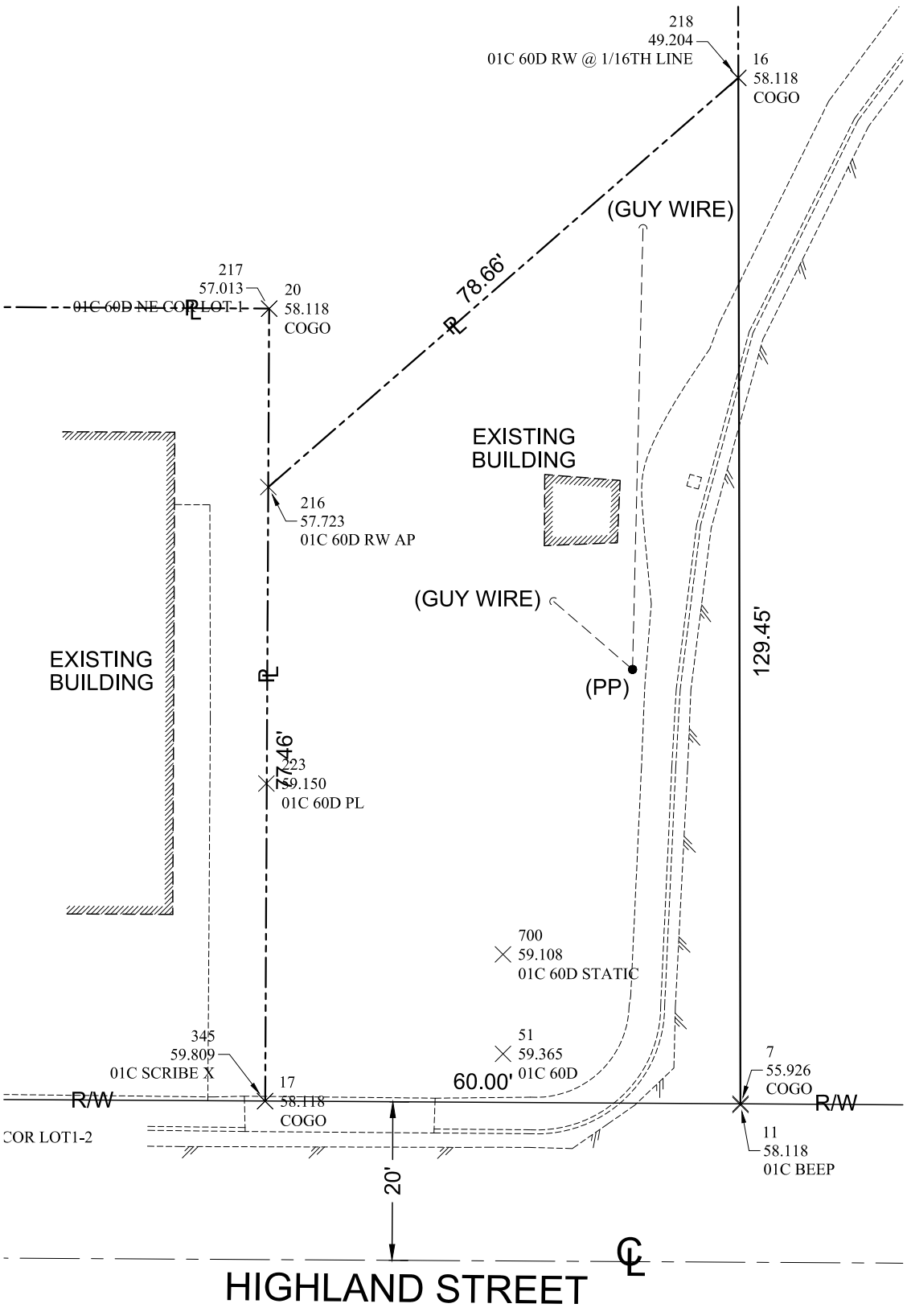
JUSTIFICATION & FINDINGS FOR NOTICE OF EXEMPTION
Replacement of L Street Pump Station

The L Street pump station is located within the City's Right of Way for L Street (see Figure 1) and adjacent to Faith Chapel Church at 1510 Highland Street (APN 0185-141-13). The existing pump station consists of a highly dilapidated 8 ft x 8 ft structure (see Photos 1 and 2) that houses a single split case pump. The pump station is set below grade which poses a safety concern for stormwater runoff. The existing pump has a 30 hp motor and is rated for 500 gpm. The L Street booster station transfers pumped groundwater from the lower Zone water system to the High zone water system and boosts pressure to the higher section of the upper zone water system on the west side of town.

The Project includes demolition of the existing pump station and construction of a new CMU block building in its place. The building will be brought up to code and will be set above grade. The old split case pump will be replaced with a newer more efficient model of the same horsepower. The deteriorating pipes in the road that connect the pump station to the distribution system will be replaced with new reliable ones. Refer to Attachment A for Project Drawings.

For purposes of the California Environmental Quality Act ("CEQA"), the Project qualifies for a Categorical Exemption under CEQA Section 15302 Replacement or Reconstruction; Class 2 consists of replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced. Replacement or reconstruction of existing utility systems and/or facilities involving negligible or no expansion of capacity are included. Findings of no impacts to environmental resources follows.



SCALE 1"=20'

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FIGURE 1 - L STREET ROW SURVEY

CEQA Findings

Air Quality

The emissions calculations for the construction phase of the pump station replacement project were modeled with using CalEEMod v. 2020.4 and results are shown in tables 1 and 2.

Table 1
Summer Construction Emissions
(Pounds Per Day)

Source/Phase	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Excavator	0.6	2.9	4.1	0.0	0.1	0.1
Dump Truck	0.7	4.6	3.7	0.0	0.2	0.2
Skidsteer	1.7	1.2	1.7	0.0	0.0	0.0
Total (lbs/day)	**2.9**	**8.7**	**9.3**	**0.0**	**0.3**	**0.3**
MDAQMD Threshold	137	137	548	137	82	82
Significant	**No**	**No**	**No**	**No**	**No**	**No**

Source: SCAQMD SCAB Fleet Average Emissions Factors (2021)

As shown in Table 1 construction emissions would not exceed Mojave Desert AQMD (MDAQMC) thresholds. Therefore, impacts would be less than significant.

The Proposed Project would not generate Fluorinated gases as defined by AB 32, only the GHGs (CO_2, CH_4, and N_2O) that are emitted by construction equipment would occur. Therefore, GHG emissions from CO_2, CH_4, and N_2O were modeled and are shown below in Table 2.

Table 2
Greenhouse Gas Construction Emissions
(Metric Tons Per Year)

Source/Phase	CO_2	CH_4	N_20
Excavator	13.4	0.0	0.0
Dump Truck	15.7	0.0	0.0
Skidsteer	3.3	0.0	0.0
Total Max (MTCO2e)	29.5		
Amortized over 30 years	**1.0**		
MDAQMD Threshold (MT)	90,718		
Significant	**No**		

Source: SCAQMD SCAB Fleet Average Emissions Factors (Diesel, 2021); N2O emissions CAPCOA Guidelines August 2010.

Model results for GHG emissions related to construction of the pump station replacement as shown in Table 2 do not exceed the MDAQMD thresholds and therefore would not result in a significant impact. No mitigation measures are required.

The operational emissions were calculated using SCAQMD On-Road Passenger Vehicles & Delivery Trucks (2021) for maintenance activities and SCAQMD SCAB Fleet Average Emissions Factors (2021) for an emergency 30hp generator for occasional use in the event of a power outage. Model results for criteria pollutants and greenhouse gas emissions are shown in Tables 3 and 4.

Table 3
Operational Emissions
(Pounds Per Day)

Source	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Maintenance Truck	0.0	0.0	0.0	0.0	0.0	0.0
Generator	0.2	1.5	1.4	0.0	0.0	0.0
Total Value (lbs/day)	**0.2**	**1.5**	**1.4**	**0.0**	**0.0**	**0.0**
MDAQMD Threshold	137	137	548	137	82	82
Significant	**No**	**No**	**No**	**No**	**No**	**No**

Source: SCAQMD On-Road Passenger Vehicles & Delivery Trucks (2021); SCAQMD SCAB Fleet Average Emissions Factors (Diesel, 2021)

Table 4
Greenhouse Gas Operational Emissions
(Metric Tons Per Year)

Source	CO_2	CH_4	N_2O
Maintenance Truck	0.5	0.0	0.0
Generator	55.7	0.0	0.0
Construction (30 Years Amortized)	1.0		
Total (MTCO2e)	**56.3**		
MDAQMD Threshold (tons)	90,718		
Significant	**No**		

Source: SCAQMD On-Road Passenger Vehicles & Delivery Trucks (2021); SCAQMD SCAB Fleet Average Emissions Factors (Diesel, 2021); N2O emissions CAPCOA Guidelines August 2010.

As shown in Table 3 and Table 4, operational emissions produced from the pump station replacement would not exceed MDAQMD thresholds and therefore would not result in a significant impact. No mitigation measures are required.

Biological Resources

The pump station rehabilitation project will provide new facilities at the same location as the exiting deteriorating station. The equipment/material staging area will be at the intersection of Highland Avenue and L Street, between the Faith Chapel Church (1510 Highland Street) and L Street. This portion of the ROW is vacant and regularly graded for use as a parking area for the church. As shown in Photos 1 and 2, there is no likelihood that any habitat exists within or adjacent to the areas of impact as they are void of vegetation. During visual inspection there were no animal burrows on-site.

Cultural Resources

The pump station rehabilitation project will provide new facilities at the same location as the exiting deteriorating station. Excavation activities will not exceed the current depth of the pumps or the pipelines and therefore no materials would be encountered that were not previously disturbed. The equipment/material staging area will be at the intersection of Highland Avenue and L Street, between the Faith Chapel Church (1510 Highland Street) and L Street; no excavations are associated with the staging area. This portion of the ROW is vacant and regularly graded for use as a parking area for the church.

Water Quality

The pump station rehabilitation project will provide new facilities at the same location as the exiting deteriorating station; the purpose of the pump station is to transfer pumped groundwater from the lower Zone water system to the High zone water system and boost pressure to the higher section of the upper zone water system on the west side of town. There will be no change over existing conditions in the source or quantity of water pumped.

There are no drainages in the vicinity of the pump station site and there would be no discharge to surface waters or groundwater associated with construction or operation of the pump station.