DRAFT

INITIAL STUDY/
MITIGATED NEGATIVE DECLARATION

DSH METROPOLITAN WATER TANKS #1 AND #2 REPLACEMENT PROJECT

NORWALK, CALIFORNIA

LSA

June 2025

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DSH METROPOLITAN WATER TANKS #1 AND #2 REPLACEMENT PROJECT

NORWALK, CALIFORNIA

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June 2025

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TABLE OF CONTENTS

TABLE OF CONTENTS i
FIGURES AND TABLES iii
LIST OF ABBREVIATIONS AND ACRONYMS v
1.0 PROJECT INFORMATION 1-1
2.0 PROJECT DESCRIPTION 2-1
2.1 Project Location 2-1
2.2 Project Setting 2-1
2.3 Project Background and Purpose 2-1
2.4 Project Characteristics 2-1
2.5 Construction and Utility Infrastructure 2-7
2.6 Regulatory Requirements, Permits, and Approvals 2-7
3.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED 3-1
3.1 Determination 3-8
4.0 CEQA ENVIRONMENTAL CHECKLIST 4-1
4.1 Aesthetics 4-1
4.2 Agriculture and Forest Resources 4-2
4.3 Air Quality 4-3
4.4 Biological Resources 4-11
4.5 Cultural Resources 4-12
4.6 Energy 4-14
4.7 Geology and Soils 4-17
4.8 Greenhouse Gas Emissions 4-18
4.9 Hazards and Hazardous Materials 4-23
4.10 Hydrology and Water Quality 4-29
4.11 Land Use and Planning 4-30
4.12 Mineral Resources 4-31
4.13 Noise 4-32
4.14 Population and Housing 4-40
4.15 Public Services 4-41
4.16 Recreation 4-42
4.17 Transportation 4-43
4.18 Tribal Cultural Resources 4-46
4.19 Utilities and Service Systems 4-51
4.20 Wildfire 4-52
4.21 Mandatory Findings of Significance 4-53
5.0 LIST OF PREPARERS 5-1
5.1 IS/MND Preparers 5-1
5.2 Technical Report Preparers 5-1
6.0 REFERENCES 6-1

APPENDICES (APPENDICES ARE AVAILABLE UPON REQUEST)

A: CALEEMOD OUTPUT SHEETS
B: HISTORICAL SIGNIFICANCE EVALUATION
C: HAZARDOUS MATERIAL BUILDING SURVEY

FIGURES AND TABLES

FIGURES

Figure 2-1: Regional and Project Location 2-3
Figure 2-2: Project Site 2-5

TABLES

Table 4.A: SCAQMD Construction and Operation Thresholds of Significance (lbs/day) 4-4
Table 4.B: SCAQMD Localized Significance Thresholds 4-5
Table 4.C: Short-Term Regional Construction Emissions 4-8
Table 4.D: Project Localized Construction Emissions (in Pounds per Day) 4-9
Table 4.E: Construction Greenhouse Gas Emissions 4-20
Table 4.F: Construction Vibration Damage Criteria 4-34
Table 4.G: Typical Maximum Construction Equipment Noise Levels (L_{max}) 4-36
Table 4.H: Noise Levels By Construction Phase 4-37
Table 4.I: Vibration Source Amplitudes for Construction Equipment 4-39

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LIST OF ABBREVIATIONS AND ACRONYMS

AAQS	ambient air quality standards
AB	Assembly Bill
ACM	asbestos-containing materials
AIN	Assessor's Identification Number
aqmp	Air Quality Management Plan
Basin	South Coast Air Basin
BMP	best management practice
BTU	British thermal units
CalEEMod	California Emissions Estimator Model version 2022.1
Cal/OSHA	California Occupational Safety and Health Administration
California Register	California Register of Historical Places
CAL FIRE	California Department of Forestry and Fire Protection
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
cgp	Construction General Permit
CH_4	methane
City	City of Norwalk
CNEL	community noise equivalent level

CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
County	County of Los Angeles
County TIA Guidelines	Los Angeles County Public Works Transportation Impact Analysis Guidelines
cy	cubic yards
dB	decibel(s)
dBA	A-weighted sound level
DGS	Department of General Services
DNL	day-night average level
DOSH	California Department of Occupational Safety and Health
DSH	Department of State Hospitals
DTSC	California Department of Toxic Substances Control
EO	Executive Order
FEMA	Federal Emergency Management Agency
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
FTA Manual	FTA Transit Noise and Vibration Impact Assessment Manual
FUL	Fullerton Municipal Airport
GHG	greenhouse gas
GWh	gigawatt hours
GWP	Global Warming Potential
HCP	Habitat Conservation Plan

HFC	hydrofluorocarbons
in/sec	inch(es) per second
IS/MND	Initial Study/Mitigated Negative Declaration
Kizh	Gabrieleño Band of Mission Indians-Kizh Nation
KWh	kilowatt-hours
LBM	lead-based materials
lbs/day	pounds per day
L_{dn}	day-night average level
L_{eq}	equivalent continuous sound level
LOS	level(s) of service
LRA	Local Responsibility Area
LST	localized significance threshold
LUST	Leaking Underground Storage Tank
MBTA	Migratory Bird Treaty Act
MM	Mitigation Measure
MND	Mitigated Negative Declaration
mph	miles per hour
MS4	Municipal Separate Storm Sewer Systems
MT	metric ton(s)
N_2O	nitrous oxide
NAHC	Native American Heritage Commission
National Register	National Register of Historic Places
NCCP	Natural Community Conservation Plan
Non-VHFHSZ	Non-Very High Fire Hazard Severity Zone

NO_2	nitrogen dioxide
NO_X	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
O_3	ozone
OPR	Office of Planning and Research
Pb	lead
PFCs	perfluorocarbons
$PM_{2.5}$	particulate matter less than 2.5 microns in size
PM_{10}	particulate matter less than 10 microns in size
PPV	peak particle velocity
PRC	Public Resources Code
proposed project	DSH Metropolitan Water Tanks #1 and #2 Replacement Project
RCM	Regulatory Compliance Measure
RMS	root-mean-square
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SF_6	sulfur hexafluoride
SO_2	sulfur dioxide
SO_X	sulfur oxides
SR-91	State Route 91
SRA	State Responsibility Area
SWPPP	Stormwater Pollution Prevention Plan

SWRCB	State Water Resources Control Board
TCR	tribal cultural resource
USDOT	United States Department of Transportation
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
VMT	vehicle miles traveled
VOC	volatile organic compounds

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1.0 PROJECT INFORMATION

1. **Project Title:**
   Department of State Hospitals Metropolitan Water Tanks #1 and #2 Replacement Project

2. **Lead Agency Name and Address:**
   Department of State Hospitals
   1215 O Street, 2nd Floor
   Sacramento, California 95814
   Contact: Crystal Zhang, Associate Construction Analyst
   (916) 980-7128

3. **Contact Person and Phone Number:**
   Jennifer Parson, Senior Environmental Planner
   Department of General Services
   (916) 376-1604

4. **Project Location:**
   The proposed project is located within the Department of State Hospitals (DSH) Metropolitan State Hospital campus, located at 11401 Bloomfield Avenue in Norwalk, Los Angeles County, California (refer to Figure 2-1, Regional and Project Location). The project site is located at the northeastern corner of Balsam Street and 9th Street (Assessor's Identification Number [AIN] 8025-003-902).

5. **Project Sponsor's Name and Address:**
   Same as lead agency

6. **General Plan Designation:**
   Institutional

7. **Zoning:**
   Institutional (I)

8. **Description of Project:**
   Please refer to Chapter 2.0, Project Description.

9. **Surrounding Land Uses and Setting:**
   Please refer to Chapter 2.0, Project Description.

10. **Other Public Agencies Whose Approval is Required (e.g., permits, financial approval, or participation agreements):**
    Please refer to Chapter 2.0, Project Description.

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

One California Native American tribe, the Gabrieleño Band of Mission Indians – Kizh Nation, requested consultation pursuant to Public Resources Code (PRC) Section 21080.3.1. Consultation with Native American tribes was conducted by the DSH/Department of General Services (DGS), as described further in Section 4.18, Tribal Cultural Resources.

2.0 PROJECT DESCRIPTION

2.1 PROJECT LOCATION

The DSH Metropolitan Water Tanks #1 and #2 Replacement Project (proposed project) is located within the DSH Metropolitan State Hospital campus at 11401 Bloomfield Avenue in Norwalk, Los Angeles County, California. The approximately 1.3-acre project site consists of one parcel (AIN 8025-003-902). The project site is bounded by Balsam Street to the west, 9th Street to the south, a parking lot and grass field to the east, and undeveloped land and 8th Street to the north. The project site is approximately 0.65 mile northeast of Interstate 5 (I-5) and approximately 0.87 mile northeast of State Route 42 (SR-42). Refer to Figure 2-1, Regional and Project Location.

2.2 PROJECT SETTING

The project site currently consists of two 750,000-gallon water tanks, a fire water pumphouse, an irrigation pumphouse, potable and nonpotable water pumphouses, and associated infrastructure (refer to Figure 2-2, Project Site). The project site is primarily flat at approximately 106 feet above mean sea level.

The project site is enclosed by chain-link fencing and is gated. Primary access to the hospital campus is provided along Bloomfield Avenue to the east of the project site.

Land uses surrounding the hospital campus include commercial to the north, east, and south, and residential to the south and west. The project site is designated as Institutional in the City of Norwalk's (City) General Plan and zoned Institutional (I) per the City's Zoning Code.

2.3 PROJECT BACKGROUND AND PURPOSE

The existing water tanks were constructed in 1955 and circa 1960. Tank #1 currently supplies water to the hospital campus for both domestic use and fire suppression. Tank #2 is not currently in service but was previously used for additional water storage. The existing water tanks are corroded and do not meet current safety standards. Additionally, Tank #1 does not have a vortex, which can lead to collapse if water is extracted by the fire pump and would make it dysfunctional for firefighting efforts. The proposed project would replace the existing outdated water tanks with new tanks that meet current standards, as well as associated piping, valving, and appurtenances.

2.4 PROJECT CHARACTERISTICS

The proposed project would demolish the two existing 22-foot-tall, 750,000-gallon-capacity water tanks and the existing nonpotable water pumphouse, which is located behind Tank #2 (refer to Figure 2-2). The existing water tanks would be replaced by two new 40-foot-tall (maximum height), 80-foot-diameter, 1,000,000-gallon-capacity water tanks. The proposed project would also replace piping, valving, and appurtenances associated with the new water tanks and existing pumphouses, and would verify/complete connections from the existing 12-inch firewater main along Balsam Street and South Circle Drive to the existing sprinkler system supply lines in the hospital campus' central kitchen, administration building, and skilled nursing facility.

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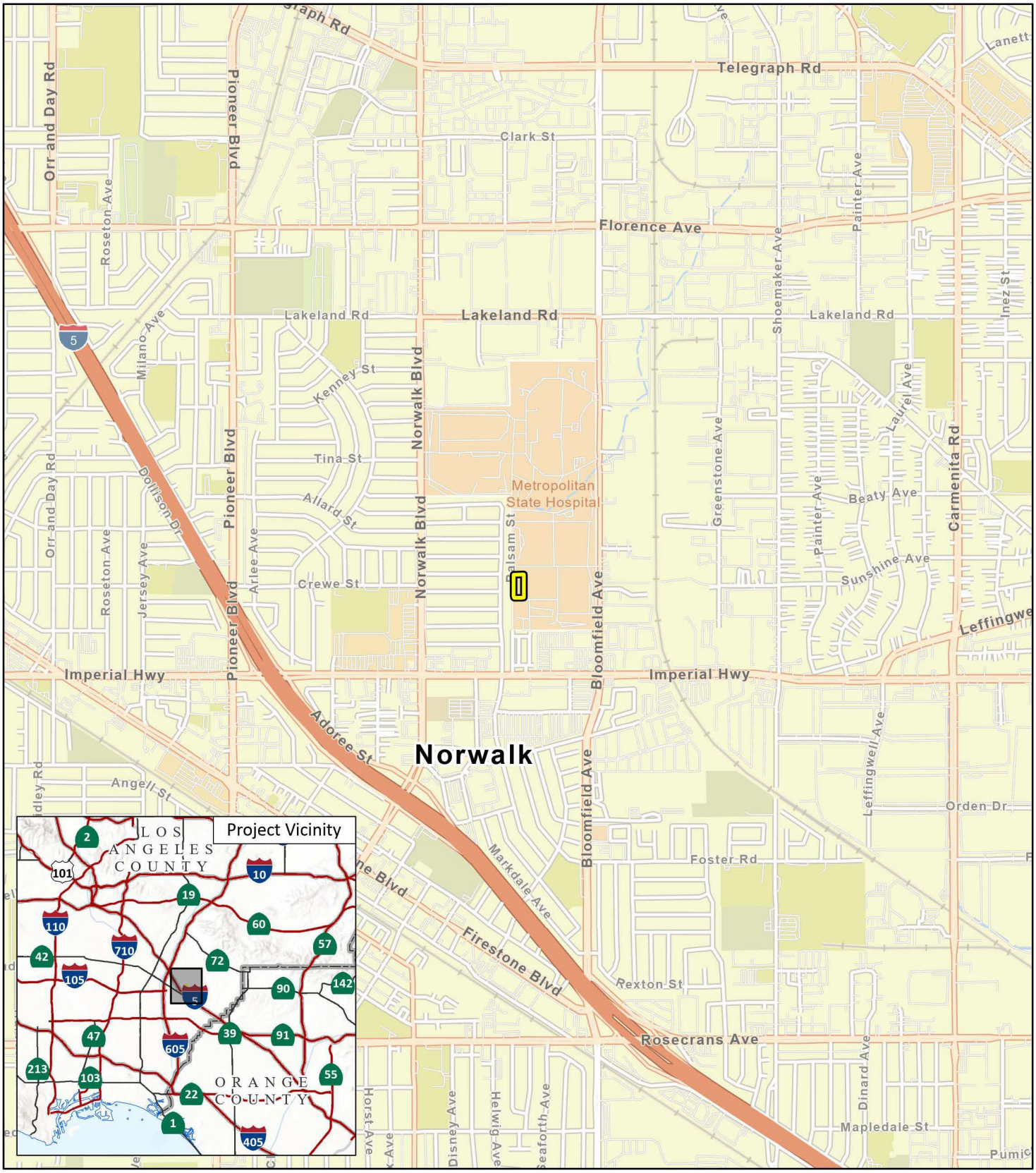

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FIGURE 2-1

N

0 1000 2000
FEET

SOURCE: Esri World Street Map (2018)

DSH Metropolitan Water Tanks Replacement Project

Regional and Project Location

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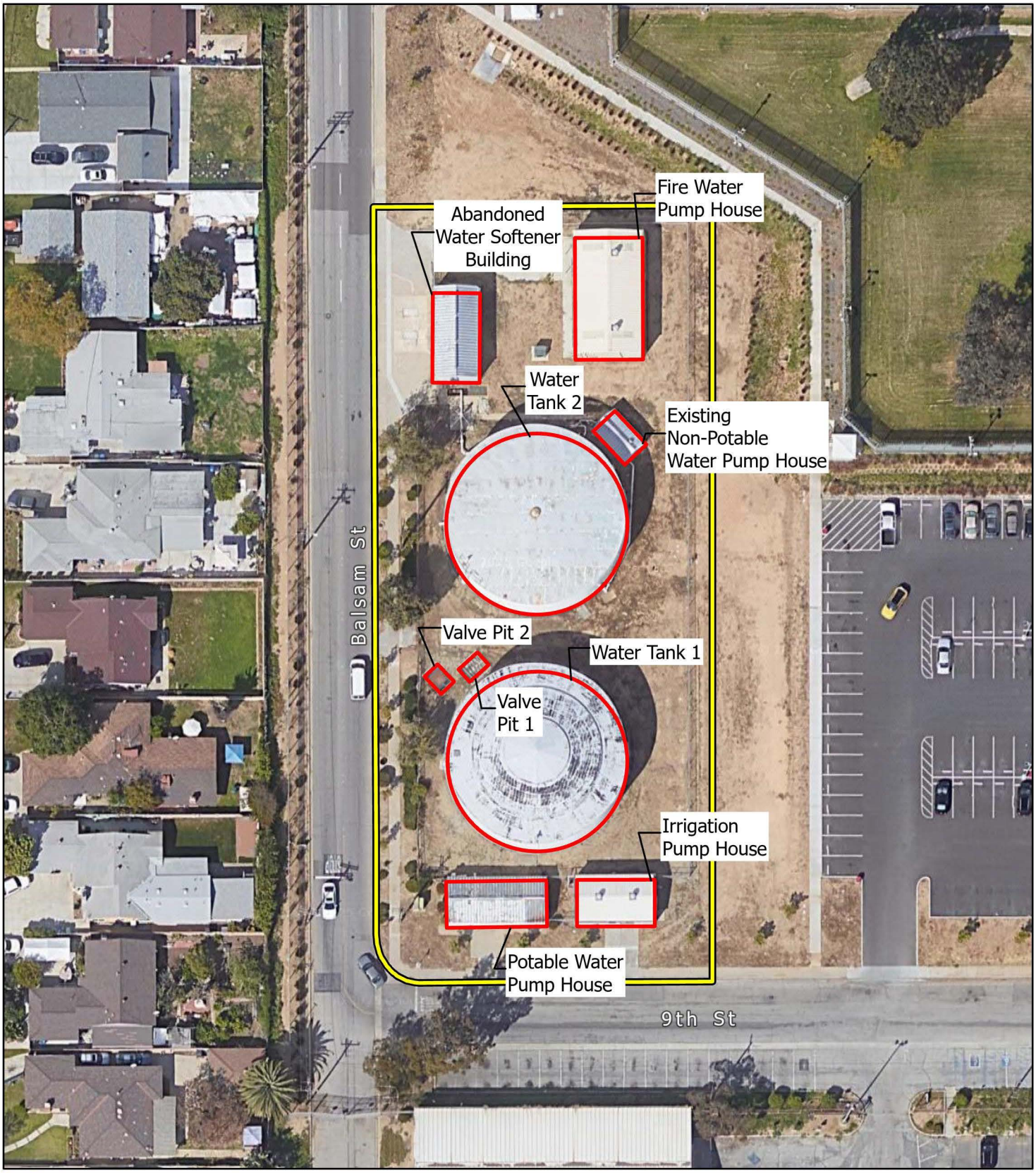

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Project Site

Existing Features

FIGURE 2-2

N

0 30 60

FEET

SOURCE: Google Maps (2024)

DSH Metropolitan Water Tanks Replacement Project

Project Site

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The new Tank #1 would serve as the primary domestic water storage tank for the hospital campus. The new Tank #2 would serve as a fire water storage tank and would be connected to the existing fire pumps on site to supply the campus with water for firefighting needs.

2.5 CONSTRUCTION AND UTILITY INFRASTRUCTURE

Construction of the proposed project would occur in two phases. Phase 1 would include the demolition and replacement of Tank #1. During Phase 1 of construction, the existing Tank #2 would be temporarily brought back into service to provide the campus with water storage until the new Tank #1 is installed and operational. Phase 2 would include the demolition and replacement of Tank #2, demolition of the existing nonpotable water pumphouse directly behind Tank #2, and verification/completion of the connections from the 12-inch fire main to the campus' existing sprinkler system supply lines at the central kitchen, administration building, and skilled nursing facility. During Phase 2 of construction, the new Tank #1 would serve as the primary water storage tank for the campus. Construction is expected to take approximately 12 months for each phase; Phase 1 is anticipated to begin in late 2025 and Phase 2 is anticipated to begin at the end of 2026.

Based on the preliminary grading plans, the proposed project would require the net export of approximately 90 cubic yards of soil/material. Construction would involve the use of standard earthmoving equipment such as large excavators, a skid steer, a telehandler, and other related equipment. Construction of the proposed project would require a maximum excavation depth of 2.5 feet.

2.6 REGULATORY REQUIREMENTS, PERMITS, AND APPROVALS

This Initial Study/Mitigated Negative Declaration (IS/MND) provides the environmental information and analysis and primary California Environmental Quality Act (CEQA) documentation necessary for the DSH to adequately consider the environmental effects of the proposed project. The DSH, as Lead Agency for the CEQA process and document, has the approval authority and responsibility for considering the environmental effects of the proposed project.

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3.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Less than Significant Impact" as indicated by the checklist in Chapter 3.0.

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

Some proposed projects that are not exempt from CEQA review may have little or no potential for adverse environmental impacts related to most of the topics in the Environmental Checklist; and/or potential impacts may involve only a few limited subject areas. These types of projects are generally minor in scope, located in a nonsensitive environment, and easily identifiable and without public controversy. For the environmental issue areas where there is no potential for significant environmental impact (and not checked above), the following findings can be made using the project description, environmental setting, or other information as supporting evidence.

☐ Check here if this finding is not applicable.

Finding: For the above referenced topics that are not checked off, there is no potential for significant environmental impact to occur from either construction, operation, or maintenance of the proposed project, and no further discussion in the Environmental Checklist is necessary.

Evidence:

Aesthetics: The City's General Plan does not identify any scenic vistas or scenic roadways within the City. According to the California Department of Transportation (Caltrans) Scenic Highway Mapping Program, there are no Designated or Proposed Scenic Highways in the vicinity of the proposed project.[1] The nearest State-designated scenic highway is a segment of State Route 91 (SR-91) located approximately 14.8 miles southeast of the project site. Due to distance and intervening land uses, no portion of the project site or surrounding area is viewable from the segment of SR-91 that is State-designated. The project site is currently developed, and there are no scenic resources (e.g., trees of significance, rock outcroppings, or historic buildings) within the project site. The proposed project is in an urbanized area, would not change the existing use of the project site, and would be consistent with the project site's existing zoning. Although the new water tanks would be taller than the existing tanks, the proposed project would not alter the visual character of the

[1] City of Norwalk. 1996. Vision Norwalk, The City of Norwalk General Plan. Website: https://www.norwalk.org/home/showpublisheddocument/20041/636561304601230000 (accessed September 16, 2024).

project site and would be consistent with the developed nature of the surrounding hospital campus. Additionally, the proposed project would not result in new sources of light or glare and, as such, would not impact day or nighttime views in the project area. Therefore, implementation of the proposed project would not result in impacts related to aesthetics.

Agriculture and Forest Resources: According to the California Department of Conservation Farmland Mapping and Monitoring Program (FMMP), the project site is designated as Urban and Built-Up Land.[2] Additionally, the project site is not under Williamson Act contract and is not zoned for agricultural use.[3] Because there are no farmlands or forest land in the vicinity of the proposed project, implementation of the proposed project would not result in impacts to agricultural and forestry resources.

Biological Resources: The project site is entirely developed and located within the Metropolitan State Hospital campus, which is surrounded by urban development. Based on the United States Fish and Wildlife Service (USFWS) Critical Habitat for Threatened and Endangered Species map,[4] the closest known critical habitat is approximately 5 miles southeast of the project site. Due to the developed nature of the project site and the surrounding area, no special-status species are anticipated to be directly affected by the proposed project due to a lack of suitable habitat. According to the National Wetlands Inventory[5] managed by the USFWS, the project site does not contain federally protected wetlands. According to the California Department of Fish and Wildlife's (CDFW) California Regional Conservation Plans map,[6] the project site is not located within an adopted Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP). Although there are no vegetation or trees within the fenced limits of the existing water tank facility, there are some ornamental trees along the west perimeter of the project site that flank the sidewalk along Balsam Street and have canopies that extend into the fenced water tank facility. Therefore, although the proposed project would not require any vegetation/tree removal or tree trimming, the ornamental trees along the project site's west perimeter could provide suitable nesting habitat for nesting birds. Nesting birds are protected pursuant to the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code (Sections 3503, 3503.5, 3511, and 3513 prohibit the take, possession, or destruction of birds, their nests, or their eggs). To comply with the MBTA and California Fish and Game Code and avoid impacts to nesting birds from implementation of the proposed project, if construction commences during the nesting bird season (February 1 through August 31) a pre-

2 California Department of Conservation. 2018a. California Important Farmland Finder. Website: https://maps.conservation.ca.gov/DLRP/CIFF/ (accessed September 16, 2024).

3 California Department of Conservation. 2018b. California Williamson Act Enrollment Finder. Website: https://maps.conservation.ca.gov/dlrp/WilliamsonAct/ (accessed September 16, 2024).

4 United States Fish and Wildlife Service (USFWS). n.d.-a. *USFWS Threatened & Endangered Species Active Critical Habitat Report.* Website: https://ecos.fws.gov/ecp/report/table/critical-habitat.html (accessed September 16, 2024).

5 United States Fish and Wildlife Service (USFWS). n.d.-b. National Wetlands Inventory Mapper. Website: https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/ (accessed September 16, 2024).

6 California Department of Fish and Wildlife (CDFW). 2019. California Natural Community Conservation Plans. Website: https://wildlife.ca.gov/conservation/planning/nccp/plans (accessed September 16, 2024).

construction nesting bird survey would be required prior to construction, as detailed in Regulatory Compliance Measures (RCM) BIO-1.

RCM BIO-1 **Nesting Bird Clearance Survey.** If construction/ground-disturbing activities, including demolition, occurs between February 1 and August 31, a Qualified Biologist shall conduct a pre-construction clearance survey for nesting birds within 3 days of the start of any construction, demolition, or earthmoving activities to ensure that no nesting birds are disturbed during construction. The Qualified Biologist shall be retained by the Construction Contractor. The Qualified Biologist conducting the clearance survey shall document a negative survey with a brief letter report indicating that no impacts to active avian nests would occur. If an active avian nest is discovered during the pre-construction clearance survey, the Qualified Biologist shall determine the appropriate no-disturbance buffer and construction activities shall stay outside of the established no-disturbance buffer. In general, the no-disturbance buffer shall be a minimum of 50 feet for passerines and 250 feet for raptors. However, a species' sensitivity to disturbance can vary among species, the level of noise or construction disturbance, and the line of sight between the nest and the disturbance. Limits of construction to avoid an active nest shall be established by the Qualified Biologist in the field with flagging, fencing, or other appropriate barriers, and construction personnel shall be instructed on the sensitivity of nest areas. A biological monitor with experience in monitoring active nests shall be present to delineate the boundaries of the buffer area, monitor daily all active nests to observe the efficacy of the no-disturbance buffers, and document any new nesting occurrences to ensure that nesting behavior is not adversely affected by the construction activity. Adversely affected nesting behavior, as determined by the biological monitor, includes, but is not limited to: disrupting reproductive behavior, nest abandonment, and/or prolonged absences of parents while incubating eggs. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, construction activities within the buffer area can occur. Field memorandums shall be prepared by the biological monitor within 24 hours of each day of monitoring and shall be submitted to the Department of State Hospitals (DSH) to document compliance with the applicable resource protection measures.

With implementation of RCM BIO-1, the proposed project would not result in impacts related to biological resources.

Geology and Soils: The project site is not within a Alquist-Priolo Earthquake fault, liquefaction, or landslide zone.[7] However, the project site is located in a region traditionally characterized by moderate to high seismic activity, which could result in damage to structures and other improvements due to ground shaking. The closest fault zone is the Whittier fault, located approximately 5.5 miles northeast of the project site.[8] The proposed project would be constructed

[7] California Geologic Survey. n.d. Earthquake Zones of Required Investigation. Website: https://maps.conservation.ca.gov/cgs/EQZApp/app/ (accessed September 16, 2024).

[8] Ibid.

in accordance with California Building Code (CBC) requirements that address structural seismic safety. During construction activities, soil would be exposed from excavation activities and there would be an increased potential for soil erosion compared to existing conditions. However, compliance with the Construction General Permit (CGP) would minimize soil erosion during construction. Additionally, the proposed project would not use septic tanks or alternative wastewater disposal systems and therefore would not result in impacts associated with soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems.

The maximum depth of excavation during construction would be 2.5 feet. The project site has been previously disturbed by development of the existing water tanks, pumphouses, and infrastructure. The proposed depth of excavation would not exceed the depth of excavation required for the previous development of the project site; therefore, all soil disturbance would be within existing fill. No native soils would be disturbed during project construction. Thus, the proposed project would not result in impacts to paleontological resources. Based on the above, implementation of the proposed project would not result in impacts related to geology and soils.

Hydrology and Water Quality. Construction activities would involve site disturbance, grading, and excavation of soil, which could result in temporary erosion and movement of sediments into the storm drain system, particularly during precipitation events. However, the proposed project would comply with the Construction General Permit, which requires preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) and best management practices (BMPs) to reduce impacts to water quality during construction activities. In addition, the proposed project would continue to comply with all applicable National Pollutant Discharge Elimination System (NPDES) permit requirements, including the Los Angeles County Municipal Separate Storm Sewer Systems (MS4) Permit, to reduce impacts to water quality during project operations. Therefore, the proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

The proposed project would meet the current water demands of Metropolitan State Hospital, would not increase the demand for water, and would not require groundwater extraction. Furthermore, the proposed project would not increase impervious surface areas and therefore would not interfere with groundwater recharge. Implementation of the proposed project would not alter the existing drainage pattern of the site and would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

The project site is not located within a Federal Emergency Management Agency (FEMA) designated 100-year floodplain, a tsunami hazard area, or a seiche zone and therefore would not result in impacts associated with flood flows or the release of pollutants from inundation.

Therefore, implementation of the proposed project would not result in impacts related to hydrology and water quality.

Land Use and Planning: The proposed project would replace two existing water tanks and associated infrastructure within the existing Metropolitan State Hospital campus. The proposed project would not construct new roadways or structures that would physically divide an established

community. The proposed project is consistent with the City's General Plan land use designation and Zoning Code and would not change the existing use of the project site. Furthermore, with implementation of identified RCMs and mitigation measures, the proposed project would not have any significant environmental impacts. Therefore, implementation of the proposed project would not result in impacts related to land use and planning.

Mineral Resources: The proposed project is not located within an area classified as a Mineral Resource Zone. No mineral resources have been identified in the project area.[9] Implementation of the proposed project would not result in the loss of availability of any known mineral resources. Therefore, implementation of the proposed project would not result in impacts to mineral resources.

Public Services: Public services are currently being provided to the Metropolitan State Hospital campus, including fire and police services. Fire and police services for the project site and the surrounding area are and would continue to be provided by the County of Los Angeles (County). The closest fire station, Station 20, located at 12110 East Adoree Street, is approximately 0.64 mile southwest of the project site.[10] Police services for the project site and the surrounding area are and would continue to be provided by the County Sheriff's Department. The Norwalk Sheriff's Station located at 12335 Civic Center Drive in Norwalk is approximately 0.5 mile southwest of the project site.[11] Implementation of the proposed project would not change the existing use of the project site. The proposed project involves replacing existing infrastructure and would not result in an increase in the number of structures, employees, or residents; therefore, the project would not increase the demand for fire or police services. Furthermore, the proposed project would provide a beneficial impact to existing fire services. The existing water tanks are being replaced to address safety issues and meet current standards. The replacement of Tank #2 would provide dedicated fire-related water storage, which is not currently available on the hospital campus. The availability of 1 million gallons of water for fire suppression use would benefit and aid fire protection services at the hospital campus. Because the proposed project is a water tank replacement project, it would not generate the need for additional schools, park space, or other public services in the project vicinity. Therefore, implementation of the proposed project would not result in adverse impacts to public services.

Recreation: The proposed project does not include the construction of new housing, nor would it cause an increase in the housing supply indirectly through increased demand for housing. The proposed project involves replacing existing infrastructure and would not result in an increase in the number of existing employees or residents. Therefore, the proposed project would not generate an increased demand for park space or recreational facilities. While there are no existing parks or

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9 County of Los Angeles. 2014. General Plan Conservation Element, Figure 9.6 Mineral Resources. Website: https://planning.lacounty.gov/wp-content/uploads/2022/11/9.1_Chapter9_Figures.pdf (accessed September 16, 2024).

10 County of Los Angeles. n.d.-a. Los Angeles County Fire Department – Station 20. Website: https://locator.lacounty.gov/fire/Location/3298550/los-angeles-county-fire-department---station-20 (accessed September 16, 2024).

11 County of Los Angeles. n.d.-b. Norwalk Sheriff's Department. Website: https://lasd.org/norwalk/ (accessed September 16, 2024).

recreational facilities within the project area, there are existing open space areas within the Metropolitan State Hospital campus that provide passive recreation areas for hospital patients and employees. Implementation of the proposed project would not increase the use of recreational facilities with the project area such that substantial physical deterioration of the facility would occur or be accelerated. Additionally, the proposed project does not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, implementation of the proposed project would not result in impacts related to recreation.

Utilities/Service Systems:

- **Wastewater.** The proposed project does not involve uses requiring wastewater treatment and therefore would not increase demand for wastewater treatment during project operations. Wastewater generated during construction of the proposed project would be minimal and temporary, and would not exceed the capacity of the existing wastewater treatment facility. Therefore, the proposed project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities.

- **Water.** The proposed project may result in short-term demand for water during excavation and construction activities. Water demand during construction activities (e.g., dust control) would be temporary. These uses would cease when construction is complete. Construction activities would require minimal water and would not result in adverse impacts on the existing water system or available water supplies. Water storage would be maintained for the Metropolitan State Hospital campus during construction by bringing the existing Tank #2 into service during the replacement of existing Tank #1 (Phase 1 of construction).

  The proposed project would replace the two existing 750,000-gallon water tanks with two new 1 million-gallon water tanks, demolish the existing nonpotable water pumphouse, and replace piping, valving, and appurtenances. The proposed tanks would be the same diameter as the existing tanks but taller. Because the proposed water tanks would be taller, they would provide increased capacity. However, the purpose of the proposed project is to replace the existing outdated water tanks with new water tanks that meet current standards. Although capacity could be increased based on the size of the new tanks, the proposed project would not increase water demand and would not result in any increased water pumping when compared to existing conditions. The proposed project would not require or result in the construction of new water treatment facilities or expansion of existing facilities.

- **Stormwater Runoff.** The proposed project would not require or result in the construction of new stormwater drainage facilities or require the expansion of existing facilities. The proposed project would replace the existing water tanks on site with water tanks that are taller but of the same diameter, and would not increase the total impervious surface area on the project site. Refer to Section 4.10, Hydrology and Water Quality, for a discussion of drainage associated with the proposed project.

- **Solid Waste.** The proposed project would generate a nominal amount of construction waste that would require disposal in local landfills. Construction waste would be recycled as appropriate. The proposed project would not generate solid waste during project operation.

Therefore, the proposed project would not increase the demand for solid waste disposal (landfill service) facilities.

- **Electric Power/Natural Gas.** The proposed project would require the removal and replacement of existing electrical conductors and conduits that are part of the existing water tank infrastructure. Short-term construction activities would increase the use of electricity to provide power to the project site and to service portable construction equipment. However, the use of electricity for construction activities would be temporary and would not substantially increase the long term demand for electricity. Because the water tanks would be replaced with water tanks requiring similar electrical infrastructure, the proposed project would not result in an increase in the long-term demand for electricity in Norwalk or require the relocation of electric power facilities. Additionally, the proposed project would not use natural gas for construction or operation. Therefore, construction activities would not impact natural gas services, and the proposed project would not require new or physically altered gas transmission facilities.

- **Telecommunications.** The new water tanks would be installed in the same location as the existing water tanks. The proposed project would not require relocation of any existing telecommunication facilities.

  As discussed above, the proposed project would not result in impacts related to wastewater, water, stormwater runoff, solid waste services, electric power, natural gas, or telecommunications facilities. Therefore, the proposed project would not result in impacts to utilities and service systems.

Wildfire: The project site is relatively flat, developed, and located in an urban area. The project site is not within a State Responsibility Area (SRA)[12] and is located within a Non-Very High Fire Hazard Severity Zone (Non-VHFHSZ) within a Local Responsibility Area (LRA).[13] The proposed project would replace the two existing water tanks with the same diameter but taller water tanks and replace piping, valving, and appurtenances associated with the new water tanks and existing pumphouses. The proposed project would also verify/complete connections from the existing 12-inch firewater main to the existing sprinkler system supply lines in the Metropolitan State Hospital campus' central kitchen, administration building, and skilled nursing facility. Implementation of the proposed project would provide a designated fire water storage tank (Tank #2) to supply water for fire suppression needs. Implementation of the proposed project would not increase the risk of wildland fires for area residences. Phases 1 and 2 of construction would be completed in approximately 12 months each and would not require any road closures or detours. The City's General Plan and Local Hazard Mitigation Plan do not designate evacuation routes within Norwalk. However, the County Public Works Department designates Imperial Highway, located approximately 0.25 mile south of the

12 California Department of Forestry and Fire Protection (CAL FIRE). 2023. Fire Hazard Severity Zones in State Responsibility Area. Website: https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones (accessed September 11, 2024).

13 California Department of Forestry and Fire Protection (CAL FIRE). 2011. Very High Fire Hazard Severity Zones in LRA. Website: https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/osfm-website/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones/fire-hazard-severity-zones-map/upload-4/losangelescounty.pdf (accessed September 11, 2011).

proposed project, as a disaster route.[14] The proposed project would not involve any work or other disruption on Imperial Highway and therefore would not substantially impair an adopted emergency response plan or emergency evacuation plan. Additionally, because there are no slopes within the project site or the immediately surrounding urban area, and the project site is developed, implementation of the proposed project would not exacerbate wildfire risks or secondary risks associated with wildfire such as flooding, landslides, or slope instability. Therefore, implementation of the proposed project would not result in impacts related to wildfire.

3.1 DETERMINATION

On the basis of this initial evaluation:

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

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

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

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

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

Signature _____ Date _____

[14] County of Los Angeles Department of Public Works. 2008. City of Norwalk Disaster Route Maps. Website: https://pw.lacounty.gov/dsg/disasterroutes/map/Norwalk.pdf (accessed September 11, 2024).

4.0 CEQA ENVIRONMENTAL CHECKLIST

4.1 AESTHETICS

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

Proposed project construction and operation would not result in impacts related to aesthetics. No analysis is required. Refer to Section 3.0, Environmental Factors Potentially Affected, including Section 3.1, Determination, for a more detailed discussion of the proposed project and aesthetics.

4.2 AGRICULTURE AND FOREST RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Proposed project construction and operation would not result in impacts to agriculture or forest resources. No analysis is required. Refer to Section 3.0, Environmental Factors Potentially Affected, including Section 3.1, Determination, for a more detailed discussion of the proposed project and agriculture and forest resources.

4.3 AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

4.3.1 Impact Analysis

The proposed project is within the South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) is the regional government agency that monitors and regulates air pollution within the Basin. The federal Clean Air Act and the California Clean Air Act mandate the control and reduction of specific air pollutants. Under these acts, the United States Environmental Protection Agency (USEPA) and the CARB have established ambient air quality standards (AAQS) for specific "criteria" pollutants, designed to protect public health and welfare. Primary criteria pollutants include carbon monoxide (CO), volatile organic compounds (VOC), nitrogen oxides (NO_X), particulate matter less than 10 microns in size (PM_{10}), sulfur dioxide (SO_2), and lead (Pb). Secondary criteria pollutants include ozone (O_3), and particulate matter less than 2.5 microns in size ($PM_{2.5}$). The AAQS for each criteria pollutant represents the level that is considered safe to the public and avoids specific adverse health effects associated with each criteria pollutant.

The Basin is in nonattainment for the federal and State standards for O_3 and $PM_{2.5}$, and nonattainment for the State PM_{10} standard. The Basin is in attainment/maintenance for the federal PM_{10}, CO, SO_2, and nitrogen dioxide (NO_2) standards. The SCAQMD has established project-level thresholds for VOC, NO_X, CO, SO_2, PM_{10}, and $PM_{2.5}$.

The SCAQMD considers any project in the Basin with construction- or operation-related emissions that exceed any of the emission thresholds shown in Table 4.A to have potentially significant impacts.

Table 4.A: SCAQMD Construction and Operation Thresholds of Significance (lbs/day)

Emission Source	Pollutant Emissions Threshold (lbs/day)					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Construction Thresholds	75	100	550	150	150	55
Operation Thresholds	55	55	550	150	150	55

Source: South Coast Air Quality Management District (1993).
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SO_2 = sulfur dioxide
VOC = volatile organic compounds

In addition, the SCAQMD published its Final Localized Significance Threshold Methodology in June 2003 (updated July 2008), recommending that all air quality analyses include an assessment of air quality impacts to nearby sensitive receptors.[15] This guidance was used to analyze potential localized air quality impacts associated with construction of the proposed project. Localized significance thresholds (LSTs) are developed based on the size or total area of the emission source, the ambient air quality in the source receptor area, and the distance between the project and the nearest sensitive receptor. The SCAQMD defines structures that house persons (e.g., children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise) or places where they gather as sensitive receptors (i.e., residences, schools, playgrounds, childcare centers, convalescent centers, retirement homes, and athletic fields). The nearest sensitive receptors to the project site are existing single-family residences opposite Balsam Street located approximately 75 feet west of the project site boundary line.

LSTs are based on the ambient concentrations of that pollutant within the project SRA and the distance to the nearest sensitive receptor. For the proposed project, the appropriate SRA for the LST is southeast Los Angeles County (SRA 5). SCAQMD provides LST screening tables for 25-, 50-, 100-, 200-, and 500-meter source-receptor distances. As mentioned above, the closest sensitive receptors to the project site are existing single-family residences opposite Balsam Street located approximately 75 feet west of the project site boundary line. In cases where receptors may be closer than 82 feet (25 meters), any distances within the 82-foot (25-meter) buffer zone can be used. As such, the minimum distance of 25 meters was used for purposes of the LST assessment. The project site is approximately 1.3 acres. However, based on the anticipated construction equipment and the anticipated grading and ground-disturbing activities, it is assumed that the maximum daily disturbed area for the proposed project would be 2.5 acres.[16] As such, the LSTs for a 2.5-acre site at 25 meters were derived by interpolation. The 2.5-acre threshold represents a conservative assumption since it assumes multiple phases of grading. Table 4.B shows the emissions thresholds that would apply based on the project size and distance to nearby receptors during project construction and operation.

[15] South Coast Air Quality Management District (SCAQMD). 2008. *Final Localized Significance Threshold Methodology.* July. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf (accessed January 2025).

[16] South Coast Air Quality Management District (SCAQMD). n.d. Fact Sheet for Applying CalEEMod to Localized Significance Thresholds. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf (accessed January 2025).

Table 4.B: SCAQMD Localized Significance Thresholds

Emissions Source	Pollutant Emissions Threshold (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Construction	124.0	964.0	8.2	4.5
Operation	124.0	964.0	2.3	1.2

Source: *Final Localized Significance Threshold Methodology.* (SCAQMD 2008).
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
SCAQMD = South Coast Air Quality Management District

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

Less Than Significant. An Air Quality Management Plan (AQMP) describes air pollution control strategies to be undertaken by a city or county in a region classified as a nonattainment area to meet the requirements of the federal Clean Air Act. The main purpose of an AQMP is to bring an area into compliance with the requirements of federal and State AAQS. The Basin is in nonattainment for the federal and State standards for O_3 and $PM_{2.5}$. Therefore, the Basin is classified as a nonattainment area and an AQMP is required. The applicable air quality plan is the SCAQMD's adopted 2022 AQMP.[17] The AQMP is based on regional growth projections developed by the Southern California Association of Governments (SCAG).

A consistency determination plays an essential role in local agency project review by linking local planning and unique individual projects to the air quality plans. A consistency determination fulfills the CEQA goal of fully informing local agency decision-makers of the environmental costs of the project under consideration at a stage early enough to ensure that air quality concerns are addressed. Only new or amended General Plan elements, Specific Plans, and significantly unique projects need to undergo a consistency review given that the air quality plan strategy is based on projections from local General Plans.

The City's General Plan is consistent with the SCAG Regional Comprehensive Plan Guidelines and the SCAQMD AQMP. Pursuant to the methodology provided in the SCAQMD *CEQA Air Quality Handbook,*[18] consistency with the Basin 2022 AQMP is affirmed when a project: (1) would not increase the frequency or severity of an air quality standards violation or cause a new violation, and (2) is consistent with the growth assumptions in the AQMP. The consistency review is as follows:

1. The proposed project would result in short-term construction and long-term operational pollutant emissions that are all less than the CEQA significance emissions thresholds established by SCAQMD, as demonstrated in Section 4.3.b, below. Therefore, the proposed project would not result in an increase in the frequency or severity of an air quality standards violation or cause a new air quality standards violation.

17 South Coast Air Quality Management District (SCAQMD). 2022. *2022 Air Quality Management Plan.* Adopted December 2, 2022.

18 South Coast Air Quality Management District (SCAQMD). 1993. *CEQA Air Quality Handbook.*

2. The *CEQA Air Quality Handbook* indicates that consistency with AQMP growth assumptions must be analyzed for new or amended General Plan elements, Specific Plans, and significant projects. Significant projects include airports, electrical generating facilities, petroleum and gas refineries, designation of oil drilling districts, water ports, solid waste disposal sites, and offshore drilling facilities. The proposed project would replace the two existing 750,000-gallon water tanks with two new 1 million-gallon water tanks; demolish the existing nonpotable water pumphouse; and replace piping, valving, and appurtenances associated with the new water tanks and existing pumphouses. Therefore, the proposed project is not defined as significant. In addition, the proposed project would not require a change to the General Plan land use designation or the current zoning and would be consistent with the City's General Plan and Zoning Ordinance.

Based on the consistency analysis presented above, the proposed project would not conflict with or obstruct implementation of the applicable air quality plan. Impacts would be less than significant, and no mitigation is required.

b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Less Than Significant. As identified above, the Basin is currently designated nonattainment for the federal and State standards for O_3 and $PM_{2.5}$. The Basin's nonattainment status is attributed to the region's development history. Past, present, and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, to result in nonattainment of AAQS. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant.

In developing thresholds of significance for air pollutants, the SCAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified SCAQMD significance thresholds identified above in Table 4.B, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. Therefore, additional analysis to assess cumulative impacts is not necessary. The following analysis assesses the potential project-level air quality impacts associated with construction and operation of the proposed project.

Construction Emissions. During construction, short-term degradation of air quality may occur due to the release of particulate matter emissions (i.e., fugitive dust) generated by site preparation and grading activities. Emissions from construction equipment are also anticipated and would include CO, NO_X, VOC, directly emitted $PM_{2.5}$ or PM_{10}, and toxic air contaminants such as diesel exhaust particulate matter.

Project construction activities would include demolition; site preparation; grading; construction of tanks; replacement of piping, valving, and appurtenances; and architectural coating activities (e.g., paint, stains, and sealers). Construction-related effects on air quality from the proposed project would be greatest during the site preparation phase due to the disturbance of soils. If

not properly controlled, these activities would temporarily generate particulate emissions. Sources of fugitive dust would include disturbed soils at the construction site. Unless properly controlled, vehicles leaving the site would deposit dirt and mud on local streets, which could be an additional source of airborne dust after it dries. PM_{10} emissions would vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. PM_{10} emissions would depend on soil moisture, silt content of soil, wind speed, and amount of operating equipment. Larger dust particles would settle near the source, whereas fine particles would be dispersed over greater distances from the construction site.

Water or other soil stabilizers can be used to control dust, resulting in emission reductions of 50 percent or more. SCAQMD has established Rule 403: Fugitive Dust, which would require the DSH to implement measures that would reduce the amount of particulate matter generated during the construction period. The Rule 403 measures that were incorporated in this analysis include:

- Water active sites at least three times daily (locations where grading is to occur shall be thoroughly watered prior to earthmoving).

- Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 2 feet (0.6 meter) of freeboard (vertical space between the top of the load and the top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114.

In addition to dust-related PM_{10} emissions, heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO, sulfur oxides (SO_X), NO_X, VOCs, and some soot particulate ($PM_{2.5}$ and PM_{10}) in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles idle in traffic. These emissions would be temporary in nature and limited to the immediate area surrounding the construction site.

Construction emissions were estimated for the project using the California Emissions Estimator Model version 2022.1 (CalEEMod). The proposed project is planned to be constructed in two phases. Construction is expected to take approximately 12 months for each phase; Phase 1 is anticipated to begin in late 2025 and Phase 2 is anticipated to begin at the end of 2026. To be conservative, this analysis assumes that the phases would occur consecutively for a total period of 24 months. The proposed project would include the demolition and replacement of the two existing 750,000-gallon water tanks and demolition of the existing approximately 267-square-foot nonpotable water pumphouse, which was included in CalEEMod. In addition, the proposed project would require the export of approximately 45 cubic yards (cy) of soil per construction phase, for a total of 90 cy of soil export for the project, which was also included in CalEEMod. Construction phases are expected to include demolition, site preparation, grading, construction, and architectural coating (e.g., paint). Project construction would include the use of standard earthmoving equipment such as large excavators, a skid steer, a telehandler, and other related equipment. This analysis assumes compliance with SCAQMD Rule 403 measures and the use of Tier 2 construction equipment. All other construction details are not yet known; therefore, default assumptions (e.g., construction hauling and vendor truck trips and fleet activities) from

CalEEMod were used. Construction emissions are summarized in Table 4.C, below. Appendix A provides CalEEMod output sheets.[19]

Table 4.C: Short-Term Regional Construction Emissions

Construction Year	Peak Daily Regional Pollutant Emissions (lbs/day)							
	VOCs	NO_X	CO	SO_X	Fugitive PM_{10}	Exhaust PM_{10}	Fugitive $PM_{2.5}$	Exhaust $PM_{2.5}$
2025	0.7	20.1	15.5	<0.1	0.5	0.7	0.1	0.6
2026	0.7	20.1	15.4	<0.1	2.9	0.7	1.4	0.6
2027	3.8	13.5	10.8	<0.1	0.1	0.6	<0.1	0.5
Peak Daily Emissions	3.8	20.1	15.5	<0.1	3.6		2.0	
SCAQMD Threshold	**75.0**	**100.0**	**550.0**	**150.0**	**150.0**		**55.0**	
Significant?	**No**	**No**	**No**	**No**	**No**		**No**	

Source: Compiled by LSA Associates, Inc. (January 2025).
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOCs = volatile organic compounds

As shown in Table 4.C, construction emissions associated with the project would not exceed the SCAQMD's thresholds for VOC, NO_X, CO, SO_X, $PM_{2.5}$, and PM_{10}. Therefore, construction of the proposed project would not result in a cumulatively considerable increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State AAQS. Impacts would be less than significant, and no mitigation is required.

Operational Emissions. Long-term air pollutant emission impacts are those associated with mobile sources (e.g., vehicle trips), energy sources (e.g., electricity), and area sources (e.g., landscape maintenance equipment use) related to the proposed project. The proposed project would replace the two existing 750,000-gallon water tanks with two new 1 million-gallon water tanks, demolish the existing nonpotable water pumphouse, and replace piping, valving, and appurtenances. The proposed tanks would be the same diameter as the existing tanks but taller. Because the proposed water tanks would be taller, they would provide increased capacity. However, the purpose of the proposed project is to replace the existing outdated water tanks with new water tanks that meet current standards. Although capacity could be increased based on the size of the new tanks, the proposed project would not increase water demand and would not result in any increased water pumping when compared to existing conditions. Additionally, the proposed project does not include new pumps or associated pump equipment that would result in stationary-source emissions. Moreover, the existing pumps are required to comply with rules and regulations established by the SCAQMD for stationary sources, including Regulation IX, Source Specific Standards, and Regulation X, National Emission Standards for Hazardous Air Pollutants.

Upon completion of construction activities, operation and maintenance associated with the proposed project would remain the same as currently occurs for the existing water tanks. Based

[19] LSA Associates, Inc. 2025. CalEEMod Output Sheets. January. Appendix A.

on Section 4.17, Transportation, no additional trips are anticipated due to implementation of the proposed project. As such, the proposed project would not result in a significant increase in the generation of vehicle trips or vehicle miles traveled (VMT) that would increase air pollutant emissions. The proposed project would not result in a substantial source of energy- or area-source emissions. Therefore, operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State AAQS. Impacts would be less than significant, and no mitigation is required.

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

Less Than Significant. Sensitive receptors are people who have an increased sensitivity to air pollution or environmental contaminants. The SCAQMD defines structures that house persons (e.g., children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise) or places where they gather (i.e., residences, schools, playgrounds, childcare centers, convalescent centers, retirement homes, and athletic fields) as sensitive receptors.

As previously discussed, LSTs are based on the ambient concentrations of that pollutant within the project SRA and the distance to the nearest sensitive receptor. The nearest sensitive receptors to the project site are existing single-family residences opposite Balsam Street located approximately 75 feet west of the area of the project site boundary line. An LST analysis was completed to show the construction impacts at a distance of 25 meters (82 feet) to the nearest sensitive receptors at SRA 5.

The results of the LST analysis for construction of the proposed project are summarized in Table 4.3.D, below. As shown in Table 4.D, the proposed project would not result in an exceedance of a SCAQMD LST during project construction. Additionally, as discussed in Threshold 4.3.b, the proposed project operational activities would not be considered significant. As discussed above, the proposed project does not include new pumps or associated pump equipment that would result in stationary-source emissions. Moreover, the existing pumps are required to comply with rules and regulations established by the SCAQMD for stationary sources, including Regulation IX, Source Specific Standards, and Regulation X, National Emission Standards for Hazardous Air Pollutants. In addition, the proposed project would continue to meet the water current demands of the hospital facilities and would not result in additional operational activities compared to existing conditions. Therefore, the proposed project would not expose sensitive receptors to substantial pollutant concentrations during project construction or operation. Impacts would be less than significant, and mitigation is not required.

Table 4.D: Project Localized Construction Emissions (in Pounds per Day)

Source	NO_X	CO	Total PM_{10}	Total $PM_{2.5}$
On-Site Project Emissions	19.6	14.6	3.3	1.8
Localized Significance Threshold	124.0	964.0	8.2	4.5
Exceeds Threshold?	**No**	**No**	**No**	**No**

Source: Compiled by LSA (January 2025).
Note: Source Receptor Area 5, based on a 2.5-acre construction disturbance daily area, at a distance of 75 feet (23 meters).
CO = carbon monoxide
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size

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

Less Than Significant. The proposed project's potential to result in emissions adversely affecting a substantial number of people is described below.

Construction. Project construction would generate limited odors over the short term, primarily from equipment exhaust. However, construction activity would be temporary and would cease after individual construction is completed. Additionally, construction activities that would generate odors are expected to be isolated to the immediate vicinity of the construction site. Therefore, odors from construction equipment exhaust would not adversely affect a substantial number of people.

Additionally, the proposed project would be required to implement standard control measures to limit fugitive dust and construction equipment emissions, which would reduce odor impacts, in accordance with SCAQMD Rules 402 and 1113. SCAQMD Rule 402 regarding nuisances states: "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property." SCAQMD Rule 1113 limits the VOC content of architectural coatings (e.g., paint, stains, and sealers). Adherence to the standards identified in SCAQMD Rules 402 and 1113 is required for all construction projects to reduce emissions and objectionable odors impacts.

Furthermore, as previously discussed, construction activities would be temporary, and odors generated from construction activities would be isolated to the immediate vicinity of the construction site. Therefore, project construction activities would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Impacts would be less than significant, and no mitigation is required.

Operation. According to SCAQMD, land uses generally associated with odor complaints include agricultural uses (livestock and farming), wastewater treatment plants, food processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities. The proposed project would replace the two existing 750,000-gallon water tanks with two new 1 million-gallon water tanks, demolish the existing nonpotable water pumphouse, and replace piping, valving, and appurtenances. As such, the proposed project does not include any land uses identified by SCAQMD as being associated with emitting objectionable odors. Minor odors related to pump equipment exhaust may occur during operation of the proposed project; however, these would be consistent with the existing uses and would not be expected to increase because of implementation of the proposed project.

Therefore, operation of the proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Impacts would be less than significant, and no mitigation is required.

4.4 BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Proposed project construction and operation would not result in impacts to biological resources. No analysis is required. Refer to Section 3.0, Environmental Factors Potentially Affected, including Section 3.1, Determination, for a more detailed discussion of the proposed project and biological resources.

4.5 CULTURAL RESOURCES

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

4.5.1 Impact Analysis

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

The discussion and analysis provided in this section is based on the *Historical Significance Evaluation* (LSA Associates, Inc., December 2024) provided in Appendix B.[20]

No Impact. CEQA defines a "historical resource" as a resource that meets one or more of the following criteria: (1) listed in, or determined eligible for listing in, the California Register of Historical Places (California Register); (2) listed in a local register of historical resources as defined in the California PRC Section 5020.1(k); (3) identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); or (4) determined to be a historical resource by a project's lead agency (PRC Section 21084.1 and *State CEQA Guidelines* Section 15064.5(a)).

The project site is developed with two historic-period (50 years of age or older) water tanks (Tanks #1 and #2) and two historic-period pumphouses. In 2017, Metropolitan State Hospital was identified as a historic district eligible for listing in the National Register of Historic Places (National Register) and the California Register. As a result of this determination, the property is listed in the California Register and is included in the Master List of State-owned properties. It is also eligible for designation as a California State Historic Landmark. Although located on the Metropolitan State Hospital campus, Tanks #1 and #2 and associated infrastructure are located more than 800 feet south of the historic district.

As described in the *Historical Significance Evaluation*, Tanks #1 and #2 and associated infrastructure are not eligible for listing in the National Register or California Register or for designation as a California Historical Landmark. Additionally, these resources are not "historical resources" as defined by CEQA.

The proposed project would not cause a substantial change in the significance of a historical resource pursuant to *State CEQA Guidelines* Section 15064.5, and no mitigation is required.

[20] LSA Associates, Inc. 2024. *Historical Significance Evaluation.* December. Appendix B.

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

Less than Significant Impact. In its existing condition, the project site is completely disturbed and developed. The project site contains two water tanks, a fire water pumphouse, an irrigation pumphouse, potable and non-potable water pumphouses, and associated infrastructure. The existing Tank #1 was constructed in 1955 and the existing Tank #2 was constructed circa 1960. The proposed project would require ground disturbance to replace the existing two tank foundations within the project site. The maximum depth of excavation during construction would be 2.5 feet. Because the proposed depth of excavation would not exceed the depth of excavation required for the previous development of the project site and the excavation would take place in existing fill and not native soils, the proposed project is not anticipated to result in impacts to unknown archaeological resources and no mitigation is required.

c. Would the project disturb any humans remains, including those interred outside of formal cemeteries?

Less than Significant Impact. There are no known human remains at the project site. Furthermore, as described in Checklist Response 4.5.b, above, the project site has been previously disturbed by development of the existing water tanks, pumphouses, and infrastructure. The proposed project would require ground disturbance to replace the existing two tank foundations within the project site. The maximum depth of excavation during construction would be 2.5 feet. Because the proposed depth of excavation would not exceed the depth of excavation required for the previous development of the project site and the excavation would take place in existing fill and not native soils, the proposed project is not anticipated to result in impacts to unknown human remains and no mitigation is required.

4.6 ENERGY

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

4.6.1 Impact Analysis

The proposed project is within the service territory of Southern California Edison (SCE). SCE provides electricity to more than 15 million people in a 50,000-square-mile area of Central, Coastal, and Southern California.[21] According to the California Energy Commission (CEC), total electricity consumption in the SCE service area in 2022 was 85,870.0 gigawatt-hours (GWh), or 85,869,985,679 kilowatt-hours (kWh). Total electricity consumption in Los Angeles County in 2022 was 68,485 GWh, or 68,484,956,280 kWh.[22]

Gasoline is the most used transportation fuel in California, with 97 percent of all gasoline being consumed by light-duty cars, pickup trucks, and sport utility vehicles. According to the most recent data available, total gasoline consumption in California was 289,918 thousand barrels or 1,464.7 trillion British thermal units (BTU) in 2020.[23] Of the total gasoline consumption, 273,289 thousand barrels, or 1,380.7 trillion BTU, were consumed for transportation.[24] Based on fuel consumption obtained from CARB's California Emissions Factor Model, Version 2021 (EMFAC2021), 3,733.4 million gallons of gasoline and 618.6 million gallons of diesel will be consumed from vehicle trips in Los Angeles County in 2025.[25]

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21 Southern California Edison (SCE). 2020. About Us. Website: https://www.sce.com/about-us (accessed January 2025).

22 California Energy Commission (CEC). 2020. Electricity Consumption by County and Entity. Website: http://www.ecdms.energy.ca.gov/ (accessed January 2025).

23 A British thermal unit is defined as the amount of heat required to raise the temperature of 1 pound of water by 1 degree Fahrenheit.

24 United States Department of Energy (EIA). 2021. California State Profile and Energy Estimates. Table F3: Motor gasoline consumption, price, and expenditure estimates, 2020. Website: eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_mg.html&sid=CA (accessed January 2025).

25 California Emission Factor Model, Version 2021 (EMFAC2021). *Gasoline and Diesel*. Website: https://arb.ca.gov/emfac/emissions-inventory/ce50d9e86eb957cc867de9beade468a55b364a2c (accessed January 2025).

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

Less Than Significant. The proposed project replaces existing water tanks and associated infrastructure and would not increase the demand for electricity and gasoline when compared to existing site conditions. The discussion and analysis provided below is based on the data included in the CalEEMod output, which is included in Appendix A.[26]

Construction-Period Energy Use. The anticipated construction schedule is expected to take a total of approximately 24 months. The proposed project would replace the two existing 750,000-gallon water tanks with two new 1 million-gallon water tanks, demolish the existing nonpotable water pumphouse, and replace piping, valving, and appurtenances. Project construction activities would include demolition, site preparation, grading, construction of tanks, and architectural coating activities (e.g., paints).

Construction of the proposed project would require energy for the manufacture and transportation of building materials and for preparation of the site for grading activities and construction. Petroleum fuels (e.g., diesel and gasoline) would be the primary sources of energy for these activities.

Construction activities are not anticipated to result in an inefficient use of energy because gasoline and diesel fuel would be supplied by construction contractors that would conserve the use of their supplies to minimize their costs on the proposed project. Energy usage within the project site during construction would be temporary in nature and would be relatively small in comparison to the State's available energy sources. Therefore, construction energy impacts would be less than significant, and no mitigation is required.

Operational Energy Use. Operational energy use is typically associated with natural gas use, electricity consumption, and fuel used for vehicle trips associated with a project.

As discussed above, the proposed project would replace the existing water tanks on the Metropolitan State Hospital campus to meet current standards. As described in Section 4.3, Air Quality, the proposed project would continue to meet the current demands of the Metropolitan State Hospital facilities. Although capacity could be increased based on the size of the new tanks, the proposed project would not increase water demand and would not result in any increased water pumping when compared to existing conditions. Additionally, the proposed project does not include new pumps or associated pump equipment that would result in additional energy consumption. Moreover, the existing pumps are required to comply with rules and regulations established by the SCAQMD for stationary sources, including Regulation IX, Source Specific Standards, and Regulation X, National Emission Standards for Hazardous Air Pollutants. Upon completion of construction activities, operation and maintenance associated with the proposed project would remain the same as currently occurs for the existing water tanks. As described in Section 4.17, Transportation, no additional trips are anticipated due to

[26] LSA Associates, Inc. 2025. CalEEMod Output Sheets. January. Appendix A.

implementation of the proposed project; as such, the proposed project is not expected to generate a substantial increase in fuel used for vehicle trips. Implementation of the proposed project would not result in additional energy consumption. Therefore, the proposed project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant, and no mitigation is required.

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

Less Than Significant. As indicated above, energy usage during construction would be temporary in nature. In addition, once operational, the proposed project would not result in additional energy consumption. As such, the proposed project would not conflict with California's energy conservation plans as described in the CEC's 2023 Integrated Energy Policy Report.[27] Thus, as shown above, the proposed project would avoid or reduce the inefficient, wasteful, and unnecessary consumption of energy and would not result in any irreversible or irretrievable commitments of energy. Therefore, the proposed project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. Impacts would be less than significant, and no mitigation is required.

[27] California Energy Commission (CEC). 2023. 2023 Integrated Energy Policy Report. Website: https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report-iepr/2023-integrated-energy-policy-report (accessed March 2025).

4.7 GEOLOGY AND SOILS

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

Proposed project construction and operation would not result in impacts related to geology and soils. No analysis is required. Refer to Section 3.0, Environmental Factors Potentially Affected, including Section 3.1, Determination, for a more detailed discussion of the proposed project and geology and soils.

4.8 GREENHOUSE GAS EMISSIONS

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

4.8.1 Impact Analysis

Greenhouse gases (GHGs) are present in the atmosphere naturally, are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. The gases that are widely seen as the principal contributors to human-induced global climate change are:

- Carbon dioxide (CO_2)
- Methane (CH_4)
- Nitrous oxide (N_2O)
- Hydrofluorocarbons (HFCs)
- Perfluorocarbons (PFCs)
- Sulfur hexafluoride (SF_6)

Over the last 200 years, humans have caused substantial quantities of GHGs to be released into the atmosphere. These extra emissions are increasing GHG concentrations in the atmosphere and enhancing the natural greenhouse effect, which is believed to be causing global warming. While manmade GHGs include naturally occurring GHGs such as CO_2, CH_4, and N_2O, some gases, like HFCs, PFCs, and SF_6, are completely new to the atmosphere.

Certain gases, such as water vapor, are short-lived in the atmosphere. Others remain in the atmosphere for significant periods of time, contributing to climate change in the long term. Water vapor is excluded from the list of GHGs above because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

These gases vary considerably in terms of Global Warming Potential (GWP), which is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The GWP is based on several factors, including the relative effectiveness of a gas to absorb infrared radiation and length of time that the gas remains in the atmosphere ("atmospheric lifetime"). The GWP of each gas is measured relative to CO_2, the most abundant GHG; the definition of GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to the ratio of heat trapped by one unit mass of CO_2 over a specified time period. GHG emissions are typically measured in terms of pounds or tons of "CO_2 equivalents" (CO_2e).

State CEQA Guidelines Section 15064(b) provides that the "determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data," and further states that an "ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting."

Appendix G of the *State CEQA Guidelines* includes significance thresholds for GHG emissions. A project would normally have a significant effect on the environment if it would do either of the following:

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

Currently, there is no statewide GHG emissions threshold that has been used to determine the potential GHG emissions impacts of a project. Threshold methodology and thresholds are currently developed and revised by air districts in California.

a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant. In October 2008, the SCAQMD released a *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold* that suggested a tiered approach to analyzing GHG emissions in a project-level analysis. In the Draft Guidance Document, the SCAQMD provided numerical thresholds that can be applied to smaller projects (like the proposed project). Although the interim GHG significance threshold is 3,000 metric tons (MT) per year of carbon dioxide equivalents (CO_2e) for residential and commercial land uses. If emissions exceed the numerical screening threshold, a more detailed review of the project's GHG emissions is warranted. The SCAQMD has not addressed emission thresholds for construction; however, the SCAQMD requires quantification and disclosure.

This section discusses the proposed project's impacts related to the release of GHG emissions for the construction and operational phases of the project. Construction and operational GHG emissions were estimated using CalEEMod using the same methodology for the criteria pollutants described in Section 4.3, Air Quality.

Construction Activities. Construction activities associated with the proposed project would produce combustion emissions from various sources. During construction, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically use fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO_2, CH_4, and N_2O. Furthermore, CH_4 is emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

SCAQMD does not provide a separate GHG significance threshold for construction emissions; rather, applicable guidance specifies that construction emissions should be amortized over 30 years (a typical project lifetime), added to the project operational emissions, and that total compared to the GHG significance threshold. As shown in Table 4.E, the construction emissions associated with the proposed project would be approximately 453.7 MT CO_2e per year. Based on the 30-year lifespan of the proposed project, the proposed project would result in GHG emissions of approximately 15.1 MT CO_2e per year (see the CalEEMod output in Appendix A for details[28]).

Table 4.E: Construction Greenhouse Gas Emissions

Construction Year	Total Emissions per Year (MT)			Total Emissions per Year (MT CO_2e)
	CO_2	CH_4	N_2O	
2025	26.8	<1.0	<1.0	30.3
2026	233.0	<1.0	<1.0	234.4
2027	183.5	<1.0	<1.0	189.0
Total Emissions for the Entire Construction Process				**453.7**
Total Construction Emissions Amortized over 30 Years				**15.1**

Source: Compiled by LSA (January 2025).
CH_4 = methane
CO_2 = carbon dioxide
CO_2e = carbon dioxide equivalent
MT CO_2e = metric tons of carbon dioxide equivalent
MT = metric tons
N_2O = nitrous oxide

Since there is no separate GHG significance threshold for construction emissions, project-level and cumulative GHG emissions during construction activities alone would be less than significant, and no mitigation is required.

Operational GHG Emissions. Long-term GHG emissions are typically generated from mobile sources (e.g., cars, trucks, and buses), area sources (e.g., maintenance activities and landscaping), indirect emissions from sources associated with energy consumption, waste sources (land filling and waste disposal), and water sources (water supply and conveyance, treatment, and distribution). Mobile-source GHG emissions would include project-generated vehicle and truck trips to and from the area of project improvements. Area-source emissions would be associated with activities such as landscaping and maintenance within the area of project improvements. Waste-source emissions are typically created by the energy generated by land filling and other methods of disposal related to transporting and managing project-generated waste.

As discussed in Section 4.3, Air Quality, the proposed project would replace the two existing 750,000-gallon water tanks with two new 1 million-gallon water tanks, demolish the existing nonpotable water pumphouse, and replace piping, valving, and appurtenances. The proposed project would continue to meet the current demands of the Metropolitan State Hospital facilities. Although capacity could be increased based on the size of the new tanks, the proposed project would not increase water demand and would not result in any increased water pumping when compared to existing conditions. Additionally, the proposed project does not include new

[28] LSA Associates, Inc. 2025. CalEEMod Output Sheets. January. Appendix A.

pumps or associated pump equipment that would result in stationary-source emissions or additional energy consumption. Moreover, the existing pumps are required to comply with rules and regulations established by the SCAQMD for stationary sources, including Regulation IX, Source Specific Standards, and Regulation X, National Emission Standards for Hazardous Air Pollutants. Upon completion of construction activities, operation and maintenance associated with the proposed project would remain the same as currently occurs for the existing water tanks. As described in Section 4.17, Transportation, no additional trips are anticipated due to implementation of the proposed project. As such, the proposed project would not result in a significant increase in the generation of vehicle trips or VMT that would increase GHG emissions. The proposed project would not be a substantial source of energy, area-source, waste-source, or water-source emissions. Therefore, the proposed project would not generate GHG emissions that would have a significant impact on the environment. Impacts would be less than significant, and no mitigation is required.

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

Less Than Significant. Executive Order (EO) B-30-15 added the immediate target of reducing GHG emissions to 40 percent below 1990 levels by 2030. CARB released a second update to the Scoping Plan, the 2017 Scoping Plan, to reflect the 2030 target set by EO B-30-15 and codified by Senate Bill (SB) 32. SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emissions reductions target of at least 40 percent below 1990 levels by 2030 contained in EO B-30-15. The companion bill to SB 32, Assembly Bill (AB) 197, provides additional direction to CARB related to the adoption of strategies to reduce GHG emissions. Additional direction in AB 197 intended to provide easier public access to air emissions data collected by CARB was posted in December 2016.

In addition, the 2022 Scoping Plan assesses progress toward the statutory 2030 target while laying out a path to achieving carbon neutrality no later than 2045. The 2022 Scoping Plan focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

The Scoping Plan contains GHG reduction measures that work towards reducing GHG emissions, consistent with the targets set EO B-30-15 and codified by SB 32 and AB 197. The measures applicable to the proposed project include energy efficiency measures, water conservation and efficiency measures, and transportation and motor vehicle measures, as discussed below.

Energy efficiency measures are intended to maximize energy-efficient building and appliance standards; pursue additional efficiency efforts, including new technologies and new policy and implementation mechanisms; and pursue comparable investment in energy efficiency from all retail providers of electricity in California. In addition, these measures are designed to expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings. The proposed project would not result in additional energy consumption; therefore, the proposed project would not conflict with energy efficient measures.

Water conservation and efficiency measures are intended to continue efficiency programs and use cleaner energy sources to move and treat water. Increasing the efficiency of water transport and reducing water use would reduce GHG emissions. As noted above, the proposed project would continue to meet the current demands of the hospital facilities and would not result in any increased water pumping compared to existing conditions. Additionally, the proposed project does not include new pumps or associated pump equipment. The purpose of the proposed project is to replace the existing outdated water tanks on the hospital campus to meet current standards. Therefore, the proposed project would not conflict with any of the water conservation and efficiency measures.

The goal of transportation and motor vehicle measures is to develop regional GHG emissions reduction targets for passenger vehicles. As identified above, no additional trips are anticipated due to implementation of the proposed project. Therefore, the proposed project would not conflict with the identified transportation and motor vehicle measures.

The proposed project would result in a less than significant individual and cumulative impact related to GHG emissions. Therefore, the proposed project would not generate GHG emissions that would have a significant impact on the environment, nor would it conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Impacts would be less than significant, and no mitigation is required.

4.9 HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☒	☐	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

4.9.1 Impact Analysis

The analysis provided in this section is based on the *Hazardous Building Material Survey* (Ninyo & Moore, October 2024) provided in Appendix C.[29]

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

Less than Significant Impact with Mitigation Incorporated. Construction of the proposed project has the potential to create a hazard to the public or environment through the routine transportation, use, and disposal of construction-related hazardous materials such as fuels, oils, solvents, and other materials. Additionally, demolition of the existing structures on-site would involve disposal of lead-based materials (LBM) and asbestos-containing materials (ACM), as described in the *Hazardous Building Material Survey* prepared for the proposed project, which must be disposed of in accordance with the federal, State, and local regulations.

[29] Ninyo & Moore. 2024. *Hazardous Building Material Survey.* October. Appendix C.

Demolition/Construction. Potential hazardous materials such as fuel, paint products, lubricants, solvents, and cleaning products may be used and/or stored on site during construction of the proposed project. These materials are typical of materials delivered to construction sites. Due to the relatively small scale of the proposed project, only limited quantities of these materials are expected to be used during construction, and in limited quantities they are not considered hazardous to the public at large.

The transport, use, and storage of hazardous materials during construction would be regulated by the Los Angeles County Fire Department, the City of Norwalk Fire Department, and the California Occupational Safety and Health Administration (Cal/OSHA). Additionally, the United States Department of Transportation (USDOT) Office of Hazardous Materials Safety prescribes strict regulations for the safe transportation of hazardous materials by truck and rail on State highways and rail lines, as described in Title 49 of the Code of Federal Regulations and implemented by Title 13 of the California Code of Regulations.

The existing water tanks proposed for demolition were constructed in 1955 and circa 1960. Structures constructed prior to 1978 may contain LBM as well as ACM incorporated into various construction components, including paint, roof tiles, and thermal insulation. The *Hazardous Building Material Survey* prepared for the proposed project identified lead within several structures on site, including Tank #2, Valve Pit #2, and the potable water pumphouse. The proposed project would not result in impacts to Valve Pit #2 or the potable water pumphouse. Therefore, Mitigation Measure (MM) HAZ-1 would be implemented prior to demolition of Tank #2 to remove LBM. Additionally, ACM were identified within Tank #1. Therefore, MM HAZ-2 would be implemented prior to demolition of Tank #1 to remove ACM. In accordance with State and federal requirements, universal wastes discussed in the *Hazardous Building Material Survey,* such as light bulbs and light ballasts, exit signs, transformers, etc., that are removed from the project site during construction of the proposed project shall be properly disposed of.

With implementation of MMs HAZ-1 and HAZ-2, hazards to the public and the environment from demolition of structures containing lead and/or asbestos would be reduced to less than significant levels with mitigation incorporated.

Operation. The proposed project includes replacement of the two existing 750,000-gallon water tanks with two new 1 million-gallon water tanks, demolition of the existing nonpotable water pumphouse, and replacement of piping, valving, and appurtenances. Operation of the proposed project would not emit hazardous emissions or involve/generate hazardous or acutely hazardous materials, substances, or waste. However, the proposed project could involve the use of materials associated with routine maintenance of the property, such as janitorial supplies for cleaning purposes and/or herbicides and pesticides for landscaping. These uses would not involve the routine transport, use, or disposal of quantities of hazardous materials that could create a significant hazard to the public or environment.

As is the case during construction, the transport, use, and storage of hazardous materials during project occupation would be regulated by the Los Angeles County Fire Department, the City Fire Department, and Cal/OSHA. Additionally, transport of hazardous materials by truck and rail on

State highways and rail lines would be regulated by the USDOT Office of Hazardous Materials Safety as described above.

These regulations inherently safeguard life and property from the hazards of fire/explosion arising from the storage, handling, and use of hazardous substances, materials, and devices, as well as hazardous conditions due to the use or occupancy of buildings. With implementation of MMs HAZ-1 and HAZ-2 during demolition of the existing structures on site and compliance with all applicable federal, State, and local laws during construction and operation of the proposed project, impacts to the public or environment from the routine transportation, use, and disposal of hazardous materials would be less than significant with mitigation incorporated.

Mitigation Measures:

MM HAZ-1 **Lead Removal.** Prior to demolition and/or removal of Tank #2, all lead-based materials (LBM) shall be removed in accordance with the California Department of Occupational Safety and Health (DOSH) Lead in Construction Standard, California Code of Regulations Title 8, Section 1532.1. Once removed, LBM shall be disposed of in accordance with the requirements outlined in the *Hazardous Building Material Survey* (Ninyo & Moore, October 2024).

MM HAZ-2 **Asbestos Removal.** Prior to demolition and/or removal of Tank #1, all asbestos-containing materials (ACM) shall be removed by a licensed abatement removal contractor approved by the City of Norwalk. ACM abatement monitoring and removal shall be performed in accordance with the specifications outlined in the *Hazardous Building Material Survey* (Ninyo & Moore, October 2024).

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

Less Than Significant Impact. Exposure to hazardous materials during the construction and operation of the proposed project could result from (1) the improper handling or use of hazardous substances; (2) a transportation accident; or (3) inadvertent release resulting from an unforeseen event (e.g., fire, flood, or earthquake).

The proposed project would involve construction activities, including removal of existing foundations, grading, and site preparation. During construction activities, the DSH would be required to comply with relevant applicable federal and State laws and regulations pertaining to hazardous materials. The potential for the release of hazardous materials during project construction is low, and even if a release were to occur, it would not result in a significant hazard to the public, surrounding land uses, or environment due to the small quantities of these materials that would be used during construction activities.

The proposed project involves the replacement of two existing water tanks and associated infrastructure on site and therefore would not change the existing use of the project site. The potential for releasing hazardous materials into the environment during project operation would be

consistent with existing conditions and would not be exacerbated by implementation of the proposed project. Therefore, operation of the proposed project would not result in a significant impact associated with hazards from reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and no mitigation is required.

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

No Impact. The nearest school to the project site is Paddison Elementary School, located approximately 0.4 mile west of the project site along Crewe Street. As described above, the proposed project would not result in a significant hazard affecting the public during project construction or operation. Furthermore, operation of the proposed project would not result in significant impacts associated with hazardous materials because all materials would be handled, stored, and disposed of in accordance with applicable standards and regulations. Therefore, because the proposed project would not involve activities that would result in the emissions of hazardous materials or acutely hazardous substances within 0.25 mile of a school, no impacts would occur and no mitigation is required.

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

No Impact. According to the California Department of Toxic Substances Control (DTSC) EnviroStor database, the project site is not located on a federal superfund site, State response site, voluntary cleanup site, school cleanup site, corrective action site, or tiered permit site.[30] Review of the State Water Resources Control Board (SWRCB) GeoTracker database confirms that the project site is not on a Leaking Underground Storage Tank (LUST) Cleanup site.[31] There are 13 LUST sites within 0.5 mile of the project site; however, only one site is within 0.25 mile of the project site. The 13 sites are classified as "case-closed" and do not appear to represent an environmental concern to the project site. The project site is not located on a list of solid waste disposal sites identified by the SWRCB with waste constituents above hazardous waste levels outside the waste management unit[32] or active cease-and-desist orders or cleanup-and-abatement orders.[33] All use, storage, transport, and disposal of hazardous materials (including any small amounts of hazardous wastes) during construction and operation of the proposed project would be performed in accordance with existing State and federal hazardous materials regulations. Because the project site is not listed on the DTSC

30 California Department of Toxic Substances Control (DTSC). n.d. EnviroStor Database. Website: https://www.envirostor.dtsc.ca.gov/public/map/?global_id=19970011 (accessed October 18, 2024).

31 State Water Resources Control Board (SWRCB). n.d. GeoTracker database. Website: https://geotracker.waterboards.ca.gov/map/ (accessed October 18, 2024).

32 California Environmental Protection Agency (CalEPA). n.d.-b. Sites Identified with Waste Constituents above Hazardous Waste Levels Outside the Waste Management Unit. Website: https://calepa.ca.gov/wp-content/uploads/sites/6/2016/10/SiteCleanup-CorteseList-CurrentList.pdf (accessed October 18, 2024).

33 California Environmental Protection Agency (CalEPA). n.d.-a. Cortese List Data Resources. Website: https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5a/ (accessed October 18, 2024).

Hazardous Waste and Substances Site List (Cortese List, compiled pursuant to Section 65962.5 of the Government Code),[34] no impacts would occur and no mitigation is required.

e. Would the project be located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The airport closest to the project site is Fullerton Municipal Airport, located approximately 6 miles southeast of the project site. The proposed project is not within an airport land use plan or within 2 miles of a public airport or public use airport and therefore would not result in impacts to safety or excessive noise for people residing or working in the project area. No mitigation is required.

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

No Impact. The City adopted a Local Hazard Mitigation Plan in February 2022, which reduces risks from disasters to the people, property, economy, and environment within Norwalk.[35] Additionally, the DSH Metropolitan has an Emergency Management Program and Emergency Operations Plan (DSH 2025). The proposed project is located within the Metropolitan State Hospital campus and would not require traffic detours or road closures on public roadways. The City's General Plan and Local Hazard Mitigation Plan do not designate evacuation routes within Norwalk. However, the County of Los Angeles Public Works Department designates Imperial Highway, located approximately 0.25 mile south of the project site, as a disaster route.[36] The proposed project would not involve any work or other disruption on Imperial Highway.

The proposed project includes replacement of the two existing 750,000-gallon water tanks with two new 1 million-gallon water tanks, demolition of the existing nonpotable water pumphouse, and replacement of piping, valving, and appurtenances. The proposed project would not change the existing use of the project site. Operation of the proposed project would not result in a change in traffic volumes or access to the project site and would not interfere with existing emergency response times or adopted emergency response or evacuation plans. Therefore, the proposed project would not result in impacts related to impairment or interference with an adopted emergency response or evacuation plan, and no mitigation is required.

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34 California Environmental Protection Agency (CalEPA). n.d.-a. Cortese List Data Resources. Website: https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5a/ (accessed October 18, 2024).

35 City of Norwalk. 2022. Local Hazard Mitigation Plan. Website: https://cms3.revize.com/revize/norwalkca/Documents/Departments%20&%20Services/Public%20Safety/Emergency%20Management/Plans/LHMP2022%20(1).pdf (accessed October 18, 2024).

36 County of Los Angeles Department of Public Works. 2008. City of Norwalk Disaster Route Maps. Website: https://pw.lacounty.gov/dsg/disasterroutes/map/Norwalk.pdf (accessed September 11, 2024).

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

No Impact. The project site is fully developed and located in an urbanized area. According to CAL FIRE, the area is not within an SRA and is located within a Non-VHFHSZ within an LRA.[37,38] The proposed project includes replacement of the two existing 750,000-gallon water tanks with two new 1 million-gallon water tanks, demolition of the existing nonpotable water pumphouse, and replacement of piping, valving, and appurtenances. Implementation of the proposed project would not introduce any people or more structures to the project site compared to existing conditions, would not change the existing use of the project site, and would not alter the existing risk of wildfire on the project site. The existing water tanks are being replaced to address safety issues and meet current standards. The replacement of Tank #2 would provide dedicated fire-related water storage, which is not currently available on the Metropolitan State Hospital campus (existing Tank #2 is not currently in use). The availability of 1 million gallons of water for fire suppression needs would benefit and aid fire protection services at the Metropolitan State Hospital campus. Therefore, implementation of the proposed project would not result in impacts related to exposure of people or structures to a significant risk of loss, injury, or death from wildland fires and no mitigation is required.

[37] California Department of Forestry and Fire Protection (CAL FIRE). 2023. Fire Hazard Severity Zones in State Responsibility Area. Website: https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones (accessed September 11, 2024).

[38] California Department of Forestry and Fire Protection (CAL FIRE). 2011. Very High Fire Hazard Severity Zones in LRA. Website: https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/osfm-website/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones/fire-hazard-severity-zones-map/upload-4/losangelescounty.pdf (accessed September 11, 2011).

4.10 HYDROLOGY AND WATER QUALITY

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

Proposed project construction and operation would not result in impacts to related to hydrology and water quality. No analysis is required. Refer to Section 3.0, Environmental Factors Potentially Affected, including Section 3.1, Determination, for a more detailed discussion of the proposed project and hydrology and water quality.

4.11 LAND USE AND PLANNING

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

Proposed project construction and operation would not result in impacts related to land use and planning. No analysis is required. Refer to Section 3.0, Environmental Factors Potentially Affected, including Section 3.1, Determination, for a more detailed discussion of the proposed project and land use and planning.

4.12 MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Proposed project construction and operation would not result in impacts to mineral resources. No analysis is required. Refer to Section 3.0, Environmental Factors Potentially Affected, including Section 3.1, Determination, for a more detailed discussion of the proposed project and mineral resources.

4.13 NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

The following provides an overview of the characteristics of sound and vibration as well as the regulatory framework that applies to noise in the vicinity of the project site. The existing noise environment in and around the project site is also described.

Characteristics of Sound. Noise is usually defined as unwanted sound. Noise consists of any sound that may produce physiological or psychological damage and/or interfere with communication, work, rest, recreation, or sleep.

Several noise measurement scales exist that are used to describe noise in a particular location. A decibel (dB) is a unit of measurement that indicates the relative intensity of a sound. Sound levels in dB are calculated on a logarithmic basis. An increase of 10 dB represents a tenfold increase in acoustic energy, while 20 dB is 100 times more intense, and 30 dB is 1,000 times more intense. Each 10 dB increase in sound level is perceived as approximately a doubling of loudness; similarly, each 10 dB decrease in sound level is perceived as half as loud.

Sound intensity is normally measured through the A-weighted sound level (dBA). This scale gives greater weight to the frequencies of sound to which the human ear is most sensitive. The A-weighted sound level is the basis for 24-hour sound measurements that better represent human sensitivity to sound at night. As noise spreads from a source, it loses energy so that the farther away the noise receiver is from the noise source, the lower the perceived noise level would be. Geometric spreading causes the sound level to attenuate or be reduced, resulting in a 6 dB reduction in the noise level for each doubling of distance from a single point source of noise to the noise-sensitive receptor of concern.

There are many ways to rate noise for various time periods, but an appropriate rating of ambient noise affecting humans also accounts for the annoying effects of sound. Equivalent continuous sound level (L_{eq}) is the total sound energy of time-varying noise over a sample period. However, the predominant rating scales for human communities in the State of California are the L_{eq}, the community noise equivalent level (CNEL), and the day-night average level (L_{dn}) based on dBA. L_{dn},

sometimes denoted as DNL, represents the time-varying noise over a 24-hour period, with a 10 dBA weighting factor applied to noise occurring from 10:00 p.m. to 7:00 a.m. (defined as sleeping hours). L_{dn} is similar to the CNEL scale, but without the adjustment for events occurring during the evening relaxation hours of 7:00 p.m. to 10:00 p.m.

Characteristics of Vibration. Vibration refers to ground-borne noise and perceptible motion. Ground-borne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors, where the motion may not be discernible. Typically, there is more adverse reaction to effects associated with the shaking of a building. Vibration energy propagates from a source through intervening soil and rock layers to the foundations of nearby buildings. The vibration then propagates from the foundation throughout the remainder of the structure. Building vibration may be perceived by occupants as the motion of building surfaces, the rattling of items on shelves or hanging on walls, or a low-frequency rumbling noise. The rumbling noise is caused by the vibration of walls, floors, and ceilings that radiate sound waves. Annoyance from vibration often occurs when the vibration exceeds the threshold of perception by 10 dB or less. This is an order of magnitude below the damage threshold for normal buildings.

Typical sources of ground-borne vibration are construction activities (e.g., blasting, pile driving, and operating heavy-duty earthmoving equipment), steel-wheeled trains, and occasional traffic on rough roads. Problems with both ground-borne vibration and noise from these sources are usually localized to areas within approximately 100 feet from the vibration source, although there are examples of ground-borne vibration causing interference out to distances greater than 200 feet.[39] When roadways are smooth, vibration from traffic, even heavy trucks, is rarely perceptible. It is assumed for most projects that the roadway surface will be smooth enough that ground-borne vibration from street traffic will not exceed the impact criteria; however, the construction of the project could result in ground-borne vibration that may be damaging.

Ground-borne vibration has the potential to damage buildings. Although it is very rare for typical construction activities to cause even cosmetic building damage, it is not uncommon for construction processes such as blasting and pile driving to cause vibration of sufficient amplitudes to damage nearby buildings. Ground-borne vibration is usually measured in terms of vibration velocity, either the root-mean-square (RMS) velocity or peak particle velocity (PPV). The PPV is used to characterize potential for damage.

Regulatory Framework. A project would have a significant noise effect if it would substantially increase the ambient noise levels for adjoining areas or conflict with the adopted environmental plans and goals of applicable regulatory agencies. While the DSH is not required to comply with local criteria or standards, the City of Norwalk's noise level standards are used for CEQA impact determination. The following analysis compares the potential impacts of the proposed project to the criteria within the City's Municipal Code. Because the City's Municipal Code does not provide vibration assessment criteria for damage related to construction, the guidelines within the Federal

[39] California Department of Transportation (Caltrans). 2013. *Caltrans Transportation and Construction Vibration Guidance Manual*. September.

Transit Administration's (FTA) Transit Noise and Vibration Impact Assessment Manual (FTA Manual)[40] have been used.

City of Norwalk Municipal Code. The City of Norwalk Municipal Code (Chapter 9.04, Article III, Noise)[41] sets allowable hours for construction activity to between the hours of 7:00 a.m. and 6:00 p.m. or sunset, whichever is later.

Because the City's Municipal Code does not establish construction noise thresholds, for the purposes of analyzing significance under CEQA, the FTA's criteria[42] are used. The general assessment criteria for construction noise identify a 1-hour noise level of 90 dBA L_{eq} for residential uses during daytime hours. This provides reasonable criteria for assessing construction noise impacts based on the potential for adverse community reaction when the noise criteria are exceeded.

Additionally, the City's Municipal Code does not provide specific noise level requirements or vibration impact criteria associated with construction activities; therefore, the FTA criteria will be used in this analysis.

Federal Transit Administration. The criteria for environmental impacts resulting from ground-borne vibration are based on the maximum levels for a single event. The guidelines within the FTA Manual have been used to determine vibration impacts (refer to Table 4.F, below).

Table 4.F: Construction Vibration Damage Criteria

Building Category	PPV (in/sec)
Reinforced concrete, steel, or timber (no plaster)	0.50
Engineered concrete and masonry (no plaster)	0.30
Non-engineered timber and masonry buildings	0.20
Buildings extremely susceptible to vibration damage	0.12

Source: *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018), Table 12-3.
FTA = Federal Transit Administration PPV = peak particle velocity
in/sec = inches per second

The FTA Manual guidelines show that a vibration level of up to 0.2 inch/second (in/sec) PPV is considered safe for non-engineered timber and masonry buildings and would not result in any construction vibration damage. Therefore, in order to be conservative, the 0.2 in/sec PPV threshold has been used when evaluating vibration impacts at the nearest structures to the project site.

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40 Federal Transit Administration (FTA). 2018. *Transit Noise and Vibration Impact Assessment Manual*. FTA Report No. 0123. September.

41 City of Norwalk. 2023. Municipal Code. Website: https://ecode360.com/NO4978/home (accessed January 2025).

42 Federal Transit Administration (FTA). 2018. *Transit Noise and Vibration Impact Assessment Manual*. September.

Thresholds of Significance. A project would normally have a significant effect on the environment related to noise and vibration if it would substantially increase the ambient noise levels for adjoining areas or conflict with the adopted environmental plans and the goals of the community in which the project is located. The applicable noise standards governing the project site are the criteria in the City's Noise Ordinance and the 2018 FTA Manual.[43]

Sensitive Land Uses in the Vicinity. Certain land uses are considered more sensitive to noise than others. Examples of these include residential areas, educational facilities, hospitals, childcare facilities, and senior housing. The closest sensitive receptors to the project site are existing single-family residences opposite Balsam Street located approximately 75 feet west of the project site boundary line.

4.13.1 Impact Analysis

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

Less than Significant Impact.

Construction Noise Impacts. Construction-related noise levels would be higher than existing ambient noise levels at the project site today but would no longer occur once construction of the proposed project is completed.

Two types of potential short-term noise impacts could occur during construction of the proposed project: (1) noise impacts related to construction crew commutes and the transport of construction equipment and materials to the area of project improvements; and (2) noise impacts associated with demolition, site preparation, grading, and construction.

Construction crew commutes and the transport of construction equipment and materials to the project site would result in a maximum of 87 acoustically equivalent vehicle trips per day during the phase with the highest construction activity (demolition phase), which would incrementally increase noise levels on access roads leading to the project site. Although there would be a relatively high single-event noise exposure from heavy trucks, potentially causing intermittent noise nuisance (passing pickup trucks at 50 feet would generate up to a maximum of 75 dBA), the effect on longer-term (hourly or daily) ambient noise levels would be minor (i.e., less than 3 dBA) given that the traffic volume increase on adjacent roadways is at most 87 trips. Therefore, construction-related impacts associated with worker commutes and equipment transport to the project site would be less than significant.

The second type of potential short-term noise impact is related to noise generated during demolition, site preparation, grading, and construction. Construction is completed in discrete steps, each of which has its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise

[43] Federal Transit Administration (FTA). 2018. *Transit Noise and Vibration Impact Assessment Manual*. FTA Report No. 0123. September.

generated on the project site and, therefore, the noise levels surrounding the project site as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full-power operation followed by 3 or 4 minutes at lower power settings.

Once the composite reference maximum noise level is calculated for each phase, the usage factor provided in Table 4.G is utilized to calculate the hourly noise level impact for each piece of equipment based on the following equation:

$$L_{eq}(equip) = E.L. + 10\log(U.F.) - 20\log\left(\frac{D}{50}\right)$$

where: $L_{eq}(equip)$ = L_{eq} at a receiver resulting from the operation of a single piece of equipment over a specified time period

E.L. = noise emission level of the particular piece of equipment at a reference distance of 50 feet

U.F. = usage factor that accounts for the fraction of time that the equipment is in use over the specified period of time

D = distance from the receiver to the piece of equipment

Table 4.G: Typical Maximum Construction Equipment Noise Levels (L_{max})

Type of Equipment	Acoustical Usage Factor	Suggested Maximum Sound Levels for Analysis (dBA L_{max} at 50 ft)
Air Compressor	40	80
Backhoe	40	80
Cement Mixer	40	85
Concrete/Industrial Saw	20	90
Crane	16	85
Excavator	40	85
Generator	50	82
Grader	40	85
Loader	40	80
Paver	50	85
Roller	20	85
Rubber Tire Dozer	40	85
Scraper	40	85
Tractor	40	84
Truck	40	84
Welder	40	73

Source: Roadway Construction Noise Model (FHWA 2006).
dBA = A-weighted decibels
ft = feet
L_{max} = maximum noise level

Each piece of construction equipment operates as an individual point source. Utilizing the following equation, a composite noise level can be calculated when multiple sources of noise operate simultaneously:

$$Leq\ (composite) = 10 * \log_{10}\left(\sum_{1}^{n} 10^{\frac{Ln}{10}}\right)$$

Utilizing the equations from the methodology above and the reference information in Tables 4.13.B and 4.13.C, the composite noise level would be 87 dBA L_{eq} at a distance of 50 feet from the construction area. Table 4.H, below, provides a summary of the reference noise levels during construction by phase.

Table 4.H: Noise Levels By Construction Phase

Phase	Composite Reference Level at 50 ft	
	dBA L_{max}	dBA L_{eq}
Demolition	91	87
Site Preparation	89	85
Grading	89	86
Building Construction	87	83
Paving	89	85
Architectural Coating	78	74

Source: Compiled by LSA (2025).
dBA = A-weighted decibel
ft = feet
L_{eq} = equivalent continuous sound level
L_{max} = maximum noise level

The nearest sensitive receptor would be the single-family homes located within approximately 150 feet from the center of the project site. It is expected that noise levels during construction at the nearest residences would approach 77 dBA L_{eq}. All other sensitive receptors are farther from areas of construction and would therefore experience lower noise levels.

While construction-related, short-term noise levels have the potential to be higher than existing ambient noise levels, the noise impacts would no longer occur once project construction is completed. Furthermore, construction-related noise impacts at the nearest sensitive receptors would remain below the 90 dBA L_{eq} 1-hour construction noise level criteria established by the FTA.[44]

Compliance with the City's Noise Ordinance would ensure that construction noise does not disturb the residential uses during hours when ambient noise levels are likely to be lower (i.e., at night). RCM NOI-1 would limit construction hours and require the implementation of noise-

[44] Federal Transit Administration (FTA). 2018. *Transit Noise and Vibration Impact Assessment Manual*. FTA Report No. 0123. September.

reducing measures during construction. Therefore, with implementation of RCM NOI-1, construction activity noise impacts would be less than significant.

Regulatory Compliance Measures:

RCM NOI-1 **Construction Noise.** During construction, the construction contractor shall implement the following best business practices:

- Construction activities occurring as part of the project shall be subject to the limitations and requirements of the City of Norwalk Municipal Code, which states that construction activities are prohibited between the hours of 6:00 p.m. or sunset, whichever is later, and 7:00 a.m.
- During all project area excavation and on-site grading, the project contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers consistent with manufacturers' standards.
- To the best extent possible, the project contractor shall place all stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the project area.
- Construction staging areas shall be located as far from sensitive receptors as possible during all phases of construction.

Operational Noise Impacts. The proposed project includes replacement of the two existing 750,000-gallon water tanks with two new 1 million-gallon water tanks, demolition of the existing nonpotable water pumphouse, and replacement of piping, valving, and appurtenances. None of the associated improvements are expected to generate noise. Once construction activities are complete, staging areas would be returned to existing conditions. Thus, no operational noise would be associated with the new water storage tanks. The proposed project would not result in a permanent increase in ambient noise levels in the vicinity of the proposed project and no mitigation is required.

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

Less than Significant Impact. Construction of the proposed project could result in the generation of groundborne vibration. This construction vibration impact analysis assesses the potential for building damages using vibration levels in PPV (in/sec). The FTA Manual guidelines indicate that a vibration level up to 0.2 in/sec PPV is considered safe for non-engineered timber and masonry buildings.

Table 4.I shows the PPV values at 25 feet from a construction vibration source. As shown in Table 4.I, bulldozers and other heavy-tracked construction equipment (except for vibratory rollers) generate approximately 0.089 in/sec PPV of groundborne vibration when measured at 25 feet.

Table 4.I: Vibration Source Amplitudes for Construction Equipment

Equipment	Reference PPV (in/sec) at 25 feet
Vibratory Roller	0.210
Hoe Ram	0.089
Large Bulldozer	0.089
Caisson Drilling	0.089
Loaded Trucks	0.076
Jackhammer	0.035
Small Bulldozer	0.003

Sources: *Transit Noise and Vibration Impact Assessment* (FTA 2018).
in/sec = inches per second
PPV = peak particle velocity

Construction vibration, similar to vibration from other sources, would not have any significant effects on outdoor activities (e.g., those outside of residential buildings in the project vicinity). The proposed project is expected to include the use of heavy equipment similar to a large bulldozer. The distance to the nearest buildings for vibration impact analysis is measured between the nearest off-site buildings and the project disturbance areas because vibration impacts occur normally within the buildings. The formula for vibration transmission is provided below.

$$PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$$

As identified above, residential structures are located 75 feet from the boundary of proposed construction activities and would experience vibration levels approaching 0.017 in/sec PPV, which would not exceed the FTA threshold of 0.2 in/sec PPV. Therefore, construction of the proposed project would not result in generation of excessive groundborne vibration or groundborne noise levels.

The proposed project is a water tank replacement project, and implementation of the proposed project would not generate additional vehicular traffic or other potential sources of groundborne vibration. Operation of the proposed project would not generate excessive groundborne vibration or groundborne noise levels. Impacts would be less than significant, and no mitigation is required.

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 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The proposed project is not within 2 miles of a public or public-use airport. Fullerton Municipal Airport (FUL) is the closest airport use, located approximately 6 miles southeast of the proposed project. Because the proposed project is not within the 65 dBA CNEL and 60 dBA CNEL noise contours, no further analysis associated with aircraft noise impacts is necessary. Additionally, there are no helipads or private airstrips within 2 miles of the project area. Therefore, the proposed project would not result in the exposure of people residing or working in the project area to excessive noise levels. No impact would occur, and no mitigation is required.

4.14 POPULATION AND HOUSING

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

4.14.1 Impact Analysis

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

Less than Significant Impact. The proposed project includes replacement of the two existing 750,000-gallon water tanks with two new 1 million-gallon water tanks, demolition of the existing nonpotable water pumphouse, and replacement of piping, valving, and appurtenances. The new tanks would be the same diameter as the existing tanks but taller. Because the new water tanks would be taller, they could provide increased capacity. However, the purpose of the proposed project is to replace the existing outdated water tanks with new water tanks that meet current standards. The proposed project would continue to meet the current demands of the hospital facilities and would not increase water demand or result in any increased water pumping compared to existing conditions. Additionally, the proposed project does not include development of new homes, businesses, or roads, and would not generate additional traffic upon completion. Therefore, the proposed project would not induce substantial unplanned population growth in the area either directly or indirectly. Impacts would be less than significant and no mitigation is required.

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

No Impact. The proposed project consists of replacing the existing water tanks at the hospital campus and would not displace people or housing or necessitate the construction of replacement housing. No impact would occur, and no mitigation is required.

4.15 PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire protection?	☐	☐	☐	☒
ii. Police protection?	☐	☐	☐	☒
iii. Schools?	☐	☐	☐	☒
iv. Parks?	☐	☐	☐	☒
v. Other public facilities?	☐	☐	☐	☒

Proposed project construction and operation would not result in impacts to public service. No analysis is required. Refer to Section 3.0, Environmental Factors Potentially Affected, including Section 3.1, Determination, for a more detailed discussion of the proposed project and public services.

4.16 RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Proposed project construction and operation would not result in impacts related to recreation. No analysis is required. Refer to Section 3.0, Environmental Factors Potentially Affected, including Section 3.1, Determination, for a more detailed discussion of the proposed project and recreation.

4.17 TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b. Conflict or be inconsistent with CEQA Guidelines §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?	☐	☐	☒	☐

Regional vehicular access to the project site is provided via I-5, located approximately 0.75 mile to the southwest, and SR-42, located approximately 1 mile to the southwest. Local access to the gated and secured Metropolitan State Hospital campus is provided via Bloomfield Avenue. However, direct access to the project site is provided via Balsam Street.

Bloomfield Avenue is a four-lane divided roadway on the east side of the project frontage providing signalized access to the Metropolitan State Hospital campus. On-street parking is prohibited on both (east and west) sides of the street. Bicycle lanes are provided on the east and west sides of the street. A pedestrian sidewalk is on the east side of the street. The posted speed limit is 40 miles per hour (mph). The City's General Plan Circulation Element identifies Bloomfield Avenue as a Major Highway. Balsam Street is an internal, undivided two-lane street within the Metropolitan State Hospital campus providing direct access to the project site.

4.17.1 Impact Analysis

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

Less Than Significant Impact. In order to assess the impact of the proposed project on the surrounding circulation system, LSA calculated the project trips that would be generated.

Project construction would temporarily generate traffic on the existing area roadway network. These temporary vehicle trips would include construction workers (up to 13 daily workers) traveling to the project site, as well as trucks (up to 5 daily trucks) associated with delivery of construction equipment and hauling of materials. Once grading is completed and building materials are delivered to the project site, all construction activities would occur within the project site and therefore would not disrupt off-site traffic flow. Due to the nature of the proposed improvements, a significant number of construction trips to/from the project site is not anticipated. No roadway or lane closures would occur and no off-site roadway improvements are proposed.

Due to the nature of the proposed improvements, the proposed project would not generate any operational traffic.

Based on the anticipated low trip generation for temporary project construction (and no trip generation once construction is complete), the proposed project is not anticipated to result in any level of service (LOS) or operational deficiencies to the surrounding circulation system.

The City's General Plan Circulation Element provides policy direction for the transportation system and links circulation strategies with those of population growth, environmental quality, and economic well-being. The Circulation Element establishes key goals, policies, programs, and requirements for achieving a transportation system that balances the needs of all road users. The proposed project would not generate a substantial number of temporary construction trips or any operational trips to warrant modifications to any transportation facilities. Therefore, the proposed project would not conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant, and no mitigation is required.

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

Less Than Significant Impact. *State CEQA Guidelines* Section 15064.3 codifies the change from LOS to VMT as a metric for transportation impact analysis. Under SB 743, VMT analysis is the primary method for determining CEQA impacts. Jurisdictions were not required to adopt VMT as a significant impact determination until July 1, 2020. The City has not prepared its own set of traffic study guidelines but uses recognized thresholds from Los Angeles County Public Works Transportation Impact Analysis Guidelines (County TIA Guidelines) to determine VMT impacts.

Therefore, the project's VMT analysis was based on the County TIA Guidelines as well as the Office of Planning and Research (OPR) Technical Advisory. The OPR Technical Advisory provide details on appropriate screening thresholds that can be used to identify when a proposed project is anticipated to result in a less than significant impact without conducting a more detail-level analysis.

The OPR Technical Advisory recommends VMT screening thresholds for smaller projects. The footnote on page 10 of the OPR Technical Advisory states the following:

> *Screening Thresholds for Small Projects*
>
> *Many local agencies have developed screening thresholds to indicate when detailed analysis is needed. Absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact.*

The OPR Technical Advisory recommends that a project generating fewer than 110 daily trips be screened out of a VMT analysis due to the presumption of a less than significant impact. The proposed project is estimated to generate fewer than 110 daily trips for temporary construction (up

to 13 workers and 5 trucks per day) and 0 daily trips once construction is complete. As such, a detailed VMT analysis is not required, and the proposed project is presumed to have a less than significant transportation impact. No mitigation is required.

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

No Impact. Bloomfield Avenue would provide direct access to the gated and secured Metropolitan State Hospital campus. However, access to the project site is provided via Balsam Street, which is an internal, undivided two-lane street within the Metropolitan State Hospital campus. The proposed project does not require any improvements to roadways and therefore would not result in any hazards due to geometric design features. Additionally, operation of the proposed project would not generate trips and therefore would not result in any hazards related to incompatible uses. Therefore, no impacts would occur and no mitigation is required.

d. Would the project result in inadequate emergency access?

Less Than Significant Impact. The proposed project would not require any improvements to Bloomfield Avenue or Balsam Street, as described above. All emergency access routes to the Metropolitan State Hospital campus, project site, and adjacent areas would be kept clear and unobstructed at all times. No roadway or lane closures are anticipated, and construction vehicles would not impede traffic flow on the surrounding public or internal circulation system. Therefore, the proposed project would not result in inadequate emergency access. Impacts would be less than significant, and no mitigation is required.

4.18 TRIBAL CULTURAL RESOURCES

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

4.18.1 Impact Analysis

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

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

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

Less Than Significant with Mitigation Incorporated. The term "California Native American tribe" is defined as "a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the Native American Heritage Commission (NAHC)."

Chapter 532, Statutes of 2014 (i.e., AB 52) requires lead agencies to evaluate a project's potential to affect "tribal cultural resources." Such resources include "sites, features, places, cultural landscapes,

sacred places, and objects with cultural value to a California Native American Tribe that are eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources." AB 52 also gives lead agencies the discretion to determine, supported by substantial evidence, whether a resource qualifies as a "tribal cultural resource."

CEQA defines a "historical resource" as a resource that meets one or more of the following criteria: (1) is listed in, or determined eligible for listing in, the California Register; (2) is listed in a local register of historical resources as defined in PRC Section 5020.1(k); (3) is identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); or (4) is determined to be a historical resource by a project's lead agency (PRC Section 21084.1 and *State CEQA Guidelines* Section 15064.5[a]).

"Local register of historical resources" means a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution.

A resource may be listed as a historical resource in the California Register if it meets any of the following National Register criteria, as defined in PRC Section 5024.1(C):

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

b) Is associated with the lives of persons important in our past.

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

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

A "substantial adverse change" to a historical resource, according to PRC Section 5020.1(q), "means demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired."

The *CEQA Guidelines* do not preclude identification of historical resources during the analysis of a project as defined in PRC Sections 5020.1(j) or 5024.1. Pursuant to *State CEQA Guidelines* Section 15064.5[c][4], if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment. It shall be sufficient that both the resource and the effect on it are noted in the IS, but they need not be considered further in the CEQA process.[45]

Per AB 52 (specifically California Public Resources Code 21080.3.1), Native American consultation is required upon request by interested California Native American tribes that have previously

[45] Pursuant to Section 21082.3(c) of the PRC, details on the nature, extent, and location of tribal cultural resources identified by Native American tribes shall remain confidential for the purposes of this analysis.

requested that the lead agency provide them with notice of such projects. On November 22, 2024, the DSH sent letters to interested Native American tribes for consultation under AB 52. One Native American Tribe, the Gabrieleño Band of Mission Indians-Kizh Nation (Kizh) responded to DSH's notification on December 9, 2024, requesting consultation. Tribal consultation was concluded on April 4, 2025.

As discussed in Section 4.5, Cultural Resources, Tanks #1 and #2 and associated infrastructure are not eligible for listing in the National Register or California Register or for designation as a California Historical Landmark. Additionally, these resources are not "historical resources" as defined by CEQA. There are also no known archaeological resources on the project site that would qualify as "historic resources" as defined by CEQA.

The project site has been previously disturbed by development of the existing water tanks, pumphouses, and infrastructure. The proposed project would require ground disturbance to replace the existing two tank foundations within the project site. The maximum depth of excavation during construction would be 2.5 feet. Because the proposed depth of excavation would not exceed the depth of excavation required for the previous development of the project site, and because the excavation would take place in existing fill and not native soils, the proposed project is not anticipated to result in impacts to tribal cultural resources or Native American human remains. Although the project site is not anticipated to be sensitive for tribal cultural resources, the proposed project would have the potential to impact tribal cultural resources or Native American human remains if discovered during project construction. Therefore, the proposed project would be required to implement Mitigation Measures (MM) TCR-1 through TCR-3, which requires retaining a Native American Monitor prior to commencement of ground-disturbing activities, procedures for the unanticipated discovery of tribal cultural resource objects and unanticipated discovery of human remains and associated funerary or ceremonial objects. Implementation of MMs TCR-1 through TCR-3, would ensure that tribal cultural resources and Native American human remains are protected if discovered during project construction. With implementation of MMs TCR-1 through TCR-3, impacts to tribal cultural resources would be less than significant.

Mitigation Measures:

MM TCR-1 Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.

A. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/ definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.

D. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

MM TCR-2 Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial).

Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

MM TCR-3 Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects.

A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.

B. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.

C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).

D. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.

E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

4.19 UTILITIES AND SERVICE SYSTEMS

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

4.19.1 Impact Analysis

Proposed project construction and operation would not result in impacts to utilities and service systems. No analysis is required. Refer to Section 3.0, Environmental Factors Potentially Affected, including Section 3.1, Determination, for a more detailed discussion of the proposed project and utilities and service systems.

4.20 WILDFIRE

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

Proposed project construction and operation would not result in impacts related to wildfire. No analysis is required. Refer to Section 3.0, Environmental Factors Potentially Affected, including Section 3.1, Determination, for a more detailed discussion of the proposed project and wildfire.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☐	☒	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

4.21.1 Impact Analysis

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

Less than Significant Impact. As discussed in Section 3.0 under Biological Resources, the project site does not contain suitable habitat for special-status species or federally protected wetlands, and it is not within an adopted HCP or NCCP. Although the proposed project would not require any vegetation/tree removal or tree trimming, ornamental trees located along the project site's west perimeter could provide suitable nesting habitat for nesting birds. To comply with the MBTA and California Fish and Game Code and avoid impacts to nesting birds from implementation of the proposed project, if construction commences during the nesting bird season (February 1 through August 31) a pre-construction nesting bird survey would be required prior to construction, as detailed in RCM BIO-1.

As discussed in Section 4.5, the proposed project is not expected to result in any significant impacts to any examples of the major periods of California history or prehistory. No historic cultural or archaeological resources as defined by CEQA were identified in the *Historical Significance Evaluation* (Appendix B) prepared for the proposed project. The project site has been previously disturbed by development of the existing water tanks, pumphouses, and infrastructure. The proposed project would require ground disturbance to replace the two existing tank foundations within the project site. The maximum depth of excavation during construction would be 2.5 feet. Because the

proposed depth of excavation would not exceed the depth of excavation required for the previous development of the project site, and because the excavation would take place in existing fill and not native soils, the proposed project is not anticipated to result in impacts to unknown archaeological or paleontological resources or human remains.

With implementation of RCM BIO-1, the potential for the proposed project to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of rare or endangered plants or animals, or eliminate important examples of the major periods of California history or prehistory would be less than significant, and no mitigation is required.

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

Less than Significant Impact. Section 15065(a)(3) of the *State CEQA Guidelines* states that a project's cumulative impacts are the possible environmental effects that may be cumulatively considerable when considered with other reasonably foreseeable projects. Cumulatively considerable impacts occur when the incremental effects of a particular project or program are significant when viewed in connection with the effects of other past, current, or reasonably foreseeable future projects. Section 15355 of the *State CEQA Guidelines* defines a cumulative impact as an impact that is created as a result of the combination of the project evaluated in the CEQA document together with other projects causing related impacts. The proposed project is located in a developed urban area, within a portion of the Metropolitan State Hospital campus. At this time, no other reasonably foreseeable projects have been identified for the Metropolitan State Hospital campus or within the immediate surroundings. While various projects within Norwalk have the potential to be under construction concurrent with the proposed project, concurrent projects within the city would be subject to regulations similar to those outlined in this document and would incorporate mitigation measures, as necessary, that would reduce impacts of the project. As shown in the discussion above, environmental impacts associated with the proposed project can be reduced to less than significant levels with the implementation of RCMs and/or project-specific MMs. All project-related impacts are localized and confined to the immediate project area. Given that the potential project-related impacts are less than significant and limited to the project site, implementation of the proposed project would not result in impacts that are cumulatively considerable when evaluated with the impacts of other current projects, or the effects of probable future projects. Therefore, cumulative impacts would be less than significant, and no mitigation is required.

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

Less than Significant Impact with Mitigation Incorporated. Based on the analysis provided throughout this IS/MND, with incorporation of RCMs and MMs, the proposed project would not result in any environmental effects that would cause substantial adverse effects on human beings,

either directly or indirectly. Potential impacts on human beings would be less than significant with mitigation incorporated.

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5.0 LIST OF PREPARERS

5.1 IS/MND PREPARERS

5.1.1 LSA

The following individuals were involved in the preparation of this Draft IS/MND:

- Pam Reading, Principal Environmental Planner
- Laurel Huntzinger, Associate, Project Manager
- Olivia Gastaldo, Environmental Planner
- Casey Tibbet, Associate, Architectural Historian
- J.T. Stephens, Principal, Noise and Vibration Group
- Moe Abushanab, Mechanical Noise Engineer
- Dean Arizabal, Principal, Transportation Group
- Jessica Coria, Director, Air Quality Group
- Amber Hazelrigg, Air Quality Specialist
- Bianca Martinez, Air Quality Specialist
- Jessica Quigley, GIS Specialist
- Jason Thomas, Graphics Technician

5.2 TECHNICAL REPORT PREPARERS

The following were involved in the preparation of the technical reports in support of this IS/MND. The nature of their involvement is summarized below.

5.2.1 LSA Associates, Inc.

The following individual was involved in the preparation of the *Historical Significance Evaluation* (December 2024):

- Casey Tibbet, Associate, Architectural Historian

5.2.2 Ninyo & Moore

The following individuals were involved in the preparation of the *Hazardous Building Material Survey* (October 2024):

- David Pacheco, CSST, LRC, Senior Staff Environmental Scientist
- David M. Kelly, CAC, CRIE, LRC, Senior Project Environmental Scientist
- Stephen J. Waide, CIH, CSP, CIEC, CMC, Principal Environmental Scientist

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