

Attachment A

Pure Water Los Angeles Program

Discussion of Environmental Effects

In accordance with Section 15126 of the CEQA Guidelines, the PEIR will assess the physical changes to the environment that will likely result from construction and operation of the proposed Program, including direct, indirect, cumulative, and growth-inducing effects. The PEIR will assess the significance of any adverse physical effects from facilities and activities associated with construction and operation of the Program components. The PEIR will be prepared in accordance with the CEQA-Plus requirements of the California State Water Resources Control Board, required for some federal funding partners to comply with the National Environmental Policy Act (NEPA). The majority of the Program components will be analyzed at a programmatic level (CEQA Guidelines Section 15168); other Program components with a sufficient amount of detail, such as Hyperion Modifications Phase 1A, at the time of the preparation of the PEIR will be analyzed at a project-level (CEQA Guidelines Section 15161). The PEIR will identify any feasible mitigation measures, if necessary to avoid or reduce any significant adverse effects of the Program. The PEIR will also assess a no-program alternative and will evaluate a reasonable range of feasible alternatives to the Program and its components, if such alternatives are needed to avoid or reduce any significant adverse effects of the Program. Consistent with CEQA Guidelines Section 15082(a)(1)(C), the potential adverse physical effects of the Program are summarized below, which in turn will be addressed in the PEIR.

Aesthetics

Although most of the Program components would be located belowground, some facilities such as upgrades at the Hyperion Water Reclamation Plant (Hyperion) new treatment facilities, pump stations, tanks, and power supply would be constructed aboveground. Therefore, some components of the Program would have the potential to conflict with applicable regulations governing scenic quality and/or alter the visual character of the Program component sites and their surroundings by converting existing land uses to water system facilities. The PEIR will evaluate the potential for the proposed Program to adversely affect aesthetic resources, including applicable regulations governing scenic quality and/or visual character and quality, scenic vistas, and new sources of light and glare.

Agriculture and Forestry Resources

The PEIR will assess whether the components of the proposed Program would adversely affect agriculture and forestry resources, including determining whether the Program components would be located on lands designated by the state's Farmland Mapping and Monitoring Program as Prime, Unique, or Important Farmland and if the Program sites would be located within agricultural preserves or under Williamson Act contracts. The PEIR will also assess whether the Program components would be located on lands designated as forest land.

Air Quality

Construction of Program components would generate emissions from construction equipment exhaust, earth movement, construction workers' commute, and material hauling. The PEIR will estimate construction-related emissions as well as long-term operational emissions of Program components, including new treatment technologies. The PEIR will evaluate the Program's consistency with the regional air quality attainment plans. In addition, the PEIR will evaluate potential health impacts associated with Program construction and operation emissions to local and regional sensitive receptors.

Biological Resources

The majority of Program surface components are anticipated to be located on and surrounded by disturbed areas or areas that contain ornamental vegetation in an urbanized area. Construction at Hyperion, and construction and operation of the proposed AWPFS, could affect biological resources in the urban, chaparral, coastal, and marine environment. The PEIR will inventory ecological values of affected areas and evaluate the potential for the Program to affect biological resources, such as sensitive species and critical habitats. The PEIR will evaluate the Program's consistency with applicable Habitat Conservation Plans, local ordinances, and state and federal regulations governing biological resources.

Cultural Resources

The PEIR will assess the potential effects of the Program on cultural resources. The PEIR will inventory archaeological, historic, and culturally sensitive resources and assess the potential for cultural resources to be adversely impacted during construction or operation of Program components, particularly during excavation below the topsoil for installation of Program facilities.

Energy

Construction and operation of the Program would result in the consumption of energy resources, especially to treat, pump, and convey water within the Program area. The PEIR will identify potential effects to local and regional energy supplies and capacity due to operation and construction of the new infrastructure. The PEIR will evaluate the energy efficiency of the proposed Program compared with energy demands of importing water to Los Angeles.

Geology and Soils

The Program site is located in a seismically active region. New Program facilities could directly or indirectly cause substantial adverse effects, including the risks of loss, injury, or death involving potential seismic hazards, such as rupture of a known earthquake fault, seismic ground shaking, or seismic-related ground failure, including liquefaction, landslides, substantial erosion or the loss of topsoil, lateral spreading, subsidence, collapse, and expansive soils. In addition, subsurface paleontological resources could be discovered during construction of Program components, particularly during excavation below the topsoil for installation of Program facilities. The PEIR will evaluate geologic hazards and identify impacts to known and potential paleontological resources in the region.

Greenhouse Gas Emissions

Construction activities would require use of equipment and vehicles that emit greenhouse gases (GHGs). Program facilities would use electric power and potentially other sources of energy, the generation or use of which produces GHGs. The PEIR will evaluate the GHGs associated with construction and operation of the proposed Program. PEIR will quantify GHG emissions associated with proposed construction and operation in terms of carbon dioxide equivalent (CO₂e) emissions and compare Program emissions to regional thresholds of significance. The analysis will consider the collective size of proposed facilities with respect to levels of CO₂e emissions and the energy efficiency parameters of the Program. The proposed Program's consistency with the County of Los Angeles Community Climate Action Plan (CCAP) and other applicable plans will also be discussed.

Hazards and Hazardous Materials

Construction of Program facilities would require excavation of the existing ground surface, which could uncover contaminated soils or hazardous substances that pose a substantial hazard to human health or the environment. Construction at Hyperion and operation of the proposed AWPf could include the transport, storage, and use of potentially hazardous materials. The PEIR will assess the potential for encountering hazardous materials during construction and operation. The PEIR will also assess the potential for the public or the environment to be affected by accidental release of hazardous materials due to construction and operation of Program components, including the potential for Program construction to be located within City-designated methane and methane buffer zones.

Groundwater

The PEIR will identify groundwater resources in the vicinity of the Program and will evaluate potential adverse and beneficial effects from construction and operation of Program components. The PEIR will summarize the potential impacts of injection and extraction facilities on groundwater levels, water quality, existing wells, and water rights. The PEIR will also assess the potential for proposed Program operations to affect the location of contamination plumes and groundwater quality within the Central, West Coast, and San Fernando Basins.

Hydrology and Water Quality

The PEIR will identify surface water resources in the vicinity of the Program and will evaluate potential adverse effects from construction and operation of Program components. Construction at Hyperion, construction and operation of the proposed AWPf could affect hydrology and water quality in the coastal, nearshore, and marine environment. The PEIR will include a program-level analysis of the effects associated with operation of Program components. The PEIR will describe the site-specific analysis that will be required once the locations for injection and wells, conveyance pipelines, and related facilities are ultimately determined. The PEIR will also describe site-specific analysis for the change in character of Hyperion discharges during construction and operation of the proposed AWPf. In addition, the PEIR will also describe potential effects associated with stormwater runoff and will assess whether construction and operation of the Program will meet regulatory requirements affecting stormwater and avoid significant adverse effects to receiving waters.

Land Use/Planning

The PEIR will identify designated land uses applicable to the Program components and will evaluate consistency of the proposed facilities with existing land uses within the affected area.

Mineral Resources

The PEIR will use the California Geologic Survey's guidelines and will consult the areas known as Mineral Resource Zones to determine if the proposed Program lies within a zone that contains mineral resources. The PEIR will describe and identify zones and summarize the relevant information from the state mandated Surface Mining and Reclamation Act of 1975 as part of the proposed Program's regulatory setting in relation to Mineral Resources. In addition, applicable general plans, municipal codes, and any other specific or land use plans will be reviewed to determine if they delineate any locally important mineral resources within the study area.

Noise and Vibration

Implementation of the Program would include temporary construction work and ongoing operations that generate noise and vibration that could affect nearby residents and other sensitive receptors. The PEIR will describe the local noise policies and ordinances for the jurisdictions within the Program area. The construction analysis will use established modeling methodology (e.g., the Federal Highway Administration Roadway Construction Noise Model and the Federal Transit Administration Noise and Vibration Manual). The PEIR will assess the significance of noise effects, including quantifying potential noise and vibration levels associated with equipment used to construct and operate the Program facilities in comparison to standards and thresholds established in local noise policies and ordinances.

Population and Housing

The proposed Program would not include the construction of new housing or businesses. As such, the Program would not directly induce population growth. However, the PEIR will analyze the Program's potential to induce indirect population growth due to the creation of new water supply sources.

Public Services

The proposed Program would construct new water facilities for advanced water purification, injection, extraction, and conveyance and is unlikely to affect demand for other public services or to require other new or expanded public facilities. Nevertheless, the PEIR will assess the potential for the Program to affect police and fire protection services, schools, and parks during construction and operation.

Recreation

The proposed Program would construct new water facilities for advanced water purification, injection, extraction, and conveyance and is unlikely to affect recreational resources. Nevertheless, the PEIR will identify existing recreational areas within the Program area and will analyze potential for indirect effects of construction and operation to existing local recreational resources.

Transportation

The proposed Program will temporarily add vehicle trips to local transportation corridors, including material haul trips and construction worker commutes. Additionally, installation of pipeline within local rights-of-way would require temporary road closures and cause potential disruption of traffic patterns. During Program operations, some additional personnel and additional truck deliveries may be required to operate the AWP. The PEIR will analyze whether the proposed Program will conflict with a program, plan, ordinance, or policy addressing the circulation system. The transportation analysis will be conducted using a uniform approach based on the City of Los Angeles Transportation Assessment Guidelines, County transportation assessment guidelines, and other applicable guidelines, including application of the project screening criteria and the Vehicle Miles Traveled (VMT) thresholds. The PEIR will evaluate the effect of the Program on traffic and circulation in the vicinity of the Program site and local and regional roadways during construction and operation.

Tribal Cultural Resources

The City has started the tribal consultation process with affiliated tribes, in accordance with Assembly Bill 52, and tribes would be solicited for information about tribal cultural resources that may be affected by the proposed Program. Construction of the Program would include ground-disturbing activities. Therefore, there may be the potential for impacts to tribal cultural resources during construction. The PEIR will evaluate potential effects to tribal cultural resources and incorporate the results of tribal consultations into the analysis.

Utilities/Service Systems

Many Program components would require subterranean work, with a potential for disruptions to utilities and service systems. The PEIR will evaluate the potential for construction and operation of the Program to result in disruption of existing public utilities, such as water or sewage treatment, electric, natural gas, and telecommunications. The PEIR will also evaluate potential effects to stormwater drainage and solid waste disposal systems.

Wildfire

Proposed Program components could be implemented within State and Local Responsibility Areas or lands classified as very high fire hazard severity zones. The PEIR will evaluate the Program's potential impacts related to wildfire risk.

Mandatory Findings of Significance

The PEIR will include an assessment of the potential for significant Environmental Degradation, short-term vs. long-term environmental goals, and cumulative effects for each resource area described above. In particular, cumulative effects to groundwater will be evaluated due to coordinated operation of the Program with LADWP's existing programs and any other neighboring groundwater recharge or recovery facilities operated by WRD, MWD, West Basin, and other agencies. Cumulative effects to marine water quality will consider existing discharges and proposed facilities nearby. The PEIR will include an assessment of cumulative impacts, from air emissions to local air quality and to global climate through GHG emissions.

CEQA-Plus Requirements

Construction of the proposed Program may require federal funding, or elements of the Program may require construction or easements on federally-owned land, which may require NEPA compliance. As a result, the PEIR will be a CEQA-Plus document that analyzes the Program for impacts related to federal laws and regulations, including the Clean Air Act, Coastal Barriers Resources Act, Coastal Zone Management Act, Endangered Species Act, Farmland Protection Policy Act, Flood Plain Management, National Historic Preservation Act, Magnuson-Stevens Fishery Conservation and Management Act, Migratory Bird Treaty Act, wetlands protection, Safe Drinking Water Act, and the Wild and Scenic Rivers Act. These issues will be discussed within the appropriate resource sections listed above. In addition, the PEIR will include an Environmental Justice section as described below. This “cross cutter” analysis supports federal agencies with their NEPA compliance requirements.

Environmental Justice

The PEIR will include an assessment on the potential for the proposed Program to adversely affect low-income, minority, or disadvantaged populations disproportionately. The analysis will evaluate construction corridors of the many linear pipeline routes traversing disparate communities. In addition, the location of aboveground water system infrastructure may disproportionately affect disadvantaged neighborhoods. The analysis will document the demographics of affected communities and will evaluate the potential for avoiding, reducing, and mitigating adverse impacts to affected communities.