F.E. Weymouth Water Treatment Plant and La Verne Site Improvements Program

Initial Study

The Metropolitan Water District of Southern California
700 North Alameda Street
Los Angeles, CA 90012

Report No. ER 1660

December 2022

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1.1.1 Location of Proposed Program

The F.E. Weymouth Water Treatment Plant and La Verne Site Improvements Program (proposed Program) is located at the F.E. Weymouth Water Treatment Plant (Weymouth Plant) at 700 Moreno Avenue in La Verne, California. The Weymouth Plant is owned by The Metropolitan Water District of Southern California (Metropolitan) and includes various structures and facilities related to drinking water treatment, research, and associated infrastructure. The proposed Program includes improvements to railroad tracks outside the boundaries of the Weymouth Plant, near the southeast corner of the plant, parallel to Wheeler Avenue, and extending south to Arrow Highway. The railroad tracks outside of the Weymouth Plant are located primarily within Metropolitan fee property with the exception of five intersection street crossings and its connection with the broader Burlington Northern Santa Fe Railway Company (BNSF) railroad network. Metropolitan maintains easement rights at the crossing locations and connection with the BNSF network. Figure 1-1 shows the site of the proposed Program in a regional and local context.

1.1.2 Program Characteristics

The proposed Program consists of four improvement projects and two new construction projects, each of which is described briefly in the following subsections. The location of each project is shown in Figure 1-2.

Water Quality Laboratory Building Improvements

The Water Quality Laboratory Building Improvements project consists of retrofitting the existing 60,000-square-foot Water Quality Laboratory Building. The retrofits include seismic upgrades, functional space improvements, utility upgrades, and installation of new lab equipment. The project also includes expanding the existing building by approximately 40,000 square feet for new laboratory spaces, offices, conference rooms, and common areas. In addition, the parking, hardscaping, and landscaping associated with this building would be restored and a new employee access gate would be constructed along Sedalia Avenue near its intersection with Forestdale Street. The access gate would be available for Metropolitan staff usage during Metropolitan operational hours (6:00 a.m. to 6:00 p.m.). The new Water Quality Laboratory Building would be designed and constructed to achieve Leadership in Energy and Environmental Design (LEED) Gold certification. Construction of this project would occur from approximately 2025 to 2028 and may require nighttime and weekend work. Upon completion, the expanded Water Quality Laboratory would require approximately five to ten additional Metropolitan employees on site.

Administration and Control Buildings Seismic Upgrade and Building Improvements

The Administration and Control Buildings Seismic Upgrade and Building Improvements project consists of structurally strengthening and retrofitting the existing main lateral resisting system[1] to meet American Society of Civil Engineers Standard 41-13 (Seismic Evaluation and Retrofit of

[1] The main lateral resisting system is composed of the building's primary structural elements that transfer lateral loads, such as seismic and wind loads, to the building's foundation for bracing.

Existing Buildings), enhancing building functionality (such as reconfiguring office spaces and conference rooms), adding American with Disabilities Act (ADA)-accessible restrooms and showers, and relocating the breakroom. The project also includes architectural, mechanical, electrical, and plumbing improvements required by code. Construction of this project would occur from approximately 2024 to 2026.

Water Treatment Chemical Delivery Railroad Tracks Replacement

The Water Treatment Chemical Delivery Railroad Tracks Replacement project consists of replacing the railroad tracks and associated components (such as the railroad switches) that are used to deliver chemicals to the Weymouth Plant. The existing tracks would be removed and replacement tracks would be installed in the same footprint. The railroad tracks would comply with BNSF standards and design requirements for safe delivery of chemical railcars. Construction of this project would occur from approximately 2024 to 2025 and may require overnight closures of intersections along the alignment. Construction activities would be scheduled to avoid disruptions to existing rail service on the BNSF line and scheduled water treatment chemical deliveries to the Weymouth Plant during construction. Upon completion of this project, the quantity, frequency, and timing of water treatment chemical deliveries to the site would remain the same as under existing conditions.

Basin Nos. 1 and 2 Rehabilitation

The Basin Nos. 1 and 2 Rehabilitation project consists of replacing existing internal operational components within Basin Nos. 1 and 2. Rehabilitation may include the replacement of drop gates and gate guides, baffle walls and paddle wheel boards, and flocculator drive shaft assemblage as well as replacement of launder troughs, sludge rake mechanisms, and drive assemblage. Alternatively, Basin Nos. 1 and 2 may be converted in their entirety to match the newer basin layout and design of Basin Nos. 5 through 8. Construction of this project would occur from approximately 2027 to 2029. The Basin Nos. 1 and 2 Rehabilitation project would not expand water treatment capacity at the Weymouth Plant.

New La Verne Warehouse Facilities

The New La Verne Warehouse Facilities project involves the demolition of existing Warehouse Buildings 30 and 31 and construction of a new reinforced concrete tilt-up warehouse and a new loading dock. The new warehouse building and loading dock would be up to 60,000 square feet in size with approximately 30,000 additional square feet of outdoor canopy storage space. The new warehouse building would include conference rooms and offices, ADA-accessible restrooms, and a breakroom. The outdoor canopy storage space would be utilized for valves, pipes, materials, supplies, and equipment related to Metropolitan operations. The project would also include upgrading Central Stores Annex Building 32A and General Store Building 33. The proposed upgrades would include new building foundations, insulation, rooftops, and walls. Additionally, the inactive southern rail line spur within the Weymouth Plant would be removed. Construction of this project would occur from approximately 2025 to 2026. Upon completion, the New La Verne Warehouse Facilities would not require additional Metropolitan employees on site or additional equipment/materials delivery trips.

New Field Engineering Building

The New Field Engineering Building project consists of the construction of a new field engineering building within the Weymouth Plant. The existing engineering building may be repurposed for storage or other non-occupancy use. The new engineering building would be approximately 35,000 square feet and would include conference rooms and offices, lunchroom, ADA-accessible restrooms, and testing laboratories (e.g., soils, concrete, coatings). The new engineering building would be designed and constructed to achieve LEED Silver certification. Construction of this project would occur from approximately 2027 to 2029. Upon completion, the new field engineering building would not require additional Metropolitan employees on site.

1.2 Program Baseline and Existing Conditions

The Program baseline is existing (2022) conditions at the Weymouth Plant. As described in Section 1.1.1, *Location of Proposed Program*, and shown on Figure 1-2, the site of the proposed Program is currently developed with a variety of structures and facilities related to drinking water treatment, research, and associated infrastructure.

1.3 Other Agency Approvals Which May Be Required

Table 1-1 lists the anticipated permits and approvals which may be required for Program-related activities.

Table 1-1 Permits and Approvals Which May Be Required

Agency/Department	Permit/Approval	Description
Federal		
United States Environmental Protection Agency (USEPA)	Permit for polychlorinated biphenyls (PCB) Removal	Permit for removal and disposal of components of Basin Nos. 1 and 2 that may contain PCBs and sealants.
State of California		
State Water Resources Control Board (SWRCB) Division of Drinking Water (DDW)	Evaluate Existing DDW Permit	Evaluation of existing DDW permit for proposed improvements for the Basin Nos. 1 and 2.
California Department of Transportation (Caltrans), District 7	Haul Permit	Haul permit for heavy construction equipment and/or materials which require the use of oversized-transport vehicles on State highways.
California Public Utilities Commission (CPUC)	Encroachment Permit/Other Approval	An encroachment permit or other approval for modification of the existing rail spur.
Regional		
Burlington Northern and Santa Fe Railway Company (BNSF)	Encroachment Permit/Other Approval	An encroachment permit or other approval for modification of the existing rail spur.
Los Angeles County Parks and Recreation	Encroachment Permit/Other Approval	An encroachment permit or other approval for work along the Water Treatment Chemical Delivery Railroad Tracks due to their proximity to the Marshall Canyon Trail.
Regional Water Quality Control Board (RWQCB)	National Pollutant Discharge Elimination System Construction General Permit	General construction activities to obtain coverage under the Construction General Permit and prepare a Storm Water Pollution Prevention Plan.

Table 1-1 Permits and Approvals Which May Be Required

Agency/Department	Permit/Approval	Description
Local		
City of La Verne	Fire Department Review	New structures would be subject to review of fire sprinkler and alarm systems pursuant to Ordinance 869.
	Building and Grading Permits[1]	Building and grading permits for Program elements not directly related to the treatment, storage, or transmission of drinking water.
	Noise and Construction Variances	Noise and construction variances for 24-hour workday or nighttime construction.

[1] California Government Code Section 53091 exempts Metropolitan, as a regional public water purveyor and utility, from local zoning ordinances and local building codes. At the Weymouth Plant, this exemption has been interpreted to pertain to activities at the plant site directly related to the treatment, storage, or transmission of drinking water.

Figure 1-1 Program Site Vicinity

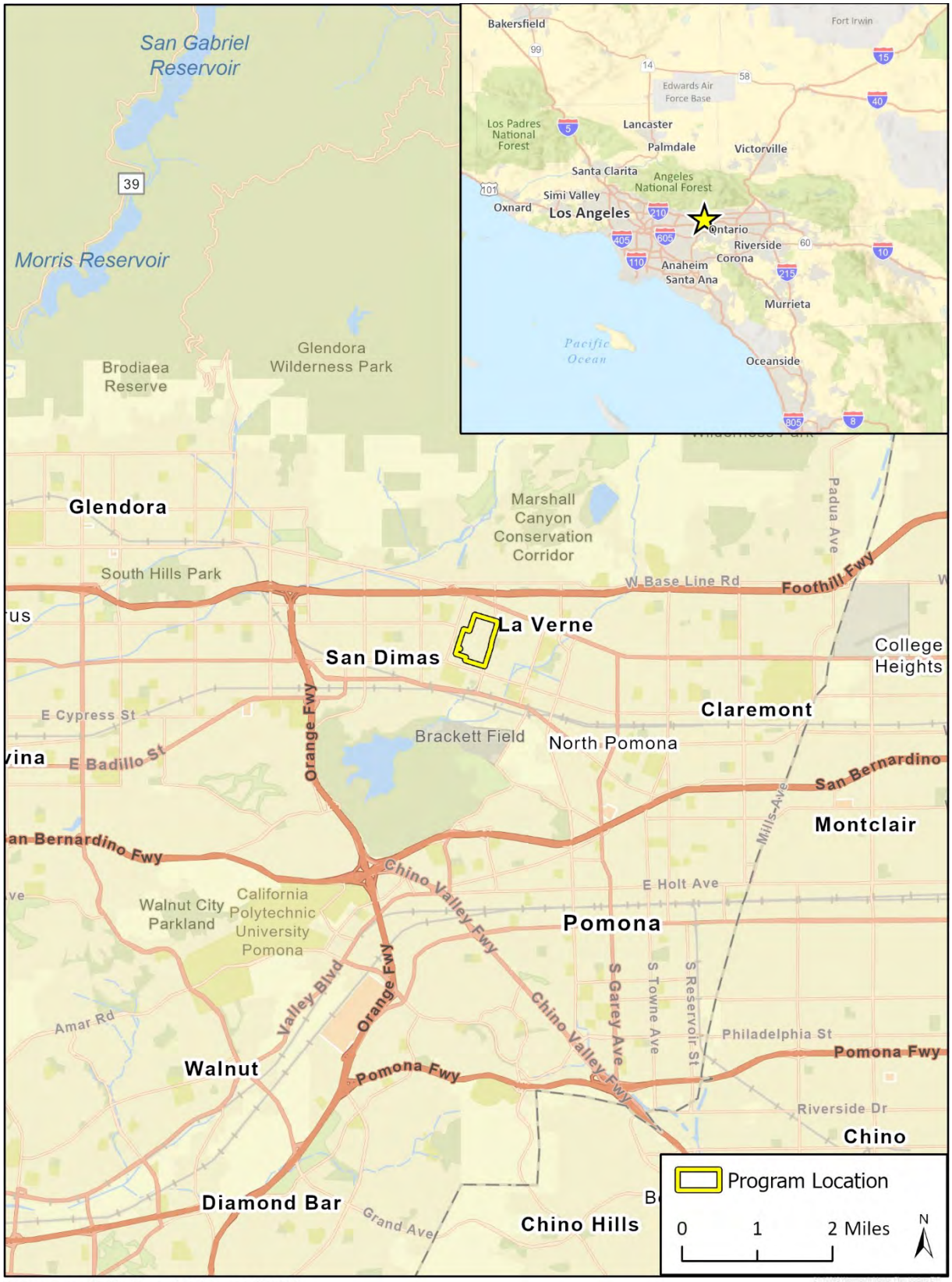

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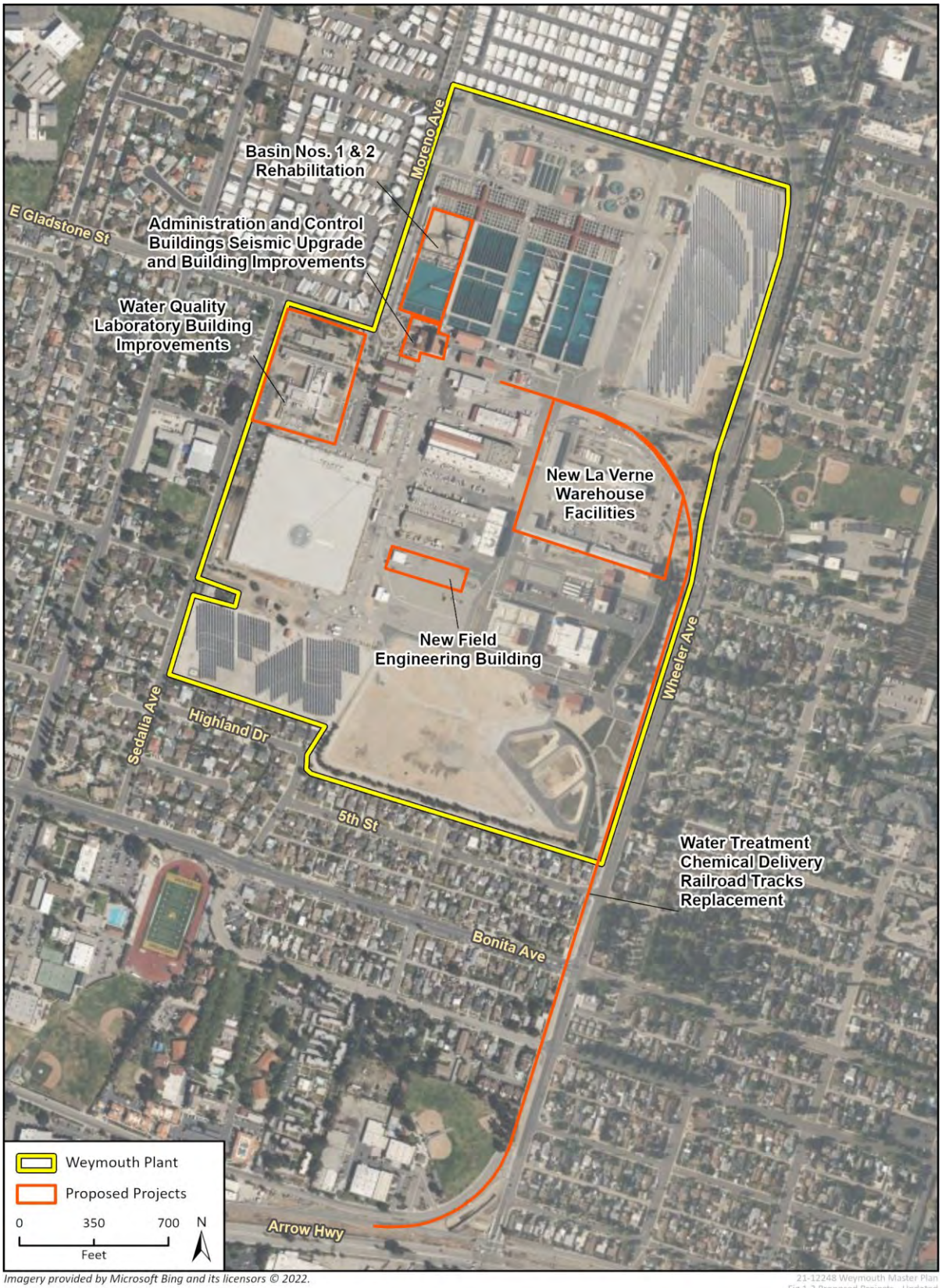
Figure 1-2 Proposed Facilities



2. Initial Study

This document is an Initial Study, which addresses the potential environmental effects resulting from the proposed Program and identifies the environmental effects warranting further study in an Environmental Impact Report (EIR).

2.1 Legal Authority and Findings

This Initial Study was prepared in accordance with the California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et seq., and the CEQA Guidelines, California Code of Regulations Section 15000 et seq.

Initial Study. Section 15063 of the CEQA Guidelines describes an Initial Study as a preliminary review to determine if the project may have a significant effect on the environment. If the Lead Agency determines that an EIR will clearly be required for the project, an Initial Study is not required but may still be desirable. As outlined in CEQA Guidelines Section 15063(c), the purposes of an Initial Study include:

(1) Providing the Lead Agency with the necessary information to decide whether to prepare an EIR or a Negative Declaration;

(2) Enabling the Lead Agency to modify a project during the planning stage by mitigating adverse impacts prior to preparation of CEQA documentation, thus avoiding the need to prepare an EIR; and

(3) Assisting in the preparation of an EIR, if one is required, by:

(A) Focusing the EIR on the effects determined to be significant,

(B) Identifying the effects determined not to be significant,

(C) Explaining the reasons for determining that potentially significant effects would not be significant, and

(D) Identifying whether a program EIR, tiering, or another appropriate process can be used for analysis of the project's environmental effects.

Determining the Significance of the Environmental Effects Caused by a Project. Section 15064 of the CEQA Guidelines provides guidance for when an EIR is prepared:

(1) If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, the agency shall prepare a draft EIR (CEQA Guidelines Section 15064[a][1]).

(2) The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data (CEQA Guidelines Section 15064[b][1]).

(3) If the lead agency determines there is substantial evidence in the record that the project may have a significant effect on the environment, the lead agency shall prepare an EIR. Said another way, if a lead agency is presented with a fair argument that a project may have a significant effect on the environment, the lead agency shall prepare an EIR even

though it may also be presented with other substantial evidence that the project will not have a significant effect (CEQA Guidelines Section 15064[f][1]).

(4) After application of the principles set forth above in Section 15064(f)(g), and in marginal cases where it is not clear whether there is substantial evidence that a project may have a significant effect on the environment, the lead agency shall be guided by the following principle: If there is disagreement among expert opinion supported by facts over the significance of an effect on the environment, the Lead Agency shall treat the effect as significant and shall prepare an EIR (CEQA Guidelines Section 15064[g]).

(5) When assessing whether a cumulative effect requires an EIR, the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable. An EIR must be prepared if the cumulative impact may be significant and the project's incremental effect, though individually limited, is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects (CEQA Guidelines Section 15064[h][1]).

(6) A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program (including, but not limited to, water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, plans or regulations for the reduction of greenhouse gas [GHG] emissions) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. When relying on a plan, regulation or program, the lead agency should explain how implementing the particular requirements in the plan, regulation or program ensure that the project's incremental contribution to the cumulative effect is not cumulatively considerable. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding that the project complies with the specified plan or mitigation program addressing the cumulative problem, an EIR must be prepared for the project (CEQA Guidelines Section 15064[h][3]).

Decision to Prepare an EIR. Section 15081 of the CEQA Guidelines states the decision to prepare an EIR is made either during preliminary review conducted pursuant to Section 15060 of the CEQA Guidelines or at the conclusion of an Initial Study after applying the standards described in Section 15064 of the CEQA Guidelines.

2.2 Impact Analysis and Significance Classification

The following sections of this Initial Study discuss the possible environmental effects of the proposed Program for specific issue areas as identified on the CEQA Environmental Checklist

Form in Appendix G of the CEQA Guidelines (as updated in December 2018). For each issue area, potential effects are analyzed.

A "significant effect on the environment" is defined by Section 15382 of the CEQA Guidelines as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by a project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment" but "may be considered in determining whether the physical change is significant."

For environmental effects determined to be potentially significant, an EIR will be prepared to fully evaluate the level of significance of these impacts and identify mitigation measures to reduce Program impacts, if needed.

2.3 Initial Study and Environmental Checklist Form

a)	Program Title:	F.E. Weymouth Water Treatment Plant and La Verne Site Improvements Program (proposed Program; Program)
b)	Lead Agency Name and Address:	The Metropolitan Water District of Southern California 700 North Alameda Street Los Angeles, CA 90012
c)	Contact Person:	Brenda Marines Environmental Planning Section The Metropolitan Water District of Southern California Phone: (213) 217-7902 Email: bmarines@mwdh2o.com
d)	Program Location:	The proposed Program is located at the Weymouth Plant at 700 Moreno Avenue in La Verne, California. The proposed Program also includes railroad tracks located outside of the southeast corner of the Weymouth Plant, extending parallel to Wheeler Avenue and south to Arrow Highway. Figure 1-1 in Section 1 (Program Description) shows the site of the proposed Program in a regional and local context, and Figure 1-2 in Section 1 (Program Description) shows the location of each project included in the proposed Program.
e)	Program Sponsor's Name and Address:	The Metropolitan Water District of Southern California 700 North Alameda Street Los Angeles, CA 90012

f)	General Plan Designation:	Community Facility/Freeway (CF), Low Density Residential (LDR), Medium Density Residential (MDR)
g)	Zoning:	Official (O), Planned Residential 4.5 Dwelling Units/Acre Detached (PR4.5D), and Planned Residential 10 Dwelling Units/Acre Attached (PR10A)
h)	Description of Program:	Refer to Section 1 (Program Description).
i)	Surrounding Land Uses and Setting:	Generally surrounded by residential neighborhoods to the west, north, south, and east; Grace Miller Elementary School and Pelota Park to the east; Calvary Baptist School and Wheeler Avenue Park to the west; and Recreation Parks to the south.
j)	Other Agencies Whose Approval May be Required:	▪ USEPA ▪ SWRCB DDW ▪ Caltrans, District 7 ▪ CPUC ▪ BNSF ▪ Los Angeles County Parks and Recreation ▪ RWQCB ▪ City of La Verne
k)	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, has consultation begun?	Four California Native American tribes traditionally and culturally affiliated with the Project area have requested notification pursuant to Public Resources Code Section 21080.3.1. Notification letters will be mailed on December 6, 2022. Additional letters to 15 tribal contacts provided by the Native American Heritage Commission will also be mailed out simultaneously. Consultation has not yet begun, but if consultation is requested, the results will be summarized in the Draft EIR.

2.4 Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this Program and will be evaluated further in an EIR as indicated by the checklist boxes on the following pages that are marked "Potentially Significant."

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

2.5 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 EIR pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.

Jennifer Harriger 12-01-2022

Jennifer Harriger Date

Manager, Environmental Planning Section

3. Evaluation of Environmental Impacts

The following discussion addresses impacts to various environmental resources, per the Environmental Checklist Form contained in Appendix G of the State California Environmental Quality Act (CEQA) Guidelines.

3.1 Aesthetics

AESTHETICS Except as provided in Public Resources Code Section 21099, would the Program:		Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
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 Program is in an urbanized area, would the Program 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?	☐	☐	☒	☐

Significance criteria established by CEQA Guidelines, Appendix G.

Discussion. Would the Program:

a. Have a substantial adverse effect on a scenic vista?

Less than Significant. The proposed Program would not have a substantial adverse effect on a scenic vista. A scenic vista is defined as a viewpoint that provides panoramic or focused views of a highly valued landscape or scenic resource for the benefit of the general public. The La Verne General Plan states several streets in the northern part of the city have significant scenic vistas and identifies 18 scenic view corridors located throughout the city. In the vicinity of the Program site, the view along Gladstone Street looking eastbound from its intersection with Damien Avenue towards the Weymouth Plant and the view along Bonita Avenue looking eastbound from its intersection with Wheeler Avenue are identified as scenic view corridors by the La Verne General Plan (City of La Verne 1998). The Weymouth Plant is within the viewshed of the scenic view corridor along Gladstone Street and is therefore part of a scenic vista. Views from the Gladstone Street scenic view corridor toward the Weymouth Plant may be temporarily altered and/or obstructed by the presence of construction equipment and scaffolding during construction activities associated with the Administration and Control Buildings Seismic Upgrade and Building Improvements project. However, the equipment and scaffolding would be removed at the end of project construction, and minimal permanent changes to the visual appearance of the Weymouth Plant within the viewshed of this scenic corridor would occur. Views along Bonita Avenue eastbound from Wheeler Avenue would not be impacted by the proposed Program because construction activities for the Water Treatment Chemical Delivery Railroad Tracks Replacement project at and near the intersection of Wheeler Avenue and Bonita Avenue would occur on the western side of this intersection outside the viewshed of this scenic corridor. Thus, the proposed

Program would not result in substantial adverse effects on a scenic vista, and impacts would be less than significant. Further analysis in the Draft EIR is not warranted.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

No Impact. The proposed Program would not substantially damage scenic resources within a State scenic highway. The nearest highways to the Program site are State Route 66, located approximately 0.2 mile to the north; Interstate 210, located approximately 0.6 mile to the north; and State Route 57, located approximately 2.3 miles to the west. None of these highways is a designated State scenic highway (California Department of Transportation 2019). Therefore, no impact to scenic resources within a State scenic highway would occur, and further analysis in the Draft EIR is not warranted

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 Program is in an urbanized area, would the Program conflict with applicable zoning and other regulations governing scenic quality?

No Impact. The proposed Program, which is located in an urbanized area, would not conflict with applicable zoning and other regulations governing scenic quality. The proposed Program consists of four improvement projects and two new construction projects at the existing Weymouth Plant and off-site along the existing water treatment chemical delivery railroad tracks alignment. The Basin Nos. 1 and 2 Rehabilitation project is exempt from local building and zoning regulations pursuant to California Government Code Section 53091(d) and (e). Therefore, the following analysis focuses on potential impacts associated with the Water Quality Laboratory Building Improvements, the Administration and Control Buildings Seismic Upgrade and Building Improvements, the Water Treatment Chemical Delivery Railroad Tracks Replacement, the new La Verne Warehouse Facilities, and the new Field Engineering Building projects.

The Weymouth Plant is zoned as Official (City of La Verne 2016). Section 18.56.010 of the La Verne Municipal Code states the Official zoning district is for "official and public uses of property, including public schools, public buildings, public parks and recreational areas, water works and drainage facilities, and areas which, for the welfare of the city." The Weymouth Plant would continue to be zoned Official and would remain in its current use as a water treatment plant. The new La Verne Warehouse facilities and the new Field Engineering Building would be consistent with the setback and height requirements contained in La Verne Municipal Code Sections 18.56.050 and 18.56.060. In addition, Program components visible from public vantage points along the western portion of the plant, such as the Water Quality Laboratory Building, would look substantially similar to existing conditions upon completion of Program activities. Furthermore, the new Field Engineering Building and the new La Verne Warehouse facilities would be consistent with the existing developed nature of the Weymouth Plant and would be largely screened from view by existing vegetation and walls located along the southern and eastern portions of the Weymouth Plant. Therefore, no conflicts with local zoning and other regulations governing scenic quality would occur at the Weymouth Plant. A portion of the Water Treatment Chemical Delivery Railroad Tracks Replacement project would be located outside the Weymouth Plant and would traverse parcels zoned as PR4.5D and PR10A. The water treatment chemical delivery railroad tracks are an existing feature that would be replaced along their current alignment

and therefore would not change the visual character or quality along the alignment. Overall, no impacts related to conflicts with applicable zoning and other regulations governing scenic quality would occur, and further analysis in the Draft EIR is not warranted.

d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less than Significant. The proposed Program would not create new sources of substantial light or glare that would adversely affect day or nighttime views in the area. Program construction activities may require temporary nighttime lighting within the Weymouth Plant during the Water Quality Laboratory Building Improvements and along the off-site portion of the railroad tracks alignment during the Water Treatment Chemical Delivery Railroad Tracks Replacement project. However, in accordance with Metropolitan standard practices, the Program Contractor(s) would be required to exercise special care to direct floodlights to shine downward and to shield them to avoid a nuisance to the surrounding areas, with no lighting including a residence in its direct beam. Lighting would also be installed at the new employee access gate along Sedalia Avenue, which would represent a new source of light. This lighting would be similar to other lighting used throughout the Weymouth Plant and would either be controlled via motion sensor or would be limited in operational hours from dusk to dawn. The lighting would be shielded and directed downwards to avoid casting glare and light onto Sedalia Avenue and nearby residences. Lighting would also be required to comply with the parking lot lighting standards in La Verne Municipal Code Section 18.76.090, which would further limit the potential for light spillover to adjacent properties. As a result, the proposed lighting at the new Sedalia Avenue access gate would not represent a new source of substantial light that would adversely affect day or nighttime views. Additionally, the proposed Program does not include components with the potential to generate glare. Therefore, impacts would be less than significant, and further analysis in the Draft EIR is not warranted.

3.2 Agricultural Resources

AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, Lead Agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, Lead Agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the Program:

		Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Significance criteria established by CEQA Guidelines, Appendix G.

Discussion. Would the Program:

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?

No Impact. The proposed Program would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use; conflict with existing zoning for agricultural use or a Williamson Act contract; conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned as Timberland Production; result in the loss of forest land or conversion of forest land to non-forest use; or involve other changes in the existing environment which, due to their location or nature, could result in the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.

The Program site has been in use as a water treatment plant since 1941 (Metropolitan 2016). The Program site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide (California Department of Conservation [DOC] 2016). The Program site is not zoned for agricultural use or under a Williamson Act contract, and no farmland exists within or adjacent to the Program site (City of La Verne 2016; DOC 2017). The Program site is also not zoned for forest land or timberland, and no forest land exists within or adjacent to the Program site (City of La Verne 2016). Thus, no impacts to agriculture and forestry would occur as a result of the proposed Program, and further analysis in the Draft EIR is not warranted.

3.3 Air Quality

AIR QUALITY Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the Program:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the Program 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?	☐	☐	☒	☐

Significance criteria established by CEQA Guidelines, Appendix G.

Discussion. Would the Program:

a. Conflict with or obstruct implementation of the applicable air quality plan?

Potentially Significant. The proposed Program may conflict with or obstruct implementation of the applicable air quality plan. The proposed Program is located in the South Coast Air Basin, which is regulated by the South Coast Air Quality Management District (SCAQMD). The SCAQMD has adopted its 2016 Air Quality Management Plan (AQMP) to provide a strategy for the attainment of State and federal air quality standards. To be consistent with the AQMP, a project must 1) be consistent with the growth assumptions underlying the AQMP and 2) not 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 air quality standards (SCAQMD 1993). With regard to criterion #1, the proposed Program does not include the construction of new water supply facilities or the expansion of treatment capacity and therefore would not increase water supply to the region or otherwise indirectly induce population growth. The expanded Water Quality Laboratory Building would accommodate approximately five to ten additional Metropolitan employees, but these employees likely already live in Southern California and would not result in new growth in the SCAQMD region. Therefore, the proposed Program would be consistent with the growth assumptions underlying the 2016 AQMP because it would not induce additional growth. However, as discussed further under threshold (b), the proposed Program may result in a significant increase in air pollutant emissions during construction and operational activities, which would have the potential to increase the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of air quality standards. Therefore, impacts may be potentially significant, and an air quality technical study will be prepared to further analyze this topic. The Program's impacts will be detailed further in the Draft EIR, and feasible mitigation measures, as required, will be proposed.

b. Result in a cumulatively considerable net increase of any criteria pollutant for which the Program region is non-attainment under an applicable Federal or State ambient air quality standard?

Potentially Significant. The proposed Program may result in a cumulatively considerable net increase of criteria pollutants for which the Program region is designated non-attainment under applicable federal and State ambient air quality standards. During construction activities, emissions would result from the operation of construction vehicles and equipment, haul trips for demolished materials, and transport of workers and materials to and from the Program site. In addition, operational emissions may increase upon completion of construction activities due to a minor increase in employees at the expanded Water Quality Laboratory Building. Therefore, impacts may be potentially significant, and an air quality technical study will be prepared to further analyze this topic. The Program's impacts will be detailed further in the Draft EIR, and feasible mitigation measures, as required, will be proposed.

c. Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant. The proposed Program may expose sensitive receptors to substantial pollutant concentrations. Several sensitive receptors, including residences and schools, are located in the local vicinity of the Program site. During construction activities, localized air pollutant emissions would be generated primarily by the on-site operation of construction vehicles and equipment and the use of local roadways for haul trips for demolished materials and transport of workers and materials to and from the Program site. In addition, localized operational air pollutant emissions may increase upon completion of construction activities due to a minor increase in employees at the expanded Water Quality Laboratory Building. Therefore, impacts may be potentially significant, and an air quality technical study will be prepared to further analyze this topic. The Program's impacts will be detailed further in the Draft EIR, and feasible mitigation measures, as required, will be proposed.

d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less than Significant. The proposed Program would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. During construction activities, temporary odors would be generated by vehicle exhaust and construction equipment. Construction-related odors would be short-term and would cease upon completion. Therefore, Program construction would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people, and impacts would be less than significant. The Program does not include any components with the potential to generate other emissions, such as those leading to odors, during operation. Therefore, Program operation would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people, and impacts would be less than significant. Thus, further analysis in the Draft EIR is not warranted.

3.4 Biological Resources

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

Significance criteria established by CEQA Guidelines, Appendix G.

OVERVIEW OF BIOLOGICAL RESOURCES

Bargas Environmental Consulting prepared a Biological Resources Assessment report to document existing conditions and to evaluate the potential for impacts to biological resources during implementation of the proposed Program. Regulated or sensitive resources studied and analyzed herein include special status plant and wildlife species, nesting birds and raptors, sensitive plant communities, jurisdictional waters and wetlands, wildlife movement, and locally protected resources, such as protected trees. The Biological Resources Assessment is attached as Appendix A.

REGULATORY FRAMEWORK

The following is a summary of the regulatory context under which biological resources are managed at the federal, State, and local levels. Many federal and State statutes provide a regulatory structure that guides the protection of biological resources. Agencies with the responsibility for protection of biological resources within the regional vicinity of the Program site include:

- United States Army Corps of Engineers (wetlands and other waters of the United States);
- Regional Water Quality Control Board (RWQCB) (waters of the State);
- United States Fish and Wildlife Service (USFWS) (federally listed species and migratory birds); and

- California Department of Fish and Wildlife (CDFW) (riparian areas and other waters of the State, State-listed species).

Special status habitats are vegetation types, associations, or sub-associations that support concentrations of special status plant or wildlife species, are of relatively limited distribution, or are of particular value to wildlife.

Listed species are those taxa that are formally listed as endangered or threatened by the federal government (e.g., USFWS), pursuant to the Federal Endangered Species Act or as endangered, threatened, or rare (for plants only) by the State of California (i.e., CDFW), pursuant to the California Endangered Species Act or the California Native Plant Protection Act. Some species are considered rare (but not formally listed) by resource agencies, organizations with biological interests/expertise (e.g., Audubon Society, California Native Plant Society, The Wildlife Society), and the scientific community.

METHODOLOGY

Biological conditions were evaluated by confirming applicable regulations, policies, and standards; reviewing biological literature and querying available databases pertinent to the Program site and vicinity (within five miles); and conducting a reconnaissance-level biological survey of the Program site and 250-foot survey buffer ("Biological Study Area") on July 11, 2022. Prior to conducting the biological field survey for the proposed Program, a variety of literature was reviewed to obtain baseline information about the biological resources with potential to occur within the Program site and surrounding area, including databases from CDFW, USFWS, and California Native Plant Society. Refer to Appendix A for the full list of literature reviewed and a detailed description of the field survey methodology.

EXISTING CONDITIONS

The Program site is fully developed, containing infrastructure utilized for water treatment and associated access roads, parking lots, and ornamental landscaping. The lands adjacent to the Program site are fully developed and include urban residential and commercial land uses. The Program site lacks wetlands or waters that fit the required criteria to be defined as wetlands or waters of the U.S. or State. A concrete channelized drainage (Marshall Creek) is present within the Biological Study Area on the east side of Wheeler Avenue across from the Program site. Marshall Creek is generally a below-ground channel located directly beneath Wheeler Avenue near the Weymouth Plant vicinity. The channel daylights to an open concrete channel (Marshall Canyon Channel) near Arrow Highway and the BNSF railroad tracks. No natural or sensitive vegetation communities are present within the Biological Study Area, and no special status plants or wildlife were observed during the field survey. There are no natural wildlife movement corridors present within the Biological Study Area (Appendix A).

The desktop review determined 30 plant species and 22 wildlife species with special status have been documented as occurring within five miles of the Program site. No special status plant species have the potential to occur in the Biological Study Area. Two special status wildlife species have a low potential for occurrence in the Biological Study Area – pallid bat (*Antrozous pallidus*) and western yellow bat (*Lasiurus xanthinus*) (Appendix A). These species and an analysis of potential Program impacts are discussed in further detail below.

Discussion. Would the Program:

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?*

Less than Significant. The proposed Program would not 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 CDFW or USFWS.

Special Status Plants

No special status plant species have the potential to occur within the Biological Study Area. Therefore, no impacts to special status plants would occur under the proposed Program.

Special Status Wildlife

Two special status wildlife species have a low potential for occurrence in the Biological Study Area – pallid bat and western yellow bat.

Pallid Bat

Pallid bat is a California Species of Special Concern. The Program site is within the distribution range for the species and contains several buildings and warehouses that could provide suitable day-roosting habitat, depending upon the presence of openings for ingress/egress for bats to access appropriate roosting spaces. This species has been known to acclimate to various types of anthropogenic disturbance and roost in structures occupied or otherwise utilized by humans. However, the Program site and surrounding area are developed and experience high levels of ambient disturbance from industrial-type activities, which reduces the potential for this species to occur (Appendix A). Therefore, because this species has a low potential to occur at the Program site, the Program would not have a substantial adverse effect to the regional population of this species and impacts to pallid bat would be less than significant.

Western Yellow Bat

Western yellow bat is a California Species of Special Concern. The Program site is within the distribution range for this species and contains palm trees and other trees that could support roosting western yellow bats. This species has been observed increasingly using ornamental palms in landscaping as habitat. However, ongoing human disturbance at the Program site reduces the potential for occurrence of this species. In addition, the palm trees observed appear to be managed and, at the time the biological survey was conducted, did not contain skirts of dead palm fronds, which are the preferred roosting habitat of this species (Appendix A). Therefore, because this species has a low potential to occur at the Program site, the Program would not have a substantial adverse effect to the regional population of this species, and impacts to western yellow bat would be less than significant.

Summary

As described above, the proposed Program would not 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 CDFW or USFWS. Impacts would be less than significant, and further analysis in the Draft EIR is not warranted.

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?

No Impact. The proposed Program would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by CDFW or USFWS. The Program site does not contain riparian habitat or other sensitive natural communities; therefore, no sensitive natural communities would be impacted by Program implementation (Appendix A). No impact would occur, and further analysis in the Draft EIR is not warranted.

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?

Less than Significant. The proposed Program would not 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. The Program site does not contain State or federally protected wetlands; therefore, no State or federally protected wetlands would be directly impacted by Program implementation (Appendix A). A concrete channelized drainage (known as Marshall Canyon Channel) managed by the Los Angeles County Flood Control District is present adjacent to the southern end of the water treatment chemical delivery railroad tracks that are proposed for replacement (Appendix A). The Program would not directly impact this channel because work would occur outside of the fence line that surrounds the channel. However, as discussed further in Section 3.10, (Hydrology and Water Quality), grading, excavation, and other activities associated with construction of the proposed Program could result in soil disturbance in some areas, which could indirectly impact the channel if a rain event occurs during construction activities that mobilizes nearby stockpiled spoils or other materials into the channel and adversely impacts water quality. Program construction would also involve the use and handling of chemicals such as concrete, cement, oil, fuels, and lubricants that could be accidentally released during spill events and adversely impact nearby water bodies if released materials come into contact with stormwater runoff. However, in accordance with Metropolitan standard practice, hazardous materials would be stored away from storm drains in covered, leak-proof containers when not in use and would be protected from rainfall infiltration and ground permeation in the event of an accidental spill. Construction materials also would not be placed in areas where they could be washed into a drainage course or channel during the rainy season, pursuant to Metropolitan standard practice. Furthermore, as detailed in Section 3.7 (Geology and Soils), each project within the proposed Program would either be subject to the requirements of the National Pollutant Discharge Elimination System (NPDES) Construction General Permit or Metropolitan's standard requirements for preparation of a Water Quality Control Plan, which would prevent water quality impacts associated with stormwater runoff. The nature of operations and maintenance activities at the Weymouth Plant would be similar to existing conditions once construction activities are completed and would not result in any new sources of sedimentation or other pollutants that could affect State or federally protected wetlands. Therefore, the proposed Program would not have a substantial adverse effect on State or federally protected wetlands through direct

removal, filling, hydrological interruption, or other means. Impacts would be less than significant, and further analysis in the Draft EIR is not warranted.

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?

No Impact. The proposed Program would not 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 The Program site does not contain wildlife movement corridors or nursery sites (Appendix A). Therefore, no impact would occur, and further analysis in the Draft EIR is not warranted.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less than Significant. The proposed Program would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. The only Program component potentially requiring removal of trees protected by the City of La Verne Tree Ordinance (La Verne Municipal Code Chapter 18.78, Preservation, Protection, and Removal of Trees) is the Water Quality Control Laboratory Building Improvements project. However, in accordance with Metropolitan standard practice, Metropolitan would coordinate with the City of La Verne during the removal of trees protected under the tree ordinance. The Water Treatment Chemical Delivery Railroad Tracks and New La Verne Warehouse Facilities projects are in proximity to trees protected by the City's tree ordinance; however, these projects are not expected to require alterations to or removal of these trees. None of the other Program components would require alterations or removal of trees protected by the City's tree ordinance. Therefore, the proposed Program would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Impacts would be less than significant, and further analysis in the Draft EIR is not warranted.

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?

No Impact. The proposed Program would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. The Program site is not within the boundaries of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. No impact would occur, and further analysis in the Draft EIR is not warranted.

3.5 Cultural Resources

CULTURAL RESOURCES Would the Program:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource 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?	☐	☐	☒	☐

Significance criteria established by CEQA Guidelines, Appendix G.

Discussion. Would the Program:

a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Potentially Significant. The proposed Program would potentially cause a substantial adverse change in the significance of a historical resource pursuant to *State CEQA Guidelines* Section 15064.5. The proposed Program would result in alterations to the Administration and Control Buildings, Basin Nos. 1 and 2, and the water treatment chemical delivery railroad tracks, which are contributing features of the Weymouth Water Treatment Plant Historic District (Historic District). The Historic District is eligible for listing in the National Register of Historical Places and the California Register of Historic Resources and is therefore considered a historical resource under CEQA along with its contributing features (Metropolitan 2016). In addition, the proposed Program would result in alterations to the Field Engineering Building, Warehouse Building 30 (the Central Stores Warehouse), and Warehouse Building 31 (the Covered Storage Building), all of which are more than 45 years of age. Although these buildings were previously found to be non-contributors to the Historic District, their individual historical resources eligibility has yet to be established (Metropolitan 2016). Therefore, the proposed Program has the potential to result in adverse change to the significance of historical resources. As a result, impacts to historic resources may be potentially significant, and a Cultural Resources Technical Report will be prepared to further analyze this topic. The Program's historic resources impacts will be detailed further in the Draft EIR, and feasible mitigation measures, as required, will be proposed.

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Potentially Significant. The proposed Program would potentially cause a substantial adverse change in the significance of an archaeological resource pursuant to *State CEQA Guidelines* Section 15064.5. The Weymouth Plant has experienced a high level of disturbance in conjunction with development of on-site facilities, and no archaeological resources or archaeological deposits have been previously identified within the Program site (Metropolitan 2005, 2015, and 2016). However, the lack of surface evidence of archaeological materials does not preclude their subsurface existence, and the proposed Program would require excavation activities into previously undisturbed, native soils associated with the Administration and Control Buildings Seismic Upgrade and Building Improvement project that may encounter intact subsurface archaeological resources. As a result, impacts to archaeological resources may be potentially

significant, and a Cultural Resources Technical Report will be prepared to further analyze this topic. The Program's archaeological resources impacts will be detailed further in the Draft EIR, and feasible mitigation measures, as required, will be proposed.

c. Disturb any human remains, including those interred outside of formal cemeteries?

Less than Significant. The proposed Program would not disturb any human remains, including those interred outside of formal cemeteries. No human remains are known to be present within the Program site, and the Program site is highly disturbed. Although it is highly unlikely, there is the possibility that previously undiscovered remains could be uncovered during ground-disturbing activities. Should human remains be encountered, Metropolitan would comply with the State of California's Health and Safety Code Section 7050.5, which states no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. If the human remains are determined to be of Native American origin, the Coroner will notify the Native American Heritage Commission, which will determine and notify a Most Likely Descendant. The Most Likely Descendant has 48 hours from being granted site access to make recommendations for the disposition of the remains. If the Most Likely Descendant does not make recommendations within 48 hours, Metropolitan would reinter the remains in an area of the property secure from subsequent disturbance. With adherence to existing regulations, impacts to human remains would be less than significant, and further analysis in the Draft EIR is not warranted.

3.6 Energy

Energy Would the Program:	Potentially Significant Impact	Less than Significant 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 Program construction or operation?	☐	☐	☐	☒
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

Significance criteria established by CEQA Guidelines, Appendix G.

Discussion. Would the Program:

a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Program construction or operation?

No Impact. The proposed Program would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources.

Energy use during the construction phase of the proposed Program would be in the form of fuel consumption (e.g., gasoline and diesel fuel) to operate heavy equipment, light-duty vehicles, machinery, and generators for lighting. Electrical power consumed for Program construction activities would be supplied from existing electrical infrastructure in the area, and temporary grid power may also be provided to construction trailers or electric construction equipment. Energy use would be temporary in nature, and construction equipment used would be typical of similar-sized construction projects in the region. In addition, the Program Contractor(s) would be required to restrict the idling of heavy-duty diesel motor vehicles in accordance with Title 13 California Code of Regulations Section 2449(d)(2) and Section 2485 and would utilize fleets that comply with the California Air Resources Board's Regulation of In-Use (On-Road) Heavy-Duty Diesel-Fueled Vehicles, which governs the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. Construction activities would utilize fuel-efficient equipment consistent with state and federal regulations to reduce the inefficient, wasteful, or unnecessary consumption of energy. The Program Contractor(s) would also be required to comply with applicable regulatory construction waste management practices to divert construction and demolition debris. Overall, these practices would reduce the potential for wasteful, inefficient, or unnecessary consumption of energy resources to occur during Program construction activities.

Operations and maintenance activities at the Weymouth Plant would remain generally similar to existing conditions once construction activities are completed. The Administration and Control Buildings would resume normal operations, and water treatment chemical deliveries along the railroad tracks would remain at the same frequency. There would be no change to the number of employees, equipment, or material deliveries at the New La Verne Warehouse facilities. The new Field Engineering Building would accommodate the same number of employees and functions as the existing Field Engineering Building, which may be repurposed for storage or other non-occupancy use ancillary to plant operations.

Upon completion of Program construction activities, the improved Water Quality Laboratory Building would accommodate approximate five to ten new employees, which would increase fuel consumption associated with employee commutes. However, these vehicles would comply with

federal and State standards that regulate fuel economy and GHG emissions, such as the Corporate Average Fuel Economy standards and California Air Resources Board's low emission regulations. The improved Water Quality Laboratory Building would also accommodate new lab equipment that may result in increased energy consumption. However, the Water Quality Laboratory Building would be designed and constructed to achieve LEED Gold certification and the new field engineering building would be designed and constructed to achieve LEED Silver certification, which would require the incorporation of additional energy and water efficiency features. In addition, operation of this equipment for water quality testing activities is necessary to ensure the continued safe and reliable provision of potable water to Metropolitan's service area. Therefore, the increased energy usage would not be wasteful, inefficient, or unnecessary.

Energy efficiency at the Weymouth Plant would also be improved in some ways as a result of the proposed Program due to utility upgrades to the Water Quality Laboratory Building; new insulation, walls, and rooftops at the Central Stores and General Store buildings as part of the New La Verne Warehouse Facilities project; and mechanical, electrical, and plumbing improvements at the Administration and Control Buildings. The Basin Nos. 1 and 2 Rehabilitation project would also likely improve the energy efficiency of these facilities due to upgraded components. Overall, Program construction and operation would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. Therefore, no impact would occur, and further analysis in the Draft EIR is not warranted.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Impact. The proposed Program would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. In May 2022, Metropolitan adopted its Climate Action Plan (CAP), which includes measures for renewable energy and energy efficiency. Of these measures, Measure EE-1 would be applicable to the proposed Program. This measure focuses on converting all interior and exterior lighting at 50 percent of Metropolitan facilities to LED technologies by 2030 and 100 percent by 2045. The Water Quality Laboratory Building Improvements project, Administration and Control Buildings Seismic Upgrade and Building Improvements project, New La Verne Warehouse Facilities project, and New Field Engineering Building project would incorporate interior and exterior LED lighting. Therefore, the Project would be consistent with Measure EE-1 of the CAP and would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. No impact would occur, and further analysis in the Draft EIR is not warranted.

3.7 Geology and Soils

GEOLOGY AND SOILS Would the Program:	Potentially Significant Impact	Less than Significant 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 groundshaking?	☐	☐	☐	☒
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on geologic units or soil that is unstable, or that would become unstable as a result of the Program, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☐	☒
d) Be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2010), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

Significance criteria established by CEQA Guidelines, Appendix G.

Discussion. Would the Program:

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.

No Impact. The proposed Program would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving the rupture of an earthquake fault mapped as part of an Alquist-Priolo Earthquake Fault Zone (APEFZ). The Program site is not within or in the immediate vicinity of a mapped APEFZ. The nearest mapped APEFZ to the Program site is the San Jose Fault, located approximately six miles northeast (DOC 2022; Southern California Earthquake Data Center 2022). No areas of high earthquake risk are identified in the vicinity of the Program site (California Governor's Office of Emergency Services 2015). Thus, the potential for ground rupture to occur at the Program site in connection with this fault is low. The proposed Program includes seismic retrofits and upgrades to the Water Quality Laboratory Building and Administration and Control Buildings, which would reduce seismic hazard risks as

compared to existing conditions. Furthermore, design and construction of the new La Verne Warehouse facilities and new Field Engineering Building would conform to the current seismic design provisions of the California Building Code (California Code of Regulations Title 24), as applicable, to minimize potential risks. Thus, the Program would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death, as a result of fault rupture. No impact would occur, and further analysis in the Draft EIR is not warranted.

ii) Strong seismic groundshaking?

No Impact. The proposed Program would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. As discussed under threshold (a)(i), the Program site is not within or in the immediate vicinity of a mapped APEFZ, and no areas of high earthquake risk are identified in the vicinity of the Program site. Thus, the potential for strong seismic groundshaking to occur at the Program site is low. In addition, the proposed Program includes seismic retrofits and upgrades to the Water Quality Laboratory Building and Administration and Control Buildings, which would reduce seismic hazard risks as compared to existing conditions. Furthermore, design and construction of the new La Verne Warehouse facilities and new Field Engineering Building would conform to the current seismic design provisions of the California Building Code (California Code of Regulations Title 24), as applicable, to minimize potential risks. Thus, the Program would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death, as a result of seismic ground-shaking. No impact would occur, and further analysis in the Draft EIR is not warranted.

iii) Seismic-related ground failure, including liquefaction?

No Impact. The proposed Program would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. The Program site is not located within or directly adjacent to a mapped liquefaction area. The nearest mapped liquefaction area is 0.1 mile southwest of the southern terminus of the off-site portion of the water treatment chemical delivery tracks alignment, across Arrow Highway (California Governor's Office of Emergency Services 2015). Thus, the Program would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death, as a result of seismic-related ground failure (including liquefaction). No impact would occur and further analysis in the Draft EIR is not warranted.

iv) Landslides?

No Impact. The proposed Program would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including landslides. The Program site is not located in a landslide zone The nearest mapped landslide zone is approximately 0.6 mile south of the Program site (United States Geological Survey [USGS] 2022). Thus, the Program would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death, as a result of landslides. No impact would occur and further analysis in the Draft EIR is not warranted.

b. Result in substantial soil erosion or the loss of topsoil?

Less than Significant. The proposed Program would not result in substantial soil erosion or the loss of topsoil. The Program site has been previously disturbed from the original construction of

the Weymouth Plant and off-site water treatment chemical delivery railroad tracks. The majority of Program construction activities would occur in areas covered by impervious surfaces and would not result in soil erosion or loss of topsoil. In addition, each project within the proposed Program that disturbs more than one acre would be subject to the requirements of the NPDES Construction General Permit (Order No. 2009-0009-DWQ as amended by 2010-0014-DWQ and 2012-0006-DWQ). The Construction General Permit requires the development of a Stormwater Pollution Prevention Plan (SWPPP) to reduce erosion and topsoil loss from stormwater runoff during construction activities. Compliance with the requirements set forth in this permit would require the Program Contractor(s) to implement best management practices (BMPs) during construction to prevent substantial soil erosion or the loss of topsoil. Compliance with NPDES permit requirements would minimize the potential for Program construction to result in substantial soil erosion or the loss of topsoil. Projects that do not disturb more than one acre would instead be subject to Metropolitan's standard requirements for preparation of a Water Quality Control Plan, which similarly includes requirements for construction BMPs to minimize soil erosion. Furthermore, the nature of operations and maintenance activities at the Weymouth Plant would be similar to existing conditions once construction activities are completed and would not involve new activities that would induce soil erosion or loss of topsoil. As such, Program operation would not have the potential to result in substantial soil erosion or loss of topsoil. Thus, impacts related to soil erosion and loss of topsoil would be less than significant, and further analysis in the Draft EIR is not warranted.

c. Be located on geologic units or soil that is unstable, or that would become unstable as a result of the Program, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

No Impact. The proposed Program would not be located on or result in unstable geologic deposits or soils such that on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse would potentially occur. The proposed Program involves four improvement projects and two new construction projects at the existing Weymouth Plant and off-site water treatment chemical delivery railroad tracks. As discussed under thresholds (a)(i) through (a)(iv), no landslides have been documented at the Program site, and the Program site is not located in a landslide zone (USGS 2022). In addition, the Program would not include activities that would increase the potential for subsidence, liquefaction, or collapse. Furthermore, the nature of operations and maintenance activities at the Weymouth Plant would be similar to existing conditions once Program construction is completed and would not involve new activities that would result in soil instability. Thus, the Program would not result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse. No impact would occur, and further analysis in the Draft EIR is not warranted.

d. Be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2010), creating substantial direct or indirect risks to life or property?

Less than Significant. The Program site is located on expansive soil, but the Program would not create substantial direct or indirect risks to life or property. Section 15.04.110 of the La Verne Municipal Code states that unless otherwise specified by a registered geotechnical engineer, foundation systems within the City of La Verne are considered to be on expansive soil. The New La Verne Warehouse Facilities and New Field Engineering Building projects would be required to comply with all applicable requirements of the California Building Code. Upgrades to the Water

Quality Laboratory Building and Administration and Control Buildings would similarly be subject to state and local building codes. Therefore, these Program components would have low potential to create substantial direct or indirect risks to life or property related to expansive soils. The remaining Program components, such as the Water Treatment Chemical Delivery Railroad Tracks and Basin Nos. 1 and 2, would involve upgrades to existing facilities that would result in no change in the level of risk related to expansive soils as compared to existing conditions. As such, impacts would be less than significant, and further analysis in the Draft EIR is not warranted.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The proposed Program does not require the use or installation of septic tanks or alternative wastewater disposal systems. No impact would occur, and further analysis in the Draft EIR is not warranted.

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than Significant. The proposed Program would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. There are no previously recorded paleontological resources at the Weymouth Plant (Metropolitan 2005). The Weymouth Plant is located on recent alluvium, tertiary volcanic flow rock, and older metamorphic deposits, and excavation activities thus have a low probability of yielding significant paleontological resources. Replacement of the off-site portion of the water treatment chemical delivery railroad tracks would require shallow ground disturbance that would similarly have a low probability of yielding significant paleontological resources. The Weymouth Plant has also been highly disturbed by over 80 years of construction and operational activities. In addition, the plant does not contain any unique geologic features. Furthermore, in accordance with Metropolitan standard practice, if unanticipated paleontological resources are discovered during Program construction, the Program Contractor(s) would be required to comply with specific procedures related to the protection of paleontological resources, which include stopping work within 50 feet of the discovery, protecting the discovery area, and notifying the Metropolitan project engineer who would then consult with a qualified paleontologist regarding the find. Therefore, construction and operation of the proposed Program would not directly or indirectly destroy a unique paleontological resource or unique geologic feature. Impacts would be less than significant, and further analysis in the Draft EIR is not warranted.

3.8 Greenhouse Gas Emissions

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

Significance criteria established by CEQA Guidelines, Appendix G.

OVERVIEW OF GHG EMISSIONS

In May 2022, Metropolitan adopted a Climate Action Plan (CAP) and certified the associated Program Environmental Impact Report (PEIR). Metropolitan's CAP complies with the requirements of CEQA Guidelines Section 15183.5(b)(1) for a qualified greenhouse gas (GHG) emissions reduction plan, and as such, can be used to streamline and tier CEQA GHG analysis and mitigate for GHG impacts associated with construction and operational activities (Metropolitan 2022). The CAP includes a baseline GHG emissions inventory of Metropolitan's operations from 1990 through 2020 and a GHG emissions forecast through 2045. The CAP established Metropolitan's GHG emissions reduction targets to be consistent with Senate Bill 32 (40 percent reduction below 1990 levels by 2030) and the recently signed Assembly Bill 1279, which codifies the State's goal of achieving carbon neutrality by 2045. The CAP also establishes actions and policies that Metropolitan could implement to achieve its GHG reduction targets.

The CAP includes a suite of GHG emissions reduction measures to be implemented that would reduce Metropolitan's GHG emissions to achieve the adopted emissions reduction targets established in the CAP. By following its emissions reduction measures, Metropolitan would exceed the State's target of 40 percent below 1990 levels by 2030 and make significant progress toward ultimately achieving carbon neutrality by 2045 (Metropolitan 2022).

Discussion. Would the Program:

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

Potentially Significant. The proposed Program may directly or indirectly generate GHG emissions that may have a significant impact on the environment. Program construction activities would generate temporary GHG emissions through the use of construction vehicles and equipment, haul trips for demolished materials, and transport of workers and materials to and from the work site. In addition, operational emissions may increase upon completion of construction activities due to a minor increase in employees at the expanded Water Quality Laboratory Building.

Pursuant to CEQA Guidelines Section 15183.5(a) and 15183.5(b), Metropolitan can streamline the CEQA review of its projects using the GHG emissions analysis completed for the CAP if the proposed Program is consistent with the adopted CAP. Construction and operational GHG emissions generated by the proposed Program will be estimated and analyzed for consistency with the CAP, and an analysis will be conducted to ensure feasible emissions reduction measures listed in the CAP are incorporated into the proposed Program. Although, estimates of GHG emissions will be quantified for CEQA analysis purposes, Metropolitan would also quantify and document

actual construction and operational GHG emissions for the Program during Program construction and operational activities. Actual GHG emissions would be tracked, monitored, and reported as described in the CAP. An annual progress report would be prepared, and emissions reporting would be available through a tracking tool on Metropolitan's website.

Therefore, impacts may be considered potentially significant and a GHG emissions technical report shall be prepared to further analyze this topic. The proposed Program's impacts will be detailed further in the Draft EIR, and feasible mitigation measures, as required, will be proposed.

b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

Potentially Significant. The proposed Program may conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Although Metropolitan adopted the CAP and certified the associated PEIR in May 2022, actual analysis has not yet been conducted to determine whether the proposed Program would be consistent with the CAP. Therefore, impacts may be potentially significant, and a GHG emissions technical report shall be prepared to further analyze this topic. The Program's impacts will be detailed further in the Draft EIR, and feasible mitigation measures, as required, will be proposed.

3.9 Hazards and Hazardous Materials

HAZARDS AND HAZARDOUS MATERIALS Would the Program:		Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e)	For a Program 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 Program result in a safety hazard or excessive noise for people residing or working in the Program 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?	☐	☐	☐	☒

Significance criteria established by CEQA Guidelines, Appendix G.

Discussion. Would the Program:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less than Significant. The proposed Program would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials that would create a significant risk to the public or environment.

Construction of the proposed Program would temporarily increase the transport and use of hazardous materials during routine construction activities. Limited quantities of miscellaneous hazardous substances, such as diesel fuel, oil, solvents, and other similar construction-related materials, would be brought onto the Program site, used, and stored during the construction period. These materials would be disposed off-site in accordance with applicable laws pertaining to the handling and disposal of hazardous waste. The transport, use, and storage of hazardous materials during construction would be conducted in accordance with applicable federal and State laws, such as the Hazardous Materials Transportation Act, California Hazardous Material Management Act, and California Code of Regulations Title 22.

Railroad tracks are often associated with several chemical constituents of concern (COCs), including creosote,[2] which is used to preserve the railroad ties, and herbicides to suppress vegetation growth. Other COCs associated with railroad tracks may include metals, petroleum hydrocarbons, and less frequently, pesticides. As a result, if these COCs are present in the soils along the water treatment chemical delivery railroad tracks, ground disturbance generating fugitive dust during track replacement would have the potential to result in the release of hazardous materials into the environment. Rincon Consultants, Inc. prepared a Hazardous Materials Technical Report to document whether COCs are present in the soil along the water treatment chemical delivery railroad tracks in concentrations that may warrant remediation or mitigation prior to or during Project implementation. The Hazardous Materials Technical Report is attached as Appendix B. Soil sampling was conducted on July 11 and October 4, 2022. Soil samples were analyzed for metals; mercury; total petroleum hydrocarbons in the gasoline, diesel, and oil ranges; creosote, pyrene, and acenaphthene; organochlorine pesticides; and chlorinated herbicides. Contaminant concentrations were compared to the San Francisco Bay RWQCB Environmental Screening Levels (ESLs) for Direct Exposure to Human Health Risk Levels for commercial/industrial uses with shallow soil exposure and construction worker exposure.[3] In addition, soil analytical results were compared to hazardous waste screening criteria to determine if soil along the railroad tracks may be characterized as a hazardous waste. For samples with an exceedance of the hazardous waste screening criteria, additional analysis was performed for comparison to California and federal hazardous waste criteria (Appendix B).

Based on the findings in the Hazardous Materials Technical Report, the concentrations of total petroleum hydrocarbons, pyrene, acenaphthene, chlorinated herbicides, and organochlorine pesticides in the analyzed soil samples were either not detected (i.e., below laboratory reporting limits), or were detected below the respective ESLs for commercial/industrial and construction worker exposure scenarios. Lead was detected in a single soil sample at six inches below ground surface in slight exceedance of the construction worker ESL near the southern terminus of the railroad tracks alignment. Construction worker ESLs assume eight hours of daily exposure over a one-year period; therefore, the actual human health risk to construction workers associated with this single detection of lead in slight exceedance of the ESL is negligible because of the anticipated short-term nature (approximately one to three days) of construction activities that would disturb impacted soil at this specific location (Appendix B). In addition, lead concentrations in exceedance of California hazardous waste criteria (but below federal hazardous waste criteria) were detected at two sampling locations near the southern terminus of the railroad tracks alignment. The soil designated as California hazardous waste was delineated by step-out sampling and is limited to an approximately five-foot by 10-foot rectangle, extending to a depth of approximately one foot below ground surface. The total volume of soil with lead concentrations exceeding California hazardous waste criteria is estimated to be less than two cubic yards (Appendix B). Because soil in this area exceeds the California hazardous waste criteria for lead, Metropolitan would be required to comply with applicable regulations, including California Code of Regulations Title 22, to remove and dispose of this soil at an appropriately licensed facility. In addition, because of the presence of creosote-like material on the railroad ties and detection of low levels of pyrene and acenaphthene in soil samples, Metropolitan would prepare and implement a Soil Management Plan

[2] Creosote is a wood preservative derived from the distillation of wood or coal.

[3] While developed by the San Francisco Bay RWQCB, the ESLs are applicable as conservative (i.e., protective) screening levels across all nine RWQCB regions, including the Los Angeles Region (Region 4).

for the Water Treatment Chemical Delivery Railroad Tracks Replacement project in accordance with Metropolitan standard practice. The Soil Management Plan would provide guidance for management of visually impacted or odiferous soils that may be encountered during demolition and grading activities at the Program site and would provide a framework for minimizing fugitive dust during construction activities. Compliance with SCAQMD Rule 403 would also reduce dust generation during Program construction, thereby decreasing the potential for contaminated particulate matter to become airborne. Metropolitan would also manage railroad ties preserved with creosote in accordance with applicable California Department of Toxic Substances Control (DTSC) requirements, as outlined in the *DTSC Requirements for Generators of Treated Wood Waste Fact Sheet* (2021), during railroad track replacement. Compliance with applicable regulations and Metropolitan standard practice would minimize the potential for railroad track replacement to create a significant hazard to the public or the environment. As such, Program construction would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant, and further analysis in the Draft EIR is not warranted.

Upon the completion of construction activities, the nature of operations and maintenance activities at the Weymouth Plant would be similar to existing conditions. Specifically, the quantity, frequency, and timing of water treatment chemical deliveries to the site would remain the same as under existing conditions. As such, Program operations would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant, and further analysis in the Draft EIR is not warranted.

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less than Significant. The proposed Program would not 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.

As noted under threshold (a), construction of the proposed Program would temporarily increase the transport and use of hazardous materials during the routine construction activities that could cause an upset or accident. If such conditions result in a release of hazardous materials into the environment, potential impacts could occur, such as water quality degradation of nearby water bodies. However, the majority of Program construction activities would occur within the Weymouth Plant in areas covered by impervious surfaces and buffered from nearby water bodies by existing residential, commercial, and institutional land uses. Construction activities associated with replacement of the water treatment chemical delivery railroad tracks would occur within 30 feet of the open concrete-lined Marshall Canyon Channel. However, construction would not encroach into the concrete drainage facility at this location because of implementation of standard BMPs, such as secondary containment and locating containers away from potential drainage areas. In addition, in accordance with Metropolitan standard practice, hazardous materials would be stored away from storm drains in covered, leak-proof containers when not in use and would be protected from rainfall infiltration and ground permeation in the event of an accidental spill. Construction materials also would not be placed in areas where they could be washed into a drainage course or channel during the rainy season, pursuant to Metropolitan standard practice. Therefore, Program construction would not 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. Impacts would be less than significant, and further analysis in the Draft EIR is not warranted.

Upon completion of construction activities, operations and maintenance activities at the Weymouth Plant would be similar to existing conditions. Specifically, the quantity, frequency, and timing of water treatment chemical deliveries to the site would remain the same as under existing conditions. As such, Program operation would not 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. Impacts would be less than significant, and further analysis in the Draft EIR is not warranted.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less than Significant. The proposed Program would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school such that significant impacts would occur. Three schools are located within 0.25 mile of the Program site – Grace Miller Elementary School (approximately 100 feet to the east of the Weymouth Plant), Calvary Baptist School (approximately 100 feet to the west of the Weymouth Plant), and Joan Macy School (approximately 915 feet to the west of the southern terminus of the water treatment chemical delivery railroad tracks). As discussed under threshold (b), ground disturbance could generate fugitive dust during excavation activities and railroad ties removal for the water treatment chemical delivery railroad tracks that would have the potential to result in the release of hazardous materials, such as lead, into the environment. However, the soil designated as California hazardous waste is limited to an approximately five-foot by 10-foot rectangle, extending to a depth of approximately one foot below ground surface, near the southern terminus of the railroad tracks alignment. This location is approximately 0.21 mile from the nearest school (the Joan Macy School). In addition, the total volume of soil with lead concentrations exceeding California hazardous waste criteria is estimated to be less than two cubic yards and would require a short timeframe (approximately one to three days) for removal. In addition, Metropolitan would prepare and implement a Soil Management Plan for the Water Treatment Chemical Delivery Railroad Tracks Replacement project in accordance with Metropolitan standard practice, which would provide a framework for minimizing fugitive dust during construction activities. Compliance with applicable regulations and Metropolitan standard practice would minimize the potential for fugitive dust generation during railroad track replacement to result in hazardous emissions. As such, Program construction would not result in a significant environmental impact due to hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. Impacts would be less than significant, and further analysis in the Draft EIR is not warranted.

Upon the completion of construction activities, the nature of operations and maintenance activities at the Weymouth Plant would be similar to existing conditions. Specifically, the quantity, frequency, and timing of water treatment chemical deliveries to the site would remain the same as under existing conditions. As such, Program operation would not result in a significant environmental impact due to hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. Impacts would be less than significant, and further analysis in the Draft EIR is not warranted.

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

Less than Significant. The proposed Program is located on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, but the Program would not create a significant hazard to the public or the environment as a result. To identify potential hazardous materials sites near the project area, a desktop review of the lists of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (i.e., the Cortese list) was conducted, which consists of the following:

- Hazardous Waste and Substances sites in the DTSC's EnviroStor database (DTSC 2022a)
- Hazardous waste facilities subject to corrective action pursuant to the State of California's Health and Safety Code Section 25187.5 (DTSC 2022b)
- Leaking Underground Storage Tank Sites in the SWRCB's GeoTracker database (SWRCB 2022a)
- Solid waste disposal sites with waste constituents above hazardous waste levels outside the waste management unit (SWRCB 2022b); and
- Active Cease and Desist Orders and Cleanup and Abatement Orders (SWRCB 2022c).

The Program site is listed in the SWRCB GeoTracker Database as a Leaking Underground Storage Tank Cleanup Site (SWRCB 2022a). However, the site was cleaned up and the case closed in 1991 (SWRCB 2022d). The Program site is not included on any other portions of the Cortese list. Impacts would be less than significant, and further analysis in the Draft EIR is not warranted.

e. For a Program 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 Program result in a safety hazard or excessive noise for people residing or working in the Program area?

No Impact. The proposed Program would not result in a safety hazard or excessive noise for people residing or working in the Program Area due to proximity to a public airport or public use airport. Brackett Field Airport is located approximately 0.6 mile south of the southernmost portion of the Program site (the off-site portion of the water treatment chemical delivery railroad tracks), and a portion of the Program site falls within its Airport Influence Area. However, the Program site is not located within the noise contours or the arrival and departure risk contours of this airport (Los Angeles County Airport Land Use Commission 2015). In addition, the proposed Program does not involve the construction of residences or a change in the existing land use of the Program site. As such, the Program would not introduce new residents or activities into an area that may be subject to safety hazards or excessive noise from an airport. Therefore, no impact related to safety hazards and excessive noise from airport operations would occur, and further analysis in the Draft EIR is not warranted.

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less than Significant. The proposed Program would not impair implementation of or physically interfere with an adopted emergency plan or evacuation plan. The City of La Verne Emergency Response Plan contained in the La Verne General Plan is the applicable emergency response plan for the vicinity of the Program site (City of La Verne 1998). Construction and operation of the proposed Program would conform to all Los Angeles Department of Transportation, City of La Verne Police Department, and City of La Verne Fire Department access standards to allow adequate emergency access. The majority of Program construction activities would occur within the boundaries of the Weymouth Plant and would not affect emergency routes or emergency access points at the plant or in the local vicinity. Construction vehicle traffic outside the Program site may slow traffic or hinder some circulation around the immediate vicinity of the Program site. However, impacts to local emergency access would be temporary and limited to the construction period. In addition, Metropolitan standard practice includes requiring the Contractor(s) to provide appropriate advance warning signage to alert motorists to the potential for construction vehicle cross-traffic from the work limits in accordance with California Department of Transportation standards.

The Water Treatment Chemical Delivery Railroad Tracks Replacement project would require temporary, short-term partial or full closures of intersections along the railroad tracks alignment, which may impede local emergency access. However, as required by Metropolitan standard practice, the Program contractor(s) would be required to prepare a traffic control plan and implement temporary traffic control to minimize the potential to interfere with local emergency access. In addition, this Program component would not permanently alter the design or configuration of public roadways because it would replace the existing railroad tracks along their current alignment. Therefore, due to the temporary and short-term nature of the impact, conformance to existing County and City regulations, and implementation of Metropolitan standard practice, the proposed Program would not impair implementation or physically interfere with the City of La Verne Emergency Response Plan. Impacts would be less than significant, and further analysis in the Draft EIR is not warranted.

g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The proposed Program would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. The Program site is not located in a State Responsibility Area or lands classified as a Very High Fire Hazard Severity Zone (VHFHSZ). The nearest VHFHSZ or State Responsibility Area is approximately 0.9 mile north of the Program site and is separated from the Program site by intervening development, including Interstate 210 and State Route 66 (California Department of Forestry and Fire Protection 2022). Therefore, the Program would have no potential to expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. No impact would occur, and further analysis in the Draft EIR is not warranted.

3.10 Hydrology and Water Quality

HYDROLOGY AND WATER QUALITY Would the Program:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Violate Regional Water Quality Control Board 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 Program may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on or off site?	☐	☐	☒	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☒	☐
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
iv. Impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to Program inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Significance criteria established by CEQA Guidelines, Appendix G.

Discussion. Would the Program:

a. Violate Regional Water Quality Control Board water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less than Significant. The proposed Program would not violate RWQCB water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. The Program would not involve work within waterbodies or create a waste that would be subject to regulation under waste discharge requirements. The nearest waterbodies to the Program site include Marshall Canyon Channel located adjacent to the southern end of the water treatment chemical delivery railroad tracks that are proposed for replacement, Marshall Creek located 100 feet to the east of the Program site, Live Oak Wash located 0.4 mile to the southeast of the Program site, Puddingstone Reservoir located 1.4 miles to the south of the Program site, Live Oak Reservoir located 1.8 miles to the northeast of the Program site, and San Dimas Wash located 2.3 miles to the north of the Program site (USFWS 2022). The portion of Marshall Creek near the Weymouth Plant (from approximately 150 feet north of Holly Oak Street south to First Street) is an underground concrete channel. Upstream and downstream of this concrete portion, Marshall Creek consists of an open channel with a combination of concrete and natural bottoms. Marshall Creek daylights to an open concrete channel near Arrow Highway and the BNSF railroad tracks and becomes Marshall Canyon Channel.

Grading, excavation, and other activities associated with construction of the proposed Program could result in soil disturbance in some areas that could degrade water quality through potential erosion and subsequent sedimentation. Program construction would also involve the use and handling of chemicals such as concrete, cement, oil, fuels, and lubricants that could be accidentally released during spill events and adversely impact nearby water bodies if released materials come into contact with stormwater runoff. However, the majority of Program construction activities would occur within the Weymouth Plant in areas covered by impervious surfaces and buffered from nearby water bodies by existing residential, commercial, and institutional land uses. Construction activities associated with replacement of the water treatment chemical delivery railroad tracks would occur within 30 feet of the open Marshall Canyon Channel. However, construction would not encroach into the concrete drainage facility at this location. In addition, in accordance with Metropolitan standard practice, hazardous materials would be stored away from storm drains in covered, leak-proof containers when not in use and would be protected from rainfall infiltration and ground permeation in the event of an accidental spill. Construction materials also would not be placed in areas where they could be washed into a drainage course or channel during the rainy season, pursuant to Metropolitan standard practice. Furthermore, as discussed in Section 3.7 (Geology and Soils), each project within the proposed Program would either be subject to the requirements of the NPDES Construction General Permit or Metropolitan's standard requirements for preparation of a Water Quality Control Plan, which would prevent water quality impacts associated with stormwater runoff. The nature of operations and maintenance activities at the Weymouth Plant would be similar to existing conditions once construction activities are completed and would not result in any new sources of potential water quality pollutants. As a result, the Program would not violate RWQCB water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Impacts would be less than significant, and further analysis in the Draft EIR is not warranted.

b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Program may impede sustainable groundwater management of the basin?

No Impact. The proposed Program would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Program may impede sustainable groundwater management of the basin. Program construction activities would not require dewatering, and no groundwater supplies would be used during Program construction or operation. In addition, Program construction activities would occur largely in areas covered by impervious surfaces, and the installation of any new impervious surfaces would be minimal and would not have the potential to substantially interfere with groundwater recharge. Therefore, the Program would have no impact to groundwater supplies, and further analysis in the Draft EIR is not warranted.

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?

Less than Significant. The proposed Program would not substantially alter the existing drainage pattern or topography of the site or area in a manner that would result in substantial erosion or

siltation on or off site. The majority of Program construction activities would occur in areas currently covered by impervious surfaces, and the installation of new impervious surfaces (i.e., New La Verne Engineering Building) that could change/alter the drainage pattern or topography of the site would be minimal. Furthermore, the nature of operations and maintenance activities at the Weymouth Plant would be similar to existing conditions once construction activities are completed. Therefore, the Program would result in minimal alterations to the existing drainage pattern of the Program site, and such alterations would have low potential to result in substantial erosion on or off site. Impacts would be less than significant, and further analysis in the Draft EIR is not warranted.

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. The proposed Program would not substantially alter the existing drainage pattern of the site or area in a manner that would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site. As discussed under threshold (c)(i), the Program would result in minimal alterations to the existing drainage pattern of the Program site, and such alterations would have low potential to substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site. Impacts would be less than significant, and further analysis in the Draft EIR is not warranted.

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

Less than Significant. The proposed Program would not substantially alter the existing drainage pattern of the site or area in a manner that would create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff water. As discussed under threshold (c)(i), the Program would result in minimal alterations to the existing drainage pattern of the Program site, and such alterations would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff water. Impacts would be less than significant, and further analysis in the Draft EIR is not warranted.

iv) Impede or redirect flood flows?

Less than Significant. The proposed Program would not substantially alter the existing drainage pattern of the site or area in a manner that or impede or redirect flood flows. As discussed under threshold (c)(i), the Program would result in minimal alterations to the existing drainage pattern of the Program site, and such alterations would not create or contribute runoff water that would impede or redirect flood flows. Impacts would be less than significant, and further analysis in the Draft EIR is not warranted.

d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to Program inundation?

No Impact. The proposed Program would not result in the potential for pollutants to be released to the environment by inundation of the Program site during flood, tsunami, or seiche events. The

Program site is located approximately 40 miles east of the Pacific Ocean; therefore, it is not located in a tsunami zone. In addition, the Program site is not located in a flood hazard zone. The nearest flood hazard zone is approximately 0.5 mile southwest of the Program site (Federal Emergency Management Administration 2021). The Program site is also not located within the range of a seiche hazard zone because there are no large bodies of water within one mile of the Program site. Therefore, the Program would not risk release of pollutants due to inundation in a flood hazard, tsunami, or seiche zone. No impact would occur, and further analysis in the Draft EIR is not warranted.

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact. The proposed Program would not conflict with or obstruct implementation of an applicable water quality control plan or sustainable groundwater management plan. The applicable water quality control plan for the Program site vicinity is the *Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (Basin Plan; Los Angeles RWQCB 2014). As discussed under threshold (a), multiple water bodies are located in the vicinity of the Program site (USFWS 2022). However, the majority of Program construction activities would occur in areas covered by impervious surfaces, and as discussed under threshold (a), the Program Contractor(s) would be required to implement BMPs for sediment control, erosion control, non-stormwater, and waste and material management to prevent sediment and chemicals used on the site from washing into surface waters. The Program site overlies the San Gabriel Valley Groundwater Basin, which was assigned a "very low" prioritization by the California Department of Water Resources (2022). No sustainable groundwater management plan has been adopted for this basin. Therefore, the proposed Program would not conflict with or obstruct implementation of the Basin Plan. No impact would occur, and further analysis in the Draft EIR is not warranted.

3.11 Land Use and Planning

LAND USE PLANNING Would the Program:		Potentially Significant Impact	Less than Significant 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?	☐	☐	☐	☒

Significance criteria established by CEQA Guidelines, Appendix G.

Discussion. Would the Program:

a. Physically divide an established community?

No Impact. The proposed Program would not physically divide an established community. The proposed Program involves four improvement projects and two new construction projects that would occur primarily within the Weymouth Plant as well as along the existing alignment of the off-site portion of the water treatment chemical delivery railroad tracks. No impact would occur, and further analysis in the Draft EIR is not warranted.

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?

No Impact. The majority of Program components would be located within the Weymouth Plant, which has a General Plan land use designation of Community Facility/Freeway and is zoned Official (City of La Verne 1998 and 2016). The portion of the Water Treatment Chemical Delivery Railroad Tracks Replacement project located outside the Weymouth Plant also traverses parcels designated Low Density Residential and Medium Density Residential and zoned PR4.5D and PR10A (City of La Verne 1998 and 2016). Upon completion of construction activities, the Program site would remain in its current use as a water treatment plant and associated water treatment chemical delivery railroad tracks. The nature of operations and maintenance activities at the Weymouth Plant would be similar to existing conditions once construction of the proposed Program is complete. Therefore, the Program would not 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 would occur, and further analysis in the Draft EIR is not warranted.

3.12 Mineral Resources

MINERAL RESOURCES Would the Program:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Significance criteria established by CEQA Guidelines, Appendix G.

Discussion. Would the Program:

a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?

No Impact. The proposed Program would not 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. The Program site contains an existing water treatment plant and water treatment chemical delivery railroad tracks. No mineral recovery is occurring at the site currently, and the Program site and surrounding properties are not designated or zoned for mineral resource extraction (City of La Verne 1998 and 2016). The Program would not result in changes to the current land use of the Program site. Thus, the Program would result in no impacts, and further analysis in the Draft EIR is not warranted.

b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. The proposed Program 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. As discussed under threshold (a), mineral recovery is not occurring at the site currently, and the Program site and surrounding properties are not designated or zoned for mineral resource extraction (City of La Verne 1998 and 2016). The Program would not result in changes to the current land use of the Program site. Thus, the Program would result in no impacts to mineral resources, and further analysis in the Draft EIR is not warranted.

3.13 Noise

NOISE Would the Program:	Potentially Significant Impact	Less than Significant 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 Program 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 Program 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 Program expose people residing or working in the Program area to excessive noise levels?	☐	☐	☐	☒

Significance criteria established by CEQA Guidelines, Appendix G.

Discussion. Would the Program result in:

a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Program in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Potentially Significant. The proposed Program may generate a substantial temporary or permanent increase in ambient noise levels in excess of applicable standards. The Program site is generally surrounded by residential neighborhoods to the west, north, south, and east. The nearest schools are Grace Miller Elementary School located approximately 100 feet to the east and Calvary Baptist School located approximately 100 feet to the west. Program construction activities would temporarily generate an increase in ambient noise at these nearby sensitive receivers through the use of heavy-duty construction equipment as well as through increased traffic on Wheeler Avenue associated with construction worker travel, material deliveries, and haul trips for demolished materials. The nature of operations and maintenance activities at the Weymouth Plant would be generally similar to existing conditions once construction activities are complete. However, a new employee access gate would be constructed along Sedalia Avenue near its intersection with Forestdale Street, which would potentially increase existing traffic volumes and associated noise levels along Sedalia Avenue due to additional Metropolitan staff trips on this roadway. Therefore, noise impacts may be potentially significant, and a noise and vibration technical study will be prepared to further analyze the topic. The Program's noise impacts will be detailed further in the Draft EIR, and feasible mitigation measures, as required, will be proposed.

b. Generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant. The proposed Program may generate excessive groundborne vibration or groundborne noise levels. Program construction activities would temporarily generate an increase in vibration levels at nearby sensitive receivers (identified under threshold [a]) through the use of heavy-duty construction equipment as well as through increased traffic on Wheeler Avenue associated with construction worker travel, material deliveries, and haul trips for demolished materials. The nature of operations and maintenance activities at the Weymouth Plant would be similar to existing conditions once construction activities are complete and would not introduce new substantial groundborne vibration or groundborne noise levels sources. Nevertheless, noise

and vibration impacts may be potentially significant during Program construction activities, and a noise and vibration technical study will be prepared to further analyze the topic. The Program's vibration impacts will be detailed further in the Draft EIR, and feasible mitigation measures, as required, will be proposed.

c. For a Program 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, expose people residing or working in the Program area to excessive noise levels?

No Impact. The proposed Program would not expose people residing or working in the Program Area to excessive noise levels. Brackett Field Airport is located approximately 0.6 mile south of the southernmost portion of the Program site (the off-site portion of the water treatment chemical delivery railroad tracks), and the Program site falls within its Airport Influence Area. However, the Program site is not located with the noise contours of this airport (Los Angeles County Airport Land Use Commission 2015). Therefore, the Program would result in no impacts related to the exposure of people working in the Program area to excessive noise levels from airport operations, and further analysis in the Draft EIR is not warranted.

3.14 Population and Housing

POPULATION AND HOUSING Would the Program:	Potentially Significant Impact	Less than Significant 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?	☐	☐	☐	☒

Significance criteria established by CEQA Guidelines, Appendix G.

Discussion. Would the Program:

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)?

No Impact. The proposed Program would not directly or indirectly induce substantial unplanned growth in the Program area. The Program does not propose construction of new homes and thus would not directly induce population growth in La Verne. The Program does not include the construction of new water supply facilities or the expansion of treatment capacity and therefore would not increase water supply to the region or otherwise indirectly induce population growth. The nature of operations and maintenance activities at the Weymouth Plant would remain similar to existing conditions once construction activities are completed. The expanded Water Quality Laboratory Building would accommodate approximately five to ten additional Metropolitan employees. However, these employees likely already live in Southern California and would not require new homes to be constructed. Thus, the Program would not directly or indirectly induce substantial unplanned population growth. No impact would occur, and further analysis in the Draft EIR is not warranted.

b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The proposed Program would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. The Program site consists of a water treatment plant and railroad tracks owned by Metropolitan and does not contain occupied dwelling units. As such, the proposed Program would not displace any people or housing. No impact would occur, and further analysis in the Draft EIR is not warranted.

3.15 Public Services

PUBLIC SERVICES

Would the Program 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:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Fire protection?	☐	☐	☒	☐
b) Police protection?	☐	☐	☐	☒
c) Schools?	☐	☐	☐	☒
d) Parks?	☐	☐	☐	☒
e) Other public facilities?	☐	☐	☐	☒

Significance criteria established by CEQA Guidelines, Appendix G.

Discussion. Would the Program 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:

a. Fire protection?

Less than Significant. The proposed Program would not result in substantial adverse physical impacts associated with the provision of fire protection services. As discussed in Section 3.14 (Population and Housing), the proposed Program would not directly or indirectly induce population growth. The proposed Program would require an additional five to ten Metropolitan employees to work at the Water Quality Laboratory Building. However, this minimal increase in employees would not be substantial enough to increase the demand for additional or new fire protection services over that which is currently required for the Weymouth Plant. In addition, the proposed Program consists of four improvement and two new construction projects that would not increase the need for additional fire protection services at the Weymouth Plant. Thus, the proposed Program would not result in a need for new or physically altered fire protection services to maintain acceptable service ratios, response times, or other performance objectives. Impacts would be less than significant, and further analysis in the Draft EIR is not warranted

b. Police protection?

No Impact. The proposed Program would not result in substantial adverse physical impacts associated with the provision of police protection services. As discussed in Section 3.14 (Population and Housing), the proposed Program would not directly or indirectly induce population growth. The proposed Program would require an additional five to ten Metropolitan employees to work at the Water Quality Laboratory Building. However, this minimal increase in employees would not be substantial enough to increase the demand for additional or new police protection services. In addition, the proposed Program does not include components that would increase the need for additional police protection services over that which are currently required for the Weymouth Plant. Thus, the proposed Program would not result in a need for new or

physically altered police protection services to maintain acceptable service ratios, response times, or other performance objectives. No impact would occur, and further analysis in the Draft EIR is not warranted.

c. Schools?

No Impact. The proposed Program would not result in substantial adverse physical impacts associated with the provision of schools. Several schools are in proximity to the proposed Program site; however, as discussed in Section 3.14 (Population and Housing), the proposed Program would not directly or indirectly induce population growth. The approximately five to ten new additional employees required as the result of the Water Quality Laboratory Building project would not result in the need for new or physically altered schools to maintain acceptable service ratios or other performance objectives. No impact would occur, and further analysis in the Draft EIR is not warranted.

d. Parks?

No Impact. The proposed Program would not result in substantial adverse physical impacts associated with the provision of parks. As discussed in Section 3.14 (Population and Housing), the proposed Program would not directly or indirectly induce population growth. The five to ten new additional employees required as the result of the Water Quality Laboratory Building project would not result in a need for new or physically altered parks to maintain acceptable service ratios or other performance objectives. No impact would occur, and further analysis in the Draft EIR is not warranted.

e. Other public facilities?

No Impact. The proposed Program would not result in substantial adverse physical impacts associated with the provision other public facilities (i.e., other local public government services). As discussed in Section 3.14 (Population and Housing), the proposed Program would not directly or indirectly induce population growth. Thus, the proposed Program would not result in a need for other new or physically altered public facilities to maintain acceptable service ratios, response times, or other performance objectives. No impact would occur, and further analysis in the Draft EIR is not warranted.

3.16 Recreation

RECREATION Would the Program:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Would the Program 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 Program include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Significance criteria established by CEQA Guidelines, Appendix G.

Discussion.

a. Would the Program 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 proposed Program would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated. As discussed in Section 3.14 (Population and Housing), the proposed Program would not directly or indirectly induce population growth that would increase the use of existing neighborhood and regional parks or other recreational facilities. Therefore, no impact would occur to such facilities, and further analysis in the Draft EIR is not warranted.

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

No Impact. The proposed Program does not include recreational facilities or require the construction or expansion of recreational facilities. As such, no impact would occur, and further analysis in the Draft EIR is not warranted.

3.17 Transportation

TRANSPORTATION Would the Program:		Potentially Significant Impact	Less than Significant 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)	Would the Program conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☒	☐	☐	☐
c)	Substantially increase hazards due to a geometric design feature (5.g., sharp curves or dangerous intersections) or incompatible uses (5.g., farm equipment)?	☒	☐	☐	☐
d)	Result in inadequate emergency access?	☐	☐	☒	☐

Significance criteria established by CEQA Guidelines, Appendix G.

Discussion. Would the Program:

a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Potentially Significant. The proposed Program may conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Program construction activities would result in a temporary increase in traffic on Wheeler Avenue. Construction traffic in and out of the Weymouth Plant may create conflicts for vehicular and non-vehicular traffic on Wheeler Avenue due to frequent turning movements of trucks entering and exiting the site. Furthermore, the Water Treatment Chemical Delivery Railroad Tracks Replacement project would require temporary, short-term partial or full closures of intersections along the railroad tracks alignment, which may restrict local circulation patterns. Additionally, the proposed Program may include construction of an employee access gate near the intersection of Sedalia Avenue and Forestdale Street for the Water Quality Laboratory Building project. Therefore, these impacts may be potentially significant, and a transportation technical study will be prepared to further analyze this topic. The Program's impacts will be detailed further in the Draft EIR, and feasible mitigation measures, as required, will be proposed.

b. Would the Program conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Potentially Significant. The proposed Program may conflict or be inconsistent with *State CEQA Guidelines* Section 15064.3(b). Program construction activities would result in a temporary increase vehicle miles traveled in the local area due to construction worker, material delivery, and demolition hauling trips, and the incremental increase of approximately five to ten additional on-site employees associated with the expanded Water Quality Laboratory Building as well as the new employee access gate near the intersection of Sedalia Avenue and Forestdale Street may result in a long-term increase in vehicle miles traveled. Therefore, these impacts may be potentially significant, and a transportation technical study will be prepared to further analyze this topic. The Program's impacts will be detailed further in the Draft EIR, and feasible mitigation measures, as required, will be proposed.

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

Potentially Significant. The proposed Program may increase hazards due to a geometric design feature or incompatible uses. As discussed under threshold (a), construction traffic in and out of the Weymouth Plant may create conflicts for vehicular and non-vehicular traffic on Wheeler Avenue due to frequent turning movements of trucks entering and exiting the site. In addition, residences, schools, and parks are in proximity to the site. Residential and school land uses are typically more sensitive to the congestion and safety hazards that may be caused by the additional heavy truck traffic associated with Program construction due to potentially low baseline traffic levels on local roadways and frequent road crossings during school drop-off and pick-up times. Therefore, these impacts may be potentially significant, and a transportation technical study will be prepared to further analyze this topic. The Program's impacts will be detailed further in the Draft EIR, and feasible mitigation measures, as required, will be proposed.

d. Result in inadequate emergency access?

Less than Significant. The proposed Program would not result in inadequate emergency access. As discussed in Section 3.9 (Hazards and Hazardous Materials), construction and operation of the proposed Program would conform to all Los Angeles Department of Transportation, City of La Verne Police Department, and City of La Verne Fire Department access standards to allow adequate emergency access. The majority of Program construction activities would occur within the boundaries of the Weymouth Plant and would not affect emergency access points at the plant or in the local vicinity. Construction vehicle traffic outside the Program site may slow traffic or hinder some circulation around the immediate vicinity of the Program site. However, impacts to local emergency access would be temporary and limited to the construction period. In addition, Metropolitan standard practice includes requiring the Contractor(s) to provide appropriate advance warning signage to alert motorists to the potential for cross construction vehicle traffic from the work limits in accordance with California Department of Transportation standards.

The Water Treatment Chemical Delivery Railroad Tracks Replacement project would require temporary, short-term partial or full closures of intersections along the railroad tracks alignment, which may impede local emergency access. However, as required by Metropolitan standard practice, the Program contractor(s) would be required to prepare a traffic control plan and implement temporary traffic control to minimize the potential to interfere with local emergency access. Therefore, due to the temporary and short-term nature of the impact, conformance to existing County and City regulations, and implementation of Metropolitan standard practice, the proposed Program would not result in inadequate emergency access. Impacts would be less than significant, and further analysis in the Draft EIR is not warranted.

3.18 Tribal Cultural Resources

TRIBAL CULTURAL RESOURCES Would the Program:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Would the Program 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)?	☒	☐	☐	☐
ii. A resource determined by the Lead Agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the Lead Agency shall consider the significance of the resource to a California Native American tribe?	☒	☐	☐	☐

Discussion. Would the Program:

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)?

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?

Potentially Significant. The proposed Program may cause a substantial adverse change in the significance of a tribal cultural resource. Four California Native American tribes traditionally and culturally affiliated with the Project area have requested notification pursuant to Public Resources Code Section 21080.3.1. Notification letters will be mailed to these tribes on December 6, 2022. Additional letters will also be mailed to 15 tribal contacts provided by the Native American Heritage Commission. Consultation has not yet begun, but if consultation is requested, the results will be summarized in the Draft EIR. These consultation efforts shall determine whether the Program would cause a substantial adverse change in the significance of a tribal cultural resource. Because consultation has not yet been conducted, impacts to tribal cultural resources may be potentially significant. The Program's impacts will be detailed further in the Draft EIR, and feasible mitigation measures, as required, will be proposed.

3.19 Utilities and Service Systems

UTILITIES AND SERVICE SYSTEMS Would the Program:	Potentially Significant Impact	Less than Significant 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 stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
b) Have sufficient water supplies available to serve the Program 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 Program that it has adequate capacity to serve the Program 's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

Significance criteria established by CEQA Guidelines, Appendix G.

Discussion. Would the Program:

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction of which could cause significant environmental effects?

No Impact. The proposed Program would not require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunication facilities. The proposed Program involves four improvement projects and two new construction projects at the existing Weymouth Plant and along the off-site portion of the water treatment chemical delivery railroad tracks. Utility connections for new building structures would tie-in to the existing utilities within the Program site. The Program does not include construction of new water supply facilities or expansion of treatment capacity. Therefore, the Program would not require or result in the relocation or construction of new or expanded utility facilities. No impact would occur, and further analysis in the Draft EIR is not warranted.

b. Have sufficient water supplies available to serve the Program and reasonably foreseeable future development during normal, dry, and multiple dry years?

Less than Significant. There would be sufficient water supplies available to serve the Program. During construction, water needs for the proposed Program would be temporary and provided by the Weymouth Plant. Water would be used for dust control for open excavations or spoils. Existing water sources provided by the Weymouth Plant would be sufficient to meet those needs. The operations and maintenance activities at the Weymouth Plant would be similar to existing conditions once construction activities are completed. The Program would result in an incremental increase of approximately five to ten additional on-site employees associated with the expanded Water Quality Laboratory Building. However, the increase in on-site water demand associated

with these new employees for drinking and sanitation purposes would be minimal. Therefore, impacts to water supplies would be less than significant, and further analysis in the Draft EIR is not warranted.

c. Result in a determination by the wastewater treatment provider which serves or may serve the Program that it has adequate capacity to serve the Program's projected demand in addition to the provider's existing commitments?

Less than Significant. The proposed Program would result in a determination by the wastewater treatment provider that serves the Program that it has adequate capacity to serve the Program's projected demand in addition to the provider's existing commitments. The wastewater treatment provider for the Program site is the Los Angeles County Sanitation District. The Program would result in an incremental increase in additional on-site employees associated with the expanded Water Quality Laboratory Building, and the increase in on-site wastewater generation associated with these new employees would be minimal. In addition, the proposed Program would not increase the amount of wastewater discharged from the site beyond what is currently accepted under Los Angeles County Sanitation District Permits 9953, 21394, 21395, and 15822. As a result, impacts to wastewater treatment capacity would be less than significant, and further analysis in the Draft EIR is not warranted.

d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less than Significant. The proposed Program would not 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. Construction activities would temporarily generate solid waste, including soil spoils, demolition debris, and other construction waste that would be disposed of at the Olinda Alpha Landfill approximately 12 miles south of the Program site or at another nearby landfill. The Olinda Alpha Landfill has a maximum permitted throughput of 8,000 tons per day. In addition, as of 2020, this landfill has approximately 17.5 million cubic yards remaining of its total capacity of 148.8 million cubic yards and is expected to continue operations through 2036 (California Department of Resources Recycling and Recovery 2022). Furthermore, according to the Los Angeles County Public Works (2020) Countywide Integrated Waste Management Plan 2019 Annual Report, a shortfall in permitted landfill capacity within Los Angeles County is not anticipated to occur in the next 15 years. The Program would result in an incremental increase of approximately five to ten additional on-site employees associated with the expanded Water Quality Laboratory Building, and the increase in on-site solid waste generation associated with these new employees would be minimal. Given the relatively minor amount of construction and demolition waste that would be temporarily generated by the Program during construction and operation and the existing availability of landfill capacity at the Olinda Alpha Landfill and other nearby landfills, the Program would have low potential to 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. Impacts would be less than significant, and further analysis in the Draft EIR is not warranted.

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

No Impact. The proposed Program would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Program construction activities would temporarily generate solid waste, including soil spoils, demolition debris, and other construction waste. Program Contractor(s) would be required to comply with federal, state, and local statutes and regulations related to solid waste. Therefore, no impact would occur, and further analysis in the Draft EIR is not warranted.

3.20 Wildfire

Wildfire If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Program:	Potentially Significant Impact	Less than Significant 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 Program occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Discussion. If located in or near State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones, would the Program:

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. The proposed Program would not substantially impair an adopted emergency response plan or emergency evacuation plan. The nearest VHFHSZ or State Responsibility Area is approximately 0.9 mile north of the Program site and is separated from the Program site by intervening development, including Interstate 210 and State Route 66 (California Department of Forestry and Fire Protection 2022). As discussed in Section 3.9 (Hazards and Hazardous Materials), the proposed Program would not impair implementation or physically interfere with the City of La Verne Emergency Response Plan. Therefore, no impacts would occur, and further analysis in the Draft EIR is not warranted.

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Program occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. The proposed Program would not exacerbate wildfire risks due to slope, prevailing winds, and other factors and thereby expose Program occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. The proposed Program would not exacerbate fire risks in the area because the Program site is located in a developed area and is surrounded by urban land uses rather than wildland vegetation or steep slopes. Therefore, no impacts would occur, and further analysis in the Draft EIR is not warranted.

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. The proposed Program would not 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. Therefore, no impacts would occur, and further analysis in the Draft EIR is not warranted.

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The proposed Program would not 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. As discussed in Section 3.7 (Geology and Soils) and Section 3.10 (Hydrology and Water Quality), the Program site is not located in a landslide zone or a flood hazard zone and would result in minimal alterations to the existing drainage pattern of the Program site. Therefore, no impacts would occur, and further analysis in the Draft EIR is not warranted.

3.21 Mandatory Findings of Significance

MANDATORY FINDINGS OF SIGNIFICANCE Would the Program:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less than Significant Impact	No Impact
a) Does the Program 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 Program have impacts that are individually limited, but cumulatively considerable? (*Cumulatively considerable* means that the incremental effects of a Program 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 Program have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

Significance criteria established by CEQA Guidelines, Appendix G.

Discussion:

a. *Does the Program 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?*

Potentially Significant Impact. The proposed Program would have the potential to eliminate an important example of a major period of California history but would not 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 prehistory.

As discussed in Section 3.4 (Biological Resources), the proposed Program involves four improvement projects and two new construction projects on a site developed with a water treatment plant with little habitat value. Upon completion, the Program would result in minimal changes to existing operations and maintenance activities at the Weymouth Plant. Therefore, the proposed Program does not 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 prehistory. However, as discussed in Section 3.5 (Cultural Resources), the proposed Program would result in alterations to known historical resources in the Historic District and alterations/demolitions of potential historical

resources associated with the Administration and Control Buildings Seismic Upgrade and Building Improvements, Basin Nos. 1 and 2 Rehabilitation, and Water Treatment Chemical Delivery Railroad Tracks Replacement projects, which could result in the elimination of an important example of a major period in California history. Therefore, a Cultural Resources Technical Report will be prepared to further analyze this topic. The Program's impacts related to this issue will be detailed further in the Draft EIR, and feasible mitigation measures, as required, will be proposed.

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

Potentially Significant. The proposed Program may have impacts that are individually limited but cumulatively considerable. Potentially significant impacts associated with the proposed Program as they relate to air quality, cultural resources, GHG emissions, noise, and transportation, in combination with the effects of other past, current, and future projects in the vicinity of the Program site, may have a cumulatively considerable effect. The impacts of the proposed Program in combination with existing and currently planned and pending developments as they relate to air quality, cultural resources, GHG emissions, noise, and transportation may be cumulatively considerable, and technical studies will be prepared to further analyze these topics. The Program's impacts related to these topics will be detailed further in the Draft EIR, and feasible mitigation measures, as required, will be proposed.

c. Does the Program have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant. The proposed Program may have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly. Based on the analysis contained in this Initial Study, the proposed Program may result in substantial adverse effects on human beings related to issues such as air quality, noise, and transportation but not with regard to issues such as aesthetics, geology and soils, hazards and hazardous materials, hydrology and water quality, or public services. The Program's potential adverse effects on human beings as they relate to air quality, noise, and transportation may be potentially significant, and technical studies will be prepared to further analyze these topics. The Program's impacts related to these topics will be detailed further in the Draft EIR, and feasible mitigation measures, as required, will be proposed.

List of Preparers

4.1 The Metropolitan Water District of Southern California

Sean Carlson, Team Manager
Brenda Marines, Environmental Specialist
Jolene Ditmar, Assistant Environmental Specialist II

4.2 Rincon Consultants

Jennifer Haddow, PhD, Principal Environmental Scientist
Annaliese Miller, Senior Environmental Planner
Virginia Dussell, Environmental Planner
Ethan Knox, Environmental Planner
Josh Patterson, GIS Analyst
Yaritza Ramirez, Publishing Specialist

5. List of Acronyms/Abbreviations

ADA	Americans with Disabilities Act
AQMP	Air Quality Management Plan
APEFZ	Alquist-Priolo Earthquake Fault Zone
BMP	Best Management Practice
BNSF	Burlington Northern Santa Fe Railway Company
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
COC	chemical constituent of concern
CPUC	California Public Utilities Commission
DOC	California Department of Conservation
DTSC	California Department of Toxic Substances Control
DDW	Division of Drinking Water
EIR	Environmental Impact Report
ESL	Environmental Screening Levels
GHG	greenhouse gas
Historic District	Weymouth Water Treatment Plant Historic District
LEED	Leadership in Energy and Environmental Design
Metropolitan	The Metropolitan Water District of Southern California
NPDES	National Pollutant Discharge Elimination System
PCB	polychlorinated biphenyls
PR4.5D	Planned Residential - 4.5 units/acre
PR10A	Planned Residential - 10 units/acre attached
RWQCB	Regional Water Quality Control Board
SCAQMD	South Coast Air Quality Management District
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	California State Water Resources Control Board
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
VHFHSZ	Very High Fire Hazard Severity Zone
Weymouth Plant	F.E. Weymouth Water Treatment Plant

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