THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

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

Draft Program Environmental Impact Report

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Executive Summary

This document is a draft Program Environmental Impact Report (Draft PEIR) analyzing the potential environmental effects of The Metropolitan Water District of Southern California's (Metropolitan) proposed F.E. Weymouth Water Treatment Plant and La Verne Site Improvements Program (proposed Program). This section summarizes the characteristics of the proposed Program, the environmental impacts and mitigation measures associated with implementation of the proposed Program, and alternatives to the proposed Program considered in this Draft PEIR

Lead Agency Contact Person

Ms. Brenda Marines, Environmental Specialist
The Metropolitan Water District of Southern California
Environmental Planning Section
P.O. Box 54153
Los Angeles, California 90054-0153

Background

The F.E. Weymouth Water Treatment Plant and La Verne Site (collectively referred to herein as Weymouth Plant) was originally designed to treat water delivered by the Colorado River Aqueduct (CRA) but has had the capability to treat any blend of CRA water and State Water Project (SWP) water delivered from northern California since the 1970s. The Weymouth Plant typically operates at an annual flow of approximately 250 million gallons per day (MGD) with peak summer flows of approximately 400 MGD. The design capacity of the Weymouth Plant is 520 MGD.

Program Objectives

The overall objectives of the proposed Program are as follows:

- Upgrade aging infrastructure to ensure safe drinking water for years to come
- Install new, more-efficient treatment technologies to meet more stringent drinking water standards
- Enhance features of the Weymouth Plant to improve seismic safety and Americans with Disabilities Act (ADA) compliance and to protect public safety and the environment
- Ensure continued compliance with recent federal and State drinking water quality regulations and compliance with anticipated future regulations applicable to the Weymouth Plant
- Build new or improve existing facilities to enhance worker safety, ensure plant reliability, and facilitate efficient operations and maintenance of the Weymouth Plant

The project objectives for each component of the proposed Program are summarized below.

Water Quality Laboratory Building Improvements

- Maintain reliable operation and meet current seismic design practices and code requirements
- Improve existing laboratory spaces through building functional improvements and equipment upgrades
- Provide additional laboratory space required to carry out current and future essential water quality monitoring and research
- Achieve Leadership in Energy and Environmental Design (LEED) Gold certification, or higher

Administration and Control Buildings Seismic Upgrade and Building Improvements

- Maintain reliable operation and meet current seismic design practices and code requirements
- Retain as many character-defining features of the Administration and Control buildings as feasible while maintaining the buildings' functionality
- Increase operational efficiency by improving existing functional space through electrical upgrades and office space reconfigurations

Water Treatment Chemical Delivery Railroad Tracks Replacement

- Upgrade and maintain the water treatment chemical delivery railroad tracks to comply with Burlington Northern Santa Fe Railway Company (BNSF) requirements for safe and reliable delivery of water treatment chemical railcars
- Maintain and enhance worker and industrial safety standards

Basin Nos. 1 and 2 Rehabilitation

- Minimize the risk of future system failures and major rehabilitation work
- Update and modernize the existing basins according to current standards
- Improve operational reliability, performance, and capacity to meet current and future water processing demands

New La Verne Warehouse Facilities

- Maintain reliable operation of Metropolitan's central warehouse facility, and meet current seismic design practices and code requirements
- Protect existing assets and warehouse inventory, increase operational efficiency, and reduce expenditures by providing adequate indoor and covered outdoor storage space for the storage of critical inventory

New Field Engineering Building

- Construct a new field engineering building that meets the latest building codes and Metropolitan standards for seismic resiliency, safety, and sustainability
- Increase and maintain capability to perform laboratory analysis (e.g., soils, concrete, corrosion, material, and coatings testing) that supports Metropolitan construction standards
- Achieve LEED Silver certification, or higher

Program Description

The proposed Program consists of six total projects, each of which is described briefly in the following subsections.

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.

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 Existing Buildings), enhancing building functionality (such as reconfiguring office spaces and conference rooms), adding ADA-accessible restrooms and showers, and re-locating the breakroom. The project also includes architectural, mechanical, electrical, and plumbing improvements required by code. Light-Emitting Diode (LED) lighting would be placed in certain portions of the building, and a new electric domestic water heating system to serve the new fourth floor restrooms would be installed.

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) used to deliver water treatment chemicals to the Weymouth Plant. The existing tracks would be removed, and replacement tracks would be installed in the same footprint. New load-cells would be installed in existing storage and unloading bays. In addition, improvements to the existing trail/accessway in the Metropolitan-owned parcel between 3rd Street and Palomares Avenue would be completed.

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, drive assemblage, hand rails, utilities, and mechanical and electrical equipment (i.e., light poles, control panels, lighting panels, junction boxes, conduits). Additionally, seismic upgrades to influent channels that extend into Basin Nos. 3 and 4, and structural modifications and concrete reinforcement of basin walls would be completed. 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.

[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.

New La Verne Warehouse Facilities

The New La Verne Warehouse Facilities project involves the demolition of the existing Central Stores Warehouse Building 30 and Annex Building 31 and construction of a new reinforced concrete tilt-up warehouse and a new loading dock to be utilized for the storage, procurement, and receiving of valves, pipes, materials, supplies, and equipment related to Metropolitan operations. 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 large diameter valves, metal plates, and equipment related to Metropolitan operations. The project would also include upgrading Storage Buildings 32 and 32A as well as Investment Recovery 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.

New Field Engineering Building

The New Field Engineering Building project consists of the construction of a new building within the Weymouth Plant. The existing engineering building would be repurposed for non-occupancy use. The new field engineering building would be approximately 40,000 square feet and would include conference rooms and offices, lunchroom, ADA-accessible restrooms, and testing laboratories (e.g., soils, concrete, corrosion, materials and coatings testing).

Analysis of Alternatives

This Draft PEIR examines alternatives to the proposed Program in Chapter 5, Alternatives. CEQA Guidelines Section 15126.6(a) states an EIR shall describe "a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project," as well as provide an evaluation of "the comparative merits of the alternatives." Pursuant to CEQA Guidelines Section 15126.6(a), an EIR does not need to consider alternatives that are not feasible, nor need it address every conceivable alternative to the project. As discussed in greater detail in Chapter 5, Alternatives, several alternatives were considered but rejected, including reduced project footprints, removal of certain projects from the proposed Program, and an alternative location for the New La Verne Warehouse Facilities, because these alternatives would not be feasible, accomplish the basic objectives of the proposed Program, or substantially lessen environmental effects. This Draft PEIR considers two alternatives to the proposed Program, the No Project Alternative and the Modified Construction Parameters Alternative, to determine whether environmental impacts would be similar to, less than, or greater than those of the proposed Program.

The Draft PEIR concludes the No Program Alternative is the environmentally superior alternative to the proposed Program because it would avoid the proposed Program's significant and unavoidable impact related to construction noise and would result in generally similar or reduced impacts to other environmental resources. However, the environmentally superior alternative would not meet any of the Program or project-specific objectives. In addition, if the No Program alternative is the environmentally superior alternative, CEQA requires identification of an environmentally superior alternative among the remaining alternatives (CEQA Guidelines Section 15126.6[e]). As a result, between the proposed Program and the Modified Construction Parameters alternative, the Modified Construction Parameters alternative would be considered the environmentally superior alternative because it would result in similar or fewer impacts to most environmental resources as compared to

the proposed Program and would reduce the severity of the significant and unavoidable construction noise impact, although not to a level of less-than-significant.

Areas of Controversy

CEQA Guidelines Section 15123(b)(2) requires an EIR identify areas of controversy known to the lead agency, including issues raised by other agencies and the public. No known areas of controversy are associated with the proposed Program.

Issues to Be Resolved

CEQA Guidelines Section 15123(b)(3) requires an EIR contain a discussion of issues to be resolved, including the choice among alternatives and whether or how to mitigate significant effects. There are currently no issues to be resolved for the proposed Program.

Summary of Impacts and Mitigation Measures

Table 1 presents a summary of the identified environmental impacts associated with each threshold analyzed in detail in the Draft PEIR, proposed mitigation measures, and the level of significance after mitigation. The complete impact statements and mitigation measures are presented in Chapter 3, *Environmental Impact Analysis*. The level of significance for each impact was determined using thresholds of significance developed for each category of impacts; these criteria are presented in the appropriate sections in Chapter 3. Significant impacts are those adverse environmental impacts that meet or exceed the significance thresholds; less-than-significant impacts would not exceed the thresholds.

This document is a PEIR. CEQA Guidelines Section 15168(a) states that:

> A Program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either: (1) geographically; (2) as logical parts in a chain of contemplated actions; (3) in connection with issuance of rules, regulations, plans, or other general criteria, to govern the conduct of a continuing program; or (4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

As summarized in Table 1, the Draft PEIR identifies one significant and unavoidable impact in the resource category of noise. The significant and unavoidable impact identified in this Draft PEIR is the result of the potential for construction activities to generate a temporary increase in ambient noise levels in excess of the City of La Verne's daytime and nighttime noise standards. All other potentially significant impacts identified would be reduced to less-than-significant levels with the implementation of mitigation measures.

Table 1 Summary of Environmental Impacts, Mitigation Measures and Impacts After Mitigation

Impact	Mitigation Measure(s)	Significance After Mitigation
Air Quality		
Impact AQ-A. Implementation of the proposed Program would potentially conflict with or obstruct implementation of the applicable air quality plan due to construction emissions. This impact would be potentially significant.	**MM AQ-1 Use of Low-VOC Architectural Coatings** During the architectural coating phases of the Water Quality Laboratory Building Improvements, Administration and Control Buildings Seismic Upgrades and Building Improvements, New La Verne Warehouse Facilities, and New Field Engineering Building projects, the Construction Contractor(s) shall use "super-compliant" low volatile organic compound (VOC) paints that have been reformulated to exceed the regulatory VOC limits put forth by South Coast Air Quality Management District's Rule 1113. Super-compliant low VOC paints shall have a VOC content no greater than 55 grams per liter.	Less than Significant
Impact AQ-B. Program construction activities would generate criteria air pollutant emissions in excess of established thresholds. This impact would be potentially significant.	MM AQ-1	Less than Significant
Impact AQ-C. Construction and operation of the proposed Program would not expose sensitive receptors to substantial pollutant concentrations. This impact would be less than significant.	This impact would be less than significant. No mitigation is required.	Less than Significant
Cultural Resources		
Impact CUL-A. Implementation of the proposed Program would have the potential to cause a substantial adverse change in the significance of a historical resource. This impact would be potentially significant.	**MM CUL-1(a) Consultation with Historical Architect** During the design and construction phases of the Administration and Control Buildings Seismic Upgrade and Building Improvements Project and the Basin Nos. 1 and 2 Rehabilitation project, Metropolitan shall secure the services of a historical architect meeting the Secretary of the Interior's professional qualifications standards for historic architecture (36 Code of Federal Regulations Part 61) for consultation. The historical architect shall review design plans for both projects at key points during the design and construction phases and shall make recommendations to retain as many character-defining features, as practicable, and achieve project compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties. The recommendations of the historical architect shall be integrated into project design and implemented to the greatest extent feasible. **MM CUL-1(b) Documentation** Prior to the start of construction activities for the Administration and Control Buildings Seismic Upgrade and Building Improvements project and the Basin Nos. 1 and 2 Rehabilitation project, Metropolitan shall document the Administration and Control buildings and Basin Nos. 1 and 2 in accordance with documentation standards outlined in the *Cultural Resource Treatment Plan for the Weymouth Water Treatment Plant Historic District* (2016).	Less than Significant

Impact	Mitigation Measure(s)	Significance After Mitigation
Impact CUL-B. Implementation of the proposed Program would not cause a substantial adverse change in the significance of an archaeological resource. This impact would be less than significant.	This impact would be less than significant. No mitigation is required.	Less than Significant
Greenhouse Gas Emissions		
Impact GHG-A. Implementation of the proposed Program would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. This impact would be less than significant.	This impact would be less than significant. No mitigation is required.	Less than Significant
Impact GHG-B. Implementation of the proposed Program would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. No impact would occur.	No impact would occur. No mitigation is required.	No Impact
Noise		
Impact NOI-A. Construction activities associated with implementation of the proposed Program may result in generation of a substantial temporary increase in ambient noise levels. This impact would be potentially significant.	**MM NOI-1 Temporary Construction Noise Barriers** During all construction activities within 500 feet of sensitive receptors, temporary noise barriers that are of sufficient height to block the line of sight between the equipment and the sensitive receiver(s) shall be erected along the perimeter(s) of the active construction area that face the sensitives receiver(s). The temporary barriers shall have a minimum Sound Transmission Class rating of 21 and noise reduction coefficient of 0.75. Additionally, the temporary barriers shall be a minimum of 10 feet in height or of sufficient height to intercept the line of sight between the noise-generating source of the construction equipment (i.e., the exhaust) and nearby residential receivers, whichever is greater.	Significant and Unavoidable
Impact NOI-B. Implementation of the proposed Program would not result in the generation of excessive groundborne vibration or groundborne noise levels, depending on the nature and location of such projects. This impact would be less than significant.	This impact would be less than significant. No mitigation is required.	Less than Significant

Impact	Mitigation Measure(s)	Significance After Mitigation
Transportation		
Impact TRA-A. Construction activities associated with implementation of the proposed Program would conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. This impact would be potentially significant.	**MM TRA-1 Traffic Management Plan** Prior to the start of construction of the Water Treatment Chemical Delivery Railroad Tracks Replacement project, a Traffic Management Plan (TMP) shall be prepared to minimize the disruption to traffic during construction and to guide vehicles to the preferred detour routes. The TMP shall be updated, as needed, to address congestion at or near the construction site. The TMP shall include a Public Awareness Campaign, Motorist Information Strategies, Incident Management, and Contingency Plans. In addition, the TMP shall include the following specific information: • Placement of temporary street closure warning signage along Wheeler Avenue, Bonita Avenue, and other streets, as needed, to warn drivers of upcoming construction activities • Placement of detour signs to redirect vehicle traffic • Identification of construction staging locations and intersection closures, alternate routes for vehicle detours, and planned truck routes for construction-related vehicle traffic • Identification of alternative safe routes to maintain safety along bicycle and pedestrian routes during construction • Description of traffic control measures (i.e., flag persons, warning signs, lights, barricades, cones, detour routes) to provide safe passage for vehicular, bicycle, and pedestrian traffic In addition, Metropolitan shall provide notice to impacted residents and interested parties (i.e., City of La Verne, Los Angeles County Parks and Recreation, Foothill Transit, and local schools such as Grace Miller Elementary School, Damien High School, and the Joan Macy School) regarding intersection closures.	Less than Significant
Impact TRA-B. Implementation of the proposed Program would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). This impact would be less than significant.	This impact would be less than significant. No mitigation is required.	Less than Significant
Impact TRA-C. Construction activities associated with implementation of the proposed Program would substantially increase traffic hazards. This impact would be potentially significant.	**MM TRA-1**	Less than Significant
Tribal Cultural Resources		
Impact TCR-A. Implementation of the proposed Program would not cause a substantial adverse change in the significance of a tribal cultural resource. This impact would be less than significant.	This impact would be less than significant. No mitigation is required.	Less than Significant

1 Introduction

1.1 Overview of the Proposed Program

The Metropolitan Water District of Southern California (Metropolitan) is proposing the F.E. Weymouth Water Treatment Plant and La Verne Site Improvements Program (proposed Program), which includes four improvement projects and two new construction projects at the F.E. Weymouth Water Treatment Plant and La Verne Site (collectively referred to herein as Weymouth Plant). The proposed Program is intended to accomplish necessary upgrades, improvements, and enhancements at the Weymouth Plant to ensure safe drinking water and plant reliability, improve seismic safety and Americans with Disabilities Act (ADA) compliance, protect worker and public safety, ensure continued compliance with recent federal and State drinking water quality regulations and compliance with anticipated future regulations, and facilitate efficient operations and maintenance.

1.2 Purpose of the Program Environmental Impact Report

This Draft PEIR, which assesses the potential environmental effects of the proposed Program, has been prepared in accordance with the California Environmental Quality Act (CEQA) of 1970 (Public Resources Code [PRC] Section 21000 et seq.) and the Guidelines for Implementation of CEQA (CEQA Guidelines) published by the Public Resources Agency of the State of California (California Code of Regulations, Title 14, Section 15000 et seq.). Metropolitan is the lead agency under CEQA (PRC Section 21067, as amended), is responsible for the preparation of the Draft PEIR, and will use this document to objectively review and assess the proposed Program prior to approval or disapproval of the proposed Program and subsequently each individual project.

An EIR is intended to: (1) inform decision-makers and the public about the potentially significant environmental effects of the proposed activities; (2) identify the ways that significant environmental effects can be avoided or reduced; and (3) prevent significant, avoidable damage to the environment by requiring changes in the proposed Program through the use of alternatives or mitigation measures, to the extent that Metropolitan determines the changes to be feasible (CEQA Guidelines Section 15002; PRC Section 21002.1). Furthermore, a PEIR can be prepared for a series of actions that can be characterized as one large project and are related either geographically, as logical parts in contemplated actions, or in the connection with issuance of rules, regulations, plans of other general criteria to govern the conduct of a continuing program (CEQA Guidelines Section 15168).

1.3 Scope of the Program Environmental Impact Report

This Draft PEIR focuses on impacts identified to be potentially significant during preparation of the Initial Study (Appendix A). The following environmental resource areas were found to include potentially significant impacts and have been studied in-depth in this Draft PEIR:

- Air Quality
- Cultural Resources
- Greenhouse Gas Emissions
- Noise
- Transportation
- Tribal Cultural Resources

Pursuant to CEQA Guidelines Section 15128, an EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. Section 15128 notes such a statement may be contained in an attached copy of an Initial Study. The Initial Study (Appendix A) concludes there is no substantial evidence the proposed Program would have significant impacts on the following resource areas; as such, these resource areas are not discussed further within this Draft PEIR:

- Aesthetics
- Agriculture and Forestry Resources
- Biological Resources
- Energy
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Utilities and Service Systems
- Wildfire

Additionally, this Draft PEIR describes Native American tribal outreach efforts conducted by Metropolitan pursuant to the requirements of PRC 21080.3.1 in Section 3.6, *Tribal Cultural Resources*.

1.4 Format of the Program Environmental Impact Report

This Draft PEIR is organized as follows:

- ***Executive Summary***. The summary includes a brief description of the proposed Program, a summary of environmental impacts, a list of proposed mitigation measures that would reduce or avoid impacts, discussion of alternatives considered, description of areas of controversy known to the lead agency, and any issues to be resolved.
- **Chapter 1, *Introduction***. This chapter introduces the proposed Program and describes the scope and purpose of the Draft PEIR, provides a brief summary of the CEQA process, and establishes the document format.
- **Chapter 2, *Program Description***. This chapter provides background information on Metropolitan, a discussion of the need and the objectives of the proposed Program, and detail on the construction and operational characteristics of the proposed Program.

- **Chapter 3, *Environmental Impact Analysis***. This chapter constitutes the main body of the Draft EIR and includes the detailed impact analysis for each environmental resource area listed in Section 1.3, *Scope of the Program Environmental Impact Report*. Sections 3.1 to 3.6 include a discussion of methods of analysis, existing conditions, the thresholds identified for the determination of significant impacts, and an evaluation of the impacts associated with the proposed Program for each resource area. Where the impact analysis demonstrates the potential for the proposed Program to have a significant impact on the environment, mitigation measures are provided that would minimize the significant effects to the extent feasible. The Draft PEIR indicates if the proposed mitigation measures would reduce impacts to less-than-significant levels. The cumulative impacts that would result from implementation of the proposed Program in combination with other past, present, and reasonably foreseeable or probable future projects are discussed in each resource section.
- **Chapter 4, *Other Required CEQA Discussion*.** This chapter discusses additional topics required by CEQA, including growth inducement and irreversible environmental changes.
- **Chapter 5, *Alternatives***. This chapter provides a description of alternatives to the proposed Program and an evaluation of their potential to reduce or avoid the proposed Program's significant impacts.
- **Chapter 6, *References and Preparers***. This chapter contains references for all citations included in the Draft PEIR as well as a list of preparers and contributors.

1.5 Notice of Preparation

Pursuant to CEQA Guidelines Section 15082, a Notice of Preparation (NOP) of a Draft PEIR was prepared and circulated, along with an Initial Study, to interested agencies, organizations, and individuals to afford them an opportunity to respond with specific comments and/or questions regarding the scope and content of the Draft PEIR. The public review period occurred between December 8, 2022 and January 23, 2023. The NOP and Initial Study were also sent to the State Clearinghouse (SCH) at the California Governor's Office of Planning and Research. The SCH number assigned to this Draft PEIR is SCH No. 2022120175. Pursuant to CEQA Guidelines Section 15082, recipients of the NOP for the proposed Program were requested to provide responses within 47 days of publication of the NOP. Pursuant to CEQA Guidelines Section 15082(b)(2), a lead agency may presume responsible and trustee agencies who do not submit comments within 30 days of the release of an NOP have no responses to be considered; however, Metropolitan extended the review period from the required 30 days to 47 days to provide responsible and trustee agencies as well as the public with extended time to review and respond to the NOP and Initial Study due to the holiday period.

All comments received during the public review period were considered during the preparation of this Draft PEIR. Metropolitan received letters from four agencies and one member of the public in response to the NOP. These commenters include the following:

- California Department of Transportation
- Native American Heritage Commission
- Los Angeles County Sanitation District
- South Coast Air Quality Management District
- Resident: Jennifer Legaspi

Written comments pertaining to the environmental impacts of the proposed Program are addressed in the analysis contained in the various subsections of Chapter 3, *Environmental Impact Analysis*. The

economic or social effects of the proposed Program are not examined herein because, pursuant to CEQA Guidelines Section 15131(a), economic or social effects of a project shall not be treated as significant effects on the environment; rather, the focus of the analysis shall be on the physical changes. Therefore, any comments pertaining to economic or social effects of the proposed Program are not addressed in this Draft PEIR. The NOP and Initial Study are presented in Appendix A of this Draft PEIR, along with the comments received on the NOP.

1.6 Availability of a Draft Program Environmental Impact Report

This Draft PEIR will be distributed to various federal, state, regional, county, and city agencies as well as interested parties for a 45-day public review period, which begins on September 18, 2023 and ends on November 2, 2023 in accordance with CEQA Guidelines Section 15087. In addition, this Draft PEIR, including supporting technical documentation, is available for review by the general public by appointment during normal operating hours at Metropolitan's offices at 700 North Alameda Street, Los Angeles, California. The document is also available on Metropolitan's website at the following address: http://www.mwdh2o.com/CEQA or at the La Verne and San Dimas public libraries during normal business hours.

Agencies and other interested parties may provide written comments on the Draft PEIR before the end of the 45-day public review and comment period. Written comments should be submitted as follows:

Ms. Brenda Marines
Environmental Specialist
The Metropolitan Water District of Southern California
Environmental Planning Section
P.O. Box 54153
Los Angeles, California 90054-0153

Comments may also be emailed to EP@mwdh2o.com (reference "Weymouth PEIR" in the subject line). Written comments should include the name, mailing address, telephone number, and email address, if available, of a contact person. In addition, Metropolitan will host a public meeting on October 4, 2023 at 6:00 p.m. at La Verne City Hall, located at 3660 D Street, La Verne, California 91750.

Following the 45-day public review and comment period for the Draft PEIR, Metropolitan will prepare a written response for each written comment received on the Draft PEIR. The written comments and responses to those comments, as well as PEIR changes, if any, will be incorporated into a Final PEIR. Pursuant to Section 15092 of the CEQA Guidelines, Metropolitan's Board of Directors will consider the following actions: certify the Final PEIR; adopt the Findings of the Fact, Statement of Overriding Considerations, and Mitigation Monitoring and Reporting Program (MMRP); and approve the proposed Program.

2 Program Description

Metropolitan, the lead agency under CEQA, is proposing the F.E. Weymouth Water Treatment Plant and La Verne Site Improvements Program to implement four improvement projects and two new construction projects at the Weymouth Plant. This chapter describes the proposed Program's need and objectives, individual projects included in the proposed Program, and the Program site. This chapter also provides a detailed summary of the anticipated construction and operational characteristics of each project and the anticipated permits and approvals required to implement the proposed Program.

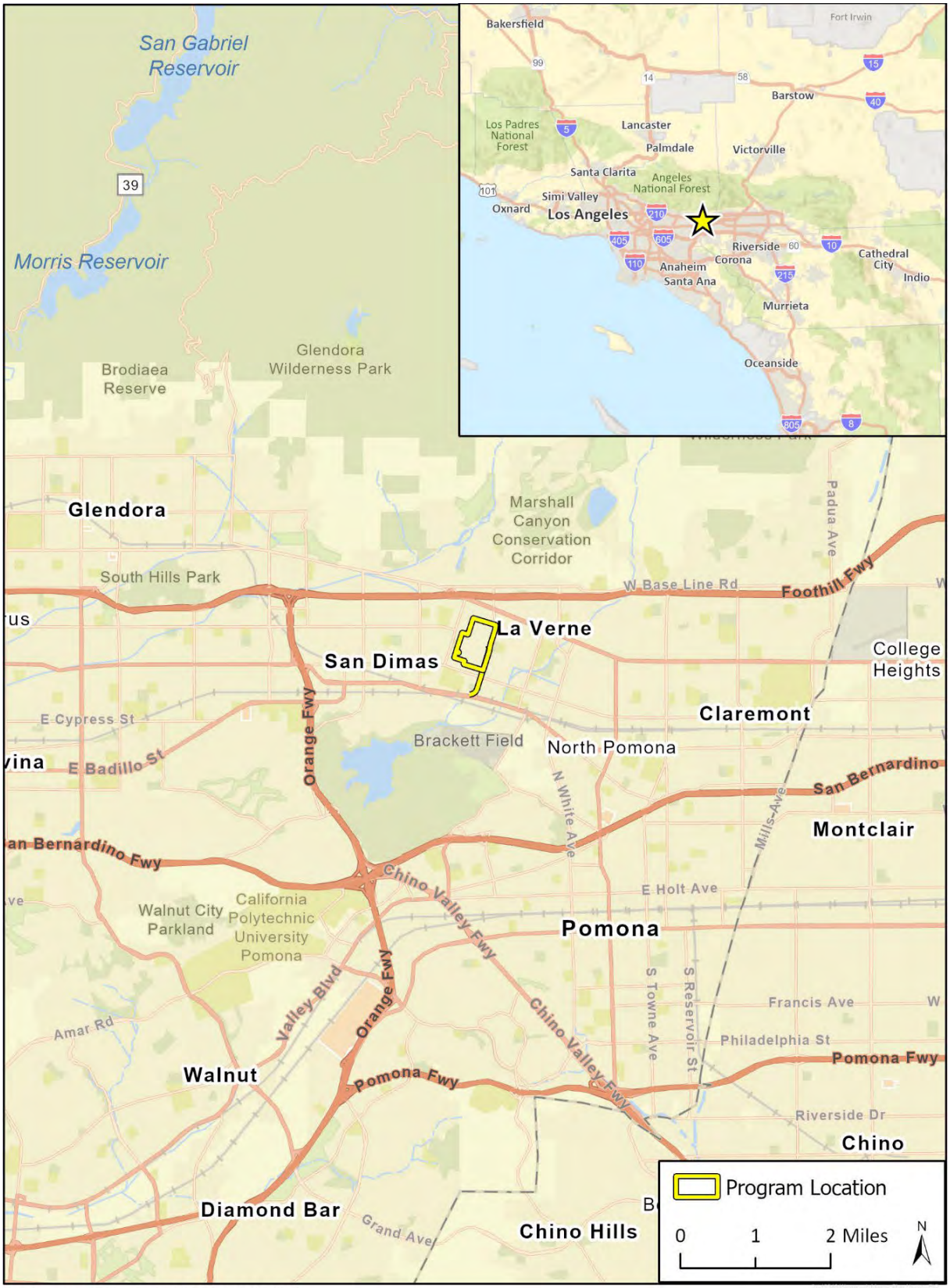
2.1 Introduction

Metropolitan is a regional wholesaler that provides water for 26 member agencies to deliver either directly or through their sub-agencies to nearly 19 million people across a 5,200-square mile service area in six counties (Los Angeles, Orange, Riverside, San Bernardino, San Diego, and Ventura) in Southern California. On average, Metropolitan conveys approximately 1.5 billion gallons of water daily throughout its distribution system (Metropolitan 2022a). Metropolitan imports water from the SWP and from the Colorado River via the CRA. In addition to imported water, Metropolitan invests in local resource development along with its member agencies and utilizes groundwater banking and transfer programs. Metropolitan also manages water demands by promoting and investing in conservation and water use efficiency projects. Water supplies are conveyed through Metropolitan's extensive distribution system, which includes five water treatment plants, 15 hydroelectric facilities, approximately 830 miles of large-diameter pipelines and tunnels, and approximately 400 service connections (Metropolitan 2022b).

2.2 Program Location

The proposed Program is located at the Weymouth Plant at 700 Moreno Avenue in La Verne, California. The 135-acre Weymouth Plant is owned by 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 the connection with the BNSF network. Figure 1 shows the site of the proposed Program in a regional and local context.

Figure 1 Program Site Vicinity



2.3 Program Need and Objectives

This Draft PEIR analyzes potential environmental impacts associated with implementation of the proposed Program. Pursuant to CEQA Guidelines Section 15124(b), an EIR shall contain a statement of objectives sought by the proposed Program. The overall objectives of the proposed Program include the following:

- Upgrade aging infrastructure to ensure safe drinking water for years to come
- Install new, more-efficient treatment technologies to meet more stringent drinking water standards
- Enhance features of the Weymouth Plant to improve seismic safety and ADA compliance and to protect public safety and the environment
- Ensure continued compliance with recent federal and state drinking water quality regulations and compliance with anticipated future regulations applicable to the Weymouth Plant
- Build new or improve existing facilities to enhance worker safety, ensure plant reliability, and facilitate efficient operations and maintenance of the Weymouth Plant

The need and objectives for each project included in the proposed Program are summarized below.

Water Quality Laboratory Building Improvements

The Water Quality Laboratory provides space for laboratory compliance monitoring and testing; general water quality monitoring; maintenance of distribution system integrity; and applied research. The latest improvements to the Water Quality Laboratory were completed in 1998. Currently, spaces within the Water Quality Laboratory are fully utilized or beyond capacity, and the building itself is vulnerable to seismic events. The Water Quality Laboratory Building Improvements project consists of retrofitting and expanding the existing Water Quality Laboratory Building to resolve these issues.

The objectives of this project are as follows:

- Maintain reliable operation and meet current seismic design practices and code requirements
- Improve existing laboratory spaces through building functional improvements and equipment upgrades
- Provide additional laboratory space required to carry out current and future essential water quality monitoring and research
- Achieve Leadership in Energy and Environmental Design (LEED) Gold certification, or higher

Administration and Control Buildings Seismic Upgrade and Building Improvements

The Administration and Control buildings were constructed in 1941. The Administration Building is an approximately 15,200-square-foot, two-story reinforced concrete building, and the Control Building is an approximately 20,000-square-foot, four-story reinforced concrete building that adjoins the Administration Building. In 2006, a structural integrity study of the Administration and Control buildings identified structural deficiencies that could result in damage to both buildings during a seismic event. Structural damage could cause harm to workers and the buildings themselves, which are eligible for designation in the National Register of Historic Places (NRHP) and the California Register of Historic Resources (CRHR) (Strategic Value Solutions, Inc. [SVS] 2022). As a result, the Administration and Control Buildings Seismic Upgrade and Building Improvements project consists

of structurally strengthening and retrofitting the existing main lateral resisting system, enhancing building functionality, and completing improvements to meet ADA and other code compliance requirements.

The objectives of this project are as follows:

- Maintain reliable operation and meet current seismic design practices and code requirements
- Retain as many character-defining features of the Administration and Control buildings as feasible while maintaining the buildings' functionality
- Increase operational efficiency by improving existing functional space through electrical upgrades and office space reconfigurations

Water Treatment Chemical Delivery Railroad Tracks Replacement

The existing railroad tracks located at the Weymouth Plant and off-site parallel to Wheeler Avenue between the Weymouth Plant and Arrow Highway require replacement in order to comply with safety and reliability standards.

The objectives of this project are as follows:

- Upgrade and maintain the water treatment chemical delivery railroad tracks to comply with BNSF requirements for safe and reliable delivery of water treatment chemical railcars
- Maintain and enhance worker and industrial safety standards

Basin Nos. 1 and 2 Rehabilitation

The existing Basin Nos. 1 and 2 require maintenance and repair to maintain and improve currently deteriorated components, thereby enhancing the Weymouth Plant's reliability.

The objectives of this project are as follows:

- Minimize the risk of future system failures and major rehabilitation work
- Update and modernize the existing basins according to current standards
- Improve operational reliability, performance, and capacity to meet current and future water processing demands

New La Verne Warehouse Facilities

Current indoor warehouse capacity constraints for Metropolitan's Central Storage Warehouse, located at the La Verne Facility, require critical Metropolitan inventory to be stored outdoors. Exposure to the outdoor environment contributes to material corrosion and the need to refurbish damaged inventory. In addition, existing storage facilities (Buildings 32, 32A, and 33) are not compliant with current seismic code requirements. The New La Verne Warehouse Facilities project aims to increase the amount of available storage space at the Weymouth Plant to meet existing and future storage needs for Metropolitan and address current seismic code requirements and safety standards.

The objectives of this project are as follows:

- Maintain reliable operation of Metropolitan's central warehouse facility, and meet current seismic design practices and code requirements
- Protect existing assets and warehouse inventory, increase operational efficiency, and reduce expenditures by providing adequate indoor and covered outdoor storage space for the storage of critical inventory

New Field Engineering Building

The existing Field Engineering Building at the Weymouth Plant is vulnerable to damage from seismic events. The New Field Engineering Building project would construct a new field engineering building in compliance with California Building Code (CBC) standards and regulations. The existing engineering building would be repurposed for non-occupancy use.

The objectives of this project are as follows:

- Construct a new field engineering building that meets the latest building codes and Metropolitan standards for seismic resiliency, safety, and sustainability
- Increase and maintain capability to perform laboratory analysis (e.g., soils, concrete, corrosion, material, and coatings testing) that supports Metropolitan construction standards
- Achieve LEED Silver certification, or higher

2.4 Background

The Weymouth Plant was originally designed to treat water delivered by the CRA but has had the capability to treat any blend of CRA water and SWP water since the 1970s. The Weymouth Plant typically operates at an annual flow of approximately 250 million gallons per day (MGD) with peak summer flows of approximately 400 MGD. The design capacity of the Weymouth Plant is 520 MGD.

Existing water treatment at the Weymouth Plant consists of filtration and disinfection with ozone as a primary disinfectant and chlorine as a back-up disinfectant. Untreated water is conveyed to the Weymouth Plant via the La Verne Pipeline (SWP water) and the Upper Feeder East (CRA water) and blended at the on-site Junction Structure. The water undergoes the following treatment stages (Metropolitan 2022c):

- **Disinfection**. Disinfection is primarily achieved using ozone. Ozone destroys a wider range of microorganisms than chlorine, including pathogens such as viruses and protozoa such as *Cryptosporidium* and Giardia. As water flows through ozone contactors, hydrogen peroxide is occasionally added for taste and odor control. If interruptions in the ozone process occur, chlorine is used as a back-up disinfectant. Chlorine is injected during the final process to provide a chlorine residual for water quality compliance.
- **Coagulation.** Chemicals (aluminum sulfate/ferric chloride and polymers) are rapidly mixed into the water to facilitate coagulation. Coagulation is a process of clumping together fine particles (such as clays and silts, natural organic matter, and microorganisms).
- **Flocculation.** Water is stirred slowly in the mixing basins to facilitate the gathering of particles to form larger masses described as floc.
- **Sedimentation.** Water is conveyed to the settling basins, where the heavier floc is settled out of the water by gravity.
- **Filtration.** Water is passed through layers of various media (i.e., gravel, sand, coal) to filter smaller particles that did not settle out during the sedimentation process.

For secondary disinfection, chlorine and ammonia are added to the filtered water to form chloramines, which help to prevent regrowth of microorganisms as water is conveyed through the distribution system. The treated water is sent to a Finished Water Reservoir prior to its distribution into several pipelines/feeders (Upper, Middle, and Orange County) from which Metropolitan delivers water to its member agencies.

To maintain their effectiveness, the filters are cleaned periodically by backwashing (a process consisting of passing water through the filters in the reverse direction) and dislodging the filtered particles. The wastewater resulting from this process (filter backwash) is treated at the Wash Water Reclamation Plant within the Weymouth Plant using a process similar to the main treatment process described above. In addition to filter backwash, the Wash Water Reclamation Plant also treats the settled materials from the filtration solids thickeners. The treated wash water is conveyed from the Wash Water Reclamation Plant to the head of the main plant where it is mixed with the untreated water.

2.5 Description of Proposed Program

The proposed Program consists of six total projects, each of which is described briefly in the following subsections. The location of each project is shown in Figure 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 LEED Gold certification, and sustainability features may include energy-efficient appliances and lighting, double-glazed windows, water-efficient toilets and sinks, and drought-tolerant landscaping.

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[2] to meet American Society of Civil Engineers Standard 41-13 (Seismic Evaluation and Retrofit of Existing Buildings), enhancing building functionality (such as reconfiguring office spaces and conference rooms), adding ADA-accessible restrooms and showers, and re-locating the breakroom. The project also includes architectural, mechanical, electrical, and plumbing improvements required by code. Light-Emitting Diode (LED) lighting would be placed in certain portions of the building, and a new electric domestic water heating system to serve the new fourth floor restrooms would be installed.

[2] 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.

Figure 2 Proposed Projects

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) used to deliver water treatment 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 water treatment chemical railcars. New load-cells[3] would be installed in existing storage and unloading bays.

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, drive assemblage, hand rails, utilities, and mechanical and electrical equipment (i.e., light poles, control panels, lighting panels, junction boxes, conduits). Additionally, seismic upgrades to influent channels that extend into Basin Nos. 3 and 4, and structural modifications and concrete reinforcement of basin walls would be completed. 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.

New La Verne Warehouse Facilities

The New La Verne Warehouse Facilities project involves the demolition of existing Central Stores Warehouse Building 30 and Annex Building 31 and construction of a new reinforced concrete tilt-up warehouse and a new loading dock to be utilized for the storage, procurement, and receiving of valves, pipes, materials, supplies, and equipment related to Metropolitan operations. 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. Sustainability features may include LED lighting, low-flow toilets, and low-emittance windows. The outdoor canopy storage space would be utilized for large diameter valves, metal plates, and equipment related to Metropolitan operations. The project would also include upgrading Storage Buildings 32 and 32A as well as Investment Recovery 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.

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 would be repurposed for non-occupancy use. The new field engineering building would be approximately 40,000 square feet and would include conference rooms and offices, lunchroom, ADA-accessible restrooms, and testing laboratories (e.g., soils, concrete, corrosion, materials, and coatings testing). The new field engineering building would be designed and constructed to achieve LEED Silver certification. Sustainability features may include drought-tolerant landscaping, water-efficient fixtures, energy-efficient lighting, and double-glazed windows.

[3] A load cell is a device designed to measure and monitor the weight exerted by a railcar at a specific part of a railroad track.

Greenhouse Gas Reduction Measures

The proposed Program would incorporate Metropolitan's Climate Action Plan (CAP) Measure DC-2 by installing all-electric equipment to the extent feasible for the Water Quality Laboratory Building Improvements project, New Field Engineering Building project, and New La Verne Warehouse Facilities project. Limited natural-gas-powered equipment may be utilized if procurement of electrically-powered technologies and equipment for certain processes and systems is not feasible. The proposed Program would also incorporate CAP Measure EE-1 by utilizing interior and exterior LED lighting for the Water Quality Laboratory Building Improvements project, New Field Engineering Building project, New La Verne Warehouse Facilities project, and any new or retrofitted lighting installed as part of the Administration and Control Buildings Seismic Upgrade and Building Improvements project.

2.6 Construction Characteristics

Program construction would involve demolition and removal of existing facilities, site grading and excavation to prepare for new facilities, construction and rehabilitation of structures including structural improvements, railroad track replacement, piping, finish work, equipment installation, paving, and landscaping.

Construction is expected to occur over the course of approximately five years between 2024 and 2029, primarily within the boundaries of the Weymouth Plant with the exception of the Water Treatment Chemical Delivery Railroad Tracks Replacement project. Most of the individual projects are currently in design phase and construction timelines would be staggered over a five-year period. Construction activities would primarily occur Monday through Friday between the hours of 7:00 a.m. and 8:00 p.m., which is within the City of La Verne's (City) permitted hours for Noise Construction Activity of 7:00 a.m. to 8:00 p.m. Nighttime construction work may be required to achieve an expedited construction schedule for the Water Treatment Chemical Delivery Railroad Tracks project and for incidental interior construction activities for other projects included in the proposed Program, in which case Metropolitan would obtain a noise variance from the City. It is anticipated project construction would not require the entire Weymouth Plant to be shut down for any period of time. Localized shutdowns would be required and would occur during construction of the Basin Nos. 1 and 2 Rehabilitation project and the Administration and Control Buildings Seismic Upgrade and Building Improvements project. These specific facilities would experience a temporary interruption in service that would not impact normal plant operations.

Construction staging and parking would primarily occur at existing staging areas located within the Weymouth Plant. The proposed construction haul route for demolition and soil export as well as material delivery would use the Wheeler Avenue gate entrance/exit that is located on the east side of the plant, generally located across from Pelota Park between Paseo Avenue and Holly Oak Street. Trucks would travel north on Wheeler Avenue to Foothill Boulevard and merge onto State Route (SR) 210 or south on Wheeler Avenue to Arrow Highway and merge onto SR 57. The streets and highways included in the proposed haul routes are under the City's jurisdiction for local streets and the California Department of Transportation's (Caltrans) jurisdiction for highways. Construction traffic on residential streets would generally be avoided with the exception of the Water Treatment Chemical Delivery Railroad Tracks Replacement Project. Demolition debris and exported soil material would be hauled to nearby landfills. For the Administration and Control Buildings Seismic Upgrade and Building Improvements project, New Field Engineering Building project, and New La Verne Warehouse Facilities project, small volumes of concrete would be manufactured on site, and large concrete volume requirements would be ordered from a concrete batch plant approximately eight miles west of the Weymouth Plant.

Environmental Requirements for Construction

Metropolitan has established standardized environmental protocols and requirements for contractors and Metropolitan staff engaging in construction activities. These requirements are intended to ensure best practices are in place during all construction phases and to reduce and/or avoid environmental impacts. In addition, Metropolitan's engineering project specification package also includes design practices for contractors during construction to reduce or avoid impacts to the environment.

Relevant construction requirements are summarized below:

- Obtain and comply with the applicable local, state, and federal environmental permits.
- Comply with the Federal Migratory Bird Treaty Act and California Fish and Game Code Section 3503, including conducting pre-construction nesting bird surveys and implementation of avoidance measures, where applicable.
- Prepare, submit, and comply with the surface and storm water control measures in compliance with the Water Pollution Control Program (WPCP) or Stormwater Pollution Prevention Plan (SWPPP) for individual projects greater than one acre.
- Prepare and comply with the Traffic Control Plan for projects located within residential streets.
- Perform all work without undue noise and make every effort to abate or prevent noise nuisances.
- Maintain all construction vehicle equipment in proper working order for the duration of the construction activities.
- Equip all construction equipment, fixed and mobile, including internal combustion engines, with properly operating and maintained noise mufflers and intake silencers, consistent with the manufacturers' standards.
- Cover or locate all stationary noise-generating equipment, such as generators and compressors, as far as practicable from the nearest residential/institutional property lines to attenuate noise.
- Comply with the applicable local tree protection ordinance.
- Protect any sensitive cultural and paleontological resources by halting work within 50 feet of an unanticipated discovery for evaluation of the find by a qualified professional, require archaeological and/or paleontological monitoring for sites with high sensitivity, and comply with California Health and Safety Code Section 7050.5 and PRC Section 5097.98 in the event that human remains are discovered.

Water Quality Laboratory Building Improvements

Construction of the proposed Water Quality Laboratory Building Improvements project would involve demolishing the existing roof, interior walls, windows, and heating, ventilation, and air conditioning (HVAC) system; retrofitting the existing building; installing micropiles up to ten feet in depth; expanding the existing building by approximately 40,000 square feet; and upgrading utility and lab equipment. Construction activities would occur over an approximately 38-month period.

Up to 20 daily trips would occur during the demolition phase for exporting debris, and approximately 10 daily trips would occur during the building construction phase for material deliveries. During construction, excavation activities are anticipated to reach a maximum of 10 feet in depth, and approximately 6,000 cubic yards (CY) of soil would be exported. This project may require removal of trees protected by the City's Tree Ordinance (La Verne Municipal Code Chapter 18.78, Preservation,

Protection, and Removal of Trees) that are located in close proximity to the existing building. Areas around the building would be landscaped upon the completion of construction activities.

Administration and Control Buildings Seismic Upgrade and Building Improvements

The Administration and Control Buildings Seismic Upgrade and Building Improvements project would involve retrofitting both the Administration and Control buildings within the existing building frames to meet current seismic code requirements and enhancing building functionality over an approximately two-year period.

The project would require demolition activities to remove existing chemical trench components, including non-operational influent conduits, and relocate interior spaces. No structures would be demolished in their entirety. Asbestos and lead are present within the attic crawl space, paint, flooring, and insulation materials. Approximately one to two daily trips would be required to export debris during the demolition phase. During construction, micropiles would be installed to a depth of approximately 60 to 80 feet deep, which is slightly deeper than the original caissons installed for the Administration Building. Installation of the new chemical trench and portions of the main gas line would require excavations to depths of approximately six feet. Minimal soil import may be required for trench fill. Drought-tolerant ornamental landscaping on the north and south sides of the buildings would require removal and would be replaced upon the completion of construction activities.

Water Treatment Chemical Delivery Railroad Tracks Replacement

Construction activities for the Water Treatment Chemical Delivery Railroad Tracks Replacement project would involve removing the existing railroad tracks and replacing them with new tracks, as well as installing new load-cells in the existing storage and unloading bays. Construction would occur over an approximately six-month period. The project may occur during nighttime hours to achieve an expedited construction schedule; in which case, Metropolitan would obtain a noise variance from the City for the nighttime work. Refer to Section 3.4 (Noise) for an analysis of nighttime construction noise.

The project would require excavation activities to approximately four feet in depth and export approximately 1,500 CY of soil. Crushed rock used for track ballast during construction would be sourced from a nearby gravel materials facility, requiring approximately one to two daily trips during construction phase. Construction activities outside the Weymouth Plant along Wheeler Avenue would be secured for public safety, and only equipment in use would be present along the off-site railroad tracks alignment. A Traffic Control Plan would be prepared and implemented for the project in compliance with Metropolitan's standard practices due to potential construction-related impacts along city streets and within a residential community. The tie-in duration and requirements would be defined during the design phase of the project to avoid disruptions to existing rail service on the BNSF line and to scheduled water treatment chemical deliveries to the Weymouth Plant during construction.

Basin Nos. 1 and 2 Rehabilitation

Construction of the Basin Nos. 1 and 2 Rehabilitation project would involve replacing existing internal operational components or conversion of the basins to match the newer basin layout and design of existing Basin Nos. 5 through 8, both of which would require the demolition of wooden flocculators, steel catwalks, mechanical rotating rakes, and other internal basin components. Construction would occur over a period of approximately two years. Lead-based paint and polychlorinated biphenyls (PCBs) may be present in components of the existing Basin Nos. 1 and 2

and would be removed during demolition activities and disposed of at an appropriately licensed facility.

New La Verne Warehouse Facilities

Construction activities for the New La Verne Warehouse Facilities project would involve demolishing the existing Central Stores Warehouse Building 30 and Annex Building 31, constructing a new warehouse building, loading dock, and outdoor canopy storage space; and upgrading Storage Buildings 32 and 32A as well as Investment Recovery Building 33. Construction would occur over a period of approximately two years.

Approximately 40,000 CY of building and pavement materials would be demolished, requiring approximately one to two daily trips for debris export during the demolition phase. Asbestos and lead-based paint may be present in Building 30. The materials would be removed during demolition activities and disposed of at an appropriately licensed facility. Approximately 12,000 CY of soil would be excavated, some of which would be reused as fill material and the remainder of which would be stockpiled or reused on site. The depth of excavation would be approximately three feet.

New Field Engineering Building

The New Field Engineering Building project would involve the construction of a new approximately 40,000-square-foot-building. Construction activities would occur over a period of approximately 16 months.

The existing engineering building would be repurposed for non-occupancy use. Approximately 2,000 CY of soil would be exported, and approximately 2,000 CY of soil would be imported for fill. The project would require excavation to a depth of approximately 10 feet to tie into existing utility lines and install a new foundation. Approximately one to five daily trips would be required to deliver construction materials to the Weymouth Plant during the building construction phase of this project.

Construction Equipment

Potential construction equipment needed for the proposed Program is listed in Table 2. Construction vehicles would access the Weymouth Plant via Wheeler Avenue along the eastern portion of the Program site.

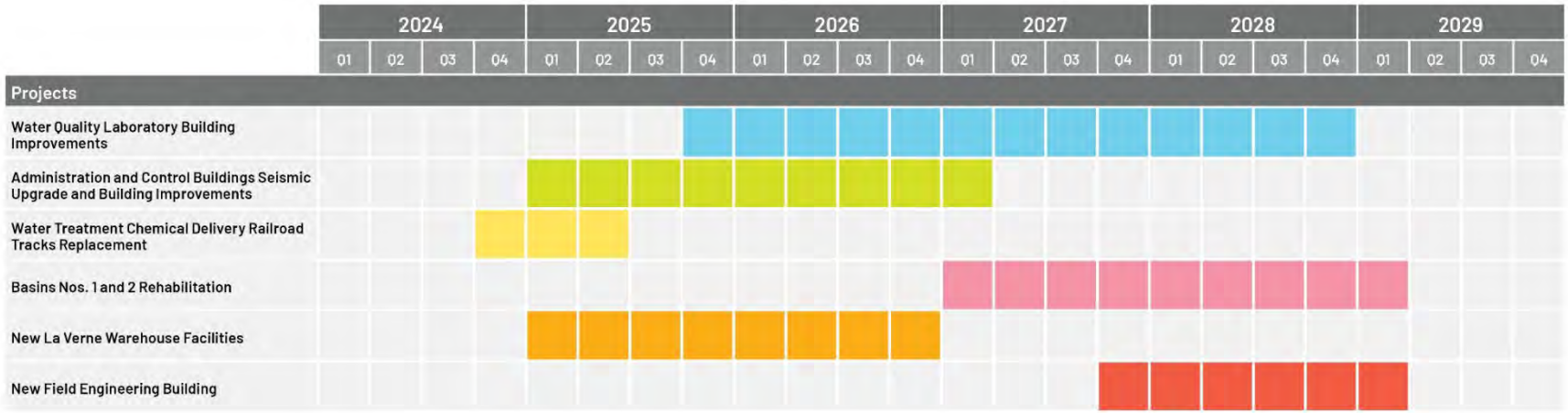
Table 2 Construction Equipment List

Specific Project	Construction Equipment
Water Quality Laboratory Building Improvements	One bore/drill rig, one cement and mortar mixer, three concrete/industrial saws, two compactors, two cranes, one crushing/processing equipment, two dozers, three dumpers/tenders, four excavators, one forklift, four generators, one grader, four front end loaders, one paver, one paving equipment, one pressure washer, one scraper, two skid steer loaders, one surfacing equipment, one sweeper/scrubber, one trencher, four welders
Administration and Control Buildings Seismic Upgrade and Building Improvements	Three aerial lifts, one backhoe, one bore/drill rig, two cement and mortar mixers, two concrete/industrial saws, two compressors, one crane, one dumper/tender, one excavator, two forklifts, two generators, one front end loader, one paving equipment, one pressure washer, one skid steer loader, one sweeper/scrubber, three welders
Water Treatment Chemical Delivery Railroad Tracks Replacement	One backhoe, one compressor, one dumper/tender, one grader, one front end loader, one paving equipment, one pressure washer, one signal board
Basins Nos. 1 and 2 Rehabilitation	Two aerial lifts, one backhoe, four cement and mortar mixers, two concrete/industrial saws, six compressors, one excavator, two generators, one rubber-tired loader, one paving equipment, one pressure washer, one surfacing equipment, one welder
New La Verne Warehouse Facilities	Three aerial lifts, one backhoe, one bore/drill rig, two cement and mortar mixers, two concrete/industrial saws, two compressors, one crane, one crushing/processing equipment, one dumper/tender, one excavator, two forklifts, two generators, one front end loader, one paving equipment, one pressure washer, one skid steer loader, one sweeper/scrubber, three welders
New Field Engineering Building	One backhoe, one bore/drill rig, one cement and mortar mixer, two concrete/industrial saws, one crane, one dozer, two dumpers/tenders, two excavators, one forklift, three generators, one grader, two front end loaders, one paver, one paving equipment, one pressure washer, one scraper, two skid steer loaders, one surfacing equipment, one sweeper/scrubber, one trencher, two welders

2.7 Construction Schedule

All of the individual projects are currently in study or design phases and construction is expected to occur over the course of approximately five years between 2024 to 2029. Figure 3 presents approximate individual project timelines for construction activities, which would be staggered over the five-year period.

Figure 3 Program Construction Schedule



2.8 Operational Characteristics

Upon completion of the Water Quality Laboratory Building Improvements project, the expanded Water Quality Laboratory would require approximately five to ten new on-site employees. No other projects included in the Program would require new or additional employees.

The Water Treatment Chemical Delivery Railroad Tracks Replacement project would not alter the quantity, frequency, or timing of water treatment chemical deliveries, which currently occur two times each month on average. The Basins Nos. 1 and 2 Rehabilitation project would not expand the water treatment capacity of the Weymouth Plant. The Administration and Control Buildings Seismic Upgrade and Building Improvements and New La Verne Warehouse Facilities projects would not require additional Metropolitan employees or additional equipment/material delivery trips.

The Water Quality Laboratory Building Improvements project and New Field Engineering Building Project may increase electricity demand on site. The existing Field Engineering Building would be repurposed for non-occupancy use and would require minimal electricity consumption for lighting, heating, and air conditioning because of its non-occupancy status. In addition, although the expanded Water Quality Laboratory Building would include more energy-efficient components than the existing building, which would lower electricity usage, the expansion may result in a net increase in overall building electricity consumption. As a result, in combination, the existing Field Engineering Building, new Field Engineering Building and expanded Water Quality Laboratory Building may result in a slight net increase of electricity usage. No other projects included in the proposed Program would result in a net increase in electricity demand. The proposed Program may result in a minor net increase in natural gas demand if procurement of electrically-powered technologies and equipment for certain processes and systems associated with the Water Quality Laboratory Building Improvements project, New Field Engineering Building project, and New La Verne Warehouse Facilities project is not feasible.

2.9 Potential Permits and Discretionary Approvals

Table 3 lists the anticipated permits and discretionary approvals that may be required for Program-related activities. One of the purposes of this Draft PEIR is provide these agencies with information to support the agency permitting process. Table 3 also lists the types of activities that would be subject to these requirements.

Table 3 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, lead, and sealants.
State of California		
State Water Resources Control Board Division of Drinking Water (DDW)	Evaluate Existing DDW Permit	Evaluation of existing DDW permit for proposed improvements to 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.
Local		
City of La Verne	Fire Department Review	New structures would be subject to review for 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.
	Tree Removal Permit	Tree removal permit may be required if significant trees in proximity to the Water Quality Laboratory Building are removed.

[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 only to activities at the plant site directly related to the treatment, storage, or transmission of drinking water.

3 Environmental Impact Analysis and Mitigation Measures

Introduction

This chapter introduces the organization of the environmental resource sections, which contain the various impact analyses, as well as the methodology and terminology used throughout this Draft PEIR. It explains the overall methodology used to analyze impacts along with the methodology for the cumulative impact analysis.

Environmental Analysis Scope and Organization

Resource Sections

Sections 3.1 through 3.6 of this chapter contain discussions on the potentially significant impacts of the proposed Program. Each of these sections corresponds with a specific environmental resource area. To assist the reader in comparing information about the various environmental issues, each section of this chapter is organized in the following manner.

- **Existing Conditions**. Describes the existing or baseline conditions in each resource study area for the proposed Program. The baseline conditions for the proposed Program correspond to the time the Notice of Preparation for the proposed Program was published (December 8, 2022).
- **Regulatory Framework**. Provides the federal, state, and local regulations for each resource area that apply to the proposed Program.
- **Thresholds and Methodology**. Identifies the thresholds for determining whether a significant impact would occur with implementation of the proposed Program, in accordance with CEQA Guidelines Appendix G. Describes the methods used for the analysis of impacts and any assumptions that were made in the analysis of impacts.
- **Impacts Analysis**. Presents the evaluation of impacts that would result from implementation of the proposed Program and any mitigation measures that would be necessary to reduce these impacts. The impact analysis compares the proposed Program to existing conditions, also known as the CEQA baseline. Includes the analysis of cumulative impacts for each environmental resource area, evaluated by considering the impacts of the proposed Program when combined with impacts of other projects and programs within the resource study area, and a discussion on the level of significance after mitigation.

The analysis contained in this Draft PEIR addresses both construction and operational impacts associated with implementation of the proposed Program.

Methodology and Terminology Used in the Analysis

In evaluating the potential impacts of the proposed Program, the level of significance is determined by applying the thresholds of significance presented for each resource area. The environmental analyses in Sections 3.1 through 3.6 include a detailed discussion and final impact determination for the proposed Program.

To determine significance, the environmental conditions with implementation of the proposed Program are compared to the baseline condition. The difference between environmental conditions with implementation of the proposed Program and baseline conditions is then compared to a threshold to determine if the difference is significant. CEQA Guidelines Section 15125 requires an EIR include a description of the physical environmental conditions in the vicinity of a proposed project that exist at the time the Notice of Preparation is published (the NOP comment period was open from December 8, 2022 to January 23, 2023). This environmental setting serves as the baseline by which the lead agency determines whether an impact is significant. The baseline condition to which the proposed Program is compared is described in each resource section to determine the significance of impacts.

The following terms are used to describe the level of impact in each resource section:

- **No Impact.** A finding of no impact is made when no adverse changes to the environment are expected.
- **Less-than-significant Impact.** A less-than-significant impact is identified when the proposed Program would cause no substantial adverse change to the environment (i.e., the impact would not exceed the threshold of significance).
- **Less-than-significant Impact with Mitigation Incorporated.** A significant impact is identified when the proposed Program would create a substantial adverse change in any of the physical environmental conditions within the affected resource area. Such an impact would exceed the applicable significance threshold established by CEQA but would be reduced to a less-than-significant level with incorporation of one or more mitigation measures.
- **Significant and Unavoidable Impact.** A significant and unavoidable impact is identified when an impact that would cause a substantial adverse effect on the environment could not be reduced to a less-than-significant level through implementation of any feasible mitigation measure(s).

Mitigation refers to measures that would be implemented to avoid or lessen potentially significant impacts. Pursuant to CEQA Guidelines Section 15370, mitigation includes:

- Avoiding the impact altogether by not taking a certain action or parts of an action.
- Minimizing the impact by limiting the degree or magnitude of the action and its implementation.
- Rectifying the impact by repairing, rehabilitating, or restoring the affected environment.
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- Compensating for the impact by replacing or providing substitute resources or environments.

Mitigation measures would be required as conditions of Program approval and would be monitored to ensure compliance and implementation.

Analysis for each resource area is followed by a determination of the level of significance after mitigation. The level of significance after mitigation is the determination of the level of impact after the implementation of the identified mitigation measures. The level of significance after mitigation is

expressed as no impact, less-than-significant impact, less-than-significant impact with mitigation incorporated, or significant and unavoidable impact, as defined above.

Cumulative Analysis Methodology

A cumulative impact is created as a result of the combination of the project evaluated in an EIR together with other projects causing related impacts. CEQA Guidelines require an EIR discuss the cumulative impacts of a project when the project's incremental effect is "cumulatively considerable," meaning that the project's incremental effects are considerable when viewed in connection with the effects of past, current, and probable future projects. According to CEQA Guidelines Sections 15130(a) and (b), the purpose of cumulative analysis is to provide a discussion of significant cumulative impacts which reflects "the severity of the impacts and their likelihood of occurrence." CEQA Guidelines Section 15130(b) indicates the discussion of cumulative impacts should include:

- Either (A) a list of past, present, and probable future projects producing related or cumulative impacts; or (B) a summary of projections contained in an adopted general plan or similar document, or in an adopted or certified environmental document, which described or evaluated conditions contributing to a cumulative impact;
- A discussion of the geographic scope of the area affected by the cumulative effect;
- A summary of expected environmental effects to be produced by these projects; and
- Reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative effects.

The cumulative impacts analysis in this chapter focuses on the effects of concurrent construction and operation of the proposed Program with existing development and other spatially and temporally proximate projects planned for development in the future. This analysis relies on a list of projects that have the potential to contribute to cumulative impacts within and near the Program site.

Cumulative Projects and Timing

This analysis considers the impacts of the proposed Program in combination with the potential environmental effects of other projects (also referred to as cumulative projects). Cumulative projects include recently completed projects, projects currently under construction, and future projects currently in development. The potential for projects to have a cumulative impact depends on both geographic location as well as project implementation schedule.

A project's schedule is particularly relevant to the consideration of cumulative construction-related impacts because construction impacts tend to be relatively short-term. However, for future projects, construction schedules are often broadly estimated and can be subject to change. Although the timing of the future cumulative projects is likely to fluctuate due to schedule changes or other unknown factors, this analysis conservatively assumes these projects would be implemented concurrently with the proposed Program.

Geographic Scope

The proposed Program would be located in La Verne in eastern Los Angeles County. The cumulative impact analysis in this chapter considers the potential cumulative effects of the proposed Program in combination with existing development and future development projects occurring within a similar geographic area, referred to as the cumulative setting. However, the cumulative setting affected by cumulative projects varies depending on the environmental topic. For example, construction noise impacts would be limited to localized areas directly affected by construction noise, whereas the area affected by a project's air emissions generally includes the entire air basin.

Description of Cumulative Projects

Table 4 lists the current and proposed projects that could potentially contribute to cumulative impacts within the cumulative setting. In addition to the projects listed in Table 4, further development that has not yet been identified could occur within the cumulative setting, as planned by Caltrans, the Los Angeles County Metropolitan Transportation Authority, County of Los Angeles, and/or City of La Verne.

Metropolitan is also planning for implementation of Pure Water Southern California, which is a partnership between Metropolitan and the Los Angeles County Sanitation Districts to beneficially reuse cleaned wastewater that currently is being discharged to the Pacific Ocean from the Joint Water Pollution Control Plant in the city of Carson. The cleaned wastewater would be purified through a new Advanced Water Purification facility. This purified water would then be transported via new conveyance facilities to new or existing water distribution facilities and could be used to recharge groundwater basins through spreading facilities and injection wells and to augment water supplies at water treatment plants owned and operated by Metropolitan, including the Weymouth Plant. Metropolitan is currently preparing a separate Draft PEIR for Pure Water Southern California that will include an evaluation of the environmental impacts of connecting these new conveyance facilities to the Weymouth Plant. Construction of the component of Pure Water Southern California related to the Weymouth Plant is not anticipated to occur until 2028 to 2033 and therefore would only potentially overlap with construction activities for the Water Quality Laboratory Building Improvements, Basins Nos. 1 and 2 Rehabilitation, and New Field Engineering Building projects (see Figure 3 in Section 2.7, *Construction Schedule*).

Table 4 Cumulative Projects List

Location	Project Name[1]	Project Sponsor	Type of Development	Units/Square Footage	Status
3717 Fruit Street	Verdana – Fruit	Private Developer	Multi-Family Townhomes	50 units	Under Construction
Puddingstone Hill	De Anza Heights	Private Developer	Single-Family Residences	15 units	Under Construction
1874, 1876, 1878 Walnut Street	Verdana – Walnut	Private Developer	Single-Family Residences	8 units	Under Construction
2820 Amherst Street	Oakcrest – Amherst	Private Developer	Multi-Family Townhomes	42 units	Under Construction
1510 White Avenue	--	Private Developer	Warehouse	83,699 square feet	Under Construction
2109 White Avenue	--	Private Developer	Multi-Family Townhomes	17 units	Planning/Building Plan Check
2142 Arrow Highway	--	Private Developer	Office and Warehouse	1,713 square feet	Building Plan Check
State Route 210, between North San Dimas Road and Foothill Boulevard interchange	--	Caltrans	Bridge Rehabilitation	--	In Design
Intersection of State Route 66 and Ramona Avenue intersection	--	Caltrans	Curb Ramp Upgrades	--	In Design

Location	Project Name[1]	Project Sponsor	Type of Development	Units/Square Footage	Status
Railroad tracks from Glendora to Montclair (parallel to Arrow Highway in Program site vicinity)	Foothill Gold Line Extension	Metro Gold Line Foothill Extension Construction Authority	Extension of the Los Angeles County Metropolitan Transportation Authority's Foothill Gold Line	12.3 miles of light rail line and four stations	Under Construction

[1]As of February 2023, the projects at 1510 White Avenue, 2109 White Avenue, and 2142 Arrow Highway do not have designated project names.

Sources: Rivera 2023, Caltrans 2023a, Caltrans 2023b, Foothill Gold Line 2023

3.1 Air Quality

3.1.1 Introduction

This section describes the existing conditions, regulatory framework, and potential impacts to air quality that would result from the proposed Program, including potential conflicts with applicable air quality plans, exceedance of air quality standards from criteria pollutant emissions, and exposure of sensitive receptors to substantial pollutant concentrations. The analysis of air quality is based primarily on the Air Quality and Greenhouse Gas Report prepared by Entech Consulting Group in April 2023 and the Local Emissions Analysis and Construction Health Risk Assessment prepared by Rincon Consultants, Inc. in May 2023. The Air Quality and Greenhouse Gas Report and the Local Emissions Analysis and Construction Health Risk Assessment are provided as Appendices B and C to the Draft PEIR.

3.1.2 Existing Conditions

California is divided geographically into 15 air basins for managing the air resources of the state on a regional basis. The proposed Program site is located in La Verne in the eastern part of the San Gabriel Valley, which is located within the South Coast Air Basin (SCAB). The SCAB, which is regulated by the South Coast Air Quality Management District (SCAQMD), is a coastal plain with connecting broad valleys and low hills bound by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto mountains to the north and east. The SCAB also includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. A detailed discussion of the regional climate and air quality conditions in the SCAB is provided in Appendix B.

3.1.2.1 Criteria Air Pollutants

Air pollutants regulated by federal and state law are known as criteria air pollutants and are categorized either as primary pollutants or secondary pollutants. Primary air pollutants are those pollutants emitted directly from the various stationary and mobile sources, including carbon monoxide, volatile organic compounds (VOC), nitrogen oxide (NO_X), sulfur dioxide, respirable and fine particulate matter (particulate matter 10 microns or less in diameter [PM_{10}] and particulate matter 2.5 microns or less in diameter [$PM_{2.5}$], respectively), and lead. Of these, carbon monoxide, sulfur dioxide, PM_{10}, $PM_{2.5}$, and lead are criteria pollutants. VOCs and NO_X are precursors that form secondary criteria pollutants, such as ozone and nitrogen dioxide, through chemical and photochemical reactions in the atmosphere. Presented below is a brief description of each of the primary and secondary criteria air pollutants and their known health effects. A detailed discussion of criteria air pollutants is provided in Appendix B.

- **Ozone -** Ozone, a colorless toxic gas, is produced by a photochemical reaction (triggered by sunlight) between NO_X and VOCs. Nitrogen oxides are formed during the combustion of fuels, while VOCs are formed during incomplete combustion of fuels as well as evaporation of organic solvents. Although upper atmospheric ozone protects the Earth from the sun's harmful rays, ground-level ozone is the main component of smog (United States Environmental Protection Agency [USEPA] 2022a). It enters the bloodstream and interferes

with the transfer of oxygen, depriving sensitive tissues in the heart and brain of oxygen. Although ozone is not directly emitted, it forms in the atmosphere through a photochemical reaction between VOCs and NO_X in the presence of sunlight (i.e., smog) (USEPA 2022b).

- **Organic Gases** – Precursors to Ozone - There are several subsets of organic gases, including reactive organic gases and VOCs.[4] Both VOCs and reactive organic gases are emitted from incomplete combustion of hydrocarbons or other carbon-based fuels. Combustion engine exhaust, oil refineries, and oil-fueled power plants are the primary sources of hydrocarbons. Another source of hydrocarbons is evaporation from petroleum fuels, solvents, dry-cleaning solutions, and paint. In general, the terms "reactive organic gases" and "VOCs" are used interchangeably to refer to the hydrocarbons that are precursors to ozone formation. The primary health effects of hydrocarbons result from the formation of ozone and its related health effects, which are discussed above.
- **Carbon Monoxide** - Carbon monoxide is emitted almost exclusively from incomplete combustion of fossil fuels. In urban areas, carbon monoxide is emitted by motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. Automobile exhaust is the largest carbon monoxide contributor in urban areas. When inhaled at high concentrations, carbon monoxide reduces the oxygen-carrying capacity of the blood, which reduces oxygen reaching the brain, heart, and other body tissues. This condition is especially critical for people with cardiovascular diseases, chronic lung disease, or anemia (SCAQMD 1993; USEPA 2022c).
- **Nitrogen Dioxide** - Nitrogen dioxide is a brownish gas that irritates the lungs. It can cause breathing difficulties at high concentrations. Similar to ozone, nitrogen dioxide is not directly emitted but is formed through a reaction between nitric oxide and atmospheric oxygen. In addition, nitrogen dioxide can increase the risk of acute and chronic respiratory disease (SCAQMD 1993; UESPA 2022d).
- **Particulate Matter** - Particulate matter pollution consists of very small liquid and solid particles floating in the air, including smoke, soot, dust, salts, acids, and metals. Particulate matter also forms when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. Major sources of PM_{10} include motor vehicles; wood burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions. $PM_{2.5}$ results from fuel combustion (from motor vehicles, power generation, and industrial facilities), residential fireplaces, and wood stoves. In addition, PM_{10} and $PM_{2.5}$ can be formed in the atmosphere from gases such as sulfur dioxide, NO_X, and VOCs (SCAQMD 1993).

  Both PM_{10} and $PM_{2.5}$ pose a greater health risk than larger size particles because when inhaled, these tiny particles can penetrate the human respiratory system's natural defenses and damage the respiratory tract. PM_{10} and $PM_{2.5}$ can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances, such as lead, sulfates, and nitrates, can cause lung damage directly. These substances can be absorbed into the bloodstream and cause damage elsewhere in the body; they can also transport adsorbed contaminants such as chlorides or ammonium into the lungs and cause injury (SCAQMD 1993; USEPA 2022e).

[4] Hydrocarbons are organic gases that are formed solely of hydrogen and carbon. Reactive organic gases include all hydrocarbons except those exempted by the California Air Resources Board. Therefore, reactive organic gases are a subset of organic gases based on state rules and regulations. VOCs are similar to reactive organic gases in that they include all organic gases except those exempted by federal law.

- **Sulfur Dioxide** - The main source of sulfur dioxide is combustion of coal and oil used in power stations, industries, and domestic heating. Industrial chemical manufacturing is another source of sulfur dioxide. Sulfur dioxide is an irritant gas that can cause acute respiratory symptoms and diminished respiratory function in children. (SCAQMD 1993; USEPA 2023).
- **Lead** - Lead is a metal found naturally in the environment as well as in manufacturing products. Lead occurs in the atmosphere as particulate matter. Metal processing currently is the primary source of lead emissions. Other stationary sources include waste incinerators, utilities, and lead-acid battery manufacturers. Lead may cause a range of health effects, including anemia, kidney disease, and, in severe cases, neuromuscular and neurological dysfunction (USEPA 2013 and 2022f).

3.1.2.2 Toxic Air Contaminants

No ambient air quality standards exist for toxic air contaminants (TACs) because no exposure level has been deemed safe for humans. Pollutants are identified as TACs because of their potential to increase the risk of developing cancer or their acute or chronic health risks. Individual TACs vary greatly in the risk they present. At a given level of exposure, one TAC may pose a hazard that is many times greater than another. For certain TACs, a unit risk factor can be developed to evaluate cancer risk. For acute and chronic health risks, a similar factor, called a Hazard Index, is used to evaluate risk.

To date, the California Air Resources Board (CARB) has identified 21 TACs and adopted the USEPA's list of hazardous air pollutants as TACs. In August 1998, CARB identified diesel exhaust particulate matter (DPM) emissions as a TAC. The Multiple Air Toxics Exposure Study (MATES) V completed by SCAQMD indicates 67 percent of overall cancer risk from TACs is attributed to DPM in the SCAB and the immediate region around the Program site has an estimated carcinogenic risk of 504 in a million (SCAQMD 2018).

3.1.2.3 Existing Regional and Local Air Quality

Existing ambient air quality conditions in the SCAB are determined by the amount of emissions released by sources and the atmosphere's ability to transport and dilute the emissions. Air quality conditions are also influenced by topography, wind speed, wind direction, and air temperature gradients, which interact to move and disperse air pollutants. SCAQMD maintains monitoring stations within its boundaries that monitor air quality and compliance with associated ambient air quality standards.

SCAQMD has divided its jurisdictional territory of the SCAB into 38 source receptor areas (SRAs) designed to provide a general representation of local meteorological, terrain, and air quality conditions in each area. The Program site is located within SRA 10, Pomona/Walnut Valley. Based on historical concentrations measured at monitoring stations within SRA 10 for 2019 through 2021 (the most recent three years for which CARB has data readily available[5]), local ozone concentrations exceeded federal and state standards in all three years; local PM_{10} concentrations exceeded federal standards in 2020 and state standards in all three years; and local $PM_{2.5}$ concentrations exceeded federal standards in all three years. Local concentrations of nitrogen dioxide and carbon monoxide did not exceed federal or state standards in any of the three years (Appendix B). A detailed discussion of existing regional and local air quality is provided in Appendix B.

[5] Draft ambient air quality monitoring data is available for year 2022; however, this data had not been finalized by CARB as of the date of this report.

3.1.2.4 Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. CARB has identified the following groups most likely to be affected by air pollution: children less than 14 years of age, the elderly over 65 years of age, athletes, and people with cardiovascular and chronic respiratory diseases. According to SCAQMD, sensitive receptors are land uses where populations more susceptible to the adverse effects of air pollution exposure are likely to spend considerable amounts of time. The SCAQMD and CARB guidance documents recommend that sensitive receptor locations include residences, schools, playgrounds, child-care centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes (Appendix B).

As mentioned in the Program Description, the proposed Program is located within an urbanized community and residential neighborhood. Sensitive receptors within 1,000 feet of the Program site generally include the following (Appendix B):

- Single-family residences to the west of Sedalia Avenue (approximately 120 feet west of the Water Quality Laboratory Building Improvements project site) and along Highland Drive (approximately 850 feet south of the New Field Engineering Building project site)
- Calvary Baptist Church and School (approximately 120 feet west of the Water Quality Laboratory Building Improvements project site)
- The Fountains Senior Living Community mobile home park west of Moreno Avenue (approximately 145 feet west of the Basins Nos. 1 and 2 Rehabilitation project site), and the La Verne Mobile Country Club mobile home park (approximately 650 feet north of the Basins Nos.1 and 2 Rehabilitation project site)
- Single-family residences along Wheeler Avenue (adjacent to the Water Treatment Chemical Delivery Railroad Tracks Replacement project site and approximately 160 feet east of the New La Verne Warehouse Facilities project site)
- Kirk B. Johnson Memorial-Pelota Park and Grace Miller Elementary School (approximately 200 feet east of the New La Verne Warehouse Facilities project site and the Water Treatment Chemical Delivery Railroad Tracks Replacement project site) and Kuns Park (approximately 350 feet east of the Water Treatment Chemical Delivery Railroad Tracks Replacement project site)
- Wheeler Avenue Park and multi-family residences along Wheeler Avenue and Arrow Highway (adjacent to the Water Treatment Chemical Delivery Railroad Tracks Replacement project site)
- Joan Macy School (approximately 900 feet west of the Water Treatment Chemical Delivery Railroad Tracks Replacement project site)

The sensitive receptors listed above represent the nearest land uses with the potential to be affected by the proposed Program. Additional sensitive receptors are located further from the Program site in the surrounding community and would be less affected by air emissions than these sensitive receptors.

3.1.3 Regulatory Framework

This section describes the plans, policies, and regulations related to air quality that are applicable to the proposed Program. A more detailed discussion of the regulatory framework pertaining to air quality is provided in Appendix B.

3.1.3.1 Federal

Federal Clean Air Act

The federal Clean Air Act regulates the emission of airborne pollutants from various mobile and stationary sources. The USEPA is the federal agency designated to administer air quality regulation and has established National Ambient Air Quality Standards (NAAQS) for major pollutants at thresholds intended to protect public health. Federal standards have been established for ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, lead, PM_{10}, and $PM_{2.5}$. The SCAB is designated nonattainment (extreme) for the federal 8-hour ozone standard, nonattainment (serious) for the federal $PM_{2.5}$ standard, and attainment for all other federal standards. A detailed discussion of the NAAQS and the attainment status of the SCAB is provided in Appendix B.

3.1.3.2 State

California Clean Air Act

The California Clean Air Act, signed into law in 1988, requires all areas of the state to achieve and maintain the California Air Quality Standards (CAAQS) by the earliest practical date. The CAAQS incorporate additional standards for most of the criteria pollutants and set standards for other pollutants recognized by the state. In general, the California standards are more health protective than the corresponding NAAQS. California has also set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. The SCAB is designated nonattainment for the state 1-hour and 8-hour ozone standards, PM_{10} standard, and $PM_{2.5}$ standard and attainment for all other state standards In addition, near-source monitors in the Los Angeles County portion of the SCAB are designated nonattainment for lead. A detailed discussion of the CAAQS and the attainment status of the SCAB is provided in Appendix B.

State Tailpipe Emission Standards

To reduce emissions from off-road diesel equipment and on-road diesel trucks, CARB established a series of increasingly strict emission standards for new engines, such as the Advanced Clean Trucks regulation, approved in June 2020 (Title 13 California Code of Regulations Sections 1963 - 1963.5 and 2012 – 2012.2). New construction equipment used for the proposed Program, including medium- and heavy-duty trucks and off-road construction equipment, would be required to comply with these standards.

Toxic Air Contaminants

California regulates TACs primarily through the Toxic Air Contaminant Identification and Control Act (Tanner Act) and the Air Toxics “Hot Spots” Information and Assessment Act of 1987 (“Hot Spots” Act). The Tanner Act created California’s program to reduce exposure to air toxics. The “Hot Spots” Act supplements the Tanner Act by requiring a statewide air toxics inventory, notification of people exposed to a significant health risk, and facility plans to reduce these risks. In addition, in response to Assembly Bill (AB) 617 (C. Garcia, Chapter 136, Statues of 2017), CARB established the Community Air Protection Program, which selects communities disproportionately impacted by high cumulative exposure burdens for criteria air pollutants and TACs and develops community air monitoring plans and community emissions reduction programs for these communities.

CARB identified DPM as a TAC in 1998. Shortly thereafter, CARB approved a comprehensive Diesel Risk Reduction Plan to reduce emissions from both new and existing diesel-fueled engines and vehicles. The goal of the plan is to reduce DPM emissions and the associated health risk by 75

percent in 2010 and by 85 percent by 2020. The plan identifies several measures for CARB to implement, which have been enacted since publication of the plan (CARB 2000). CARB estimates that DPM emissions in 2035 will be less than half of those in 2010 (CARB 2023). The proposed Program would be required to comply with applicable diesel control measures.

3.1.3.3 Regional and Local

South Coast Air Quality Management District

SCAQMD attains and maintains air quality conditions in the SCAB through a comprehensive program of planning, regulation, enforcement, technical innovation, and promotion of the understanding of air quality issues. The clean air strategy of SCAQMD includes preparation of plans for attainment of ambient air quality standards, adoption and enforcement of rules and regulations concerning sources of air pollution, and issuance of permits for stationary sources of air pollution.

Air Quality Management Plan

SCAQMD is responsible for developing and adopting an air quality management plan (AQMP), which serves as guidance to bring the region into compliance with the NAAQS and CAAQS. The most recent iteration of the AQMP, the 2022 AQMP, was adopted on December 2, 2022 and includes strategies and measures needed to meet the NAAQS (SCAQMD 2022). The 2022 AQMP identifies that the Basin still has high levels of ozone (smog) as a result of high NO_X emissions. In addition, on October 1, 2015, the USEPA strengthened the NAAQS for ground-level ozone, lowering the primary and secondary ozone standard levels to 70 parts per billion. As a result, the 2022 AQMP addresses additional control strategies for meeting this more stringent standard. In order to reduce ozone levels, extensive use of zero emission technologies across all stationary and mobile sources is proposed by the 2022 AQMP. The 2022 AQMP notes an essential component to meeting the ozone NAAQS will be substantial reliance on future deployment of advanced technologies. Implementing advanced control technologies is projected to result in attainment of the ozone NAAQS by 2037 for the SCAB (SCAQMD 2022).

Rules and Regulations

SCAQMD also has adopted a set of rules and regulations pertaining to various emissions sources such as mobile source, facility-based mobile source, and point source polluters. All projects are subject to SCAQMD rules and regulations in effect at the time of construction. Rules applicable to the proposed Program include, but are not limited to, the following (Appendix B):

- **Rule 401: Visible Emissions.** This rule is intended to prevent the discharge of pollutant emissions from an emissions source that results in visible emissions.
- **Rule 402: Nuisance.** This rule is intended to prevent the discharge of pollutant emissions from an emissions source that results in a public nuisance.
- **Rule 403: Fugitive Dust.** This rule is intended to reduce the amount of particulate matter entrained in the ambient air as a result of anthropogenic (human-made) fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions.
- **Rule 481: Spray Coating Operations.** This rule applies to all spray painting and spray coating operations and equipment and states that a person shall not use or operate any spray painting or spray coating equipment unless certain conditions are met.
- **Rule 1108 - Volatile Organic Compounds.** This rule governs the sale, use, and manufacturing of asphalt and limits the VOC content in asphalt used in the SCAB. This rule also regulates the VOC content of asphalt used during construction.

- **Rule 1113: Architectural Coatings.** The rule prohibits any person to apply or solicit the application of any architectural coating within the SCAQMD with VOC content in excess of the values specified in Rule 1113.
- **Rule 1143 – Paint Thinners and Solvents.** This rule governs the manufacture, sale, and use of paint thinners and solvents used in thinning coating materials, cleaning of coating application equipment, and other solvent cleaning operations by limiting their VOC content.
- **Rule 1186 – Fugitive Dust.** This rule limits the generation of fugitive dust on paved and unpaved roads. It sets certification protocols and requirements for street sweepers that are under contract to provide sweeping services to any federal, state, county, agency, or special districts such as water, air, sanitation, transit, or school district.

SCAQMD has also promulgated Rule 2305 (Warehouse Actions and Investments to Reduce Emissions Program) and Rule 316 (Fees for Rule 2305). Rule 2305 is intended to reduce local and regional emissions of NO_X and $PM_{2.5}$ and to facilitate local and regional emissions reductions associated with warehouses and the mobile sources attracted to warehouses in order to assist in meeting state and federal air quality standards for ozone and $PM_{2.5}$. This rule applies to owners and operators of warehouses located in the SCAQMD jurisdiction with greater than or equal to 100,000 square feet of indoor floor space in a single building. With regard to Rule 316, California Health and Safety Code Section 40522.5 provides authority for SCAQMD to adopt a fee schedule for indirect sources of emissions which are regulated, but for which permits are not issued. The purpose of this rule is to recover the cost of implementing Rule 2305 (Appendix B). The New La Verne Warehouse Facilities would be less than 100,000 square feet in size; therefore Rules 2305 and 316 would not apply to the proposed Program.

Toxic Air Contaminants

SCAQMD limits emissions and public exposure to TACs through a number of programs. Under SCAQMD Regulation XIV (Toxics and Other Non-Criteria Pollutants), and in particular Rule 1401 (New Source Review), all sources with the potential to emit TACs are required to obtain permits from SCAQMD. Permits may be granted to these operations if they are constructed and operated in accordance with applicable regulations, including new source review standards and air toxics control measures. SCAQMD prioritizes TAC-emitting stationary sources based on the quantity and toxicity of the TAC emissions and the proximity of the facilities to sensitive receptors.

City of La Verne General Plan

The Resource Management Chapter of the City's General Plan contains implementation measures designed to reduce vehicular air pollution and energy consumption. These include, but are not limited to, participating in the SCAQMD attainment program, developing pedestrian and bicycle pathways, and requiring energy-saving designs and features in new and refurbished buildings (City of La Verne 1998).

3.1.4 Thresholds and Methodology

3.1.4.1 Thresholds of Significance

Table 5 lists the thresholds from Appendix G of the CEQA Guidelines that pertain to air quality, which are addressed in the Draft PEIR. It was determined in the NOP/Initial Study (Appendix A) that implementation of the proposed Program would have a less-than-significant impact related to the

potential to result in other emissions, such as those leading to odors, adversely affecting a substantial number of people. Therefore, no further analysis of threshold (d) is included in the Draft PEIR.

Table 5 CEQA Thresholds for Air Quality

Threshold Would the proposed Program:
a. Conflict with or obstruct implementation of the applicable air quality plan?
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?
c. Expose sensitive receptors to substantial pollutant concentrations?
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Metropolitan has not developed specific air quality thresholds for air quality impacts. However, Appendix G of the CEQA Guidelines states the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the determinations in Table 5. As such, the significance thresholds and analysis methodologies in the SCAQMD's guidance documents will be used in evaluating air quality impacts, including the following

- SCAQMD (1993) CEQA Air Quality Handbook (currently being updated) and supplemental guidance
- SCAQMD (2008) Final Localized Significance Threshold Methodology
- SCAQMD (2019) South Coast AQMD Air Quality Significance Thresholds

The following subsections discuss the significance criteria established by SCAQMD to make the determinations in Table 5 for thresholds (a) through (c).

Consistency with Applicable Air Quality Plan

Based on SCAQMD guidance (SCAQMD 1993), consistency with the AQMP is determined based on the following two criteria:

- Whether the proposed Program would result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP
- Whether the proposed Program would exceed the growth assumptions in the AQMP

Regional Criteria Air Pollutant Emissions

Table 6 presents the significance criteria established by SCAQMD to evaluate a project's potential to result in a cumulatively considerable net increase of criteria pollutants for which the SCAB is nonattainment under federal and state ambient air quality standards during construction and operation.

Table 6 SCAQMD Regional Air Quality Significance Thresholds

	Mass Daily Emission Thresholds (pounds per day)	
Pollutant	**Construction**	**Operation**
Nitrogen Oxides (NO_X)	100	55
Volatile Organic Compounds (VOC)	75	55
Respirable Particulate Matter (PM_{10})	150	150
Fine Particulate Matter ($PM_{2.5}$)	55	55
Sulfur Oxides (SO_X)	150	150
Carbon Monoxide (CO)	550	550
Lead[1]	3	3

[1] Because the proposed Program would not involve the development of any major lead emissions sources; lead emissions are not analyzed in this Draft PEIR.

Source: SCAQMD 2023

Exposure of Sensitive Receptors to Substantial Pollutant Concentrations

Criteria Air Pollutant Emissions

Localized Significance Thresholds (LSTs) were developed by SCAQMD in response to exposure of individuals to criteria pollutants in local communities and have been developed for NO_x, carbon monoxide, PM_{10}, and $PM_{2.5}$. LSTs represent the maximum emissions from a project that will not cause or contribute to an air quality exceedance of the most applicable federal or state ambient air quality standard at the nearest sensitive receptor. LSTs have been developed for emissions generated in construction areas up to five acres in size. However, LSTs only apply to emissions in a fixed stationary location and are not applicable to mobile sources, such as cars on a roadway. Due to the size of the proposed Program site, refined air dispersion modeling was performed to determine the potential impacts to local receptors from emissions of NO_x, carbon monoxide, PM_{10}, and $PM_{2.5}$ during construction, and the NAAQS and CAAQS were utilized as the significance thresholds for the local emissions impact analysis rather than the LST screening tables (Appendix C).Table 7 summarizes the thresholds used in the analysis of localized critical air pollutant emissions for the proposed Program.

Table 7 Significance Thresholds for Localized Emissions of Criteria Air Pollutants

Pollutant	Averaging Period	Threshold ($\mu g/m^3$)
Nitrogen Dioxide[1]	1-hour	339
	Annual	57
Carbon Monoxide[1]	1-hour	23,000
	8-hour	10,000
Particulate Matter[2]	24-hour	10.4
	Annual	1

$\mu g/m^3$ = micrograms per cubic meter

[1] Thresholds are based on the applicable NAAQS and CAAQS. Localized pollutant concentrations of nitrogen dioxide and carbon monoxide, inclusive of existing pollutant levels and Program-generated emissions, are compared to these thresholds.

[2] Thresholds are recommended by SCAQMD to evaluate construction impacts. Only Program-generated emissions were compared to these thresholds, pursuant to SCAQMD guidance.

Source: Appendix C

Toxic Air Contaminant Emissions

The USEPA considers those pollutants that could cause cancer risks between one in 10,000 (1.0×10^{-4}) and one in one million (1.0×10^{-6}) for risk management. Proposition 65 (California Health and Safety Code Section 25249.6), enacted in 1986, prohibits a person, in the course of doing business, from knowingly and intentionally exposing any individual to a chemical that has been listed as known to the State to cause cancer or reproductive toxicity without first giving clear and reasonable warning. For a chemical that is listed as a carcinogen, the "no significant risk" level under Proposition 65 is defined as the level that is calculated to result in not more than one excess case of cancer in 100,000 individuals (1.0×10^{-5}). SCAQMD recommends the use of this risk level (also reportable as 10 in one million) as the significance threshold for toxic air contaminants. SCAQMD also recommends that the non-carcinogenic hazards of TACs should not exceed a hazard index[6] of 1.0 for either chronic or acute effects (SCAQMD 2023a).

3.1.4.2 Methodology

The analysis of proposed Program impacts to air quality is based on the Air Quality and Greenhouse Gas Report prepared by Entech Consulting Group in April 2023 (Appendix B) and the Local Emissions Analysis and Construction Health Risk Assessment prepared by Rincon Consultants, Inc. in April 2023 (Appendix C). Each report presents a detailed discussion of the methodology used in evaluating impacts of the proposed Program, including quantification of Program emissions using the California Emissions Estimator Model (CalEEMod) version 2022.1.0, dispersion modeling using the USEPA-approved AERMOD, and quantification of health risk using health risk calculation methodology consistent with the 2015 Office of Environmental Health Hazard Assessment guidance. The proposed Program does not include sources of lead emissions; therefore, lead is not discussed further in this section.

3.1.5 Impacts Analysis

3.1.5.1 Program Analysis

Threshold AQ-A: *Would the proposed Program conflict with or obstruct implementation of the applicable air quality plan?*

The following subsections discuss the consistency of proposed Program with the SCAQMD 2022 AQMP based on the two criteria established by the SCAQMD *CEQA Air Quality Handbook* (SCAQMD 1993):

1. Whether the proposed Program would result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP
2. Whether the proposed Program would exceed the growth assumptions in the AQMP

Violations of federal and state air quality standards would occur if the proposed Program would generate emissions in excess of SCAQMD regional or LSTs set forth in Table 6 and Table 7. As detailed further under AQ-B, maximum daily emissions of VOC generated during Program construction would exceed the SCAQMD regional threshold in years 2026, 2028, and 2029 (see Table 8), primarily due to the application of architectural coatings to large surface areas on building exteriors and interiors for the Administration and Control Buildings Seismic Upgrade and Building

[6] The hazard index is the summation of the hazard quotients for all chemicals to which an individual would be exposed.

Improvements, New La Verne Warehouse Facilities, Water Quality Laboratory Building Improvements, and New Field Engineering Building projects. Because of this exceedance, Program construction would therefore be inconsistent with the 2022 AQMP pursuant to criteria #1. As discussed further under AQ-B, operation of the projects included in the proposed Program would not generate air pollutant emissions in excess of SCAQMD regional thresholds. As discussed in AQ-C, the proposed Program would not result in the generation of localized pollutant concentrations of NO_x, carbon monoxide, PM_{10}, or $PM_{2.5}$ in exceedance of established LSTs identified in Table 7.

The Program site is located in an urban area, and it is likely construction workers for the proposed Program would be sourced from the existing, regional workforce and would not indirectly result in the relocation of people to Los Angeles County. The proposed Program would not involve additional housing; therefore, the proposed Program would not directly result in population growth. Approximately five to ten new Metropolitan employees would be employed as a result of the expanded Water Quality Laboratory Building; however, these employees would be sourced from the region's existing workforce and would not induce substantial population growth in Los Angeles County. The proposed Program would not require zone changes, conditional uses, or entitlements that would modify the existing zoning or land use designations of the Program site, which was used, in part, to develop 2022 AQMP growth assumptions and emission inventories. Therefore, the proposed Program would not generate new growth that would conflict with or obstruct implementation of the 2022 AQMP pursuant to criteria #2.

Because Program construction would generate VOC emissions in excess of the SCAQMD regional threshold in years 2026, 2028, and 2029 (see Table 8 under Impact AQ-B), the proposed Program would potentially result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP. Therefore, pursuant to criteria #1 established by the SCAQMD *CEQA Air Quality Handbook*, without mitigation, the proposed Program would be inconsistent with the AQMP, and impacts would be **significant.** Implementation of MM AQ-1 (detailed in Section 3.1.5.3 [Mitigation Measure]), which involves the use of "super-compliant" low VOC paints during the architectural coating phases of the Water Quality Laboratory Building Improvements, Administration and Control Buildings Seismic Upgrades and Building Improvements, New La Verne Warehouse Facilities, and New Field Engineering Building projects, would be required. Further information on how this measure would reduce impacts to less than significant can be found in Section 3.1.5.3 (Mitigation Measure).

Significance after Mitigation: Less than significant

Threshold AQ-B: *Would the proposed Program result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?*

Construction Emissions

Construction of the proposed Program would result in temporary increases in air pollutant emissions as a result of the use of heavy-duty construction equipment; vehicle trips generated by construction workers and the transport of construction materials, demolition debris, and soil; and off-gassing of architectural coatings and paving. Fugitive dust emissions would primarily result from site preparation activities, and NO_X emissions would primarily result from the use of construction equipment and truck trips. VOC emissions would primarily result from off-gassing of architectural coatings and diesel exhaust generated by off-road equipment. Construction emissions would vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Table 8 presents maximum daily regional emissions generated by each construction phase during each year of Program construction when compared to SCAQMD regional thresholds (see Table 6). Construction activities for several projects included in the Program would occur simultaneously, resulting in an overlap of construction activities and associated emissions in years 2025 through 2029. As shown in Table 8, during years 2024, 2025, and 2027, construction-related maximum daily regional emissions would not exceed the SCAQMD regional thresholds. However, in years 2026, 2028, and 2029, maximum daily emissions of VOC would exceed the SCAQMD regional threshold. The high VOC emissions in years 2026, 2028, and 2029 would primarily be the result of the application of architectural coatings to large surface areas on building exteriors and interiors. Because proposed Program construction activities would result in VOC emissions in exceedance of SCAQMD thresholds, Program construction would potentially result in a cumulatively considerable net increase of a criteria pollutant for which the SCAB is nonattainment under an applicable federal or state ambient air quality standard, and impacts would be **significant.** Therefore, without mitigation, the proposed Program would result in a significant impact related to regional construction emissions of VOC. MM AQ-1 (detailed in Section 3.1.5.3 [Mitigation Measure]), which involves the use of "super-compliant" low VOC paints during the architectural coating phases of the Water Quality Laboratory Building Improvements, Administration and Control Buildings Seismic Upgrades and Building Improvements, New La Verne Warehouse Facilities, and New Field Engineering Building projects, would be required. Further information on how this measure would reduce impacts to less than significant can be found in Section 3.1.5.3 (Mitigation Measure).

Significance after Mitigation: Less than significant

Table 8 Proposed Program Regional Construction Emissions

	Maximum Daily Emissions (pounds per day)					
Construction Phase	**VOC**	**NO_x**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
2024						
Water Treatment Chemical Delivery Railroad Tracks Replacement	0.7	3.9	11.4	< 0.1	2.4	0.6
2025						
Water Treatment Chemical Delivery Railroad Tracks Replacement	2.2	25.2	56.7	0.1	5.7	1.5
Administration and Control Buildings Seismic Upgrade and Building Improvements						
New La Verne Warehouse Facilities						
Water Quality Laboratory Building Improvements						
2026						
Administration and Control Buildings Seismic Upgrade and Building Improvements	**84.7**	24.8	58.3	0.1	5.7	1.5
New La Verne Warehouse Facilities						
Water Quality Laboratory Building Improvements						
2027						
Administration and Control Buildings Seismic Upgrade and Building Improvements	2.0	22.7	57.1	0.1	6.8	2.0
Water Quality Laboratory Building Improvements						
Basins Nos. 1 and 2 Rehabilitation						
New Field Engineering Building						

Construction Phase	Maximum Daily Emissions (pounds per day)					
	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
2028						
Water Quality Laboratory Building Improvements	**80.3**	27.5	68.2	0.1	7.7	2.0
Basins Nos. 1 and 2 Rehabilitation						
New Field Engineering Building						
2029						
Basins Nos. 1 and 2 Rehabilitation	**77.1**	1.0	4.9	< 0.1	0.3	0.1
New Field Engineering Building						
Maximum Daily Emissions[1]	**85**	**28**	**68**	**< 1**	**8**	**2**
SCAQMD Regional Significance Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Exceeds Threshold?	**Yes**	**No**	**No**	**No**	**No**	**No**

VOC = volatile organic compounds; NO_X = nitrogen oxides; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = particulate matter measuring 10 microns or less in diameter; $PM_{2.5}$ = particulate matter measuring 2.5 microns or less in diameter

[1] Maximum daily emissions would occur in 2028 with the exception of maximum daily VOC emissions, which would occur in 2026. Maximum daily emissions were rounded to the nearest whole number.

Source: Appendix B

Operational Emissions

Operation of the proposed Program would generate air pollutant emissions primarily through the off-gassing of VOCs from architectural coatings on new buildings and of paved areas (i.e., area sources), potential additional natural gas usage at the expanded Water Quality Laboratory and New Field Engineering building (i.e., energy sources), and additional vehicle trips associated with the approximately five to ten new employees (i.e., mobile sources). No new stationary sources of air pollutant emissions (e.g., generators) are proposed. Estimated maximum daily operational emissions are presented in Table 9. As shown therein, operational emissions under the proposed Program would not exceed SCAQMD regional thresholds. Therefore, operation of the proposed Program would not result in a considerable net increase of a criteria pollutant for which the SCAB is nonattainment under an applicable federal or state ambient air quality standard, and impacts would be **less than significant**.

Significance: Less than significant

Table 9 Proposed Program Regional Operational Emissions

Source	Maximum Daily Emissions (pounds per day)					
	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Area	5.3	0.1	7.4	< 0.1	< 0.1	< 0.1
Energy	0.1	1.0	0.9	< 0.1	0.1	0.1
Mobile	0.1	< 0.1	0.2	< 0.1	< 0.1	< 0.1
Total[1]	**5**	**1**	**9**	**< 1**	**< 1**	**< 1**
SCAQMD Regional Significance Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

VOC = volatile organic compounds; NO_X = nitrogen oxides; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = particulate matter measuring 10 microns or less in diameter; $PM_{2.5}$ = particulate matter measuring 2.5 microns or less in diameter

[1] Totals may not add up due to rounding. Total maximum daily emissions were rounded to the nearest whole number.

Source: Appendix B

Overlap of Construction and Operational Emissions

Of the projects that would result in net new operational air pollutant emissions (i.e., Water Quality Laboratory Building Improvements, New La Verne Warehouse Facilities, and New Field Engineering Building projects), only the New La Verne Warehouse Facilities project would be completed and fully operational prior to the completion of the remaining proposed Program construction activities, based on the estimated construction schedule available at the time of this Draft PEIR. Table 10 summarizes maximum daily emissions associated with operation of the New La Verne Warehouse Facilities in combination with maximum daily emissions generated by the anticipated remaining Program construction activities that would be occurring simultaneously. As shown in Table 10, during overlap of operation of the New La Verne Warehouse Facilities and the remaining Program construction activities, combined VOC emissions would exceed the regional SCAQMD operational threshold. Due to the exceedance of the SCAQMD regional operational threshold for VOCs during combined Program construction and operational activities, the proposed Program would potentially result in a cumulatively considerable net increase of a criteria pollutant for which the SCAB is nonattainment under an applicable federal or state ambient air quality standard, and impacts would be **significant** without mitigation. Implementation of MM AQ-1 (detailed in Section 3.1.5.3 [Mitigation Measure]), which involves the use of "super-compliant" low VOC paints during the architectural coating phases of the Water Quality Laboratory Building Improvements, Administration and Control Buildings Seismic Upgrades and Building Improvements, New La Verne Warehouse Facilities, and New Field Engineering Building projects, would be required. Further information on how this measure would reduce impacts to less than significant can be found in Section 3.1.5.3 (Mitigation Measure).

Significance after Mitigation: Less than significant

Table 10 Combined Regional Construction and Operational Emissions (2027-2029)

	Maximum Daily Emissions (pounds per day)					
Source	**VOC**	**NO_x**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Maximum Construction Emissions (2028)[1]	80.3	27.5	68.2	0.2	7.7	2.0
Operational Emissions for New La Verne Warehouse Facilities	2.9	0.5	4.4	<0.1	0.1	< 0.1
Construction Emissions + New La Verne Warehouse Facilities Operational Emissions[2]	**83.2**	29.0	72.6	0.2	7.8	2.0
SCAQMD Regional Significance Thresholds (Operation)	**55**	**55**	**550**	**150**	**150**	**55**
Exceed Threshold?	**Yes**	**No**	**No**	**No**	**No**	**No**

VOC = volatile organic compounds; NO_X = nitrogen oxides; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = particulate matter measuring 10 microns or less in diameter; $PM_{2.5}$ = particulate matter measuring 2.5 microns or less in diameter.

[1] Between years 2027 and 2029, maximum daily construction emissions during concurrent operation of the New La Verne Warehouse Facilities and remaining Program construction activities would occur during year 2028. As a result, maximum daily construction emissions for year 2028 are utilized in this analysis.

[2] Combined maximum daily emissions were rounded to the nearest whole number.

Source: Appendix B

Threshold AQ-C: *Would the proposed Program expose sensitive receptors to substantial pollutant concentrations?*

As noted in Section 3.1.2, *Existing Conditions*, the nearest sensitive receptors to the Program site include single-family and multi-family residences, senior living communities, schools (Calvary

Baptist Church and School, Grace Miller Elementary school, Joan Macy School), and parks (Kirk B. Johnson Memorial-Pelota Park, Kuns Park, Wheeler Avenue Park).

Localized Construction Emissions

Criteria Air Pollutants

Primary criteria pollutants that have the potential to result in localized impacts include carbon monoxide, nitrogen dioxide, PM_{10}, and $PM_{2.5}$ (SCAQMD 2008). Construction activities would result in temporary increases in local criteria air pollutant concentrations as a result of the use of heavy-duty construction equipment, construction worker vehicle trips, and the transport of construction materials, demolition debris, and soil. Particulate matter emissions would primarily result from site preparation activities, and nitrogen dioxide and carbon monoxide emissions would primarily result from the use of construction equipment and truck trips. Construction emissions would vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. The analysis presented herein is based on a weighted average of the maximum daily emissions of each pollutant generated during construction of each individual project under the proposed Program and evaluates peak emissions during construction (Appendix C).

Table 11 shows the maximum estimated localized pollutant concentrations generated during construction of the proposed Program. As shown therein, Program construction activities would not generate localized pollutant concentrations of nitrogen dioxide, carbon monoxide, PM_{10}, or $PM_{2.5}$ in exceedance of established thresholds (see Table 7). Therefore, Program construction would not expose sensitive receptors to substantial concentrations of criteria air pollutants, and impacts would be **less than significant.**

Significance: Less than significant

Table 11 Estimated Maximum Localized Pollutant Levels During Construction

Pollutant	Averaging Period	Background Pollutant Concentration ($\mu g/m^3$)[1]	Localized Pollutant Concentration Generated by Program Construction ($\mu g/m^3$)	Background Concentration + Proposed Program Concentration[1] ($\mu g/m^3$)	Threshold ($\mu g/m^3$)[2]	Exceeds Threshold?
Nitrogen Dioxide	1-hour	127.88	76.11	203.99	339	No
	Annual	33.96	3.54	37.50	57	No
Carbon Monoxide	1-hour	2,057	106	2,163	23,000	No
	8-hour	1,623	38	1,661	10,000	No
PM_{10}[1]	24-hour	–	0.13	–	10.4	No
	Annual	–	0.03	–	1	No
$PM_{2.5}$[1]	24-hour	–	0.08	–	10.4	No
	Annual	–	0.02	–	1	No

PM_{10}= particulate matter measuring 10 microns in diameter or less, $PM_{2.5}$ = particulate matter measuring 2.5 microns in diameter or less; $\mu g/m^3$ = micrograms per cubic meter

[1] The thresholds recommended by SCAQMD for evaluating localized construction-related emissions of PM_{10} and $PM_{2.5}$ are not based on background concentrations. As a result, background pollutant concentrations are not provided for these pollutants or added to Program-generated emissions. Only Program-generated emissions were compared to the thresholds for these pollutants, pursuant to SCAQMD guidance (SCAQMD 2008).

Source: Appendix C

Fugitive Dust Emissions

Program construction activities would result in temporary generation of fugitive dust emissions, primarily from site preparation and grading activities, transport of soil, and movement of heavy-duty construction equipment on unpaved surfaces. Construction contractors for projects included in the proposed Program would be required to comply with SCAQMD Rule 403. Rule 403 is intended to reduce the amount of particulate matter in the air due to fugitive dust sources by requiring actions to minimize the creation of fugitive dust. Rule 403 includes the following measures and is applicable as necessary to the proposed Program:

- Nontoxic chemical soil stabilizers shall be applied according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more).
- Active sites shall be watered at least twice daily. Locations where grading is to occur shall be thoroughly watered prior to earthmoving.
- All trucks hauling dirt, sand, soil, or other loose materials shall be covered or have at least 0.6 meter (two feet) of freeboard (vertical space between the top of the load and top of the trailer) maintained in accordance with the requirements of California Vehicle Code Section 23114.

Adherence to the dust suppression requirements included in Rule 403, which are incorporated by reference in Section 01065 of Metropolitan's construction contractor specifications, would minimize the creation of fugitive dust and the associated potential to expose sensitive receptors to localized fugitive dust emissions. Therefore, Program construction would not expose sensitive receptors to substantial concentrations of fugitive dust emissions, and impacts would be **less than significant.**

Significance: Less than significant

Toxic Air Contaminants

Construction of the proposed Program would result in temporary increases in local TAC emissions as a result of DPM generated by heavy-duty construction equipment and diesel-fueled truck trips used for the transport of demolition debris and soil. The proposed primary construction haul route for diesel-fueled truck trips for demolition and soil export as well as material delivery would use the Wheeler Avenue gate entrance/exit located on the east side of the Weymouth Plant. Trucks would travel northeast on Wheeler Avenue to Foothill Boulevard and merge onto SR 210 or south on Wheeler Avenue to Arrow Highway and merge onto SR 57. Construction traffic on residential streets would generally be avoided with the exception of the Water Treatment Chemical Delivery Railroad Tracks Replacement Project, which would require minor volumes of construction traffic on residential streets during temporary intersection closures. All construction staging and parking would occur at an existing staging area located in the south-central portion of the Weymouth Plant, which would result in the staging of heavy-duty construction equipment away from nearby sensitive receptors**.**

Table 12 presents the maximum estimated total cancer and non-cancer chronic risk for the maximum exposed residential receptor of the 133 receptors that were modeled.[7] (Acute health risk was not quantified because there is no acute risk associated with DPM exposure.) As shown therein, the cancer risk from Program construction activities at nearby sensitive receptors would not exceed the SCAQMD threshold of 10 excess cancer cases in one million people. In addition, the maximum chronic hazard index would not exceed the SCAQMD threshold of one. Furthermore, TAC emissions during construction would result in a cancer burden of approximately 0.002 excess cancer cases

[7] As noted in the Local Emissions Analysis and Construction Health Risk Assessment (Appendix C), school land uses were modeled as residential receptors in addition to residences, which represents a conservative analysis because exposure would be highest at residential receptors due to the extended duration of time people are present at their residences as compared to schools.

within the zone of impact, which would not exceed the SCAQMD threshold of 0.5 excess cancer cases. The remaining 132 residential receptors included in the model would be exposed to lower cancer risk, cancer burden, and chronic risk than those presented in Table 12 for the maximum exposed residential receptor. In addition, those receptors not specifically included in the model would be exposed to less health risk than the maximum exposed residential receptor due to increased dispersion of pollutants at distances greater than the 1,000-foot radius (Appendix C).

Table 12 Estimated Cancer and Non-Cancer Health Risk During Construction

	Cancer Risk (excess cases per one million persons)	Cancer Burden (excess cancer cases)	Chronic Risk
Maximum Exposed Residential Receptor (#76)[1]	2.615	0.002	0.006
SCAQMD Threshold	10	0.5	1
Exceed Threshold?	No	No	No

SCAQMD = South Coast Air Quality Management District

[1] The receptor number indicates the number of the receptor from the modeling program that would be exposed to the highest health risk. A total of 133 receptors were modeled, and Receptor #76, located at approximately 637 Sedalia Avenue in La Verne, was found to be exposed to the highest health risk.

Source: Appendix C

As discussed in Appendix A, construction of the Water Treatment Chemical Delivery Railroad Tracks Replacement project would result in the removal of approximately two cubic yards of soil with lead concentrations in exceedance of California hazardous waste criteria (but below federal hazardous waste criteria) near the southern terminus of the railroad tracks alignment. Ground disturbance generating fugitive dust during track replacement in this location would have the potential to release airborne hazardous materials into the environment. 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, removal of this soil would be carried out in accordance with a Soil Management Plan that would provide a framework for minimizing fugitive dust during construction activities. The project's construction contractor(s) would also be required to comply with SCAQMD Rule 403, which would further reduce the potential for contaminated particulate matter to become airborne during construction. Therefore, Program construction would not expose sensitive receptors to substantial concentrations of TACs, and impacts would be **less than significant.**

Significance: Less than significant

Localized Operational Emissions

Criteria Air Pollutant Emissions

A local criteria air pollutant emissions analysis was not conducted for Program operation because new emissions of criteria air pollutant emissions would be limited to approximately five to ten new Metropolitan employee vehicle trips and a potential minor increase in natural gas usage if procurement of electrically-powered technologies and equipment for certain processes and systems in the Water Quality Laboratory Building Improvements, New Field Engineering Building, and New La Verne Warehouse Facilities projects is not feasible. The minor increase in criteria air pollutant emissions associated with these sources would not have the potential to result in localized air quality impacts from operational activities (Appendix C). Therefore, Program operation would not expose sensitive receptors to substantial concentrations of criteria air pollutant emissions, and impacts would be **less than significant.**

Significance: Less than significant

Fugitive Dust Emissions

Program operation would not include new sources of fugitive dust emissions. Therefore, Program operation would not expose sensitive receptors to substantial concentrations of fugitive dust emissions, and impacts would be **less than significant.**

Significance: Less than significant

Toxic Air Contaminants

SCAQMD recommends health risk assessments be conducted for substantial sources of diesel particulate emissions (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions. As indicated in Section 2.8, *Operational Characteristics*, the Water Treatment Chemical Delivery Railroad Tracks Replacement project would not alter the quantity, frequency, or timing of water treatment chemical deliveries or the associated emissions. In addition, the New La Verne Warehouse Facilities project would not result in additional heavy-duty, diesel-fueled trips to the Weymouth Plant such that operational TAC emissions and associated health risk in the Program site vicinity would increase. Therefore, because the proposed Program does not include new sources of operational TAC emissions, an operational air quality health risk assessment is not necessary. Program operation would not expose sensitive receptors to substantial TAC concentrations, and impacts would be **less than significant**.

Significance: Less than significant

3.1.5.2 Cumulative Analysis

Cumulative impacts consider impacts at the Program site together with similar impacts of existing development and reasonably anticipated projects in the Program site vicinity. The general approach to cumulative impact analysis used in this Draft PEIR is discussed in Section 3, *Environmental Impact Analysis and Mitigation Measures*, and cumulative projects are listed in Table 4 of that section. The geographic scope for analyzing cumulative air quality impacts is the SCAB. The SCAB is designated a nonattainment area for ozone, PM_{10}, and $PM_{2.5}$. The SCAB is in attainment of all other NAAQS and CAAQS (Appendix B). Therefore, because the SCAB is designated nonattainment for ozone and particulate matter, cumulative air quality impacts related to particulate matter and ozone are potentially **significant**. As discussed in Section 3.1.2, *Existing Conditions*, the immediate region around the Program site has an estimated carcinogenic risk of 504 in a million, which is higher than the basin-wide average of 424 in a million (SCAQMD 2018). Therefore, cumulative air quality impacts related to TACs are also potentially **significant**.

Construction

In accordance with CEQA Guidelines Section 15064(h)(3), SCAQMD's approach for assessing cumulative impacts related to criteria air pollutants is based on the AQMP forecasts of attainment of ambient air quality standards in accordance with the requirements of the federal and California Clean Air Acts. If a project's mass regional emissions or localized emissions do not exceed the applicable SCAQMD thresholds, then the project's criteria pollutant emissions would not be cumulatively considerable. Program construction would generate emissions of the ozone precursors VOC and NO_X as well as particulate matter and would therefore contribute to the SCAB's existing nonattainment status for ozone and particulate matter. As described under AQ-B and AQ-C, Program emissions of criteria air pollutants during construction and overlapping construction/operational phases would exceed the regional SCAQMD threshold for VOC but would not exceed other SCAQMD regional or

localized significance thresholds for ozone precursor NO_X or particulate matter. Therefore, the proposed Program's contribution to cumulative air quality impacts from regional ozone concentrations (for which VOC is a precursor) would be **cumulatively considerable (significant)**, and implementation of MM AQ-1 (detailed in Section 3.1.5.3 [Mitigation Measure]) would be required. However, the proposed Program's contribution to cumulative air quality impacts related to regional and localized particulate matter concentrations would **not be cumulatively considerable (less than significant).** Further information on how MM AQ-1 would reduce the proposed Program's contribution to cumulative air quality impacts from regional ozone concentrations can be found in Section 3.1.5.3 (Mitigation Measure).

Although some cumulative projects in the surrounding area may be under construction at the same time as the proposed Program, the majority of these projects are not located within 0.25 mile of the Program site such that construction of these projects would not generate localized fugitive dust emissions that would impact the same sensitive receptors as those affected by Program construction. The Foothill Gold Line extension is currently under construction in the Program site vicinity with construction anticipated to be complete in 2025 (Foothill Gold Line 2023). Construction activities associated with this project could be occurring at the same time as construction of the Water Treatment Chemical Delivery Railroad Tracks Replacement project. However, construction activities for both the Foothill Gold Line and the Water Treatment Chemical Delivery Railroad Tracks Replacement project would be required to comply with SCAQMD Rule 403 to minimize localized fugitive dust generation. Furthermore, construction activities for both projects would be moving along their respective railroad track alignments and thus would have the potential to generate localized fugitive dust emissions affecting the same sensitive receptors only for a short period of time if construction activities for both projects occur simultaneously near the intersection of Arrow Highway and Wheeler Avenue. Therefore, cumulative impacts related to localized fugitive dust emissions would be **less than significant.**

As discussed under AQ-C, TAC emissions generated by Program construction activities would not exceed SCAQMD thresholds, which are designed to evaluate whether a project's incremental contribution to existing background cancer risk, cancer burden, and non-cancer chronic and acute risk would be cumulatively considerable. Therefore, the proposed Program's contribution to cumulative air quality impacts from construction related to TACs would **not be cumulatively considerable (less than significant).**

Cumulative Significance after Mitigation: Cumulative impacts related to regional ozone and particulate matter concentrations as well as localized TAC concentrations would be significant, and the proposed Program's contribution would **not be cumulatively considerable (less than significant).** Cumulative impacts related to localized fugitive dust emissions would be **less than significant.**

Operation

In accordance with CEQA Guidelines Section 15064(h)(3), SCAQMD's approach for assessing cumulative impacts related to criteria air pollutants is based on the AQMP forecasts of attainment of ambient air quality standards in accordance with the requirements of the federal and California Clean Air Acts. If a project's mass regional emissions or localized emissions do not exceed the applicable SCAQMD thresholds, then the project's criteria pollutant emissions would not be cumulatively considerable. The proposed Program would contribute emissions of the ozone precursors VOC and NO_X as well as particulate matter to the area during operation; however, Program emissions during operation would not exceed SCAQMD regional or localized significance thresholds. Therefore, the proposed Program's contribution to cumulative air quality impacts related to criteria air pollutants from operation would **not be cumulatively considerable (less than significant).**

Program operation would not result in new sources of TAC emissions. Therefore, the proposed Program's contribution to cumulative air quality impacts related to TACs during operation would **not be cumulatively considerable (less than significant).**

Cumulative Significance: Cumulative impacts related to regional ozone and particulate matter concentrations as well as localized TAC concentrations would be significant, and the proposed Program's contribution would **not be cumulatively considerable (less than significant).**

3.1.5.3 Mitigation Measure

Mitigation Measure AQ-1 Use of Low-VOC Architectural Coatings

> **AQ-1**. During the architectural coating phases of the Water Quality Laboratory Building Improvements, Administration and Control Buildings Seismic Upgrades and Building Improvements, New La Verne Warehouse Facilities, and New Field Engineering Building projects, the Construction Contractor(s) shall use "super-compliant" low VOC paints that have been reformulated to exceed the regulatory VOC limits put forth by SCAQMD's Rule 1113. Super-compliant low VOC paints shall have a VOC content no greater than 55 grams per liter.

Implementation of MM AQ-1 would result in a reduction in regional construction-related VOC emissions during Program construction as well as during the overlapping Program construction and operational phases through use of super-compliant architectural coatings during construction of the Administration and Control Buildings Seismic Upgrade and Building Improvements, New La Verne Warehouse Facilities, Water Quality Laboratory Building Improvements, and New Field Engineering Building projects. Table 13 shows the anticipated reduction in regional construction-related VOC emissions with implementation of MM AQ-1 for years 2026, 2028, and 2029. Table 14 shows the anticipated reduction in regional construction-related VOC emissions generated during overlapping construction and operational phases with implementation of MM AQ-1. As shown in Table 13 and Table 14, implementation of MM AQ-1 would reduce regional construction-related VOC emissions below the SCAQMD thresholds such that impacts would be **less than significant with mitigation incorporated**.

Table 13 Proposed Program Regional Construction Emissions with Implementation of MM AQ-1

	Maximum Daily Emissions (pounds per day)					
Construction Phase[1]	**VOC**	**NO_x**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
2026						
Administration and Control Buildings Seismic Upgrade and Building Improvements	46.8	24.8	55.4	0.1	5.7	1.5
New La Verne Warehouse Facilities						
Water Quality Laboratory Building Improvements						
2028						
Water Quality Laboratory Building Improvements	44.9	27.5	68.2	0.1	7.7	2.0
Basins Nos. 1 and 2 Rehabilitation						
New Field Engineering Building						
2029						
Basins Nos. 1 and 2 Rehabilitation	42.5	1.0	4.9	< 0.1	0.3	0.1
New Field Engineering Building						
Maximum Daily Emissions[2]	**47**	**28**	**68**	**< 1**	**8**	**2**

Construction Phase[1]	Maximum Daily Emissions (pounds per day)					
	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
SCAQMD Regional Significance Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

VOC = volatile organic compounds; NO_X = nitrogen oxides; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = particulate matter measuring 10 microns or less in diameter; $PM_{2.5}$ = particulate matter measuring 2.5 microns or less in diameter

[1] Mitigated emissions are only presented for years 2026, 2028, and 2029 because these are the years in which unmitigated emissions would exceed the SCAQMD regional significance thresholds.

[2] Maximum daily emissions would occur in 2028 with the exception of maximum daily VOC emissions, which would occur in 2026. Maximum daily emissions were rounded to the nearest whole number.

Source: Appendix B

Table 14 Combined Regional Construction and Operational Emissions with Implementation of MM AQ-1 (2027-2029)

Source	Maximum Daily Emissions (pounds per day)					
	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Maximum Construction Emissions (2028)[1]	44.9	27.5	68.2	0.2	7.7	2.0
Operational Emissions for New La Verne Warehouse Facilities	2.9	0.5	4.4	< 0.1	0.1	< 0.1
Construction Emissions + New La Verne Warehouse Facilities Operational Emissions[2]	47.8	29.0	72.6	0.2	7.8	2.0
Regional Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

VOC = volatile organic compounds; NO_X = nitrogen oxides; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = particulate matter measuring 10 microns or less in diameter; $PM_{2.5}$ = particulate matter measuring 2.5 microns or less in diameter.

[1] Between years 2027 and 2029, maximum daily construction emissions during concurrent operation of the New La Verne Warehouse Facilities and remaining Program construction activities would occur during year 2028. As a result, maximum daily construction emissions for year 2028 are utilized in this analysis.

[2] Combined maximum daily emissions were rounded to the nearest whole number.

Source: Appendix B

As noted in Section 3.1.5.2, *Cumulative Analysis*, if a project's mass regional emissions do not exceed the applicable SCAQMD thresholds, then the project's criteria pollutant emissions would not be cumulatively considerable. Implementation of MM AQ-1 would reduce the proposed Program's regional VOC emissions during construction and overlapping construction/operational phases to below the SCAQMD thresholds of significance. Therefore, because mitigated emissions would not exceed the applicable SCAQMD thresholds, which are set at the levels at which an individual project's contribution to cumulative air quality impact would not be cumulatively considerable the proposed Program's contribution to cumulative air quality impacts related to ozone would **not be cumulatively considerable (less than significant with mitigation incorporated).**

Significance after Mitigation: Less than significant

3.2 Cultural Resources

3.2.1 Introduction

This section describes the existing conditions and regulatory framework as they pertain to cultural resources and addresses the potential for implementation of the proposed Program to result in impacts to cultural resources. Cultural resources under CEQA include archaeological resources (both prehistoric and historic), built environment resources (including buildings, structures, and infrastructure), and human remains (including those interred outside of formal cemeteries). The analysis in this section is based on a Cultural Resources Technical Report prepared for the proposed Program in May 2023. This report is provided as Appendix D.

Cultural resources can include prehistoric and historic sites, structures, districts, and landscapes, or any other physical evidence associated with human activity considered important to a culture, a subculture, or a community for scientific, traditional, religious or any other reason. For the purposes of this analysis, cultural resources may be categorized into two groups: archaeological resources and built environment resources (including architectural/engineering resources).

Archaeological resources are places where human activity has measurably altered the earth or left deposits of physical remains. Archaeological resources may be either prehistoric-era (before European contact) or historic-era (after European contact). The majority of such places in California are associated with either Native American or Euro-American occupation of the area. The most frequently encountered prehistoric archaeological sites are village settlements; temporary camps where food and raw materials were collected; smaller, briefly occupied sites where tools were manufactured or repaired; and special-use areas like caves, rock shelters, and rock art sites. Historic-era archaeological sites may include ruins, such as building foundations or features such as privies, corrals, and trash dumps.

Built environment resources include buildings, structures, objects, districts, infrastructure, and landscapes of historic or aesthetic significance. They are generally 45 years of age or older. Built environment resources may be considered significant due to their association with an event, person, architecture, engineering, or culture of an area and must have the characteristics that make it a good representative of properties associated with that aspect of the past.

3.2.2 Existing Conditions

3.2.2.1 Natural and Cultural Setting

The proposed Program site lies in Los Angeles County at an approximate elevation of 329 meters (1,080 feet) above mean sea level. None of the surrounding area retains its natural setting; the Program site is located in a residential area characterized by a mix of single-family homes, apartment complexes, and institutional uses (e.g., schools, churches). According to published geologic mapping, the Program site vicinity is underlain by Quaternary age soils. The Program site also lies within the traditional territory of the Tongva/Gabrieleño. A detailed discussion of the natural and cultural setting of the Program site is provided in Appendix D.

3.2.2.2 History of the F.E. Weymouth Water Treatment Plant

The proposed Program site encompasses the Weymouth Plant, which constitutes an NRHP- and CRHR-eligible historic district. The following history of the Weymouth Plant is based on excerpts from Metropolitan's *Cultural Resource Treatment Plan for the Weymouth Water Treatment Plant Historic District* (CRTP) prepared in July 2016. A more detailed historical context provided in Appendix D:

> The Weymouth Treatment Plant, now the historic core of Metropolitan's La Verne Facility, was built as an element of the CRA, with construction beginning in 1939 and completed in 1941 on unincorporated Los Angeles County lands near La Verne. Upon completion, the CRA system pumped water 242 miles across the Mojave and Colorado deserts to Southern California. Originally referred to as the Metropolitan Water Softening and Filtration Plant, it was renamed Weymouth Water Treatment Plant in 1941 following the death of Metropolitan Chief Engineer Frank E. Weymouth shortly after the plant's opening. The land on which the Weymouth Plant was constructed, and neighboring properties was annexed by the City of La Verne in 1959.
>
> […]
>
> The Weymouth Plant was designed as an integral component of the CRA water delivery system infrastructure. Architecturally, early buildings of the plant illustrate the distinctive characteristics of monumental public architecture in the early years of the Great Depression in a primarily industrial setting. Unlike the monumental architecture of the CRA pumping plants, which were designed in a "stripped-down" or "starved" classical fashion, commonly associated with Works Progress Administration (WPA) Moderne buildings from this era, the buildings at Weymouth Plant were "flamboyant" in detail incorporating design influences of Moorish Spain, Greece, and Rome. To highlight this significance, the plant was designed as a showpiece and intended as a public space that was more easily accessible than the more remote pumping stations located in the heart of the Colorado and Mojave deserts, such as Eagle Mountain for example. The Weymouth Plant was expected to host 10,000 visitors annually. The Weymouth Plant was constructed by the Griffith Company of Los Angeles with a $3 million budget for completing the project. Daniel A. Elliott designed the buildings within the plant, in addition to other buildings associated with the CRA, including the buildings at each of the five desert pumping plants. At the Weymouth Plant, the initial construction included the Administration and Control Buildings, Water Softener Building No. 1, and Filter Building No. 1 and associated Basin Nos. 1 and 2. Specifically, the buildings were designed in the Spanish Colonial/Mission Revival style and were executed in cast concrete. Overall, the design referenced California's Spanish past in Elliot's use of the Mission and Spanish architectural elements and California's future by incorporating the modernistic design elements of Art Deco/Moderne. The buildings are richly detailed with elaborate entryways, distinctive tiles, and unique light fixtures, all of which reflect the nautical aspects of filtering and treating water. The filter buildings have broad banks of windows that flood the interiors with light, which connected the filtration basins with the operation center in Filter Building No. 1. Through their elaborate design and rich details, the buildings and structures located at Weymouth Plant reflect Metropolitan's prominent influence in water management for Southern California. These original buildings and structures were constructed on 20 acres of former citrus groves. The first delivery of water from the CRA arrived on June 8, 1941. Upon completion, the Weymouth Plant represented an important technological and architectural achievement for Metropolitan.
>
> Similar to other aspects of the CRA, expansion was incorporated into the design of the Weymouth Plant. Much like other components of the CRA such as the aqueduct being expanded to meet the demand for water, the Weymouth Plant was expanded in 1949, 1962, and 1966. The first plant expansion was underway by 1949 (Expansion 1) with the construction of the east wing

of Filter Building No. 1 and the addition of 12 more filter cells. By 1953, the site had grown to 70 acres and processed over 200 million gallons of water per day. James M. Montgomery, who had worked on the original engineering design of the plant in 1936, directed plant expansions in 1949 and again in 1962 (Expansion 2). Expansion 2 featured the construction of Filter Building No. 2; further expansion of the filter cells, addition of new mixing and settling basins (Basin Nos. 5–8); and construction of the Washwater Reclamation Plant No. 1. Construction associated with Expansion 2 was completed in 1962. In 1966, Expansion 3 added the Softener Building No. 3 and the Finished Water Reservoir.

[…]

The CRA water transport system, with all of its infrastructure, became a vast designed landscape through the desert eventually supplying approximately one-fourth of the water used in Southern California.

[…]

The CRA system infrastructure captured the interest of the American public during the Great Depression as reflected by a detailed description of progress made available in a monthly Metropolitan publication at the time.

3.2.2.3 Identification of Cultural Resources within the Program Site

Background and Archival Research

Background and archival research involved a review of materials related to the proposed Program (e.g., prior design reports, plans, and CEQA documents related to the Weymouth Plant); various primary and secondary source materials such as historical maps, aerial photographs, and written histories of the area; a California Historical Resources Information System (CHRIS) records search; and a Sacred Lands File (SLF) search.

On September 1, 2022, Rincon received the results of a CHRIS records search from the South Central Coastal Information Center, which was conducted to identify previously recorded cultural resources as well as cultural resources studies that have been conducted within the Program site and a 0.5-mile radius surrounding it. The CHRIS search and background/archival research identified no previously recorded resources within or adjacent to the Program site. The CHRIS records search and background/archival research identified 13 cultural resources within a 0.5-mile radius of the Program site, which are detailed in Appendix D.

On August 30, 2022, the Native American Heritage Commission (NAHC) provided the results of the SLF search request, stating the result of the SLF search was positive. However, the NAHC identifies sacred lands by quadrangle, and although the SLF results were positive, the SLF resources could exist anywhere within the *San Dimas, California* topographic quadrangle (Appendix D). The NAHC also provided a list of 15 tribes culturally affiliated with the geographic area in which the Program site is located. On December 5, 2022, Metropolitan sent letters via certified mail to the 15 NAHC-listed contacts requesting information regarding the presence of cultural resources in the vicinity of the Program site. Due to incorrect contact information being included on the letters to the 15 NAHC-listed Native American contacts, additional outreach letters were sent via certified mail on February 16, 2023 with the correct contact information. None of the 15 NAHC-listed contacts identified cultural resources on or within the vicinity of the Program site. Additional information regarding Native American tribal cultural resource consultation efforts is discussed further in Section 3.6, *Tribal Cultural Resources*.

Cultural Resources Survey and Historical Resource Evaluation

A cultural resources survey of the proposed Program site was conducted on July 13, 2022. The survey consisted of a reconnaissance-level survey of the entirety of the Weymouth Plant and an intensive-level survey of the buildings and structures proposed for alteration as part of the proposed Program. The exteriors of all buildings and structures proposed for alteration as part of the proposed Program were inspected and photographed, and field notes related to their condition, integrity, and character-defining features were taken. The conditions of the buildings and structures that contribute to the Historic District were noted to confirm they remain consistent with those observed at the time the CRTP was prepared. The field survey and associated background research confirmed the Weymouth Plant constitutes a historical resource and that the Historic District remains in a condition consistent with that observed at the time the CRTP was prepared in 2016. In concurrence with the CRTP, the field survey and research efforts confirmed the following buildings/structures contribute to the Historic District and are therefore considered historical resources pursuant to CEQA:

- Administration and Control Buildings
- Softener Building No. 1
- Softener Building No. 2
- Filter Building No. 1 and associated basin Nos. 1 through 24
- Filter Building No. 2 and associated basin Nos. 25 through 48
- Basin Nos. 1 through 4
- Basin Nos. 5 through 8
- Washwater Tank Nos. 1 and 2
- Rail Spur

The Central Stores Warehouse Building 30, Annex Building 31, Storage Buildings 32 and 32A, and Investment Recovery Building 33 were individually recorded during the site visit because the individual historical significance of these buildings/structures was not considered in the CRTP, and they are proposed for demolition or significant modification. In addition, the existing Field Engineering Building was individually recorded although no demolition or significant modifications are proposed. To confirm their potential individual historical resources eligibility, the Warehouse and Storage Buildings and the existing Field Engineering Building were recorded and evaluated for potential individual listing in the NRHP and CRHR on California Department of Parks and Recreation 523 Series forms. Based on this evaluation, the Cultural Resources Technical Report recommended the Warehouse and Storage Buildings and the existing Field Engineering Building ineligible for listing in the NRHP and the CRHR under any significance criteria (Appendix D).

During the site visit, areas of exposed ground surface within the Weymouth Plant were inspected and photographed to identify the presence of cultural materials. Particular attention was paid to the areas where ground disturbance would occur under the proposed Program. Photographs taken during the survey were later reviewed to confirm field observations. During the survey, the Program site was noted as being highly developed with paved, graded, and graveled surfaces and buildings and infrastructure that comprise the Weymouth Plant. Due to the developed nature of the site, visibility of the remaining exposed soils was relatively poor, at approximately 10 to 20 percent. Exposed surfaces are limited and scattered throughout the plant and include the areas immediately surrounding the Water Quality Laboratory Building and around the perimeter of the plant. Vegetation includes mature trees along the plant perimeter and developed landscaping throughout the plant, concentrated in areas immediately surrounding buildings. The plant was observed as being heavily disturbed from construction and maintenance activities over several decades. A large compacted and graveled area, which appears to be primarily comprised of imported materials, was observed in the southeastern

portion of the plant. In this area, recently deposited debris, such as nails and fragmented buildings materials including scraps of metal and wood, were identified on the surface. No archaeological resources were identified during the field survey (Appendix D).

3.2.3 Regulatory Framework

This section describes the plans, policies, and regulations related to cultural resources that are applicable to the proposed Program.

3.2.3.1 Federal

National Register of Historic Places

The NRHP was authorized by Section 101 of the National Historic Preservation Act and is the nation's official list of cultural resources worthy of preservation. The NRHP recognizes the quality of significance in American, state, and local history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects. Per 36 Code of Federal Regulations Part 60.4, a property is eligible for listing in the NRHP if it meets one or more of the following criteria (Appendix D):

Criterion A Is associated with events that have made a significant contribution to the broad patterns of our history

Criterion B Is associated with the lives of persons significant in our past

Criterion C Embodies the distinctive characteristics of a type, period, or method of installation, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction

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

In addition to meeting at least one of the above designation criteria, resources must also retain integrity. The National Park Service recognizes seven aspects or qualities that, considered together, define historic integrity. To retain integrity, a property must possess several, if not all, of these seven qualities, defined as follows (Appendix D):

Location The place where the historic property was constructed or the place where the historic event occurred.

Design The combination of elements that create the form, plan, space, structure, and style of a property

Setting The physical environment of a historic property

Materials The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property

Workmanship The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory

Feeling A property's expression of the aesthetic or historic sense of a particular period of time

Association The direct link between an important historic event or person and a historic property

Certain properties are generally considered ineligible for listing in the NRHP, including cemeteries, birthplaces, graves of historical figures, properties owned by religious institutions, relocated structures, or commemorative properties. Additionally, a property must be at least 50 years of age to be eligible for listing in the NRHP. The National Park Service states 50 years is the general estimate of the time needed to develop the necessary historical perspective to evaluate significance. Properties less than 50 years in age must be determined to have "exceptional importance" to be considered eligible for NRHP listing (Appendix D).

3.2.3.2 State

California Environmental Quality Act

CEQA requires a lead agency determine whether a project could have a significant effect on historical resources and archaeological resources. A historical resource is a resource listed in or determined to be eligible for listing in the CRHR (CEQA Guidelines Section 15064.5[a][1]), a resource included in a local register of historical resources (CEQA Guidelines Section 15064.5[a][2]), or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (CEQA Guidelines Section 15064.5[a][3]). Other relevant provisions of CEQA and the CEQA Guidelines with regard to cultural resources include the following:

- **CEQA Guidelines Section 15064.5(a)(4).** The fact that a resource is not listed in or determined to be eligible for listing in the CRHR, not included in a local register of historical resources (pursuant to PRC Section 5020.1[k]), or identified in an historical resources survey (meeting the criteria in PRC Section 5024.1[g]) does not preclude a lead agency from determining that the resource may be an historical resource as defined in PRC Sections 5020.1(j) or 5024.1.
- **CEQA Guidelines Section 15064.5(b).** A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. A substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired. The significance of an historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the CRHR, a local register of historical resources, or a historical resources survey meeting the requirements of PRC Section 5024.1(g). Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Secretary's Standards) shall be considered as mitigated to a level of less than a significant impact on the historical resource.
- **PRC Section 21083.2.** The lead agency shall determine whether the project may have a significant effect on archaeological resources. If the lead agency determines the project may have a significant effect on unique archaeological resources, the EIR shall address the issue of those resources. An EIR, if otherwise necessary, shall not address the issue of nonunique archaeological resources. If a project can be demonstrated to cause damage to a unique archaeological resource, the lead agency may require reasonable efforts to permit any or all of

these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required. A unique archaeological resource is defined as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it does one or more of the following:

- Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information
- Has a special and particular quality such as being the oldest of its type or the best available example of its type
- Is directly associated with a scientifically recognized important prehistoric or historic event or person

California Register of Historical Resources

The CRHR was established in 1992 and codified by PRC Section 5024.1 and Title 14 California Code of Regulations Section 4852. The CRHR is an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the state and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change (PRC Section 5024.1[a]). The criteria for CRHR eligibility are consistent with the NRHP criteria but have been modified for state use in order to include a range of historical resources that better reflect the history of California (PRC Section 5024.1[b-c]). However, unlike the NRHP, the CRHR does not have a defined age threshold for eligibility; rather, a resource may be eligible for the CRHR if it can be demonstrated sufficient time has passed to understand its historical or architectural significance. Furthermore, resources may still be eligible for listing in the CRHR even if they do not retain sufficient integrity for NRHP eligibility. Generally, the California Office of Historic Preservation recommends resources over 45 years of age be recorded and evaluated for historical resources eligibility (Appendix D).

A property is eligible for listing in the CRHR if it meets one of more of the following criteria (Appendix D):

Criterion 1 Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage

Criterion 2 Is associated with the lives of persons important to our past

Criterion 3 Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values

Criterion 4 Has yielded, or may be likely to yield, information important in prehistory or history

California Health and Safety Code Section 7050.5

California Health and Safety Code Section 7050.5 states in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the remains are discovered has determined if the remains are subject to the Coroner's authority. If the human remains are of Native American origin, the coroner must notify the NAHC within 24 hours of this identification.

California Public Resources Code Section 5097.98

PRC Section 5097.98 states the NAHC, upon notification of the discovery of Native American human remains pursuant to California Health and Safety Code Section 7050.5, shall immediately notify those persons that it believes to be descended from the deceased (i.e., the Most Likely Descendant [MLD]). With permission of the landowner or a designated representative, the MLD may inspect the remains and any associated cultural materials and make recommendations for treatment or disposition of the remains and associated grave goods. The MLD shall provide recommendations or preferences for treatment of the remains and associated cultural materials within 48 hours of being granted access to the site.

3.2.3.3 Local

Metropolitan's Cultural Resources Treatment Plan for the Weymouth Water Treatment Plant Historic District

Metropolitan prepared a CRTP in July 2016 that discusses the significance and eligibility of the Weymouth Water Treatment Plant Historic District ("Historic District") in detail, identifying its boundaries, contributing and non-contributing elements, and the character-defining features of the Historic District and its contributors. According to the CRTP, the Weymouth Plant constitutes the Weymouth Water Treatment Plant Historic District. The Historic District derives its primary historical significance from its role as an integral component of the CRA water distribution system. This Historic District is also significant for its association with its namesake, Frank E. Weymouth, who served as General Manager and Chief Engineer for Metropolitan and oversaw the completion of the CRA system. Additionally, the Historic District embodies the distinctive characteristics of the Spanish Colonial/Mission Revival style of architecture, which possesses high artistic value and is therefore significant for its architectural value. The period of significance associated with the Historic District spans from 1941 to 1972, which corresponds to the period during which water delivered by the CRA was the sole supply of water treated at the Weymouth Plant (Metropolitan 2016).

The Historic District boundary includes "the legal parcels that comprise the current footprint of the La Verne Facility because this provides a buffer from neighboring residential thus maintaining consistency in the historic setting of the plant" (Metropolitan 2016). Contributing resources to the Historic District, as identified by the CRTP, include the following: Administration and Control Buildings, Softener Buildings No.1 and 2, Basin Nos. 1 through 8, Filter Building No. 1 and associated basins, Filter Building No. 2 and associated basins, Washwater Tank Nos. 1 and 2, and Washwater Reclamation Plant No. 1. The CRTP defines the character-defining features of the property overall in addition to identifying the character-defining features of the individual district contributors. Character-defining features are ranked by their level of significance and identified as most significant, significant, less significant, historic fabric but not a character-defining feature, and not historic fabric and not a character-defining feature (Metropolitan 2016).

In addition, the CRTP addressed the archaeological sensitivity of the Weymouth Plant. The CRTP's report included a CHRIS search, a SLF search, and combined pedestrian/windshield survey of the Weymouth Plant. None of these efforts resulted in the identification of archaeological resources within the plant. The study also noted that "due to decades of past site construction activities and trenched pipeline installation, the presence of intact buried cultural resources is highly unlikely" (Metropolitan 2016).

City of La Verne General Plan

Although the City does not have a historic preservation ordinance with outlined criteria for local designation, the La Verne City Council can designate historic landmarks through council resolution. The City's General Plan, which was adopted in 2018, includes goals and policies relating to cultural resources and indicates the Weymouth Plant is a designated City Landmark. Goals and policies related to cultural resources are outlined in the City's General Plan Cultural Resources Element (City of La Verne 1998).

La Verne Municipal Code

La Verne Municipal Code Section 15.04.010 includes adoption of the County of Los Angeles Building Codes by reference for the city. The County of Los Angeles Building Code includes stipulations for historic buildings that could be applied if Metropolitan obtains a building permit from the City for modifications to historic structures not directly involved in water treatment.

3.2.4 Thresholds and Methodology

3.2.4.1 Thresholds of Significance

Table 15 lists thresholds from Appendix G of the CEQA Guidelines that pertain to impacts associated with cultural resources, which are addressed in the Draft PEIR. It was determined in the NOP/Initial Study (Appendix A) that implementation of the proposed Program would have a less-than-significant impact related to human remains. Therefore, no further analysis of threshold (c) is included in the Draft PEIR.

Table 15 CEQA Thresholds for Cultural Resources

Threshold Would the proposed Program:
a. Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?
b. Cause a substantial adverse change in the significance of an archaeological resource as defined in CEQA Guidelines Section 15064.5?
c. Disturb any human remains, including those interred outside of formal cemeteries?

3.2.4.2 Methodology

The analysis in this section is based on a Cultural Resources Technical Report prepared for the proposed Program in May 2023 (Appendix D). The Cultural Resources Technical Report was prepared primarily based on background research conducted from May 2022 to October 2022, archival research conducted from July 2022 to September 2022, the results of a CHRIS records search received on September 1, 2022, the results of an SLF search received on August 30, 2022, and a field survey conducted on July 13, 2022. The following impact analysis summarizes the findings of the Cultural Resources Technical Report and provides mitigation measures pursuant to the recommendations made within the Cultural Resources Technical Report (Appendix D).

3.2.5 Impacts Analysis

3.2.5.1 Program Analysis

Threshold CUL-A: *Would the proposed Program cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?*

As indicated in the Cultural Resources Technical Report (Appendix D), the proposed Program site encompasses the Weymouth Water Treatment Plant Historic District, which remains an NRHP- and CRHR-eligible historic district. As confirmed in the Cultural Resources Technical Report (Appendix D), the following are the contributing elements to the Historic District:

- Administration and Control Buildings
- Softener Building No. 1
- Softener Building No. 2
- Filter Building No. 1 and associated basin Nos. 1 through 24
- Filter Building No. 2, and associated basin Nos. 25 through 48
- Basin Nos. 1 through 4
- Basin Nos. 5 through 8
- Washwater Tank Nos. 1 and 2
- Rail Spur

The contributing buildings and character-defining features of the Historic District remain consistent as presented in the CRTP (Appendix D). With regard to the Rail Spur, the historical significance of only the portion sited within the Weymouth Plant is discussed in the CRTP. However, due to the consistent developmental history of the entirety of the Rail Spur, including the portion extending beyond the boundaries of the Weymouth Plant, the Cultural Resources Technical Report indicates that the whole of the Rail Spur is a contributing element to the Historic District (Appendix D).

The Cultural Resources Technical Report also confirmed certain buildings and features identified as non-contributing to the Historic District remain as non-contributing, and none of these buildings or features possess individually significant associations that would qualify them for individual historical resources eligibility under CEQA. Those ineligible buildings and structures proposed for significant modification or demolition under the proposed Program include the Warehouse and Storage Buildings (inclusive of Warehouse Building 30, Annex Building 31, Storage Buildings 32 and 32A, and Investment Recovery Building 33).

Table 16 provides a summary of the findings from Cultural Resources Technical Report pertaining to the potential for the proposed Program to cause a substantial adverse change in the significance of a historical resource. As shown therein and discussed further in the following sections, the Administration and Control Buildings Seismic Upgrade and Building Improvements project and Basin Nos. 1 and 2 Rehabilitation project would result in potentially significant impacts to historical resources under CEQA. (All other projects would result in less-than-significant impacts to historical resources.) Therefore, implementation of MM CUL-1(a) and MM CUL-1(b) (detailed in Section 3.2.5.3 [Mitigation Measures]) would be required for the Administration and Control Buildings Seismic Upgrade and Building Improvements project and the Basin Nos. 1 and 2 Rehabilitation project. Further information on how these measures would reduce impacts to less than significant can be found in Section 3.2.5.3 (Mitigation Measures).

Table 16 Summary of Historical Resources Impacts by Project

Project	Building/Structures Proposed for Alteration	Historical Resources Status of Buildings/Structures Proposed for Alteration	Level of Impact to Historical Resources
Administration and Control Buildings Seismic Upgrade and Building Improvements	Modifications to the Administration and Control buildings	Contributor to an NRHP/CRHR-eligible historic district; considered a historical resource under CEQA	Potentially Significant
Basin Nos. 1 and 2 Rehabilitation	Modifications to Basins Nos. 1 and 2	Contributor to an NRHP/CRHR-eligible historic district; considered a historical resource under CEQA	Potentially Significant
Water Quality Laboratory Building Improvements	Modifications to the existing Water Quality Laboratory Building	Ineligible for historical resources designation; not considered a historical resource under CEQA; within boundaries of Historic District	Less than Significant
Water Treatment Chemical Delivery Railroad Tracks Replacement	Replacement of the Rail Spur	Contributor to an NRHP/CRHR-eligible historic district; considered a historical resource under CEQA	Less than Significant
New La Verne Warehouse Facilities	Demolition of existing warehouse and storage building Partial removal of the southern Rail Spur	Ineligible for historical resources designation; not considered a historical resource under CEQA; within boundaries of Historic District Contributor to an NRHP/CRHR-eligible historic district; considered a historical resource under CEQA	Less than Significant
New Field Engineering Building	Repurposing of the existing Field Engineering Building for non-occupancy use	Ineligible for historical resources designation; not considered a historical resource under CEQA; within boundaries of Historic District	Less than Significant

NRHP = National Register of Historic Places; CRHR = California Register of Historic Places; CEQA = California Environmental Quality Act
Source: Appendix D

Administration and Control Buildings Seismic Upgrade and Building Improvements Project

The Administration and Control Buildings Seismic Upgrade and Building Improvements project would alter the Administration and Control buildings, both of which are identified as contributing resources to the Historic District and therefore qualify as historical resources pursuant to CEQA. The project largely complies with the Secretary's Standards because many of the proposed project elements would not affect the character-defining features of the Administration and Control Buildings or significantly alter their overall historic character. However, despite this general compliance, specific components of the project could potentially alter the character-defining features of the Administration and Control buildings and therefore also have the potential to result in material impairment and significant impacts to the Historic District. These components include the following (Appendix D):

- Retrofit existing caisson footings by adding micropiles
- Strengthen existing concrete walls, slabs, ceilings, and steel roof framing
- Add new interior shear walls at select locations
- Reconfigure office spaces and conference rooms, including relocating the water quality laboratory space to the Control building
- Add usable area by demolishing non-influent conduits and configuring the water quality laboratory space
- Add ADA and California Building Code-compliant accessible restrooms and showers
- Relocate current break room to a current office space area

Therefore, implementation of the Administration and Control Buildings Seismic Upgrade and Building Improvements project has the potential to result in the material impairment of the Administration and Control buildings and therefore the potential to cause a substantial adverse change in the significance of a historical resource. Therefore, without mitigation, impacts to the Administration and Control buildings would be **significant**. MM CUL-1(a) and MM CUL-1(b) (detailed in Section 3.2.5.3 [Mitigation Measures]), which involve consultation with a historical architect and documentation of the Administration and Control Buildings, would be required. Further information on how these measures would reduce impacts to less than significant can be found in Section 3.2.5.3 (Mitigation Measures).

Significance after Mitigation: Less than Significant

Basin Nos. 1 and 2 Rehabilitation Project

Basin Nos. 1 and 2 are identified as contributing resources to the Historic District and therefore qualify as historical resources pursuant to CEQA (Appendix D). The Basin Nos. 1 and 2 Rehabilitation project includes two rehabilitation options. Option 1 would involve the replacement of existing basin components while retaining the current basin layout configuration. All of the interior components that would be replaced or refurbished are identified in the CRTP as non-character-defining or less character-defining. However, the CRTP identifies the existing handrails and light posts as character-defining features (Appendix D). Option 1 would replace these character-defining features and therefore would have the potential to cause a substantial adverse change in the significance of a historical resource. Therefore, without mitigation, impacts to Basin Nos. 1 and 2 from Option 1 would be **significant**. MM CUL-1(a) and MM CUL-1(b) (detailed in Section 3.2.5.3 [Mitigation Measure]), which involve consultation with a historical architect and documentation of Basin Nos. 1 and 2, would be required. Further information on how these measures would reduce impacts to less than significant can be found in Section 3.2.5.3 (Mitigation Measures).

Option 2 of the Basin Nos. 1 and 2 Rehabilitation project would involve demolition and removal of the existing square configuration of the basins and conversion to a rectangular configuration; replacement of the drop gates and gate guides, baffle walls and paddle wheel boards, and flocculator drive shaft assemblage; and replacement of launder troughs, sludge rake mechanisms, hand rails, utilities, and mechanical and electrical equipment (i.e., light poles, control panels, lighting panels, junction boxes, conduits). Option 2 would alter or replace significant and most significant character-defining features of Basin Nos. 1 and 2 and modify via seismic stabilization the basins themselves, which are most significant character-defining features in their own right, as identified in the CRTP. As a result, Option 2 would result in a substantial adverse change in the significance of a historical resource. Therefore, without mitigation, impacts to Basin Nos. 1 and 2 from Option 2 would be **significant**. MM CUL-1(a) and MM CUL-1(b) (detailed in Section 3.2.5.3 [Mitigation Measures]), which involve consultation with a historical architect and documentation of Basin Nos. 1 and 2, would be required. Further information on how these measures would reduce impacts to less than significant can be found in Section 3.2.5.3 (Mitigation Measures).

Significance after Mitigation: Less than Significant

Water Quality Laboratory Building Improvements Project

The Water Quality Laboratory Building Improvements project encompasses the retrofit of the existing Water Quality Laboratory Building, which was constructed in 1985. The Water Quality Laboratory building does not meet the minimum age generally required to qualify for historical resources eligibility and is not of exceptional importance such that it would meet NRHP Criteria Consideration G for properties achieving significance within the past 50 years (Appendix D). Therefore, the Water Quality Laboratory building is not considered a historical resource pursuant to

CEQA, and implementation of the Water Quality Laboratory Building Improvements project would not have the potential to result in substantial adverse impacts to an individual historical resource. Furthermore, although the Water Quality Laboratory is located within the boundaries of the Historic District, the project would not substantially impact the Historic District because the proposed modifications to the Water Quality Laboratory building would not substantially alter a Historic District contributor and the proposed building addition is not located near any Historic District contributors (Appendix D). Therefore, the Water Quality Laboratory Building Improvements project would not cause a substantial adverse change in the significance of a historical resource, and impacts would be **less than significant**.

Significance: Less than Significant

Water Treatment Chemical Delivery Railroad Tracks Replacement

The Water Treatment Chemical Delivery Railroad Tracks Replacement project consists of the replacement of the existing Rail Spur, which is located within and extends beyond the boundaries of the Weymouth Plant, in its current location using similar materials. The Weymouth Plant's existing Rail Spur is identified in the CRTP as a contributing element to the Historic District. This project would replace the northern portion of the existing Rail Spur, which is identified in the CRTP as a contributing element to the Historic District. However, the CRTP notes the materials comprising the Rail Spur such as steel rails, wood ties, and ballast have been continually replaced over time such that they are not considered historic or character-defining features. As such, this project would not alter any character-defining features of the Rail Spur, and the Rail Spur would maintain its current alignment and configuration (Appendix D). Therefore, the Water Treatment Chemical Delivery Railroad Tracks Replacement project would not cause a substantial adverse change in the significance of a historical resource, and impacts would be **less than significant**.

Significance: Less than Significant

New La Verne Warehouse Facilities

The New La Verne Warehouse Facilities project would result in the demolition and replacement of Central Stores Warehouse Building 30 and Annex Building 31, and upgrade of Storage Buildings 32 and 32A as well as Investment Recovery Building 33. All five buildings (30, 31, 32, 32A, and 33) were recommended ineligible for individual listing in the NRHP and CRHR and are therefore not considered historical resources pursuant to CEQA. Therefore, the modification and/or demolition of these buildings in accordance with the New La Verne Warehouse Facilities project would not result in a substantial adverse change to a historical resource. In addition, the New La Verne Warehouse Facilities building would be designed in conformance with Metropolitan's Architectural Design Standards (sand colored precast concrete construction) at a maximum height of 35 feet, and the location of the proposed building is not in proximity to any Historic District contributors such that the significance of the Historic District would be substantially altered (Appendix D).

The New La Verne Warehouse Facilities project would also remove the existing Southern Rail Spur. As part of the plant's existing Rail Spur, the Southern Rail Spur is identified in the CRTP as a contributing element to the Historic District. However, CRTP notes the materials comprising the Rail Spur such as steel rails, wood ties, and ballast have been continually replaced over time such that they are not considered historic or character-defining features. While the CRTP does not identify any character-defining features of the Rail Spur, it notes that the Rail Spur route largely follows its original alignment. The New La Verne Warehouse Facilities would result in the removal of only a portion of the contributing Rail Spur, and following project implementation, the portion of the Rail Spur that would not be removed or altered would remain in place and active. As such, the remaining portion of the Rail Spur would continue to be identified as a contributing element to the Historic

District such that the significance of the Historic District would not be substantially altered (Appendix D).

Based on the analysis above, the New La Verne Warehouse Facilities would not result in a substantial adverse change in the significance of a historical resource, and impacts would be **less than significant**.

Significance: Less than Significant

New Field Engineering Building

The New Field Engineering Building project would result in the construction of a new Field Engineering Building and the re-purposing of the existing Field Engineering Building for non-occupancy use. The existing Field Engineering Building was recommended ineligible for individual listing in the NRHP and CRHR and is therefore not considered a historical resource pursuant to CEQA (Appendix D). As a result, modification of the existing Field Engineering Building would not cause a substantial adverse change in the significance of a historical resource. The new Field Engineering Building is located within the boundaries of the Historic District; however, the location of the new Field Engineering Building is not in proximity to Historic District contributors such that the new Field Engineering Building would result in substantial adverse changes in the significance of the Historic District (Appendix D). Therefore, the New Field Engineering Building project would not result in a substantial adverse change in the significance of a historical resource, and impacts would be **less than significant**.

Significance: Less than Significant

Threshold CUL-B: *Would the proposed Program cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?*

No archaeological resources were identified within the Program site during preparation of the Cultural Resources Technical Report, including background/archival research and the field survey. All documents reviewed noted the Weymouth Plant has experienced a high level of prior disturbance (Appendix D). Accordingly, the potential to encounter archaeological resources at the Program site is low. Furthermore, if unanticipated archaeological resources are encountered during construction activities, the project contractor(s) would be required to comply with Metropolitan standard practices related to the protection of archaeological resources as outlined in Section 01065 of the construction contractor specifications (see Section 2.6, *Construction Characteristics*). Adherence to Metropolitan's standard practices in the unlikely event of unanticipated discovery of an archaeological resource would result in the implementation of standard procedures to avoid substantial damage to the archaeological resource. Therefore, the proposed Program would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5, and impacts would be **less than significant**.

Significance: Less than Significant

3.2.5.2 Cumulative Analysis

Cumulative impacts consider impacts at the Program site together with similar impacts of existing development and reasonably anticipated projects in the Program site vicinity. The general approach to cumulative impact analysis used in this Draft PEIR is discussed in Section 3, *Environmental Impact Analysis and Mitigation Measures*, and cumulative projects are listed in Table 4 of this section. The

geographic scope of this resource area consists of the Weymouth Plant and immediate surrounding areas.

The Weymouth Plant continues to be an NRHP- and CRHR-eligible historic district, as confirmed during preparation of the Cultural Resources Technical Report, meaning that prior development within the Weymouth Plant and existing surrounding development has not caused cumulative impacts to this historical resource (Appendix D). The only cumulative project located in the immediate vicinity of the Weymouth Plant is Pure Water Southern California, which may involve minor modifications to the Weymouth Plant to enable the connection of the proposed conveyance and distribution facilities to the existing Weymouth Plant treatment facilities. These modifications likely would not require direct impacts to structures within the Weymouth Plant, and any indirect effects due to the introduction of new aboveground facilities would be minor. Furthermore, a separate PEIR is being prepared for Pure Water Southern California, which will include mitigation measures to address potentially significant impacts to historical resources, if any are identified. Therefore, the proposed Program does not have the potential to combine with the effects of past, current, and probable future projects to result in cumulative impacts to historical resources. As a result, cumulative impacts to historical resources would be **less than significant.**

Cumulative development could increase ground disturbing activities within the city, which could contribute to cumulative effects on existing archaeological resources and increase the likelihood of encountering previously undiscovered archaeological resources. However, the city is largely built out and like the Weymouth Plant, has been subject to previous ground-disturbing activities associated with construction activities. If unanticipated archaeological resources are discovered during construction of cumulative projects, the contractor(s) would be required to comply with all applicable federal, state, and local regulations governing the treatment of these resources. Accordingly, cumulative impacts to archaeological resources would be **less than significant.**

Cumulative Significance: Cumulative impacts to historical and archaeological resources would be **less than significant.**

3.2.5.3 Mitigation Measures

Implementation of MM CUL-1(a) and MM CUL-1(b) would be required for the proposed Program. In addition to these mitigation measures, the project contractor(s) would be required to comply with Metropolitan standard practices related to the protection of archaeological resources as outlined in Section 01065 of the construction contractor specifications.

Mitigation Measure CUL-1(a) Consultation with Historical Architect

CUL-1(a). During the design and construction phases of the Administration and Control Buildings Seismic Upgrade and Building Improvements Project and the Basin Nos. 1 and 2 Rehabilitation project, Metropolitan shall secure the services of a historical architect meeting the Secretary of the Interior's professional qualifications standards for historic architecture (36 Code of Federal Regulations Part 61) for consultation. The historical architect shall review design plans for both projects at key points during the design and construction phases and shall make recommendations to retain as many character-defining features, as practicable, and achieve project compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties. The recommendations of the historical architect shall be integrated into project design and implemented to the greatest extent feasible.

Mitigation Measure CUL-1(b) Documentation

> **CUL-1(b)**. Prior to the start of construction activities for the Administration and Control Buildings Seismic Upgrade and Building Improvements project and the Basin Nos. 1 and 2 Rehabilitation project, Metropolitan shall document the Administration and Control buildings and Basin Nos. 1 and 2 in accordance with documentation standards outlined in the *Cultural Resource Treatment Plan for the Weymouth Water Treatment Plant Historic District* (2016).

Implementation of MM CUL-1(a) would require that design plans for the Administration and Control Buildings Seismic Upgrade and Building Improvements project and the Basin Nos. 1 and 2 Rehabilitation project be reviewed by a professional that meets the Secretary of the Interior's professional qualifications standards for historic architecture with integration and implementation of the recommendations of the historical architect to the greatest extent feasible. Implementation of MM CUL-1(b) would require Metropolitan to document the Administration and Control buildings and Basin Nos. 1 and 2 in accordance with the standards of the *Cultural Resource Treatment Plan for the Weymouth Water Treatment Plant Historic District* (2016). As a result, the Administration and Control Buildings Seismic Upgrade and Building Improvements project and the Basin Nos. 1 and 2 Rehabilitation project would remain contributors to the Weymouth Water Treatment Plant Historic District, and the Historic District would remain eligible for the NRHP and CRHR. With implementation of MM CUL-1(a) and MM CUL-1(b), the proposed Program would not result in a substantial adverse change in the significance of a historical resource, and impacts would be **less than significant with mitigation incorporated.**

Significance after Mitigation: Less than Significant

3.3 Greenhouse Gas Emissions

3.3.1 Introduction

This section describes the existing conditions, regulatory framework, and potential impacts related to greenhouse gas (GHG) emissions and global climate change that would result from the proposed Program. The analysis of GHG emissions is based primarily on the Air Quality and Greenhouse Gas Report prepared by Entech Consulting Group in April 2023. The Air Quality and Greenhouse Gas Report is provided as Appendix B to the Draft PEIR.

3.3.2 Existing Conditions

Climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period. Climate change is the result of numerous, cumulative sources of GHG emissions contributing to the "greenhouse effect," a natural occurrence that takes place in Earth's atmosphere and helps regulate the temperature of the planet. GHG emissions occur both naturally and as a result of human activities, such as fossil fuel burning, decomposition of landfill wastes, raising livestock, deforestation, and some agricultural practices. GHGs produced by human activities include the following (USEPA 2023):

- **Carbon Dioxide (CO_2).** Carbon dioxide is the primary form in which carbon exists in the atmosphere and is produced primarily by fossil fuel combustion, forest clearing, biomass burning, and some non-energy production processes, such as cement production.
- **Methane.** Methane is a hydrocarbon that is a primary component of natural gas. Methane emissions are generated by the anaerobic decomposition of organic matter in biological systems and is generated mainly by agricultural activities (e.g., rice cultivation, enteric fermentation in animals, decomposition of animal wastes), decomposition of municipal solid wastes, wastewater treatment, production and distribution of natural gas and petroleum, incomplete fossil fuel combustion, and coal mining.
- **Nitrous Oxide.** Nitrous oxide is a compound released primarily by agricultural soils (due to the application of fertilizers, manure deposition, and production of nitrogen-fixing crops), fossil fuel combustion, wastewater treatment, waste incineration, and biomass burning.
- **Hydrofluorocarbons.** Hydrofluorocarbons are primarily used as replacements for ozone-depleting substances in refrigeration, air conditions, insulating foams, and aerosol propellants and are emitted through wear, faulty maintenance, and/or leakage over the lifetime of these products.
- **Perfluorocarbons and Sulfur Hexafluoride.** Perfluorocarbons and sulfur hexafluoride are emitted primarily by industrial processes such as aluminum smelting, semiconductor manufacturing, electric power transmission and distribution, and magnesium casting.

Different types of GHGs have varying global warming potentials. The global warming potential of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emitted, referred to as

"carbon dioxide equivalent" (CO_2e), which is the amount of GHG emitted multiplied by its global warming potential. Carbon dioxide has a 100-year global warming potential of one. By contrast, methane has a global warming potential of 30, meaning its global warming effect is 30 times greater than CO_2 on a molecule per molecule basis (Intergovernmental Panel on Climate Change [IPCC] 2021).[8]

Anthropogenic activities since the beginning of the industrial revolution (approximately 250 years ago) are adding to the natural greenhouse effect by increasing the concentration of GHGs in the atmosphere that trap heat. Since the late 1700s, estimated concentrations of CO_2, methane, and nitrous oxide in the atmosphere have increased by over 43 percent, 156 percent, and 17 percent, respectively, primarily due to human activity (USEPA 2022). Emissions resulting from human activities are thereby contributing to an average increase in Earth's temperature. Potential climate change impacts in California may include loss of snowpack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years (State of California 2018). For additional background information and context on GHG emissions and climate change, refer to Appendix B.

3.3.3 Regulatory Framework

This section describes the plans, policies, and regulations related to GHG emissions that are applicable to the proposed Program. A more detailed discussion of the regulatory framework pertaining to GHG emissions is provided in Appendix B.

3.3.3.1 Federal

Federal Clean Air Act

The federal Clean Air Act does not specifically regulate GHG emissions; however, the United States Supreme Court (*Massachusetts v. U.S. Environmental Protection Agency, et al.*, 549 U.S. 497 – 2007) determined that GHGs are pollutants that can be regulated under the federal Clean Air Act. Currently, there are no federal regulations that set ambient standards for GHGs.

3.3.3.2 State

Legislation and Executive Orders

California continues to lead the global effort of mitigating and adapting to climate change through progressive legislative and executive direction. Such actions have established a series of increasingly stringent GHG emissions reduction goals and targets intended to help reduce and reverse the effects of global climate change. These goals and targets include the following:

- **Senate Bill (SB) 32.** SB 32 serves as an update to the emissions reduction target codified under AB 32. Signed into law in 2016, SB 32 establishes a statewide emissions reduction target of 40 percent below 1990 levels by 2030.
- **Executive Order (EO) B-55-18.** On September 10, 2018, the governor issued EO B-55-18, which established a new statewide goal of achieving carbon neutrality by 2045 and maintaining net negative emissions thereafter.

[8] The IPCC's (2021) *Sixth Assessment Report* determined that methane has a GWP of 30. However, the 2017 Climate Change Scoping Plan published by the California Air Resources Board uses a GWP of 25 for methane, consistent with the IPCC's (2007) *Fourth Assessment Report*. Therefore, this analysis utilizes a GWP of 25.

- **AB 1279**. Signed into law in 2022, AB 1279 declares the policy of the State both to achieve net zero GHG emissions as soon as possible, but no later than 2045, and achieve and maintain net negative GHG emissions thereafter and to ensure that by 2045, statewide anthropogenic GHG emissions are reduced to at least 85 percent below the 1990 levels.

CARB 2022 Scoping Plan

On December 15, 2022, CARB adopted the 2022 Scoping Plan. The 2022 Scoping Plan sets a target of reducing emissions to 85 percent below 1990 levels by 2045 and outlines a technologically feasible, cost-effective, and equity-focused path to achieve carbon neutrality by 2045. As with previous Scoping Plans, the 2022 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends local governments implement climate strategies consistent with the 2022 Scoping Plan Appendix D: Local Actions (CARB 2022). The 2022 Scoping Plan also assesses the progress the State is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan.

CEQA Guidelines Requirements for Climate Action Plan

CEQA Guidelines Section 15183.5(b)(1) states public agencies may choose to analyze and mitigate significant GHG emissions in a plan for the reduction of GHG emissions or similar document. A plan to reduce GHG emissions may be used in a cumulative impacts analysis. Pursuant to CEQA Guidelines Sections 15064(h)(3) and 15130(d), a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted plan or mitigation program under specified circumstances. The plan for the reduction of GHG emissions should:

- Quantify GHG emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;
- Establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable;
- Identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area;
- Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;
- Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels; and
- Be adopted in a public process following environmental review.

CEQA Guidelines Section 15183.5(b)(2) states a plan for the reduction of GHG emissions, once adopted following certification of an EIR or adoption of an environmental document, may be used in the cumulative impacts analysis of later projects. An environmental document that relies on a GHG reduction plan for a cumulative impacts analysis must identify those requirements specified in the plan that apply to the project, and, if those requirements are not otherwise binding and enforceable, incorporate those requirements as mitigation measures applicable to the project. If there is substantial evidence that the effects of a particular project may be cumulatively considerable, notwithstanding the project's compliance with the specified requirements in the plan for the reduction of GHG emissions, an EIR must be prepared for the project.

3.3.3.3 Local

South Coast Air Quality Management District

As a method for determining significance under CEQA, SCAQMD developed a draft tiered flowchart in 2008 for determining significance thresholds for GHGs for industrial projects where SCAQMD is acting as the lead agency. In December 2008, SCAQMD adopted a threshold of 10,000 MT of CO_2 per year for industrial facilities, but only with respect to projects where SCAQMD is the lead agency (SCAQMD 2008). SCAQMD has not adopted a threshold for non-industrial projects at the time of this Draft PEIR. Although the SCAQMD has adopted a threshold for industrial facilities, this threshold is not used because SCAQMD is not the lead agency for the proposed Program under CEQA.

Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy

The Southern California Association of Governments (SCAG) is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial counties and addresses regional issues relating to transportation, the economy, community development and the environment. On September 3, 2020, SCAG's Regional Council formally adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS; titled Connect SoCal). The 2020-2045 RTP/SCS includes ten goals focused on promoting economic prosperity, improving mobility, protecting the environment, and supporting healthy/complete communities and demonstrates a pathway to achieve the GHG emissions reduction target established by CARB pursuant to SB 375 of a 19 percent reduction in per capita passenger vehicle GHG emissions relative to 2005 emissions levels (SCAG 2020). This plan is focused primarily on reducing passenger vehicle GHG emissions from land use development projects (e.g., residential, commercial) through land use and transportation planning and is therefore not applicable to Metropolitan as a public utility provider.

The Metropolitan Water District of Southern California Climate Action Plan

In May 2022, Metropolitan adopted a CAP and certified the associated PEIR. The CAP sets targets for reducing GHG emissions from Metropolitan's operations, including conveyance, storage, treatment, and delivery of water to its 26 member water agencies. The CAP informs policy and planning decisions and establishes a feasible and implementable way to reach its emissions reduction target.

Metropolitan used an emissions inventory and forecast to provide a basis for establishing targets for future GHG reductions. Metropolitan's CAP established a 2030 target of 40 percent below 1990 levels by 2030 for GHG emissions reduction to achieve consistency with SB 32 and a 2045 target of carbon neutrality consistent the recently signed AB 1279, which codifies the State's goal of achieving carbon neutrality by 2045 that was initially set forth in EO B-55-18. Metropolitan is tracking its GHG emissions annually using a carbon budget approach. The carbon budget is analogous to a tank with a set capacity or a total mass emission cap between emissions level in 2005 and carbon neutrality in 2045. All of the emissions from Metropolitan's operations go into this tank each year. The total capacity of the tank is Metropolitan's total emissions budget, and over time that tank fills up. As long as Metropolitan produces fewer GHG emissions than can fit in the tank, the identified targets will be achieved regardless of emissions produced during any particular year. Metropolitan's total carbon budget was calculated in Section 4.3 of the CAP and is based on the total emissions that can be generated between 2005 and 2045 while still achieving Metropolitan's 2030 and 2045 GHG emissions reduction targets (Metropolitan 2022). Additionally, Metropolitan is committed to

preparing annual CAP Progress Reports to track GHG emissions against the carbon budget, and a CAP update every five years, ensuring carbon neutrality by 2045.

The CAP includes a suite of 42 GHG emissions reduction measures to be implemented that would reduce Metropolitan's GHG emissions and achieve carbon neutrality and provide improved infrastructure reliability, increased energy resiliency, and decreased costs associated with energy procurement and maintenance. GHG reduction measures included in the CAP include phasing out natural combustion, converting to a zero-emissions vehicle fleet, using alternative low-carbon intensity fuels, utilizing low-carbon and carbon-free electricity, improving energy efficiency, increasing waste diversion, and increasing water conservation and local water supplies (Metropolitan 2022).

3.3.4 Thresholds and Methodology

3.3.4.1 Thresholds of Significance

Table 17 lists the thresholds from Appendix G of the CEQA Guidelines that pertain to GHG emissions, which are addressed in the Draft PEIR.

Table 17 CEQA Thresholds for GHG Emissions

Threshold **Would the proposed Program:**
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?

3.3.4.2 Methodology

The analysis of the impacts of the proposed Program on GHG emissions is based on the Air Quality and Greenhouse Gas Report prepared by Entech Consulting Group in April 2023 (Appendix B). The report presents a detailed discussion of the methodology used in evaluating impacts of the proposed Program, including quantification of Program emissions using CalEEMod version 2022.1.0.

3.3.5 Impacts Analysis

3.3.5.1 Program Analysis

Threshold GHG-A: *Would the proposed Program generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

As outlined in Section 1.1 of Metropolitan's CAP, the CAP meets the requirements of CEQA Guidelines Section 15183.5(b)(1) for a qualified GHG emissions reduction plan (Metropolitan 2022). As a result, 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. Therefore, this analysis relies upon the streamlining provisions of CEQA Guidelines Section 15183.5 to determine whether the proposed Program would generate GHG emissions that may have a significant impact on the environment by evaluating whether the proposed Program would be consistent with the CAP. The proposed Program

would be consistent with the CAP if the Program's emissions are within Metropolitan's carbon budget and the Program incorporates all applicable reduction measures from the CAP.

Construction of the proposed Program would result in temporary increases in GHG emissions as a result of the use of heavy-duty construction equipment and vehicle trips generated by construction workers and the transport of construction materials, demolition debris, and soil. Estimated GHG emissions generated during Program construction are shown in Table 18. As shown therein, annual GHG emissions during Program construction would be highest in years 2026, 2027, and 2028 due to overlapping construction activities for multiple projects and would peak during year 2028 at which time the Water Quality Laboratory Building Improvements, Basin Nos. 1 and 2 Rehabilitation, and New Field Engineering Building projects would be under construction. In total, Program construction would generate approximately 5,955 MT of CO_2e, or approximately 198 MT of CO_2e when amortized over a 30-year period pursuant to SCAQMD guidance.

Table 18 Estimated GHG Emissions – Program Construction

Year of Construction	Emissions (MT of CO_2e/year)
2024	56
2025	858
2026	1,287
2027	1,569
2028	2,172
2029	13
Total Construction Emissions	**5,955**
Annual Construction Emissions (amortized over 30 years)[1]	**198**

MT = metric tons; CO_2e = carbon dioxide equivalents

[1] SCAQMD recommends amortizing construction emissions over the lifetime of a project, typically defined as 30 years, and adding the amortized construction emissions to operational emissions to estimate annual emissions.

Source: Appendix B

Operation of the proposed Program would generate GHG emissions primarily through use of landscaping equipment (i.e., area sources), additional electricity usage and potential additional natural gas usage at the expanded Water Quality Laboratory and New Field Engineering building (i.e., energy consumption sources), additional vehicle trips associated with the approximately five to ten new employees (i.e., mobile sources), additional wastewater and solid waste generation by the new employees, and additional water demand by the new employees. No new stationary sources of GHG emissions (e.g., generators) are proposed. Estimated GHG emissions generated during Program operation are shown in Table 19. As shown therein**,** Program operation would generate approximately 840 MT of CO_2e per year, the majority of which would be associated with energy consumption (648 MT of CO_2e per year) and water consumption (146 MT of CO_2e per year). To obtain an estimate of total annual GHG emissions associated with the proposed Program, annual operational emissions were added to amortized construction emissions pursuant to SCAQMD guidance. As shown in Table 19, the proposed Program would generate approximately 1,038 MT of CO_2e per year in total.

Table 19 Estimated GHG Emissions – Program Operation Combined with Amortized Construction Emissions

Emissions Source	GHG Emissions (MT of CO_2e/year)
Area Sources[1]	4
Energy Consumption[2]	648
Mobile Sources[3]	3
Solid Waste[4]	39
Water Consumption[5]	146
Total Operational Emissions	**840**
Amortized Construction Emissions[6]	198
Total Emissions (Annual Construction [amortized] + Annual Operational)	**1,038**

MT = metric tons; CO_2e = carbon dioxide equivalents

[1] Area sources consist of landscaping equipment.

[2] Energy consumption sources consist of additional electricity usage and potential additional natural gas usage at the expanded Water Quality Laboratory and New Field Engineering building.

[3] Mobile sources consist of emissions generated by the approximately five to ten new Metropolitan employees that would be accommodated by the proposed Program.

[4] Solid waste sources consist of the disposal and decomposition of additional solid waste materials generated by the new employees.

[5] Water consumption sources consist of the treatment and conveyance of additional water and wastewater associated with the new employees.

[6] See Table 18. SCAQMD recommends amortization of construction emissions over the lifetime of a project, typically defined as 30 years, and adding the amortized construction emissions to operational emissions to estimate yearly emissions. Operational emissions are not amortized because these emissions are already estimated on a yearly basis.

Source: Appendix B

Individual projects within the proposed Program include sustainability features that would reduce GHG emissions below the conservative GHG emissions estimate provided in Table 19. These design features include, but are not limited to, upgrading electrical fixtures; using water-efficient fixtures; designing to achieve LEED Gold certification for the Water Quality Laboratory Building Improvements project and LEED Silver certification for the New Field Engineering Building project; and installing sustainability features that may consist of energy-efficient appliances and lighting, double-glazed and low-emittance windows, water-efficient toilets and sinks, drought-tolerant landscaping, and LED lighting, where available.

As noted previously, Metropolitan adopted a CAP to address and mitigate organization-wide GHG emissions associated with construction and operational activities. Metropolitan's annual 2022 CAP Progress Report states approximately 9,678,470 MT of CO_2e remains in the carbon budget for years 2022 through 2045 years (Metropolitan 2023). Pursuant to the annual CAP GHG emissions inventory and reporting procedures, GHG emissions generated by proposed Program activities would be tracked as part of Metropolitan's overall carbon budget through data collected from construction contractors, utility and service providers (electricity, natural gas, water, wastewater, and solid waste), and the employee commute survey. In addition, organization-wide CAP measures would be implemented to reduce Metropolitan's GHG emissions over time such that GHG emissions remain within the carbon budget.

In addition, the proposed Program would directly incorporate CAP Measure DC-2 by installing all-electric equipment to the extent feasible for the Water Quality Laboratory Building Improvements project, New Field Engineering Building project, and New La Verne Warehouse Facilities project. (Limited natural-gas-powered equipment may be utilized if procurement of electrically-powered technologies and equipment for certain processes and systems is not feasible.) The proposed Program would also incorporate CAP Measure EE-1 by utilizing interior and exterior LED lighting for the Water Quality Laboratory Building Improvements project, New Field Engineering Building project,

New La Verne Warehouse Facilities project, and any new or retrofitted lighting installed as part of the Administration and Control Buildings Seismic Upgrade and Building Improvements project. As a result, the proposed Program would not conflict with GHG emissions reduction measures listed in the CAP. Therefore, pursuant to CEQA Guidelines Section 15183.5, the proposed Project would not directly or indirectly generate GHG emissions that may have a significant impact on the environment, and impacts would be **less than significant**.

Significance: Less than Significant

Threshold GHG-B: *Would the proposed Program conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Applicable plans, policies, and regulations consist of Metropolitan's CAP, SB 32, EO B-55-18, the 2022 Scoping Plan, and AB 1279. As discussed under Threshold GHG-A, the proposed Program would be consistent with Metropolitan's CAP because 1) GHG emissions generated by proposed Program activities would be tracked as part of Metropolitan's overall carbon budget implementing its organization-wide CAP measures to reduce Metropolitan's GHG emissions over time such that GHG emissions remain within the carbon budget; and 2) the proposed Program would incorporate applicable CAP measures. Also, by being consistent with the CAP, the proposed Program would also be consistent with state GHG emission reduction plans, policies, and regulations, such as the 2022 Scoping Plan, SB 32, EO B-55-18, and AB 1279, because the GHG emission reduction targets established by these plans, laws, and policies are incorporated into and consistent with Metropolitan's GHG emissions reduction targets. Therefore, the proposed Program would not conflict with applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions, and **no impact** would occur.

Significance: No Impact

3.3.5.2 Cumulative Analysis

The geographic scope of cumulative impacts related to GHG emissions and climate change is global because impacts of climate change are experienced on a global scale regardless of the location of GHG emission sources. Therefore, GHG emissions and climate change are, by definition, cumulative impacts. As discussed in Section 3.3.2, *Existing Conditions*, the adverse environmental impacts of cumulative GHG emissions, including sea level rise, increased average temperatures, more drought years, and more large forest fires, are already occurring. As a result, cumulative impacts related to GHG emissions are **significant**. Thus, the issue of GHG emissions and climate change involves an analysis of whether a project's contribution towards an impact is cumulatively considerable.

The determination of whether a project would result in a cumulatively considerable impact related to GHG emissions and climate change is based on the project's compliance with State targets established by SB 32 and EO B-55-18 to reduce GHG emissions to 40 percent below 1990 levels by 2030 and to net zero by 2045. As discussed under GHG-A and GHG-B, the proposed Program would be consistent with Metropolitan's CAP, and by being consistent with the CAP, the proposed Program would also be consistent with state GHG emission reduction targets established by SB 32 and EO B-55-18 because these state-level targets are incorporated into Metropolitan's GHG emissions reduction target. As a result, the proposed Program's contribution to cumulative GHG emissions impacts would **not be cumulatively considerable (less than significant.).**

Cumulative Significance: Cumulative impacts related to GHG emissions would be significant, but the proposed Program's contribution would **not be cumulatively considerable (less than significant).**

3.4 Noise

3.4.1 Introduction

This section describes the existing conditions, regulatory framework, and potential noise impacts that would result from the proposed Program, including substantial temporary and permanent increases in ambient noise levels, and generation of excessive groundborne vibration/noise. This analysis of noise impacts is based primarily on the Noise and Vibration Technical Report prepared for the proposed Program by Entech Consulting Group in May 2023 (Appendix E).

3.4.2 Existing Conditions

The following sections provide an overview of environmental noise and groundborne vibration as well as sensitive receivers and the existing noise environment in the proposed Program site vicinity. A detailed discussion of each of these topics is provided in Appendix E.

3.4.2.1 Environmental Noise

Sound is a vibratory disturbance created by a moving or vibrating source, which is capable of being detected by the hearing organs (e.g., the human ear). Noise is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment (Caltrans 2013).

Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as a doubling of traffic volume, would increase the noise level by 3 dB; similarly, dividing the energy in half would result in a decrease of 3 dB (Caltrans 2013). Human perception of noise has no simple correlation with sound energy: the perception of sound is not linear in terms of dBA or in terms of sound energy. Two sources of equivalent noise level do not “sound twice as loud” as one source. It is widely accepted that the average healthy ear can barely perceive an increase (or decrease) of up to 3 dBA in noise levels (i.e., twice [or half] the sound energy); that a change of 5 dBA is readily perceptible (8 times the sound energy); and that an increase (or decrease) of 10 dBA sounds twice (or half) as loud (10.5 times the sound energy) (Caltrans 2013)

Sound changes in both level and frequency spectrum as it travels from the source to the receiver. The most obvious change is the decrease in sound level as the distance from the source increases. Noise levels may also be reduced by intervening structures; the amount of attenuation provided by this “shielding” depends on the size of the object and the frequencies of the noise levels. Natural terrain features, such as hills and dense woods, and man-made features, such as buildings and walls, can significantly alter noise levels.

One of the most frequently used noise metrics is the equivalent noise level (L_{eq}); it considers both duration and sound power level. L_{eq} is defined as the single steady A-weighted level equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time. Normal

conversational levels are in the 60 to 65 dBA L_{eq} range; ambient noise levels greater than 65 dBA L_{eq} can interrupt conversations (Federal Transit Administration [FTA] 2018).

3.4.2.2 Groundborne Vibration

Groundborne vibration consists of oscillatory waves that move from a source through the ground to adjacent structures. Vibration energy spreads out as it travels through the ground, causing the vibration level to diminish with distance away from the source (Caltrans 2020). Typically, groundborne vibration generated by human activities attenuates rapidly with distance from the source of the vibration. While people have varying sensitivities to vibrations at different frequencies, in general they are most sensitive to low-frequency vibration. Vibration in buildings, such as from nearby construction activities, may cause windows, items on shelves, and pictures on walls to rattle. Building vibration components can also take the form of an audible low-frequency rumbling noise, referred to as groundborne noise. Groundborne noise is usually only a problem when the originating vibration spectrum is dominated by frequencies in the upper end of the range (60 to 200 Hertz), or when foundations or utilities, such as sewer and water pipes, physically connect the structure and the vibration source (FTA 2018). Although groundborne vibration is sometimes noticeable in outdoor environments, it is almost never perceived as annoying to people who are outdoors (FTA 2018). The primary concern from vibration is that it can be intrusive and annoying to building occupants and vibration-sensitive land uses.

Vibration amplitudes are usually expressed in peak particle velocity (PPV) or root mean squared (RMS) vibration velocity. The PPV and RMS velocity are normally described in inches per second (in/sec). PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is often used in monitoring of blasting vibration because it is related to the stresses that are experienced by buildings (Caltrans 2020). Although PPV is appropriate for evaluating the potential for building damage, it is not always suitable for evaluating human response. It takes some time for the human body to respond to vibration signals. In a sense, the human body responds to average vibration amplitude. The RMS of a signal is the average of the squared amplitude of the signal, typically calculated over a one-second period. As with airborne sound, the RMS velocity is often expressed in decibel notation as vibration decibels (VdB), which serves to compress the range of numbers required to describe vibration (FTA 2018). In residential areas, the background vibration velocity level is usually around 50 VdB (approximately 0.0013 in/sec PPV). This level is well below the vibration velocity level threshold of perception for humans, which is approximately 65 VdB. A vibration velocity level of 75 VdB is considered to be the approximate dividing line between barely perceptible and distinctly perceptible levels for many people (FTA 2018).

3.4.2.3 Sensitive Receivers

Noise- and vibration-sensitive land uses are locations where people reside or where the presence of unwanted sound and vibration could adversely affect the use of the land. Residences, schools, hospitals, guest lodging, libraries, and some passive recreation areas would all be considered noise and vibration-sensitive and may warrant unique measures for protection from intruding noise (Metropolitan 2015). Historic buildings are also typically considered vibration sensitive due to the nature of past construction techniques.

Existing noise sensitive uses within 500 feet of the proposed Program site[9] and existing vibration sensitive uses within 200 feet of the Program site are listed below.[10] Additional sensitive receivers are located in the vicinity of the Program site at greater distances; however, noise and vibration levels associated with the proposed Program would attenuate substantially beyond 500 feet for noise and beyond 200 feet for vibration due to intervening development and other noise and vibration sources that dominate the ambient noise and vibration environment in these areas. As a result, this analysis focuses on sensitive uses within these distances (Appendix E).

The following list includes off-site receivers considered sensitive to both noise and vibration (Appendix E):

- **Single-Family Residences.** There are a number of single-family residences within 500 feet of the Program site. These include:
  - Residences adjacent to the northern and southern boundaries of the Weymouth Plant along Doral Street, Ancona Drive, Highland Drive, and 5th Street.
  - Residences to the west of the Weymouth Plant along Sedalia Avenue.
  - Residences along the length of Wheeler Avenue to the west and east of the Water Treatment Chemical Delivery Railroad Tracks.
- **Residential Mobile Home Parks.** The Fountains Senior Living Community is located immediately to the west of the Program site across Moreno Avenue, and the La Verne Mobile Country Club mobile home park is located north of the Program site.
- **Residential Multi-family Residences.** Multi-family residences are located adjacent to Wheeler Avenue Park within 25 feet of the Water Treatment Chemical Delivery Railroad Tracks and at limited other locations within 500 feet of the Program site.
- **Religious Institutions.** Calvary Baptist Church is located approximately 130 feet west of the proposed Program site.
- **Schools.** Calvary Baptist School and Grace Miller Elementary School are located approximately 130 feet west and 200 feet east of the Program site, respectively.

In addition, two sports parks, which are only sensitive receivers with regard to noise, are located within 500 feet of the Program site. Kirk B. Johnson Memorial-Pelota Park is located approximately 200 feet east of the proposed Program boundary. Wheeler Avenue Park is within 25 feet of the water treatment chemical delivery railroad tracks (Appendix E).

Furthermore, as indicated in Section 3.2, *Cultural Resources*, the Administration and Control buildings located within the Program site are considered historic buildings. Historic buildings are more sensitive to vibration and damage from construction. Vibration impact criteria have been established by federal and state agencies to protect them from structural damage during construction. Therefore, the Administration and Control buildings are considered vibration-sensitive receivers for the purpose of this analysis (Appendix E).

[9] The use of a 500-foot radius is consistent with Caltrans guidance (2013) indicating that receptors located beyond 500 feet from the project area do not need to be considered for analysis unless there is a reasonable expectation that noise impacts would extend beyond that boundary.
[10] A 200-foot radius to characterize the nearest vibration sensitive uses because beyond this distance, vibration generated by proposed Program construction activities would not be perceptible.

3.4.2.4 Existing Noise Environment

The existing noise environment at and near the proposed Program site is comprised primarily of vehicle traffic, including trucks, buses, autos traveling on local roadways and on adjacent freeways (SR 210, Foothill Boulevard, and Arrow Highway) and rail traffic on the existing water treatment chemical delivery railroad tracks. In addition, construction of the Metro Gold Line light rail system parallel to Arrow Highway is currently occurring and will continue through 2025. Traffic noise is the highest on major arterial streets, which include Wheeler Avenue, Arrow Highway, Foothill Boulevard, Bonita Avenue, Damien Avenue and Moreno Avenue. Heavy trucks can generate vibrations depending on vehicle type, weight, and pavement conditions. Because heavy trucks typically operate on major streets, existing vibration levels in the Program site vicinity are largely related to heavy truck traffic on the same through streets described above as well as infrequent rail traffic on the existing water treatment chemical delivery railroad tracks. Secondary noise sources include Weymouth Plant operations and nearby commercial and residential activities (Appendix E).

To characterize the existing noise environment around the Program site, ambient noise measurements were taken in January 2023 at four different locations. A detailed discussion of the methodology used for the noise measurements is provided in Appendix E. Existing ambient noise levels are shown in Table 20, and the locations of the noise sensitive receptors and monitoring locations are shown in Figure 4. As shown in Table 20, existing ambient sound levels range between approximately 64 to 70 dBA L_{eq}.

Table 20 Existing Ambient Noise Levels in Program Site Vicinity

Noise Monitoring ID	Receiving Properties Near Noise Monitoring Locations	Sound Level (dBA L_{eq} 24-hour)
NM-1	R-1: Single-Family Residences, Calvary Church and School (Sedalia Avenue)	64.0
NM-2	R-2: Fountain Senior Living Community (Sedalia Avenue)	65.5
NM-3	R-3: Multi-Family Residences, Wheeler Avenue Park (Wheeler Avenue, Arrow Highway) R-5: Single-Family Residences	63.5
NM-4	R-4: Kirk B. Johnson Memorial-Pelota Park, Grace Miller Elementary School (Wheeler Avenue)	69.7

Source: Appendix E

Figure 4 Noise Sensitive Receptors and Noise Monitoring Locations[11]

Imagery provided by Microsoft Bing and its licensors © 2022.
**R6 is only sensitive for vibration because it is a historic building*

21-12248 Weymouth Master Plan
Fig 1-2 Proposed Projects - Updated

3.4.3 Regulatory Framework

This section describes the plans, policies, and regulations related to noise that are applicable to the proposed Program.

3.4.3.1 Federal

There are no federal noise standards that directly regulate environmental noise relevant to the proposed Program. The FTA's 2018 *Transit Noise and Vibration Impact Assessment* guidance document was used to evaluate vibration levels resulting from Program construction activities as they relate to human annoyance and structural damage. The vibration standards based on this guidance are presented in Table 21 and Table 22. These vibration standards are used to evaluate Program impacts related to vibration generated during construction activities, as further detailed in Section 3.7.4, *Thresholds and Methodology*.

Table 21 FTA's Groundborne Vibration Criteria – Human Annoyance

Land Use Category	Max Lv (VdB)	Description
Office	84	Felt vibration. Appropriate to offices and non-sensitive areas.
Residential – Daytime	78	Barely felt vibration. Adequate for computer equipment.
Residential – Nighttime	72	Vibration is not felt, but groundborne noise may be audible inside quiet rooms.

Lv (VdB) = the velocity level in decibels, measured in 1/3-octave bands of frequency over the frequency ranges of 8 to 80 Hertz
Source: Appendix E

Table 22 FTA's Groundborne Vibration Criteria – Architectural Damage

Building Category	PPV (in/sec)
I. Reinforced-concrete, steel, or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12

PPV = peak particle velocity; in/sec = inches per second
Source: Appendix E

3.4.3.2 State

There are no state regulations related to noise applicable to the proposed Program.

[11] The Administration and Control buildings within the Weymouth Plant (labeled as receptor R-6) are sensitive to vibration only due to the historic nature of the buildings. These buildings are not considered noise-sensitive receptors.

3.4.3.3 Local

City of La Verne

La Verne General Plan

The proposed Program site is within La Verne and subject to the policies and requirements of the City's General Plan Noise Element, which are implemented through the City's Municipal Code. The Noise Element of the City's General Plan is intended to provide a systematic approach to identifying and appraising noise problems in the community, quantifying existing and projected noise levels, addressing excessive noise exposure, and developing policies for regulating noise. The City's primary goal is to ensure noise-producing land uses are compatible with adjacent land uses. To this end, the Noise Element establishes noise/land use compatibility guidelines based on cumulative noise criteria for outdoor noise. Based on these guidelines, the maximum 24-hour exterior noise level considered to be normally acceptable for single-family and multi-family residential development is 60 dBA Community Noise Equivalent Level (City of La Verne 1998).

La Verne Municipal Code

La Verne Municipal Code Section 8.20.010 adopts by reference the County of Los Angeles' Ordinance No. 11,773, known as the "noise control ordinance of the county of Los Angeles," which is discussed further in Section 5.3.2, County of Los Angeles Local Regulations. La Verne Municipal Code Chapter 8.20.020(D) has amended the County's noise ordinance. The following activities are prohibited pursuant to La Verne Municipal Code Chapter 8.20.020(D):

- Engaging in noisy construction activities between 8:00 p.m. and 7:00 a.m. on weekdays or any time on Sunday or a legal holiday. "Noisy Construction Activity" is any construction, demolition, drilling or repair work and any earth moving which makes loud noises to the disturbance of persons occupying any place of residence. It includes, but is not limited to, the use of any air compressor, jack hammer, power driven drill, riveting machine, excavating, diesel powered truck, tractor or other earth moving equipment and hand hammers on steel or iron.

County of Los Angeles

Ordinance No. 11,773

As discussed previously, La Verne Municipal Code Section 8.20.010 adopts by reference the County of Los Angeles' noise control ordinance, Ordinance No. 11,773. Ordinance No. 11,773 establishes noise standards to control unnecessary, excessive, and annoying noise. The standards are codified in Chapter 12.08 (Noise Control) of the Los Angeles County Code. The standards listed in Section 12.08.390 (Exterior Noise Standards) are relevant to the proposed Program. The County Code states no person shall operate or cause to be operated, any source of sound at any location within the unincorporated county or allow the creation of any noise on property owned, leased, occupied, or otherwise controlled by such person which causes the noise level, when measured on any other property either incorporated or unincorporated, to exceed any of the noise standards listed in Table 23.

Table 23 County of Los Angeles Exterior Noise Standards

Noise Zone	Designated Noise Zone Land Use (Receiving Property)	Time Interval	Exterior Noise Level (dBA)
I	Noise-Sensitive Area[1]	Anytime	45
II	Residential Properties	10:00 p.m. to 7:00 a.m.	45
		7:00 a.m. to 10:00 p.m.	50
III	Commercial Properties	10:00 p.m. to 7:00 a.m.	55
		7:00 a.m. to 10:00 p.m.	60
IV	Industrial Properties	Anytime	70

[1] A noise sensitive area is defined by Los Angeles County Code Section 12.08.470 as a specific area designated by the County Health Officer that requires exceptional quiet and is indicated by the display of conspicuous signs in at least three separate locations within 0.1 mile of the institution or facility.

This table is used by the County to develop noise standards based on the duration of the noise source. These standards are as follows:

- Standard No. 1 shall be the exterior noise level which may not be exceeded for a cumulative period of more than 30 minutes in any hour. Standard No. 1 shall be the applicable noise level; or, if the ambient L_{50} exceeds the forgoing level, then the ambient L_{50} becomes the exterior noise level for Standard No. 1.
- Standard No. 2 shall be the exterior noise level which may not be exceeded for a cumulative period of more than 15 minutes in any hour. Standard No. 2 shall be the applicable noise level from Standard 1 plus 5 dBA; or, if the ambient L_{25} exceeds the forgoing level, then the ambient L_{25} becomes the exterior noise level for Standard No. 2
- Standard No. 3 shall be the exterior noise level which may not be exceeded for a cumulative period of more than five minutes in any hour. Standard No. 3 shall be the applicable noise level from Standard 1 plus 10 dBA; or, if the ambient $L_{8.3}$ exceeds the forgoing level, then the ambient $L_{8.3}$ becomes the exterior noise level for Standard No. 3.
- Standard No. 4 shall be the exterior noise level which may not be exceeded for a cumulative period of more than one minute in any hour. Standard No. 4 shall be the applicable noise level from Standard 1 plus 15 dBA, or, if the ambient $L_{1.7}$ exceeds the forgoing level, then the ambient $L_{1.7}$ becomes the exterior noise level for Standard No. 4.
- Standard No. 5 shall be the exterior noise level which may not be exceeded for any period of time. Standard No. 4 shall be the applicable noise level from Standard 1 plus 20 dBA; or, if the ambient L_0 exceeds the forgoing level, then the ambient L_0 becomes the exterior noise level for Standard No. 4.

Source: Appendix E

The County's construction noise standards are listed in Section 12.08.440 (Construction Noise) of the County Code. This section prohibits "operating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between weekday hours of 7:00 p.m. and 7:00 a.m., or at any time on Sundays or holidays, such that the sound therefrom creates a noise disturbance across a residential or commercial real-property line, except for emergency work of public service utilities or by variance issued by the health officer." Section 12.08.440 of the County Code includes construction noise limits based on the duration of equipment use (i.e., short- or long-term), type of land use (i.e., single-family residential, multi-family residential, or semi-residential/commercial), and the time period (i.e., daytime or nighttime). The proposed Program would require long-term (i.e., greater than ten days) operation of heavy-duty mechanical equipment. As a result, proposed Program construction activity falls under the scheduled and relatively long-term operation of stationary equipment. Table 24 shows the allowable construction noise levels established by the Los Angeles County Code that would be applicable to the proposed Program.

Table 24 County of Los Angeles Construction Noise Limits – Residential Structures

	Noise Limits (dBA L_{eq})		
	Single-Family Residential	**Multi-Family Residential**	**Semi-Residential /Commercial**
Mobile Equipment: **Maximum noise levels for nonscheduled, intermittent, short-term operation (less than 10 days) of mobile equipment**			
Daily, except Sundays and legal holidays, 7:00 a.m. to 8:00 p.m.	75	80	85
Daily, 8:00 p.m. to 7:00 a.m. and all-day Sunday and legal holidays	60	64	70
Stationary Equipment: **Maximum noise levels for repetitively scheduled and relatively long-term operation (periods of 10 days or more) of stationary equipment.**			
Daily, except Sundays and legal holidays, 7:00 a.m. to 8:00 p.m.	60	65	70
Daily, 8:00 p.m. to 7:00 a.m. and all-day Sunday and legal holidays	50	55	60

Source: Appendix E

Los Angeles County Code Section 12.08.560

Los Angeles County Code Section 12.08.560 prohibits operating or permitting the operation of any device that creates vibration that is above the vibration perception threshold of any individual at or beyond the property boundary of the source if on private property, or at 150 feet (46 meters) from the source if on a public space or public right-of-way is prohibited. The County identifies a perception threshold of a motion velocity of 0.01 in/sec over the range of 1 to 100 Hertz.

3.4.4 Thresholds and Methodology

3.4.4.1 Thresholds of Significance

Table 25 lists thresholds from Appendix G of the CEQA Guidelines that pertain to impacts associated with noise, which are addressed in the Draft PEIR. It was determined in the NOP/Initial Study (Appendix A) that implementation of the proposed Program would have no impact related to potential exposure of people residing or working within the Program area to excessive noise levels related to airports. Therefore, no further analysis of threshold (c) is included in the Draft PEIR.

Table 25 CEQA Thresholds for Noise

Threshold **Would the proposed Program:**
a. Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
b. Generate excessive groundborne vibration or groundborne noise levels?
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels?

The following sections indicate the significance criteria relied upon to make the determinations in Table 25 for thresholds (a) and (b).

Temporary or Permanent Increase in Ambient Noise Levels

On-Site Construction Activities

Metropolitan has not adopted thresholds for evaluating the significance of construction noise impacts. Therefore, this analysis utilizes the construction noise limits established in Section 12.08.440 of the County Code (see Table 24 in Section 3.4.3.3, *Local*). These construction noise limits are based on the duration of equipment use (i.e., short- or long-term), type of land use (i.e., single-family residential, multi-family residential, or semi-residential/commercial), and the time period (i.e., daytime or nighttime). The proposed Program would require long-term (i.e., greater than 10 days) operation of heavy-duty mechanical equipment. As a result, Program construction activities would be classified as "scheduled and relatively long-term operation of stationary equipment." Based on these assumptions, the proposed Program would have the potential to result in a significant construction noise impact if:

- Noise generated by construction activities exceeds 60 dBA L_{eq} during daytime hours and/or 50 dBA L_{eq} during nighttime hours at single-family residences;
- Noise generated by construction activities exceeds 65 dBA L_{eq} during daytime hours and/or 55 dBA L_{eq} during nighttime hours at multi-family residences; and/or
- Noise generated by construction activities exceeds 70 dBA L_{eq} during daytime hours and/or 60 dBA L_{eq} during nighttime hours at semi-residential/commercial areas.

The County Code does not specify construction noise limits for schools or religious facilities. Therefore, for the purposes of this analysis, impacts to these land uses are conservatively assessed using a threshold of 60 dBA L_{eq} during daytime hours, which is consistent with the construction noise limit for long-term equipment use established by Los Angeles County Code Section 12.08.440 for single-family residences. Schools and religious facilities are not routinely used during nighttime hours (10:00 p.m. to 7:00 a.m.); therefore, the nighttime construction noise limit of 50 dBA L_{eq} for single-family residences was not utilized to evaluate impacts to these land uses.

On-Site Operational Activities

Metropolitan has not adopted thresholds for evaluating the significance of on-site operational noise impacts. Therefore, this analysis utilizes the exterior noise level standards established by the Los Angeles County Code (see Table 23 in Section 3.4.3.3, *Local*). The proposed Program would have a significant impact related to operational noise if Program operation would cause operational noise levels to exceed the following thresholds:

- Noise-sensitive areas: 45 dBA L_{eq} at any time
- Residential properties: 50 dBA L_{eq} from 7:00 a.m. to 10:00 p.m. or 45 dBA Leq from 10:00 p.m. to 7:00 a.m.
- Commercial properties: 60 dBA L_{eq} from 7:00 a.m. to 10:00 p.m. or 55 dBA Leq from 10:00 p.m. to 7:00 a.m.
- Industrial properties: 70 dBA L_{eq} at any time

Off-Site Roadway Noise

Metropolitan, the City, and the County of Los Angeles have not adopted thresholds of significance for evaluating roadway noise impacts. As discussed in Section 3.4.2.1, *Environmental Noise*, audible increases in general community noise levels typically refer to a change of 3 dBA or more because this level has been found to be the threshold of perceptibility in exterior environments. Changes in noise

levels between 1 and 3 dBA are "potentially audible," and changes of less than 1 dBA in noise levels are typically "inaudible" to the human ear except under quiet conditions in controlled environments (Caltrans 2013). Only "audible" changes in noise levels at sensitive receptor locations (i.e., 3 dBA or more) are considered potentially significant. Therefore, this report utilizes a threshold of a 3-dBA increase to evaluate potential Program impacts related to a substantial increase in roadway noise levels. A doubling of traffic flows (e.g., an increase from 10,000 vehicles per day along a roadway to 20,000 vehicles per day) is needed to create a 3 dBA increase in traffic-generated noise levels.

Vibration

Neither Metropolitan nor the City have adopted construction or operational vibration standards. Therefore, for the purposes of this analysis, the vibration standard contained in Los Angeles County Code Section 12.08.560 is utilized to evaluate operational vibration impacts. To evaluate vibration impacts related to Program construction, standards established by the FTA are utilized. Based on these regulations and guidance, the proposed Program would result in a significant vibration impact if:

- Construction activities would generate vibration levels that exceed the FTA building damage threshold level of 0.2 in/sec PPV for non-engineered timber and masonry buildings and 0.12 in/sec for historic buildings at the nearest structures (Table 22 in Section 3.7.3.1)
- Construction activities would generate vibration levels that exceed the FTA annoyance criteria of 78 VdB during daytime hours and 72 VdB during nighttime hours at residential areas (Table 21 in Section 3.7.3.1)
- Operational activities would generate a motion velocity of 0.01 in/sec PPV at the Program site boundary

3.4.4.2 Methodology

The analysis of proposed Program impacts to noise is based on the Noise and Vibration Technical Report prepared by Entech Consulting Group in May 2023 (Appendix E). The report presents a detailed discussion of the methodology used in evaluating impacts of the proposed Program, including quantification of noise and vibration levels associated with Program construction and operation.

3.4.5 Impacts Analysis

3.4.5.1 Program Analysis

Threshold NOI-A: *Would the proposed Program result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Program site in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

On-Site Construction Noise

On-site construction noise represents a temporary impact on ambient noise levels. Construction noise is primarily caused by diesel engines (e.g., trucks, dozers, backhoes), impact equipment (e.g., jackhammers, pile drivers, hoe rams), and backup alarms. Construction equipment can be stationary or mobile. Stationary equipment operates in one location for hours or days in a constant mode (e.g., generators, compressors) or generates variable noise operations (e.g., pile drivers, jackhammers),

producing constant noise for a period of time. Mobile equipment moves around the site and is characterized by variations in power and location, resulting in significant variations in noise levels over time. Earthmoving activities typically generate the most significant noise impacts during construction.

During Program construction, the nearest off-site noise-sensitive receivers exposed to increased noise levels would be residential uses, parks, and schools located in proximity to the Program site. Specifically, the nearest off-site noise-sensitive receivers include the following:

- **R-1:** Single-Family residences, Calvary Church and School (Sedalia Avenue)
- **R-2:** Fountain Senior Living Community (Sedalia Avenue)
- **R-3:** Multi-family residences, Wheeler Avenue Park (Wheeler Avenue, Arrow Highway)
- **R-4:** Kirk B. Johnson Memorial-Pelota Park, Grace Miller Elementary School (Wheeler Avenue)
- **R-5:** Single-family residences east of Wheeler Avenue (Wheeler Avenue)

Estimated construction noise levels do not account for the presence of intervening structures or topography that would attenuate construction noise levels to varying degrees at nearby sensitive receptors. Therefore, the evaluation of construction noise impacts is a conservative analysis. Construction noise levels are estimated for those receptors within 500 feet of the individual project sites. The use of a 500-foot radius is consistent with the Caltrans' guidance (2013), which states that receptors located beyond 500 feet from the project area do not need to be considered for analysis unless there is a reasonable expectation that noise impacts would extend beyond that boundary. Beyond this distance, noise levels associated with Program construction activities would attenuate substantially due to intervening development and other noise sources that would dominate the ambient noise environment at those receptors.

Over the course of a construction day, the highest noise levels would be generated when multiple pieces of construction equipment are being operated concurrently. Construction noise levels associated with the proposed Program were calculated for a scenario in which all construction equipment was assumed to be operating simultaneously within a given construction phase for a given project and located at the construction area nearest to the affected receivers to present a conservative impact analysis. This is considered a conservative evaluation because the Program would typically use less overall equipment on a daily basis and, as such, would generate lower noise levels. In reality, the magnitude of construction noise impacts would vary throughout the entire construction period with the greatest impacts occurring when heavy construction equipment is operating near the Program site perimeter.

Most construction activities would occur during daytime hours; however, the Water Treatment Chemical Delivery Railroad Tracks Replacement project may occur during nighttime hours. Therefore, the County's nighttime noise thresholds apply to this project in addition to the daytime noise thresholds that are applicable to all projects included in the proposed Program. The Water Quality Laboratory Building Improvements project as well as other projects included in the proposed Program may require incidental construction activities within the interiors of buildings during nighttime hours; however, these low-intensity interior activities would not be audible off-site and are thus not evaluated further.

Table 26 presents the estimated construction noise levels for each project included in the proposed Program. Noise levels shown in this table are the highest noise levels at each sensitive receiver across all construction phases (e.g., demolition, grading, building construction) for each project. As shown therein, construction noise levels at the nearest sensitive receivers would reach estimated exterior noise levels of up to 92 dBA L_{eq}. Construction noise levels at each receiver would vary through the

duration of Program construction activities depending on the specific project under construction, the specific phase of construction in progress, and whether individual projects are overlapping. During Program construction, all receivers would experience temporary increases in ambient noise levels that would be audible, readily perceivable, and substantial because noise levels would exceed the daytime and nighttime thresholds of significance at various points. Therefore, without mitigation, construction noise impacts would be **significant**. Implementation of MM NOI-1 (detailed in Section 3.4.5.3 [Mitigation Measure]), which involves use of temporary construction noise barriers would be required. However, as detailed further in Section 3.4.5.3 (Mitigation Measure), construction noise levels would still exceed daytime and nighttime thresholds at varying points during Program construction even with implementation of Mitigation Measure NOI-1, and installation of temporary noise barriers between noise-sensitive receivers and the construction site for the Water Treatment Chemical Delivery Railroad Replacement project may not be feasible in all circumstances due to space and worker safety constraints, the mobile nature of track replacement activities, and the need to minimize the duration of closures of the west legs of intersections along Wheeler Avenue. As a result, construction noise impacts would be **significant and unavoidable** during temporary Program construction activities.

Significance after Mitigation: Significant and unavoidable

Table 26 Estimated Noise Levels Generated by Program Construction Activities - Unmitigated

Construction Phases Occurring Concurrently	Hourly Noise Level by Receiver Location (dBA L_{eq})[1]				
	Single Family Residences, Calvary Church, and School at Sedalia Avenue (R-1)	Fountain Senior Living Community (R-2)	Multi-Family Residences at Wheeler Avenue (R-3)	Kirk B. Johnson Memorial Pelota Park and Grace Miller Elementary (R-4)	Single-Family Residences East of Wheeler Avenue (R-5)
Exterior Daytime Construction Activities					
Water Quality Laboratory Building Improvements	**81.1**	**87.1**	n/a	n/a	n/a
Administration and Control Buildings Seismic Upgrade and Building Improvements	n/a	**82.5**	n/a	n/a	n/a
Water Treatment Chemical Delivery Railroad Tracks Replacement	n/a	n/a	**92.1**	**81.0**	**81.0**
Basin Nos. 1 and 2 Rehabilitation	n/a	**87.5**	n/a	n/a	n/a
New La Verne Warehouse Facilities	n/a	n/a	n/a	**82.5**	**79.0**
Daytime Threshold of Significance[2]	60	60	65	60	60
Daytime Threshold of Significance Exceeded?	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**
Exterior Nighttime Construction Activities					
Water Treatment Chemical Delivery Railroad Tracks Replacement	n/a	n/a	**92.1**	**81.0**	**81.0**
Nighttime Threshold of Significance[2]	50	50	55	50	50
Nighttime Threshold of Significance Exceeded?	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**

dBA = A-weighted decibel; L_{eq} = equivalent noise level

Note: Bold values exceed daytime and/or nighttime threshold of significance.

[1] Noise levels are only estimated for those receptors within 500 feet of the individual project sites. The New Field Engineering Building site is not within 500 feet of sensitive receptors. As a result, estimated noise levels for this project are not shown.

[2] Thresholds of significance are based on Los Angeles County Code Section 12.08.440.

Source: Appendix E

Off-Site Construction Roadway Noise

Proposed Program construction would generate temporary trips by workers, vendors, and haul trucks. The proposed construction haul route for all demolition and soil export as well as material delivery would use the Wheeler Avenue gate entrance/exit at the Weymouth Plant, generally located across from Pelota Park between Paseo Avenue and Holly Oak Street. Trucks would travel northeast on Wheeler Avenue to Foothill Boulevard and merge onto SR 210 or south on Wheeler Avenue to Arrow Highway and merge onto SR 57. The transport of workers and materials to and from the Program construction sites would thus incrementally increase noise levels along Wheeler Avenue from Foothill Boulevard to Arrow Highway. Individual construction vehicle pass-bys may create momentary noise levels of up to approximately 85 dBA (L_{max}) at a distance of 50 feet from the construction vehicle, but these occurrences would be intermittent and short-lived (Appendix E).

Program construction activities would generate the most trips during construction of the Water Quality Laboratory Building Improvements project. At the peak of construction, approximately 199 average daily trips would occur during this phase. The City's General Plan Existing Condition Report indicates the existing Average Daily Traffic (ADT) along Wheeler Avenue ranges from 10,677 ADT from Bonita Avenue to Arrow Highway to 11,912 ADT from Foothill Boulevard to Bonita Avenue. In order for worker, vendor, and haul trips to result in an audible 3 dBA increase in noise, existing ADT would need to double for the proposed Program construction activities. Therefore, the addition of approximately 199 construction-related trips during peak construction activities would result in a negligible, inaudible noise increase of 1.0 dBA or less (Appendix E). As a result, off-site construction-related traffic would not generate a substantial temporary increase in ambient noise levels at noise-sensitive receivers along the anticipated construction traffic routes, and impacts would be **less than significant.**

Significance: Less than significant

On-Site Operational Noise

The proposed Program would likely include upgrades to and replacement of existing HVAC equipment and/or installation of new HVAC equipment at the Water Quality Laboratory Building, the New La Verne Warehouse Facilities, and the New Field Engineering Building. Upgraded and new HVAC equipment would generate noise during operation as components cycle on and off. However, long-term ambient noise levels at the nearest sensitive receivers would not increase as a result of the proposed Program because parapet walls along the rooftops would be incorporated as part of the design to shield equipment and would block the line of sight to noise-sensitive receivers, which are located at least 200 feet from the nearest building at which upgraded/new HVAC equipment would be installed. Therefore, operational-related on-site equipment would not generate a substantial permanent increase in ambient noise levels at noise-sensitive receivers, and impacts would be **less than significant.**

Significance: Less than significant

Off-Site Operational Roadway Noise

According to the Trip Generation and Vehicle Miles Traveled (VMT) Screening Analyses prepared for the proposed Program (Appendix G), the proposed Program would generate a net increase of approximately 39 total daily trips associated with the Water Quality Laboratory Building Improvements project. Metropolitan staff would enter and exit the Weymouth Plant primarily via the existing access gate on Moreno Avenue, located across from Pelota Park generally between Paseo Avenue and Holly Oak Street, and the proposed access gate on Sedalia Avenue near Forestdale Street. Sedalia Avenue has an ADT of approximately 900 trips, and Moreno Avenue experiences a similar

level of vehicular traffic. As such, the number of Metropolitan staff trips generated from the proposed Program during operation would not double existing traffic volumes and would therefore not have the potential to result in a 3-dBA increase in traffic-generated noise levels. As such, off-site operational roadway noise would not generate a substantial permanent increase in ambient noise levels at noise-sensitive receivers, and impacts would be **less than significant.**

Significance: Less than significant

Threshold NOI-B: *Would the proposed Program result in a generation of excessive groundborne vibration or groundborne noise levels?*

Construction Vibration

Construction activities at the proposed Program site have the potential to generate low levels of groundborne vibration because the operation of heavy equipment (e.g., backhoes, dozers, excavators, graders, loaders, scrapers, haul trucks) generates vibrations that propagate though the ground and diminish in intensity with distance from the source. Groundborne vibrations from construction activities very rarely reach the levels that can damage structures, but they may be perceived in buildings close to a construction site. No high-impact activities, such as pile driving or blasting, would be used during Program construction. The nearest off-site vibration-sensitive receivers to the Program construction sites are single-family and multi-family residential buildings, Calvary Baptist Church and School, and the Grace Miller Elementary School. In addition, the Administration and Control buildings within the Weymouth Plant are historic buildings that are sensitive to vibration. The following discussion of construction-related vibration impacts focuses on sensitive receptors within 50 feet of Program construction activities (i.e., receptors R-1, R-3, and R-6) because vibration levels would attenuate (or decrease) substantially beyond this distance.

Estimated construction vibration levels for several types of construction equipment that can generate perceptible vibration levels are shown in Table 27. As shown in this table, vibration velocities could range from 0.003 to 0.089 in/sec PPV at 25 feet from the source of construction activities.

Table 27 Vibration Source Levels for Construction Equipment

Approximate PPV (in/sec)	Approximate Vibration Levels - in/sec PPV					Approximate Vibration Levels - VdB				
Equipment	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet	25 Feet	50 Feet	60 Feet	75 Feet	100 Feet
Large Bulldozer	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Hoe Ram	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Caisson Drilling	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Loaded Trucks	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68
Jackhammer	0.035	0.012	0.009	0.007	0.004	79	70	68	65	61
Small Bulldozer	0.003	0.001	0.0008	0.0006	0.0004	58	49	47	44	40

in/sec = inches per second; PPV = peak particle velocity; VdB = vibration decibels

Source: Appendix E

Receptor R-3 (multi-family residences and Wheeler Avenue Park) is within 25 feet of construction activities occurring at the Water Treatment Chemical Delivery Railroad Tracks Replacement project. Vibratory construction equipment utilized for this project would be limited to a small bulldozer due to the limited existing work space. As shown in Table 27, maximum vibration levels at a distance of 25 feet (i.e., the distance to receptor R-3 and construction activities) would reach up to approximately 0.003 in/sec PPV during use of a small bulldozer. This level is below the FTA's structural damage

significance threshold of 0.2 in/sec PPV for non-engineered timber buildings. Receptor R-1 (single-family residences and Calvary Church/School) is within 50 feet of construction activities occurring on-site. As shown in Table 27, vibration velocities from large earthmoving equipment and drilling equipment would reach up to 0.031 in/sec PPV at a distance of 50 feet (i.e., the distance between receptor R-1 and construction activities). This level is below the FTA's structural damage significance threshold of 0.2 in/sec PPV for non-engineered timber buildings. Vibration levels at other non-engineered timber buildings located further away from Program construction activities (e.g., receptors R-2, R-4, and R-5) would be less than those experienced at receptors R-1 and R-3 and therefore would also be below the threshold of significance for structural damage. As such, vibration generated by Program construction activities would not result in structural damage, such as cracks in walls or foundations. Vibration levels at other non-engineered timber buildings located further away from Program construction activities (e.g., receptors R-2, R-4, and R-5) would be less than those experienced at the closest structures and therefore would also be below the threshold of significance for structural damage.

Construction activities occurring within 25 feet of the historic Administration and Control buildings at the Weymouth Plant would generate maximum vibration levels up to approximately 0.089 in/sec PPV at a distance of 25 feet (i.e., the distance between the Administration and Control buildings and construction activities) from use of typical earthmoving equipment and drilling equipment proposed during construction. This level of vibration is below the structural damage significance threshold of 0.12 in/sec PPV for historic buildings. All other historic structures at the Weymouth Plant are located farther away, and vibration velocities would be lower at these more distant structures. As such, vibration generated by Program construction activities would not result in structural damage, such as cracks in walls or foundations, to historic buildings.

With respect to human annoyance, the nearest residential uses within 25 feet of the Program site are adjacent to the existing water treatment chemical delivery railroad tracks north of Arrow Highway. These residences would experience an annoyance vibration level of 58 VdB during construction activities for the Water Treatment Chemical Delivery Railroad Tracks Replacement project, which is below the thresholds of 78 VdB during daytime hours and 72 VdB during nighttime hours. All other sensitive receivers would be located at a greater distance from Program construction activities and thus would also not experience vibration levels in excess of the daytime and nighttime thresholds for human annoyance. As such, construction vibration would not result in substantial human annoyance, including disruption of sleep during nighttime hours.

In light of the above discussion, Program construction activities would not result in generation of excessive groundborne vibration or groundborne noise levels, and impacts would be **less than significant.**

Significance: Less than significant

Operation

The expanded Water Quality Laboratory Building, New Field Engineering Building, and New La Verne Warehouse Facilities may include new equipment (e.g., typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, exhaust fans) that would potentially create new vibration sources. In addition, the primary sources of transient vibration at the Program site would be passenger vehicle circulation associated with the approximately five to ten new Metropolitan employees. All other vibration sources associated with Weymouth Plant operations (e.g., water treatment chemical deliveries along the railroad tracks, heavy truck trips to and from the La Verne Warehouse Facilities) would remain the same as under existing baseline conditions and would not be affected by the proposed Program.

Pursuant to standard industry practice, vibration isolators and mounts[12] would be installed to reduce vibration velocities from typical commercial-grade stationary machinery associated with the expanded Water Quality Laboratory Building, New Field Engineering Building, and New La Verne Warehouse Facilities. Therefore, operational groundborne vibration generated by each of these projects would generate up to approximately 50 VdB adjacent to the Program site. In addition, vehicular movements by the additional five to ten Metropolitan staff would generate similar vibration levels as existing traffic conditions and would not be a substantial source of vibration. The potential vibration levels from all Program operational sources at the closest sensitive receivers would not have the potential to exceed the significance threshold for human annoyance of 78 VdB during daytime hours and 72 VdB during nighttime hours. Vibration levels would also be below the threshold of significance of a motion velocity of 0.01 in/sec PPV at the Program site boundary pursuant to Section 12.08.560 of the Los Angeles County Code. As a result, Program operation would not generate excessive groundborne vibration or groundborne noise levels, and impacts would be **less than significant.**

Significance: Less than significant

3.4.5.2 Cumulative Analysis

Cumulative impacts consider impacts at the Program site together with similar impacts of existing development and reasonably anticipated projects in accordance with the City's cumulative project list. The general approach to cumulative impact analysis used in this EIR is discussed in Section 3, *Environmental Impact Analysis and Mitigation Measures*, and cumulative projects are listed in Table 4 of this section. Noise and vibration are typically localized and rapidly attenuate within an urban environment; therefore, the geographic scope of cumulative noise and vibration impacts is limited to within 0.25 mile of the Program site.

Construction

Although some cumulative projects in the surrounding area may be under construction at the same time as the proposed Program, these projects are mostly more than 0.25 mile from the Program site, meaning that noise and vibration from construction activities would not impact the same sensitive receivers and structures as those impacted by Program construction. Pure Water Southern California components at the Weymouth Plant may be under construction at the same time as the Water Quality Laboratory Building Improvements, Basins Nos. 1 and 2 Rehabilitation, and/or New Field Engineering Building projects in years 2028 and 2029. Construction activities associated with Pure Water Southern California could affect the same sensitive receivers as the proposed Program, depending on the ultimate location of these construction activities within the Weymouth Plant boundaries, and temporarily expose these sensitive receivers to a substantial increase in ambient noise levels in excess of the County's construction noise thresholds. Therefore, cumulative impacts related to construction noise would be significant. Because Program construction activities would result in an exceedance of the County's thresholds of significance at various sensitive receivers, the proposed Program's contribution to cumulative construction noise impacts would be **cumulatively considerable (significant)**. Implementation of MM NOI-1 (detailed in Section 3.4.5.3 [Mitigation Measure]), which involves use of temporary construction noise barriers and curtains, would be required. Further information on how this measure would reduce the proposed Program's contribution to cumulative construction noise impacts can be found in Section 3.4.5.3 (Mitigation Measure).

[12] Vibration isolators refer to materials used to separate the building from the vibration-generating components of the HVAC system. A vibration mount is a system component that absorbs vibration from the HVAC system.

Cumulative Significance: Cumulative impacts related to construction noise would be significant, and the proposed Program's contribution would **be cumulatively considerable (significant and unavoidable)**. Cumulative impacts related to construction vibration would be **less than significant.**

Operation

Existing development and cumulative projects in the surrounding area include similar operational noise sources as the proposed Program (e.g., vehicle trips, HVAC equipment). However, operational noise and vibration from these sources is localized and rapidly attenuates within an urbanized setting due to the effects of intervening structures that block line of sight and other noise sources. In addition, similar to the proposed Program, existing development and cumulative projects are required to comply with the City's General Plan Noise Element and the provisions of the La Verne Municipal Code related to noise regulation, which establish noise level limits based on the County of Los Angeles' noise ordinance. Furthermore, no significant operational vibration sources are located in the vicinity of the Program site with the potential to result in cumulative operational impacts. Therefore, cumulative operational noise and vibration impacts would be **less than significant.**

Cumulative Significance: Cumulative impacts related to operational noise and vibration would be **less than significant.**

3.4.5.3 Mitigation Measure

Implementation of MM NOI-1 would be required for the proposed Program. In addition to this mitigation measure, the project contractor(s) would be required to comply with Metropolitan's standard practices related to noise control as outlined in Section 01065 of the construction contractor specifications. These standard practices include keeping construction vehicle equipment in proper working order for the duration of the construction activities, equipping construction vehicles and equipment with mufflers in proper working order for the duration of the construction activities, obtaining a noise variance for nighttime and/or weekend work if required, preparation of a Noise Control Plan that includes detailed noise attenuation measures with a noise monitoring program, locating noise-generating and stationary construction equipment as far as practicable from sensitive receivers, orienting noise-generating equipment so that the source of noise is facing away from the sensitive receivers, and installing noise control barriers surrounding stationary noise-generating equipment.

Mitigation Measure NOI-1 Temporary Construction Noise Barriers

> **NOI-1**. During all construction activities within 500 feet of sensitive receptors, temporary noise barriers that are of sufficient height to block the line of sight between the equipment and the sensitive receiver(s) shall be erected along the perimeter(s) of the active construction area that face the sensitives receiver(s). The temporary barriers shall have a minimum Sound Transmission Class rating of 21 and noise reduction coefficient of 0.75. Additionally, the temporary barriers shall be a minimum of 10 feet in height or of sufficient height to intercept the line of sight between the noise-generating source of the construction equipment (i.e., the exhaust) and nearby residential receivers, whichever is greater.

Implementation of MM NOI-1 would reduce noise levels during each phase of Program construction activities by approximately 5 dBA due to the installation of temporary noise barriers. Noise levels would be further reduced with implementation of the additional noise reduction measures as outlined in the construction contractor specifications, although the level of noise reduction that would be achieved is difficult to quantify and was thus not estimated for purposes of this analysis (Appendix E).

Table 28 presents estimated construction noise levels with implementation of MM NOI-1. (As discussed previously, to provide a conservative analysis, estimated construction noise levels do not account for the presence of intervening structures or topography that would attenuate construction noise levels to varying degrees at nearby sensitive receptors.) As shown therein, even with implementation of MM NOI-1, construction noise associated with the proposed Program would continue to exceed the established daytime thresholds of significance of 60 and 65 dBA L_{eq} for single-family and multi-family residential land uses, respectively, at varying points during Program construction as well as the nighttime thresholds of significance of 50 and 55 dBA L_{eq} for single-family and multi-family residential land uses, respectively, during the Water Treatment Chemical Delivery Railroad Tracks project. In addition, installation of temporary noise barriers between noise-sensitive receivers and the construction site for the Water Treatment Chemical Delivery Railroad Replacement project may not be feasible in all circumstances due to space and worker safety constraints, the mobile nature of track replacement activities, and the need to minimize the duration of closures of the west legs of intersections along Wheeler Avenue. As a result, construction noise impacts would be **significant and unavoidable** during temporary Program construction activities. In addition, because implementation of MM NOI-1would not reduce the proposed Program's construction noise impacts below the thresholds of significance, the proposed Program's contribution to cumulative construction noise impacts would remain **cumulatively considerable** (**significant and unavoidable**).

Significance after Mitigation: Significant and unavoidable

Table 28 Estimated Noise Levels Generated by Program Construction Activities - Mitigated

Construction Phases Occurring Concurrently	Hourly Noise Level by Receiver Location (dBA L_{eq})[1]				
	Single Family Residences, Calvary Church, and School at Sedalia Avenue (R-1)	Fountain Senior Living Community (R-2)	Multi-Family Residences at Wheeler Avenue (R-3)	Kirk B. Johnson Memorial Pelota Park and Grace Miller Elementary (R-4)	Single-Family Residences East of Wheeler Avenue (R-5)
Exterior Daytime Construction Activities					
Water Quality Laboratory Building Improvements[3]	**76.1**	**82.1**	n/a	n/a	n/a
Administration and Control Buildings Seismic Upgrade and Building Improvements[3]	n/a	**75.6**	n/a	n/a	n/a
Water Treatment Chemical Delivery Railroad Tracks Replacement[2]	n/a	n/a	**87.1**	**76.0**	**76.0**
Basin Nos. 1 and 2 Rehabilitation[3]	n/a	**82.5**	n/a	n/a	n/a
New La Verne Warehouse Facilities[3]	n/a	n/a	n/a	**77.5**	**74.0**
New Field Engineering Building[3]	n/a	n/a	n/a	n/a	n/a
Daytime Threshold of Significance[4]	60	60	65	60	60
Daytime Threshold of Significance Exceeded?	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**
Exterior Nighttime Construction Activities					
Water Treatment Chemical Delivery Railroad Tracks Replacement[2]	n/a	n/a	**87.1**	**76.0**	**76.0**
Nighttime Threshold of Significance[4]	50	50	55	50	50
Nighttime Threshold of Significance Exceeded?	**No**	**No**	**Yes**	**Yes**	**Yes**

dBA = A-weighted decibel; L_{eq} = equivalent noise level

Note: Bold values exceed daytime and/or nighttime threshold of significance.

[1] Noise levels are only estimated for those receptors within 500 feet of the individual project sites. The New Field Engineering Building site is not within 500 feet of sensitive receptors. As a result, estimated noise levels for this project are not shown.

[2] Exterior construction activities would occur during daytime and nighttime hours. Both daytime and nighttime thresholds of significance apply.

[3] Exterior construction activities would occur during daytime hours. Only the daytime thresholds of significance apply.

[4] Thresholds of significance are based on Los Angeles County Code Section 12.08.440.

Source: Appendix E

3.5 Transportation

3.5.1 Introduction

This section describes the existing conditions, regulatory framework, and potential impacts to transportation that would result from the proposed Program, including conflicts with programs, plans, ordinances or polices addressing the circulation system; substantial increases in vehicle miles traveled (VMT); introduction of traffic hazards; and inadequate emergency access. The analysis of transportation impacts is based primarily on the Construction Traffic Impact Analysis (April 2023), Trip Generation and VMT Screening Analyses (March 2023) and Sedalia Avenue Access Evaluation (May 2023) prepared by Translutions. These reports are provided as Appendices F, G, and H to the Draft PEIR, respectively.

3.5.2 Existing Conditions

3.5.2.1 Existing Roadway Systems

Regional Roadways

The following freeway network provides regional access to the proposed Program site vicinity:

- **SR 210 (Foothill Freeway)** is a major east-west state highway within greater Los Angeles County. The portion of SR 210 in the Program site vicinity is approximately 0.5 mile to the north of the Weymouth Plant and has eight lanes.
- **SR 57 (Orange Freeway)** is a north-south state highway in Los Angeles and Orange Counties. It connects the I-5/SR 22 interchange near downtown Orange with the I-210/SR-210 interchange in Glendora. The portion of SR 57 in the Program site vicinity is approximately two miles to the west of the Weymouth Plant. South of Foothill Boulevard, SR 57 has eight lanes.
- **I-10 (San Bernardino Freeway)** is a major east–west interstate highway that runs from Santa Monica through Los Angeles and San Bernardino to the Arizona border. The portion of I-10 in the Program site vicinity is approximately two miles to the south of the Weymouth Plant. East of SR 57, I-10 has 10 lanes.

Local Roadways

The local roadways potentially affected by the proposed Program include the following (see Appendix F for a detailed discussion):

- **Wheeler Avenue** is oriented in the north-south direction. There are two 10- to 14-foot travel lanes in each direction with a posted speed limit of 40 miles per hour (mph). Wheeler Avenue borders the eastern side of the Plant and is the site of the Water Treatment Chemical Delivery Railroad Tracks Replacement project.
- **5th Street** is oriented in the east-west direction. There is one 17- to 18-foot travel lane in each direction with a posted speed limit of 35 mph. On-street parking is permitted along the road.

- **Bonita Avenue** is oriented in the east-west direction. There are two 11-foot travel lanes in each direction with a posted speed limit of 35 mph. There is a bicycle route along the north side and south side of Bonita Avenue.
- **3rd Street** is oriented in the east-west direction. There is one 17- to 18-foot travel lane in each direction with a posted speed limit of 35 mph.
- **Palomares Avenue** is oriented in the east-west direction. There is one 10- to 11-foot travel lane in each direction with a posted speed limit of 25 mph.
- **Moreno Avenue** is oriented in the north-south direction. The posted speed limit is 40 mph.
- **Sedalia Avenue** is oriented in the north-south direction. The posted speed limit is 35 mph except for the school zone speed limit of 25 mph in the vicinity of Calvary Baptist Church and School.

Sidewalks are consistently provided on both sides of the above-mentioned local roadways with the exception of the west side of Wheeler Avenue between 3rd Street and Palomares Avenue and the east side of Sedalia Avenue. Sidewalks along Wheeler Avenue are generally in good condition, free of cracks or uplift. Crosswalk ability across Wheeler Avenue is limited. A marked crosswalk is available at Bonita Avenue to cross Wheeler Avenue, and this intersection is signalized. There are no other marked opportunities to cross Wheeler Avenue at the remaining intersections between Palomares Avenue and the southern boundary of the Weymouth Plant (Appendix F).

3.5.2.2 Public Transportation

Several transportation authorities are located in the proposed Program site vicinity. These agencies include the following:

- **Metrolink** provides public transportation throughout the greater Los Angeles area. The San Bernardino Line stops at the Pomona station and the Covina station near the Program site vicinity. There is no Metrolink station in La Verne.
- **Metro Gold Line** provides public transportation throughout Los Angeles County. Currently, a new station in La Verne is in the construction phase and is planned to be completed in January 2025 (Foothill Gold Line 2023). The station will be located north of Arrow Highway and east of E Street, between the University of La Verne and Pomona Fairplex.
- **Foothill Transit** provides bus service for the San Gabriel and Pomona Valleys. Foothill Transit stops in the Program site vicinity include Line 492, which generally stops at designated locations along Bonita Avenue and Foothill Boulevard.

3.5.2.3 Level of Service

Level of service (LOS) is a metric used to evaluate the performance of roadways and transportation elements, such as intersections, freeway entrances, and transit service, among others. It is essentially a measure of the quality of operational conditions within a traffic stream and is generally based on such measures as speed and travel time, freedom to maneuver, traffic interruptions, and comfort and convenience. Table 29 presents a brief description of each level of service letter grade, as well as the range of delays associated with each grade. Levels range from A to F, with LOS A representing excellent (free-flow) conditions with very slight delay and no approach phase fully utilized[13] and LOS

[13] An approach phase refers to the period of time when the light is green for a particular approach to an intersection. When an approach phase is fully utilized, this means all vehicles cannot go through when the light is green for that approach, and a vehicle might have to wait for more than one cycle of the signal.

F representing extreme congestion with very high delays and congestion, frequent cycle failures[14], and long queues (Appendix F).

Table 29 Transportation Research Board's Intersection LOS Criteria

Level of Service (LOS)	Description of Drivers' Perception and Traffic Operations[1, 2, 3, 4]	Delay (in Seconds)	
		Unsignalized Intersection	Signalized Intersection
A	This level is typically assigned when the volume-to-capacity ratio is low, and either progression is exceptionally favorable or the cycle length is very short. If progression is exceptionally favorable, most vehicles arrive during the green indication and travel through the intersection without stopping.	< 10	< 10
B	This level is assigned when the volume-to-capacity ratio is low, and either progression is highly favorable or the cycle length is short. More vehicles stop at the intersection than with LOS A.	> 10 and < 15	> 10 and < 20
C	This level is typically assigned when progression is favorable or the cycle length is moderate. Individual cycle failures (i.e., one or more queued vehicles are not able to travel through the intersection as a result of insufficient capacity during the cycle) may begin to appear at this level. The number of vehicles stopping at the intersection is significant, although many vehicles still pass through the intersection without stopping.	> 15 and < 25	> 20 and < 35
D	This level is typically assigned when the volume-to-capacity ratio is high, and either progression is ineffective or the cycle length is long. Many vehicles stop at the intersection, and individual cycle failures are noticeable.	> 25 and < 35	> 35 and < 55
E	This level is typically assigned when the volume-to-capacity ratio is high, progression is unfavorable, and the cycle length is long. Individual cycle failures are frequent.	> 35 and ≤ 50	> 55 and ≤ 80
F	This level is typically assigned when the volume-to-capacity ratio is very high, progression is very poor, and the cycle length is long. Most cycles fail to clear the queue.	> 50	> 80

[1] Progression refers to the scenario in a coordinated system wherein a vehicle gets a green light at one intersection, and if the vehicle travels at the speed limit, it also gets a green light at subsequent intersections.
[2] Volume-to-capacity ratio refers to the ratio of the volume to the capacity of the intersection.
[3] Cycle length refers to the time between the beginning of a green light to the next beginning of green light for an intersection.
Source: Appendix F

An intersection LOS analysis was conducted for existing conditions to determine current circulation system performance at four study intersections along Wheeler Avenue that would be affected by temporary intersection closures during construction of the Water Treatment Chemical Delivery Railroad Tracks Replacement project. Existing traffic volumes are based on peak hour intersection turn movement counts collected in November 2022. Consistent with industry practice, intersection LOS was modeled for the AM and PM peak hours. The AM peak hour is defined as the one hour of highest traffic volumes occurring between 7:00 a.m. and 9:00 a.m. The PM peak hour is defined as the one hour of highest traffic volumes occurring between 4:00 and 6:00 p.m. (Appendix F). Future traffic volumes were modeled for the study intersections based on the potential growth rate in traffic volumes that would occur between 2022 and 2024. Year 2024 is used in this Program EIR to represent future traffic volumes because year 2024 is the earliest estimated year in which construction of the Water Treatment Chemical Delivery Railroad Tracks Replacement project, which would affect these intersections, is proposed to begin (Appendix F). Table 30 presents intersection operations under existing conditions (2022) and future 2024 conditions. The City's criterion for acceptable

[14] A cycle failure occurs when one or more queued vehicles are not able to travel through the intersection as a result of insufficient capacity during the cycle. For example, a cycle failure at a signalized intersection occurs when the length of time of the green indication is not sufficient for all queued vehicles to travel through the intersection.

intersection operations is LOS D (Appendix F).

Table 30 Levels of Service at Study Intersections –Without Construction

		Existing Conditions (2022)				Future Conditions (2024)			
		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
Study Intersection	Control	Delay[1]	LOS	Delay[1]	LOS	Delay[1]	LOS	Delay[1]	LOS
Wheeler Avenue and 5th Street	TWSC	38.3	**E**	15.0	B	41.2	**E**	15.1	C
Wheeler Avenue and Bonita Street	Signal	27.2	C	17.9	B	28.7	C	18.1	B
Wheeler Avenue and 3rd Street	TWSC	32.6	D	13.7	B	55.4	**F**	14.8	B
Wheeler Avenue and Palomares Avenue	TWSC	24.9	C	12.5	B	25.7	D	12.7	B

LOS = level of service; TWSC = two-way stop control

Note: Bold values exceed City's criterion of LOS D. In some cases, project delay is less than without project. This is due to addition of project trips to non-critical movements and/or reduction in turning movements due to pass-by trips.

[1] For TWSC intersections, reported delay is for worst case movement

Source: Appendix F

3.5.3 Regulatory Framework

This section describes the plans, policies, and regulations related to transportation that are applicable to the proposed Program.

3.5.3.1 Federal

There are no federal regulations related to transportation that would be applicable to the proposed Program.

3.5.3.2 State

California Department of Transportation

Caltrans is responsible for the design, construction, maintenance, and operation of the California State Highway System as well as the portion of the Interstate Highway System within the state's boundaries. Caltrans is responsible for permitting and regulating the use of state freeways and highways. The regional freeways and highways in the Program site vicinity fall under the jurisdiction of Caltrans District 7 and include I-210, SR 210, and SR 57.

Caltrans' construction practices require temporary traffic control planning in accordance with the California Manual on Uniform Traffic Control Devices during any time the normal function of a roadway is suspended (Caltrans 2021). In addition, Caltrans requires that permits be obtained for transportation of oversized loads and certain materials as well as for construction-related traffic disturbance. Caltrans regulations would apply to the transportation of oversized construction equipment for the proposed Program.

Senate Bill 743

SB 743 was signed into law on September 27, 2013 and declares that "automobile delay, as described solely by level of service (LOS) or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment." It further directed the Office of Planning and Research (OPR) to develop revisions to the CEQA Guidelines to establish new criteria for determining the significance of transportation impacts. SB 743 changed the approach to transportation impact analysis under CEQA by establishing measures such as VMT, VMT per capita, or automobile trip generation rates as the primary measures of transportation impacts and eliminates the traditionally-used measures of automobile delay, LOS, and other measures of traffic congestion as the basis for determining significant impacts under CEQA.

Governor's Office of Planning and Research

In December 2018, OPR published its Technical Advisory on Evaluating Transportation Impact in CEQA (Technical Advisory) in response to SB 743. This document includes technical recommendations regarding the assessment of VMT, thresholds of significance, VMT mitigation measures, and screening thresholds for certain land use projects. Lead agencies may consider and use these recommendations at their discretion (OPR 2018). The VMT threshold guidance in OPR's Technical Advisory was based upon the CARB document titled 2017 Scoping Plan-Identified VMT Reductions and Relationship to State Climate Goals (CARB 2019). Consistent with that guidance, one of the thresholds for project-generated VMT is whether the project would result in a VMT per service population 15 percent below the "existing conditions" VMT per service population. As explained in the Technical Advisory (OPR 2018):

> Based on OPR's extensive review of the applicable research, and in light of an assessment by the CARB quantifying the need for VMT reduction in order to meet the State's long-term climate goals, OPR recommends that a per capita or per employee VMT that is 15 percent below that of existing development may be a reasonable threshold.
>
> Fifteen percent reductions in VMT are achievable at the project level in a variety of place types.
>
> Moreover, a 15 percent reduction is consistent with SB 743's direction to OPR to select a threshold that will help the State achieve its climate goals. As described above, [PRC] Section 21099 states that the criteria for determining significance must "promote the reduction in GHG emissions." In its document the CARB 2017 Scoping Plan-Identified VMT Reductions and Relationship to State Climate Goals, CARB assesses VMT reduction per capita consistent with its evidence-based modeling scenario that would achieve State climate goals of 40 percent GHG emissions reduction from 1990 levels by 2030 and 80 percent GHG emissions reduction levels from 1990 by 2050. Applying California Department of Finance population forecasts, CARB finds per-capita light-duty vehicle travel would need to be approximately 16.8 percent lower than existing, and overall per-capita vehicle travel would need to be approximately 14.3 percent lower than existing levels under that scenario. Below these levels, a project could be considered low VMT and would, on that metric, be consistent with 2017 Scoping Plan Update assumptions that achieve state climate goals…
>
> In summary, achieving 15 percent lower per capita (residential) or per employee (office) VMT than existing development is both generally achievable and is supported by evidence that connects this level of reduction to the State's emissions goals.

3.5.3.3 Local

2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

In addition to implementing SB 375 and reducing GHG emissions by integrating land use and transportation planning, SCAG is responsible for developing a long-range transportation plan that focuses on achieving a more mobile and sustainable region by connecting transportation networks, planning strategies, and people. In 2020, SCAG adopted Connect SoCal, which is its 2020-2045 RTP/SCS (SCAG 2020). The adoption of Connect SoCal is necessary to obtain and allocate federal funding for regional transportation projects. SCAG is required to update its RTP/SCS every four years pursuant to Title 23, United States Code Section 134 et seq.; Title 49, United States Code Section 5303 et seq.; and Title 23, Code of Federal Regulations Section 450 et seq (SCAG 2020). Federal approval of SCAG's RTP/SCS update is contingent, in part, on SCAG demonstrating that the RTP projects would not generate travel emissions that exceed those assumed in the SCAQMD AQMP.

City of La Verne

La Verne General Plan

The Program site is within La Verne and subject to the policies and requirements of the City's General Plan Transportation Element. The Transportation Element of the City's General Plan is aimed at making traffic flow smoothly and safely, protecting residential neighborhoods from adverse traffic impacts, promoting safe and convenient pedestrian and bike facilities, and allowing trucks, rail, and airplanes to serve the City conveniently and efficiently (City of La Verne 1998).

3.5.4 Thresholds and Methodology

3.5.4.1 Thresholds of Significance

Table 31 lists thresholds from Appendix G of the CEQA Guidelines that pertain to impacts associated with transportation, which are addressed in the Draft PEIR. It was determined in the NOP/Initial Study (Appendix A) that implementation of the proposed Program would have a less-than-significant impact related to emergency access. Therefore, no further analysis of threshold (d) is included in the Draft PEIR.

Table 31 CEQA Thresholds for Transportation

Threshold Would the proposed Program:
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
d. Result in inadequate emergency access?

Metropolitan has not adopted specific thresholds to use in making the determinations in Table 31. Therefore, in support of making the determination for thresholds (a) and (c), the analysis in this Draft PEIR uses the City's criterion for acceptable intersection operations of LOS D (Appendix F). To make the determination for threshold (b), the VMT screening criteria outlined in the transportation

impact guidelines of the City of Los Angeles and County of Riverside, and OPR's Technical Advisory (2018) were utilized (Appendix G).

3.5.4.2 Methodology

The analysis of proposed Program impacts to transportation is based on the Construction Traffic Impact Analysis (April 2023), Trip Generation and VMT Screening Analyses (March 2023), and Sedalia Avenue Access Evaluation (May 2023) prepared by Translutions, Inc. (Appendices F, G, and H). Each report presents a detailed discussion of the methodology used in evaluating impacts of the proposed Program, including methodology related to trip generation estimates, VMT screening procedures, and intersection operation analysis.

3.5.5 Impacts Analysis

3.5.5.1 Program Analysis

Threshold TRA-A: *Would the Program conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

The two primary plans that address the circulation system in the Program site vicinity are SCAG's RTP/SCS and the City's General Plan. Each of these plans addresses various modes of transportation, including vehicles, bicycles, pedestrian, and transit and includes objectives and policies related to these modes of transportation. In light of these plans, the following subsections qualitatively evaluate Program impacts related to construction and operational traffic and quantitatively evaluate Program impacts related to temporary intersection closures during construction of the Water Treatment Chemical Delivery Railroad Tracks Replacement Project.

Construction

Construction Traffic

Construction of the proposed Program would temporarily contribute to traffic on regional and local roadways due to construction worker vehicle trips and truck trips for material hauling. In particular, material hauling trucks may reduce roadway capacities (i.e., the ability of a road to accommodate traffic volumes) due to slower movements and larger turning radii of trucks compared to passenger vehicles. The proposed construction haul route for demolition and soil export as well as material delivery would use the Wheeler Avenue gate entrance/exit at the Weymouth Plant. Trucks would travel north on Wheeler Avenue to Foothill Boulevard and merge onto SR 210 or south on Wheeler Avenue to Arrow Highway and merge onto SR 57.[15] Construction traffic on residential streets would generally be avoided with the exception of the Water Treatment Chemical Delivery Railroad Tracks Replacement Project, which would require minor volumes of construction traffic on residential streets during temporary intersection closures. Construction-related trips would primarily occur during off-peak hours in the early morning and mid-day time periods and would thus largely avoid contributing to peak hour congestion. In addition, the Wheeler Avenue gate at the Weymouth Plant includes an approximately 315-foot-long entrance driveway, which would minimize the potential for construction trucks to queue along Wheeler Avenue. Also, the northbound approach on Wheeler Avenue leading up to this access gate includes a separate, approximately 80-foot-long left-turn lane, which would

[15] Construction traffic is not anticipated to utilize Moreno Avenue or Damien Avenue and therefore would not affect operations of the intersections of these roadways along Foothill Boulevard.

minimize the potential for construction trucks making left turns into the Weymouth Plant to obstruct through traffic on Wheeler Avenue. Furthermore, daily construction-related truck traffic on SR 210 and Foothill Boulevard (SR 66) would be approximately 30 truck trips per day during peak construction activities, which would be minor and approximately 0.02 percent and 0.1 percent of existing traffic volumes on SR 210 and Foothill Boulevard, respectively (Caltrans 2022). As such, truck traffic on these highways would not substantially affect intersection safety or queuing at on- and off-ramp intersections. Metropolitan and its construction contractor(s) would also be required to obtain applicable permits related to safe truck travel on Caltrans facilities (e.g., SR 210, SR 57, Foothill Boulevard [SR 66]). Therefore, Program construction traffic would not conflict with a program, plan, ordinance or policy addressing the circulation system, such as the SCAG RTP/SCS or the City's General Plan. Impacts would be **less than significant.**

Significance: Less than significant

Temporary Intersection and Trail Closures

Construction activities for the Water Treatment Chemical Delivery Railroad Tracks Replacement project may result in temporary closure of one or more lanes of the west legs[16] of the intersections of 5th Street, Bonita Avenue, 3rd Street, and Palomares Avenue along Wheeler Avenue. Although design activities are not complete, it is anticipated only one intersection would be affected by temporary traffic restrictions at a time as construction activities move along the railroad track alignment. Additionally, construction activities may occur during both daytime or nighttime hours and specific lane/street closures have not yet defined. Therefore, this analysis conservatively assumes the project would require full closures of the west legs of the affected intersections (as opposed to single lane restrictions or partial closures).

To determine how temporary traffic restrictions along Wheeler Avenue during construction of the Water Treatment Chemical Delivery Railroad Tracks Replacement project would affect the local circulation system, a Construction Traffic Evaluation Report was prepared (Appendix F). The report described an intersection LOS analysis for existing conditions and modeled future traffic volumes during year 2024 (the year in which construction of the Water Treatment Chemical Delivery Railroad Tracks Replacement project would begin) without the presence of temporary intersection closures during construction of the Water Treatment Chemical Delivery Railroad Tracks Replacement project ("Existing Conditions" and "Future Conditions," respectively). Intersection LOS for Existing Conditions and Future Conditions are shown in Table 30 in Section 3.5.2.3, *Level of Service*. The impacts associated with temporary closure of the west legs of these intersections along Wheeler Avenue during construction of this project were also modeled and are discussed in the following subsections. Additional detail on these construction-related impacts is provided in Appendix F.

Table 32 shows whether temporary closures of the west legs of the four intersections along Wheeler Avenue during construction of the Water Treatment Chemical Delivery Railroad Tracks Replacement project would cause the study area intersections to either 1) fall to below LOS D or 2) exacerbate operational deficiencies at intersections operating at LOS E or F under Without Construction (2024) conditions. As shown therein, the temporary closure of the west legs of the 3rd Street/Wheeler Avenue and 5th Street/Wheeler Avenue intersections would not substantially affect operations of study area intersections during peak hour conditions. However, temporary closure of the west leg of the Bonita Avenue/Wheeler Avenue would cause the 3rd Street/Wheeler Avenue, 5th Street/Wheeler Avenue, and Palomares Avenue/Wheeler Avenue intersections to either operate below LOS D or worsen existing operational deficiencies at these intersections during the AM peak hour. In addition, temporary closure of the west leg of the Palomares Avenue/Wheeler Avenue would worsen existing operational

[16] The term "leg" refers to the section of roadway that connects to a given intersection. For example, the intersection of Wheeler Avenue and 5th Street has four legs – north, south, east, and west, whereas the intersection of Wheeler Avenue and 2nd Street has three legs – north, south, and east.

deficiencies at the 3rd Street/Wheeler Avenue intersection during the AM peak hour. Furthermore, the existing bicycle route along Bonita Avenue and existing sidewalks on local roadways as well as Foothill Transit Line 492 stops along Bonita Avenue would be affected by the intersection closures and would need to be temporarily rerouted if traffic lanes, bicycle lanes, and/or sidewalks are closed. The County of Los Angeles Parks and Recreation's Marshall Canyon Trail also runs parallel and adjacent to the railroad tracks alignment and would be temporarily closed during construction activities for this project. Therefore, without mitigation, construction of the Water Treatment Chemical Delivery Railroad Tracks Replacement project would potentially conflict with a program, plan, ordinance or policy addressing the circulation system, such as the City's General Plan, and impacts would be **significant**. Implementation of MM TRA-1 (detailed in Section 3.5.5.3 [Mitigation Measure]), which involves implementation of a traffic management plan during construction, would be required. Further information on how this measure would reduce impacts to less than significant can be found in Section 3.5.5.3 (Mitigation Measure).

Significance after Mitigation: Less than significant.

Table 32 Anticipated Temporary Intersection Closure Impacts During Construction

	Potential to Cause Intersection Operations to Fall Below LOS D or Exacerbate Existing Deficiency?							
	3rd Street/Wheeler Avenue Intersection		Bonita Avenue/ Wheeler Avenue Intersection		5th Street/Wheeler Avenue Intersection		Palomares Avenue/Wheeler Avenue Intersection	
Location of Temporary Intersection Closure	AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour
West Leg of 5th Street/Wheeler Avenue	No	No	No	No	No	No	No	No
West Leg of Bonita Avenue/Wheeler Avenue	**Yes[1]**	No	No	No	**Yes[1]**	No	**Yes[2]**	No
West Leg of 3rd Street/Wheeler Avenue	No	No	No	No	No	No	No	No
West Leg of Palomares/Wheeler Avenue	**Yes[1]**	No	No	No	No	No	No	No

LOS = level of service

[1] Intersection currently operates at LOS E or F during the peak hour condition, and temporary intersection closure would worsen existing operational deficiency.

[2] Temporary intersection closure would cause intersection to operate below LOS D during the peak hour condition.

Source: Appendix F

Operation

During Program operation, approximately 39 additional daily vehicle trips to and from the Weymouth Plant associated with the five to ten new employees at the expanded Water Quality Laboratory building would occur (Appendix G). The volume of these additional vehicular trips would be minimal. In addition, these new employees would generate limited additional bicycle and pedestrian trips in the Program site vicinity if new employees live within biking/walking distance of the Weymouth Plant or if new employees choose to make bicycle/pedestrian trips during lunch breaks to commercial development along Foothill Boulevard, which is approximately 0.4 mile north of the Weymouth Plant. These low levels of additional vehicular, bicycle, and pedestrian trips would not have the potential to conflict with a program, plan, ordinance or policy addressing the circulation system, such as SCAG's RTP/SCS and the City's General Plan. In addition, as indicated in Section

2.8, *Operational Characteristics*, the New La Verne Warehouse Facilities project would not require additional equipment/material delivery trips; as such, no new truck trips would be added to the circulation system, and local/regional intersection operations and queuing at nearby highway on- and off-ramps would not be affected. Therefore, impacts would be **less than significant.**

Significance: Less than significant

Threshold TRA-B: *Would the Program conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?*

CEQA Guidelines Section 15064.3(b) identifies criteria for evaluating transportation impacts. Specifically, the guidelines state VMT exceeding an applicable threshold of significance may indicate a significant impact. According to CEQA Guidelines Section 15064.3(b), a lead agency has discretion to choose the most appropriate methodology to evaluate a project's VMT, and for many projects, a qualitative analysis of construction traffic may be appropriate.

Construction

As noted in Appendix G of this PEIR, neither OPR nor any jurisdiction in the local area requires an evaluation of VMT impacts during construction. Caltrans' *Transportation Analysis under CEQA, First Edition* guidance document indicates that a construction VMT analysis is typically only necessary for large projects or projects located a considerable distance from urbanized areas. The guidance also states that vehicle trips used for construction activities are temporary and the associated VMT is generally minor and limited to construction equipment and personnel with no long-term trip generation. The Program site is in an urbanized area, and the proposed Program would not involve large-scale construction activities that would have the potential to result in substantial increases in regional VMT because construction workers and materials would be primarily sourced locally. For projects requiring temporary lane or road closures, such as the Water Treatment Chemical Delivery Railroad Tracks Replacement project, the Caltrans guidance document states that although lane closures may result in out-of-direction travel in some cases as people seek to avoid the construction area, the reduction in capacity usually disincentivizes travel, thereby potentially reducing VMT. Moreover, the Program site vicinity has a roadway network with several parallel roadways such that lane closures during replacement of the water treatment chemical delivery railroad tracks would not substantially increase VMT due to rerouted trips (Appendix G). As such, Program construction would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b), and impacts would be **less than significant.**

Significance: Less than significant

Operation

The proposed Program would result in approximately five to ten new Metropolitan employees associated with the expanded Water Quality Laboratory building. Based on the standard trip generation for utility land uses published in the Institute of Transportation Engineers' *Trip Generation Manual* (11th Edition), each employee would generate approximately 3.85 daily trips on average. This trip generation rate includes employee commute trips, employee trips for other purposes (e.g., traveling to local restaurants and stores during lunch breaks to purchase lunch or run personal errands), and deliveries (e.g., mail, FedEx, Amazon) associated with typical operations. Conservatively assuming ten additional Metropolitan employees would be required for the proposed Program (3.85 average daily trips x 10 employees = 39 average daily trips), these additional employees are forecasted to generate approximately 39 average daily trips above existing baseline conditions, thereby resulting in additional VMT in the local area (Appendix G).

A select number of jurisdictions in Southern California (e.g., City of Los Angeles, County of Riverside) have adopted transportation impact guidelines stating that public services (e.g., police, fire stations, public utilities, public parks) do not generally generate substantial VMT during routine operations because these facilities are local-serving and put residents and businesses in closer proximity to needed services rather than inducing additional trips from outside the local area. As outlined in the transportation impact guidelines of the City of Los Angeles and County of Riverside, these land uses are instead often developed in response to development of other land uses (e.g., office, commercial, industrial, and residential). Therefore, public service land uses can be presumed to have less-than-significant impacts on VMT. The VMT generated by the proposed Program is considered related to a public utility as it relates to the provision of drinking water treatment, conveyance, and distribution (Appendix G). As a result, pursuant to this guidance, Program operation would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b)**.**

In addition, the OPR Technical Advisory includes screening criteria, thresholds of significance, methodologies, and mitigation measures for development projects. The screening criteria enable a variety of projects to be screened out of full VMT analyses because certain types of projects are presumed to result in a less-than-significant VMT impact due to the nature of the project and/or its location. The OPR classifies VMT evaluation into two project categories – transportation projects and land use projects. Transportation projects are projects that result in changes to the transportation system (e.g., transit, roadways, bike lanes) while land use projects are projects where land development (e.g., residential, retail, institutional, or employment-generating projects) occurs. The Program would be classified as a land development use project. The criteria for land use projects to be screened out from further VMT analysis include size, location, proximity to transit, or trip generation potential. The OPR Technical Advisory states that any project that generates less than 110 daily trips is considered to have a less-than-significant impact absent substantial evidence indicating a project would generate a potentially significant level of VMT or would be inconsistent with an SCS. The 110 daily trips threshold has been used and adopted by many jurisdictions, including the County of Los Angeles. The proposed Program is forecast to generate approximately 39 additional daily trips above existing operational baseline conditions at the Weymouth Plant, which is substantially less than the threshold of 110 daily trips. In addition, the Weymouth Plant is located within Transportation Analysis Zone (TAZ) 22422100 of the SCAG RTP/SCS model. The SCAG model indicates the base year employment for the TAZ is 1,557 and the future year employment is 1,750. The RTP/SCS anticipates growth of approximately 193 employees (1,750 – 1,557 = 193 new employees) for the TAZ in which the proposed Program is located. As mentioned, the proposed Program would require an additional five to ten new Metropolitan employees and would be consistent with the growth assumptions of the SCAG RTP/SCS. Therefore, the proposed Program is exempt from a detailed VMT analysis. As such, pursuant to OPR guidance, Program operation would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b), and impacts would be **less than significant.**

Significance: Less than significant

Threshold TRA-C: *Would the Program substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

Construction

Construction Equipment and Traffic

As described above under TRA-A, the proposed construction haul route for demolition and soil export as well as material delivery would use the Wheeler Avenue gate entrance/exit at the Weymouth Plant. Trucks would travel north on Wheeler Avenue to Foothill Boulevard and merge

onto SR 210 or south on Wheeler Avenue to Arrow Highway and merge onto SR 57. Construction traffic on residential streets would generally be avoided with the exception of the Water Treatment Chemical Delivery Railroad Tracks Replacement Project, which would require minor volumes of construction traffic on residential streets during temporary intersection closures. Construction-related trips would primarily occur during off-peak hours in the early morning and midday and would thus largely avoid contributing to peak hour congestion. In addition, the Wheeler Avenue gate at the Weymouth Plant includes an approximately 315-foot-long entrance driveway, which would minimize the potential for construction trucks to queue along Wheeler Avenue. Furthermore, the northbound approach on Wheeler Avenue leading up to this access gate includes a separate, approximately 80-foot-long left-turn lane, which would minimize the potential for construction trucks making left turns into the Weymouth Plant to obstruct through traffic on Wheeler Avenue. Construction equipment and staging/laydown would primarily occur within the boundaries of the Weymouth Plant with the exception of the Water Treatment Chemical Delivery Railroad Tracks Replacement Project, which would require the use of construction equipment in proximity to public roadways. However, temporary use of construction equipment in these areas along the railroad tracks would be carried out by construction personnel who have necessary training and/or certifications to operate such equipment, thereby minimizing any potential hazards due to the use of construction equipment. Therefore, construction equipment and traffic would not substantially increase hazards on the local transportation network due to geometric design features or incompatible uses, and impacts would be **less than significant.**

Significance: Less than significant

Temporary Intersection and Trail Closures

As detailed under TRA-A, the proposed Program would require temporary closures of the west legs of intersections along Wheeler Avenue during construction for the Water Treatment Chemical Delivery Railroad Tracks Replacement project. Temporary intersection closures could potentially increase hazards on the local transportation network if traffic is not properly rerouted during the closures of the west legs of Bonita Avenue and Palomares Avenue because these closures would contribute substantially to congested intersection conditions. Furthermore, Foothill Transit Line 492 includes stops along Bonita Avenue that would be affected by this intersection closure and would need to be temporarily rerouted. The County of Los Angeles Parks and Recreation's Marshall Canyon Trail also runs parallel and adjacent to the railroad tracks alignment and would be temporarily closed during construction activities for this project. Therefore, impacts would be **significant**. Implementation of MM TRA-1 (detailed in Section 3.5.5.3 [Mitigation Measure]) would be required. Further information on how this measure would reduce impacts to less than significant can be found in Section 3.5.5.3 (Mitigation Measure).

Significance after Mitigation: Less than significant.

Operation

Operation and maintenance activities at the Weymouth Plant would largely remain the same as under existing conditions upon implementation of the proposed Program. The approximately 39 additional vehicle trips associated with the five to ten new employees would not represent an incompatible use on the local transportation network, and no additional heavy truck trips would occur as a result of the New La Verne Warehouse Facilities project. The proposed Program includes installation of a new employee access gate along Sedalia Avenue near its intersection with Forestdale Street, which would be secondary to the main employee access gate on Moreno Avenue and would primarily be utilized by employees working at the nearby Water Quality Laboratory building. Approximately ten employees are expected to use this access gate each day during normal Metropolitan operational hours, and access would be granted through the use of a keycard. Design and construction of this

access gate would be required to comply with the design and safety standards of the La Verne Municipal Code Section 12.16.030, which incorporates by reference the Standard Specifications of Public Works Construction. The Sedalia Avenue Access Evaluation report prepared by Translutions indicates sufficient gaps in existing traffic volumes would be available for vehicles to turn into and out of the proposed driveway, and constructing a new access gate on Sedalia Avenue would not warrant installation of a traffic signal pursuant to Caltrans' Manual on Uniform Traffic Control Devices (Appendix H). Vehicles exiting the Weymouth Plant to Sedalia Avenue would have clear lines of sight[17] based on the recommendations of the American Association of State Highway and Transportation Officials and thus would not create unsafe conditions (Appendix H). Furthermore, the proposed access gate would be set back approximately 20 feet from Sedalia Avenue in accordance with the recommendations of the Sedalia Avenue Access Evaluation report, which would allow for sufficient space for one vehicle to queue at the gate at any given time while another vehicle waits for keycard access to be granted to the plant (Appendix H).

Compliance with these standards would minimize the potential for this new access gate to create a traffic hazard due to a geometric design feature. Furthermore, the proposed Program would not alter the existing geometric design of streets (i.e., street curbs, street widths, etc.) surrounding the Weymouth Plant. Therefore, Program operation would not substantially increase hazards due to a geometric design feature or incompatible uses, and impacts would be **less than significant.**

Significance: Less than significant

3.5.5.2 Cumulative Analysis

Cumulative impacts consider impacts at the Program site together with similar impacts of existing development and reasonably anticipated projects in the Program site vicinity. The general approach to cumulative impact analysis used in this Draft PEIR is discussed in Section 3, *Environmental Impact Analysis and Mitigation Measures*, and cumulative projects are listed in Table 4 of this section. The geographic scope for analyzing cumulative transportation impacts is the local transportation network in the immediate vicinity of the Program site and VMT in the broader Southern California region.

Although some cumulative projects in the surrounding area may be under construction at the same time as the proposed Program, the majority of these projects are not located within 0.25 mile of the Program site such that construction of these projects would impact the same local roadways and intersections as those affected by Program construction. The Foothill Gold Line extension is currently under construction in the Program site vicinity with construction anticipated to be complete in 2025 (Foothill Gold Line 2023). Construction activities associated with this project could be occurring at the same time as construction of the Water Treatment Chemical Delivery Railroad Tracks Replacement project. However, construction activities related to the Foothill Gold Line are occurring primarily in the existing railroad right-of-way, and impacts to the local transportation network near the Program site would be short-term and temporary given that they would be limited to the Wheeler Avenue and intersection crossings immediately north of Arrow Highway.

A component of Pure Water Southern California at the Weymouth Plant may be under construction at the same time as the Water Quality Laboratory Building Improvements, Basins Nos. 1 and 2 Rehabilitation, and/or New Field Engineering Building projects. Construction-related traffic associated with Pure Water Southern California could affect the same local roadways as the proposed Program, depending on the ultimate location of these construction activities within the Weymouth Plant boundaries. However, as with the proposed Program, construction-related trips for Pure Water Southern California would likely use the same regional and local roadways to access the Weymouth

[17] For the purposes of this analysis, a vehicle's line of sight is evaluated from the point at which a vehicle exiting the proposed access point would stop prior to turning right or left out of the driveway.

Plant, thus avoiding residential streets, and would primarily occur during off-peak hours in the early morning and mid-day time periods and would largely avoid contributing to peak hour congestion. In addition, the long entrance driveway at the Wheeler Avenue gate and the separate left-turn lane on Wheeler Avenue leading up to this access gate would minimize the potential for construction trucks for the proposed Program and Pure Water Southern California to obstruct through traffic on Wheeler Avenue. Furthermore, a separate PEIR is being prepared for Pure Water Southern California, which will include mitigation measures to address potentially significant impacts to transportation, if any are identified. Therefore, cumulative impacts related to construction traffic would be **less than significant.**

Buildout of cumulative development within and near the Program site vicinity, including the projects listed in Table 4 in Section 3, *Environmental Impact Analysis and Mitigation Measures*, would increase traffic volumes on local roadways as compared to existing conditions. The cumulative increase in traffic would have the potential to conflict with plans, programs, ordinances, and policies addressing the circulation system and to substantially increase VMT. Therefore, cumulative operational traffic impacts would be **significant**. However, the minor amount of additional employee trips generated by the proposed Program would be negligible in comparison to the high volumes of traffic and VMT generated by the types of residential, commercial, and industrial projects listed in Table 4 and would have a minimal effect on the local circulation system and regional VMT. As a result, the proposed Program's contribution to significant cumulative operational transportation impacts would **not be cumulatively considerable (less than significant)**.

The projects listed in Table 4 in Section 3, *Environmental Impact Analysis and Mitigation Measures*, are primarily residential and small commercial projects with low potential to substantially increase traffic hazards due to geometric design features or incompatible uses. Therefore, cumulative impacts related to traffic hazards would be **less than significant.**

Cumulative Significance: Cumulative impacts related to conflicts with plans, programs, ordinances, and policies addressing the circulation system and VMT during operation would be significant, but the proposed Program's contribution would **not be cumulatively considerable (less than significant)**. Cumulative impacts related to conflicts with plans, programs, ordinances, and policies addressing the circulation system and VMT during construction would be **less than significant**. Cumulative impacts related to traffic hazards would be **less than significant**.

3.5.5.3 Mitigation Measures

Implementation of MM TRA-1 would be required for the proposed Program. In addition to this mitigation measure, the project contractor(s) would be required to comply with Metropolitan standard practices related to traffic control plans as outlined in Section 01065 of the construction contractor specifications.

Mitigation Measure TRA-1 Traffic Management Plan

TRA-1. Prior to the start of construction of the Water Treatment Chemical Delivery Railroad Tracks Replacement project, a Traffic Management Plan (TMP) shall be prepared to minimize the disruption to traffic during construction and to guide vehicles to the preferred detour routes.

The TMP shall remain active throughout construction of the Water Treatment Chemical Delivery Railroad Tracks Replacement project. The TMP shall be updated, as needed, to address congestion at or near the construction site. The TMP shall include a Public Awareness Campaign, Motorist Information Strategies, Incident Management, and Contingency Plans.

In addition, the TMP shall include the following specific information:

- Placement of temporary street closure warning signage along Wheeler Avenue, Bonita Avenue, and other streets, as needed, to warn drivers of upcoming construction activities
- Placement of detour signs to redirect vehicle traffic
- Identification of construction staging locations and intersection closures, alternate routes for detours, and planned truck routes for construction-related traffic
- Identification of alternative safe routes to maintain safety along bicycle and pedestrian routes during construction
- Description of traffic control measures (i.e., flag persons, warning signs, lights, barricades, cones, detour routes) to provide safe passage for vehicular, bicycle and pedestrian traffic

In addition, Metropolitan shall provide notice to impacted residents and interested parties (i.e., City of La Verne, Los Angeles County Parks and Recreation, Foothill Transit, and local schools such as Grace Miller Elementary School, Damien High School, and the Joan Macy School) regarding intersection closures.

Implementation of MM TRA-1 would minimize conflicts with programs, plans, ordinances, and policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities during construction of the Water Treatment Chemical Delivery Railroad Tracks Replacement project and would reduce the potential for these construction activities to substantially increase hazards along the local transportation network through preparation/implementation of a TMP, which would provide appropriate notice of intersection closures through detour signs and other means and reduce congestion. Therefore, impacts would be **less-than-significant with mitigation incorporated**.

Significance after Mitigation: Less than significant

3.6 Tribal Cultural Resources

3.6.1 Introduction

This section describes the existing conditions and regulatory framework as they pertain to Tribal Cultural Resources (TCRs) and addresses the potential for implementation of the proposed Program to result in impacts to TCRs. This section includes a summary of the tribal consultation conducted by Metropolitan. Copies of communications from the tribal consultation process are provided as Appendix I.

PRC Sections 21074(a)(1) and (2) define TCRs as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" that are either 1) included or determined to be eligible for inclusion in the CRHR or included in a local register of historical resources or 2) a resource that is determined to be significant by a CEQA lead agency, in its discretion and supported by substantial evidence, including the significance of the resource to a California Native American tribe. Pursuant to PRC Section 21074(b), a cultural landscape that meets the criteria of PRC Section 21074(a) can also be a TCR to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. PRC Section 21074(c) also provides that a historical resource described in PRC Section 21084.1, a unique archaeological resource as defined in Section 21083.2(g), or a "nonunique archaeological resource" as defined in Section 21083.2(h) may also be a TCR if it conforms with the criteria of PRC Section 21074(a).

3.6.2 Existing Conditions

The proposed Program site is located within the traditional territories of numerous Native American tribal groups. Metropolitan received formal notification for consultation from the following four California Native American tribes that are traditionally and culturally affiliated with the geographic area of the Program:

- Gabrieleño Band of Mission Indians-Kizh Nation
- San Gabriel Band of Mission Indians
- Soboba Band of Luiseño Indians
- Yuhaaviatam of San Manuel Nation (formerly San Manuel Band of Mission Indians)

3.6.3 Regulatory Framework

This section describes the plans, policies, and regulations related to tribal cultural resources that are applicable to the proposed Program.

3.6.3.1 Federal

No existing federal laws or regulations related to TCRs are applicable to the proposed Program.

3.6.3.2 State

California Public Resources Code Sections 21080.3.1 and 21080.3.2

PRC Section 21080.3.1(b-d) requires that, within 14 days of a lead agency determining an application for a project is complete or a decision by a public agency to undertake a project, the lead agency must provide formal notification to the designated contact, or a tribal representative, of California Native American tribes that are traditionally and culturally affiliated with the geographic area of the project (as defined in PRC Section 21073) and who have requested in writing to be informed by the lead agency of projects within their geographic area of concern. Tribes interested in consultation must respond in writing within 30 days from receipt of the lead agency's formal notification, and the lead agency must begin consultation within 30 days of receiving the tribe's request for consultation (PRC Section 21080.3.1(d-e).

Pursuant to PRC Section 21080.3.2(b), consultation is considered concluded when either (1) the parties agree to measures to mitigate or avoid a significant effect, if a significant effect to a TCR exists or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.

California Public Resources Code Section 21082.3(c)

PRC Section 21082.3(c)(1) states that any information, including, but not limited to, the location, description, and use of a TCR, that is submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public without the prior consent of the tribe that provided the information. If the lead agency publishes any information submitted by a California Native American tribe during the consultation or environmental review process, that information shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.

Pursuant to PRC Section 21082.3(c)(2)(B), confidentiality does not apply to data or information that are or become publicly available, are already in lawful possession of the project applicant before the provision of the information by the California Native American tribe, are independently developed by the project applicant or the applicant's agents, or are lawfully obtained by the project applicant from a third party that is not the lead agency, a California Native American tribe, or another public agency.

3.6.4 Thresholds and Methodology

3.6.4.1 Thresholds of Significance

Table 33 lists thresholds from Appendix G of the CEQA Guidelines that pertain to impacts associated with tribal cultural resources. These thresholds are addressed in the Draft PEIR.

Table 33 CEQA Thresholds for Tribal Cultural Resources

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

3.6.4.2 Methodology

The analysis in this section is based on the results of the tribal consultation process conducted by Metropolitan. Copies of communications from the tribal consultation process are provided as Appendix I.

Metropolitan initiated tribal cultural resource consultation on December 5, 2022, by mailing letters via certified mail to the following four Native American tribes that have requested notification of Metropolitan projects in the geographic area in which they are traditionally and culturally affiliated:

- Gabrieleño Band of Mission Indians-Kizh Nation
- San Gabriel Band of Mission Indians
- Soboba Band of Luiseño Indians
- Yuhaaviatam of San Manuel Nation (formerly San Manuel Band of Mission Indians)

Each letter included the proposed Program location, Program description, maps, and results of the CHRIS search, SLF search, and field survey. Furthermore, the letters stated tribal contacts had 30 days from receipt of the letter to request, in writing, consultation regarding the proposed Program.

Metropolitan received an email from Cultural Resource Analyst Ryan Nordness of the Yuhaaviatam of San Manuel Nation on January 13, 2023. The letter stated the Program site is located within Serrano ancestral territory and is of interest to the Tribe. The letter further stated that due to the nature and location of the proposed Program and the present state of knowledge of the Tribe's Cultural Resources Management Department, the Yuhaaviatam of San Manuel Nation did not have any concerns with implementation of the proposed Program, as currently planned. The Yuhaaviatam of San Manuel Nation requested the inclusion of three cultural resources mitigation measures, which consisted of the following:

- In the event cultural resources are discovered during Program activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease until the find can be assessed by a qualified archaeologist. Additionally, if discovered, the tribe shall be notified regarding any pre-contact and/or historic-era cultural resources, so as to be provided the opportunity to provide input for significance and treatment
- Implementation of a Monitoring and Treatment Plan with archaeological monitoring in the event a significant pre-contact and/or historic-era cultural resource is identified with review by the Tribe
- Implementation of procedures in the event human remains or funerary objects are encountered pursuant to California Health and Safety Code Section 7050.5

The Yuhaaviatam of San Manuel Nation also requested mitigation measures for TCRs, which consisted of the following:

- Tribal notification and input with regard to significance and treatment if any pre-contact and/or historic-era cultural resources are discovered during Program implementation and implementation of a cultural resources Monitoring and Treatment Plan with Native American monitoring in the event a significant resource is identified
- Submittal of all archaeological/cultural documentation prepared for the Program to Yuhaaviatam of San Manuel Nation and consultation with Yuhaaviatam of San Manuel Nation throughout the life of the Program

On March 27, 2023, Metropolitan Senior Environmental Specialist Michelle Morrison, MA, RPA, contacted Mr. Nordness via telephone to discuss the Tribe's proposed mitigation measures. Mr. Nordness noted the TCR mitigation measure requesting archaeological/cultural documents prepared for the Program is applicable only if there is an unanticipated find that requires preparation of a report (e.g., excavation report, Department of Parks and Recreation forms) and that the Tribe is not interested in receiving a copy of the Draft PEIR or the built environment study prepared for the proposed Program. Ms. Morrison stated that some of the mitigation measures proposed by the Tribe are generally consistent with the standard procedures Metropolitan implements for all projects (Section 01065 of Metropolitan's construction contractor specifications), including procedures to follow in the event archaeological resources are unexpectedly encountered during construction and procedures to follow in the event human remains are unexpectedly encountered, pursuant to California Health and Safety Code Section 7050.5. In an email dated March 27, 2023, Mr. Nordness stated the Tribe concurred with use of Metropolitan's standard procedures in its construction contractor specifications for the proposed Program.

No additional tribal cultural resource consultation requests were received during the consultation period.

3.6.5 Impacts Analysis

3.6.5.1 Program Analysis

Threshold TCR-A(i): *Would the proposed 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 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)?*

Threshold TCR-A(ii): *Would the proposed 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 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?*

Metropolitan sent tribal cultural resource consultation request letters to four tribes in December 2022, pursuant to PRC 21080.3.1(b)(1). The tribal cultural resource correspondence record is summarized

under Section 3.6.4.2, *Methodology*, and the letters sent and responses received are included as Appendix I.

No tribal cultural resources were identified during the tribal cultural resource consultation process. Additionally, Metropolitan would implement its standard practices related to the protection of archaeological resources as outlined in Section 01065 of the construction contractor specifications (see Section 2.6, *Construction Characteristics*). Adherence to Metropolitan's standard practices in the unlikely event of unanticipated discovery of an archaeological resource, including an archaeological resource that could also be a TCR, would result in the protection of a resource should one be discovered. Therefore, the proposed Program would not cause a substantial adverse change in the significance of a TCR, and **no impact** would occur.

Significance: No Impact

3.6.5.2 Cumulative Analysis

Cumulative impacts consider impacts at the Program site together with similar impacts of existing development and reasonably anticipated projects in the Program site vicinity. The general approach to cumulative impact analysis used in this Draft PEIR is discussed in Section 3, *Environmental Impact Analysis and Mitigation Measures*, and cumulative projects are listed in Table 4 of this section. The geographic scope of this resource area consists of the Weymouth Plant and the surrounding region.

The proposed Program, in conjunction with other nearby past, present, and reasonably foreseeable probable future projects in the region as discussed in Section 3, *Environmental Impact Analysis and Mitigation Measures*, would continue to disturb areas with potential TCRs. Given the potential for cumulative development to result in substantial adverse changes in the significance of these potential TCRs, cumulative impacts to TCRs would be **significant.**

However, as described under TCR-A(i) and TCR-A(ii), Metropolitan did not receive a response during the tribal cultural resource consultation process indicating that a TCR was located at the Program site. In addition, the project contractor(s) for the proposed Program would be required to comply with Metropolitan standard practices related to the protection of archaeological resources as outlined in Section 01065 of the construction contractor specifications (see Section 2.6, *Construction Characteristics*). Adherence to Metropolitan's standard practices in the unlikely event of unanticipated discovery of an archaeological resource, including an archaeological resources that could also be a TCR, would result in the protection of a resource should one be discovered. Therefore, because no TCRs are located within the proposed Program site, the proposed Program's contribution to this significant cumulative impact would **not be cumulatively considerable (less than significant)**.

Cumulative Significance: Cumulative impacts to tribal cultural resources **would be significant**, but the proposed Program's contribution would **not be cumulatively considerable**.

3.6.5.3 Mitigation Measures

No mitigation measures would be required because no impacts to TCRs would occur. The project contractor(s) would be required to comply with Metropolitan standard practices related to the protection of archaeological resources as outlined in Section 01065 of the construction contractor specifications in the event of an unanticipated discovery of archaeological resources, including those that may be considered TCRs by locally affiliated California Native Americans (see Section 2.6, *Construction Characteristics*).

4 Other Required CEQA Discussion

CEQA requires an EIR to evaluate a project's foreseeable effects in relationship to other broader changes that may be occurring in the environment (CEQA Guidelines Section 15126; PRC Section 21002.1). Accordingly, this chapter includes a discussion of the other CEQA-mandated analyses, including the following:

- Section 4.1, Significant and Unavoidable Environmental Impacts (CEQA Guidelines Section 15126.2[c] [Significant Environmental Effects Which Cannot be Avoided if the Proposed Project is Implemented])
- Section 4.2, Significant and Irreversible Environmental Impacts (CEQA Guidelines Section 15126.2[d] [Significant Irreversible Environmental Changes Which Would be Caused by the Proposed Project Should it be Implemented])
- Section 4.3, Growth Inducement (CEQA Guidelines Section 15126.2[e] [Growth-Inducing Impact of the Proposed Project])

The requirements of CEQA Guidelines Section 15126.2(a) (Significant Environmental Effects) are addressed throughout Sections 3.1 to 3.6 of the Draft PEIR, and the requirements of CEQA Guidelines Section 15126(b) (Energy Impacts) are addressed in Section 3.6 of the Initial Study, included as Appendix A. As such, no further discussion of these topics are included in this chapter.

4.1 Significant and Unavoidable Environmental Impacts

CEQA Guidelines Sections 15126(b) and 15126.2(c) require an EIR to describe any significant impacts, including those that can be mitigated but not to a less-than-significant level, the implications of any impacts that cannot be avoided, and reasons why the project is being proposed, despite these effects.

One resource area is identified for which the proposed Program may have the potential for significant and unavoidable impacts – noise. Implementation of mitigation measure NOI-1 would reduce environmental impacts to the extent feasible. However, even with implementation of MM NOI-1 (detailed in Section 3.4.5.3 [Mitigation Measure]), construction noise associated with the proposed Program would continue to exceed the established daytime and nighttime thresholds of significance at varying points during Program construction, and there are no additional feasible noise reduction measures that would further reduce this impact. In addition, installation of temporary noise barriers between noise-sensitive receivers and the construction site for the Water Treatment Chemical Delivery Railroad Replacement project may not be feasible in all circumstances due to space and worker safety constraints, the mobile nature of track replacement activities, and the need to minimize the duration of closures of the west legs of intersections along Wheeler Avenue. As a result, construction noise impacts from all proposed Program components, with the exception of the New Field Engineering Building, would remain **significant and unavoidable**.

Table 34 lists the potential significant and unavoidable impact as well as the mitigation measure proposed for this impact (see Section 3.4, *Noise*, for further discussion).

Table 34 Significant and Unavoidable Impact and Mitigation Measure

Impact	Significance Before Mitigation	Mitigation	Significance After Mitigation
NOI-A: Construction activities associated with implementation of the proposed Program may result in generation of a substantial temporary increase in ambient noise levels. This impact would be potentially significant.	Significant	NOI-1: Construction Noise Reduction Measures	Significant and unavoidable

4.2 Significant Irreversible Environmental Changes

Pursuant to CEQA Guidelines Section 15126.2(d), an EIR must consider any significant irreversible environmental changes that would be caused by the proposed Program. Specifically, CEQA Guidelines Section 15126.2(d) describes significant irreversible environmental changes as follows:

> Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as a highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified (14 California Code of Regulations 15126.2[d]).

Implementation of the proposed Program would result in both short- and long-term commitments of natural resources. Construction and operation of the proposed Program would require the use and consumption of nonrenewable resources, such as steel and other metals. Renewable resources, such as lumber and other wood byproducts, would also be used. Unlike renewable resources, nonrenewable resources cannot be regenerated over time. Because the nature of the proposed Program is mostly for the rehabilitation and improvement of existing infrastructure and buildings, the requirement for building materials would be reduced when compared to other similar sized projects. The quantity of building materials used during implementation of the proposed Program would not result in a significant impact because these types of resources are anticipated to be available in adequate supply into the foreseeable future.

Energy would be consumed during both construction and operation of the proposed Program. Nonrenewable resources and energy would also be consumed during the manufacturing and transportation of building materials, preparation of the site, and construction and rehabilitation activities. As discussed in the NOP/Initial Study (Appendix A), the proposed Program would not result in the wasteful, inefficient, or unnecessary consumption of energy during construction or operation. In addition, the proposed Program includes sustainability features to minimize energy and water consumption and GHG emissions. These design features include, but are not limited to, upgrading electrical fixtures; using water-efficient fixtures; designing to achieve LEED Gold certification for the Water Quality Laboratory Building Improvements project and LEED Silver certification for the New Field Engineering Building project; and installing energy-efficient appliances and lighting, double-glazed and low-emittance windows, water-efficient toilets and sinks, drought-tolerant landscaping, and LED lighting. However, the proposed Program would result in the irreversible commitment of energy resources in the form of diesel fuel, gasoline and electricity during construction and operation. Nevertheless, these types of resources are anticipated to be available in adequate supply into the foreseeable future. Therefore, the use of construction materials and

nonrenewable resources for implementation of the proposed Program would not be unusual or extraordinary and would not negatively impact the availability of these resources. Therefore, impacts due to these irreversible commitments of environmental resources would be **less than significant**.

4.3 Growth Inducement

CEQA Guidelines Section 15126.2(e) requires a discussion of a proposed project's potential to foster economic or population growth, including ways in which a project could remove an obstacle to growth. Growth itself does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. Generally, a project may be considered growth-inducing if it results in one or more of the conditions identified below:

- Induces population growth;
- Induces economic expansion;
- Establishes a precedent-setting action (e.g., an innovation, a radical change in zoning or general plan designation);
- Results in development or encroachment in an isolated or adjacent area of open space (i.e., being distinct from "infill" development); or
- Removes an impediment to growth (e.g., the establishment of an essential public service or the provision of new access to an area).

A proposed project's growth-inducing potential is considered significant if project-induced growth could result in significant physical effects in one or more environmental resource areas. As discussed in the following subsections, the proposed Program would not induce population growth, induce economic expansion, establish a precent-setting action, result in development or encroachment in an isolated or adjacent area of open space, or remove an impediment to growth. As such, the proposed Program's growth-inducing potential would be **less than significant**.

4.3.1 Population Growth

As discussed in the NOP/Initial Study (Appendix A), implementation of the proposed Program would not involve the construction of residential development that would have the potential to directly foster population growth. Program construction activities would be temporary, intermittent, and not expected to create substantial additional employment opportunities beyond what is typically available to construction workers in the area. Operation of the expanded Water Quality Laboratory would require approximately five to ten additional Metropolitan employees. However, these employees would be sourced from the region's existing workforce and would not induce substantial population growth in Los Angeles County. Consequently, the proposed Program would not directly result in population growth. In addition, the proposed Program does not include the construction of new water supply facilities and would not increase the treatment capacity of the Weymouth Plant. Therefore, the proposed Program would not result in an increase in potable water supplies that could indirectly induce population growth in the region.

4.3.2 Economic Expansion

Implementation of the proposed Program would involve construction activities that would likely be performed by workers hired from the local region. Because construction workers would be expected to be drawn from the existing regional workforce, Program construction activities would not induce

economic expansion from a temporary employment standpoint. In addition, as indicated in Section 4.3.1, *Population Growth*, although operation of the expanded Water Quality Laboratory would require approximately five to ten additional Metropolitan employees, these employees would be sourced from the region's existing workforce and therefore would not induce substantial economic expansion in Los Angeles County. As a result, the proposed Program would not induce growth from an economic expansion standpoint.

4.3.3 Precedent-Setting Action

The proposed Program does not require any General Plan or zoning amendments, does not include the construction of new water supply facilities, and would not increase the treatment capacity of the Weymouth Plant. Rather, the proposed Program involves upgrading existing infrastructure and enhancing/improving existing operations of the Weymouth Plant. As discussed above and in the NOP/Initial Study (Appendix A), the proposed Program would not result in substantial population growth either directly or indirectly. As such, the proposed Program would not set a precedent that would result in new growth-inducing impacts in the area.

4.3.4 Development of Open Space/Vacant Land

Development of open space is considered growth-inducing when it occurs outside urban boundaries or in isolated locations instead of infill areas. The Program site is located in an urbanized, built-out area and does not involve development of open space or vacant land in isolated areas that could induce growth at the periphery of developed areas. As such, the proposed Program would not involve development of open space or vacant land such that growth-inducing impacts would occur.

4.3.5 Removal of an Impediment to Growth

The proposed Program consists of improvements and upgrades to Metropolitan's existing Weymouth Plant and does not include the construction of new water supply facilities or the expansion of treatment capacity at the Weymouth Plant. In addition, the proposed Program would not extend public roadways or other utilities to areas currently lacking these services. Accordingly, the proposed Program would not remove existing obstacles to growth within the Program site vicinity.

5 Alternatives

5.1 Introduction

CEQA requires alternatives that could avoid or lessen the project's significant effect(s) be considered (CEQA Guidelines Section 15126.6). This chapter presents potential alternatives to the proposed Program and evaluates them as required by CEQA. According to the CEQA Guidelines, an EIR must describe a range of reasonable alternatives to a proposed project which would feasibly attain most of the basic project objectives and would avoid or substantially lessen any of a proposed project's significant environmental effects. CEQA Guidelines Section 15126.6(f) provides direction on the required alternatives analysis:

> The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.

An EIR is not required to consider every conceivable alternative to a project. Rather, the alternatives must be limited to those which meet the project objectives, are feasible, and would avoid or substantially lessen at least one of the significant environmental effects of the project. Feasible refers to a project being capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors. CEQA Guidelines Section 15126.6(b) provides further clarify on the selection of alternatives for evaluation:

> Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (PRC Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

CEQA Guidelines Section 15126.6(d) provides further guidance on the extent of evaluations of alternatives:

> The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed. (*County of Inyo v. City of Los Angeles* (1981) 124 Cal.App.3d 1).

An EIR must briefly describe the rationale for the selection and rejection of alternatives, including a presentation of information a lead agency relied on when selecting alternatives. An EIR should also identify any alternatives considered but rejected as infeasible by the lead agency during the scoping process, and briefly explain the reasons for exclusion. Alternatives may be eliminated from detailed consideration in the EIR if they fail to meet most of the project objectives, are infeasible, or do not avoid any significant environmental effects.

CEQA Guidelines Section 15126.6(e)(1) also requires the "No Project alternative" to be addressed in an alternatives analysis. The purpose of evaluating the No Project alternative is to allow decision-makers to compare the potential consequences of a project with the consequences that would occur without implementation of a project.

Finally, an EIR must identify an environmentally superior alternative. The No Project alternative may be environmentally superior to a project based on the minimization or avoidance of physical environmental impacts. However, the No Project alternative must also achieve the project objectives in order be selected as the environmentally superior alternative. CEQA Guidelines Section 15126.6(e)(2) state if the No Project alternative is designated as the environmentally superior alternative, then the EIR must identify an environmentally superior alternative among the other alternatives (including the proposed Program). The environmentally superior alternative is identified in Section 5.5, *Identification of the Environmentally Superior Alternative*.

5.2 Summary of Program Objectives and Significant Impacts

5.2.1 Program Objectives

The overall objectives of the proposed Program include the following:

- Upgrade aging infrastructure to ensure safe drinking water for years to come
- Install new, more-efficient treatment technologies to meet more stringent drinking water standards
- Enhance features of the Weymouth Plant to improve seismic safety and ADA compliance and to protect public safety and the environment
- Ensure continued compliance with recent federal and state drinking water quality regulations and compliance with anticipated future regulations applicable to the Weymouth Plant
- Build new or improve existing facilities to enhance worker safety, ensure plant reliability, and facilitate efficient operations and maintenance of the Weymouth Plant

The objectives for each project included in the proposed Program are outlined in the following sections.

Water Quality Laboratory Building Improvements

- Maintain reliable operation and meet current seismic design practices and code requirements
- Improve existing laboratory spaces through building functional improvements and equipment upgrades
- Provide additional laboratory space required to carry out current and future essential water quality monitoring and research
- Achieve LEED Gold certification, or higher

Administration and Control Buildings Seismic Upgrade and Building Improvements

- Maintain reliable operation and meet current seismic design practices and code requirements
- Retain as many character-defining features of the Administration and Control buildings as feasible while maintaining the buildings' functionality
- Increase operational efficiency by improving existing functional space through electrical upgrades and office space reconfigurations

Water Treatment Chemical Delivery Railroad Tracks Replacement

- Upgrade and maintain the water treatment chemical delivery railroad tracks to comply with BNSF requirements for safe and reliable delivery of water treatment chemical railcars
- Maintain and enhance worker and industrial safety standards

Basin Nos. 1 and 2 Rehabilitation

- Minimize the risk of future system failures and major rehabilitation work
- Update and modernize the existing basins according to current standards
- Improve operational reliability, performance, and capacity to meet current and future water processing demands

New La Verne Warehouse Facilities

- Maintain reliable operation of Metropolitan's central warehouse facility, and meet current seismic design practices and code requirements
- Protect existing assets and warehouse inventory, increase operational efficiency, and reduce expenditures by providing adequate indoor and covered outdoor storage space for the storage of critical inventory

New Field Engineering Building

- Construct a new field engineering building that meets the latest building codes and Metropolitan standards for seismic resiliency, safety, and sustainability
- Increase and maintain capability to perform laboratory analysis (e.g., soils, concrete, corrosion, material, and coatings testing) that supports Metropolitan construction standards
- Achieve LEED Silver certification, or higher

5.2.2 Review of Significant Environmental Impacts

As discussed in Section 5.1, *Introduction*, the range of alternatives required to be evaluated in an EIR is limited to those alternatives that would avoid or substantially lessen any significant effects of the proposed Program and would feasibly attain most of the proposed Program's objectives.

The proposed Program would potentially result in the following significant impact (or potentially significant impact) that could not be reduced to a less-than-significant level with mitigation (i.e., a significant and unavoidable impact), as described in Chapter 3.4, *Noise*, and Chapter 4, *Other Required CEQA Discussion*:

- Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies (NOI-A)

5.3 Alternatives Considered but Rejected

CEQA Guidelines Section 15126.6(a) states that an EIR shall describe "a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project," as well as provide an evaluation of "the comparative merits of the alternatives." The proposed Program has a significant and unavoidable construction noise impact. Therefore, alternatives should focus on reducing impacts related to construction noise. Under CEQA Guidelines Section 15126.6(a), an EIR does not need to consider alternatives that are not feasible and does not need to address every conceivable alternative to the project. CEQA Guidelines Section 15126.6(f) states that the range of alternatives "is governed by the 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." The focus is on informed decision-making and public participation rather than providing a set of alternatives simply to satisfy format.

During the planning process, Metropolitan considered but rejected nine alternatives to the proposed Program. The alternatives that were considered but rejected and the reasoning for why these alternatives were rejected are summarized in Table 35.

Table 35 Alternatives Considered but Rejected

Alternative Number	Alternative	Description of Alternative	Reason Alternative is Considered Infeasible	Reduces Significant and Unavoidable Construction Noise Impact?
1	No Administration and Control Buildings Seismic Upgrade and Building Improvements Project	Under this alternative, seismic upgrades and building improvements to the Administration and Control buildings would not be completed.	Although this alternative would reduce the proposed Program's impacts to historical resources and noise, upgrading and improving the Administration and Control Buildings is necessary to ensure staff safety in accordance with current seismic design practices and code requirements and to maintain operational functionality of the Weymouth Plant following a seismic event.	Partially – reduces daytime construction noise levels at some sensitive receivers
2	No Basin Nos. 1 and 2 Rehabilitation Project	Under this alternative, rehabilitation of Basin Nos. 1 and 2 would not be completed.	Although this alternative would reduce the proposed Program's impacts to historical resources and noise, rehabilitation of Basin Nos. 1 and 2 is necessary to ensure operational functionality of this critical infrastructure and minimize the risk of future system failures.	Partially – reduces daytime construction noise levels at some sensitive receivers

Alternative Number	Alternative	Description of Alternative	Reason Alternative is Considered Infeasible	Reduces Significant and Unavoidable Construction Noise Impact?
3	No New Field Engineering Building Project	Under this alternative, a new Field Engineering Building would not be constructed, and the existing Field Engineering Building would continue to be used for the same purpose as under existing conditions.	Construction of a new Field Engineering Building is necessary to ensure staff safety because the existing Field Engineering Building is vulnerable to damage from seismic events.	No – construction noise associated with New Field Engineering Building project does not contribute to the significant and unavoidable construction noise impact due to its distance from sensitive receptors
4	No Water Treatment Chemical Delivery Railroad Tracks Replacement Project	Under this alternative, the existing water treatment chemical delivery railroad tracks would not be replaced, and the existing tracks would continue to function in its current condition.	Replacement of the water treatment chemical delivery railroad tracks is necessary to ensure continued worker and public safety through compliance with BNSF safety and reliability standards and reliable operation of this critical supporting infrastructure for the Weymouth Plant.	Partially – reduces daytime construction noise levels at some receivers and eliminates nighttime construction noise impact
5	No Water Quality Laboratory Building Improvements Project	Under this alternative, an improved and expanded Water Quality Laboratory building would not be constructed, and the existing Water Quality Laboratory building would continue to be used for the same purpose as under existing conditions.	Construction of an improved and expanded Water Quality Laboratory building is necessary to ensure staff safety and to provide Metropolitan with adequate space to achieve compliance with increasingly stringent regulatory requirements.	Partially – reduces daytime construction noise levels at some receivers
6	No New La Verne Warehouse Facilities Project	Under this alternative, new La Verne Warehouse Facilities would not be constructed, and the existing La Verne Warehouse Facilities would continue to be used for the same purpose as under existing conditions.	Construction of new La Verne Warehouse Facilities is necessary to ensure Metropolitan staff safety during seismic events and to maintain reliable operation of a facility that provides critical support to Metropolitan's operation.	Partially – reduces daytime construction noise levels at some receivers

Alternative Number	Alternative	Description of Alternative	Reason Alternative is Considered Infeasible	Reduces Significant and Unavoidable Construction Noise Impact?
7	Relocation of New La Verne Warehouse Facilities	Under this alternative, the New La Verne Warehouse Facilities would be constructed at an alternative location (outside the Weymouth Plant property).	The La Verne Warehouse Facilities directly support operation of the Weymouth Plant as well as other Metropolitan facilities. Therefore, relocation of the New La Verne Warehouse Facilities to an alternative location would potentially result in additional environmental impacts associated with air quality, GHG emissions, and VMT due to the need to regularly transport materials and equipment from the alternative location to the Weymouth Plant. In addition, this alternative would transfer existing localized air pollutant, noise, and vehicle traffic associated with operation of the warehouse facilities from the Weymouth Plant to another location.	Partially – reduces daytime construction noise levels at some receivers
8	Retrofit of the Existing Field Engineering Building	Under this alternative, the existing Field Engineering Building would be retrofitted, and a new Field Engineering Building would not be constructed.	The existing Field Engineering Building has asbestos, lead, and other contaminants in its building materials, which renders building retrofits not cost effective. In addition, the building footprint of the existing Field Engineering Building would not allow for expansion.	No – construction noise associated with New Field Engineering Building project does not contribute to the significant and unavoidable construction noise impact due to its distance from sensitive receptors
9	Smaller Water Quality Laboratory Building Expansion	Under this alternative, the magnitude of the expansion proposed for the Water Quality Laboratory Building would be smaller (i.e., less than 40,000 square feet).	The proposed 40,000-square-foot expansion is necessary to provide adequate space for Metropolitan's current and future water quality monitoring and research in compliance with regulatory requirements to meet drinking water standards.	No – construction of a smaller expansion of the Water Quality Laboratory Building would require the use of similar construction equipment that would generate noise in excess of the daytime construction noise threshold at the nearest sensitive receptors even with implementation of MM NOI-1

5.4 Alternatives Analysis

5.4.1 Alternative 1: No Program

Pursuant to CEQA Guidelines Section 15126.6(e)(2), the No Program alternative shall:

> discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

Under the No Program alternative, the proposed Program, including its suite of projects, would not be implemented. The proposed improvements, rehabilitation, and upgrades to the Water Quality Laboratory building, Administration and Control buildings, water treatment chemical delivery railroad tracks, and Basin Nos. 1 and 2 would not be implemented, and the proposed New La Verne Warehouse Facilities and New Field Engineering Building would not be constructed. The Weymouth Plant would largely continue to operate in its existing condition, and various infrastructure and buildings would remain exposed to seismic risk, reduced reliability, and reduced safety. Aging and impaired infrastructure would eventually fail, requiring unplanned plant shutdowns and potentially disrupting water supply to Metropolitan's customers. If a major seismic event occurs, significant structural damage to the Administration and Control buildings, existing Field Engineering building, and existing warehouse, could result and compromise the integrity of the Administration and Control buildings, a historical resource, and usage of these facilities. Routine maintenance, operations, and repair activities would continue to occur at the Weymouth Plant, as under existing conditions. The No Program alternative would not meet any of the proposed Program objectives.

5.4.1.1 Impact Analysis

Under the No Program alternative, the impacts identified in Section 3, *Environmental Impact Analysis and Mitigation Measures*, and the NOP/Initial Study (Appendix A) associated with the proposed Program would not occur. The No Program alternative would have fewer environmental impacts than the proposed Program due to the lack of construction activities, new buildings, and additional Metropolitan employees.

Aesthetics

Under the No Program alternative, no construction would occur at the Weymouth Plant, and scenic vistas of the Weymouth Plant (in particular, the Administration and Control buildings) from the Gladstone Street scenic view corridor would not be temporarily altered because no construction activities would occur. The Weymouth Plant's existing visual character would remain the same as existing conditions and, like the proposed Program, would not conflict with zoning or other regulations governing scenic quality. In addition, no new temporary or permanent lighting or glare sources would be introduced to the Weymouth Plant because no construction would occur and the new employee access gate on Sedalia Avenue would not be constructed. Therefore, the No Program alternative would result in no impacts to aesthetics, which is a lesser level of impact than the proposed Program.

Agriculture and Forestry Resources

Similar to the proposed Program, the No Program alternative would result in no impacts to agriculture and forestry resources because no Prime Farmland, Unique Farmland, Farmland of Statewide Importance, forestland, or timberland are present or near the Weymouth Plant (Appendix A).

Air Quality

The No Program alternative would not result in any construction or operational activities beyond existing conditions that could result in impacts to air quality. The No Program alternative would be consistent with the underlying growth assumptions of SCAQMD's AQMP because it would not induce additional growth. The No Program alternative would not generate air pollutant emissions for which the SCAB is in nonattainment or which could adversely affect sensitive receptors. Therefore, the No Program alternative would result in no impacts to air quality, which is a lesser level of impact than the proposed Program. Implementation of MM AQ-1 (detailed in Section 3.1.5.3 [Mitigation Measure]) would not be required.

Biological Resources

The No Program alternative would not involve any construction or operational activities beyond existing conditions at the Weymouth Plant that could result in impacts to biological resources. No special status species would be affected, and the Program site does not contain riparian habitat or other sensitive natural communities (Appendix A). The No Program alternative also would not have a substantial adverse effect to state or federally protected wetlands, interfere substantially with the movement of 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 because none are present within the Program site and would not conflict with local policies or ordinances protecting biological resources because no protected trees would be impacted. In addition, the Program site is not covered by a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan (Appendix A). Therefore, the No Program alternative would result in no impacts to biological resources, which is a lesser level of impact than the proposed Program.

Cultural Resources

The No Program alternative would not result in alterations to character-defining features of the Administration and Control buildings and Basin Nos. 1 and 2, which are contributors to the NRHP and CRHR-eligible Weymouth Water Treatment Plant Historic District, as detailed in Section 3.2, *Cultural Resources*. The No Program alternative also would not involve any ground disturbing activities that could result in the potential disturbance of archaeological resources or human remains. As a result, the No Program alternative would result in no impacts to cultural resources, which is a lesser level of impact than the proposed Program. Implementation of MM CUL-1(a) and MM CUL-1(b) (detailed in Section 3.2.5.3 [Mitigation Measures]) would not be required.

Energy

The No Program alternative would not result in any construction or operational activities beyond existing conditions that could result in impacts to energy. However, the No Program alternative would not result in the upgrades or improvements related to energy efficiency and energy conservation that are included in the Water Quality Laboratory Building Improvements, Administration and Control Buildings Seismic Upgrades and Building Improvements, New La Verne Warehouse Facilities, and Basin Nos. 1 and 2 Rehabilitation projects. Nevertheless, the No Program

alternative would result in no impacts to energy resources as compared to existing conditions, which would be the same level of impact as the proposed Program.

Geology and Soils

The No Program alternative would not result in any construction or operational activities beyond existing conditions that could result in impacts related to erosion, loss of topsoil, unstable geologic units, expansive soils, or paleontological resources. In addition, the Program site would remain at low risk of adverse effects from fault rupture, liquefaction, and landslides. However, the No Program alternative would not include the completion of critical seismic upgrades to the Water Quality Laboratory building, Administration and Control buildings, Basin Nos. 1 and 2, the La Verne Warehouse Facilities, and the Field Engineering building. As such, these buildings would be exposed to greater risk of impacts related to loss, injury, or death should strong seismic groundshaking occur. As a result, the No Program alternative would result in a greater impact to geology and soils than those that would occur under the proposed Program. However, impacts related to geology and soils under the No Program alternative would still be less than significant.

Greenhouse Gas Emissions

The No Program alternative would not result in any construction or operational activities beyond existing conditions that could result in impacts related to GHG emissions. No GHG emissions would be generated, either directly or indirectly, that may have a significant impact on the environment, and the No Program alternative would not conflict with Metropolitan's CAP. Therefore, the No Project Alternative would result in no impacts to GHG emissions, which is a lesser level of impact than the proposed Program.

Hazards and Hazardous Materials

The No Program alternative would not result in any construction activities that could result in impacts related to hazards and hazardous materials. In addition, similar to the proposed Program, the No Program alternative would not result in changes to existing operations at the Weymouth Plant such that impacts related to airport hazards, emergency response and evacuation plans, and wildland fires would result. However, the existing water treatment chemical delivery railroad tracks would not be improved to meet current reliability and safety standards. Therefore, the No Program alternative would have greater potential to create a hazard to the public or the environment through routine transport and use of hazardous materials, including within 0.25 mile of a school, and would also have greater potential to result in the release of hazardous materials into the environment through reasonably foreseeable upset and accident conditions. As a result, because no repairs to the existing water treatment chemical delivery railroad tracks would occur, the No Program alternative would potentially result in greater impacts associated with hazards and hazardous materials than those that would occur under the proposed Program. However, impacts related to hazards and hazardous materials under the No Program alternative would still be less than significant.

Hydrology and Water Quality

The No Program alternative would not result in any construction activities that could result in impacts related to hydrology and water quality. In addition, as with the proposed Program, no groundwater supplies would be utilized, existing stormwater runoff drainage patterns and volumes would remain the same, and the Program site would remain at low risk of releasing pollutants in the event of inundation. However, the existing water treatment chemical delivery railroad tracks would not be improved to meet BNSF's current reliability and safety standards, and the potential for chemicals to be accidentally released to surface waters (e.g., Marshall Canyon Channel) in the event of upset

conditions would be greater than under the proposed Program. As such, the No Program alternative would have greater potential to adversely impact surface water quality of nearby surface water bodies, such as Marshall Creek and Live Oak Wash. Therefore, the No Program alternative would result in greater impacts to hydrology and water quality than would occur under the proposed Program. However, impacts related to hydrology and water quality under the No Program alternative would still be less than significant.

Land Use and Planning

Similar to the proposed Program, the No Program alternative would not physically divide an established community or include any features which would conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating and environmental effect because no changes to the existing Weymouth Plant would occur (Appendix A). Therefore, the No Program alternative would not result in impacts related to land use and planning.

Mineral Resources

Similar to the proposed Program, the No Program alternative would not result in impacts to mineral resources because the Weymouth Plant and its surroundings are not designated, zoned, or used for mineral resource extraction, and the No Program alternative would not result in changes to the current land use of the Program site (Appendix A).

Noise

The No Program alternative would not result in any construction or operational activities beyond existing conditions that could result in impacts related to noise and vibration. As a result, this alternative would not generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Program site in excess of applicable standards, generate excessive groundborne vibration or groundborne noise levels, or expose people residing or working the Program area to excessive noise levels. Therefore, the No Program alternative would result in no noise and vibration impacts, which is a lesser level of impact than the proposed Program, and would eliminate the significant and unavoidable construction noise impact associated with the proposed Program. Implementation of MM NOI-1 (detailed in Section 3.4.5.3 [Mitigation Measure]) would not be required for this alternative.

Population and Housing

Similar to the proposed Program, the No Program alternative would not induce substantial unplanned population growth, either directly or indirectly, or displace substantial numbers of existing people or housing that would necessitate the construction of replacement housing elsewhere because no changes to existing Weymouth Plant operations would occur. Therefore, as with the proposed Program, no impacts to population and housing would occur.

Public Services

The No Program alternative would not result in additional Metropolitan employees and thus would result in no change in the demand for public services associated with the Weymouth Plant. As a result, this alternative would not result in substantial adverse physical environmental impacts associated with the provision of new or physically altered governmental facilities, such as fire protection, police protection, schools, and libraries, to maintain acceptable services ratios, responsive times, or other performance objectives. Therefore, the No Program alternative would result in no impacts to public services, which is a lesser level of impact than the proposed Program.

Recreation

The No Program alternative would not directly or indirectly induce population growth that would increase the use of existing neighborhood and regional parks or other recreational facilities. Similar to the proposed Program, the No Program alternative would not result in impacts related to recreation because the use of existing recreational facilities in the vicinity would not be increased and no recreational facilities would be constructed or expanded (Appendix A).

Transportation

The No Program alternative would not result in any construction or operational activities beyond existing conditions that could result in impacts related to transportation. The No Program alternative would not increase VMT or result in other activities that could conflict with programs, plans ordinances, or policies addressing the circulation system or conflict with CEQA Guidelines Section 15064.3(b). The No Program alternative also would not substantially increase hazards due to a geometric design feature or incompatible uses or result in inadequate emergency access because no changes to the existing Weymouth Plant would occur. Therefore, the No Program alternative would result in no impacts to transportation which is a lesser level of impact than the proposed Program. Implementation of MM TRA-1 (detailed in Section 3.5.5.3 [Mitigation Measure]) would not be required.

Tribal Cultural Resources

Because no archaeological resources were identified within the Program site during the Phase 1 Cultural Resources Assessment and no TCRs were identified within the Program site during the tribal consultation process, the potential to encounter TCRs at the Program site is low. (see Section 3.6, *Tribal Cultural Resources*). In addition, the No Program alternative would not involve any construction activities, changes to Weymouth Plant operations, or ground disturbance that could result in the potential disturbance of tribal cultural resources. Therefore, the No Program alternative would result in no impacts to tribal cultural resources, similar to the proposed Program.

Utilities and Service Systems

Under the No Program alternative, no construction or operational activities would occur that would increase demand for utilities and service systems beyond existing conditions. The No Program alternative would not require the relocation or construction of additional utility infrastructure or increase water demand, wastewater generation, or solid waste generation. Therefore, the No Program alternative would result in no impacts to utilities and service systems, which is a lesser level of impact than the proposed Program (Appendix A).

Wildfire

The Program site is not located within a State Responsibility Area or a Very High Fire Hazard Severity Zone. Similar to the proposed Program, the No Program alternative would result in no impacts related to wildfire because no construction activities or changes to existing Weymouth Plant operations would occur that could impair adopted emergency response and evacuation plans, exacerbate wildfire risks, require the installation or maintenance of wildfire prevention infrastructure that may result in temporary or ongoing impacts to the environment, or expose people or structures to significant post-fire risks (Appendix A).

5.4.2 Alternative 2: Modified Construction Parameters

Under the Modified Construction Parameters alternative, the overall proposed construction schedule would be extended to avoid or minimize overlapping construction activities and nighttime construction would be avoided for the Water Treatment Chemical Delivery Railroad Tracks Replacement project. However, the individual construction phase lengths of each project would remain the same. Operational characteristics under the Modified Construction Parameters alternative would be the same as operation of the proposed Program. The Modified Construction Parameters alternative would meet all proposed Program objectives and project-specific objectives.

5.4.2.1 Impact Analysis

Overall, the Modified Construction Parameters alternative would not avoid the proposed Program's significant and unavoidable impact related to construction noise. However, the magnitude of daily construction noise and air quality impacts would be reduced because no nighttime construction would occur and fewer daily air pollutant emissions would be generated. The extended construction schedule would require the use of construction equipment for a longer duration of time, resulting in greater overall GHG emissions. Also, by avoiding nighttime construction activities, intersection closures along Wheeler Avenue would be limited to daytime hours when transportation impacts would be greater.

Aesthetics

The Modified Construction Parameters alternative would include the same projects as the proposed Program and would be developed on the same project footprint. Therefore, the Modified Construction Parameters alternative would have the same impacts related to scenic vistas, views from a state scenic highway, and regulations governing scenic quality as the proposed Program. Unlike the proposed Program, the Modified Construction Parameters alternative would not introduce new temporary sources of nighttime light and glare during construction activities because the Water Treatment Chemical Delivery Railroad Tracks Replacement project would be constructed during daytime hours and would not require nighttime construction activities. As a result, the Modified Construction Parameters alternative would also result in less-than-significant impacts to aesthetics than would occur under the proposed Program, but to a lesser degree because no nighttime construction activities would occur. (Appendix A).

Agriculture and Forestry Resources

Similar to the proposed Program, the Modified Construction Parameters alternative would result in no impact to agriculture and forestry resources because no Prime Farmland, Unique Farmland, Farmland of Statewide Importance, forestland, or timberland are present or near the Weymouth Plant (Appendix A).

Air Quality

The Modified Construction Parameters alternative would result in fewer daily criteria air pollutant and TAC emissions because fewer projects included in the Program would be constructed concurrently due to the extended timeframe. As a result, implementation of MM AQ-1 (detailed in Section 3.1.5.3 [Mitigation Measure]) may not be required for this alternative depending on the specific timing of the architectural coating phases during construction of individual projects and whether multiple projects are undergoing architectural coating simultaneously. However, this alternative would expose sensitive receptors to criteria air pollutant and TAC emissions for a longer

duration as compared to proposed Program activities. Because daily air pollutant emissions would be reduced, the Modified Construction Parameters alternative would result in lesser impacts to air quality than would occur in accordance with the proposed Program, which may be less-than-significant or less-than-significant with mitigation incorporated.

Biological Resources

The Modified Construction Parameters alternative would require similar construction activities within the same footprint as the proposed Program and would have the same operational characteristics as the proposed Program. No additional special status species, sensitive vegetation communities, wetlands, or other regulated biological resources would be impacted under this alternative. Therefore, the Modified Construction Parameters alternative would result in less-than-significant impacts to biological resources, as would occur under the proposed Program (Appendix A).

Cultural Resources

The Modified Construction Parameters alternative would require similar construction activities within the same footprint as the proposed Program and would have the same operational characteristics as the proposed Program. This alternative would include alterations to the character-defining features of the Administration and Control buildings and Basin Nos. 1 and 2, which are contributors to the NRHP and CRHR-eligible Weymouth Water Treatment Plant Historic District, as detailed in Section 3.2, *Cultural Resources*. Implementation of MM CUL-1(a) and MM CUL-1(b) (detailed in Section 3.2.5.3 [Mitigation Measures]) would also be required for the Modified Construction Parameters alternative to reduce significant impacts to historical resources. Therefore, the Modified Construction Parameters alternative would result in less-than-significant impacts to cultural resources with mitigation incorporated, as would occur under the proposed Program.

Energy

The Modified Construction Parameters alternative would require similar construction activities and would have the same operational characteristics as the proposed Program. However, due to the extended construction timeframe, additional consumption of energy resources would occur, primarily due to the additional construction worker vehicle trips to and from the Program site as a result of a greater number of work days. Similar to the proposed Program, construction of the Modified Construction Parameters alternative would occur in accordance with applicable CARB and USEPA standards. Also, Metropolitan and its contractors, for the purposes of environmental awareness and cost-efficiency, would not use energy wastefully, inefficiently, or unnecessarily. The Modified Construction Parameters alternative would also similarly not conflict with or obstruct the energy-related policies of Metropolitan's CAP. Therefore, the Modified Construction Parameters alternative would result in no impacts to energy, as would occur under the proposed Program (Appendix A).

Geology and Soils

The Modified Construction Parameters alternative would result in construction of the same projects in the same project footprint as would occur under the proposed Program in accordance with the California Building Code and La Verne Municipal Code requirements. As a result, similar impacts related to seismic hazards, soil erosion and loss of topsoil, unstable geologic units and soils, expansive soils, septic tanks and alternative wastewater disposal systems, and paleontological resources would occur under this alternative. Therefore, the Modified Construction Parameters alternative would also result in less-than-significant impacts to geology and soils, as would occur in accordance with the proposed Program (Appendix A).

Greenhouse Gas Emissions

The Modified Construction Parameters alternative would result in a longer construction period, which would increase the total amount of GHGs emitted during construction, primarily due to the additional construction worker vehicle trips to and from the Program site due to the greater number of work days. This alternative would have the same operational characteristics as the proposed Program and would be similarly consistent with Metropolitan's CAP. Applicable CAP measures would be incorporated. As such, the Modified Construction Parameters alternative would result in less-than-significant impacts related to GHG emissions, as would occur under the proposed Program, even with the increase in GHG emissions during construction.

Hazards and Hazardous Materials

The Modified Construction Parameters alternative would require similar construction activities and would have the same operational characteristics as the proposed Program. As a result, similar impacts related to the routine transport, use, or disposal of hazardous materials; the creation of a significant hazard through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; the emission of hazardous materials or substances near schools; hazardous waste sites; airport hazards; emergency response and evacuation plans; and wildland fires would occur under this alternative. Therefore, the Modified Construction Parameters alternative would result in less-than-significant impacts to hazards and hazardous materials, as would occur under the proposed Program (Appendix A).

Hydrology and Water Quality

The Modified Construction Parameters alternative would require similar construction activities and would have the same operational characteristics as the proposed Program. As a result, similar impacts related to surface and groundwater quality, groundwater supplies and recharge, existing drainage patterns, and the release of pollutants due to flooding would occur under this alternative. Therefore, Modified Construction Parameters alternative would result in less-than-significant impacts to hydrology and water quality, as would occur under the proposed Program (Appendix A).

Land Use and Planning

Similar to the proposed Program, the Modified Construction Parameters alternative would not physically divide an established community or conflict with the existing land uses of the Weymouth Plant such that environmental impacts would occur. Therefore, the Modified Construction Parameters alternative would result in no impacts to land use and planning, as would occur under the proposed Program (Appendix A).

Mineral Resources

Similar to the proposed Program, the Modified Construction Parameters alternative would not result in impacts to mineral resources because the Weymouth Plant and its surroundings are not designated, zoned, or used for mineral resource extraction, and this alternative would not result in changes to the current land use of the Program site (Appendix A).

Noise

The Modified Construction Parameters alternative would avoid the nighttime construction noise impacts that would occur under the proposed Program because no nighttime construction activities would occur. Daytime construction noise levels for individual projects would be similar to those of the proposed Program and would also exceed the City's daytime noise standards. As a result,

implementation of MM NOI-1 (detailed in Section 3.4.5.3 [Mitigation Measure]) would be required for the Modified Construction Parameters alternative to reduce construction noise impacts to the extent feasible. In addition, the Modified Construction Parameters alternative would expose sensitive receivers to daytime construction noise for a longer duration as compared to proposed Program activities due to the extended construction schedule. On-site operational and off-site roadways noise levels as well as construction and operational vibration levels generated by the Modified Construction Parameters would be similar to the proposed Program. Because nighttime construction noise would be avoided, the Modified Construction Parameters alternative would result in lesser impacts to noise than would occur under the proposed Program; however, impacts would remain significant and unavoidable because MM NOI-1 would not reduce daytime construction noise below the City's daytime noise standards.

Population and Housing

Similar to the proposed Program, the Modified Construction Parameters alternative would result in up to 10 additional Metropolitan employees at the Weymouth Plant, which would not result in substantial unplanned population growth. In addition, this alternative would not include the construction of new water supply facilities or the expansion of treatment capacity that could indirectly induce population growth and would not displace existing people or housing. Therefore, the Modified Construction Parameters alternative would result in no impacts to population and housing, as would occur under the proposed Program (Appendix A).

Public Services

The Modified Construction Parameters alternative would result in up to 10 additional Metropolitan employees at the Weymouth Plant, similar to the proposed Program. This minimal increase in employees would result in a minor increase in demand for fire protection services and would not substantially increase the demand for police protection, schools, parks, or other public services. Therefore, the Modified Construction Parameters alternative would result in less-than-significant impacts to public services, as would occur under the proposed Program (Appendix A).

Recreation

Similar to the proposed Program, the Modified Construction Parameters alternative would generate up to 10 additional Metropolitan employees. This minimal increase in employees would not increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of recreation facilities occur or be accelerated. Similar to the proposed Program, this alternative does not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, the Modified Construction Parameters alternative would result in no impacts to recreation, as would occur under the proposed Program (Appendix A).

Transportation

The Modified Construction Parameters alternative would require similar construction activities within the same footprint and would have the same operational characteristics as the proposed Program. The Modified Construction Parameters alternative would result in a similar amount of construction-related VMT because the Modified Construction Parameters alternative would not increase the lengths of individual project schedules. However, under this alternative, no nighttime construction activities for the Water Treatment Chemical Delivery Railroad Tracks Replacement project would be permitted, which would result in all intersection closures occurring during daytime hours and for a longer duration. As such, the Modified Construction Parameters alternative would result in slightly greater impacts to the local transportation network during construction as compared to the proposed Program.

Implementation of MM TRA-1 (detailed in Section 3.5.5.3 [Mitigation Measure]) would also be required for this alternative. Therefore, the Modified Construction Parameters alternative would result in less-than-significant impacts to transportation, as would occur under the proposed Program despite the increased impact to the transportation network due to longer daytime intersection closures.

Tribal Cultural Resources

Because no archaeological resources were identified within the Program site during the Phase 1 Cultural Resources Assessment and no TCRs were identified within the Program site during the tribal consultation process, the potential to encounter TCRs at the Program site is low. (see Section 3.6, *Tribal Cultural Resources*). The Modified Construction Parameters alternative would result in the same ground-disturbing activities and footprint as would occur in accordance with the proposed Program. Accordingly, the Modified Construction Parameters alternative would result in no impacts to tribal cultural resources, which is the same as would occur under the proposed Program.

Utilities and Service Systems

The Modified Construction Parameters alternative would require similar construction activities within the same footprint and would have the same operational characteristics as the proposed Program. Therefore, the Modified Construction Parameters alternative would result in less-than-significant impacts to utilities and service systems, as would occur under the proposed Program (Appendix A).

Wildfire

The Program site is not located within a State Responsibility Area or a Very High Fire Hazard Severity Zone. The Modified Construction Parameters alternative would require similar construction activities within the same footprint and would have the same operational characteristics as the proposed Program. As such, this alternative would not substantially impair an adopted emergency response or an emergency evacuation plan, or exacerbate any wildfire risks due to slope, prevailing winds, and other related wildfire factors. As a result, similar to the proposed Program, the Modified Construction Parameters alternative would result in no impacts related to wildfire (Appendix A).

5.4.3 Summary of Alternatives Analysis

Table 36 compares the environmental impacts of the identified alternatives to the proposed Program.

Table 36 Summary Comparison of Alternative Impacts

Environmental Resource Area	Proposed Program	No Program	Modified Construction Parameters
Aesthetics	Less Than Significant/ No Impact	No Impact	Less than Significant
Agriculture and Forestry Resources	No Impact	No Impact	No Impact
Air Quality	AQ-A: Less Than Significant with Mitigation Incorporated AQ-B: Less Than Significant with Mitigation Incorporated AQ-C: Less Than Significant	No Impact	AQ-A: Less Than Significant with Mitigation Incorporated AQ-B: Less Than Significant with Mitigation Incorporated AQ-C: Less Than Significant
Biological Resources	Less Than Significant/ No Impact	No Impact	Less Than Significant/ No Impact

Environmental Resource Area	Proposed Program	No Program	Modified Construction Parameters
Cultural Resources	CUL-A: Less Than Significant with Mitigation Incorporated CUL-B: Less Than Significant	No Impact	CUL-A: Less Than Significant with Mitigation Incorporated CUL-B: Less Than Significant
Energy	No Impact	No Impact	No Impact
Geology and Soils	Less Than Significant/ No Impact	Less Than Significant/No Impact	Less Than Significant/No Impact
Greenhouse Gas Emissions	GHG-A: Less Than Significant GHG-B: No Impact	No Impact	GHG-A: Less Than Significant GHG-B: No Impact
Hazards and Hazardous Materials	Less Than Significant/ No Impact	Less than Significant/No Impact	Less Than Significant/ No Impact
Hydrology and Water Quality	Less Than Significant/ No Impact	Less than Significant/No Impact	Less Than Significant/ No Impact
Land Use and Planning	No Impact	No Impact	No Impact
Mineral Resources	No Impact	No Impact	No Impact
Noise	NOI-A: Significant and Unavoidable NOI-B: Less Than Significant	No Impact	NOI-A: Significant and Unavoidable NOI-B: Less Than Significant
Population and Housing	No Impact	No Impact	No Impact
Public Services	Less Than Significant/ No Impact	No Impact	Less Than Significant/ No Impact
Recreation	No Impact	No Impact	No Impact
Transportation	TRA-A: Less Than Significant with Mitigation Incorporated TRA-B: Less Than Significant TRA-C: Less Than Significant with Mitigation Incorporated	No Impact	TRA-A: Less Than Significant with Mitigation Incorporated TRA-B: Less Than Significant TRA-C: Less Than Significant with Mitigation Incorporated
Tribal Cultural Resources	TCR-A: No Impact	No Impact	TCR-A: No Impact
Utilities and Service Systems	Less Than Significant/ No Impact	No Impact	Less Than Significant
Wildfire	No Impact	No Impact	No Impact

5.5 Environmentally Superior Alternative

If an alternative is considered clearly superior to a proposed project relative to identified impacts, CEQA Guidelines Section 15126.6 requires that alternative be identified as the environmentally superior alternative. By statute, if the environmentally superior alternative is the No Project Alternative, an EIR must also identify an environmentally superior alternative among the other alternatives.

Table 36 compares the impacts of the identified alternatives to the proposed Program. Based on the analysis provided in Section 5.4, *Alternatives Analysis*, the No Program alternative would have

"similar," "similar but reduced," or "reduced" environmental impacts compared to the proposed Program with regard to: aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, energy, GHG emissions, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire. The No Program alternative would result in reduced impacts because no construction activities or changes to the existing operational characteristics of the Weymouth Plant would occur, and the proposed Program's significant and unavoidable impact related to construction noise would not occur. Although this alternative would result in greater impacts than the proposed Program related to seismic groundshaking, hazardous materials, and surface water quality due to lack of upgrades to aging infrastructure, the No Program alternative would overall result in fewer environmental impacts than the proposed Program.

The Modified Construction Parameters alternative would have "similar," "similar but reduced," or "reduced" environmental impacts as the proposed Program with regard to: aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, energy, geology and soils, hazards and hazardous materials, land use and planning, mineral resources, noise, population and housing, public services, recreation, tribal cultural resources, utilities and service systems, and wildfire. However, this alternative would not avoid the proposed Program's significant and unavoidable impact related to construction noise and would result in incrementally greater impacts related to GHG emissions and transportation due to the extended construction schedule.

Therefore, among the proposed Program and the two alternatives evaluated, the No Program alternative would be the environmentally superior alternative because it would avoid the proposed Program's significant and unavoidable impact related to construction noise and would result in generally similar or reduced impacts to other environmental resources. However, the No Program alternative would not meet any of the Program or project-specific objectives. In addition, if the No Program alternative is the environmentally superior alternative, CEQA requires identification of an environmentally superior alternative among the remaining alternatives (CEQA Guidelines Section 15126.6[e]). As a result, between the proposed Program and the Modified Construction Parameters alternative, the Modified Construction Parameters alternative would be considered the environmentally superior alternative because it would result in similar or fewer impacts to most environmental resources as compared to the proposed Program and would reduce the severity of the significant and unavoidable construction noise impact, although not to a level of less-than-significant.

6 References and Preparers

6.1 References

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6.2 Preparers

6.2.1 The Metropolitan Water District of Southern California

Brenda Marines, Environmental Specialist
Jolene Ditmar, Associate Environmental Specialist

6.2.2 Rincon Consultants, Inc.

Jennifer Haddow, PhD, Principal Environmental Scientist
Annaliese Torres, Senior Environmental Planner
Ethan Knox, Environmental Planner
Virginia Dussell, Environmental Planner
Rachel Perzel, Senior Architectural Historian
Mary Pfeiffer, Archaeologist
Josh Patterson, GIS Analyst
Allysen Valencia, GIS Analyst
Luis Apolinar, Publishing Specialist
Yaritza Ramirez, Publishing Specialist
Zong Moua, Digital Accessibility Manager

7 Acronyms and Abbreviations

ADA	Americans with Disabilities Act
ADT	Average Daily Traffic
AQMP	Air Quality Management Plan
BMPs	best management practices
BNSF	Burlington Northern Santa Fe Railway Company
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CBC	California Building Code
CEQA	California Environmental Quality Act
CHRIS	California Historical Resources Information System
City	City of La Verne
CO_2	Carbon Dioxide
CO_2e	Carbon Dioxide Equivalent
CPUC	California Public Utilities Commission
CRA	Colorado River Aqueduct
CRHR	California Register of Historical Resources
CRTP	Cultural Resource Treatment Plan for the Weymouth Water Treatment Plant Historic District
cy	cubic yards
dB	decibels
dBA	A-weighted decibels
DDW	State Water Resources Control Board Division of Drinking Water
DOF	California Department of Finance
DPM	diesel particulate matter
EIR	Environmental Impact Report

EO	Executive Order
°F	degrees Fahrenheit
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GWP	global warming potential
HAPs	hazardous air pollutants
hr	hour
HVAC	heating, ventilation, and air conditioning
Hz	Hertz
I-10	Interstate 10
in/sec	inches per second
IPCC	Intergovernmental Panel on Climate Change
LED	Light Emitting Diode
LEED	Leadership in Energy Efficiency and Design
L_{eq}	Equivalent Noise Level
LOS	Level of Service
LST	Localized Significance Threshold
MACT	Maximum Achievable Control Technology
MATES	Multiple Air Toxics Exposure Study
Metropolitan	The Metropolitan Water District of Southern California
MGD	million gallons per day
MLD	Most Likely Descendant
MMRP	Mitigation Monitoring and Reporting Program
MMT	million metric tons
MT	metric tons
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NESHAPs	National Emission Standards for Hazardous Air Pollutants
NO_x	nitrogen oxides
NOP	Notice of Preparation
NRHP	National Register of Historic Places
OPR	California Governor's Office of Planning and Research
PCB	polychlorinated biphenyls
PEIR	Program Environmental Impact Report
PM	particulate matter

PM_{10}	particulate matter 10 microns or less in diameter
$PM_{2.5}$	particulate matter 2.5 microns or less in diameter
ppb	parts per billion
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
RMS	root mean squared
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCH	State Clearinghouse
SLF	Sacred Lands File
SO_2	sulfur dioxide
SR	State Route
SRA	Source Receptor Area
SWP	State Water Project
SWPPP	Stormwater Pollution Prevention Plan
TACs	toxic air contaminants
TAZ	Transportation Analysis Zone
TCR	Tribal Cultural Resources
TMP	traffic management plan
TWSC	two way stop control
USEPA	United States Environmental Protection Agency
VdB	vibration decibels
VMT	vehicle miles traveled
VOCs	volatile organic compounds
WPA	Works Progress Administration
WPCP	Water Pollution Control Program
$\mu g/m^3$	micrograms per cubic meter

THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

The Metropolitan Water District of Southern California

700 North Alameda Street
Los Angeles, CA 90012-2944

213-217-6000

mwdh2o.com