	01/20/2022	76	0	1,000	2nd Member Shear/Hammer (475 HP)	2	6
							Crawler/ Hydraulic Crane (612 HP)	2	6
							Track Loaders (250 HP)	2	6
							Size Wheel Loaders (350 HP)	2	6
							Skidsteer Loaders	2	6

Table 1. Construction Scenario Assumptions

Construction Phase	Construction Subphases Included	Start Date	End Date	One-Way Vehicle Trips			Equipment		
				Average Daily Worker Trips	*Average Daily Vendor Truck Trips*	*Total Haul Truck Trips*	*Equipment Type*	*Quantity*	*Usage Hours*
Phase IV Demolition of Units	Demolition of Unit 1 Boiler Tubing and Other Piping Demolition of Unit 1 Stack Breaching Ducts	11/19/2021	03/23/2022	26	0	638	3rd Member Excavator Shears (495 HP)	1	6
							Excavator 2nd Member (450 HP)	1	6
Phase IV Demolition of Units	Demolition of Unit 1 Stack Demolition of Unit 2 Stack	02/03/2022	05/26/2022	46	0	22	2nd Member Shear/Hammer (475 HP)	1	6
							Crawler/ Hydraulic Crane (612 HP)	1	6
							Track Loaders (250 HP)	1	6
							Size Wheel Loaders (350 HP)	1	6
							Skidsteer Loaders	1	6
Phase IV Demolition of Units	Demolition of Unit 2 Boiler Tubing and Other Piping Demolition of Unit 2 Stack Breaching Ducts	02/11/2022	06/16/2022	26	0	638	3rd Member Excavator Shears (495 HP)	1	6
							Excavator 2nd Member (450 HP)	1	6

Table 1. Construction Scenario Assumptions

Construction Phase	Construction Subphases Included	Start Date	End Date	One-Way Vehicle Trips			Equipment		
				Average Daily Worker Trips	*Average Daily Vendor Truck Trips*	*Total Haul Truck Trips*	*Equipment Type*	*Quantity*	*Usage Hours*
Phase IV Demolition of Units	Demolition of Unit 1 Boiler Framing Demolition of Unit 2 Boiler Framing	03/03/2022	07/07/2022	48	0	956	3rd Member Excavator Shears (495 HP)	1	6
							2nd Member Shear/Hammer (475 HP)	1	6
							Excavator 2nd Member (450 HP)	1	6
							Track Loaders (250 HP)	1	6
							Size Wheel Loaders (350 HP)	1	6
							Skidsteer Loaders	1	6
Phase IV Demolition of Units	Demolition of Unit 3 Turbine Deck and Equipment Demolition of Unit 4 Turbine Deck and Equipment	06/03/2022	08/25/2022	76	0	1,174	2nd Member Shear/Hammer (475 HP)	2	6
							Crawler/ Hydraulic Crane (612 HP)	2	6
							Track Loaders (250 HP)	2	6

Table 1. Construction Scenario Assumptions

Construction Phase	Construction Subphases Included	Start Date	End Date	One-Way Vehicle Trips			Equipment		
				Average Daily Worker Trips	*Average Daily Vendor Truck Trips*	*Total Haul Truck Trips*	*Equipment Type*	*Quantity*	*Usage Hours*
							Size Wheel Loaders (350 HP)	2	6
							Skidsteer Loaders	2	6
Phase IV Demolition of Units	Demolition of Unit 3 Boiler Tubing and Other Piping Demolition of Unit 3 Stack Breaching Ducts	06/24/2022	10/27/2022	26	0	1,078	3rd Member Excavator Shears (495 HP)	1	6
							Excavator 2nd Member (450 HP)	1	6
Phase IV Demolition of Units	Demolition of Unit 3 Boiler Framing Demolition of Unit 4 Boiler Framing	08/26/2022	02/09/2023	48	0	1,616	3rd Member Excavator Shears (495 HP)	1	6
							2nd Member Shear/Hammer (475 HP)	1	6
							Excavator 2nd Member (450 HP)	1	6
							Track Loaders (250 HP)	1	6
							Size Wheel Loaders (350 HP)	1	6
							Skidsteer Loaders	1	6

Table 1. Construction Scenario Assumptions

Construction Phase	Construction Subphases Included	Start Date	End Date	One-Way Vehicle Trips			Equipment		
				Average Daily Worker Trips	*Average Daily Vendor Truck Trips*	*Total Haul Truck Trips*	*Equipment Type*	*Quantity*	*Usage Hours*
Phase IV Demolition of Units	Demolition of Unit 3 Stack Demolition of Unit 4 Stack	09/09/2022	12/29/2022	46	0	22	2nd Member Shear/Hammer (475 HP)	1	6
							Crawler/ Hydraulic Crane (612 HP)	1	6
							Track Loaders (250 HP)	1	6
							Size Wheel Loaders (350 HP)	1	6
							Skidsteer Loaders	1	6
Phase IV Demolition of Units	Demolition of Unit 4 Boiler Tubing and Other Piping Demolition of Unit 4 Stack Breaching Ducts	09/16/2022	01/19/2023	26	0	1,078	3rd Member Excavator Shears (495 HP)	1	6
							Excavator 2nd Member (450 HP)	1	6
Phase V Below Grade Demolition	Unit 1, 2, 3, and 4 Foundation Removal and Backfill	07/11/2022	04/14/2023	30	0	282	Excavator 2nd Member (450 HP)	1	6
							Size Wheel Loaders (350 HP)	1	6
							Skidsteer Loaders	1	6

Table 1. Construction Scenario Assumptions

Construction Phase	Construction Subphases Included	Start Date	End Date	One-Way Vehicle Trips			Equipment		
				Average Daily Worker Trips	*Average Daily Vendor Truck Trips*	*Total Haul Truck Trips*	*Equipment Type*	*Quantity*	*Usage Hours*
Phase V Below Grade Demolition	3 A/B and 4 A/B Cooling Tower Foundation Removal and Backfill	01/09/2023	03/03/2023	28	0	92	2nd Member Shear/Hammer (475 HP)	1	6
							Size Wheel Loaders (350 HP)	1	6
							Skidsteer Loaders	1	6
Phase V Below Grade Demolition	Bearing Cooling Tower Foundation Removal and Backfill Skim Pond Removal and Backfill	01/30/2023	04/07/2023	28	0	8	2nd Member Shear/Hammer (475 HP)	1	6
							Size Wheel Loaders (350 HP)	1	6
							Skidsteer Loaders	1	6
Phase VI Demolition Closing Work	Site Restoration Substantial Completion Date Demobilization	07/11/2022	05/05/2023	44	4	0	Crawler Tractors	1	6
							Excavator (Small)	1	6
							Graders	2	6
							Pavers	2	6
							Paving Equipment	2	6

Table 1. Construction Scenario Assumptions

Construction Phase	Construction Subphases Included	Start Date	End Date	One-Way Vehicle Trips			Equipment		
				Average Daily Worker Trips	*Average Daily Vendor Truck Trips*	*Total Haul Truck Trips*	*Equipment Type*	*Quantity*	*Usage Hours*
Equipment Return	Return of Equipment	04/17/2023	04/21/2023	0	0	42	NA	NA	NA

Notes: NA = not applicable; VGS = Valley Generating Station; HP = horsepower.
See Appendix A for details**.**
While construction of the project is anticipated to start in fall 2021, the analysis assumes a construction start date of October 2020, which represents a worst-case scenario for criteria air pollutant and GHG emissions because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.
California Emissions Estimator Model (CalEEMod) default horsepower values were used except when noted in parenthesis.
[a] Negative-air machines are electrically powered. No criteria air pollutant emissions are associated with the negative-air machines, which are not included in the CalEEMod run. However, greenhouse gas (GHG) emissions from electricity use would occur, which is included in the GHG emissions and energy analyses, and calculated using a spreadsheet model.

Internal combustion engines used by construction equipment, trucks, and worker vehicles would result in emissions of VOCs, NO_x, CO, PM_{10}, and $PM_{2.5}$. PM_{10} and $PM_{2.5}$ emissions would also be generated by entrained dust, which results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil. The project would be required to comply with SCAQMD Rule 403 to control dust emissions during any dust-generating activities. Standard construction practices that would be employed to reduce fugitive dust emissions include watering of the active grading areas two times per day, with additional watering depending on weather conditions.

Table 2 provides estimated maximum daily construction criteria air pollutant emissions from all on-site and off-site emission sources.

Table 2. Estimated Maximum Daily Construction Emissions

Year	VOC	NO_x	CO	SO_x	PM_{10}[a]	$PM_{2.5}$[a]
	pounds per day					
2020	0.52	5.19	4.08	0.01	1.68	0.45
2021	7.29	69.74	45.59	0.16	6.01	3.01
2022	9.46	82.38	69.10	0.25	8.76	3.83
2023	7.34	57.62	56.76	0.20	8.47	3.12
Maximum Daily Emissions	**9.44**	**82.38**	**69.10**	**0.25**	**8.76**	**3.83**
SCAQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: SCAQMD 2019.
Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District.
See Appendix A for detailed results.
[a] These estimates reflect control of fugitive dust (watering two times daily) required by SCAQMD Rule 403.

As shown in Table 2, daily construction emissions would not exceed the SCAQMD significance thresholds for VOC, NO_x, CO, SO_x, PM_{10}, or $PM_{2.5}$ during project construction.

As discussed previously, the SCAB has been designated as a federal nonattainment area for O_3 and $PM_{2.5}$ and a state nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. Proposed construction activities of the project would generate VOC and NO_x emissions (which are precursors to O_3) and emissions of PM_{10} and $PM_{2.5}$. However, as indicated in Table 2, project-generated construction emissions would not exceed the SCAQMD emission-based significance thresholds for VOC, NO_x, PM_{10}, or $PM_{2.5}$, and therefore the project would not cause a cumulatively significant impact.

Cumulative localized impacts would potentially occur if a construction project were to occur concurrently with another off-site project. Construction schedules for potential future projects near the project site are currently unknown; therefore, potential construction impacts associated with two or more simultaneous projects would

be considered speculative.[10] However, future projects would be subject to CEQA and would require air quality analysis and, where necessary, mitigation. Criteria air pollutant emissions associated with construction activity of future projects would be reduced through implementation of control measures required by the SCAQMD. Cumulative PM_{10} and $PM_{2.5}$ emissions would also be reduced because all future projects would be subject to SCAQMD Rule 403 (Fugitive Dust), which sets forth general and specific requirements for all construction sites in the SCAQMD. In addition, cumulative VOC emissions would be subject to SCAQMD Rule 1113 (Architectural Coatings). Based on the previous considerations, the project would not result in a cumulatively considerable increase in emissions of nonattainment pollutants, and impacts would be less than significant.

Operational Emissions

Once project construction is complete, no operational activities associated with the proposed project would occur (no routine daily equipment operation or vehicle trips would be required). The temporary buildings are anticipated to generate the same criteria air pollutant emissions as the existing permanent structures, and no net change would occur. Because the project would not result in any long-term operational activities, there would be no potential air quality impacts associated with operational air pollutant emissions.

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

Less-Than-Significant Impact. Localized project impacts associated with construction criteria air pollutants and toxic air contaminants (TACs) emissions are assessed as follows.

Sensitive Receptors

Sensitive receptors are those individuals more susceptible to the effects of air pollution than the population at large. People most likely to be affected by air pollution include children, the elderly, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993). The closest sensitive receptor land uses are residences and a hospital located approximately 1,100 feet to the southwest of the project site.

Localized Significance Thresholds

The SCAQMD recommends a localized significance threshold (LST) analysis to evaluate localized air quality impacts to sensitive receptors in the immediate vicinity of the project site as a result of construction activities. The impacts were analyzed using methods consistent with those in the SCAQMD's Final Localized Significance

[10] The CEQA Guidelines state that if a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact (14 CCR 15145). This discussion is nonetheless provided in an effort to show good-faith analysis and comply with CEQA's information disclosure requirements.

Threshold Methodology (SCAQMD 2008). The project is located in Source Receptor 7 (East San Fernando Valley). The project's construction activities would occur over differing areas; however, the entire project area would not be disturbed in one day. For the purposes of the LST analysis, emissions thresholds based on a 1-acre site were utilized, which was estimated using the SCAQMD's *Fact Sheet for Applying CalEEMod to Localized Significance Threshold* (SCAQMD 2011).[11] This is a conservative approach, as LSTs increase with the size of project site. As mentioned previously, the closest sensitive receptors are residences and a hospital located approximately 1,100 feet (approximately 335 meters) to the southwest of the project site. SCAQMD lookup table LST values for 200 meters and 500 meters within Source Receptor Area 7 with an area of 1 acre were interpolated to generate LSTs for the project that reflect a distance of 335 meters.[12]

Project construction activities would result in temporary sources of on-site criteria air pollutant emissions associated with construction equipment exhaust and dust-generating activities. Table 3 presents the maximum daily on-site[13] construction emissions generated during construction of the project and a comparison to the SCAQMD localized significance criteria for Source Receptor Area 7 to determine whether project-generated on-site construction emissions would result in potential LST impacts.

Table 3. Construction Localized Significance Thresholds Analysis

Year	NO_2	CO	PM_{10}	$PM_{2.5}$
	pounds per day (on site)			
2020	2.18	1.27	0.53	0.14
2021	71.15	41.80	4.72	2.76
2022	72.24	55.02	5.99	2.97
2023	55.35	50.20	6.32	2.53
Maximum Daily Emissions	**72.24**	**55.02**	**6.32**	**2.97**

[11] Because the project primarily includes demolition activities, the vast majority of the equipment used would not be for earth movement. Nonetheless, to estimate an area for the LST criteria, the SCAQMD's *Fact Sheet for Applying CalEEMod to Localized Significance Threshold* (SCAQMD 2011) was applied, which assumes that during an 8-hour day, graders and crawler tractors can disturb a maximum of 0.5 acres. In accordance with the construction assumptions presented in Table 2, the area calculated based on use of graders and crawler tractors ranged from 0.5 acres to 1.5 acres, though most phases had neither type of earth-moving equipment. As such, the 1 acre is an appropriate assumption for the LST determination.

[12] The pounds per day LST for a 1-acre site and 200-meter distance are 122 for NO_x, 2,227 for CO, 54 for PM_{10}, and 18 for $PM_{2.5}$. The pounds per day LST for a 1-acre site and 500-meter distance are 191 for NO_x, 7,267 for CO, 136 for PM_{10}, and 68 for $PM_{2.5}$. Accordingly, the pounds per day LST for a 1-acre site and 335-meter distance are calculated to be 153 for NO_x, 4,495 for CO, 91 for PM_{10}, and 41 for $PM_{2.5}$.

[13] According to the Final LST Methodology, "off-site mobile emissions from the project should not be included in the emissions compared to the LSTs" (SCAQMD 2008).

Table 3. Construction Localized Significance Thresholds Analysis

Year	NO_2	CO	PM_{10}	$PM_{2.5}$
	pounds per day (on site)			
SCAQMD LST Criteria	*153*	*4,495*	*91*	*41*
Threshold Exceeded?	**No**	**No**	**No**	**No**

Source: SCAQMD 2009.
Notes: NO_2 = nitrogen dioxide; CO = carbon monoxide; PM_{10} = particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District; LST = localized significance threshold.
See Appendix A for detailed results.
Localized significance thresholds are shown for a 1-acre project site corresponding to a distance to a sensitive receptor of 335 meters.

As shown in Table 3, proposed construction activities would not generate emissions in excess of site-specific LSTs; therefore, localized project construction impacts would be less than significant.

CO Hotspots

Traffic-congested roadways and intersections have the potential to generate localized high levels of CO. Localized areas where ambient concentrations exceed federal and/or state standards for CO are termed CO "hotspots." CO transport is extremely limited, because CO disperses rapidly with distance from the source. Under certain extreme meteorological conditions, however, CO concentrations near a congested roadway or intersection may reach unhealthy levels, affecting sensitive receptors. Typically, high CO concentrations are associated with severely congested intersections. Projects contributing to adverse traffic impacts may result in the formation of a CO hotspot. Additional analysis of CO hotspot impacts would be conducted if a project would result in a significant impact or contribute to an adverse traffic impact at a signalized intersection that would potentially subject sensitive receptors to CO hotspots. During construction of the project, construction traffic would affect the intersections near the project site. However, the proposed project would be temporary and would not be a source of daily, long-term mobile-source emissions. In addition, due to continued improvement in vehicular emissions at a rate faster than the rate of vehicle growth and/or congestion, the potential for CO hotspots in the SCAB is steadily decreasing. Finally, as discussed in Section 3.17, Transportation, of this IS/MND, transportation impacts would be less than significant with mitigation. Furthermore, as discussed in Chapter 2 of this IS/MND, the project would not require operational staff because the project would consist of vacant land once complete. Therefore, the project would not generate additional traffic volumes that would result in CO hot spots. This impact would be less than significant.

Toxic Air Contaminants

TACs are defined as substances that may cause or contribute to an increase in deaths or in serious illness, or that may pose a present or potential hazard to human health. As discussed under the LST analysis, the closest sensitive receptor land uses are residences and a hospital located approximately 1,100 feet to the southwest of the project site.

Please see Section 3.9, Hazards and Hazardous Materials, for an evaluation of asbestos and lead paint, which are suspected to be present within and around the generating units. Of note, all asbestos-containing materials would be stored, handled, transported, and disposed of in accordance with the provisions established in SCAQMD Rule 1403 (Asbestos Emission from Demolition/Renovation Activities).

Health effects from carcinogenic air toxics are usually described in terms of cancer risk. The SCAQMD recommends an incremental cancer risk threshold of 10 in 1 million. "Incremental cancer risk" is the net increased likelihood that a person continuously exposed to concentrations of TACs resulting from a project over a 9-, 30-, and 70-year exposure period will contract cancer based on the use of standard Office of Environmental Health Hazard Assessment risk-assessment methodology (OEHHA 2015). In addition, some TACs have non-carcinogenic effects. The SCAQMD recommends a Hazard Index of 1 or more for acute (short-term) and chronic (long-term) non-carcinogenic effects.[14] TACs that would potentially be emitted during construction activities associated with the proposed project would be diesel particulate matter.

Diesel particulate matter emissions would be emitted from heavy equipment operations and heavy-duty trucks. Heavy-duty construction equipment is subject to a California Air Resources Board (CARB) Airborne Toxics Control Measure for in-use diesel construction equipment to reduce diesel particulate emissions. As described for the LST analysis, PM_{10} and $PM_{2.5}$ (representative of diesel particulate matter) exposure would be minimal. According to the Office of Environmental Health Hazard Assessment, health risk assessments (which determine the exposure of sensitive receptors to toxic emissions) should be based on a 30-year exposure period for the maximally exposed individual resident; however, such assessments should also be limited to the period/duration of activities associated with the project. The duration of the proposed construction activities would constitute a small percentage of the total 30-year exposure period. The construction period for the proposed project would be approximately 31 months, after which construction-related TAC emissions would cease. In addition, sensitive receptors are located over 1,100 feet from the active project areas, which would reduce exposure to TACs as TAC emission dispersion increases with distance. Due to this relatively short period of exposure and minimal particulate emissions on site, TACs generated during construction would not be expected to result in concentrations causing significant health risks.

Following completion of on-site construction activities, the project would not involve any routine operational activities, and thus, would not generate TAC emissions. For the reasons previously described, the project would not result in substantial TAC exposure to sensitive receptors in the vicinity of the proposed project, and impacts would be less than significant.

[14] Non-cancer adverse health risks are measured against a hazard index, which is defined as the ratio of the predicted incremental exposure concentrations of the various non-carcinogens from the project to published reference exposure levels that can cause adverse health effects.

Health Effects of Criteria Air Pollutants

Construction emissions of the project would not exceed the SCAQMD thresholds for any criteria air pollutants, including VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$. In addition, the project is not anticipated to result in operational emissions.

Health effects associated with O_3 include respiratory symptoms, worsening of lung disease leading to premature death, and damage to lung tissue (CARB 2019b). VOCs and NO_x are precursors to O_3, for which the SCAB is designated as nonattainment with respect to the NAAQS and CAAQS. The contribution of VOCs and NO_x to regional ambient O_3 concentrations is the result of complex photochemistry. The increases in O_3 concentrations in the SCAB due to O_3 precursor emissions tend to be found downwind of the source location because of the time required for the photochemical reactions to occur. Further, the potential for exacerbating excessive O_3 concentrations would also depend on the time of year that the VOC emissions would occur, because exceedances of the O_3 NAAQS and CAAQS tend to occur between April and October when solar radiation is highest. Due to the lack of quantitative methods to assess this complex photochemistry, the holistic effect of a single project's emissions of O_3 precursors is speculative. That being said, because the proposed project would not exceed the SCAQMD thresholds, the proposed project would not contribute to health effects associated with O_3.

Health effects associated with NO_x include lung irritation and enhanced allergic responses (CARB 2019b). Because project-related NO_x emissions would not exceed the SCAQMD mass daily thresholds, and because the SCAB is a designated attainment area for NO_2 (and NO_2 is a constituent of NO_x) and the existing NO_2 concentrations in the area are well below the NAAQS and CAAQS standards, it is not anticipated that the proposed project would cause an exceedance of the NAAQS and CAAQS for NO_2 or result in potential health effects associated with NO_2 and NO_x.

Health effects associated with CO include chest pain in patients with heart disease, headache, light-headedness, and reduced mental alertness (CARB 2019b). CO tends to be a localized impact associated with congested intersections. The associated potential for CO hotspots was discussed previously and determined to be less than significant. Thus, the project's CO emissions would not contribute to significant health effects associated with CO.

Health effects associated with PM_{10} include premature death and hospitalization, primarily for worsening of respiratory disease (CARB 2019b). Construction of the project would not exceed thresholds for PM_{10} or $PM_{2.5}$, would not contribute to exceedances of the NAAQS and CAAQS for particulate matter, and would not obstruct the SCAB from coming into attainment for these pollutants. The project would also not result in substantial diesel particulate matter emissions during construction. Additionally, the project would be required to comply with SCAQMD Rule 403, which limits the amount of fugitive dust generated during construction.

Due to the minimal contribution of particulate matter during construction, the project is not anticipated to result in health effects associated with PM_{10} or $PM_{2.5}$.

In summary, construction and operation of the proposed project would not result in exceedances of the SCAQMD significance thresholds for criteria pollutants, and potential health effects associated with criteria air pollutants 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. Other emissions associated with the project are anticipated to be limited to odors, which is assessed herein. The occurrence and severity of potential odor impacts depend on numerous factors. The nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying, cause distress among the public, and generate citizen complaints.

During project construction, exhaust from equipment may produce discernible odors typical of most construction sites. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment. However, such odors would disperse rapidly from the project site and generally occur at magnitudes that would not affect substantial numbers of people. Accordingly, impacts associated with odors during construction would be less than significant.

Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding (SCAQMD 1993). The project would not include activities following construction; therefore, project operation would not entail any of these potentially odor-causing land uses. Because the project would not create any new sources of odor during operation, and project operations would result in a less than significant related to other emissions (i.e., odors).

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3.4 Biological Resources

Would the project:	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
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?	☐	☐	☐	☒

The following analysis relies on a biological resources assessment conducted by Dudek biologist Tommy Molioo in February 2019, as well as a focused bat survey conducted by Dudek in October 2019. The biological resources assessment included a r eview of the latest available relevant literature, published research, maps, soil data, data on biological baselines, special-status habitats, and species distributions to determine those resources that have the potential

to occur within the project site and surrounding 100-foot buffer (the study area). The field assessment was conducted to characterize the environmental conditions, vegetation communities/land covers, and any plants or wildlife (including their habitats) that could be impacted during project implementation. During the field survey, vegetation communities and land covers were catalogued and confirmed based on existing site conditions. Vegetation communities were mapped according to the CDFW List of Vegetation Alliances and Associations (or Natural Communities List), which is based on A Manual of California Vegetation, Second Edition (Sawyer et. al. 2009). Land covers not included in the List of Vegetation Alliances and Associations followed the Orange County Habitat Classification System (Gray and Bramlet 1992). Dudek compiled a general inventory of plant and wildlife species detected by sight, calls, tracks, scat, or other field indicators, and made a determination concerning the potential for special-status species to occur within the study area. Additionally, Dudek conducted a preliminary investigation of the extent and distribution of jurisdictional waters of the United States regulated by the U.S. Army Corps of Engineers, jurisdictional waters of the state regulated by the RWQCB, and CDFW jurisdictional streambed and associated riparian habitat.

Dudek searched the CDFW's California Natural Diversity Database (CDFW 2019a), CDFW's list of special-status plant and wildlife species (CDFW 2019b–2019e), the California Native Plant Society's Inventory of Rare and Endangered Plants (CNPS 2019), and the U.S. Fish and Wildlife Service's occurrence data (USFWS 2019a) to identify special-status biological resources from the region (Appendix B). The California Natural Diversity Database and California Native Plant Society were searched based on the U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle map for Van Nuys, where the study area is located, as well as the surrounding eight USGS 7.5-minute quadrangle maps (i.e., Canoga Park, Burbank, Oat Mountain, San Fernando, Sunland, Topanga, Beverly Hills, and Hollywood). Potential and/or historic drainages and aquatic features were investigated based on a review of USGS topographic maps (1:24,000 scale), aerial photographs, the National Wetland Inventory database (USGS 2019a; USFWS 2019b), and the Natural Resource Conservation Service Web Soil Survey (USDA 2019).

The study area is predominantly developed as the entire of the study area contains the existing VGS facility that is characterized by concrete and asphalt, with steel and brick structures for the various power plant buildings, generating units, and smoke stacks. Scattered ornamental trees are located within the study area, and the majority of the study area is devoid of vegetation. The only areas on the project site containing native vegetation include a small stand of thickleaf yerba santa (*Eriodictyon crassifolium*) within the demolition area for the Bearing Cooling Tower Foundation, as well as native mulefat (*Baccharis salicifolia*), Fremont cottonwood (*Populus fremontii*), and thickleaf yerba santa in the gravel pit located to the northwest of the units, outside of any proposed demolition areas. No wetland or riparian vegetation was observed within the study area; however, there is a small retention basin in the eastern portion of the study area that historically collected overflow from the previous cooling towers, but does not convey natural flows from a natural drainage or creek. No flowing water was observed in the study area. A limited number of wildlife species were observed or detected during the field survey of the study area, including American crow (*Corvus brachyrhynchos*), mourning dove (*Zenaida macroura*), house sparrow (*Passer domesticus*), California ground squirrel (*Spermophilus beecheyi*), and western fence lizard (*Sceloporus occidentalis*).

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

Less-Than-Significant Impact with Mitigation Incorporated. The project site is located within a predominantly developed area of the VGS facility that is dominated by concrete and asphalt, with very little native vegetation and even less native soils that could support special-status plant and wildlife species. The vast majority of the surface soils on the project site have been compacted and constructed upon so that no characteristics of the native soils mapped on the project site were observed. There is a small stand of thickleaf yerba santa scrub located in the northern portion of the project site, however, this native vegetation community does not provide suitable habitat for any special-status plant species known to occur in the region such as Braunton's milk-vetch (*Astragalus brauntonii*), Nevin's barberry (*Berberis nevinii*), or Plummer's mariposa lily (*Calochortus plummerae*). Therefore, there will be no impact on any special-status plant species through demolition of the proposed project.

Additionally, the limited native habitats on site and the dominance of developed land significantly reduces the potential for special-status wildlife species to occur on the project site. Although the thickleaf yerba santa scrub on site is a native vegetation community, it does not provide suitable habitat for special-status wildlife species known to occur in the region such as the coastal California gnatcatcher (*Polioptila californica californica*), least Bell's vireo (*Vireo bellii pusillus*), or western pond turtle (*Emys marmorata*). Therefore, there is no potential for any special-status wildlife species to occur on the project site, and the project will result in no impact to special-status wildlife.

However, the ornamental trees and existing structures of the decommissioned power generating units provide potential suitable nesting habitat for a variety of common bird species known to occur in the area and protected by the Migratory Bird Treaty Act and California Fish and Game Code Section 3500 et seq. Bird nests are known to occur within the rafters and walkways of the generating units, as well as within trees adjacent to demolition sites. Therefore, if project activities commence during the bird breeding season of February through August, there may be a potential direct and indirect impact to nesting birds, which would be considered significant. Mitigation Measure (MM) BIO-1 below would reduce potential impacts to nesting birds to a less-than-significant level.

MM-BIO-1 In order to reduce any potential indirect impact to nesting birds, project activities should commence outside of the general avian nesting season from February through August. If construction activities cannot avoid the nesting season, then a pre-construction survey shall be conducted by a trained biologist to determine the presence/absence of any nesting birds within the project site and 500-foot buffer around the site. If an active nest is found, a suitable buffer based on the species sensitivity and proximity to the Area of Disturbance shall be placed around the nest for the duration of the nesting period. Construction may continue within this

buffer at the discretion of a monitoring biologist in coordination with the LADWP construction manager. The buffer can be removed when the nest is no longer active, as determined by a trained biologist. Due to the prolonged project duration and potential for birds to construct nests in various areas on the project site, a Nesting Bird Guidance Plan shall be prepared for the project to guide the Los Angeles Department of Water and Power (LADWP) and construction personnel on the appropriate measures to take during project activities throughout the site to allow the project to continue with minimal stoppage.

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

Less-Than-Significant Impact with Mitigation Incorporated. While the project site does not contain any rivers or streams that could support native riparian habitat, a small (approximately 0.25 acre) stand of thickleaf yerba santa scrub is located within the Bearing Cooling Tower Foundation proposed demolition area, which is considered a CDFW-ranked S3 sensitive natural community . If demolition of the cooling tower foundation also results in the removal of this vegetation community, this project-related impact to a sensitive natural community would be considered significant and would require compensatory habitat-based mitigation. MM-BIO-2 below would reduce impacts to this community to a less-than-significant level.

MM-BIO-2 In order to reduce project-related impacts to approximately 0.25 acre of thickleaf yerba santa scrub habitat on site, a CDFW-ranked S3 sensitive natural community, LADWP shall either conduct on-site or off-site habitat restoration of in-kind habitat at a 3:1 ratio. Mitigation shall be carried out either by conserving a portion of the VGS facility (either through a conservation easement or deed restriction) and conducting on-site revegetation of habitat carried out by a Habitat Mitigation Monitoring Plan (HMMP). The HMMP shall also include enhancement activities of the remaining habitat on site. If on site restoration/enhancement is not feasible, LADWP shall purchase off-site mitigation credits from a CDFW-approved mitigation bank in the region.

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?

No Impact. The project site is located entirely within an upland area that is predominantly developed and does not contain any potentially regulated waters or wetlands or the United States or state. There are no drainage courses that enter the project site, or any drainages that connect to downstream areas that could be potentially jurisdictional. Additionally, there are no areas on the project site capable of supporting wetlands or riparian vegetation. The National Wetland Inventory database maps a freshwater pond on the project site,

but the field reconnaissance confirmed this pond as the detention basin that historically received flows from the cooling towers, which is also isolated and does not provide habitat (USGS 2019b). Additionally, a freshwater pond and freshwater wetland is mapped within the gravel pit adjacent to the demolition area, and while the field reconnaissance did observe indicators of a wetland, this area will not be impacted by the demolition project. Finally, a riverine wetland is mapped within the concrete-lined channel to the north of the project site, outside the VGS facility, that is potentially jurisdictional. However, no portions of the project will encroach into this channel or any other potentially regulated water feature on or adjacent to the project site. Therefore, the project would result in no impact to any state or federally protected waters or wetlands, and no mitigation or permitting are required.

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 with Mitigation Incorporated. Wildlife movement corridors, also referred to as dispersal corridors or landscape linkages, are generally defined as linear features along which animals can travel from one habitat or resource area to another. The project site does not contain any greenbelts for wildlife movement, or native vegetation and undeveloped land capable of supporting the movement of wildlife, particularly corridors that facilitate movement of species between larger stands of native habitat. A coyote (*Canis familiaris*) was observed traveling through the project site during the focused bat survey; however, this coyote is believed to be a resident of the site and is accustomed to the high level of regular disturbance and urban setting of the site. The proposed demolition activities for the project would not result in an impact on the ability for medium to small mammal movement on the site. Therefore, the project will have no impact on wildlife movement corridors, and no mitigation is required.

The focused bat survey conducted in October 2019 by Dudek determined that two bat species, canyon bat (*Parastrellus hesperus*) and Mexican free-tailed bat (*Tadarida brasiliensis*), forage and potentially roost on the project site, specifically within and adjacent to Unit 4 and its associated smoke stack. Bats were observed flying around the smoke stack at dusk, and echolocation calls were recorded in the same location throughout the night. The exact location of a potential roost was not confirmed visually during the survey; however, due to the presence of foraging bats, there is a high potential for a bat roost to occur within the smoke stack associated with Unit 4. Therefore, if project activities at this location commence during the maternity breeding season of March through August, there may be a direct impact to a bat maternity roost, which is considered a wildlife nursery site and would be considered a significant impact. MM-BIO-3 below would reduce potential impacts to maternity roosting bats to a less-than-significant level.

MM-BIO-3 In order to reduce any potential impact to roosting bats on the project site, project demolition activity at the smoke stack associated with Unit 4 shall commence outside of the bat maternity

roosting season of March through August. Project demolition activities in this location that occur outside of the maternity roosting season would have no impact on roosting bats because all bats that would still be roosting on site would be volant (i.e., able to fly) and could leave a roost if disturbed, significantly reducing the potential for a significant impact to occur.

However, if the maternity roosting season cannot be avoided for demolition of the smoke stack at Unit 4, a pre-construction survey using acoustic monitoring and mist-netting shall be conducted within 30 days prior to demolition to determine the current roosting status of on-site bats. If pregnant or lactating bats are caught during the mist-netting effort, a Bat Guidance Plan shall be prepared to guide LADWP on how to proceed with the project without impacting a maternity roost. The Bat Guidance Plan shall include details on active monitoring during demolition, recommendations for phased demolition of the smoke stack, and procedures to implement should a maternity roosting bat be injured or impacted during demolition. The Bat Guidance Plan shall be implemented for the remainder of the maternity roosting season.

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

No Impact. The project site is located within the Sun Valley neighborhood of the City of Los Angeles, and therefore is subject to the City's Tree Protection Ordinance. The City of Los Angeles Protected Tree Ordinance, as modified by Ordinance 177404, provides guidelines for the preservation of native Southern California tree species, including all native oak trees, as well as other trees protected within the City, measuring 4 inches or more in cumulative diameter at 4.5 feet above the ground from the base of the tree (City of Los Angeles 2006). Trees protected under this ordinance include all oak trees indigenous to California (excluding scrub oak [*Quercus dumosa*]), Southern California black walnut (*Juglans californica* var. *californica*), California sycamore (*Platanus racemosa*), and California bay (*Umbellularia californica*). No protected trees occur within the project site, nor are any trees proposed to be removed by the project. Therefore, the project would have no impact on any local policies or ordinances protection biological resources such as the City's Tree Protection Ordinance.

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

No Impact. The project site is not located within a Habitat Conservation Plan, Natural Community Conservation Plan, or similar plan. The site is not located within or proximate to any Significant Ecological Area, Land Trust, or Conservation Plan. As such, no impact resulting from a conflict with an adopted conservation plan would occur.

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3.5 Cultural Resources

Would the project:	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
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 formal cemeteries?	☐	☒	☐	☐

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

No Impact. As a result of background research, field survey, and property significance evaluations reported in the Cultural Resources Technical Report prepared for the project (Appendix C), the project site does not have unique or significant historical associations, thus it is not considered a historical resource. The nearest historical resources in proximity to the project are within 1 mile of the project site, none of which intersect or are adjacent to the project site. These resources include one isolated projectile point, the historic San Fernando Road, and a

historic bridge along San Fernando Road over Tujunga Wash. Therefore, the project would not cause substantial adverse change in the significance of a historical resource pursuant to Section 15064.5. No impact would occur.

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

Less-Than-Significant Impact with Mitigation Incorporated. As indicated in Appendix C, no newly or previously recorded archaeological resources were identified within the project area as a result of the California Historical Resources Information System records search, the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search, or during an intensive pedestrian survey. The study area has been extensively disturbed as a result of the development and maintenance of the VGS, and any surficial and/or subsurface evidence of archaeological resource deposits that may be present within the site have likely been disturbed or destroyed. Given these factors, the likelihood of affecting archaeological resources during project implementation is considered to be low. However, in the event that archaeological resources are discovered during ground-disturbing activities, management recommendations for the unanticipated discovery of archaeological resources shall be practiced as indicated in MM-CUL-1. With the implementation of MM-CUL-1, the impact to archaeological resources as a result of the proposed project would be less than significant.

MM-CUL-1 Before initiating ground-disturbing activities, a brief awareness training session for the benefit of all construction workers and supervisory personnel shall be conducted. 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 archaeological resources. In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the proposed project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, can evaluate the significance of the find and determine whether or not additional study is warranted. Should it be required, temporary flagging may be installed around a resource to avoid any disturbances from construction equipment. Depending upon the significance of the find under the California Environmental Quality Act (CEQA) (14 California Code of Regulations Section 15064.5[f]; PRC Section 21082), the archaeologist may record the find to appropriate standards (thereby addressing any data potential) and, in coordination with the LADWP construction manager, allow work to continue. If the archaeologist observes the discovery to be potentially significant under CEQA, additional treatment may be required, such as preparation of an archaeological treatment plan, testing, or data recovery, may be warranted.

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

Less-Than-Significant Impact with Mitigation Incorporated. No prehistoric or historic burials were identified within the project area as a result of the records search. Since the site has been previously developed, ground-disturbing activities associated with demolition of the proposed units are unlikely to uncover human remains. However, in the event that human skeletal remains are uncovered during ground-disturbing activities, management recommendations shall be practiced as indicated in MM-CUL-2. With the implementation of MM-CUL-2, the impact to human remains as a result of the proposed project would be less than significant.

MM-CUL-2 In accordance with California Health and Safety Code Section 7050.5, if potential human remains are found, the lead agency staff and the County Coroner must be immediately notified of the discovery. The coroner would provide a determination within 48 hours of notification. No further excavation or disturbance of the identified material, or any area reasonably suspected to overlie additional remains, can occur until a determination has been made. If the County Coroner determines that the remains are, or are believed to be, Native American, the coroner would notify the Native American Heritage Commission (NAHC) within 24 hours. In accordance with Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendant (MLD) from the deceased Native American. Within 48 hours of this notification, the MLD would recommend to the lead agency her/his preferred treatment of the remains and associated grave goods.

3.6 Energy

Would the project:	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
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?	☐	☐	☒	☐

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 service providers, supply sources, and estimated consumption for electricity, natural gas, and petroleum is discussed below.

Energy Overview

Electricity

LADWP is the utility provider for the project site. LADWP provides electric services to 1.5 million customers, located in the City and in the Owens Valley. According to LADWP, customers consumed approximately 24 billion kilowatt-hours of electricity in 2016 (CEC 2018). LADWP receives electric power from a variety of sources. According to the LADWP Briefing Book 2017–2018, 29% of LADWP's power came from renewable energy sources in 2016, including biomass/waste, geothermal, small hydroelectric, solar, and wind sources (LADWP 2017). Due to the state's energy efficiency building standards and efficiency and conservation programs, California's electricity use per capita has remained stable for more than 30 years, while the national average has steadily increased (CEC 2015).

Natural Gas

Southern California Gas Company (SoCalGas) serves the City, including the project area. SoCalGas serves 21.6 million customers in a 20,000-square-mile service area that includes over 500 communities (SoCalGas 2018). In 2016 (the most recent year for which data is available), SoCalGas delivered 5,123 million therms of natural gas, with the majority going to residential uses. Demand for natural gas can vary depending on factors such as weather, price of electricity, the health of the economy, environmental regulations, energy-efficiency programs, and the availability of alternative renewable energy sources. Natural gas is available from a variety of in-state and out-of-state sources and is provided throughout the state in response to market supply and demand.

Petroleum

Transportation accounts for the majority of California's total energy consumption (CEC 2018). According to the EIA, California used approximately 683 million barrels of petroleum in 2017 (EIA 2019). This equates to a daily use of approximately 1.9 million barrels of petroleum. There are 42 U.S. gallons in a barrel, so California consumes approximately 78.6 million gallons of petroleum per day, adding up to an annual consumption of 29 billion gallons of petroleum. However, technological advances, market trends, consumer behavior, and government policies could result in significant changes in fuel consumption by type and in total. At the federal and state levels, various policies, rules, and regulations have been enacted to improve vehicle fuel efficiency, promote the development and use of alternative fuels, reduce transportation-source air pollutants and GHG emissions, and reduce vehicle miles traveled.

Construction

Electricity

Phase II asbestos and lead abatement would use negative-air machines that would consume electricity. It was assumed that 40 negative-air machines would be used for 24 hours per day. Electricity was estimated based on the kilowatt-hours (kWh) per day for each unit (Units 1, 2, 3, and 4) and the number of days of operation, which is 90 days for each unit. During Unit 1 abatement, electricity consumption was estimated to total 22,255 kWh (3,462 kWh in 2020 and 18,793 kWh in 2021). Unit 2 was estimated to require 22,555 kWh in 2021, and Units 3 and 4 were both estimated to require 27,554 kWh each in 2021. The total estimated electricity consumed by the negative-air machines during asbestos and lead abatement was estimated to be 99,619 kWh.

In addition to the negative-air machines, temporary electric power for as-necessary lighting and electronic equipment would be provided by LADWP. The amount of electricity used for temporary power would be minimal, because typical demand would stem from electrically powered hand tools.

Overall, the electricity used for construction activities would be temporary and minimal; therefore, project construction would not result in wasteful, inefficient, or unnecessary consumption of electricity.

Natural Gas

Natural gas is not anticipated to be required during construction of the project. Fuels used for construction would primarily consist of diesel and gasoline, which are discussed under the subsection "Petroleum." Any minor amounts of natural gas that may be consumed as a result of project construction would be temporary and negligible and would not have an adverse effect; therefore, project construction would not result in wasteful, inefficient, or unnecessary consumption of natural gas.

Petroleum

Heavy-duty construction equipment associated with construction activities for construction would rely on diesel fuel, as would vendor trucks involved in delivery of materials to the project site. Construction workers would travel to and from the project site throughout the duration of construction. It is assumed in this analysis that construction workers would travel in gasoline-powered light-duty vehicles.

Heavy-duty construction equipment of various types would be used during most phases of project construction. Appendix A lists the assumed equipment usage for each phase of construction. The project's construction equipment is estimated to operate a total combined 43,386 hours.

Fuel consumption from construction equipment was estimated by converting the total carbon dioxide (CO_2) emissions from each construction phase to gallons using the conversion factors for CO_2 to gallons of gasoline or diesel. Construction is estimated to occur in late 2020 through mid-2023 based on the construction phasing schedule.

The conversion factor for gasoline is 8.78 kilograms per metric ton CO_2 per gallon, and the conversion factor for diesel is 10.21 kilograms per metric ton CO_2 per gallon (The Climate Registry 2019). The estimated diesel fuel usage from construction equipment is shown in Table 4.

Table 4. Construction Equipment Diesel Demand

Phase	Pieces of Equipment	Equipment CO_2 (MT)	Kg CO_2/Gallon	Gallons
1A Phase I Demolition Preparatory Work	2	7.05	10.21	690.50
Equipment Delivery 1	0	0.00	10.21	0.00
1B-A Phase IB Temporary Equipment	0	0.00	10.21	0.00
2 Phase II Asbestos/Lead Abatement and Waste Removal	0	0.00	10.21	0.00
1B-B Phase IB Temporary Equipment	1	12.46	10.21	1,220.37
1B-C Phase IB Temporary Equipment	1	12.46	10.21	1,220.37
Equipment Delivery 2	0	0.00	10.21	0.00
3A Phase III Demolition of Outlying Structures	3	20.30	10.21	1,988.25
Crushing	1	565.31	10.21	55,368.27
3B Phase III Demolition of Outlying Structures	4	14.48	10.21	1,418.22
3C Phase III Demolition of Outlying Structures	6	60.18	10.21	5,894.22
4A Phase IV Demolition of Units	10	210.07	10.21	20,574.93
4B Phase IV Demolition of Units	2	90.79	10.21	8,892.26
4C Phase IV Demolition of Units	5	141.78	10.21	13,886.39
4D Phase IV Demolition of Units	2	88.88	10.21	8,705.19
4E Phase IV Demolition of Units	6	206.16	10.21	20,191.97
4F Phase IV Demolition of Units	10	234.39	10.21	22,956.90
4G Phase IV Demolition of Units	2	91.82	10.21	8,993.14
5A Phase V Below Grade Demolition	3	182.29	10.21	17,854.06
6 Phase VI Demolition Closing Work	8	312.66	10.21	30,622.92
4H Phase IV Demolition of Units	6	271.88	10.21	26,628.80
4I Phase IV Demolition of Units	5	140.03	10.21	13,714.99
4J Phase IV Demolition of Units	2	91.83	10.21	8,994.12
5B Phase V Below Grade Demolition	3	37.55	10.21	3,677.77
5C Phase V Below Grade Demolition	3	46.94	10.21	4,597.45
Equipment Return	0	0.00	10.21	0.00
			Total	**278,091.09**

Sources: Pieces of equipment and equipment CO_2 (Appendix E); kg CO_2/Gallon (The Climate Registry 2019).
Notes: CO_2 = carbon dioxide; MT = metric ton; kg = kilogram.

Fuel estimates for total worker, vendor, and haul truck fuel consumption are provided in Table 5.

Table 5. Construction Worker, Vendor, and Haul Truck Petroleum Demand

Phase	Trips	Vehicle MT CO_2	Kg CO_2/ Gallon	Gallons
Worker Vehicles (Gasoline)				
1A Phase I Demolition Preparatory Work	20	5.52	8.78	628.70
Equipment Delivery 1	0	0.00	8.78	0.00
1B-A Phase IB Temporary Equipment	0	0.00	8.78	0.00
2 Phase II Asbestos/Lead Abatement and Waste Removal	36	27.70	8.78	3,154.90
1B-B Phase IB Temporary Equipment	4	1.29	8.78	146.92
1B-C Phase IB Temporary Equipment	4	1.29	8.78	146.92
Equipment Delivery 2	0	0.00	8.78	0.00
3A Phase III Demolition of Outlying Structures	28	2.77	8.78	315.49
Crushing	4	8.73	8.78	994.31
3B Phase III Demolition of Outlying Structures	36	2.67	8.78	304.10
3C Phase III Demolition of Outlying Structures	44	7.62	8.78	867.88
4A Phase IV Demolition of Units	76	22.38	8.78	2,548.97
4B Phase IV Demolition of Units	26	11.19	8.78	1,274.49
4C Phase IV Demolition of Units	46	17.79	8.78	2,026.20
4D Phase IV Demolition of Units	26	11.05	8.78	1,258.54
4E Phase IV Demolition of Units	48	20.85	8.78	2,374.72
4F Phase IV Demolition of Units	76	22.13	8.78	2,520.50
4G Phase IV Demolition of Units	26	11.17	8.78	1,272.21
5A Phase V Below Grade Demolition	30	28.25	8.78	3,217.54
6 Phase VI Demolition Closing Work	44	44.47	8.78	5,064.92
4H Phase IV Demolition of Units	48	27.25	8.78	3,103.64
4I Phase IV Demolition of Units	46	17.57	8.78	2,001.14
4J Phase IV Demolition of Units	26	11.10	8.78	1,264.24
5B Phase V Below Grade Demolition	28	5.15	8.78	586.56
5C Phase V Below Grade Demolition	28	6.44	8.78	733.49
Equipment Return	0	0.00	8.78	0.00
			Total	**35,806.38**
Vendor Trucks (Diesel)				
1A Phase I Demolition Preparatory Work	6	3.24	10.21	317.34
Equipment Delivery 1	0	0.00	10.21	0.00
1B-A Phase IB Temporary Equipment	0	0.00	10.21	0.00
2 Phase II Asbestos/Lead Abatement and Waste Removal	0	0.00	10.21	0.00
1B-B Phase IB Temporary Equipment	0	0.00	10.21	0.00
1B-C Phase IB Temporary Equipment	0	0.00	10.21	0.00

Table 5. Construction Worker, Vendor, and Haul Truck Petroleum Demand

Phase	Trips	Vehicle MT CO_2	Kg CO_2/ Gallon	Gallons
Equipment Delivery 2	0	0.00	10.21	0.00
3A Phase III Demolition of Outlying Structures	0	0.00	10.21	0.00
Crushing	0	0.00	10.21	0.00
3B Phase III Demolition of Outlying Structures	0	0.00	10.21	0.00
3C Phase III Demolition of Outlying Structures	0	0.00	10.21	0.00
4A Phase IV Demolition of Units	0	0.00	10.21	0.00
4B Phase IV Demolition of Units	0	0.00	10.21	0.00
4C Phase IV Demolition of Units	0	0.00	10.21	0.00
4D Phase IV Demolition of Units	0	0.00	10.21	0.00
4E Phase IV Demolition of Units	0	0.00	10.21	0.00
4F Phase IV Demolition of Units	0	0.00	10.21	0.00
4G Phase IV Demolition of Units	0	0.00	10.21	0.00
5A Phase V Below Grade Demolition	0	0.00	10.21	0.00
6 Phase VI Demolition Closing Work	4	8.27	10.21	809.99
4H Phase IV Demolition of Units	0	0.00	10.21	0.00
4I Phase IV Demolition of Units	0	0.00	10.21	0.00
4J Phase IV Demolition of Units	0	0.00	10.21	0.00
5B Phase V Below Grade Demolition	0	0.00	10.21	0.00
5C Phase V Below Grade Demolition	0	0.00	10.21	0.00
Equipment Return	0	0.00	10.21	0.00
			Total	**1,127.33**
Haul Trucks (Diesel)				
1A Phase I Demolition Preparatory Work	0	0.00	10.21	0.00
Equipment Delivery 1	4	0.33	10.21	32.32
1B-A Phase IB Temporary Equipment	254	2.53	10.21	32.32
2 Phase II Asbestos/Lead Abatement and Waste Removal	306	18.32	10.21	1,794.32
1B-B Phase IB Temporary Equipment	4	1.18	10.21	115.57
1B-C Phase IB Temporary Equipment	26	2.29	10.21	224.29
Equipment Delivery 2	38	3.09	10.21	302.64
3A Phase III Demolition of Outlying Structures	268	2.21	10.21	216.45
Crushing	0	0.00	10.21	0.00
3B Phase III Demolition of Outlying Structures	96	0.79	10.21	77.38
3C Phase III Demolition of Outlying Structures	6	0.05	10.21	4.90
4A Phase IV Demolition of Units	1,000	8.23	10.21	806.07
4B Phase IV Demolition of Units	638	5.22	10.21	511.26

Table 5. Construction Worker, Vendor, and Haul Truck Petroleum Demand

Phase	Trips	Vehicle MT CO_2	Kg CO_2/ Gallon	Gallons
4C Phase IV Demolition of Units	22	0.18	10.21	17.63
4D Phase IV Demolition of Units	638	5.21	10.21	510.28
4E Phase IV Demolition of Units	956	7.81	10.21	764.94
4F Phase IV Demolition of Units	1,174	9.59	10.21	939.28
4G Phase IV Demolition of Units	1,078	8.80	10.21	861.90
5A Phase V Below Grade Demolition	282	2.26	10.21	221.35
6 Phase VI Demolition Closing Work	0	0.00	10.21	0.00
4H Phase IV Demolition of Units	1,616	13.06	10.21	1,279.14
4I Phase IV Demolition of Units	22	0.18	10.21	17.63
4J Phase IV Demolition of Units	1,078	8.74	10.21	856.02
5B Phase V Below Grade Demolition	92	0.72	10.21	70.52
5C Phase V Below Grade Demolition	8	0.06	10.21	5.88
Equipment Return	42	3.24	10.21	317.34
			Total	**9,801.18**

Sources: Trips and vehicle CO_2 (Appendix E); kg CO_2/Gallon (The Climate Registry 2019).
Notes: MT = metric ton; CO_2 = carbon dioxide; kg = kilogram.

In summary, construction of the project is conservatively anticipated to consume 35,806 gallons of gasoline and 289,020 gallons of diesel over a period of approximately 31 months. For context, approximately 52.4 billion gallons of petroleum will likely be consumed in California over the course of the project's construction phase, based on the California daily petroleum consumption estimate of approximately 78.6 million gallons per day (EIA 2019). Overall, because petroleum use during construction would be temporary, and would not be wasteful or inefficient, impacts would be less than significant.

Operational

Electricity, Natural Gas, Petroleum

The project would not include operational activities; therefore, the project would not consume energy following construction. The temporary buildings are anticipated to generate the same amount of energy as the existing permanent structures, and no net change would occur. No operational energy impact would occur.

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

Less-Than-Significant Impact. The project would follow applicable energy standards and regulations during construction activities. In addition, the project would not include building of permanent structures that would

need to comply with applicable regulations at the time of maintenance activities. Manufactured and modular buildings are regulated under federal (CFR Title 24) and California (CCR Title 25) regulations, including Part 6 of the California Energy Code and related energy portions of the CALGreen Code, Part 11 (California Department of Housing and Community Development 2014). Accordingly, the temporary buildings would be required to comply with applicable energy efficiency requirements when manufactured, and no conflict with applicable energy efficiency plans would occur. As such, impacts related to the project's potential to conflict with plans for renewable energy and energy efficiency would be less than significant.

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3.7 Geology and Soils

Would the project:	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
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 waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

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.

No Impact. The closest active earthquake fault near VGS is the San Fernando Fault, which is located to the north and east of the project site. The portion of the fault closest to the project area is approximately 3 miles northeast of the site (CGS 2019). Portions of this fault, including the section nearest to the project site, are contained within an Alquist-Priolo Earthquake Fault Zone. The California Geological Survey (formerly the California Division of Mines and Geology) has established Alquist-Priolo Special Study Zones around faults identified by the State Geologist as being active. The Alquist-Priolo Special Studies Zone Act limits development along the surface trace of active faults to reduce the potential for structural damage and/or injury due to fault rupture. However, no active or potentially active faults are known to underlie the site. The nearest potentially active (i.e., late Quaternary) fault is the Verdugo Fault, located approximately 1,000 feet southwest of Units 1–4, along San Fernando Road (CGS 2007, 2010). In addition, the project would not result in activation of these nearby faults. Therefore, the project would not directly or indirectly cause potential adverse effects involving rupture of a known earthquake fault, and no impacts would occur.

ii) Strong seismic ground shaking?

Less-Than-Significant Impact. VGS is located within the seismically active Southern California region and, as with all locations within the area, is potentially subject to strong seismically induced ground shaking. The closest active earthquake fault near VGS is the San Fernando Fault, which is located approximately 3 miles northeast of the project site. The project would include the removal of Units 1–4 and associated structures and systems, the bearing cooling tower foundation and skim pond north of the units, and four concrete foundations of demolished cooling towers within the existing VGS property boundaries. The project does not propose the construction of new structures. As such, the project would not exacerbate the potential for strong seismic ground shaking to occur, or expose additional people or structures to strong seismic ground shaking. Therefore, the project would not directly or indirectly cause potential adverse effects involving strong seismic ground shaking, and no impact would occur.

iii) Seismic-related ground failure, including liquefaction?

No Impact. VGS would not be subject to seismic-related ground failure related to liquefaction (CGS 2019). The California Geological Survey indicates that the project site is not located within an area where historic occurrence of liquefaction, or local geological, geotechnical, and groundwater conditions indicate a potential for permanent ground displacements such that mitigation would be required (DOC 1997). Additionally, the project would not increase the potential for seismic-related ground failure, including liquefaction, to occur. As a result, the project would not directly or indirectly cause potential adverse effects involving liquefaction, and no impact would occur.

iv) Landslides?

Less-Than-Significant Impact. Two areas within the VGS site are potential areas of seismically induced landslides (CGS 1998). Both landslide zones reside within a gravel pit area that is located in the northwest portion of the VGS property. However, the demolition areas are located on flat topography south and southeast of the gravel pit and do not fall within the landslide zone boundaries. As a result, the project would not directly or indirectly cause potential adverse effects involving landslides, and impacts would be less than significant.

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

Less-Than-Significant Impact. The project would involve the demolition and removal of Units 1–4 and associated structures and systems, the bearing cooling tower foundation and skim pond north of the units, and four concrete foundations of demolished cooling towers within the existing VGS property boundaries.

The project site is located in an area that has been substantially altered by prior grading, excavations, and construction. Demolition and excavation activities would result in temporary soil disturbance. However, demolition activities would comply with all applicable state and local regulations for erosion control. The project site is greater than 1 acre and would be subject to NPDES General Construction Permit requirements. Demolition activities would be required to incorporate various temporary BMPs designed to prevent erosion and siltation during demolition and excavation activities. Therefore, short-term demolition impacts associated with erosion would be less than significant.

Once demolition and excavation activities are completed, the project site would be primarily backfilled to grade with crushed concrete, and there would be no exposure of soils on site such that substantial soil erosion or loss of topsoil would occur. Therefore, long-term demolition impacts associated with erosion 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 previously discussed (Section 3.7 [a][i] and [a][iii]), the site could be subject to strong seismically induced ground movement due to its location in Southern California. Additionally, the California Geological Survey indicates that the project site is not located within an area where historic occurrence of liquefaction, or local geological, geotechnical, and groundwater conditions indicate a potential for permanent ground displacements such that mitigation would be required (DOC 1997). Due to the nature of the project being the demolition of existing structures with no new permanent structures proposed, there would be no potential for future structural collapse. The proposed demolition and removal of Units 1–4 and associated structures and systems, the bearing cooling tower foundation, the skim pond, and four concrete foundations of demolished cooling towers would not initiate landslides, lateral spreading, subsidence, liquefaction, or collapse. As a result, 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. The project site is located in an area that has been substantially altered by prior grading, excavations, and construction. The site contains Palmview and Tujunga soil in the form of alluvial deposits in the western half of the site area and Soboba soil in the form of alluvial deposits in the eastern half of the site area, which are not expansive (USDA 2019). Further, the project would not include construction of new permanent buildings, the foundations of which could be adversely impacted by expansive soil. Therefore, no impact would occur.

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

No Impact. The project would involve the demolition of Units 1–4 and associated structures and systems, the bearing cooling tower foundation and skim pond north of the units, and four concrete foundations of demolished cooling towers within the existing VGS property boundaries. Additionally, the project would not permanently increase the number of personnel on site or require an expansion of an existing wastewater treatment facility for sanitary waste purposes. No septic tanks or alternative wastewater disposal system would be included as part of the project. Therefore, no impact would occur.

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

Less-Than-Significant Impact with Mitigation Incorporated. The project lies within the San Fernando Valley, which is bound to the north by the Santa Susana thrust and Sierra Madre fault, to the south by the Santa Monica

Mountains, to the east by the Verdugo Mountains, and to the west by the Simi Hills (Langenheim et al. 2011). The majority of the San Fernando Valley is underlain by recent alluvium derived from the surrounding uplifted areas.

No paleontological resources were identified as a result of the Natural History Museum of Los Angeles County paleontological records search or desktop research for the project; however numerous fossil localities are known from the San Fernando Basin, with several near the project site. Recent young alluvial fan deposits that are generally too young to contain significant paleontological resources on or very near the surface immediately underlie the project site. However, at depths greater than five feet below the original surface, there is a greater likelihood of encountering sediments that are old enough to contain significant paleontological resources. Given these factors, the likelihood of impacting paleontological resources within the project site is considered low above a depth of 5 feet below the original ground surface, increasing with depth. In the event that excavation activities would reach depths greater than 5 feet below the artificial fill material, the likelihood of inadvertent discoveries of paleontological resources would increase and therefore mitigation is required. With implementation of MM-GEO-1, impacts associated with paleontological resources would be less than significant.

MM-GEO-1 If excavations below a depth of five feet below the original ground surface (i.e., 5 feet below the depth of documented artificial fill) are planned; a qualified paleontologist meeting the Society of Vertebrate Paleontology (SVP 2010) standards should be retained to determine when and where paleontological monitoring is warranted. The qualified paleontologist or a qualified paleontological monitor meeting the SVP (2010) standards under the direction of the qualified paleontologist shall conduct the paleontological monitoring. If the sediments are determined by the qualified paleontologist to be too young or too coarse-grained to likely preserve paleontological resources, the qualified paleontologist can reduce or terminate monitoring per the SVP (2010) guidelines and based on the excavations remaining for the project.

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3.8 Greenhouse Gas Emissions

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

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

Less-Than-Significant Impact. Climate change refers to any significant change in measures of climate, such as temperature, precipitation, or wind patterns, lasting for an extended period of time (decades or longer). The Earth's temperature depends on the balance between energy entering and leaving the planet's system, and many factors (natural and human) can cause changes in Earth's energy balance. The greenhouse effect is the trapping

and build-up of heat in the atmosphere (troposphere) near the Earth's surface. The greenhouse effect is a natural process that contributes to regulating the Earth's temperature, and it creates a livable environment on Earth. Human activities that emit additional GHGs to the atmosphere increase the amount of infrared radiation that gets absorbed before escaping into space, thus enhancing the greenhouse effect and causing the Earth's surface temperature to rise. Global climate change is a cumulative impact; a project contributes to this impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. Thus, GHG impacts are recognized exclusively as cumulative impacts (CAPCOA 2008).

A GHG is any gas that absorbs infrared radiation in the atmosphere; in other words, GHGs trap heat in the atmosphere. As defined in California Health and Safety Code Section 38505(g) for purposes of administering many of the state's primary GHG emissions reduction programs, GHGs include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3) (see also 14 CCR 15364.5). The three GHGs evaluated herein are CO_2, CH_4, and N_2O. Emissions of HFCs, PFCs, SF_6, and NF_3 are generally associated with industrial activities including the manufacturing of electrical components, heavy-duty air conditioning units, and insulation of electrical transmission equipment (substations, power lines, and switch gears.). Therefore, emissions of these GHGs were not evaluated or estimated in this analysis because the project would not include these activities or components and would not generate HFCs, PFCs, SF_6, and NF_3 in measurable quantities.

Gases in the atmosphere can contribute to climate change both directly and indirectly.[15] The Intergovernmental Panel on Climate Change developed the global warming potential (GWP) concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The reference gas used is CO_2; therefore, GWP-weighted emissions are measured in metric tons of CO_2 equivalent (MT CO_2e). Consistent with CalEEMod Version 2016.3.2, this GHG emissions analysis assumed the GWP for CH_4 is 25 (emissions of 1 MT of CH_4 are equivalent to emissions of 25 MT of CO_2), and the GWP for N_2O is 298, based on the Intergovernmental Panel on Climate Change Fourth Assessment Report (IPCC 2007).

As discussed in Section 3.3 of this IS/MND, the project is located within the jurisdictional boundaries of the SCAQMD. In October 2008, the SCAQMD proposed recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of residential and commercial development projects as presented in its *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold* (SCAQMD 2008). This document, which builds on the previous guidance prepared by the California Air Pollution Control Officers Association, explored various approaches for establishing a significance threshold for GHG emissions. The draft interim CEQA thresholds guidance document was not

[15] Direct effects occur when the gas itself absorbs radiation. Indirect radiative forcing occurs when chemical transformations of the substance produce other GHGs, when a gas influences the atmospheric lifetimes of other gases, and/or when a gas affects atmospheric processes that alter the radiative balance of the Earth (e.g., affect cloud formation or albedo) (EPA 2017).

adopted or approved by the Governing Board. However, in December 2008, the SCAQMD adopted an interim 10,000 MT CO_2e per-year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency (see SCAQMD Resolution No. 08-35, December 5, 2008).

The SCAQMD formed a GHG CEQA Significance Threshold Working Group to work with SCAQMD staff on developing GHG CEQA significance thresholds until statewide significance thresholds or guidelines are established. From December 2008 to September 2010, the SCAQMD hosted working group meetings and revised the draft threshold proposal several times, although it did not officially provide these proposals in a subsequent document. The SCAQMD has continued to consider adoption of significance thresholds for residential and general land use development projects. The most recent proposal, issued in September 2010, uses the following tiered approach to evaluate potential GHG impacts from various uses (SCAQMD 2010):

Tier 1. Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.

Tier 2. Consider whether or not the proposed project is consistent with a locally adopted GHG reduction plan that has gone through public hearing and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.

Tier 3. Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 MT CO_2e per-year threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 MT CO_2e per year), commercial projects (1,400 MT CO_2e per year), and mixed-use projects (3,000 MT CO_2e per year). Under option 2, a single numerical screening threshold of 3,000 MT CO_2e per year would be used for all non-industrial projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.

Tier 4. Consider whether the project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of Assembly Bill (AB) 32 to reduce statewide GHG emissions to 1990 levels by 2020. The 2020 efficiency targets are 4.8 MT CO_2e per-service population for project-level analyses and 6.6 MT CO_2e per-service population for plan-level analyses. If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.

Tier 5. Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.

Section 15064.7(c) of the CEQA Guidelines specifies that "[w]hen adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by

substantial evidence." The CEQA Guidelines do not prescribe specific methodologies for performing an assessment, establish specific thresholds of significance, or mandate specific mitigation measures. Rather, the CEQA Guidelines emphasize the lead agency's discretion to determine the appropriate methodologies and thresholds of significance that are consistent with the manner in which other impact areas are handled in CEQA (CNRA 2009).

To determine the project's potential to generate GHG emissions that would have a significant impact on the environment, the project's GHG emissions were compared to the non-industrial land project quantitative threshold of 3,000 MT CO_2e per year. Because the project does not include operational sources of emissions, and because the project does not conform to the standard land use types, the 3,000 MT CO_2e per year threshold, which was identified under Tier 3 Option 1, was applied herein. Per the SCAQMD guidance, construction emissions should be amortized over the operational life of the project, which is assumed to be 30 years (SCAQMD 2008). This impact analysis, therefore, compares amortized construction emissions to the proposed SCAQMD threshold of 3,000 MT CO_2e per year.

Construction (Demolition) Emissions

Construction of the project would result in GHG emissions primarily associated with the use of off-road construction equipment, on-road trucks, and worker vehicles. Table 1 and Appendix A provide a depiction of expected construction schedules (including information regarding phasing, equipment used during each phase, truck trips, and worker vehicle trips) assumed for the purposes of emissions estimation. In addition to the diesel-fueled equipment and vehicles presented in Table 1, which were modeled using CalEEMod, the construction GHG emissions analysis also includes GHG emissions from electric equipment, specifically the negative-air machines used during Phase II asbestos and lead abatement. The estimated electricity consumed in kilowatt-hours per day for Units 1, 2, 3, and 4 was used to estimate the annual kilowatt-hours consumed, which was converted to megawatt-hours per year and then multiplied by the GHG carbon intensity factor in mega-watts per year for the local electricity utility provider, which is LADWP. The intensity factors for CO_2, CH_4, and N_2O were based on information provided by LADWP for 2019(LADWP 2020). On-site sources of GHG emissions include off-road equipment; off-site sources include trucks and worker vehicles. Table 6 presents construction GHG emissions for the project from on-site and off-site emissions sources.

Table 6. Estimated Annual Construction Greenhouse Gas Emissions

Year	CO_2	CH_4	N_2O	CO_2e
	Metric Tons per Year			
2020 – CalEEMod	20.32	0.00	0.00	20.40
2020 – Negative-air machines	1.08	0.00	0.00	1.09
2020 Subtotal	*21.40*	*0.00*	*0.00*	*22.48*
2021 – CalEEMod	526.97	0.10	0.00	529.53
2021 – Negative-air machines	30.10	0.00	0.00	30.24
2021 Subtotal	*526.97*	*0.10*	*0.00*	*559.77*

Table 6. Estimated Annual Construction Greenhouse Gas Emissions

Year	CO_2	CH_4	N_2O	CO_2e
	Metric Tons per Year			
2022	2,153.40	0.53	0.00	2,116.78
2023	516.02	0.12	0.00	519.08
Total	**3,247.89**	**0.75**	**0.00**	**3,217.11**
			Amortized Construction Emissions	**107.24**

Source: See Appendix A for complete results.
Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalent.
While construction of the project is anticipated to start in fall 2021, the analysis assumes a construction start date of October 2020, which represents a worst-case scenario for criteria air pollutant and GHG emissions because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.

As shown in Table 6, the estimated annual total GHG emissions in 2020, 2021, 2022, and 2023 would be approximately 21 MT CO_2e, 530 MT CO_2e, 2,117 MT CO_2e, and 519 MT CO_2e, respectively, for a total of 3,217 MT CO_2e. Amortized over 30 years, total construction GHG emissions would be approximately 107 MT CO_2e per year. In addition, as with project-generated construction criteria air pollutant emissions, GHG emissions generated during proposed construction activities would be short term, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions.

Operational Emissions

Once project construction is complete, no operational activities associated with the proposed project would occur (no routine daily equipment operation or vehicle trips would be required). The temporary buildings are anticipated to generate the same GHG emissions as the existing permanent structures, and no net change would occur. Because the project would not result in any long-term operational activities, there would be no potential GHG emissions impacts associated with operational GHG emissions.

As shown in Table 6, amortized project-generated construction emissions would not exceed the 3,000 SCAQMD threshold. Therefore, GHG emissions impacts would be less than significant.

b) 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 result in less-than-significant impacts related to conflicts with GHG emission reduction plans, for the reasons described as follows.

Consistency with CARB's Scoping Plan

The CARB Scoping Plan, approved by CARB in 2008 and updated in 2014 and 2017, provides a framework for actions to reduce California's GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. The Scoping Plan is not directly applicable to specific projects, nor is it intended to be used for project-level evaluations.[16] Under the Scoping Plan, however, there are several state regulatory measures aimed at the identification and reduction of GHG emissions. CARB and other state agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage, high-GWP GHGs in consumer products) and changes to the vehicle fleet (i.e., hybrid, electric, and more fuel-efficient vehicles) and associated fuels (e.g., Low Carbon Fuel Standard), among others. Nonetheless, the project would comply with various GHG emission reduction regulations to the extent they apply to the project's emissions sources.

Consistency with the Southern California Association of Governments 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy

SCAG's 2016 RTP/SCS is a regional growth-management strategy that targets per capita GHG reduction from passenger vehicles and light-duty trucks in the Southern California region. The 2016 RTP/SCS incorporates local land use projections and circulation networks in city and county general plans. The 2016 RTP/SCS is not directly applicable to the project because the purpose of the 2016 RTP/SCS is to provide direction and guidance by making the best transportation and land use choices for future development. The proposed project would not conflict with implementation of the strategies identified in the 2016 RTP/SCS that would reduce GHG emissions.

Consistency with Senate Bill 32 and Executive Order S-3-05

The project would not impede the attainment of the GHG reduction goals for 2030 or 2050 identified in SB 32 and Executive Order S-3-05, respectively. Executive Order S-3-05 establishes the following goals: GHG emissions should be reduced to 2000 levels by 2010, to 1990 levels by 2020, and to 80% below 1990 levels by 2050. SB 32 establishes a statewide GHG emissions reduction target whereby CARB, in adopting rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions, shall ensure that statewide GHG emissions are reduced to at least 40% below 1990 levels by December 31, 2030. While there are no established protocols or thresholds of significance for that future year analysis, CARB forecasts that compliance with the current Scoping Plan puts the state on a trajectory of meeting these long-term GHG goals, although the specific path to compliance is unknown (CARB 2014).

[16] The Final Statement of Reasons for the amendments to the CEQA Guidelines reiterates the statement in the Initial Statement of Reasons that "[t]he Scoping Plan may not be appropriate for use in determining the significance of individual projects because it is conceptual at this stage and relies on the future development of regulations to implement the strategies identified in the Scoping Plan" (CNRA 2009).

CARB has expressed optimism with regard to both the 2030 and 2050 goals. It states in the First Update to the Climate Change Scoping Plan that "California is on track to meet the near-term 2020 GHG emissions limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32" (CARB 2014). With regard to the 2050 target for reducing GHG emissions to 80% below 1990 levels, the First Update to the Climate Change Scoping Plan states that the level of reduction is achievable in California (CARB 2014). CARB believes that the state is on a trajectory to meet the 2030 and 2050 GHG reduction targets set forth in AB 32, SB 32, and Executive Order S-3-05. This is confirmed in the *2017 Scoping Plan*, which states (CARB 2017):

> The Scoping Plan builds upon the successful framework established by the Initial Scoping Plan and First Update, while identifying new, technologically feasible and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health, including in disadvantaged communities.

The project would not interfere with implementation of any of the previously described GHG reduction goals for 2030 or 2050 because the project would not exceed the SCAQMD's recommended threshold of 3,000 MT CO_2e per year (SCAQMD 2008). Because the project would not exceed the threshold, this analysis provides support for the conclusion that the project would not impede the state's trajectory toward the previously described statewide GHG reduction goals for 2030 or 2050.

The project's consistency with the state's Scoping Plan would assist in meeting the City's contribution to GHG emission reduction targets in California. With respect to future GHG targets under SB 32 and Executive Order S-3-05, CARB has also made clear its legal interpretation that it has the requisite authority to adopt whatever regulations are necessary, beyond the AB 32 horizon year of 2020, to meet the SB 32 40% reduction target by 2030 and the Executive Order S-3-05 80% reduction target by 2050. This legal interpretation by an expert agency provides evidence that future regulations will be adopted to continue the trajectory toward meeting these future GHG targets.

Based on the considerations previously outlined, the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. This impact would be less than significant.

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3.9 Hazards and Hazardous Materials

Would the project:	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☒	☐	☐
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?	☐	☒	☐	☐

Would the project:	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
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 that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
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?	☐	☐	☐	☒

In addition to a brief site visit, various resources were utilized to obtain information regarding past and current activities and chemical use on the project site. Resources reviewed include historical aerial photographs of the project site; VGS files obtained from the Los Angeles Fire Department; the Department of Toxic Substances Control (DTSC) and RWQCB files on the Envirostor and Geotracker websites; files obtained from LADWP; and the Environmental Data Resources (EDR) agency database search report.

As shown on Figure 2, the project site is made up of three demolition areas within the VGS property: the northern area, Units 1–4, and the former cooling tower area.

- The northern area is located adjacent to a large gravel pit that was used for wastewater disposal for the VGS. The northern area includes a skim pond associated with the wastewater disposal and a former bearing cooling tower (the foundation remains).

- Units 1–4 include the following features: an oil-water separator, a weld shop, four abandoned fuel underground storage tanks (USTs), former paint and phosphate storage areas, transformers, various former aboveground oil and grease tanks, former acid tanks, oil sumps, trenches, and ground wells.
- The former cooling tower area, located southeast of Units 1–4, consists of four cooling tower foundations and former sulfuric acid tanks.

3.9.1 Historical Aerial Photograph Review

Historical aerial photographs from EDR were reviewed for 1928, 1938, 1948, 1952, 1954, 1964, 1969, 1971, 1977, 1983, 1991, 2002, 2005, 2009, 2012, and 2016 (Appendix D-1). Additionally, historical aerial photographs from 1967 and 2010 that were included in the 2019 Current Conditions Report (LAWDP 2019) were also evaluated. Observations are presented in Table 7.

Table 7. Observations from Aerial Photograph Review

Date	Description
1928	The Tujunga wash appears to be flowing east–west, approximately 900 feet to the northwest of the project site. A gravel pit appears adjacent to the project site to the northwest. The project site appears mostly vacant, except for a few residential-sized buildings near the western portion of the project site. The central portion of the project site has been disturbed, but clear agricultural use is not apparent. Agricultural and residential properties are visible in the surrounding area.
1938 1948	The project site and surrounding area appear similar to the 1928 aerial photograph.
1952	The project site appears to have been graded, with construction of the Valley Generating Station underway on the western portion of the project site.
1954	The Valley Generating Station appears to be under construction, with all areas other than the eastern portion of the project site under construction or built. Other areas of the Valley Generating Station located northeast of the project site have been built or are under construction. The canal along the Tujunga wash appears to be developed, with the Hansen Spreading Grounds located farther north of the canal.
1964 1967 1969 1971 1977	Construction of the Valley Generating Station appears to be complete. The pit adjacent to the project site to the northwest appears to be filled with water. A rail spur appears to the north of Units 1–4. The area approximately 0.2 miles southeast of the project site appears to be cleared of buildings and excavated as a gravel pit, the eastern-most portion of which was used as a landfill.
1983 1989 1994	The project site appears similar to the prior photograph. The landfill to the southeast has expanded west, where the large gravel pit was formerly located.
2002	The four Valley Generating Station cooling tower structures to the northeast of the project site appear to be removed, the area appears to be graded.
2005	New Units 5–8 are developed northeast of the project site.

Table 7. Observations from Aerial Photograph Review

Date	Description
2009	A new tank is constructed in the tank farm adjacent to the project site.
2010 2012 2016	No apparent changes are observed on the project site compared to 2009 aerial photograph. The landfill to the southeast was completed with a vegetative cover between 2010 and 2012.

The aerial photographs indicate that the gravel pit immediately north and west of the project site was mined prior to 1928. The VGS was built in the 1950s. In the early 2000s, four cooling towers were removed and were replaced with Units 5–8. The VGS is located south of the Hansen Spreading Grounds and north of the Bradley Landfill.

3.9.2 Los Angeles Fire Department Records

Dudek requested hazardous-materials and underground and aboveground storage tank (AST) files for LADWP VGS from the Los Angeles Fire Department Certified Unified Program Agency. The Los Angeles Fire Department responded on October 21, 2019, with records pertaining to the site USTs, AST, and hazardous materials storage, as well as hazardous materials inspections. Review of these records are described below (Appendix D-2):

- Inspection reports for site USTs and for hazardous materials storage from 2015–2018 were reviewed. The 2015 inspection reports indicated minor inspection, testing, and administrative violations. The September 2016 inspection report did not indicate any violations and noted that the site was in progress to abandon USTs in place. The April 2018 inspection report did not indicate any violations and noted that the tanks were abandoned. The review of inspection records did not indicate the release or spill of hazardous substances into the environment or subsurface environment of the project site.
- The tank abandonment worksheet (dated March 27, 2017) indicated that four metal 60,000-gallon USTs containing heavy fuel oil were abandoned in place by using 240,000 gallons of slurry fill. The tanks were certified clean. According to the LADWP, the LAFD's tank abandonment worksheet contains inaccurate information about the tank sizes. The LADWP stated that their records indicate that two of the tanks were 272,350 gallons and two were 192,638 gallons (LADWP 2020). As further discussed in Section 3.9.4, the LADWP provided the October 5, 2016, TetraTech UST Abandonment Soil Report for these four USTs. The report indicates that the four USTs were decommissioned in 2003. The tanks were cleaned in 2008, filled with approximately 980,000 gallons of slurry, and piping was disconnected and flushed at that time. The tanks extended from the ground surface to 12 feet bgs. The majority of the associated piping was aboveground, with an approximately 60-foot section of underground piping located adjacent to the northern project site area. The abandoned tanks are located within the Units 1–4 area of the project site.
- A total of 25 soil samples were collected beneath the tanks through holes cut in the bottom of the tanks (TetraTech 2016). Soil samples were also collected adjacent to piping. No VOCs were detected in any of the soil samples. Total petroleum hydrocarbons (TPH) were detected in all soil samples collected beneath Tank 3

and the northern end of the buried pipeline segment. The concentrations of TPH beneath the pipeline segment were below regulatory screening levels. The concentrations of diesel-range TPH beneath Tank 3 exceeded regulatory screening levels (up to 6,510 milligrams per kilogram); however, the concentrations decrease with depth (between 1 and 5 feet below the tank). No elevated lead concentrations were detected (all concentrations were below regulatory screening criteria).

- A letter from the RWQCB granted no further action for the UST closure in January 2017. Residual contamination exists beneath Tank 3.
- A notification of change in status application from 2010 indicated that the facility stored 2,365,600 gallons of petroleum products (including fuel oil and turbo oil). The tanks are in secondary containment. A list of hazardous chemicals stored at the VGS facility were also listed, which included nitrogen, low sulfur fuel oil, waste oil, mineral oil, carbon monoxide, paint thinner, argon, acetylene, sulfuric acid, mercury, methane, ethylene diamine, unleaded gasoline, 1,1,1-trichloroethane, liquefied propane, among other chemicals; many of these in ASTs. This inventory is understood to be for the entire VGS facility. Based on a chemical inventory provided to Dudek by LADWP, the following chemicals and hazardous materials have been stored on the project site recently: turbine oil, mineral oil, sodium hexametaphosphate, kerosene, hydraulic fluid, and aqua ammonia. Sulfuric acid is also known to have been stored within the project area. According to the LADWP, mineral oil, sodium hexametaphosphate, kerosene, hydraulic fluid, and aqua ammonia are still present within the project area. Additionally, based on discussion with LADWP personnel (see Section 3.9.5), oil may be present in pipelines and sumps on the project site.

The records reviewed indicate the presence of TPH-impacted soils at the project site. Additionally, the files note the former presence of chemical and waste storage in many ASTs and drums. The storage locations for some chemicals are not noted in the files; however, it is known that mineral oil, sodium hexametaphosphate, kerosene, hydraulic fluid, and aqua ammonia are still present within the project area.

3.9.3 Envirostor and Geotracker Online Records

The DTSC currently oversees an open release case associated with the gravel pit located immediately north and west of the project site (the gravel pit site overlaps a portion of the northern project site area). Wastewater from the VGS was discharged into the gravel pit beginning in the mid-1950s (MBA 1993). Wastewater discharged to the gravel pit included boiler blowdown, boiler dust collector wash, oil-water separator wastewater, oil ash, and equipment cleaning solution (MBA 1993). Available information from the 1970s indicates that an average of 25 million gallons of industrial wastewater were discharged each year. In 1978, industrial wastewater other than boiler blowdown was discharged to the sewer. Boiler blowdown was discharged to the gravel pit until at least the mid-1980s, while oil ash and boiler cleaning waste were then disposed of at a Class I landfill (MBA 1993). Stormwater runoff from the VGS was also discharged into the gravel pit.

The gravel pit has been the subject of past soil, soil vapor, and groundwater sampling. The data indicate the presence of metals, polychlorinated biphenyls (PCBs), and semi-volatile organic compound (SVOC)-impacted soils. The DTSC

recommended evaluation of surface soils outside of the gravel pit (along the rim of the gravel pit and along the former rail spur; some of these areas overlap the project site areas) for potential contaminants (DTSC 2019a). The U.S. Environmental Protection Agency (USEPA), however, is pursuing further sampling at the VGS site (in areas outside of the gravel pit) due to the PCB detections in the gravel pit and at the adjacent Truesdale Center site (USEPA 2016).

Based on the Revised 2019 Current Conditions Report (LADWP 2019), the following sampling has been conducted to date within the project site in association with the gravel pit investigations;

- Samples were collected from four soil borings at depths down to 30 feet bgs from the northern project area (LADWP 2019). The samples were analyzed for metals and PCBs; concentrations from the northern project area were below regulatory screening levels for the commercial scenario or background levels.
- No known sampling has been conducted within the Unit 1–4 area of the project site, other than the UST-related sampling discussed in Section 3.8.2.
- A total of 24 soil borings were advanced in the former cooling tower area of the project site. Soil samples were collected to a depth of 30 feet. The samples were analyzed for metals. Slightly elevated concentrations of arsenic were detected in several samples. An elevated concentration of lead (hazardous waste level) was detected in shallow soil at one location (B-10).

Soil vapor samples were collected from within the gravel pit and analyzed for VOCs. No VOC impacts were identified.

Groundwater samples have been collected from DWP well EV-04, located just west of the project site, between 1998 and 2009. Depth to groundwater in the well was reported to be greater than 150 feet. No VOC impacts were identified in the groundwater samples. No metals impacts, other than hexavalent chromium were identified in the groundwater (LADWP 2019). There is no current maximum contaminant level for hexavalent chromium.

The RWQCB Geotracker records related to an investigation under the Well Investigation Program. The VGS was investigated for potential solvent use and was given a no further action letter from the RWQCB in 1998.

A second no further action letter (from 2006) is included in the RWQCB Geotracker files. It relates to a soil investigation for metals impacts conducted by URS. The URS report was not included in the files for review; therefore, the sampling locations are not known.

3.9.4 Los Angeles Department of Water and Power Files

The LADWP provided the following documents for review: LADWP Valley Generating Station UST Abandonment Soil Report (TetraTech 2016), a letter report regarding Technical Approach for Further Environmental Activities, Valley Generating Station Gravel Pit (Kleinfelder 2019), design equipment plans for Units 1–4, a recent chemical inventory, and a recent list of mercury-containing devices at the VGS. The design equipment plans for Units 1–4 show the following site features: an oil-water separator, a weld shop, four abandoned fuel USTs, transformers, various former

aboveground oil and grease tanks, former acid tanks, oil sumps, trenches, and ground wells. The LADWP also provided a copy of the Revised Current Conditions Report for the VGS gravel pit and a 2019 Asbestos, Lead & Hazardous Waste Survey Inspection Report. The 2019 Asbestos, Lead & Hazardous Waste Survey Inspection Report noted the presence of asbestos and lead-based paint in Units 1–4. The assessment also included evaluation of select building materials, oils, and wastewaters at Units 1–4 for PCBs; a sample of oil from Unit 1 return pumps contained PCBs above 1 milligram per kilogram. The assessment also included evaluation of refractory insulation and brick samples from Units 1–4 and wastewater samples for metals; hazardous levels of lead, nickel, and vanadium were detected in the boiler bricks and refractory ceramic insulation (Focus 2019).

Further discussion of the reports provided by LADWP is included in the prior sections discussing sampling conducted at the VGS.

3.9.5 Regulatory Records Review

A search of regulatory records was conducted by EDR on October 17, 2019 (Appendix D-3). The search was conducted for the project site, and includes a 0.25-mile, 0.5-mile, and 1-mile search radius as defined in the records review requirements of the ASTM 1527-13 standard. The EDR report gives a listing of sites within the defined search radii that are listed on one or more environmental regulatory databases. Information in these listings includes the site name, location of the site relative to the project site, regulatory database listing, and the status of the listed site.

A total of 261 listings with 123 unique addresses were identified within a 1-mile radius of the project site; some of these sites were identified in more than one regulatory database. The number of sites and their proximity to the project site are as follows:

Of these listings, 173 were identified in databases that are used for permitting, inventory, and regulatory compliance purposes, and do not indicate a release of hazardous substances or petroleum products to the environment. The remaining sites were identified in regulatory databases that identify sites with known or suspected environmental contamination. The regulatory databases identified are summarized in the EDR Report (Appendix D-3).

Dudek reviewed the listings, the distance from the project site, and known environmental conditions (e.g., groundwater depth and flow direction) and identified listings that are considered potential environmental concerns to the proposed project. Table 8 summarizes the project site and adjacent listings and listings that Dudek identified as potentially impacting the environmental conditions of the project site. The additional sites not discussed in Table 8 were reviewed by Dudek and were determined not likely to impact the proposed project.

Table 8. Project Site Regulatory Database Listings

Business Name, Address	Database(s)	Details	Identified Environmental Concern
Valley Generating Station	RCRA-SQG, ERNS, FINDS,ECHO,ENF, NPDES, CIWQS, CPS-SLIC,CERS, HAZNET, HAZMAT, AST, HMIRS, CHMIRS, ICIS, RMP, EMI, WDS, WIP, UST	The site reportedly generates hazardous waste (solvent waste, corrosive, and ignitable waste). The site was investigated under the Well Investigation Program (WIP) for potential solvent use and subsequently granted no further action in March 1998. The site has an active NPDES permit for industrial wastewater and terminated industrial stormwater general permit. Minor releases of ammonia and asbestos have occurred; however, the releases were contained and/or cleaned up. The releases are not expected to have impacted the environmental conditions at the project site.	Potential impacts due to chemical storage and use on the project site.
Valley Generating Station Gravel Pit.	ENVIROSTOR, VCP	From the mid-1950s to late 1970s, wastewater generated from the project site activities, including oil ash scrubber water, boiler blowdown, and circulating cleaning wastewater was disposed into the gravel pit located adjacent to the project site in the northwest. After 1965, discharges to the gravel pit were regulated by an Industrial Waste Permit (W-273768) issued by the Los Angeles Department of Public Works and approved by the Los Angeles RWQCB. Three of the five discharge outfalls that terminate in the gravel pit have been closed, and the remaining two are used only for the discharge of stormwater. Multiple site investigation activities has been conducted at this site to determine vertical and horizontal impacts of the contaminants in the soil and groundwater. Groundwater at the project site is estimated to be 200–250 feet below ground surface (bgs) and generally flows towards the south. Primary contaminants of concerns are PCBs, SVOCs, and metals (nickel, vanadium, lead, arsenic). The site is currently active..	Potential impact of metals, PCBs and PAHs on the project site.
Valley Generating Station 9430 San Fernando Road	Envirostor, HIST UST, CA FID UST, EMI	This inactive DTSC case was evaluated in 1995. The site was noted to be contaminated with 4,000 cubic yards of oil ash. While no further location information was provided, this site is believed to be the gravel pit site that is being investigated under DTSC oversight. The UST information available for this site indicates several tanks were installed in 1954 and 1955: 650 gallon waste oil, 1,550 gallon product, 550 gallon waste oil, 450 gallon product, 1,700 gallon product, 7,500 gallon product, 6,225 gallon product, 7,350 gallon product, 600 gallon product, 43,000 gallon waste, 176,000 gallon product, and 256,200 gallon	Potential impact of TPH, metals, PCBs and PAHs on the project site. Potential for additional USTs to be present at the project site.

Table 8. Project Site Regulatory Database Listings

Business Name, Address	Database(s)	Details	Identified Environmental Concern
		product. Further information on these tanks was not available. Based on the sizes and lack of other information about USTs at the project site, it is likely that some of these listings are for ASTs.	
M&R Plating 11679 Sheldon Street	ENVIROSTOR	Site was evaluated under USEPA Grant in 2010/2011. No further information available to review.	No
Thermal Technologies 11660 Sheldon Street	ENVIROSTOR	Site was evaluated under USEPA –PASI Grant in 2010/2011. No further information available to review.	No
Truck Parts Corp 11675 W Sheldon Street	HAZMAT	No reported release.	No
Various, including Morton Grinding Inc. 11699 W. Sheldon Street	HAZMAT, RCRA NonGen, FINDS, ECHO	No reported release.	No
Simpson House Movers/Vito's Auto Parts 11705 Sheldon Street	CA FID UST, HIST UST, HAZMAT	6,000-gallon diesel tank. No reported release.	No
Structural Materials Company 11711–11731 Sheldon Street	HAZMAT, UST, CA FID UST, RCRA SQG, SWEEPS UST, FINDS, ECHO, ENF, NAZNET, NPDES, WDS, CIWQS, CERS	Inactive UST, no reported release.	No
M&A Plastics 11735 Sheldon Street	HAZNET, CERS, WIP	No reported release.	No
Honda Parts 11755 Sheldon Street	RCRA NonGen, RCRA-SQG, FINDS, ECHO, EMI, WIP	No reported release.	No

Table 8. Project Site Regulatory Database Listings

Business Name, Address	Database(s)	Details	Identified Environmental Concern
Scenic Highlights 11759 Sheldon Street	HAZMAT, RCRA NonGen	No reported release.	No
LADWP Truesdale Center 11797 Truesdale Street	UST, HAZMAT, AST	The site is not located adjacent to the project site; however, it is adjacent to the northeastern portion of the VGS facility. Several investigations, including soil sampling for PCBs have occurred. PCB impacts have been identified on the Truesdale property, including at the property boundary with the VGS site, north of the cooling tower project site area. The USEPA has indicated the potential for PCBs to be present on the VGS site.	Potential PCBs in soil
San Fernando Valley Area 1 Superfund Site	NPL	The project site is in the general area mapped for the San Fernando Valley Area 1 Superfund Site; however, the mapped groundwater contaminant plumes for TCE, PCE, 1,4-dioxane, and hexavalent chromium do not extend onto or adjacent to the project site (EPA 2019).	No

Notes: NPDES = National Pollutant Discharge Elimination System; RWQCB = Regional Water Quality Control Board; PCB = polychlorinated biphenyl; SVOC = semi-volatile organic compound; DTSC = Department of Toxic Substances Control; UST = underground storage tank; AST = aboveground storage tank; USEPA = U.S. Environmental Protection Agency; VGS = Valley Generating Station; LADWP = Los Angeles Department of Water and Power; TCE = trichloroethene; PCE = tetrachloroethene.

3.9.6 Site Visit

Christian Hunter of Dudek visited the proposed project site on February 6, 2019. During the site visit, Dudek discussed the proposed project with facility personnel. Nicole Peacock of Dudek also discussed hazardous materials at the project site with facility personnel on October 31, 2019. Based on the discussions and the site walk, the following is understood about hazardous materials at the proposed project site:

- Hazardous building materials at the site include asbestos, lead-based paint, and mercury. A hazardous materials survey was not provided to Dudek. If a survey of the project site has not been conducted, it will be conducted prior to demolition.
- Lubricating oil was stored in several large tanks in an equipment room. (Based on more recent conversations with LADWP, the oil may have recently been removed).
- Small quantities of waste materials were stored in drums and fireproof cabinets.
- Fuel oil may be present in piping at the project site.
- Oil may be present in sumps at the project site.

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 with Mitigation Incorporated. A variety of hazardous substances and wastes would be transported to, stored, used, and generated on the project site during demolition of the proposed project. These would include fuels for machinery and vehicles, new and used motor oils, cleaning solvents, paints, and storage containers and applicators containing such materials.

Additionally, hazardous wastes would be generated during the proposed project, including asbestos and lead-based paint removed from the facility during abatement activities. Potential wastes to be removed during the proposed project include potential oils removed from pipelines, sumps, and equipment, potential mercury removed from equipment, potential chemicals removed from storage containers and equipment (mineral oil, sodium hexametaphosphate, kerosene, hydraulic fluid, and aqua ammonia), potential PCB-containing oils removed from transformers, and potential TPH, metals, and PCB-impacted soils.

If not transported, used, or disposed of in a safe manner, hazardous materials used or generated during demolition represent a potential threat to the public and the environment. However, these materials would be transported, used, and disposed of in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. For example, hazardous materials would not be disposed of or released onto the ground or into the underlying groundwater or any surface water during demolition of the proposed project, and completely enclosed containment would be provided for all refuse generated on the project site. Furthermore, all construction and demolition waste, including trash, litter, garbage, solid waste, petroleum products, and any other potentially hazardous materials, would be removed and transported to a permitted waste facility for treatment, storage, or disposal.

However, to ensure that hazardous wastes that may be generated during demolition are appropriately anticipated and handled, MM-HAZ-1 is provided and would be implemented to ensure potential impacts during demolition are reduced to less than significant.

MM-HAZ-1 A hazardous waste management plan (HWMP) shall be developed and implemented during all demolition activities. The HWMP shall include a discussion of the anticipated/possible hazardous wastes that may be generated during the proposed project, the locations of these potential wastes, details of special handling, proposed storage locations, containers and labeling, testing for waste characterization, and possible disposal facilities. The HWMP would also include a hazardous substance management, handling, storage, disposal, and emergency response plan that establishes procedures for managing any hazardous substance releases on the project site. The HWMP shall include the recommendations in the 2019 Asbestos, Lead & Hazardous Waste Survey Inspection Report (Focus 2019). Copies of the HWMP shall be

maintained on site during demolition, excavation, and removal of materials from the project site. All workers on the project site should be familiar with the HWMP.

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 with Mitigation Incorporated. As discussed under Section 3.8.6(a), a variety of hazardous substances and wastes would be stored, used, and generated on the project site during demolition. Accidental spills, leaks, fires, explosions, or pressure releases involving hazardous materials represent a potential threat to human health and the environment if not properly treated. Accident prevention and containment would be the responsibility of the demolition contractors, and provisions to properly manage hazardous substances and wastes are typically included in contract specifications.

Additionally, as noted previously in Section 3.8, there are known and potentially impacted soils at the project site. These include known TPH-impacted soils beneath Tank 3 in the Unit 1–4 project site area (discussed in Section 3.8.2) and known areas of shallow metals impacts in the former cooling tower area of the project site (discussed in Section 3.8.3). Potentially impacted soils may be present in the following areas of the project site: the northern skim pond, the rim of the gravel pit, the area along the rail spur, the oil-water separator, oil sumps, oil and chemical storage tanks, trenches, and transformers. Additionally, PCB-impacted soils may be present in other areas of the project site.

Based on the presence of known and potential impacts at the project site, impacted soils could be encountered during demolition and excavation activities. The potential discovery of subsurface impacts during demolition and excavation could cause a significant impact and MM-HAZ-2 would be required to ensure potential impacts from encountering potentially contaminated soils during demolition are reduced to less than significant. As noted in MM-HAZ-2, the hazardous materials contingency plan shall include detailed information on the locations of known soil impacts along with discussion of potential impacts at the project site. The hazardous materials contingency plan will also be used to manage previously unidentified suspect soils encountered during excavation at the site. Additionally, to reduce impacts to construction workers and the VGS plant operators from encountering potentially contaminated soils, a health and safety plan shall be prepared and implemented.

MM-HAZ-2 is provided and would be implemented to ensure potential impacts during demolition are reduced to a less-than-significant level.

MM-HAZ-2 A hazardous materials contingency plan (HMCP) shall be followed during demolition and excavation activities for the proposed project. The hazardous materials contingency plan shall include, at a minimum, the following:

- Identification of known and suspected areas with hazardous waste and/or hazardous materials of concern. As such, the plan shall include detailed information on the locations of known soil

impacts, such as the total petroleum hydrocarbon (TPH)-impacted soils beneath Tank 3 and locations of known metals impacts on the cooling tower portion of the project site.

- Procedures for identifying suspect materials
- Actions to take if a previously unidentified underground storage tank (UST) is encountered
- Procedures for temporary cessation of construction activity and evaluation of the level of environmental concern.
- Procedures for restricting access to the contaminated area except for properly trained personnel.
- Procedures for notification and reporting, including internal management and local agencies (e.g., County Fire Department), as needed
- Determination of applicability of SCAQMD Rule 1166 (e.g., will VOC-contaminated soil [soil that registers greater than 50 parts per million using an organic vapor analyzer calibrated using hexane] be excavated).
- Health and safety measures for removal and excavation of contaminated soil.
- Procedures for characterizing and managing excavated soils.
- Procedures for certification of completion of remediation.
- A project-specific Health and Safety Plan shall be prepared in accordance with the Occupational Safety and Health Administration standards and included in the HMCP.
- Site workers shall be familiar with the hazardous materials contingency plan and should be fully trained on how to identify suspected contaminated soil.

Additionally, because PCBs may be difficult to identify in the field and because the USEPA recommended further sampling for PCB analysis at the VGS site (outside of the gravel pit area), further sampling for PCBs shall be conducted prior to the start of excavation. MM-HAZ-3 is provided and would be implemented to ensure potential impacts during excavation activities are reduced to a less-than-significant level.

MM-HAZ-3 Shallow soil samples shall be collected from proposed excavation areas within all three project site areas (Figure 2), including along the northern project site area and along the railroad spur area located within the project site, prior to excavation activities. The soil samples shall be collected in accordance with a work plan to be approved by the U.S. Environmental Protection Agency (USEPA). MM-HAZ-3 may be addressed in part or in whole by sampling currently planned by the Los Angeles Department of Water and Power (LADWP). If the USEPA-approved work plan currently planned by LADWP does not address all three areas of the project site, then additional sampling shall be conducted in the other area(s) of the project site following the procedures and sampling approach of the approved work plan. Excavated soil shall be managed in accordance with the Toxic Substances Control Act and/or DTSC requirements.

In addition, asbestos and lead paint are present within and around the generating units (Focus 2019). All asbestos-containing materials would be stored, handled, transported, and disposed of in accordance with the provisions established in SCAQMD Rule 1403 (SCAQMD 2007). Lead-based paint abatement or removal would include removal of any lead hazard, which, according to Title 17 of the California Code of Regulations, includes deteriorated lead-based paint and lead-contaminated soil (soil contaminated with lead paint chips). The California Occupational Safety and Health Administration lead standard for construction activities is implemented under Title 8 of the California Code of Regulations. The standard applies to any construction activity that may release lead dust or fumes, including manual scraping, manual sanding, heat gun applications, power tool cleaning, rivet busting, abrasive blasting, welding, cutting, or torch burning of lead-based coatings.

The 2019 Asbestos, Lead & Hazardous Waste Survey Inspection Report also noted the presence of PCBs in oil at Unit 1 (Focus 2019). This material will be managed in accordance with the HWMP (MM-HAZ-1). Additionally, mercury is present in various instruments and equipment. Other potential hazardous building materials in the on-site structures (e.g., refrigerants) were not explicitly evaluated. MM-HAZ-4 is provided and would require preparation of a hazardous materials building survey to document the presence of other potentially hazardous materials, such as refrigerants, within the structures. MM-HAZ-4 also contains provisions for abatement and handling of hazardous materials. With completion of the required asbestos and lead paint abatement, and with implementation of MM-HAZ-1 and MM-HAZ-4, impacts would be less than significant.

MM-HAZ-4 Prior to the issuance of a demolition permit for any existing on-site structure, a qualified environmental specialist shall conduct a survey for refrigerants and other hazardous building materials (other than asbestos, lead paint, mercury, and PCBs, which have already been identified at the site) to document the presence of any potentially hazardous materials within the structures. Any potentially hazardous materials identified as part of this survey and the prior surveys shall be handled in accordance with the Hazardous Waste Management Plan (MM-HAZ-1). Demolition plans and contract specifications shall incorporate any necessary abatement measures in compliance with the Metallic Discards Act of 1991 (PRC Section 42160 et seq.), particularly Public Resources Code Section 42175, Materials Requiring Special Handling, for the removal of mercury switches, PCB-containing ballasts, and refrigerants.

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?

No Impact. The nearest school to the project site is the PUC Triumph Charter High School (Los Angeles Unified School District), which is approximately 0.5 miles to the south–southeast. No schools are located within 0.25 miles of the project site (California School Campus Database 2019).

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

Less-Than-Significant Impact. Government Code Section 65962.5 requires the California Environmental Protection Agency to compile and update the hazardous waste and substances sites list (Cortese List). The Cortese List was designed to comply with Government Code Section 65962.5. While the Cortese List is no longer maintained as a single list, the following databases provide information regarding sites identified as meeting the Cortese List requirements:

1) List of Hazardous Waste and Substances sites from DTSC Envirostor database (Health and Safety Codes 25220, 25242, 25356, and 116395)
2) List of Open Leaking Underground Storage Tank Sites by County and Fiscal Year from the SWRCB GeoTracker database (Health and Safety Code 25295)
3) List of solid waste disposal sites identified by the SWRCB with waste constituents above hazardous waste levels outside the waste management unit (Water Code Section 13273 subdivision (e) and California Code of Regulations Title 14 Section 18051)
4) List of "active" Cease and Desist Orders and Cleanup and Abatement Orders from the SWRCB(Water Code Sections 13301 and 13304)
5) List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, identified by DTSC.

A review of the facilities and/or sites identified in these five databases was performed to determine if the proposed project site is listed on the Cortese List.

Hazardous Waste and Substances Site list

On November 4, 2019, the Hazardous Waste and Substances site list on DTSC's Envirostor online database was accessed (DTSC 2019b). The proposed project site is not listed on the DTSC Envirostor's Hazardous Waste and Substances site list. Additionally, no adjacent sites were listed in the database.

Leaking Underground Storage Tank Sites

On November 4, 2019, the SWRCB's GeoTracker database was accessed to obtain the list of open leaking UST sites located in the vicinity of the proposed project. The proposed project site was not listed in the GeoTracker database (RWQCB 2019).

Solid Waste Disposal Sites

On November 4, 2019, the list of solid waste disposal sites identified by SWRCB with waste constituents above hazardous waste levels outside the waste management unit were accessed. A total of 25 sites were listed in California; however, the project site was not listed (CalEPA 2019a).

Active Cease and Desist Orders and/or Cleanup and Abatement Orders

On November 4, 2019, the SWRCB list of active cease and desist orders and cleanup and abatement orders for California was accessed (CalEPA 2019b). The project site was not listed.

Hazardous Waste Facilities Subject to Corrective Action

The CalEPA Cortese List was accessed to obtain information on hazardous waste facilities identified in the Health and Safety Code 25187.5. Facilities identified under Health and Safety Code 25187 are those that DTSC determined required immediate corrective action to "abate imminent or substantial endangerment." Two sites were listed in California (CalEPA 2019c). The project site was not listed.

Based on this review, the proposed project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, 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?

Less-Than-Significant Impact. The project site is not located with an airport land use plan area. The project site is located approximately 1.1 miles southeast of Whiteman Airport, 0.5 miles southeast of the Whiteman Airport RPZ and Inner Safety Zone, and approximately 1 mile southeast of the Whiteman Airport Influence Area. The project site is also located approximately 2.8 miles northwest of the Burbank Airport, and approximately 2 miles northwest of the Burbank Airport RPZ, Inner Safety Zone, and Airport Influence Area (County of Los Angeles 2019). Additionally, the stacks associated with Units 1–4 are identified as a "checkpoint" on the Federal Aviation Administration's (FAA) Section Aeronautical Chart for Los Angeles County (FAA 2019). The chart provides aeronautical information related to visual and radio aids to navigation, airports, controlled airspace, restricted areas, obstructions, and related data. These charts are used by pilots and aid in visual navigation. The checkpoints mapped on the charts include populated places, drainage patterns, roads, railroads, and other distinctive landmarks.

A Notice of Proposed Construction or Alteration (FAA Form 7460-1) must be filed for any construction or alteration that may affect navigable airspace (any construction or alteration exceeding 200 feet above ground level). This form can be e-filed on FAA's Obstruction Evaluation/Airport Air Space Analysis portal. Because

the stacks associated with Units 1–4 are approximately 250 feet tall, LADWP would be required to report removal of the stacks according to the FAA Obstruction Evaluation/Airport Air Space Analysis portal instructions prior to commencing demolition. Appropriate filing of the proposed demolition would ensure aviation safety. Additionally, for aviation safety, the lights that are currently on each stack would remain operational until the stacks have been demolished down to below a height of 200 feet. Therefore, upon completion of the e-filing process by LADWP, the project would not result in a safety hazard or excessive noise for people within the project area, and impacts would be less than significant.

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

No Impact. The Los Angeles All-Hazard Mitigation Plan and the City of Los Angeles 2018 Local Hazard Mitigation Plan outline the strategies and goals for mitigation of natural and human-caused hazards in the County. The Los Angeles Fire Department responses to hazardous materials incidents. Facilities that store hazardous materials above threshold quantities are required to provide information on the facility and the hazardous materials stored in a Hazardous Materials Business Plan/Emergency Response Plan, submitted to the Certified Unified Program Agency (the Los Angeles Fire Department) so the Fire Department can appropriately respond to hazardous materials incidents. The Los Angeles County All-Hazard Mitigation Plan identifies critical emergency routes. As all demolition work for the proposed project would take place on the LADWP property, no impacts to emergency routes 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?

No Impact. The proposed project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. According to the City General Plan Land Use Map, the project site is completely developed as a public facility, and no wildlands exist within the project site. Therefore, no impacts would occur as a result of the project.

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3.10 Hydrology and Water Quality

Would the project:	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
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; or	☐	☒	☐	☐
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?	☐	☐	☒	☐

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

Less-Than-Significant Impact with Mitigation Incorporated. Water quality impacts could occur during demolition and excavation if activities resulted in spilled or leaked petroleum products and/or entrainment of sediment, debris, or other construction-related materials into stormwater runoff. A potential source of contamination is leaked fuel that could be present in stockpiled soil from the excavation of the underlying fuel storage tanks.

LADWP requires its workers and construction contractors to adhere to standard site management practices and applicable water quality regulations, which collectively would avoid or substantially minimize potential threats to water quality. Demolition would occur within the Valley Generating Station, an industrial, paved environment adjacent to an urban streetscape; as such, runoff would flow to storm drains rather than directly to natural creek corridors or infiltrating into the groundwater.

To avoid adverse impacts on water quality, LADWP and/or its construction contractor would implement standard site management practices (e.g., perimeter controls, storm drain inlet protection, maintaining a clean and orderly work area) and would conduct construction activities in accordance with the statewide General Permit for Discharges of Stormwater Associated with Construction Activity (Order No. 2009-0009-DWQ/CAS000002, as amended). Where applicable, LADWP and/or its construction contractor would submit all permit registration documents to the SWRCB, including a SWPPP. The SWPPP would include all applicable BMPs necessary to meet discharge prohibitions, effluent limitations, and other performance standards specified in the permit. The following list includes examples of BMPs that would be implemented during demolition activities:

- Stockpile containment and exposed soil stabilization structures (e.g., Visqueen plastic sheeting, fiber rolls, gravel bags and/or hydroseed);
- Storm drain inlets in the demolition area would be surrounded by gravel bags or other suitable methods of filtration.
- All potential hazardous wastes would be contained, transported, and disposed of in accordance with applicable regulations.
- Demolition work areas would be regularly swept and kept clean, orderly, and free of trash.
- All authorized non-stormwater discharges would be identified in the SWPPP along with BMPs that would be implemented to eliminate or reduce pollutants, which may include use of settling tanks or screens to reduce suspended sediment loads.

Once demolished, the worksite would be returned to pre-construction conditions (i.e., void of debris). However, during demolition activities, there is a potential for water quality contamination from leaked fuel in

the stockpiled soil from the excavation of the underlying fuel storage tanks. The stockpiled soil have a potential to release contaminants into the adjacent storm drains in the form of stormwater runoff. Potential water quality impacts are considered potentially significant but mitigable with incorporation of MM-HYD-1.

MM-HYD-1 Excavated soil piles shall be covered with an impermeable plastic sheeting and containment booms shall be placed around the soil pile perimeters to reduce the potential for contaminated runoff and soil erosion, pending either off-site disposal or use as backfill on site.

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?

Less-Than-Significant Impact. Four underground fuel oil storage tanks, located to the northeast of within VGS Units 1–4 demolition boundaries (Figure 2), would be removed as a result of demolition activities. The Project is located adjacent to the Tujunga Wash and the Hansen Spreading Grounds, both of which are conducive to high infiltration rates for groundwater recharge. As such, shallow groundwater may be present within the Project site. The Tujunga Wash and the Hansen Spreading Grounds would suggest that shallow groundwater levels are high may be present at this location. If high groundwater is encountered during excavation, a watertight shoring system and dewatering may be required. Groundwater would be removed from the excavations by using sump pumps in the bottom of the excavation. The extracted groundwater would be pumped into a settling tank, tested, and then treated for any contaminants before being discharged to the storm drain system in accordance with RWQCB permit requirements, or to the sanitary sewer system in accordance with Sewer Capacity Availability Request permit requirements. If water were to be discharged to the storm drain system, LADWP would file a Notice of Intent to comply with the General NPDES Permit for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters (Order No. R4-2018-0125, NPDES No. CAG994004). LADWP would be required to comply with all applicable permit conditions. Groundwater removal would be temporary and in negligible quantities with respect to a decrease in available groundwater supplies beneath the site. In addition, the project site is currently paved and excavated areas would be re-paved subsequent to demolition activities. Therefore, the project would not interfere with groundwater recharge, such that the project would impede sustainable groundwater management of the basin. As a result, impacts are considered less than significant.

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. Demolition and excavation of the VGS Units 1–4 and the underground fuel tanks would not substantially alter the existing drainage pattern of the site or area. The project site is currently paved and excavated areas would be re-paved subsequent to demolition activities. No increase in stormwater runoff volume or rates would occur post-demolition. Stormwater runoff would continue to be controlled by on-site storm drains, which feed into off-site storm drains and the adjacent Tujunga Wash. As a result, the project would not result in on- or off-site erosion and associated siltation of downstream drainages, including the Tujunga Wash and downstream Los Angeles River. Impacts would be less than significant.

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

Less-Than-Significant Impact. As discussed for Section 3.10(c)(i), the project site is currently paved and excavated areas would be re-paved subsequent to demolition activities. No increase in stormwater runoff volume or rates would occur post-demolition. Stormwater runoff would continue to be controlled by on-site storm drains, which feed into off-site storm drains and the adjacent Tujunga Wash. As a result, the project would not result in on- or off-site flooding. Impacts 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; or

Less-Than-Significant Impact with Mitigation Incorporated. As discussed for Section 3.10(c)(i), the project site is currently paved and excavated areas would be backfilled and graded with crushed concrete. No increase in stormwater runoff volume or rates would occur post-demolition. Stormwater runoff would continue to be controlled by on-site storm drains, which feed into off-site storm drains and the adjacent Tujunga Wash. As a result, the project would not exceed the capacity of existing or planned stormwater drainage systems. With respect to polluted runoff, leaked fuel could be present in stockpiled soil as a result of excavating the underlying fuel storage tanks. Potential water quality impacts are considered potentially significant but mitigable with incorporation of MM-HYD-1.

iv) impede or redirect flood flows?

Less-Than-Significant Impact. According to the Federal Emergency Management Agency (FEMA), the project site is within Zone X, Area of Minimal Flood Hazard (FEMA 2008). The project would

not include any new permanent construction that could potentially impede or redirect flood flows. As such, impacts are considered **less than significant**.

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

Less-Than-Significant Impact. The project site is not located within a flood hazard or tsunami zone (County of Los Angeles 2014a, 2014b; FEMA 2008). Additionally, seiches are unlikely to affect the site as the nearest body of water is approximately 1 mile to the northwest. The project is, however, in a potential dam inundation area (City of Los Angeles 1996). Dam failure potential is generally low, and the extent of inundation depends on the amount of water held at the time of failure. In addition, the project site would involve removal of potential sources of contaminants (VGS Units 1–4 and underground fuel tanks) and replacing them with crushed concrete and fill soils. As such, once completed, the project is unlikely to release pollutants in the event of inundation. As a result, the projects impacts are considered less than significant.

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

Less-Than-Significant Impact. During project demolition, the proposed project would comply with regional and local regulations requiring preparation of a SWPPP as well as with construction dewatering permit requirements, if necessary. The proposed project would not obstruct existing water quality control plans or sustainable groundwater management plans. Therefore, less-than-significant impacts would occur related to conflicts with a water quality control plan or sustainable groundwater management plan.

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3.11 Land Use and Planning

Would the project:	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
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?	☐	☐	☐	☒

a) Would the project physically divide an established community?

No Impact. The proposed demolition of VGS Units 1–4 and the related systems and equipment, the bearing cooling tower, the skim pond, and the remaining foundations of four cooling towers would be completely contained within the existing VGS property, which is owned by LADWP. The physical division of an established community typically refers to the construction of a linear feature (e.g., a major highway or railroad tracks) or removal of a means of access (e.g., a local road or bridge) that would impair mobility within an existing community or between a community and outlying area. Under the existing condition, the project site is not used as a connection between established communities. Instead, connectivity within the area surrounding the project site is facilitated via local roadways and pedestrian sidewalks. Further, the project site is largely surrounded by industrial, manufacturing and auto-related uses. Therefore, the project would not result in physical division of any established communities. 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 project would be entirely within the existing boundaries of VGS, which is located within the Community Plan Area in the City. The project site currently has a land use designation of Public Facilities (City of Los Angeles 2018b) and is zoned Public Facilities (PF) (City of Los Angeles 2018a). The existing and proposed use at VGS is consistent with the Public Facilities zoning and land use designations. Therefore, the project would not conflict with any applicable land use plan, policy, or regulation, and no impact would occur.

References Cited

City of Los Angeles. 2018a. Zoning Map. Accessed April 2019. http://zimas.lacity.org/.

City of Los Angeles. 2018b. Land Use Map. Accessed April 2019. https://planning.lacity.org/MapGallery/Image/Citywide/GPLanduse.pdf.

3.12 Mineral Resources

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

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?

Less-Than-Significant Impact. The State Mining and Reclamation Act of 1975 (California PRC Section 2710 et seq.) requires that the California State Geologist implement a mineral land classification system to identify and protect mineral resources of regional or statewide significance in areas where urban expansion or other irreversible land uses may occur, thereby potentially restricting or preventing future mineral extraction on such lands. As mandated by the State Mining and Reclamation Act of 1975, aggregate mineral resources within the state are classified by the State Mining and Geology Board through application of the Mineral Resource Zone (MRZ) system. The MRZ system is used to map all mineral commodities within identified jurisdictional boundaries, with priority given to areas where future mineral resource extraction may be prevented or restricted by land use compatibility issues, or where mineral resources may be mined during the 50-year period following their classification. The MRZ system classifies lands that contain mineral deposits and identifies the presence or absence of substantial sand and gravel deposits and crushed rock source areas (i.e., commodities used as, or in the production of, construction materials). The state geologist classifies MRZs within a region based on the following factors:

MRZ-1: Areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.

MRZ-2: Areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence.

MRZ-3: Areas containing mineral deposits for which the significance cannot be determined from available data.

According to a map obtained through the California Department of Conservation and California Geological Survey, the project site is located within an MRZ-2 zone, meaning that it is in an area where adequate information indicates that significant mineral deposits are present (Miller 1994).

As described in the City's General Plan Conservation Element, natural mineral deposits are nonrenewable resources that cannot be replaced once they are depleted. Primary mineral resources found within the city are rock, gravel and sand deposits, which follow along the Los Angeles River floodplain, coastal plain and other bodies of water (City of Los Angeles 2001). Exhibit A of the City General Plan Conservation Element identifies mineral resources within the City. The project site is located within a MRZ-2, as outlined in Exhibit A (City of Los Angeles 2001). As identified by the state geologist, MRZ-2 sites contain potentially significant mineral deposits, and are found along the floodplain from the San Fernando Valley through the downtown area (City of Los Angeles 2001).

While the MRZ boundary suggests there are significant mineral deposits present, the project would not involve extraction of mineral resources or result in the loss of availability of a mineral resource of value to the region and residents of the state. The VGS has been in operation since 1951 and would continue to operate as a power plant despite demolition of Units 1–4 and the four cooling tower foundations. Due to the nature of the project, the impact to the minerals would be less-than-significant, and it would not preclude future use of mining in the area.

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?

Less-Than-Significant Impact. LADWP proposes to demolish Units 1–4 and associated structures and systems, and four concrete foundations of demolished cooling towers within the VGS. As described above in Section 3.12(a), Exhibit A of the City General Plan identifies the project site as being within a MRZ-2, and therefore, potentially significant mineral deposits are present (City of Los Angeles 2001). However, because the project would be located within the existing VGS site, the project would not 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. Therefore, the project would result in a less-than-significant impact to locally important mineral resources.

References Cited

City of Los Angeles. 2001. "Conservation Element." In *City of Los Angeles General Plan*, II-57 through II-59. Adopted September 25, 2001. Accessed April 30, 2019. https://planning.lacity.org/cwd/gnlpln/consvelt.pdf.

Miller, R.V. 1994. "Designated Areas Urbanized" Digital. Scale 1:24,000. The Department of Conservation, Division of Mines and Geology.

3.13 Noise

Would the project:	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
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?	☐	☐	☐	☒

Noise measurements were conducted at noise-sensitive land uses adjacent to the project site in October 3, 2019, to characterize the existing acoustical environment. The daytime, short-term (1 hour or less) sound level measurements were taken with a SoftdB Piccolo sound-level meter. This sound-level meter meets the current American National Standards Institute standard for a Type 2 (General Purpose) sound-level meter. The calibration of the sound-level meter was verified before and after the measurements, and the measurements were conducted with the microphone positioned approximately 5 feet above the ground.

Four short-term noise measurement locations (ST1–ST4) were selected. Measurement locations ST1, ST2, ST3, and ST4 represent the nearest noise-sensitive land uses. Measurement locations are shown in Figure 4, Noise Measurement Locations. Noise measurement data is included in Appendix E. The primary noise sources at the locations consisted of traffic near and far; other, secondary noise included distant commuter train noise (at measurement location ST1) and industrial noise (at measurement location ST4). As shown in Table 9, the measured equivalent continuous sound level (L_{eq}) noise levels ranged from 61 A-weighted decibels (dBA) L_{eq} at ST3 to 70 dBA L_{eq} at ST2 and ST4.

Table 9. Measured Short-Term Noise Levels

Receptor	Location/Address	Date	Time	L_{eq} (dBA)	L_{max} (dBA)
ST1	Residences southwest of project site, 9378 Ilex Avenue	October 3, 2019	9:37 a.m.–9:53 a.m.	63	80.4

Table 9. Measured Short-Term Noise Levels

Receptor	Location/Address	Date	Time	L_{eq} (dBA)	L_{max} (dBA)
ST2	Motel southwest of project site, 9417 San Fernando Road	October 3, 2019	10:00 a.m.–10:15 a.m.	70.2	88.5
ST3	Hospital southwest of project site, 9449 San Fernando Road	October 3, 2019	10:21 a.m.–10:36 a.m.	61.3	75.5
ST4	Residences southwest of project site, 12112 Truesdale Street	October 3, 2019	10:47 a.m.–11:02 a.m.	70.2	90.5

Source: Appendix E.
Notes: L_{eq} = equivalent continuous sound level (time-averaged sound level); dBA = A-weighted decibel; L_{max} = maximum sound level during the measurement interval.

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?

On-Site Noise

Less-Than-Significant Impact. On-site noise-generating activities associated with the proposed project would include temporary on-site noise from demolition activities. The proposed project would also generate temporary off-site traffic noise along nearby arterial roadways from trucks and worker vehicles during demolition. No long-term operational noise would be generated by the proposed project.

The City regulates noise through several sections of its Municipal Code, as follows:

- Section 41.40 (Noise Due to Construction, Excavation Work – When Prohibited), which establishes time prohibitions on noise generated by construction activity.
- Section 112.04 (Powered Equipment Intended for Repetitive Use in Residential Areas and Other Machinery, Equipment, and Devices), which prohibits the use of loud machinery and/or equipment within 500 feet of residences and prohibits noise from machinery, equipment, or other devices that would result in an increase of more than 5 decibels (dB) above the ambient noise level at residences.
- Section 112.05 (Maximum Noise Level of Powered Equipment or Powered Hand Tools), which establishes maximum noise levels for powered equipment and powered hand tools (i.e., 75 dBA at a distance of 50 feet for construction, industrial, and agricultural equipment between the hours of 7:00 a.m. and 10:00 p.m.).

According to Section 41.40, no construction (or in this case, demolition) activities that might create loud noises in or near residential areas or buildings shall be conducted between the hours of 9:00 p.m. and 7:00 a.m. on weekdays, before 8:00 a.m. or after 6:00 p.m. on Saturday and national holidays, or at any time on Sunday.

Construction Noise.

Noise and vibration levels during project implementation would vary from hour to hour and day to day, depending on the equipment in use, the operations being performed, and the distance between the source and receptor. Demolition activities are anticipated to take place over approximately a 30-month period. Phases of the proposed project would include preparatory work, hazardous waste removal, demolition of structures, excavation and subgrade work, and material hauling.

Equipment that would be in operation during demolition would include excavators, cranes, loaders, aerial lifts, shears, water trucks, sweepers, and concrete-crushing equipment. The typical maximum noise levels for various pieces of construction equipment at a distance of 50 feet are presented in Table 10, Construction Equipment Maximum Noise Levels. The equipment noise levels presented in Table 10 are maximum noise levels. Typically, construction equipment operates in alternating cycles of full power and low power, producing average noise levels less than the maximum noise level. The average sound level of demolition activity also depends on the amount of time that the equipment operates and the intensity of demolition activities during that time.

Table 10. Construction Equipment Maximum Noise Levels

Equipment Type	Equipment Noise Level at 50 Feet (dBA)
Air compressor[1]	81
Backhoe[1]	80
Crane, Derrick[1]	88
Crane, Mobile[1]	83
Dozer[1]	85
Front End Loader[2]	80
Generator[1]	81
Grader[1]	85
Loader[1]	85
Mounted Impact Hammer (Hoe Ram) [2]	90
Pneumatic Tools[1]	85
Pump[1]	76
Saw[1]	76
Shears (on backhoe) [2]	85
Shovel[1]	82
Truck[1]	88

Sources:
1 FTA 2018.
2 FHWA 2008.
Notes: dBA = A-weighted decibel.

SOURCE: Bing Maps 2018, Los Angeles County 2011

Los Angeles Department of Water & Power

FIGURE 4

Noise Measurement Locations

Valley Generating Station

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The maximum noise levels at 50 feet for typical construction equipment would range up to 90 dBA for the type of equipment normally used for this type of demolition project, although the hourly noise levels would vary. Construction (or demolition) noise in a well-defined area typically attenuates at approximately 6 dBA per doubling of distance. Because of the size of the project, demolition activities would take place over a wide range of distances from existing noise-sensitive uses to the southwest. For example, demolition of structures near the southwesterly side of the project would be within approximately 1,100 feet from existing noise-sensitive uses, but demolition of structures near the northeasterly side of the project would be approximately 2,900 feet from the same noise-sensitive uses. Typically, the majority of demolition noise would occur at distances of approximately 1,800 feet or more from existing noise-sensitive uses.

The Federal Highway Administration's (FHWA's) Roadway Construction Noise Model (RCNM) (FHWA 2008) was used to estimate demolition noise levels at the nearest noise-sensitive land uses, which consist of residences, a hospital and a motel to the southwest of the project site. Although the model was funded and promulgated by the FHWA, the RCNM is often used for non-roadway projects because the same types of equipment used for roadway projects are also used for other project types. Input variables for the RCNM consist of the receiver/land use types, the equipment type and number of each (e.g., two graders, a loader, a tractor), the duty cycle for each piece of equipment (e.g., percentage of hours the equipment typically works per day), and the distance from the noise-sensitive receiver. The RCNM has default duty-cycle values for the various pieces of equipment, which were derived from an extensive study of typical demolition activity patterns (FHWA 2008). Those default duty-cycle values were used for this noise analysis.

Using FHWA's RCNM construction noise model and demolition information (types and number of construction equipment by phase), the estimated noise levels from demolition of the generator units and ancillary facilities were calculated for the various receptor locations, as presented in Tables 11 and 12. The RCNM inputs and outputs are provided in Appendix E. Additionally, Tables 11 and 12 present the projected noise levels during demolition activities for the receivers nearest to the project site (a motel and a hospital, approximately 1,100 feet from the nearest active construction work) and the next-nearest receivers (residences, approximately 1,200 feet from the nearest active construction work), respectively.

Table 11. Demolition Noise Modeling and Projected Ambient Plus Demolition Noise Summary – Nearest Receivers (ST2, ST3)

Demolition Activity	Receivers ST2 (Motel) and ST3 (Hospital)			
	Demolition Activity Noise at Receivers ST2 and ST3 (dBA L_{eq})[1] – Nearest Source-Receiver Distance (Approximately 1,100 feet)	*Demolition Activity Noise at Receivers ST2 and ST3 (dBA L_{eq})[1] – Typical Source-Receiver Distance (Approximately 1,800 feet)*	*Ambient Plus Demolition Noise(dBA L_{eq}) at Receivers ST2 and ST3[2] – Nearest Source-Receiver Distance (Approximately 1,100 feet)*	*Ambient Plus Demolition Noise (dBA L_{eq}) at Receivers ST2 and ST3[2] – Typical Source-Receiver Distance (Approximately 1,800 feet)*
Phase 1	55	51	62	62
Phase 2	NA	NA	NA	NA
Phase 3A	61	57	64	63
Phase 3B	56	53	62	62
Phase 3C	59	56	63	62
Phase 4A	61	58	64	63
Phase 4B	56	52	62	62
Phase 4C	59	55	63	62
Phase 4D	56	55	62	62
Phase 4E	60	57	64	63
Phase 4F	59	58	63	63
Phase 4G	54	52	62	62
Phase 4H	58	57	63	63
Phase 4I	56	55	62	62
Phase 4J	54	52	62	62
Phase 5A	56	53	63	62
Phase 5B	56	54	62	62
Phase 5C	58	54	63	62
Phase 6	59	56	63	62

Source: Appendix E.
Notes: NA = not applicable, no major noise-generating equipment used for this phase; dBA = A-weighted decibel; L_{eq} = equivalent continuous sound level (time-averaged sound level).
No topographical or structural shielding was assumed in the modeling.
1 Demolition noise calculated using RCNM.
2 Using the lower of the two ambient noise measurements for ST2 and ST3 (61 dBA L_{eq}), combined (ambient plus demolition) noise levels for the closest receivers to the southwest during project demolition were calculated with the following formula (Harris 1991):
Total L = 10 × log10([10^(ST3 ambient L_{eq}/10)]+[10^(Demolition L_{eq}/10)]).

Table 12. Demolition Noise Modeling and Projected Ambient Plus Demolition Noise Summary - Next-Nearest Receivers (ST1, ST4)

Demolition Activity	Receivers ST1 (Residences) and ST4 (Residences)			
	Demolition Activity Noise at Receivers ST1 and ST4 (dBA L_{eq})[1] – Nearest Source-Receiver Distance (Approximately 1,200 feet)	*Demolition Activity Noise at Receivers ST1 and ST4 (dBA L_{eq})[1] – Typical Source-Receiver Distance (Approximately 1,900 feet)*	*Ambient Plus Demolition Noise(dBA L_{eq}) at Receivers ST1 and ST4[2] – Nearest Source-Receiver Distance (Approximately 1,200 feet)*	*Ambient Plus Demolition Noise (dBA L_{eq}) at Receivers ST1 and ST4[2] – Typical Source-Receiver Distance (Approximately 1,900 feet)*
Phase 1	50	46	63	63
Phase 2	NA	NA	NA	NA
Phase 3A	55	52	64	63
Phase 3B	50	47	63	63
Phase 3C	53	50	63	63
Phase 4A	55	53	64	63
Phase 4B	50	47	63	63
Phase 4C	53	50	63	63
Phase 4D	53	50	63	63
Phase 4E	54	51	64	63
Phase 4F	54	53	64	63
Phase 4G	49	47	63	63
Phase 4H	53	51	63	63
Phase 4I	51	50	63	63
Phase 4J	49	47	63	63
Phase 5A	51	47	63	63
Phase 5B	51	49	63	63
Phase 5C	53	49	63	63
Phase 6	53	51	63	63

Source: Appendix E.
Notes: NA = not applicable; no major noise-generating equipment used for this phase; dBA = A-weighted decibel; L_{eq} = equivalent continuous sound level (time-averaged sound level).
A 5-decibel (dB) structural shielding was used in the modeling to account for intervening wall at residential boundary.
1 Demolition noise calculated using RCNM.
2 Using the lower of the two ambient noise measurements for ST1 and ST4 (63 dBA L_{eq}), combined (ambient plus demolition) noise levels for the closest receivers to the southwest during project demolition were calculated with the following formula (Harris 1991):
Total L = 10 × log10([10^(ST1 ambient L_{eq}/10)]+[10^(Demolition L_{eq}/10)]).

As presented in Table 11, the highest noise levels at the nearest noise-sensitive receivers are predicted to occur during phases 3A and 4A, when noise levels from the demolition activity would be as high as 61 dBA L_{eq} at the hospital and the motel, approximately 1,100 feet away. The lower of the two existing ambient noise measurements in that

area was approximately 61 dBA L_{eq} (at Location ST3, as shown in Table 9), and the predicted combined (ambient plus demolition) noise level would be 64 dBA L_{eq}. This increase in the noise level above the ambient level of approximately 3 dBA L_{eq} would not be readily discernible, and would not exceed the threshold set forth in Section 112.04 of the Municipal Code, which prohibits an increase of 5 dBA or more above ambient levels.

As presented in Table 12, the highest noise levels at the next-nearest receivers are predicted to occur during phases 3A and 4A, when noise levels from the demolition activity would be as high as 55 dBA L_{eq} at the nearest residences, approximately 1,200 feet away. The lower of the two existing ambient noise measurements in that area was approximately 63 dBA L_{eq} (at Location ST1, as shown in Table 9), and the predicted combined (ambient plus demolition) noise level would be 64 dBA L_{eq}. This increase in the noise level of approximately 1 dBA L_{eq} would not be readily discernible and would not result in an increase above ambient levels of 5 dBA or more. Thus, noise impacts from temporary on-site construction activities would be less than significant.

Off-Site Traffic Noise

The proposed project would result in temporary increases in traffic from worker vehicles and project-related trucks. The increase in vehicles along local arterials would correspond with an increase in traffic noise. Based on the Traffic Impact Analysis prepared for the project (Section 3.17), the project would result in as many as 30 daily truck trips (15 round trips) and 224 daily one-way worker trips during the peak month of traffic related to the proposed project, as shown in Table 15. However, as shown the maximum number of trips would occur along Sheldon Street, between Glenoaks Boulevard and San Fernando Road, along which there are no noise-sensitive land uses. Similarly, Glenoaks Boulevard between Branford Street and Tuxford Street does not have adjacent noise-sensitive land uses.

San Fernando Road between Branford Road and Sheldon Street does have adjacent noise-sensitive land uses (represented by receivers ST1 through ST4). As shown in Table 13, this segment of San Fernando Road is predicted to have a total of 28 project-related worker trips and 0 project-related truck trips. San Fernando Road in this area presently carries approximately 16,964 vehicles on a daily basis, and in Year 2023 it is projected to carry approximately 17,303 vehicles daily. Because of the relatively small number of vehicles added by the project during construction (an increase of less than 0.2%), traffic noise levels would not increase as a result of the project[17]. Similarly, San Fernando Road between Sheldon Street and Lankershim Boulevard is projected to carry approximately 96 worker vehicles daily, but the increase would represent a temporary increase of approximately 0.5% and, thus, would not result in a measurable or perceptible increase in traffic noise. Therefore, noise impacts from off-site project-related vehicles would be less than significant.

[17] All other factors being equal, a doubling of the traffic volume (i.e., a 200% increase) would be necessary in order to result in a "barely perceptible" change of 3 dB in the traffic noise (Harris 1991).

Table 13. Construction Related Traffic – Average Daily Trips

Roadway Segment	Existing ADT	Project Traffic	Workers	Trucks	Existing + Project	Year 2023 ADT	Year 2023 + Project ADT
Glenoaks Boulevard, between Branford Street and Sheldon Street	27,433	6	6	0	27,439	27,982	27,988
Glenoaks Boulevard, between Sheldon Street and Tuxford Street	24,239	36	6	30	24,275	24,724	24,760
Sheldon Street, between Glenoaks Boulevard and San Fernando Road	20,152	254	224	30	20,406	20,555	20,809
San Fernando Road, between Branford Street and Sheldon Street	16,964	28	28	0	16,992	17,303	17,331
San Fernando Road, between Sheldon Street and Lankershim Boulevard	19,622	96	96	0	19,718	20,014	20,110
Sheldon Street, between San Fernando Road and Laurel Canyon Boulevard	20,445	90	90	0	20,535	20,854	20,944

Notes: ADT = average daily trips.

It is anticipated that demolition activities associated with the proposed project would take place between the hours of 7:00 a.m. and 9:00 p.m. on weekdays, 8:00 a.m. and 6:00 p.m. on Saturdays, and would not take place on Sunday or national holidays; furthermore, the construction activities would not result in an increase of 5 dBA above ambient noise levels at residences. Therefore, the project would not violate City standards for construction/demolition noise and would not result in a substantial noise increase; noise levels from construction would be less than significant. No noise mitigation measures are required.

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

No Impact. Demolition and clearing activities that might expose persons to excessive groundborne vibration or groundborne noise have the potential to cause a significant impact. Groundborne vibration information related to construction/heavy equipment activities has been collected by the California Department of Transportation (Caltrans). Information from Caltrans indicates that transient vibrations (such as from demolition activity) with a peak particle velocity of approximately 0.035 inches per second may be characterized as barely perceptible, and vibration levels of 0.24 inches per second may be characterized as distinctly perceptible (Caltrans 2013). The heavier pieces of construction equipment, such as large bulldozers or hoe rams, would have peak particle velocities of up to approximately 0.089 inches per second at a distance of 25 feet, and a clam shovel drop would have peak particle velocities of up to approximately 0.202 inches per second at a distance of 25 feet (FTA 2018).

Ground-borne vibration is typically attenuated over relatively short distances. At the nearest existing residential use distance to the nearest construction area (approximately 1,100 feet) and with the anticipated construction equipment, the peak particle velocity would be approximately 0.0007 inches per second. This vibration level would be well below the threshold of "barely perceptible" of 0.035 inches per second vibration.

Therefore, the major concern with construction (or demolition) vibration is related to building damage. Demolition vibration as a result of the proposed project would not result in structural building damage, which typically occurs at vibration levels of 0.5 inches per second or greater for buildings of reinforced-concrete, steel, or timber construction. There would be no impacts related to groundborne 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. There are no private airstrips within the vicinity of the project site (Airnav 2019). Therefore, the proposed project would not expose people residing or working in the project area to excessive noise levels from a private airstrip. Additionally, although the project site is located approximately 1.1 miles southeast of Whiteman Airport, and approximately 2.8 miles northwest of Hollywood Burbank Airport, the project site is located well outside of the airport influence areas and the 65 dBA noise contour impact zones of these airports (Los Angeles County Airport Land Use Commission 2004). Furthermore, the proposed project is within the boundaries of an existing power generation plant and would not provide any new facilities such that people residing or working in the project area would be exposed to increased noise levels from aircraft. Therefore, no impact would occur.

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3.14 Population and Housing

Would the project:	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
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?	☐	☐	☐	☒

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 project would not include new homes or businesses. Additionally, the project would not increase the power generating capacity at VGS; therefore, the project would not indirectly induce population growth in the area. It is anticipated that the number of daily on-site personnel would range from a low of 15 to a high of 112, peaking at or above 100 during numerous months of the project. Given the temporary nature of construction industry jobs, the relatively large regional construction industry, and the relatively nominal number of construction workers needed, it is likely that the labor force from within the region would be sufficient without a substantial influx of new workers and their families. Accordingly, construction employment generated by the project would not affect population growth in the region. As such, 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 is located fully within the Valley Generating Station, which is owned by LADWP and would not displace any existing housing. No impact would occur.

3.15 Public Services

Would the project:	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:				
Fire protection?	☐	☐	☐	☒
Police protection?	☐	☐	☐	☒
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☐	☒

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

Fire Protection

No Impact. VGS is served by the City of Los Angeles Fire Department. The project would remove Units 1–4 and associated structures and systems, the bearing cooling tower foundation, skim pond, and four concrete foundations of demolished cooling towers within the VGS property. No new structures are proposed to be constructed as part of the project, nor would the project increase the number of LADWP personnel staffed on site. At least one prefabricated trailer would be added near Units 5, 6, and 7 to house existing LADWP employees, as the location would be more centrally located to the site than the existing administration building. However, it is unlikely that the addition of the trailer(s) would result in increased demands for service such that new or physically altered governmental facilities would be required. Therefore, no new or expanded fire protection services would be required as a result of the project, and no impact would occur.

Police Protection

No Impact. VGS is served by the City of Los Angeles Police Department and LADWP security personnel. The project would demolition of structures within the VGS property boundaries, and no new or expanded structures or facilities are proposed for construction as part of the project. At least one prefabricated trailer would be added near Units 5, 6, and 7 to house existing LADWP employees, as the location would be more

centrally located to the site than the existing administration building. However, it is unlikely that the addition of the trailer(s) would result in increased demands for service such that new or physically altered governmental facilities would be required. Further, the project would not result in an increase in the number of LADWP personnel on site. Therefore, new or expanded police protection services would not be required at the site, and no impact would occur.

Schools

No Impact. The project involves demolition and removal of structures within the VGS property boundaries. It is expected that 100 or more construction workers who may work on the site during the peak of construction would come from the regional labor pool and would not need to relocate to the area. The project would not involve employment of a new permanent workforce that would necessitate the expansion of school services to serve new residents. Therefore, no impact to schools would occur.

Parks

No Impact. The project would involve demolition and removal of structures within the VGS property boundaries. It is expected that the 100 or more construction workers who may work on the site during the peak of construction would come from the regional labor pool and would not need to relocate to the area. The project would not involve employment of a new permanent workforce that would necessitate the expansion of parks or development of new parks to serve new residents. Therefore, no impacts to parks would occur.

Other Public Facilities

No Impact. The project would involve demolition and removal of structures within the VGS property boundaries. It is expected that the 100 or more construction workers who may work on the site during the peak of construction would come from the regional labor pool and would not need to relocate to the area. The project would not involve employment of a new permanent workforce that would necessitate the expansion of other public facilities to serve new residents. Therefore, no impact to other public facilities would occur.

3.16 Recreation

Would the project:	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?	☐	☐	☐	☒

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 project would involve the demolition of Units 1–4 and associated structures and systems, the bearing cooling tower foundation, skim pond, and four concrete foundations of demolished cooling towers within the VGS property boundaries. It is anticipated that construction workers would come from the region and would not need to relocate to the area. Therefore, the project would not increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of facilities would occur. Therefore, the project would result in no impact to existing neighborhood and regional parks or other recreational facilities.

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

No Impact. The project would involve the demolition of Units 1–4 and associated structures and systems, the bearing cooling tower foundation, skim pond, and four concrete foundations of demolished cooling towers within the VGS property boundaries. It would not include recreational facilities or require the construction or expansion of recreational facilities. No impact would occur.

3.17 Transportation

Would the project:	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
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?	☐	☐	☒	☐

This section analyzes the potential construction-related (temporary) impacts of the project based on CEQA Guidelines Section 15064.3(b), which focuses on newly adopted criteria (vehicle miles traveled or VMT) pursuant to SB 743 for determining the significance of transportation impacts. Pursuant to SB 743, the focus of transportation analysis changed from level of service (LOS) or vehicle delay to VMT. The related updates to the CEQA Guidelines required under SB 743 were approved on December 28, 2018. As stated in CEQA Guidelines Section 15064.3(c), the provisions of Section 15064.3 shall apply prospectively, and a lead agency may elect to be governed by the provisions of Section 15064.3 immediately. The VMT approach was required to be implemented statewide by July 1, 2020.

The project site and the surrounding roadway network are located in the City of Los Angeles. The City has adopted the new transportation criteria and thresholds, to include VMT analysis requirements per CEQA Guidelines Section 15064.3(b) in their respective transportation analysis guidelines. Additionally, guidance provided in the California Governor's Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR 2018) was also utilized to determine a project's transportation impact. A project's VMT analysis follows the process of first using screening criteria, identifying an efficiency metric, identifying the significance threshold, and determining requirements for modeling and assessment. It should be noted that OPR and the City of Los Angeles do not require a quantitative assessment of VMT generated by construction traffic and have not adopted a significance threshold for construction projects. Therefore, this section includes a qualitative analysis of proposed project's VMT.

Screening Criteria for Transportation Assessment

Per City of Los Angeles Transportation Analysis Guidelines, July 2019, a Transportation Assessment would generally be required for any development project that is estimated to generate a net increase of 250 daily permanent trips (LADOT 2019). As such the proposed project would primarily generate temporary construction traffic and nominal operational traffic, hence would not warrant a Transportation Assessment per LADOT requirements.

Nonetheless, a Construction Traffic Analysis of the roadway network identified in the project area conducted by Dudek is included in Appendix F for informational purposes.

Existing Conditions

Characteristics of the existing street system in the study area are shown in Table 14. Figure 5, Project Site Location and Study Area, shows the study intersection assessed in the Construction Traffic Analysis (Appendix F). Additionally, Figure 6, Existing Traffic Control and Geometries, and Figure 7, Existing Traffic Volumes, depict additional existing conditions in the study area.

Table 14. Study Area Existing Street System Summary

Roadway	Street Classification	Posted Speed Limit (mph)	No. of Travel Lanes	Parking	Sidewalks	Existing Bicycle Lanes
Glenoaks Boulevard	Boulevard II	50	4 lanes with center turn lane	Some sections/Time restrictions	Yes	Yes
San Fernando Road	Avenue I	35	4 lanes	Some sections	Yes (along eastern side of the street)	No
Sheldon Street	Avenue II	40	4 lanes with center turn lane	Some sections	Yes	No

Source: LADCP 2017.

Transit Network

The Los Angeles County Metropolitan Transportation Authority (LA Metro) provides transit service in the area.

LA Metro Routes 794 and 94 operate along San Fernando Road and connect Downtown LA with Sylmar Station and Downtown LA with Sun Valley, respectively. The service is available approximately every 20 minutes on both routes. The Route 94 operates on all weekdays and weekends and Route 794 operates only on weekdays. Route 224 operates along San Fernando Road and connects Studio City Station with Olive View Medical Center in Sylmar. The service is available approximately every 25 minutes. The Route 224 operates on all weekdays and weekends.

LA Metro Route 166/364 operates along Glenoaks Boulevard and connects Chatsworth Station with Sun Valley. The service is available approximately at an interval of 15-20 minutes. The Route 166/364 operates on all weekdays while Route 166 operates on weekends and holidays.

The nearest bus stop to the proposed project is located at the southwest corner of the San Fernando Road/Sheldon Street intersection.

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

Less-Than-Significant Impact. The following section provides an assessment of construction related project traffic and its effect on the circulation system.

Trip Generation

The Institute of Transportation Engineers' *Trip Generation* manual (ITE 2017) does not contain trip rates for the construction-related activities; therefore, project's general construction phasing and schedule as shown in Appendix F, was utilized to estimate the proposed project's construction traffic generation. Based on the estimated average number of workers, vendor, and haul truck trips across the various phases and months of the proposed project, the Peak Construction Year period was identified. During this Peak Construction Year period (demolition activities), the maximum number of daily on-site workers would be 112 workers and the maximum number of trucks would be 1 vendor truck and 14 haul trucks.

Based on the construction hour, most workers would likely arrive at the construction site before 6:00 a.m. and leave after 3:00 p.m. Therefore, approximately 90% of the workers were assumed to arrive before the AM peak hour, and a same percentage was assumed to depart during the peak hours. The daily off-site truck trips would generally be distributed throughout the work day. Based on these assumptions, Table 15 provides projects' trip generation for the Peak Construction Year phase and Figure 8, Peak Construction Year Traffic Volumes, shows these trips at the study area intersections.

Table 15. Peak Construction Trip Generation

Vehicle Type	Daily Quantity	Daily Trips	AM Peak Hour			PM Peak Hour		
			In	*Out*	*Total*	*In*	*Out*	*Total*
Trip Generation								
Workers[1]	112 workers	224	11	0	11	0	101	101
Vendor Trucks[2]	1 truck	2	1	0	1	0	1	1
Haul Trucks[3]	14 trucks	28	2	2	4	2	2	4
	Total	**254**	**14**	**2**	**16**	**2**	**104**	**106**
Trip Generation with PCE								
Workers (1.0 PCE)	112 workers	224	11	0	11	0	101	101
Vendor Trucks (2.0 PCE)	1 truck	4	2	0	2	0	2	2

Table 15. Peak Construction Trip Generation

Vehicle Type	Daily Quantity	Daily Trips	AM Peak Hour			PM Peak Hour		
			In	*Out*	*Total*	*In*	*Out*	*Total*
Haul Trucks (3.0 PCE)	14 trucks	84	6	6	12	6	6	12
	Total (with PCE)	**312**	**19**	**6**	**25**	**6**	**109**	**115**

Note: PCE = passenger car equivalent.

1 Workers are assumed to utilize passenger cars and no carpooling is assumed. Based on working hours 6:00 a.m. to 3:00 p.m., approximately 10% of the workers are assumed to arrive during the AM and 90% depart during the PM peak hour.

2 Vendor trucks are assumed to be distributed evenly across the 8-hour work shift to estimate AM and PM peak hour trips.

3 Haul truck trips are distributed evenly over the duration of construction phase to estimate daily haul truck trips and across the 8-hour work shift to estimate AM and PM peak hour trips.

As shown in Table 15, the project would generate approximately 254 daily trips, 16 AM peak hour trips (2 inbound and 14 outbound), and 106 PM peak hour trips (2 inbound and 104 outbound). With the application of a passenger-car-equivalent factor to truck trips, the proposed project would generate approximately 312 passenger-car-equivalent daily trips, 25 passenger-car-equivalent AM peak hour trips (19 inbound and 6 outbound), and 115 passenger-car-equivalent PM peak hour trips (6 inbound and 109 outbound).

Trip Distribution and Assignment

Temporary staging and laydown areas for construction materials and equipment, as well as parking for construction workers would be accommodated within the project site. Worker and employee vehicle parking would also be accommodated within the project site for most of the construction duration. Construction traffic was distributed to the study area intersections and roadway segments based on logical commute routes for workers, and the nearest freeway access with truck routes for construction-related trucks. Construction related trips were assigned to the study area intersections by applying the project trip generation estimates to the trip distribution percentages at each study area intersection and roadway segments.

Worker traffic is anticipated to access the project site via Old San Fernando Road and Sheldon Street (full access). The truck traffic would not be routed to the project site via the San Fernando Road/Sheldon Street intersection. This intersection does not allow adequate storage length that would be needed for trucks to make an eastbound left turn at the rail road crossing of San Fernando Road/Sheldon Street in order to turn onto Old San Fernando Road. Therefore, the trucks would be routed to access the project site via the Glenoaks Boulevard/Sheldon Street intersection. All truck traffic will likely enter the study area from I-5 and use the interchanges at Tuxford Street and Sunland Boulevard. A number of landfill and recycling sites are located within 2 miles of the project site. Therefore, the trucks from the project site would be hauling material to those sites. The project trip distribution and assignment for workers is shown in Figure 9, Project Trip Distribution and Assignment-Workers, while the project trip distribution and assignment for trucks is shown in Figure 10, Project Trip Distribution and Assignment-Trucks. Figure 11, Total Project Trip Assignment, shows the total project trip assignments, at the study area intersections.

SOURCE: NAIP 2016; LADWP 2017

Los Angeles Department of Water & Power

0 1,000 2,000 Feet

FIGURE 5

Project Site Location and Study Area

Valley Generating Station

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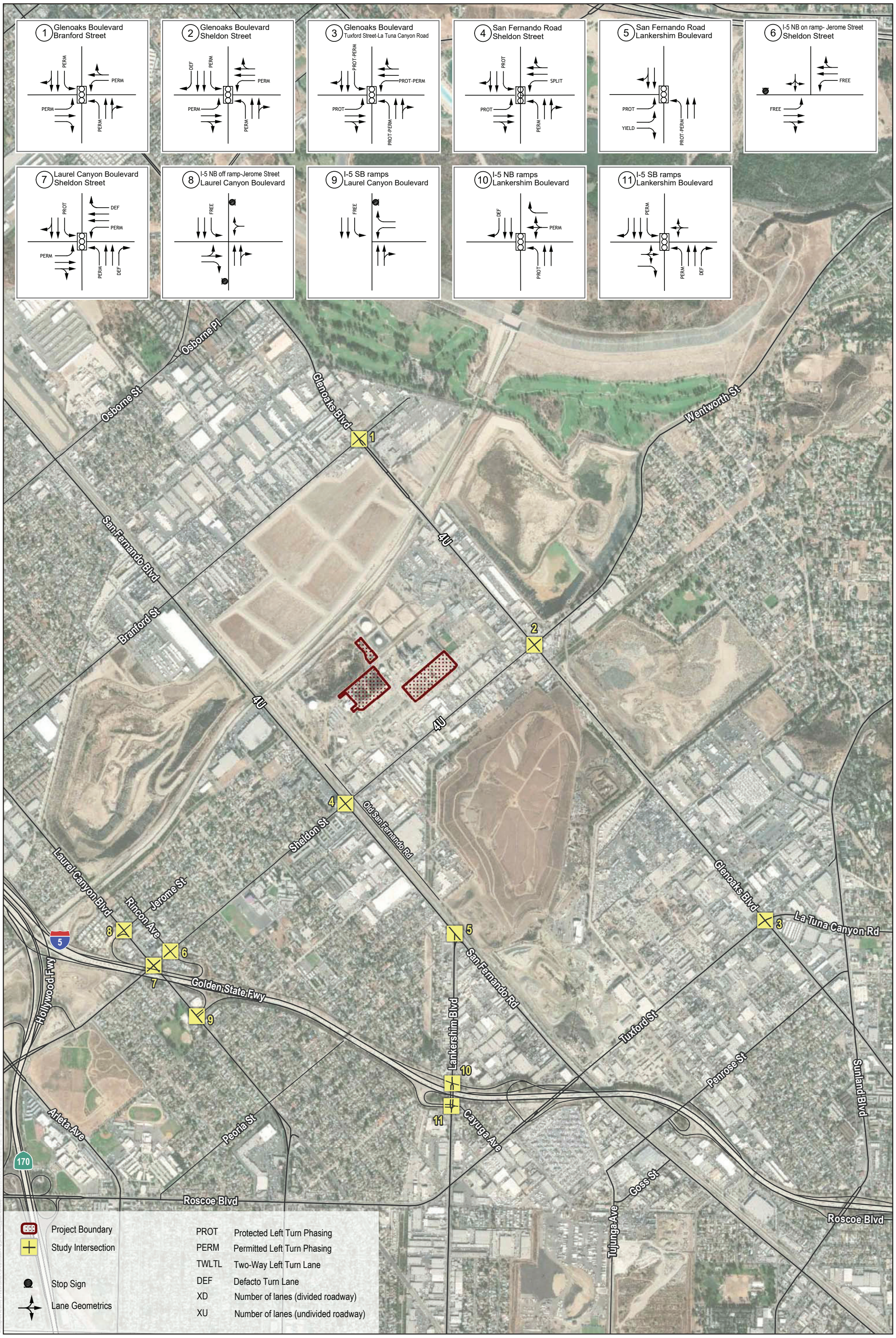

SOURCE: Esri and Digital Globe, OpenStreetMap 2019

LA DWP Los Angeles Department of Water & Power

0 0.125 0.25 Miles

FIGURE 6

Existing Traffic Control and Geometrics

Valley Generating Station

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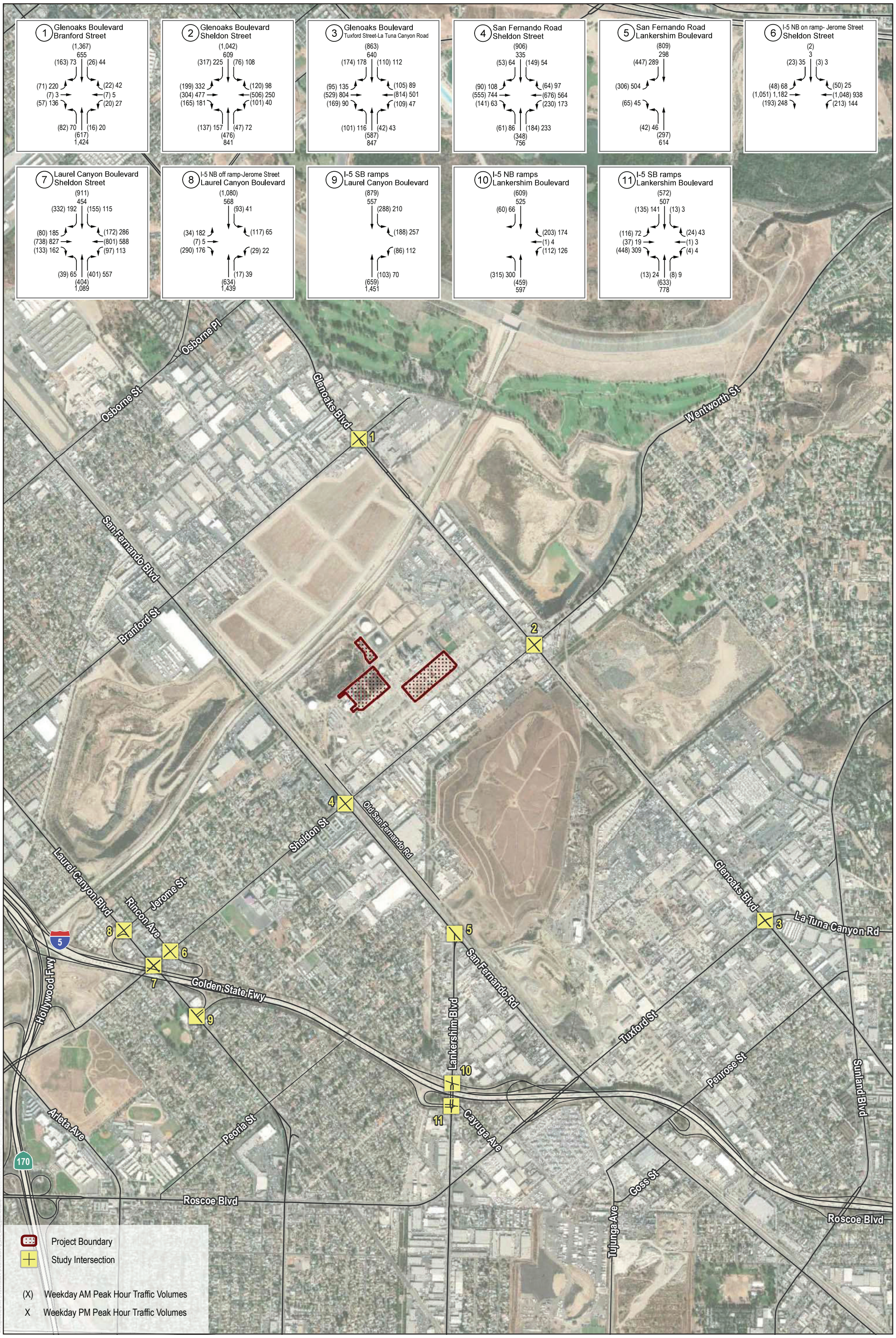

SOURCE: Esri and Digital Globe, OpenStreetMap 2019

Los Angeles Department of Water & Power

0 0.125 0.25 Miles

FIGURE 7

Existing Traffic Volumes

Valley Generating Station

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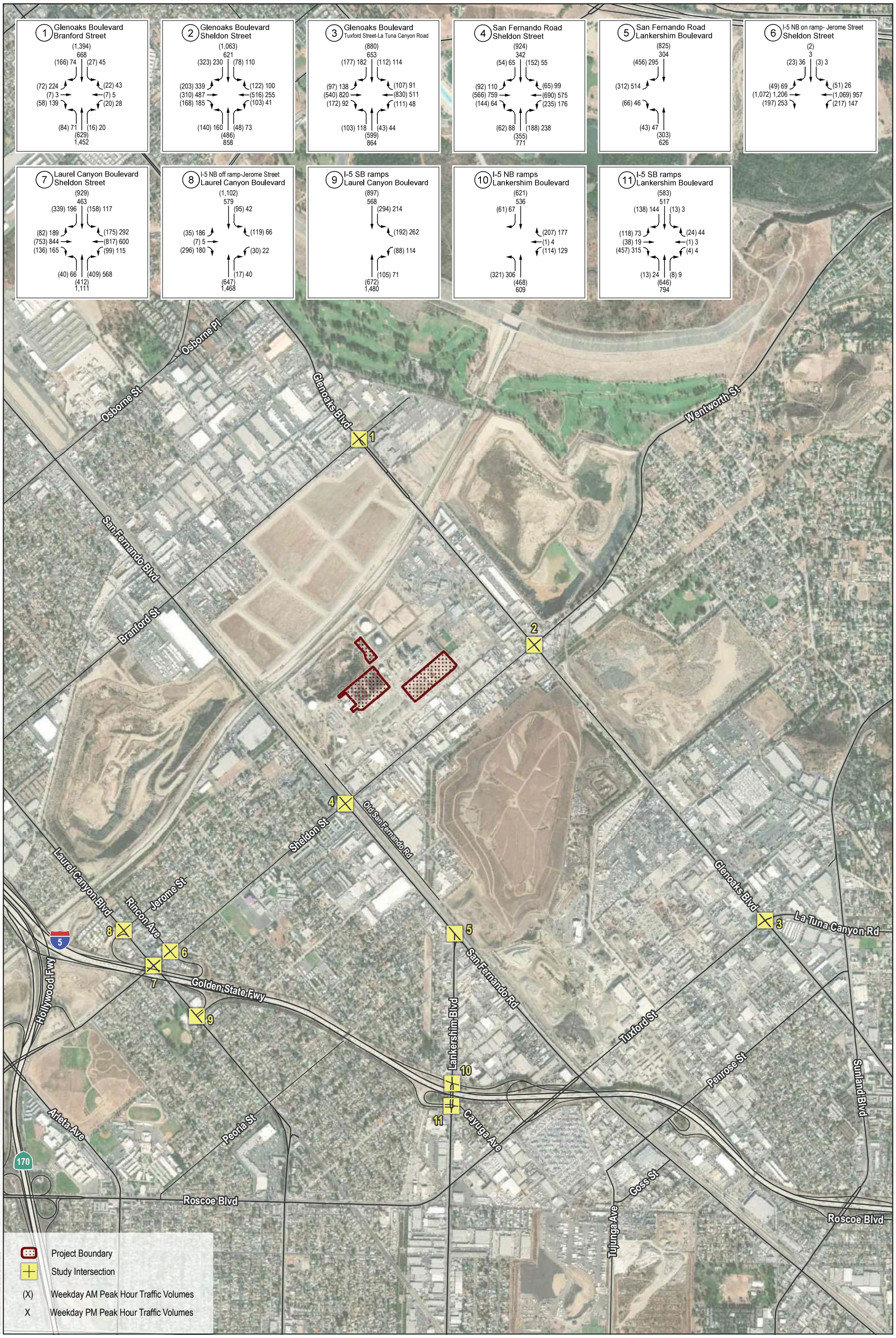

SOURCE: Esri and Digital Globe, OpenStreetMap 2019

LA DWP Los Angeles Department of Water & Power

0 0.125 0.25 Miles

FIGURE 8

Peak Construction Year Traffic Volumes

Valley Generating Station

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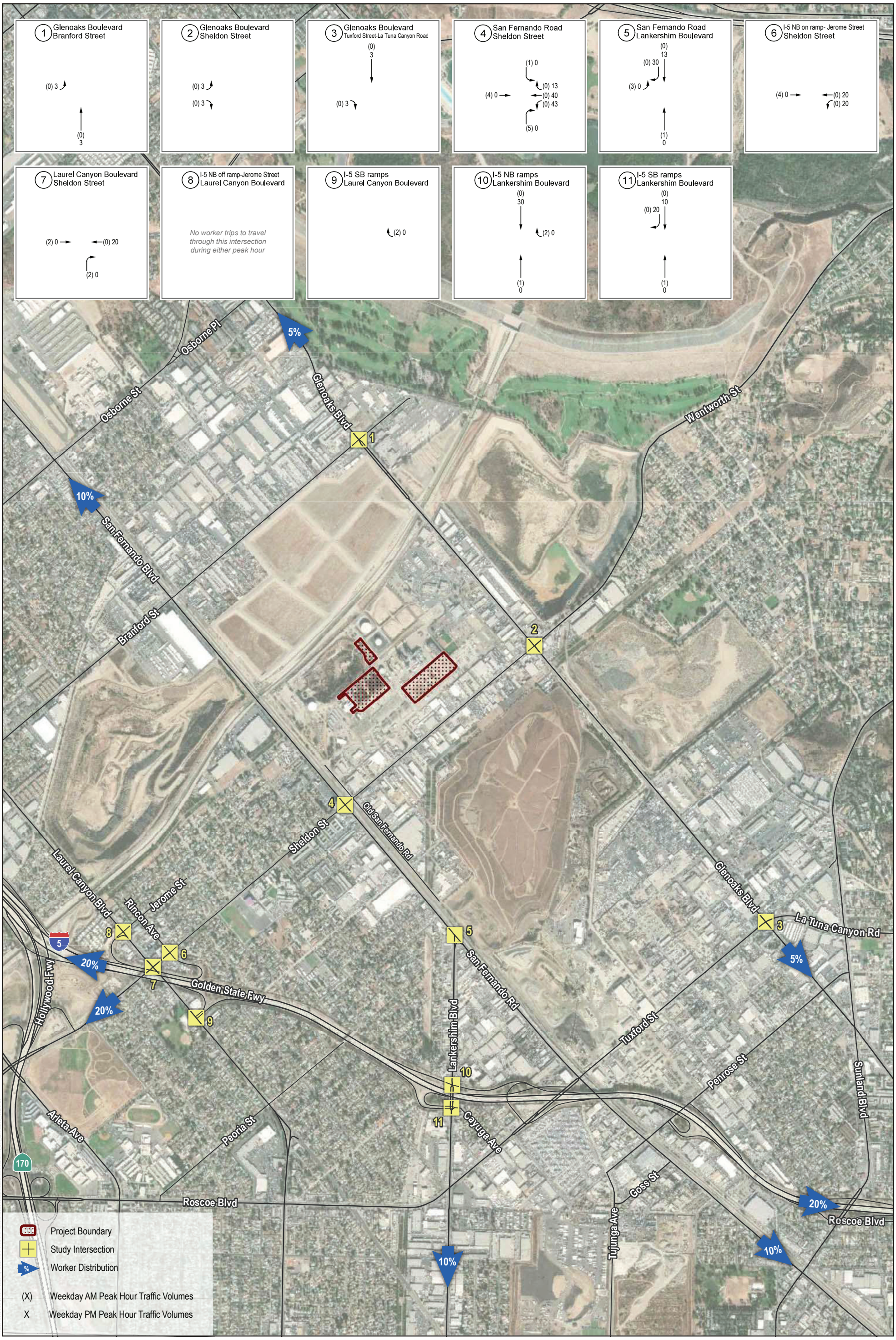

SOURCE: Esri and Digital Globe, OpenStreetMap 2019

Los Angeles Department of Water & Power

0 0.125 0.25 Miles

FIGURE 9

Project Trip Distribution and Assignment-Workers

Valley Generating Station

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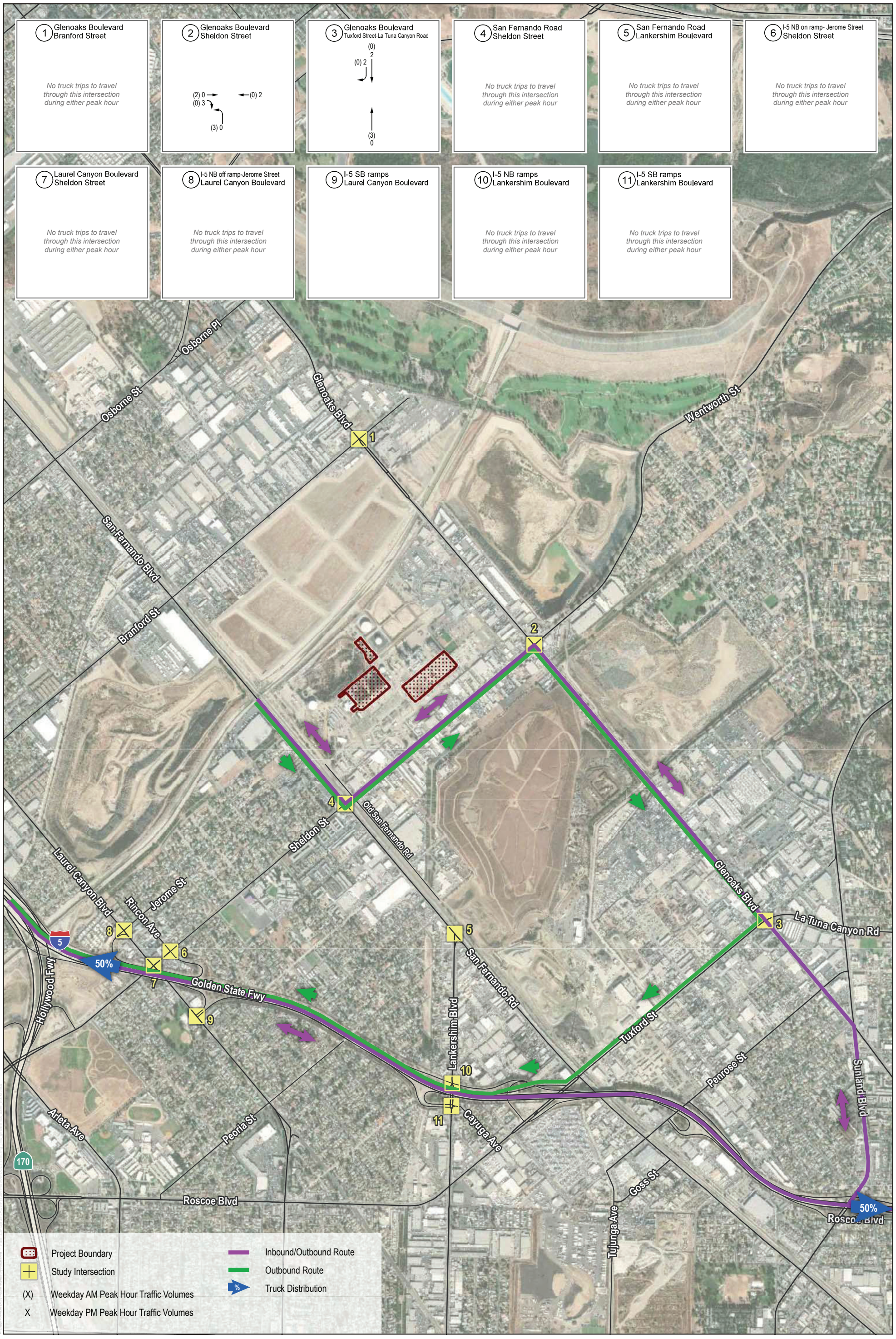

SOURCE: Esri and Digital Globe, OpenStreetMap 2019

LA DWP Los Angeles Department of Water & Power

0 0.125 0.25 Miles

FIGURE 10

Project Trip Distribution and Assignment-Trucks

Valley Generating Station

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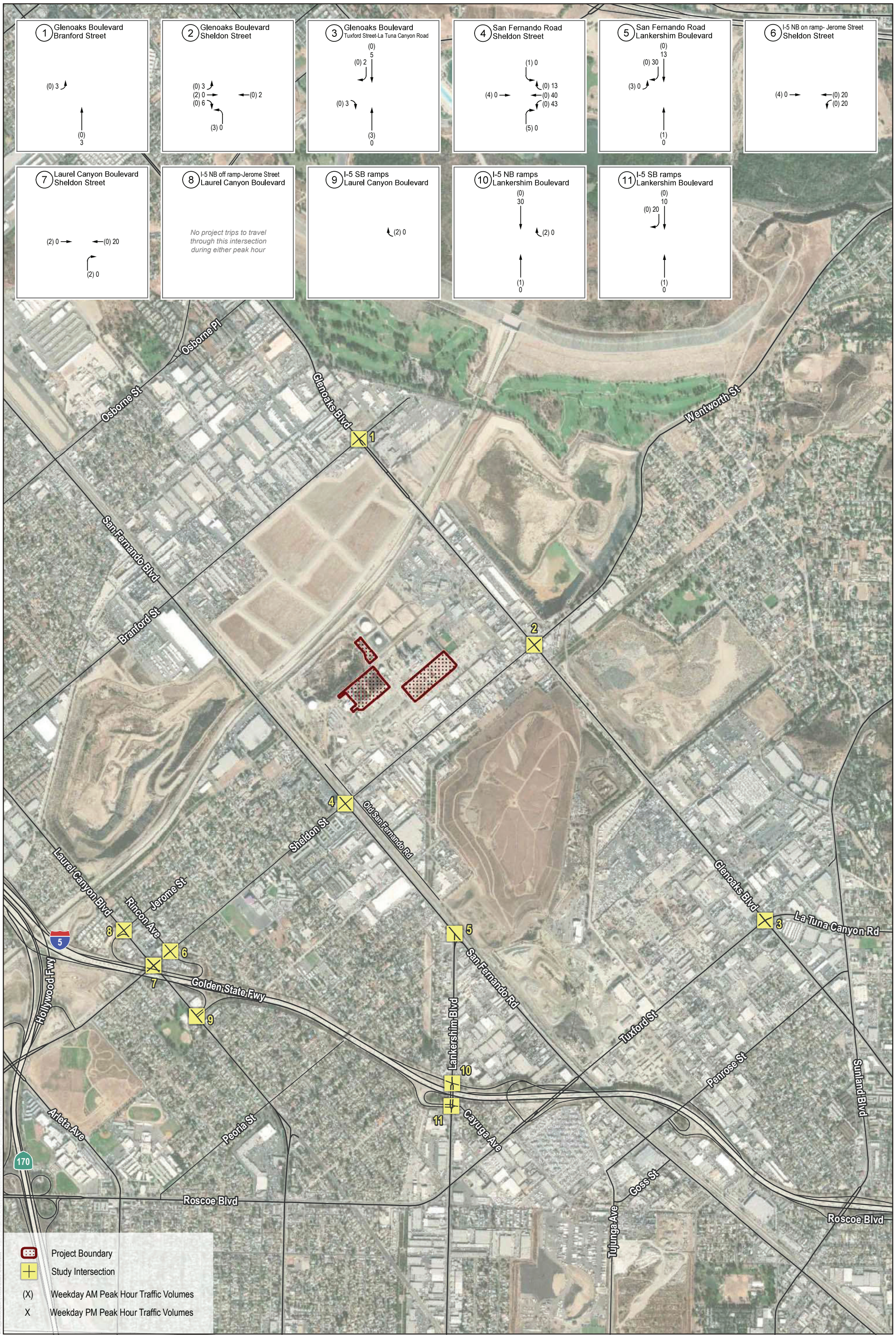

SOURCE: Esri and Digital Globe, OpenStreetMap 2019

LA DWP Los Angeles Department of Water & Power

0 0.125 0.25 Miles

FIGURE 11

Total Project Trip Assignment

Valley Generating Station

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Existing plus project traffic and peak construction year plus project traffic volumes are shown in Figures 12 and 13, respectively. The proposed project would generate temporary construction trips and not add permanent trips to the roadway facilities in its vicinity or conflict with any transit, bicycle and pedestrian facility. Therefore, the proposed project would not conflict with adopted policies, plans, or programs regarding transit, bicycle, and pedestrian facilities, and impacts would be **less than significant**.

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

Less-Than-Significant Impact. CEQA Guidelines Section 15064.3, subdivision (b), focuses on newly adopted criteria (vehicle miles traveled) for determining the significance of transportation impacts. It is further divided into four subdivisions: (1) land use projects, (2) transportation projects, (3) qualitative analysis, and (4) methodology. The proposed project involves demolition of existing structures that would generate temporary construction-related traffic, and therefore would be categorized under subdivision (b)(3), qualitative analysis. Subdivision (b)(3) recognizes that lead agencies may not be able to quantitatively estimate vehicle miles traveled for every project type. In those circumstances, this subdivision encourages lead agencies to evaluate factors such as the availability of transit, proximity to other destinations, and other factors that may affect the amount of driving required by the project.

The updated CEQA Guidelines do not establish a significance threshold; however, the City of Los Angeles has recommended a threshold of significance for land use development (residential, office, and other land uses) and transportation projects. It should be noted that there is no significance threshold for construction or maintenance projects.

Using approximate trip lengths for worker commute, delivery, and haul trips, VMT for the overall project has been estimated using default values for the region from CalEEMod, which was used to estimate the project's air quality and GHG emissions. Construction-related trips are temporary and would not generate permanent trips. Therefore, the VMT from construction is not required to be quantified. Further, the project construction would be consistent with construction activities in terms of the temporary nature of activities, trip generation characteristics, and the types of vehicles and equipment required. Even though some of the workers could carpool to the site, managing worker and truck trip lengths for the construction projects is not feasible because of the remote location and duration of individual activities. Alternative modes of transportation to and from the project site are also generally not available to construction workers.

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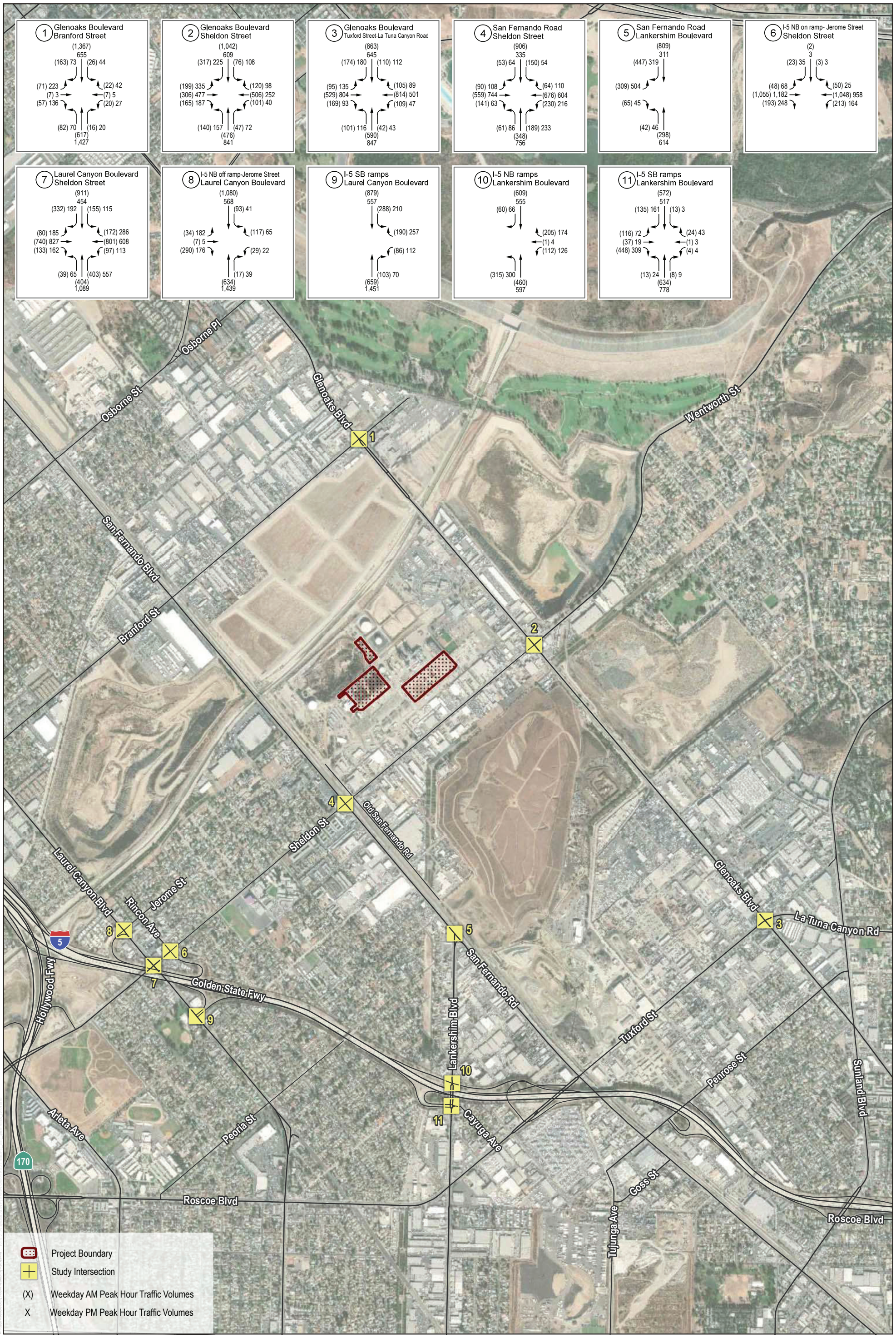

SOURCE: Esri and Digital Globe, OpenStreetMap 2019

LA DWP Los Angeles Department of Water & Power

0 0.125 0.25 Miles

FIGURE 12

Existing Plus Project Traffic Volumes

Valley Generating Station

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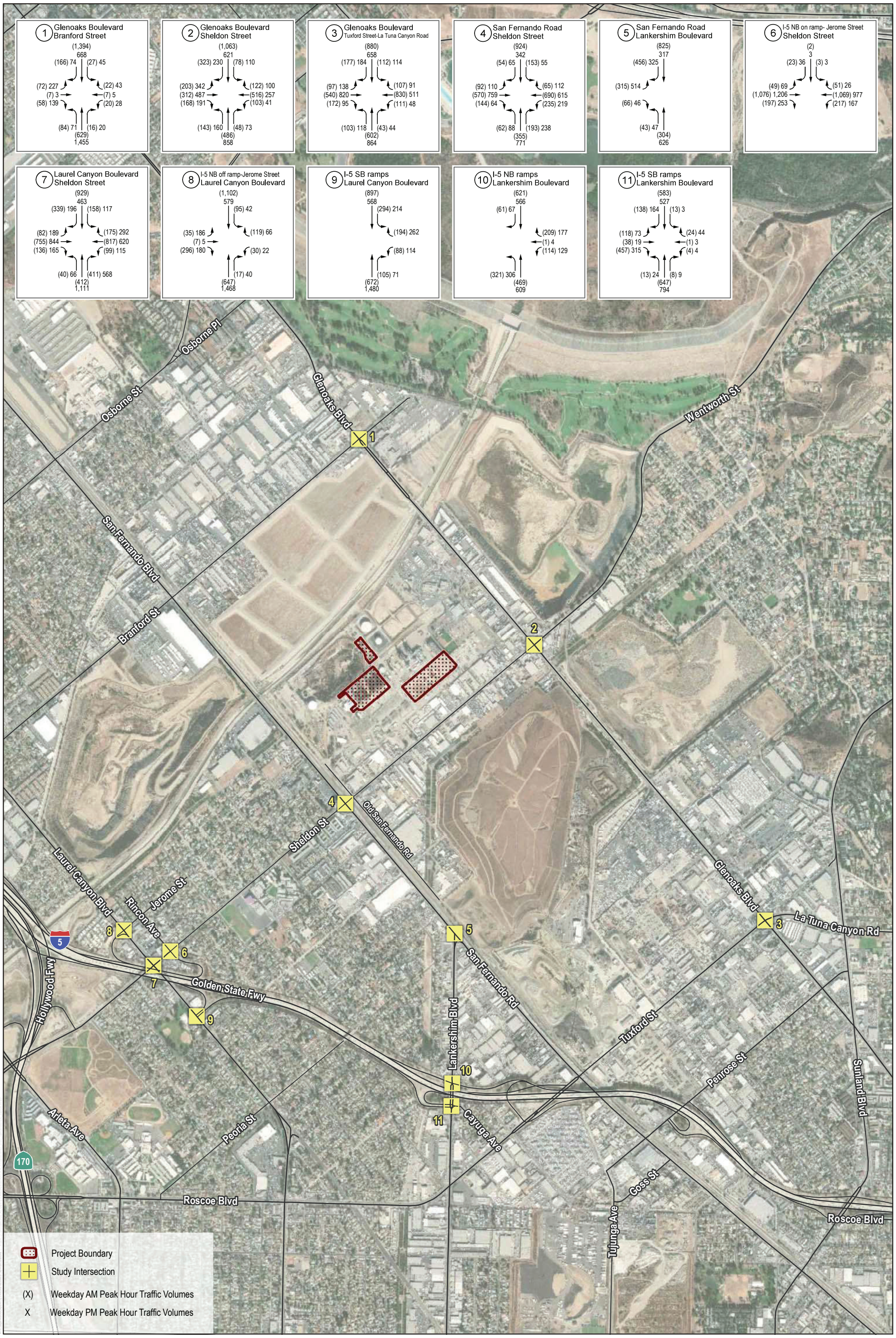

SOURCE: Esri and Digital Globe, OpenStreetMap 2019

LA DWP Los Angeles Department of Water & Power

0 0.125 0.25 Miles

FIGURE 13

Peak Construction Year Plus Project Traffic Volumes

Valley Generating Station

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Vehicle-trip generation (for workers and trucks) as a result of project construction has been summarized in Table 15. Per OPR, heavy vehicle traffic is not required to be included in the estimation of a project's VMT. As noted above, worker and truck trips would generate VMT, but once construction is completed, the construction-related traffic would cease, and VMT would return to pre-project conditions. Measures to reduce the VMT generated by construction workers and trucks are limited, and there are no thresholds or significance criteria for temporary, construction-related VMT. Additionally, construction-related VMT would be temporary and short term. Further, it should be noted that OPR and the City of los Angeles do not require quantitative assessment of temporary construction traffic. As mentioned previously, because the project would not generate any new permanent maintenance trips, the proposed project would have a less-than-significant VMT impact.

Therefore, the proposed project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b), and impacts 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)?

Less-Than-Significant Impact. The proposed project would not include any new roadway design features, nor would it alter any existing geometric design features. Access for construction related traffic (workers and trucks) to the project site would be via the existing driveway along Old San Fernando Road and most of the construction activities would occur on the project site itself. Old San Fernando Road access to the site would operate as a full access driveway. During construction, if needed, temporary staging and laydown areas for construction materials and equipment would be accommodated within the project site. Worker vehicle parking would also be accommodated within the project site. The volume of truck traffic during the Peak Construction Year phase is estimated to be low (15 trucks per day) and would not be a potential safety hazard to construction workers and/or the public. Also, the truck traffic would not be routed to the project site via the San Fernando Road/Sheldon Street intersection. This intersection does not allow adequate storage length that would be needed for trucks to make an eastbound left turn at the railroad crossing of San Fernando Road/Sheldon Street in order to turn onto Old San Fernando Road. The trucks would be routed to access the project site via the Glenoaks Boulevard/Sheldon Street intersection. Additionally, to avoid operational deficiencies and vehicular queuing at the deficient intersections identified at San Fernando Road/Sheldon Street and I-5 northbound on ramp-Rincon Avenue/Sheldon Street, during the PM peak hour of the peak construction phase, some of the outbound worker traffic would use an alternate project access driveway (i.e., Main Gate) along Sheldon Street. As such, motorists/trucks entering and exiting the project site would be able to do so comfortably and safely, from the Old San Fernando Road during all non-peak construction phases. Therefore, project would not substantially increase hazards due to a roadway design feature. With the implementation of **PDF-TRAF-1: Use of Alternate Project Access**, the proposed project's impact would be **less than significant**.

d) Would the project result in inadequate emergency access?

Less-Than-Significant Impact. The project site is located in an established, developed area with ample access for emergency service providers. The LOS for all the study area intersections analyzed in the traffic analysis are summarized under Threshold (a). The analysis shows that the project would contribute to operational deficiency at the I-5 northbound on ramp-Rincon Avenue/Sheldon Street and San Fernando Road/Sheldon Street intersections. This effect would be mitigated with the implementation of **PDF-TRAF-1: Use of Alternate Project Access**. As previously discussed, all construction related traffic would access the project site via existing driveway along Old San Fernando Road, and most of the construction activities would occur on project site. Therefore, the project would not have the potential to result in temporary lane closures on any roadway, and two-way traffic would be maintained along all roadways around the site throughout construction. As such, construction impacts to emergency access would be **less than significant**.

PDF-TRAF-1

The following measure is recommended to address the (temporary) traffic effects of the proposed project at the study area intersections:

PDF-TRAF-1 **Use of Alternate Project Access**: For the duration of peak construction phase (anticipated to occur during the overlap of construction phases with demolition of Units 3 and 4), the project Construction Manager/Contractor shall allow the construction-related worker traffic to use an alternate exit (Main Gate) from the site located along Sheldon Street, during the PM peak hour. The Contractor shall install a sign prohibiting right turns out of the Main Gate along Sheldon Street to ensure that the outbound traffic turns left and travels east along Sheldon Street during the PM peak hour (3:00 p.m.–6:00 p.m.). With fewer workers being allowed to utilize an alternate exit during the PM peak hour, the proposed project would not contribute to or cause a hazardous condition at the San Fernando Road/Sheldon Street intersection and operational deficiencies at the Interstate (I) 5 northbound on-ramp–Rincon Avenue/Sheldon Street, I-5 northbound off-ramp–Jerome Street/Laurel Canyon Boulevard, and I-5 southbound ramps/Laurel Canyon Boulevard intersections.

References Cited

ITE (Institute of Engineers). 2017. *Trip Generation Manual*, 10th Edition, September 2017.

LADCP (Los Angeles Department of City Planning). 2019. Los Angeles City Planning Website. Accessed November 2019. https://planning.lacity.org/.

LADOT (Los Angeles Department of Transportation). 2016. *Transportation Impact Study Guidelines*. December 2016.

LADOT (Los Angeles Department of Transportation). 2019. *Transportation Assessment Guidelines*. July 2019.

OPR (Governor's Office of Planning and Research). 2018. Technical Advisory on Evaluating Transportation Impacts in CEQA.

3.18 Tribal Cultural Resources

Would the project:	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) 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.	☐	☒	☐	☐

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 previously discussed in Section 3.5, Cultural Resources, a California Historical Resources Information System records search was conducted for the project site. No previously recorded tribal cultural resources (TCRs) listed in the California Register of Historical Resources or a

local register were identified within the project site. Further, no TCRs have been identified by California Native American tribes as part of the City's AB 52 notification and consultation process (see Section 3.18(a)(ii) below for a description of this process). Therefore, the project would not adversely affect TCRs that are listed or eligible for listing in the state or local register. Impacts are considered less than significant, and no mitigation is required.

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. On February 13, 2019, a search of the SLF from the NAHC was requested. A response letter was received via email from the NAHC on February 20, 2019, stating that the results of the SLF search failed to indicate the presence of Native American cultural resources in the immediate project site; though they stated that negative results do not preclude the presence of Native American cultural resources within the project site. The NAHC also provided a list of nine Native American groups and individuals who are traditionally or culturally affiliated with the geographic area of the project, and may have direct knowledge of Native American cultural resources in the project site. Documents related to the NAHC SLF search are included in Appendix C.

The project is subject to compliance with AB 52 (PRC, Section 21074). AB 52 requires consideration of impacts to TCRs as part of the CEQA process and requires LADWP, as the lead agency, to notify any groups that are traditionally or culturally affiliated with the geographic area of the project and who have requested notification of the project. As a part of the government-to-government consultation efforts pursuant to AB 52, LADWP notified Native American representatives (that have requested notification) who are traditionally or culturally affiliated with the geographic area of the project, inviting the tribes to consult on the project. On July 2, 2019, LADWP sent notification letters via certified mail and follow up emails to all nine NAHC-listed California Native American Tribal representatives, including the Gabrieleño Band of Mission Indians-Kizh Nation, Gabrieleño Tongva San Gabriel Band of Mission Indians, Gabrielino Tongva Indians of California Tribal Council, Gabrielino/Tongva Nation, Gabrielino-Tongva Tribe, San Fernando Band of Mission Indians, and Fernandeño Tataviam Band of Mission Indians. To date, three responses have been received, one from Gabrieleno Band of Mission Indians-Kizh Nation, and two separate contacts from the Fernandeño Tatavium Band of Mission Indians (FTBMI) as a result of LADWP's AB 52 notification efforts. After several follow up attempts to coordinate consultation, no consultation occur with the Administer of Gabrieleno due to their lack of response on availability for consultation. Beverly Salazar, of FTBI, called LADWP to discuss the project, offering monitoring services and stated that the project site is in the general areas

of their tribal dwelling, however, she did not indicate any particular concerns with the project, and did not desire any further formal consultation. Jairo Avila, of the FTBMI did request formal consultation and LADWP Environmental Project Manager consulted with Mr. Avila on 7/17/2019. In addition, in a follow up email, Mr. Avila stated that the project is located in a sensitive area within the traditional Tatavium ancestral territory, though the FTBMI did not provide any specific information pertaining to the identification of any TCRs within the project site. However, FTBMI indicates that there is a potential to encounter TCRs as a result of project demolition activities. As part of the AB 52 consultation, the FTBMI recommended mitigation that would reduce potential impacts to unanticipated TCRs. The MM-TCR 1 to 3 below provides the mitigation language that is similar in essence to the language proposed by Mr. Avila. All records of correspondence related to AB 52 notification and subsequent consultation information are on file with LADWP.

The project site has been extensively disturbed as a result of the development and maintenance of the Valley Generating Station, and any surficial and/or subsurface evidence of TCRs that may be present within the site have likely been disturbed or destroyed. Nonetheless, it is possible that intact TCRs are present at subsurface depths that were not earlier impacted by the current on-site development. For this reason, the project site should be treated as potentially sensitive for TCRs. MM-CUL-1 is recommended to reduce potential impacts to unanticipated archaeological resources. Additionally, MM-TCR-1, MM-TCR-2 and MM-TCR-3 would reduce potential impacts to unanticipated TCRs to below a level of significance. With the incorporation of these mitigation measures, impacts associated with TCRs and human remains of Native American origin, would be less than significant.

MM-TCR-1 While no tribal cultural resources (TCRs) have been identified that may be affected by the project, the following approach for the inadvertent discovery of TCRs has been prepared to ensure there are no impacts to unanticipated resources. Should a potential TCR be encountered during construction activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease, the lead agency shall be notified, and a qualified archaeologist meeting Secretary of Interior standards shall assess the find. The lead agency will notify Native American tribes consulting under Assembly Bill (AB) 52, that have requested to be notified, if any such find occurs. The archaeologist shall complete all relevant California State Department of Parks and Recreation 523 Series forms to document the find and submit this documentation to the applicant, lead agency, and the tribes consulting under AB 52.

MM-TCR-2 The lead agency shall, in good faith, consult with the tribes consulting under Assembly Bill (AB) 52 on the disposition and treatment of any tribal cultural resources (TCRs) encountered during the project grading.

MM-TCR-3 If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease, the lead agency notified and the county coroner shall be contacted immediately. If the human remains are, or believed to be, Native American in origin by the county coroner, he or she shall notify the Native American Heritage Commission (NAHC) in Sacramento within 24 hours. In accordance with California Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendant (MLD) from the deceased Native American. The MLD shall complete his/her inspection within 48 hours of being granted access to the site. The designated MLD would then determine, in consultation with the property owner, the disposition of the human remains.

3.19 Utilities and Service Systems

Would the project:	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
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?	☐	☐	☒	☐

Would the project:	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

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 project would involve demolition of Units 1–4 and associated structures and systems, the bearing cooling tower foundation, skim pond, and four concrete foundations of demolished cooling towers within the VGS property boundaries. The project does not involve the development of additional permanent facilities on site. Thus, the project would not result in an increase in wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities demand. Further, stormwater drains and a catchment device are located along the boundaries of properties adjacent to the VGS site. One catchment device is located southwest of the project site along a neighboring light industrial property on San Fernando Street; one storm drain is located on the corner of the same adjacent property; and two additional storm drains are on the corner of San Fernando and Sheldon Street. After the extraction of substructures, the project site would be backfilled with crushed concrete. Therefore, the project would not influence a change in water volume or flow. As such, the project would not result in the relocation or construction of new or expanded facilities. Thus, impacts 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. The project would involve the demolition and removal of structures within the VGS property boundaries. Although water would be used to suppress dust in compliance with SCAQMD Rule 403, the project would not require large amounts of water for dust suppression purposes. The project does not involve the construction of additional permanent facilities or uses on the project site. At least one prefabricated trailer would be added to the site to house existing LADWP employees and would not result in an increase in the number of employees on site. Therefore, the addition of the trailer(s) is not expected to result in a substantial increase in water use on site since existing employees who would otherwise occupy the existing administrative building would occupy the trailer(s). Thus, the project would not result in a substantial increase in water demand. As such, there would be no impact to water supply for future development during normal, dry, and multiple dry years. Therefore, no impact would occur.

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?

No Impact. The project would involve demolition and removal of structures within the VGS property boundaries. The project does not involve the development of additional permanent facilities on site. At least one prefabricated trailer would be added to the site to house existing LADWP employees and would not result in an increase in the number of employees on site. Therefore, the addition of the trailer(s) is not expected to result in a substantial increase in wastewater produced on site since existing employees who would otherwise occupy the existing administrative building would occupy the trailer(s). Thus, there would be no substantial increase in wastewater treatment demand as a result of the project. As such, the project would result in a less than significant impact to the wastewater treatment system.

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. The project would involve demolition and removal of structures within the VGS property boundaries. Demolition of the units would generate various types of waste: steel, concrete, hazardous waste, and general waste. Construction debris would be recycled or transported to a landfill and disposed of appropriately. In accordance with AB 939, LADWP's construction contractor would ensure that source reduction techniques and recycling measures are incorporated into project construction. LADWP estimates that the project would generate 83,552 cubic yards of construction waste over the approximately 31-month project timeline.

Hazardous waste would be transported by a licensed hazardous waste transporter to a permitted hazardous waste disposal facility. There are currently two Class I (hazardous waste) landfills located in California, and hazardous wastes can also be transported to permitted facilities outside California. Steel that can be reused would be sold on the open market.

Several landfills throughout the County could serve the project, as listed in Table 16. The total permitted throughput for all landfills is 37,075 cubic yards per day, and approximately 180 million cubic yards of capacity remain (County of Los Angeles 2017). Based on the estimate of constructions waste to be generated during the approximately 31-month project, 83,552 cubic yards represents approximately 0.04% of the remaining capacity of existing Los Angeles County landfills.

Table 16. Existing Landfills

Landfill	Location	Estimated Closing Year	Maximum Permitted Daily Load (cubic yards per day)	Current Remaining Capacity (cubic yards)
Antelope Valley Landfills I and II	Palmdale	2039	4,800	16,477,719
Calabasas Landfill	Unincorporated Area	2029	7,795	12,479,558
Chiquita Canyon Landfill	Unincorporated Area	2047	6,730	60,122,338
Lancaster Landfill	Unincorporated Area	2041	4,000	13,696,358
Sunshine Canyon Landfill	Los Angeles/ Unincorporated Area	2037	13,750	77,314,124
		Total	**37,075**	**180,090,097**

Source: County of Los Angeles 2017.

Hazardous waste removal at each unit would primarily involve asbestos and lead abatement. The project would involve removal of 3,814 cubic yards of hazardous waste material from the site. There are currently two Class I (hazardous waste) landfills located in California, as listed in Table 17. The current remaining capacity for the California Class I landfills is 17,468,595 cubic yards (CalRecycle 2019a, 2019b). Based on the estimate of hazardous waste to be generated during the 31-month project, 3,814 cubic yards represents approximately 0.02% of the remaining capacity available in California Class I landfills.

Table 17. Existing Class I Landfills

Landfill	Location	Estimated Closing Year	Maximum Permitted Daily Load (tons per day)	Current Remaining Capacity (cubic yards)
Clean Harbors	Buttonwillow City	January 1, 2040	10,500	NA
Chemical Waste Management Inc.	Kettleman City	January 1, 2030	2,000	17,468,595
		Total	**12,500**	**17,468,595**

Source: CalRecycle 2019a, 2019b.
Notes: NA = not applicable.

The amount of waste generated during project construction is not expected to exceed state or local standards, significantly impact landfill capacities, or otherwise impair the attainment of solid waste reduction goals. Thus, project would result in a less-than-significant impact related to solid waste.

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

No Impact. As discussed above, the project would generate various types of solid waste. In relation to the local management and reduction techniques, handling, and disposal of this waste, LADWP would comply with all City and state solid waste diversion, reduction, and recycling mandates, including compliance with the county-wide Integrated Waste Management Plan. Therefore, no impact would occur.

References Cited

CalRecycle. 2019a. Facility/Site Summary Details: Clean Harbors Buttonwillow LLC (15-AA-0257). Accessed April 2019. https://www2.calrecycle.ca.gov/swfacilities/Directory/15-AA-0257.

CalRecycle. 2019b. Facility/Site Summary Details: Chemical Waste Management Inc. Unit B-17 (16-AA-0027). Accessed April 2019. https://www2.calrecycle.ca.gov/swfacilities/Directory/16-AA-0027/.

County of Los Angeles. 2017. *Countywide Integrated Waste Management Plan 2017 Annual Report*. April 2019. https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=6530&hp=yes&type=PDF.

3.20 Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project would the project:	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
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?	☐	☐	☐	☒

The California Department of Forestry and Fire Services (CAL FIRE) is responsible for designating fire hazard severity zones (FHSZs) within the State Responsibility Area throughout California. FHSZs are geographical areas with an elevated risk for wildfire hazard. The State Responsibility Area is the area for which the state assumes financial responsibility for fire suppression and protection. CAL FIRE also creates recommended maps for very high FHSZs within the Local Responsibility Area, which are then adopted, or modified and adopted, by local jurisdictions. Development within a State Responsibility Area or FHSZ is required to abide by specific development and design standards. A review of CAL FIRE's State Responsibility Area maps and FHSZ maps revealed that the project site is not located within a State Responsibility Area or a very high FHSZ (CAL FIRE 2007). Further, the Los Angeles Fire Department Fire Zone Map indicates that the project site is not located within a locally designated very high FHSZ (LAFD 2019). Nonetheless, a response has been provided for the following threshold questions.

a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. The City Emergency Management Department is responsible for the planning and response to recovery from natural, human-caused, and accidental incidents (City of Los Angeles 2017). The Emergency Management Department is tasked with distributing the Emergency Operations Master Plan and Master Procedures and Annexes within the city and updates the City's emergency response and recovery plan (City of Los Angeles 2019). As such, the project would comply with the City's Emergency Operations Master Plan during project construction and demolition activities.

The project applicant would be required to design, construct, and maintain structures, roadways, and facilities to comply with applicable local, regional, state, and federal requirements related to emergency access and evacuation plans. The site plan, including the access driveways, would be reviewed and approved by the City Fire Department during construction drawing plan check review. Adherence to these requirements would ensure that potential impacts related to this issue remain below a level of significance and no mitigation is required. Additionally, under Ordinance 2017-0003 Section 198, 2017 of the Fire Code, the County mandates that emergency vehicle access, fire lanes, and existing fire apparatus access roads be maintained as per Section 503 (County of Los Angeles 2019). Therefore, the project would not impair emergency vehicle access associated with an adopted emergency response plan or emergency evacuation plan.

Furthermore, the project would be located within an industrial site, which is surrounded by industrial and commercial uses. Construction vehicles would access the site via Old San Fernando Road. No permanent or temporary street closures are planned during project activities. Emergency access to or egress from the project site or surrounding areas would not be adversely affected. As such, project activities would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; thus, no impact would occur.

b) Due to slope, prevailing winds, and other factors, would the project 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 project would involve demolition and removal of structures within the VGS property. Due to the nature of the project and the flat surrounding surface of the immediate project area, there would be no significant risk of pollutant concentration exposure from a wildfire or the uncontrollable spread of a wildfire caused by a geographic slope or prevailing winds. Although the Sun Valley community is not a located within a fire hazard zone (CAL FIRE 2007; LAFD 2019), there are surrounding areas to the north, east, west, and south that fall within fire hazard zones and could expose project occupants to pollutant concentrations should Los Angeles experience a wildfire. However, the closest fire zone location is approximately 1 mile east of the project site in the community of Stonehurst, and the area between the fire zone and the project site consists of urban development. Therefore, the likelihood of exposing project occupants to pollutant concentrations or the uncontrolled spread of a wildfire is minimal. Furthermore, the project would not result in additional occupants on the project site with the exception of construction workers during temporary construction and demolition activities. Thus, impacts associated with wildfires would be less than significant.

c) 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. The project would demolish and remove structures and systems within the VGS property. The project would involve minor repairs to the access driveway off Old San Fernando Road; however, this has been analyzed as part of the project and would not result in an increased fire risk or result in temporary or ongoing impacts to the environment. At least one prefabricated trailer would be added to the site, which would require utility hookups. However, the installation of utility hookups to the prefabricated trailer(s) is not anticipated to exacerbate fire risk or result in impacts to the environment, as the entire project site is entirely developed or disturbed, and is not located with a very high fire hazard zone. Therefore, the project would not require the installation or maintenance of associated infrastructure (e.g., roads, fuels breaks, emergency water sources, power lines, other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Impacts related to the installation of associated infrastructure would be less than significant.

d) 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 project would involve demolition and removal of structures and systems within the VGS property. Due to the nature of the project and the flat surrounding surface of the immediate project locations,

there would be no significant risk of downslope or downstream flooding as a result of runoff, post-fire slope instability, or drainage change. The water used to suppress dust during the demolition would not increase normal volume or flow. Additionally, two areas within the VGS site fall inside the Van Nuys landslide zone (CGS 1998). Both landslide zones reside within a gravel pit area that is located in the northwest corner of the VGS property. The project does not involve any demolition activities within the gravel pit area. The demolition areas are located on flat surfaces south and southeast of the gravel pit and do not fall within the landslide zone boundaries. Thus, no impact would occur.

References Cited

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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?	☐	☒	☐	☐

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 previously discussed in this MND, impacts to biological, cultural (archaeological and human remains) and Native American cultural resources would be less than significant with the incorporation of mitigation.

As discussed in Section 3.4, Biological Resources, the ornamental trees and existing structures of the decommissioned power generating units provide potential suitable nesting habitat for a variety of common bird species known to occur in the area and protected by the Migratory Bird Treaty and California Fish and Game

Code Section 3500 et seq. Additionally, a focused bat survey conducted in October 2019 by Dudek determined that two bat species, canyon bat (*Parastrellus hesperus*) and Mexican free-tailed bat (*Tadarida brasiliensis*), forage and potentially roost on the project site, specifically within and adjacent to Unit 4 and its associated smoke stack. Therefore, if project activities at this location commence during the maternity breeding season of March through August, there may be a direct impact to a bat maternity roost, which is considered a wildlife nursery site and would be considered a significant impact. Furthermore, while the project site does not contain any rivers or streams that could support native riparian habitat, the thickleaf yerba santa scrub located within the Bearing Cooling Tower Foundation proposed demolition area, is considered a S3 sensitive natural community by CDFW. If demolition of the cooling tower foundation also results in the removal of this vegetation community, this project-related impact to a sensitive natural community would be considered significant and would require compensatory habitat-based mitigation. As such, implementation of MM-BIO-1 through MM-BIO-3 would be required to reduce impacts to less than significant.

Additionally, the project could potentially eliminate important examples of the major periods of California history or prehistory. As discussed in Section 3.5, and Section 3.18, Tribal Cultural Resources, the study area has been extensively disturbed as a result of the development and maintenance of the Valley Generating Station and any surficial and/or subsurface evidence of archaeological resource deposits that may be present within the site have likely been disturbed or destroyed. Given these factors, the likelihood of affecting archaeological resources during project implementation is considered to be low. However, in the event that archaeological resources are discovered during ground-disturbing activities, management recommendations for the unanticipated discovery of archaeological resources shall be practiced as indicated in MM-CUL-1. Additionally, no prehistoric or historic burials were identified within the project area as a result of the records search. Since the site has been previously developed, ground-disturbing activities associated with demolition of the proposed units are unlikely to uncover human remains. However, in the event that human skeletal remains are uncovered during ground-disturbing activities, management recommendations shall be practiced as indicated in MM-CUL-2. Furthermore, it is possible that intact TCRs are present at subsurface depths that were not earlier impacted by the current on-site development. For this reason, the project site should be treated as potentially sensitive for TCRs. As such, MM-TCR-1 through MM-TCR-3 are recommended to reduce potential impacts to unanticipated TCRs to below a level of significance.

Based on the compliance with MM-BIO-1, MM-BIO2, MM-BIO-3, MM-CUL-1, MM-CUL-2, MM-TCR-1, MM-TCR-2, and MM-TCR-3, impacts resulting from the project, which may 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, would be less than significant.

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. As concluded throughout this MND, the project would have no impact, a less-than-significant impact, or a less-than-significant impact with mitigation incorporated with respect to all environmental impact areas outlined in the CEQA Guidelines Appendix G Environmental Checklist. For all resource areas analyzed, with the incorporation of feasible mitigation measures identified within this MND, the project's individual-level impacts would be reduced to less-than-significant levels, which would, in turn, reduce the potential for these impacts to be considered part of any possible cumulative impact. Therefore, the project would not result in individually limited but cumulatively considerable impacts.

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. As evaluated throughout this document, with incorporation of mitigation, environmental impacts associated with the project would be reduced to less-than-significant levels. Thus, the project would not directly or indirectly cause substantial adverse effects on human beings.

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