

Initial Study/Mitigated Negative Declaration
Encino Reservoir Floating Solar Pilot Project

Lead Agency:



Los Angeles Department of Water and Power
Environmental Planning and Assessment
111 N. Hope Street, Room 1044
Los Angeles, California 90012

December 2025

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**CEQA Initial Study/Mitigated Negative Declaration
Encino Reservoir Floating Solar Pilot Project**

December 2025

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ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
AQMP	Air Quality Management Plan
BMP	best management practice
BESS	battery energy storage system
BoS	Battery of System
BSA	Biological Study Area
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFGC	California Fish and Game Code
City	City of Los Angeles
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CNDDDB	California Natural Diversity Database
CRHR	California Register of Historical Resources
CRMP	cultural resources monitoring plan
dB	decibel
dba	decibel on the A-weighted scale
IPaC	Information for Planning and Consultation
FESA	Federal Endangered Species Act
FTBMI	Fernando Tataviam Band of Mission Indians
GHG	greenhouse gas
IS/MND	Initial Study/Mitigated Negative Declaration
Kizh Nation	Gabrieleno Band of Mission Indians - Kizh Nation
kW	kilowatt
kV	kilovolt
LADOT	City of Los Angeles Department of Transportation
LADOT Guidelines	LADOT Transportation Assessment Guidelines
LADWP	Los Angeles Department of Water and Power
LAFD	Los Angeles Fire Department
LAHCM	Los Angeles Historic-Cultural Monument
LAPD	Los Angeles Police Department
LBVI	least bell's vireo
L_{eq}	Equivalent Noise Level
L_{max}	Maximum Noise Level
LRA	Local Responsibility Area
LST	Localized Significance Threshold
MBTA	Migratory Bird Treaty Act
Mitigated Negative Declaration	MND
MTCO _{2e}	metric tons of carbon dioxide equivalent
MW	megawatt
MWh	megawatt hours
NFPA	National Fire Protection Association
NRHP	National Register of Historic Places
O ₃	ozone
OS-1XL/OS	Open Space
PPV	peak particle velocity

PM	particulate matter
RMS	root mean square
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
TCR	Tribal Cultural Resources
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
WOTUS	Waters of the United States

1 PROJECT DESCRIPTION

1.1 Project Overview

The Los Angeles Department of Water and Power (LADWP) proposes to implement the Encino Reservoir Floating Solar Pilot Project (proposed project), which consists of the installation of floating solar panels, associated conduit, and electrical components, including inverters, transformer, and switchgear. A battery energy storage system (BESS) and a ground-mount solar system would also be installed at the Encino Reservoir property as part of the proposed project. The purpose of the proposed project is to test the efficacy and efficiency of floating solar panels as a pilot project, which, if viable, would create an opportunity to increase renewable energy generation in the LADWP system.

1.2 California Environmental Quality Act

The California Environmental Quality Act (CEQA) (California Public Resources Code Section 21000 et seq.) applies to proposed projects initiated by, funded by, and/or requiring discretionary approvals from state or local government agencies. The construction and operation of the proposed project constitutes a project as defined by CEQA (California Public Resources Code Section 21065). Section 15367 of the CEQA Guidelines (14 California Code of Regulations 15000–15387) states that a CEQA lead agency is “the public agency which has the principal responsibility for carrying out or approving a project.” Therefore, as a municipal utility that would fund, implement, and have discretionary approval authority for the proposed project, LADWP is the lead agency responsible for compliance with CEQA.

As the lead agency, LADWP must complete an environmental review of the proposed project to determine if its implementation may result in significant adverse environmental impacts, as defined under CEQA, and to propose feasible measures, to reduce or eliminate any adverse environmental impacts that have been identified. LADWP has prepared an Initial Study (IS) to assist in making that determination. Based on the nature and scope of the proposed project and the evaluation contained in the IS environmental checklist (included herein), LADWP, as the lead agency, has concluded that a Mitigated Negative Declaration (MND) is the proper level of CEQA environmental documentation for the project. The IS shows that impacts caused by the proposed project are either less than significant or would be reduced to a less than significant level with the incorporation of appropriate mitigation measures as included herein. This conclusion is supported by CEQA Guidelines Section 15070, which states that an MND can be prepared when the IS identifies potentially significant effects, but the proposed project would either include revisions to the project plans or incorporate mitigation measures that would avoid the effects or reduce them to a less than significant level.

1.3 Project Location and Environmental Setting

The proposed project site is located within the Encino Reservoir property at 4500 Encino Avenue in the Encino neighborhood of the City of Los Angeles (City). The Encino Reservoir property is approximately 960 acres and owned and operated by LADWP. The property is closed to the public and is partially secured by fences and gates. Within the property is the approximately 130-acre reservoir, encircled by a paved perimeter access road. Along the western portion of the access road is a spur road that leads to a boat ramp that provides direct access to the reservoir surface. The Encino Filtration Plant is located north of the reservoir; it houses a small treatment facility and the Encino Pump Station. There is an existing 34.5 kilovolt (kV) distribution pole line that traverses the western part of the Encino Reservoir property.

The Encino Reservoir property is generally bound by the Santa Monica Mountains to the south and single-family residences to the north, west, and east. The property is located in the Encino-Tarzana Community Plan Area of the City, has a General Plan land use designation of OS (Open Space), and is zoned OS-1XL (Open Space). The proposed project facilities are located within the interior of the property. The main gate for Encino Reservoir is located at the north end of the property, reached via Encino Avenue. Regional access is provided via Ventura Boulevard and U.S. Route 101. Figure 1 illustrates the regional location of the project site, and Figure 2 illustrates the existing Encino Reservoir property and surrounding vicinity.



Source: Google Earth Pro, April 2025



ENCINO RESERVOIR FLOATING SOLAR PILOT PROJECT
Encino Reservoir and Vicinity

Figure 2

1.4 Project Background

1.4.1 Encino Reservoir

Encino Reservoir was constructed between 1921 and 1924 to provide storage capacity for 3,348 acre-feet (1,090 million gallons) of water for the City. During this time period, a paved roadway was also constructed around the reservoir, and a caretaker's residence was constructed north of the reservoir. By 1960, population growth in the San Fernando Valley required an enlargement of Encino Reservoir to 11,606 acre-feet (3.25 billion gallons). The expansion project began in July 1961 and concluded in 1963. Between the 1990s and early 2000s, LADWP constructed an emergency spillway that included an outlet pipe and a concrete channel extending approximately 1,400 feet northeast from the reservoir.

Due to concerns about maintaining water quality in relation to updated water quality regulations, Encino Reservoir was taken out of service in December 2002 after the completion of the construction of new water supply trunk lines that enhanced water quality and reliability in the reservoir service area. In 2006, a new pump station and microfiltration plant were constructed adjacent to the reservoir. The pump station continues to operate, while the reservoir has remained out of service.

The project is proposed to help meet renewable energy goals set by the State of California and the City to reduce reliance on carbon-based energy sources. The proposed project is estimated to generate approximately 10,280 megawatt hours (MWh) of clean, renewable energy annually. The energy produced is the equivalent of serving approximately 2,677 homes per year, offsetting 2,854 metric tons of carbon dioxide equivalent (MTCO_{2e}) per year, and eliminating 671 cars from the road per year. However, as mentioned above, the primary purpose of the proposed project is to determine the viability of floating solar as a technology that can provide opportunities for additional renewable energy generation within the LADWP system, especially within the in-basin area available space associated with open bodies of water.

1.5 Project Description

The project proposes to construct a 5-megawatt (MW), 10-acre floating solar panel array that would be located on the southwest portion of Encino Reservoir. An approximately 4,000 square-foot 30-kilowatt (kW), ground-mount photovoltaic system would also be installed in the southwest area of the reservoir property. All associated electrical components, including inverters, transformers, and switchgear would be located adjacent to the ground-mount system. All electrical equipment would interconnect to the existing 34.5-kV above ground distribution line within the Encino Reservoir property. In addition to the solar components discussed above, a 5-MW, 20-MWh BESS would be installed on an approximately 6,500 square-foot area north of the reservoir. Figure 3 shows the proposed project components.

1.5.1 Floating Solar Panels

The floating platform for the solar panels would arrive as prefabricated modular units with attachment points for solar panel mounting. These floating units would be connected to form a stable interlocking structure approximately 10 acres in size. The floating solar system would be anchored with concrete ballasts. The solar panels would be installed with a fixed-tilt and would be able to withstand high wind speeds and turbulence due to potential waves. There would be waterproof cable trays and flexible floating conduits to route power and prevent cables from submerging.

Conduit

An approximately 320-foot conduit would connect the floating solar panels to the land-based switchgear and associated electric equipment described under Section 1.5.2. From the floating solar panels, the conduit would be installed along the bottom of the reservoir until reaching the reservoir concrete sidewall. Once reaching the sidewall, the conduit would be placed on elevated galvanized strut channels supported by precast rubber mounts and concrete ballast; this system would prevent any modifications to the existing reservoir concrete sidewall. The conduit would be trenched under the perimeter access road beyond the boundaries of the concrete sidewall. To the southwest of the access road, the conduit would continue aboveground to the inverters near the ground-mount solar panels.

1.5.2 Ground-Mount Solar and Associated Equipment

The ground-mount solar panels, inverters, transformers, switchgear, and associated equipment would be installed southwest of the reservoir. The ground-mounted solar facility is intended to provide a basis of comparison for energy production from the floating solar panels with an adjacently located known solar technology. The 30-kW ground-mount solar panels would be mounted onto an approximately 4,000 square-foot concrete foundation. The mounting racks would be prefabricated metal frames attached to the foundation and would be positioned at a fixed tilt. The solar panels would be installed to the rack system and connected to the inverters.

The inverters, transformers, and switchgear would be installed on concrete pads adjacent to the ground-mounted solar panel. The inverters would be used to convert direct current electricity from the floating and ground-mount solar panels into alternating current and would be installed on an approximately 1,300 square-foot concrete pad. The transformer would be installed on an approximately 300 square-foot concrete pad. It would have a capacity of 5 megavolt-amperes and would change the voltage levels to facilitate the transmission of electricity from the solar facilities. The switchgear would be installed on an approximately 150 square-foot concrete pad and would control, protect, and isolate electrical equipment.

1.5.3 Battery Energy Storage System Facility

The BESS would consist of iron-flow batteries that would have a maximum power output of 5 MW and an energy capacity of 20 MWh. The BESS would be installed in the northern portion of the Encino Reservoir property, west of the pump station and microfiltration plant, and would have a footprint of approximately 6,500 square feet. The batteries would be modular, scalable/stackable, and pre-assembled. The batteries would be stored in containers meeting National Electrical Manufacturers Association (NEMA) standards, with each container approximately 40 feet long, 8 feet wide, and 9.5 feet tall. The BESS would be enclosed with concrete walls that would be 5 feet taller than the containers.

Iron-flow batteries have iron-based electrodes with conductive carbon and air electrodes that use oxygen to store energy. The iron-flow batteries are made of iron, salt, water, aluminum, steel, and recyclable plastics. There would be a water-based cooling system for the stacks to prevent overheating and ensure the battery's optimal and safe operation. The iron-flow BESS would require an electrolyte solution that needs to be replenished or replaced every five to ten years. The tanks for the electrolyte would be stacked with the battery components or encased in the same container.

BESS ancillary equipment, including inverters and a switchgear, would be placed on separate concrete pads adjacent to the BESS. Cabling would connect the BESS to the inverters and the existing 34.5kV transmission system adjacent to the BESS.

The BESS would have a Balance of System (BoS) which includes a Battery Management System that remotely monitors and controls state-of-charge, system performance, and safety protocols. The BoS would use analytics and predictive maintenance. The BESS would also include an automated emergency shutdown protocol in case of a system malfunction.

Although iron-flow batteries are not considered a fire hazard, the BESS would be designed to comply with all current fire safety regulations in accordance with the National Fire Protection Association (NFPA) 855: Standard for the Installation of Stationary Energy Storage Systems, UL 9540: Test Method for Battery Energy Storage Systems, and UL 9540A: Test Method for Battery Energy Storage Systems. Additionally, all hazardous materials would be properly contained such that substances would not spill or leak. Routine maintenance would be conducted for the BESS performance and for periodic inverter inspections.



Source: Google Earth Pro, October 2025



NOT TO SCALE

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ENCINO RESERVOIR FLOATING SOLAR PILOT PROJECT
Proposed Project Components

Figure 3

1.6 Construction

Construction of the proposed project is expected to commence in July 2026 with completion anticipated in July 2027. It would consist of five phases of varying durations that would likely overlap. The first phase of construction would be the installation of the proposed floating solar panels and last approximately three months. Following the floating solar installation, electrical connections, installation of the conduit, and installation of the inverter and switchgear would take approximately six months. Energization of the floating solar panels and system testing would take approximately one to two months. Following system testing, the BESS would be installed, taking approximately five months. Lastly, the ground-mount solar panels would be installed, taking approximately three months. The estimated schedule for the project components is shown below.

Phase	2026						2027						
	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul
Floating Solar Installation	█												
Conduit and Electrical Connections			█										
Energization and System Testing								█					
BESS Installation									█				
Ground-Mount Solar Installation											█		

Construction, assembly, and deployment of the floating solar panels would occur in phases. The solar panels, floats, and electronics would be assembled into small sections on land, which would then be deployed onto the reservoir using the existing boat ramp. To facilitate construction and deployment of the floating panels, approximately 4,500 square feet of vegetation at the bottom of the ramp may need to be cleared. A temporary floating dock would be deployed. The dock would be modular and buoyant to provide a stable and secure platform for temporary use, such as boat access, solar panel staging, and other construction activities. From the dock, a barge/workboat would be used to float the prefabricated modular units to their final location. To form a stable interlocking structure, the units would include connection mechanisms that secure to one another using either bolted or clamped connections, hinged or flexible joints, or interlocking slots or pegs. The floating solar system would then be anchored to the reservoir floor with concrete ballasts. The floating panels would connect to the inverters via waterproof cable trays, flexible floating conduits, and a ground mounted conduit which would run up the sidewall and under the existing access road. Construction of the conduit may require clearing or trimming vegetation below the concrete sidewall; the conduit would be elevated on galvanized strut channels supported by rubber blocks as it runs up the sidewall face until it is trenched under the existing access road. The rubber block and channel system would be held in place by pre-cast concrete blocks, which would prevent modifications to the existing reservoir sidewall. All trenches would be backfilled and restored.

Construction of the BESS would require site preparation, including vegetation clearing, grading, and leveling; installation of the foundation; placement of the BESS; and electrical installation. The BESS would require an approximately 6,500 square-foot concrete foundation of about 12-18 inches in depth. The excavated area would be compacted with about a six-inch layer of gravel to provide drainage and a stable base. Anchor bolts would be embedded in the concrete to secure the equipment. Cranes or forklifts would position the battery stacks, and the BESS would be connected to the existing 34.5 kV system.

The proposed location of the BESS contains a number of trees. It is anticipated that up to 10 trees may be removed as part of the proposed project. If any protected trees or shrubs need to

be removed, LADWP would submit a Protected Tree and Shrub Report and a Tree Removal Permit Application to the City prior to construction and obtain a permit prior to removal.

Construction of the ground-mount solar panels would require site preparation, including vegetation clearing, grading, and leveling; installation of the foundation; installation of the rack/mounting system; and installation of the solar panels. The foundation would impact approximately 5,300 square feet and require excavation of up to 18 inches for the concrete pad for the ground-mount solar, inverters, transformer, and switchgear. The rack/mounting system would consist of prefabricated metal frames that would be attached to the foundation. Solar panels would be secured to the racking system, and wiring and inverter connections would be made.

Pursuant to Los Angeles Municipal Code 41.40, construction activities are allowable between 7:00 a.m. and 9:00 p.m. Monday through Friday and between 8:00 a.m. and 6:00 p.m. on Saturdays. Construction for the proposed project would only occur during daylight hours, and no nighttime construction would occur. Additionally, construction work would not be performed on Sundays or national holidays, except under emergency conditions.

Construction vehicle traffic would access the project site via the main gate for the Encino Reservoir property at Encino Avenue. Temporary staging and laydown areas for construction materials, equipment, and worker vehicle parking would be adjacent to the existing pump station and microfiltration plant. Construction materials would be transported to the western area of Encino Reservoir in close proximity to the location of the floating solar panels. As all work would occur within the boundaries of the Encino Reservoir property, no lane closures on public roads would be required during project construction.

During the peak of construction activity, it is anticipated that the number of on-site daily workers would be 10. The average daily number of workers would be approximately 7. The equipment needed for the proposed project would include dozers, graders, excavators, cranes, forklifts, concrete mixers, and loader/backhoes. Barges/workboats would also be required for the installation of the floating solar panels. Water trucks would be provided during all construction activities. Trucks would be required to deliver construction materials, solar panels, the BESS containers, and off-road construction equipment to the project site. During the peak of construction, a maximum of 10 truck trips per day would be required, which would generally be distributed throughout the workday. There would be approximately 100 truck trips in total during project construction.

1.7 Operation

Maintenance of the floating and ground-mount solar panels would be ongoing and include inspection of the solar panels, floats, anchors, electrical, and onshore equipment. Additionally, periodic cleaning of the floating and ground-mount solar panels would be required to clear the panels of debris and soiling. To access the floating solar panels, the area around the bottom of the boat ramp would need to be permanently maintained to be clear of vegetation. Occasional vegetation clearing and maintenance of the electrical components would be required to maintain safe operation. As discussed in Section 1.5.3, the operation of the BESS would have a BoS, which includes a cloud-based remote monitoring system. The iron-flow BESS would also require an electrolyte solution that would be replenished or replaced every five to ten years. Routine maintenance would be conducted for the BESS performance and for periodic inverter inspections. It is not anticipated that any new personnel would be required to operate the proposed project.

1.8 Required Permits and Approvals

Various approvals and/or permits would be required to implement the proposed project and may include, but not be limited to, the following:

- California Division of Safety of Dams
 - Alteration Permit
- California Department of Fish and Wildlife
 - Section 1602 Notification of Lake or Streambed Alteration
- Los Angeles Regional Water Quality Control Board
 - Waste Discharge Requirements (WDR) Permit
- South Coast Air Quality Management District (SCAQMD)
 - Rule 1470 related to stationary diesel fueled engines

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2 ENVIRONMENTAL DETERMINATION

The following discussion of potential environmental effects was completed in accordance with Section 15063(d)(3) of the CEQA Guidelines (2025) to determine if the proposed project may have a significant effect on the environment.

CEQA INITIAL STUDY FORM

Project Title:

Encino Reservoir Floating Solar Pilot Project

Lead Agency Name and Address:

Los Angeles Department of Water and Power
Environmental Planning and Assessment
111 N. Hope Street, Room 1044
Los Angeles, CA 90012

Contact Person and Phone Number:

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Project Sponsor's Name and Address:

Los Angeles Department of Water and Power
111 N. Hope Street, Room 1044
Los Angeles, CA 90012

City Council District:

4th District – Councilmember Nithya Raman

Neighborhood Council:

Encino

Project Location:

The proposed project would be located in the Encino neighborhood of the City of Los Angeles at the 4500 Encino Avenue. The Encino Reservoir property is approximately 960 acres and owned and operated by LADWP. The property is closed to the public and is partially secured by fences and gates. Within the property is the approximately 130-acre reservoir, encircled by paved perimeter access road. A pump station and microfiltration plant are in the northern portion of the property, north of the reservoir. There is an existing 34.5 kV distribution pole line that traverses the western part of the Encino Reservoir property. The proposed floating solar panel array would be located on the southwest portion of Encino Reservoir. The proposed electric conduit, ground-mount solar panels, and associated electrical components including inverters, a transformer, and switchgear, would be located to the southwest of the reservoir. The proposed BESS would be located in the northern portion of the Encino Reservoir property, west of the pump station and microfiltration plant.

General Plan Designation:

The project site has a General Plan designation of OS (Open Space).

Zoning:

The project site is zoned OS-1XL (Open Space).

Description of Project:

LADWP proposes to construct a 5-MW, 10-acre floating solar panel array that would be located on the southwest portion of Encino Reservoir. An electric conduit would connect from the floating solar panels to the approximately 4,000 square-foot 30-kW ground-mount solar panels and associated electrical components including inverters, a transformer, and switchgear located to the southwest of the reservoir. Those components would connect to the existing 34.5-kV above ground distribution line within the Encino Reservoir property, which would tie into an approximately 6,500 square-foot 5-MW, 20-MWh BESS located north of the reservoir. The purpose of the proposed project is as a pilot project to test the efficacy and efficiency of floating solar panels, which, if viable, would create an opportunity to increase renewable energy generation in the LADWP system.

Surrounding Land Uses and Setting:

The Encino Reservoir property is generally bound by the Santa Monica Mountains to the south and single-family residences to the north, west, and east. Local access to the property is provided via Encino Avenue, and regional access is provided via Ventura Boulevard and U.S. Route 101.

2.1 Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology and Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards and Hazardous Materials |
| <input type="checkbox"/> Hydrology and Water Quality | <input type="checkbox"/> Land Use and Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

2.2 Environmental Determination

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



November 19, 2025

Signature
 Jane Hauptman
 Manager of Environmental Planning and Assessment
 Los Angeles Department of Water and Power

Date

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3 ENVIRONMENTAL IMPACT ASSESSMENT

3.1 Aesthetics

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

Discussion

a) Except as provided in Public Resources Code Section 21099, would the project have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. Scenic vistas are generally defined as panoramic public views to various natural features, including large water bodies or striking or unusual natural terrain, or unique urban or historic features. The closest designated scenic vista in the vicinity of the project site is the San Vicente Mountain Park major vista point approximately 0.75 mile south of the project site.¹ However, the project components are not visible from this view point, and the proposed project would not impact views of this scenic vista.

Views from Mulholland Drive, a publicly-accessible trail, located approximately 4,500 feet south of the proposed project facilities at their nearest point, include Encino Reservoir and the Santa Monica Mountain ridgelines in the foreground, and panoramic views of the San Fernando Valley and Santa Susana Mountains in the background. However, the project components are only partially visible from portions of Mulholland Drive due to the location of the components and intervening topography and vegetation. Additionally, the proposed project would not obstruct scenic vistas from any location along Mulholland Drive. As shown in Figures 4-1 and 4-2 below, taken from a view point along Mulholland Drive with the greatest visual access to the proposed floating solar installation location, the solar panels would not represent an obtrusive feature in the landscape. The proposed floating solar panels generally blend in with the surrounding environment. Views of Encino Reservoir, the Santa Monica Mountain ridgelines, San Fernando Valley, and Santa Susana Mountains are still available and remain unchanged from existing conditions. Therefore, the proposed project would not substantially impact a scenic vista, and impacts would be less than significant.

¹ City of Los Angeles, Department of City Planning. 1992. *Mulholland Scenic Parkway Specific Plan*.



Source: Google Earth Pro, October 2025



ENCINO RESERVOIR FLOATING SOLAR PILOT PROJECT

Viewpoint Location

Figure 4-1



Figure 4-2 Existing and Simulated View Looking Northwest from Mulholland Drive

b) Except as provided in Public Resources Code Section 21099, would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. There are no state-designated scenic highways in the vicinity of the project site. The nearest eligible state-designated scenic highway is located approximately five miles west of the Encino property. Mulholland Drive, south of Encino Reservoir, is designated under the City's Mulholland Scenic Parkway Specific Plan as a scenic parkway.² The Scenic Parkway includes both an Inner Corridor (extending 500 feet outward from the edge of the road right-of-way) and an Outer Corridor (extending from the edge of the Inner Corridor to 0.5 miles outward from the edge of the road right-of-way), within which new construction is subject to various policies and regulations as well as review by the Mulholland Scenic Parkway Design Review Board. The proposed project facilities are all located approximately 1,500 feet beyond the edge of the Outer Corridor at the nearest point. Therefore, the proposed project is not subject to the provisions of the specific plan. (In relation to scenic vistas from Mulholland Drive, see item 3.1(a), above.) Therefore, no impact would occur.

c) Except as provided in Public Resources Code Section 21099, would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

No Impact. The project site is located in an urbanized area, the Encino community of the City of Los Angeles, and is zoned OS-1XL (Open Space) under the City's zoning code and designated OS (Open Space) under the Encino-Tarzana Community Plan of the City's General Plan.^{3,4} The OS designation permits various uses, including public water supply reservoirs (uncovered) and accessory uses which are incidental to the operation and continued maintenance of such reservoirs.⁵

The project site has historically been used as a public water supply reservoir until 2002, when the reservoir functions were taken out of service after the completion of the construction of new water supply trunk lines that enhanced water quality and reliability in the reservoir service area. The proposed project would not result in changes to the land use and zoning designations of the project site. Further, the project site is not located within the boundaries of the Mulholland Scenic Parkway Specific Plan, and as such, would not be subject to the policies or regulations of that plan.⁶ Therefore, the proposed project would not conflict with applicable zoning or other regulations governing scenic quality. No impact would occur.

² City of Los Angeles, Department of City Planning. 1992. *Mulholland Scenic Parkway Specific Plan*.

³ City of Los Angeles Zoning Information and Map Access System (ZIMAS). Available at: <http://zimas.lacity.org/>. Accessed June 2025.

⁴ City of Los Angeles, Department of City Planning. 2010. General Plan Land Use Map Encino-Tarzana Community Plan.

⁵ City of Los Angeles. Zoning Code, Section 12.04.05, "OS" Open Space Zone.

⁶ City of Los Angeles, Department of City Planning. 1992. *Mulholland Scenic Parkway Specific Plan*.

d) Except as provided in Public Resources Code Section 21099, would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. During the construction period, activities would be limited to daytime hours, and no nighttime construction lighting would be required. During operation, infrared lights, which are typically not detectable by the naked eye, would be installed around the perimeter of the floating solar system for aircraft navigation purposes (i.e., during helicopter access to the reservoir for firefighting operations). The other project components would not require any lighting. The proposed floating solar panels would not create glare because solar panels are designed to maximize the absorption of sunlight. Therefore, impacts related to substantial light or glare would be less than significant.

3.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><i>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</i></p>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a) Would the project 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?

No Impact. According to the California Important Farmland Finder maintained by the California Department of Conservation, the Encino Reservoir property is designated as Water Area, Other Land, and Urban and Built-Up Land.⁷ The project site is not located on or near Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, nor does it include agricultural uses. Therefore, the proposed project would not convert Farmland to a non-agricultural use, and no impact would occur.

⁷ California Department of Conservation. Farmland Mapping & Monitoring Program, California Important Farmland Finder. Available at: <https://maps.conservation.ca.gov/DLRP/CIFF/>. Accessed December 2024.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Williamson Act enables local governments to enter contracts with private landowners to restrict specific parcels of land to agricultural or related open space use in exchange for reduced property tax assessments for the landowners. There are no existing Williamson Act contracts within Los Angeles County.⁸ Additionally, the project site, which is completely within the Encino Reservoir property, is zoned OS. Therefore, the proposed project would not conflict with existing zoning for agricultural use or a Williamson Act contract, and no impact would occur.

c) Would the project 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))?

No Impact. The project site is zoned Open Space (OS-1XL) under the City's zoning code.⁹ The project site is not located in an area zoned for forest land or timberland as defined in Public Resources Code Section 12220(g) and Government Code Section 4526.¹⁰ Therefore, the proposed project would not conflict with existing zoning for or cause a rezoning of forest land or timberland, and no impact would occur.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. No portion of the project site is developed for forest land use or located adjacent to forest lands.¹¹ Therefore, the proposed project would not result in the loss of forest land or conversion of forest land to non-forest use, and no impact would occur.

e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. The proposed project would be located within an urbanized area of the City of Los Angeles. There are no areas designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on or near the project site, and no forest lands exist within the vicinity of the project site. Therefore, the proposed project would not change the existing environment in a way that would result in the conversion of farmland to non-agricultural use or forest land to non-forest use. No impact would occur.

⁸ California Department of Conservation. California Williamson Act Enrollment Finder. Available at: <https://maps.conservation.ca.gov/dlrp/WilliamsonAct/>. Accessed June 2025.

⁹ City of Los Angeles Zoning Information and Map Access System (ZIMAS). Available at: <http://zimas.lacity.org/>. Accessed December 2024.

¹⁰ Ibid.

¹¹ Ibid.

3.3 Air Quality

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:</i>				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

Potential impacts to air quality associated with the proposed project are based on the information presented in the Air Quality Technical Study included as Appendix A to this IS/MND.

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

Less Than Significant Impact. The South Coast Air Quality Management District (SCAQMD) is the agency responsible for regulating air quality for areas of Los Angeles, Orange, Riverside, and San Bernardino Counties. The City of Los Angeles, including the project site, is located within the South Coast Air Basin (SCAB), which is a defined geographic sub-region within the SCAQMD’s jurisdiction. Analyses of the proposed project’s consistency with the policies of the SCAQMD *CEQA Air Quality Handbook* and the SCAQMD’s 2022 Air Quality Management Plan (AQMP) are provided below.

SCAQMD CEQA Air Quality Handbook Consistency Analysis

In accordance with the procedures established in SCAQMD’s *CEQA Air Quality Handbook*, the impact discussion addresses the following criteria to determine whether the proposed project is consistent with applicable SCAQMD and Southern California Association of Governments (SCAG) planning objectives:

- Would the proposed project create any impacts related to air quality violations, such as:
 - An increase in the frequency or severity of existing air quality violations;
 - Causing or contributing to new air quality violations; or,
 - Delaying timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- Would the proposed project exceed the assumptions utilized in preparing the AQMP:

- Is the proposed project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
- Does the proposed project incorporate mitigation measures to reduce potentially significant impacts; and/or
- To what extent is proposed project development consistent with the AQMP land use policies and control measures?

The first indicator of AQMP consistency is assessed by determining if the proposed project would result in an air quality violation, which would occur when facilities are out of compliance with applicable SCAQMD rule requirements, permit conditions or legal requirements, or with applicable state or federal air pollution regulations. The SCAQMD developed its regional and localized air quality significance thresholds as screening tools to avoid the potential occurrence and exacerbation of air quality violations resulting from construction and operation of individual projects in the context of CEQA.

The second indicator of AQMP consistency is assessed by determining potential effects of project implementation on forecasted growth projections for population, housing, and employment assumptions that are used in the development of the AQMP and the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) emissions budgets. If implementation of the proposed project would render the assumptions invalid by introducing growth within the region that exceeds projections incorporated into the AQMP, a significant air quality impact may occur.

Construction

Construction activities would generate emissions from off-road equipment usage, on-road vehicle travel (truck hauling, vendor deliveries, and workers commuting), architectural coating, and paving. Construction emissions were calculated using the SCAQMD recommended CalEEMod (Version 2022.1.1.29). CalEEMod default values were used for equipment and vehicle emission factors, equipment load factors, and vehicle trip lengths. Maximum daily emissions calculated in CalEEMod represent conservative estimates of the worst-case daily emissions in each phase of construction based on continuous equipment activity.

Construction of the proposed project would be conducted in accordance with the applicable rules and regulations, including but not limited to best management practices provided in SCAQMD Regulation IV, specifically Rule 401 (Visible Emissions) and Rule 403 (Fugitive Dust). Based on fugitive dust experiments conducted in real-world conditions, CalEEMod documentation indicates that the application of water as a dust suppressant to material stockpiles and disturbed ground areas reduces fugitive dust emissions during construction activities by approximately 61 percent. Furthermore, all construction equipment and vehicles would be maintained and operated within manufacturer specifications to limit unnecessary emissions during use, and any vehicles traveling on unpaved surfaces would be required to limit their speed to 15 miles per hour or less. Idling of any off-road equipment or on-road vehicles would be limited to no more than five minutes in any one location in accordance with Section 2485 in Title 13 of the California Code of Regulations.

Table 3-1 presents the maximum daily regional emissions that would be generated during each construction phase to implement the proposed project. The maximum emissions for the project were based on total overlapping phases of construction based on the preliminary construction schedule. Estimates of maximum daily air pollutant emissions that would be generated by construction activities can be used to demonstrate that the proposed project would not conflict

with or obstruct implementation of the 2022 AQMP with regards to increasing the frequency or severity of existing air quality violations. As shown below, construction of the proposed project would not generate daily emissions of criteria pollutants or ozone (O₃) precursors in excess of any SCAQMD regional threshold. Thus, construction of the proposed project would not have the potential to obstruct or conflict with implementation of the AQMP in the context of SCAQMD rule requirements. Therefore, construction of the proposed project would not create any air quality violations, nor would it conflict with or obstruct implementation of the AQMP or delay the path towards achieving the emissions reductions set forth therein. Impacts would be less than significant.

Table 3-1: Estimated Daily Emissions - Construction

Phase and Emission Source Location	Daily Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
FLOATING SOLAR INSTALLATION						
On-Site Emissions	1.1	11.6	15.0	<0.1	0.8	0.4
Off-Site Emissions	0.1	1.3	1.8	<0.1	0.6	0.2
Total	1.2	13.0	16.8	<0.1	1.3	0.6
CONDUIT AND ELECTRICAL CONNECTIONS						
On-Site Emissions	1.4	11.8	14.2	<0.1	1.9	0.8
Off-Site Emissions	0.1	1.3	1.8	<0.1	0.5	0.1
Total	1.5	13.1	16.0	<0.1	2.4	0.9
INVERTER/SWITCHBOARD INSTALLATION						
On-Site Emissions	2.6	23.1	28.1	<0.1	2.3	1.1
Off-Site Emissions	0.1	1.6	1.7	<0.1	0.6	0.2
Total	2.7	24.7	29.8	<0.1	2.9	1.3
ENERGIZATION AND SYSTEM TESTING						
On-Site Emissions	0.4	3.2	3.9	<0.1	0.3	0.1
Off-Site Emissions	0.1	0.3	1.1	<0.1	0.3	0.1
Total	0.4	3.6	5.0	<0.1	0.6	0.2
BESS INSTALLATION						
On-Site Emissions	2.5	21.8	28.1	0.1	2.0	1.0
Off-Site Emissions	0.1	1.8	1.9	<0.1	0.7	0.2
Total	2.6	23.7	30.0	0.1	2.7	1.2
GROUND-MOUNT SOLAR INSTALLATION						
On-Site Emissions	1.8	16.9	21.6	<0.1	1.3	0.7
Off-Site Emissions	0.1	1.8	1.9	<0.1	0.7	0.2
Total	1.9	18.7	23.5	<0.1	2.0	0.9
BESS INSTALLATION + GROUND MOUNT SOLAR INSTALLATION						
Maximum On-Site Emissions	4.3	38.8	49.7	0.1	3.3	1.7
Maximum Off-Site Emissions	0.2	3.6	3.8	<0.1	1.4	0.4
Total	4.5	42.4	53.5	0.1	4.7	2.1

Table 3-1: Estimated Daily Emissions - Construction

Phase and Emission Source Location	Daily Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
REGIONAL IMPACT ANALYSIS						
Maximum Regional Daily Emissions	4.5	42.4	53.5	0.1	4.7	2.1
Regional Significance Threshold	75	100	550	150	150	55
Exceed Regional Threshold?	No	No	No	No	No	No

VOC = volatile organic compounds, NO_x = nitrogen oxides, CO = carbon monoxide, SO_x = sulfur oxides, PM₁₀ = particulate matter; PM_{2.5} = fine particulate matter

Source: Appendix A: Air Quality Technical Study

Construction activity would not affect forecasted growth assumptions for the City or the Los Angeles County portion of the SCAB. It is anticipated that construction contractors and crews would be selected from the existing regional workforce, such that individuals would not be relocating from outside Los Angeles County to work on proposed project construction, which could influence population growth projections. The temporary employment of the relatively small number of personnel for project construction would not indirectly or directly contribute to the regional needs for new housing.

Operation

Because the proposed project is a solar energy facility, it would not introduce a new substantial stationary source of air pollutant emissions to the area during operation that could potentially cause or contribute to air quality violations. LADWP personnel would visit the proposed facilities for maintenance, inspection, vegetation clearing, and replenishment or replacement of the electrolyte solution for the BESS. However, personnel visits would be infrequent and would not be a new substantial source of emissions. Thus, the proposed project vehicle trips would have only a negligible effect on the mobile source emissions that are accounted for within the AQMP inventory. Moreover, implementation of the proposed project would not directly or indirectly involve the addition of new housing units within the City. LADWP does not anticipate needing to recruit new employees that would relocate to the City or Los Angeles County for project operations and maintenance. The energy provided by the project would be used to offset carbon-related generation sources to meet current and projected need. Therefore, operation of the proposed would not conflict with or obstruct implementation of the AQMP, and impacts would be less than significant.

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 Impact. The SCAB is designated as nonattainment of the CAAQS and/or NAAQS for O₃, particulate matter ten microns or less in diameter (PM₁₀), and particulate matter 2.5 microns or less in diameter (PM_{2.5}). Therefore, there is an ongoing regional cumulative impact associated with these air pollutants. The SCAQMD has published guidance addressing the evaluation of potential cumulative impacts for CEQA projects. According to this guidance, if construction or operation of a project would produce maximum daily emissions exceeding the applicable SCAQMD thresholds, those emissions would also be considered

cumulatively significant. Conversely, if construction or operation of a project would not generate emissions of sufficient quantity to exceed any of the applicable mass daily thresholds, then that project and its associated emissions would be considered less than significant in the cumulative context. As shown in Table 3-1 above, construction of the proposed project would not produce daily emissions of particulate matter or O₃ precursors in excess of the applicable SCAQMD thresholds even when considering overlapping activities. Because the proposed project is a solar energy facility, it would not introduce a new substantial stationary source of air pollutant emissions to the area during operation. Therefore, the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant, and impacts would be less than significant.

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

Less Than Significant Impact. The California Air Resources Board (CARB) has identified the following groups who are most likely to experience adverse health effects due to exposure to air pollution: children less than 14 years of age, the elderly over 65 years of age, athletes, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, land uses that constitute sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

The Encino Reservoir property is partially surrounded by residential uses, and the sensitive receptors near the project site may be exposed to pollutant concentrations from emissions sources involved in construction activities. The SCAQMD has established localized significance thresholds (LST) to determine the likelihood of substantial criteria pollutant concentrations reaching sensitive receptor locations. The LST methodology involves screening values for daily emissions of nitrogen oxides, carbon monoxide, PM₁₀, and PM_{2.5} that are generated exclusively by sources located on project sites. If maximum daily emissions remain below the LST values during construction activities, it is highly unlikely that air pollutant concentrations in ambient air would reach substantial levels sufficient to create public health concerns for sensitive receptors. As shown in Table 3-2, maximum daily emissions of criteria pollutants and ozone precursors would not exceed any applicable LST values.

Table 3-2: Estimated Daily On-Site Emissions – Construction

Phase(s)	Daily On-Site Emissions (lbs/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
INDIVIDUAL PHASES				
Floating Solar Installation	11.6	15.0	0.8	0.4
Conduit and Electrical Connections	11.8	14.2	1.9	0.8
Inverter/Switchboard Installation	23.1	28.1	2.3	1.1
Energization and System Testing	3.2	3.9	0.3	0.1
BESS Installation	21.8	28.1	2.0	1.0
Ground Mount Solar Installation	16.9	21.6	1.3	0.7
OVERLAPPING PHASES				
BESS Installation + Ground Mount Solar Installation	38.8	49.7	3.3	1.7

Table 3-2: Estimated Daily On-Site Emissions – Construction

Phase(s)	Daily On-Site Emissions (lbs/day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
LOCALIZED IMPACTS ANALYSIS				
Maximum Daily On-Site Emissions	38.8	49.7	3.3	1.7
SRA 6 LST Screening Values	103	426	4	3
Exceed Localized Threshold?	No	No	No	No

NO_x = nitrogen oxides, CO = carbon monoxide, SO_x = sulfur oxides, PM₁₀ = particulate matter; PM_{2.5} = fine particulate matter

Source: Appendix A: Air Quality Technical Study

With regards to toxic air contaminant emissions, construction of the proposed project would last for approximately one year, and daily emissions of diesel PM would fluctuate throughout the construction period. Additionally, the size of the site indicates that only during a limited portion of construction activities would heavy-duty diesel-powered equipment be operating within 100 feet of sensitive receptors. All construction equipment would be maintained in accordance with the CARB Portable Engine Air Toxics Control Measure and the Off-Road Diesel Regulation to control emissions to the maximum extent feasible. Therefore, the proposed project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant.

Because the proposed project is a solar energy facility, it would not create air pollutant emissions that could affect sensitive receptors during operation. Impacts would be less than significant during operation.

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

Less Than Significant Impact. Other than the sources addressed above, odors are the only other source of potentially impactful construction emissions. A significant impact would occur if construction activities would result in the creation of nuisance odors that would be noxious to a substantial number of people. Potential sources that may produce objectionable odors during construction activities include equipment exhaust, welding, and application of sealants or coatings. Odors from these sources would be localized and dissipate as distance from the construction sites increases, would be temporary in nature, and would not persist beyond the termination of construction activities. The proposed project would utilize typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. Construction of the proposed project would comply with the provisions of SCAQMD Rule 401 and Rule 403 to prevent the occurrence of visible dust plumes.

Because the proposed project is a solar energy facility, it would not include any uses that would create odors. Therefore, the proposed project would not result in other emissions affecting a substantial number of people, and impacts would be less than significant.

3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

Potential impacts to biological resources associated with the proposed project are based on the results presented in the Biological Resources Technical Memorandum (Appendix B and Jurisdictional Delineation Report (Appendix C). A review of relevant database, literature, and aerial imagery was conducted to determine which special-status biological resources have the potential to occur on or within the general vicinity of the project site. Field surveys were conducted on February 3, 2022, July 6, 2022, and June 20, 2023, to document existing conditions and determine the potential for special-status plant and wildlife species to occur within the project site. The Biological Study Area (BSA) included a 500-foot buffer around the project components and was assessed for potential impacts resulting from the proposed project.

Additionally, based on the recommendations from the Biological Resources Technical Memorandum, focused surveys for special-status plant species were conducted on May 29 and July 2, 2025, and for least Bell’s vireo during the spring and summer seasons. The results of the focused surveys are summarized herein and documented in the Results of Special-Status Plant

Species Surveys Memorandum (Appendix D) and Results of Least Bell's Vireo Protocol Surveys Memorandum (Appendix E).

a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant Impact with Mitigation Incorporated. A significant impact could occur if the proposed project removed or modified the habitat for, or otherwise directly or indirectly affected, any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS).

Special-Status Plant Species

Special-status plant species include those listed as endangered, threatened, rare, or those species proposed for listing by USFWS under the Federal Endangered Species Act (FESA), those listed or proposed for listing by CDFW under the California Endangered Species Act (CESA), and those listed as rare by the California Native Plant Society (CNPS).^{12,13,14} A search of the U.S. Geological Survey (USGS) Canoga Park quadrangle and the surrounding eight quadrangles (Topanga, Malibu Beach, Calabasas, Santa Susana, Oat Mountain, San Fernando, Van Nuys, and Beverly Hills) was conducted using information from CDFW's California Natural Diversity Database (CNDDDB)¹⁵ and the California Native Plant Society's (CNPS) on-line Inventory of Rare and Endangered Plants of California.¹⁶ Additionally, the USFWS' online Information for Planning and Consultation (IPaC) database¹⁷ was queried for special-status species, sensitive natural communities, and protected areas known in the project vicinity.

There is no USFWS-designated Critical Habitat for special-status plant species within the project site area. Fifty-nine (59) special-status plant species were identified during the database review to have historically been recorded in Canoga Park and surrounding eight quadrangles, an area of approximately 500 square land miles, extending up to 20 linear miles from the project site. The IPaC search included 16 federally-listed species. According to the CNPS inventory, there are several special-status plant species that have a moderate potential for occurrence within the BSA, including the Braunton's milk-vetch (*Astragalus brauntonii*), slender mariposa-lily (*Calochortus clavatus var. gracilis*), Plummer's mariposa-lily (*Calochortus plummerae*), Santa Susana tarplant (*Deinandra minthornii*), Santa Monica dudleya (*Dudleya cymosa ssp. ovatifolia*), chaparral nolina (*Nolina cismontana*), Lyon's pentachaeta (*Pentachaeta lyonia*), and Greata's aster (*Symphotrichum greatae*). However, there are no records of special-status plant

¹² Species listed or proposed for listing as threatened or endangered under the federal Endangered Species Act (Title 50 Code of Federal Regulations [CFR] 17.12 [listed plants], Title 50 CFR 17.11 [listed animals] and includes notices in the Federal Register for proposed species).

¹³ Species listed or proposed for listing by the State of California as threatened or endangered under the California Endangered Species Act (Title 14 California Code of Regulations 670.5).

¹⁴ Plants listed as rare under the California Native Plant Protection Act (California Fish and Game Code Section 1900 et seq.).

¹⁵ California Department of Fish and Wildlife. 2023. California Natural Diversity Database. Database search for 9-quads. Generated June 28, 2023.

¹⁶ California Native Plant Society. 2023. Inventory of Rare and Endangered Plants (online edition, v8-03 0.39). Sacramento, CA. Available at <http://www.rareplants.cnps.org/>. Accessed June 28, 2023.

¹⁷ U.S. Fish and Wildlife Service. 2023. Information for Planning and Conservation. Available at <https://ecos.fws.gov/ipac/>. Accessed June 26, 2023.

species that coincide with the BSA, and none of these species were observed during the 2022-2023 field surveys. Because the blooming periods of these species either did not coincide with or only partially coincided with the timing of these field surveys, additional surveys were conducted in 2025 (see discussion below).

During the various field surveys, native shrub and tree species protected under the City of Los Angeles Native Tree Protection Ordinance were observed. This includes Toyon (*Heteromeles arbutifolia*), Mexican (or blue) elderberry (*Sambucus mexicana*), coast live oak (*Quercus agrifolia*), and western sycamore (*Platanus racemosa*). Impacts related to these species are discussed further in Section 3.4(e) below.

Focused Rare Plant Survey

As the blooming periods of the special-status species with moderate potential at the project site to occur did not coincide with or only partially coincided with the timing of the 2022-2023 field surveys, additional protocol-level Rare Plant Surveys were conducted, per CDFW guidelines,¹⁸ to further survey and assess the presence of special-status plant species (as defined by CESA, FESA, and the Native Plant Protection Act [NPPA]). These surveys occurred during the 2025 growing season. The focused surveys encompassed the project site boundaries plus a 100-foot buffer (rare plant survey area), as shown in Figure 5, and were conducted on May 29, 2025, and July 2, 2025. Based on the results of the literature review and updated database searches of the CNDDDB, CNPS online inventory, and IPaC database, 54 special-status plant species were analyzed for their potential to occur within the study area. Of these, 40 species are not expected to occur due to the absence of suitable habitat or the presence of only marginally suitable habitat that was of moderate quality or disturbed. Additionally, these species are not expected to occur because the study area lacked connectivity to known extant populations, or because it is outside the known elevation range of the species. Of the remaining 14 species, 13 were absent from the study area during the 2025 surveys. One special-status plant species, Coulter's matilija poppy (*Romneya coulteri*), was observed within the study area during the 2025 surveys. Coulter's matilija poppy is not federal or state listed, and it has a California Rare Plant Rank (CRPR) of 4.2, meaning it is a species of limited distribution or infrequent throughout a broader area in California (i.e., watch list species) with a moderate degree and immediacy of threat. A total of 183 individuals covering 0.08 acres were mapped within the rare plant study area, all in the area of the proposed BESS, north of Encino Reservoir.

¹⁸ California Department of Fish and Wildlife. 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities.



Source: Nearmap/Raymore Imagery Service (2025)

ENCINO RESERVOIR FLOATING SOLAR PILOT PROJECT

Rare Plant Survey Area

Figure 5

Construction

Construction activities would include site preparation, including vegetation clearing, grading, leveling, and excavation. Ground-disturbing activities could result in loss of suitable habitat, loss of population, and direct mortality of rare plants. Specifically, vegetation clearing would occur at the existing boat ramp for construction of the temporary floating dock, at the site of the BESS, at the site of the ground-mount solar panels, and for the installation of the conduit between the water and the concrete sidewall. To facilitate construction and deployment of the floating panels, maintenance of the existing boat ramp would include approximately 4,500 square feet of vegetation clearance at the bottom of the ramp. This area includes Goodding's willow and disturbed Goodding's willow, which are not special-status species. Additionally, installation of the conduit may require clearing or trimming vegetation, specifically of Goodding's willow in the area between the water surface and the concrete reservoir sidewall. The level of clearing is unknown at this time as it may be possible to route the conduit through the vegetation; however, it is unlikely that removal of trees would be required. Construction activities for the ground-mount solar panels would likely be limited to previously disturbed flat portions of this area, and no special-status species were present in this area during the field surveys. As discussed, Coulter's matilija poppy was observed during the rare plant surveys in the area of the proposed BESS. Therefore, special-status plant species have the potential to be directly impacted by project activities during vegetation removal. Mitigation Measure BIO-1 would be implemented, which would reduce potential impacts to Coulter's matilija poppy to a less than significant level.

Indirect impacts to special-status plant species occurring outside the project site could result from ground-disturbance resulting in fugitive dust, and erosion and sediment deposition during storms. Implementation of best management practices (BMPs) including standard construction practices related to fugitive dust (e.g., implementation of Rule 403 measures required by the SCAQMD) and a project-specific BMP plan that includes erosion and sediment controls, as required by LADWP standard construction procedures, would reduce the potential for indirect impacts to less than significant.

Operation

Operation of the proposed project would include maintenance of the floating and ground-mount solar panels and BESS. Additionally, periodic cleaning of the floating and ground-mount solar panels would be required to clear the panels of debris. To access the floating solar panels, the area around the bottom of the boat ramp would need to be permanently maintained to be clear of vegetation; however, as discussed, Goodding's willow and disturbed Goodding's willow are not special-status species. Maintenance of the ground-mount solar panels and BESS would occur in previously disturbed areas. As operational and maintenance activities would be conducted within paved roadways or previously disturbed areas that would not result in new impacts to special-status plant species, impacts during operation would be less than significant.

Special-Status Wildlife Species

Special-status wildlife species include those listed by USFWS under FESA and by CDFW under CESA. USFWS and CDFW officially list species as threatened, rare, endangered, or as candidates for listing. Additional species receive federal protection under the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act (MBTA), and state protection under CEQA Section 15380(d).

Bats are afforded protections under various regulations (e.g., Title 14, Section 251.1 of the

California Code of Regulations and California Fish and Game Code [CFGF] Section 4150), and are classified as indigenous nongame mammal species, regardless of status under the CESA or the FESA.

A total of 53 wildlife species were identified from the CNDDDB search of the Canoga Park and surrounding eight quadrangles (an area of approximately 500 square land miles, extending up to 20 linear miles from the project site), as well as an IPaC search of the project vicinity. Of the 53 wildlife species, 18 were federal and/or State-listed wildlife species. No records of special-status wildlife species coincide with the BSA. Two special-status species, yellow warbler (*Setophaga petechia*) and coastal whiptail (*Aspidoscelis tigris stejnegeri*), were observed during the June 2023 biological field survey. Both species were detected within the riparian area adjacent to the reservoir. Additionally, based on an assessment of habitat present within the BSA and nearby regional CNDDDB records, several wildlife species have medium to high potential to occur on-site. Wildlife species that have high potential to occur on-site include the Crotch's bumble bee (*Bombus crotchii*) and western red bat (*Lasiurus blossevillii*); species with moderate potential to occur include the least bell's vireo (*Vireo bellii pusillus*; LBVI), and two-striped gartersnake (*Thamnophis hammondi*). No USFWS-designated Critical Habitat for special-status wildlife species coincides with the BSA.

Least Bell's Vireo Protocol Surveys

As discussed above, LBVI has a moderate potential to occur within the BSA. As a result, protocol LBVI surveys, which followed the guidelines described in the USFWS protocol Least Bell's Vireo Survey Guidelines,¹⁹ were conducted for the project during the 2025 field season. Surveys were conducted on April 21, May 1, May 16, May 29, June 9, June 20, July 2, and July 14 of 2025 in suitable habitat, including Goodding's willow – red willow riparian woodland forest (*Salix gooddingii* – *Salix laevigata* Forest and Woodland Alliance, *Salix gooddingii* Association) and disturbed Goodding's willow – red willow riparian woodland forest within the project site and a 500-foot buffer. The survey area consisted of the area around the paved reservoir boat ramp, along the access road in the southwestern portion of the reservoir, and around the proposed ground-mount solar panels, proposed inverters, transformer, and switchgear. Federally designated Critical Habitat for LBVI is not located within or directly adjacent to the survey area. The closest federally designated critical habitat is located 22 miles to the northwest of the project site.

Based on the results of the literature review, no information in the CNDDDB and the eBird database describes LBVI territories within the Encino Reservoir property or immediate vicinity. Recent records document LBVI territories within riparian habitat within a 10-mile radius to the north, east, and south along the coast. The nearest CNDDDB occurrence was documented approximately 6 miles to the northwest of the survey area in 2004 and numerous eBird sightings from 2.5 miles to the northeast of the Encino Reservoir property. No LBVI were detected over the course of the eight protocol surveys conducted during the 2025 field season. Based on the survey results, LBVI is considered absent from within, or in areas directly adjacent to, the project site.

Additionally, a total of 60 wildlife species were detected during the LBVI protocol surveys including one amphibian, three reptiles, 54 birds, and four mammals (refer to Attachment C of Appendix E, Results of Least Bell's Vireo Protocol Surveys Memorandum). No special-status

¹⁹ U.S. Fish and Wildlife Service. 2001. Least Bell's Vireo Survey Guidelines.

species were detected during the surveys.

Construction

The proposed project would require vegetation removal (including tree removal), which could remove habitat for special-status wildlife species, or result in the mortality or injury of wildlife species. Indirect impacts to wildlife, including impacts to nesting birds, within the project site could occur as a result of increased dust, noise, human presence, and vibration resulting from construction activities.

Specifically, vegetation removal would occur at the existing boat ramp for construction of the temporary floating dock, at the site of the BESS, at the site of the ground-mount solar panels, and for the installation of the conduit between the open water and the concrete reservoir sidewalls. To facilitate construction and deployment of the floating panels, approximately 4,500 square feet of vegetation clearance, including Goodding's willow and disturbed Goodding's willow, would be cleared. This area is suitable habitat for LBVI. Additionally, installation of the conduit may require clearing or trimming vegetation, specifically of Goodding's willow. The level of clearing is unknown at this time as it may be possible to route the conduit through the vegetation; however, it is unlikely that removal of trees would be required. Construction activities for the ground-mount solar panels would likely be limited to previously disturbed flat portions of this area, which does not serve as habitat for special-status wildlife species. Although LBVI is considered absent from the project site, due to the potential to remove LBVI habitat (i.e., Goodding's willow) during construction, the proposed project would implement Mitigation Measure BIO-2 to conduct a pre-construction survey for LBVI prior to removal of Goodding's willow. Should LBVI be present, a consultation with CDFW would be required and a project-specific Mitigation and Monitoring Plan would be prepared. With implementation of Mitigation Measure BIO-2, impacts to LBVI would be less than significant.

Disturbances related to construction could result in increased nestling mortality for birds protected under the MBTA and CFGC due to nest abandonment or decreased feeding frequency. Therefore, the proposed project would implement Mitigation Measure BIO-3 to conduct pre-construction nesting bird surveys. Should a nesting bird be present, a qualified biologist would monitor the nest, potentially implement a net avoidance buffer zone, and implement adaptive measures to reduce disturbances. With implementation of Mitigation Measure BIO-3, impacts to nesting birds would be less than significant.

Two listed special-status species, yellow warbler and coastal whiptail, were observed during the June 2023 field survey within the riparian area adjacent to the reservoir, and have the potential to be impacted by construction activities. Additionally, two non-listed special-status wildlife species, two striped garter snake and western red bat, have a moderate and high potential to occur on-site, and have the potential to be impacted by construction activities. Direct and indirect impacts to yellow warbler would be reduced to less than significant with the implementation of Mitigation Measure BIO-3, which would require a pre-construction nesting bird survey and coordination with regulatory agencies if an active nest for yellow warbler is detected. Impacts to two-striped garter snake and coastal whiptail would be reduced to less than significant with implementation of Mitigation Measure BIO-4, which would require a pre-construction wildlife survey prior to vegetation removal by a qualified biologist. If these species, or any other special-status species, are detected within the construction area during the pre-construction survey, the qualified biologist would relocate or flush the individual out of the work area. Direct and indirect impacts to the western red bat would be reduced to less than significant levels with implementation of Mitigation Measure BIO-5, which would require tree

removal activities to be performed outside of the bat maternity season or require monitoring by a qualified biologist if the maternity season cannot be avoided.

Additionally, based on an assessment of habitat present within the BSA, one State-candidate endangered species, Crotch's bumble bee, has potential to occur in the BSA. Vegetation removal could remove habitat for this species, or result in the mortality or injury of this species. Therefore, the proposed project would implement Mitigation Measure BIO-6 to conduct focused surveys during the flight period for the species to determine the presence of Crotch's bumble bee. As bumble bees move nests sites each year, the surveys would be conducted prior to construction starting in 2026.

With implementation of Mitigation Measures BIO-2 through BIO-6, construction impacts to special status wildlife species would be less than significant.

Operation

As discussed, operation of the proposed project would include maintenance of the floating and ground-mount solar panels and BESS. Additionally, periodic cleaning of the floating and ground-mount solar panels would be required to clear the panels of debris. To access the floating solar panels for maintenance, the area around the bottom of the boat ramp would need to remain clear of vegetation permanently such that Goodding's willow would not reestablish in the cleared area and no suitable habitat for LBVI would be available in that area. Maintenance of the ground-mount solar panels and BESS would occur in previously disturbed areas that do not contain suitable habitat for special-status wildlife species. No maintenance would be required in the pathway of the conduit, and operational impacts to habitat (i.e., Goodding's willow) for special-status species related to the conduit would not occur.

The floating solar panels would cover approximately 10 acres of the 130-acre Encino Reservoir water surface. The floating solar panels would be located in the southwest portion of the reservoir in an area that is on the periphery of the main waterbody. Thus, birds using the reservoir would still have access to most of the water surface. Additionally, no change would occur to most of the landside areas immediately surrounding the reservoir. Therefore, it is anticipated that birds would not be substantially impacted by installation by the floating solar panels.

Mitigation Measures

- BIO-1** If it is determined upon final design that the proposed BESS would require removal of Coulter's matilija poppy, LADWP or its contractor shall replant the Coulter's matilija poppy at a 1:1 ratio in a suitable area, identified by a qualified botanist, within the Encino Reservoir property. Replanting shall be guided by a habitat management and monitoring plan prepared by a qualified botanist. The plan shall set forth success criteria (e.g., requiring at least a certain percent survival of transplanted individuals after three years, invasive weed control, irrigation or watering as needed during establishment, and protection of the site from disturbance), long-term maintenance provisions, and monitoring/reporting requirements to ensure the plan's success.
- BIO-2** Prior to the vegetation clearing, a follow-up pre-construction survey shall be required to confirm the absence of LBVI. If LBVI are detected, consultation with CDFW would be required prior to initiating any vegetation clearing. A project-specific Mitigation and Monitoring Plan shall be prepared and may include the avoidance of removing

vegetation during the nesting season for LBVI and/or in-kind restoration of suitable habitat, if determined feasible and viable.

BIO-3 To avoid and minimize project-related impacts to special-status birds and nesting birds, project construction activities shall avoid, if possible, the nesting bird season (which generally occurs February 1 through September 1, and as early as January for raptors). If the nesting bird season cannot be avoided, the following measures shall be employed to avoid and minimize impacts to special-status birds and nesting birds protected under the MBTA and CFGC:

- A pre-construction nesting bird survey shall be conducted by a qualified biologist with the necessary skills to identify birds and nesting bird behaviors, within 3 days prior to the start of construction activities to determine whether active nests are present within or directly adjacent to the construction zone. All nests found shall be recorded.
- In the event an active nest is detected, a qualified biologist shall monitor the nest to determine if a nest avoidance buffer zone is necessary to restrict construction activities in proximity to the nest to protect the nest from failing. Any buffer zone, within which construction activities may not occur, shall be established in coordination with the qualified biologist, who shall consider existing baseline conditions (e.g., topography or other buffering). In addition, observed avian response to ambient conditions (e.g., existing noise and human activity) shall factor into the requirement for and size of a nest avoidance buffer.
- The qualified biologist shall monitor all active nests, including those with and without an established buffer, at least once per week to determine whether birds are being disturbed. If signs of disturbance or stress are observed, the qualified biologist shall implement adaptive measures to reduce disturbance. These measures could include establishing or increasing buffer distances or placing visual screens or sound dampening structures between the nest and construction activity until fledging is confirmed. The qualified biologist shall monitor each active nest until it's determined that nestlings have fledged and dispersed, or the nest is no longer active.
- Should an active nest of any federal or State of California (State)-listed bird species be detected during pre-construction surveys or subsequent construction monitoring, construction activity in the immediate area shall not commence or shall cease if already underway, and the applicable federal and/or state agency (USFWS and/or CDFW) shall be notified. Work in other areas of the project site may continue until the active nest has been evaluated.

BIO-4 To avoid and minimize project-related impacts to coastal whiptail, two-striped garter snake, and other wildlife species, prior to vegetation removal, a pre-construction wildlife survey should be conducted by a qualified biologist with the necessary skills to identify coastal whiptail, two-striped garter snake, and other wildlife species. If these species, or any other special-status species, are detected within the construction area, the qualified biologist shall relocate or flush the individual out of the work area.

BIO-5 Foliage-roosting bat species, such as western red bats, may roost in trees, including non-native palms. If mature trees (including palms) are removed or trimmed in

support of project related activities, the following measures shall be implemented to avoid potential mortality to foliage-roosting bat species:

- To the greatest extent practicable, tree trimming/removal activities shall be performed outside of the bat maternity season (April 1 through September 30) to avoid direct impacts to nonvolant (flightless) young bats that may roost in trees. This period also coincides with the bird nesting season of February 1 through September 1. If trimming or removal of trees during the bat maternity season cannot be avoided, a qualified biologist shall monitor the activities to ensure that no direct impacts to bats would occur.
- If bats are determined to be present, avoidance and minimization measures, including the designation of buffers, based upon the particular bat species found, and phased removal of trees, shall be developed and implemented.

BIO-6 To minimize potential impacts to Crotch's bumble bee, the following measures shall be implemented by a qualified biologist. This mitigation measure shall only be required if Crotch's bumble bee remains as a candidate for listing under the CESA or is listed as a state endangered species at the time of project construction. If Crotch's bumble bee is delisted, this mitigation measure shall not be required:

- Prior to construction, a Crotch's bumble bee habitat assessment shall be conducted of the BSA to identify highly abundant nectar/pollen sources most commonly associated with Crotch's bumble bee, to determine where suitable habitat exists. The results of the habitat assessment shall be utilized to inform pre-construction surveys.
- Prior to ground disturbance activities, Crotch's bumble bee surveys (per CDFW guidelines - Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species) shall be conducted in the flight season (February – October) preceding ground-disturbing activities. Surveys shall be conducted in suitable habitat areas, as identified by the habitat assessment, by a qualified biologist. Three rounds of surveys, spaced at least 14 days apart, shall be conducted during the survey period. Surveys will include the identification of potential nest sites and small mammal burrows within and adjacent to the project area. Paved roads, bare ground, open water, and developed areas will be excluded.
- If surveys result in the detection of Crotch's bumble bee, suitable nesting, foraging, and overwintering habitat areas shall be avoided to the extent possible during construction. If an active nest is identified, a minimum 100-foot no disturbance buffer zone will be established around the nest site to prevent incidental take. If it is determined that such habitat cannot be avoided, consultation with CDFW may be required to obtain an Incidental Take Permit (ITP). Additional avoidance and minimization measures would be developed through CDFW consultation prior to the initiation of construction.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant Impact with Mitigation Incorporated. The BSA consists of multiple vegetation communities, including laurel sumac scrub, coast live oak woodland and forest,

sycamore-coast live oak woodland, California buckwheat scrub, southern mixed chaparral, Goodding's willow-red willow riparian woodland and forest, cattail marsh, wild oats-annual brome grassland, and upland mustards. The BSA also includes previously disturbed or developed areas such as the pump station and microfiltration plant building and paved roads. There are slopes with native scrub, coast live oak woodland and forest directly north of the pump station building, and sycamore-coast live oak woodland to the west of the building. The southern portion of the BSA includes previously disturbed areas and areas where non-native grass covers tributary approaches from the south to the reservoir. Native scrub habitat, including the laurel sumac scrub community, covers the upland areas around the reservoir and along the perimeter of disturbed areas, as well as the upper portion of the unsubmerged embankments of the reservoir. Riparian woodland and forest occur mid-slope within the unsubmerged embankments and extend to the water's edge. Marsh habitat with cattail occurs within some submerged areas and extends out into the water.

Sensitive natural communities are those that are designated as rare in the region by the CNDDDB; support special-status plant or wildlife species; or receive regulatory protection (i.e., Section 404 of the Clean Water Act and/or Sections 1600 et seq. of the CFGC). Based on a review of the CNDDDB, a total of 13 sensitive vegetative communities have been recorded within the Canoga Park quadrangle and surrounding eight quadrangles. Three sensitive natural communities occur within the BSA. The southern mixed riparian forest, which is also known as Goodding's willow-red willow riparian woodland and forest, occurs on the mid and lower embankments of the reservoir. Two other sensitive natural communities, coast live oak woodland and forest and sycamore-coast live oak woodland, occur adjacent to the pump station building. Based on an analysis of historical aerial photography, the sycamore-coast live oak woodland do not appear to be naturally-occurring (i.e., they were planted) as the area west of the pump station building lacks the riparian habitat required for this species.

Construction

The Goodding's willow-red willow riparian woodland and forest community has the potential to be impacted during vegetation removal around the existing boat ramp required for construction of the temporary floating dock and the installation of the conduit on the reservoir slope. Approximately 4,500 square feet of vegetation clearance of Goodding's willow would be required at the bottom of the ramp. Installation of the conduit may require clearing or trimming of Goodding's willow along the reservoir slope. The level of clearing for the conduit is unknown at this time as it may be possible to route the conduit through the vegetation; however, it is unlikely that removal of trees would be required. Additionally, indirect impacts to riparian habitat could occur through fugitive dust, erosion, and sediment deposition as a result of ground disturbing activities. Therefore, the proposed project would implement Mitigation Measure BIO-7, which would require coordination with other applicable regulatory permitting agencies, biological monitoring, and limiting all construction activities to approved work areas to protect riparian habitat and other sensitive natural communities. Further, as discussed in Section 3.4(a), standard construction BMPs, which would require dust control and erosion and sedimentation measures, would be implemented to minimize indirect impacts during construction.

With implementation of Mitigation Measure BIO-7, the potential for impacts to riparian habitat and other sensitive natural communities in the BSA would be less than significant.

Operation

Operation of the proposed project would include maintenance of the floating and ground-mount

solar panels and BESS. Additionally, periodic cleaning of the floating and ground-mount solar panels would be required to clear the panels of debris. To access the floating solar panels for maintenance, the area around the bottom of the boat ramp would need to be permanently kept clear of vegetation such that Goodding's willow would not reestablish in the cleared area. No maintenance would be required in the pathway of the conduit, and operational impacts to riparian habitat and other sensitive natural communities related to the conduit would not occur. Therefore, operational impacts would be less than significant.

Mitigation Measure

BIO-7 To avoid and minimize project-related impacts to riparian habitat and other sensitive natural communities, if the previous jurisdictional delineation does not cover all of the expected work areas and would extend outside of the survey area, a follow-up focused jurisdictional delineation outside of the survey area shall be conducted prior to the start of construction. The jurisdictional delineation report will incorporate updated regulatory guidance. For aquatic resources that are determined to be jurisdictional to the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife, the project shall coordinate with these agencies and prepare/obtain regulatory permits and adhere to permit conditions.

The following measures shall also be implemented:

1. A qualified biologist/aquatic monitor shall be present on a daily basis to monitor construction activities adjacent to jurisdictional resources, and support impact avoidance and minimization measures detailed in permits and approvals, if required.
2. All equipment and workers shall remain within approved work limits. Work limits shall be designated with lathe staking or a similar method.
3. Equipment and materials shall be staged within the approved work limits and away from jurisdictional resources. Parked equipment shall have secondary containment to prevent any fluid leaks from coming into contact with the ground surface. Any hazardous waste spills shall be immediately cleaned up and reported.
4. Wherever possible, construction personnel shall utilize existing access roads or previously disturbed areas to reach projects area or stage their vehicles and equipment.

c) Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Less Than Significant Impact with Mitigation Incorporated. Encino Reservoir is considered potential protected lake habitat with potential freshwater forested/shrub wetland habitats that occur along the southwestern portion of the reservoir. Jurisdictional resources occur within the BSA, including Encino Reservoir and several freshwater forested/shrub wetland, freshwater emergent wetland, and riverine habitats.

The Jurisdictional Delineation Report (Appendix C) prepared for the project provided baseline data for jurisdictional resources that occur within the BSA. Jurisdictional resources include

wetlands and non-wetland “waters of the United States” (WOTUS) regulated by the U.S. Army Corps of Engineers (USACE); “waters of the State” regulated by the Regional Water Quality Control Board (RWQCB); and the bed, bank, and channel of all lakes, rivers, and/or streams (and associated riparian vegetation), as regulated by CDFW. Several sources of information were reviewed for the report, including the USGS’ Canoga Park 7.5-minute topographic quadrangle map; aerial photography; soil data; the National Wetlands Inventory’s Wetland Mapper; and the Water Quality Control Plan for the Los Angeles Region. Field surveys were conducted on October 28, 2021 and March 29, 2022, to delineate jurisdictional features.

Based on the jurisdictional delineation field work conducted for the BSA, approximately 133 acres of RWQCB “waters of the State” and 180 acres of CDFW jurisdictional waters are present, primarily within Encino Reservoir. None of the resources within the BSA are likely to be considered WOTUS by the USACE, as water reservoirs are typically not considered to be WOTUS, the reservoir does not support any commercial or recreational navigation, and the reservoir does not discharge flows to downstream waters. As the project would not require any dredging or filling to the reservoir and the reservoir would not be considered WOTUS, no impacts to WOTUS regulated by the USACE would occur. Further, based on the lack of hydric soils and the limited presence of hydrophytic vegetation, no wetland conditions were detected within the BSA.

The installation of the floating solar panels within Encino Reservoir would not likely be considered a discharge of “waste” (as defined in the California Water Code) and would not be expected to negatively affect water quality within the reservoir. Installation of the floating solar panels would also not likely affect any Beneficial Uses for the reservoir (i.e., Municipal Water Supply, Industrial Service Supply, Industrial Processing Supply, Warm Freshwater Habitat, Wildlife Habitat, Limited Water Contact Recreation, Non-Contact Water Recreation). As previously stated, the reservoir was taken out of service as a potable water source in 2002 after the completion of the construction of new water supply trunk lines that enhanced water quality and reliability in the reservoir service area. The pump station adjacent to the reservoir continues to operate, while Encino Reservoir has remained out of service since it was taken offline. The floating solar panels would not substantially change the reservoir’s bed or bank. Therefore, the installation of the solar panels would not result in adverse impacts to RWQCB “waters of the State” or CDFW jurisdictional waters.

Overall project construction activities requiring vegetation clearing and ground disturbing activities would potentially impact riparian vegetation and aquatic habitat within the BSA, specifically ephemeral channels and drainages that are under the jurisdiction of the RWQCB and CDFW. The proposed project would require permits, including a RWQCB Report of Waste Discharge and a CDFW Notification of Lake or Streambed Alteration. Further, the project would implement Mitigation Measure BIO-7, as described above, which would require necessary permits, monitoring, and minimization measures to protect the jurisdictional resources within the BSA. The project would also implement standard construction BMPs (e.g., SCAQMD Rule 403 and project-specific BMP plan) to minimize impacts related to stormwater runoff or conveyance of sediment or other contaminants into the reservoir. Therefore, through implementation of BMPs and Mitigation Measure BIO-7 to obtain approval for required permits, impacts would be less than significant.

d) Would the project 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?

Less Than Significant Impact with Mitigation Incorporated. In an urban context, a wildlife migration corridor can be defined as a linear landscape feature of sufficient width and buffer to allow animal movement between two comparatively undisturbed habitat fragments, or between a habitat fragment and some vital resource that encourages population growth and diversity. Habitat fragments are isolated patches of habitat separated by otherwise foreign or inhospitable areas, such as urban tracts or highways. Two types of wildlife migration corridors seen in urban settings are regional corridors, defined as those linking two or more large areas of natural open space, and local corridors, defined as those allowing resident wildlife to access critical resources (food, cover, and water) in a smaller area that might otherwise be isolated by urban development.

The Encino Reservoir property is approximately 960 acres and is partially secured by fences and gates. The property is generally bound by single-family residences to the north, west, and east, and the Santa Monica Mountains to the south, which includes a large natural habitat area. Although the Encino Reservoir property is located within the Santa Monica Mountains Significant Ecological Area as designated Los Angeles County's General Plan Conservation/Open Space Element, it is located at the northeastern edge of the designated Significant Ecological Area, and does not occur within or intersect with a recognized/established regional wildlife corridor.^{20, 21} Additionally, the Significant Ecological Area Program and associated regulations apply only to unincorporated areas of Los Angeles County; therefore, the program is not applicable to the proposed project as the Encino Reservoir property is located within the limits of the City of Los Angeles, an incorporated city.

Trees and shrubs within and adjacent to the project component areas provide some opportunities for cover, resting, foraging, and nesting to localized bird populations; however, they do not provide functions as a significant wildlife movement corridor. Additionally, Encino Reservoir is a manmade water body that does not connect to another body of water or waterway, so it does not serve as a wildlife corridor for fish or other aquatic species. As discussed above in Section 3.4(a), the proposed project would implement Mitigation Measure BIO-3 to minimize potential impacts to migratory birds and Mitigation Measure BIO-5 to minimize impacts related to the western red bat. Therefore, with implementation of Mitigation Measures BIO-2 and BIO-5, impacts would be less than significant.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less Than Significant Impact with Mitigation Incorporated. Native tree species protected under the City's Native Tree Protection Ordinance (Ordinance No. 177404) include oak trees indigenous to California including valley oak (*Quercus lobata*) and coast live oak (*Quercus agrifolia*) but excluding scrub oak (*Quercus berberidifolia*); southern California black walnut (*Juglans californica*); western sycamore (*Platanus racemosa*); and California bay (*Umbellularia californica*) (Section 17.02 of City of Los Angeles Municipal Code). In December 2020, the City approved Ordinance No. 186873 and added two native shrub species, Mexican elderberry

²⁰ Los Angeles County Planning. January 2020. SEA Ordinance Implementation Guide. General Plan SEA Policy Map (Figure 9.2 and 9.3).

²¹ Los Angeles County Planning. April 2025. General Plan 2035, Chapter 9: Conservation and Natural Resources Element (Figures 9.2 and 9.3).

(*Sambucus mexicana*) and Toyon (*Heteromeles arbutifolia*) to the class of protected trees and shrubs. Under the City Ordinances, trees and shrubs must be four inches or greater in diameter at 4.5 feet above ground to be considered protected. The City's Board of Public Works must issue a permit before any alterations to protected trees are made that could cause them to be damaged, relocated, or removed. Pursuant to the ordinance, native trees that were planted or grown as part of a tree planting program are not "Protected Trees."

Based on the 2022-2023 field surveys, the BSA includes toyon and Mexican elderberry shrubs, sycamore-coast live oak trees, and coast-live oak trees, which are protected species under the City of Los Angeles Protected Tree and Shrub Ordinance. The sycamore-coast live oak trees do not appear naturally-occurring (i.e., they were planted), and thus they are not protected under the City's ordinance. The toyon and blue elderberry shrubs are present near the southwestern portion of Encino Reservoir, near the location of the proposed ground-mount solar and associated equipment and may be impacted by construction activities. Therefore, LADWP would implement Mitigation Measure BIO-8 to conduct a focused tree survey and establish tree protection zones to minimize impacts to protected trees and shrubs. In the event that removal of a protected tree or shrub species cannot be avoided during construction or operational activities, LADWP would be required to submit a Protected Tree and Shrub Report and Tree Removal Permit Application to the City prior to construction. With the implementation of Mitigation Measure BIO-8, impacts related to local policies or ordinances protecting biological resources would be less than significant.

Mitigation Measure

BIO-8 To minimize or avoid project-related impacts to protected trees and shrubs, LADWP or its contractor shall:

- Conduct a focused tree survey prior to beginning work. A consulting arborist shall identify any protected trees or shrubs within the project work areas and determine if there are trees present that require additional protection.
- Establish a Tree Protection Zone by erecting temporary fences in an "environmentally sensitive manner" to protect trees that are determined to require preservation. Fence installation via an environmentally sensitive manner includes minimizing impacts to the surrounding habitat and vegetation during construction of the fence. Fences are to remain until all site work has been completed.
- In the event that removal of a protected tree or shrub species cannot be avoided during construction or operational activities, LADWP shall submit a Protected Tree and Shrub Report and Tree Removal Permit Application to the City prior to construction.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. No adopted Habitat Conservation or Natural Community Conservation Plans coincide with the boundaries of the project site.²² The project site is located within a Significant

²² California Department of Fish and Wildlife. August 2023. Natural Community Conservation Plans, Map. Available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inlinehttps://wildlife.ca.gov/Conservation/Planning/NCCP/Plans/>.

Ecological Area as designated Los Angeles County's General Plan Conservation/Open Space Element. However, the Significant Ecological Area program only applies to unincorporated areas of Los Angeles County, so it would not apply to the project site, which is located in an incorporated area of Los Angeles County.²³ Therefore, no impact would occur.

²³ Los Angeles County Planning. January 2020. SEA Ordinance Implementation Guide.

3.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

Potential impacts related to cultural resources resulting from implementation of the proposed project were determined from the results presented in the Cultural Resources Technical Memorandum, which is included as Appendix F to this IS/MND.

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

No Impact. CEQA Section 15064.5 states that historical resources are “any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource.” In addition, “a resource is ‘historically significant’ if the resource meets the criteria for listing on the California Register of Historical Resources (CRHR) and:

- (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; or
- (D) Has yielded, or may be likely to yield, information important in prehistory or history.”

A cultural resource determined to meet one or more of the above criteria is considered a historical resource under CEQA. In addition, historical resources eligible for listing in the CRHR must retain enough of their historic character or appearance to be able to convey the reasons for their significance. Such integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association.

A records search was conducted at the South Central Coastal Information Center (SCCIC), which focused on the identification of previously recorded cultural resources within a 0.5-mile radius of the project site. The archival research included review of previously recorded archaeological site records and reports; built environment site records, inventories, and reports; and historic maps. The National Register of Historic Places (NRHP) and CRHR, California State

Historic Resources Inventory, California Historical Landmarks and Points of Interest, and the list of Los Angeles Historic-Cultural Monuments (LAHCM) were also reviewed to identify known cultural resources within a 0.5-mile radius of the Encino Reservoir property. The SCCIC records search revealed that nine cultural resource studies have taken place within the 0.5-mile records search radius, with four studies that overlap portions of the Encino Reservoir property. The SCCIC records search identified one previously recorded prehistoric archaeological resource within the Encino Reservoir property. Additionally, two previously recorded archaeological resources were documented within one mile of the Encino Reservoir property. No previously recorded built environment resources are located within the 0.5-mile radius of the Encino Reservoir property.

Additionally, a built environment survey was conducted on July 27, 2023, to identify and evaluate any potentially historic built environment resources within the project site. Encino Reservoir was identified as a historic-age resource within the project site and evaluated against the criteria for listing in the NRHP, CRHR, and LAHCM. The entire Encino Reservoir property includes an earthen fill dam with a concrete crest, five concrete slopes, an emergency spillway, the outlet tower, the outlet chlorination station, a boat dock, an asphalt perimeter access road, caretakers residence (with garage, carport, and landscape features), the Dike No. 1 Drain Shaft (with associated structures), a testing facility, and the Encino Filtration Plant. Of these components, only one of the concrete slopes, where electrical conduit would be placed on the surface, would be involved in the proposed project.

As evaluated in the Cultural Resources Technical Memorandum, Encino Reservoir does not distinctively reflect significant trends in community planning relating to the expansion of publicly owned utilities to provide water services to a city growing in both area and population, and as such, does not meet CRHR Criterion 1. Encino Reservoir is not significant for any associations with the lives of persons important to history, and thus, does not meet CRHR Criterion 2. Encino Reservoir is not significant because it is not an important example of a type, period, or method of construction; the reservoir involves typical design, materials, and construction methods. Therefore, Encino Reservoir does not meet CRHR Criterion 3. Lastly, Encino Reservoir is not significant as a source (or likely source) of important information regarding history, as it does not appear to have any likelihood of yielding important information about historic construction materials or technologies, and thus, does not meet CRHR Criterion 4. Therefore, Encino Reservoir was determined ineligible for listing in the NRHP and CRHR.

Encino Reservoir was also evaluated against the criteria for listing as an LAHCM, and it did not meet any of the LAHCM criteria. In addition to Encino Reservoir's lack of significance, it does not retain historic integrity. While the reservoir has integrity of location, setting, feeling, and association, the additional periods of construction and expansion represent a loss of integrity of design, workmanship, and materials of the original 1924 reservoir structures. Encino Reservoir, therefore, is not eligible for listing in the NRHP, CRHR, or the local register.

As such, there are no historical resources identified on the project site, and no impact would occur.

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

Less Than Significant Impact with Mitigation Incorporated. As discussed in Section 3.5(a), one prehistoric archaeological resource was identified within the Encino Reservoir property, but has not been previously evaluated for NRHP eligibility. This resource would not be impacted by

project activities. Two additional archaeological resources located outside of the project area were identified, and would not be impacted by project activities.

An archaeological survey of the project site was conducted on July 27, 2023. In the area of the proposed floating solar panels and ground-mount solar and associated equipment, the survey revealed that the area was likely heavily disturbed during the construction and maintenance activities associated with the reservoir, though some native soils may be present. No archaeological resources were observed in this survey area. In the area of the proposed BESS and laydown area, the survey revealed that the area has been subject to landscaping and vegetation maintenance. No archaeological material was observed.

While no archaeological material was observed during the survey conducted for the proposed project, archival research and the field survey indicate the project area has moderate sensitivity for archaeological resources. Specifically, due to the low visibility during the field survey for the project site for the proposed ground-mount solar and associated equipment, the potential to inadvertently discover previously unrecorded archaeological resources during project construction activities exists, which could result in a potentially significant impact. Therefore, the proposed project would implement Mitigation Measures CUL-1 and CUL-2 for a cultural resources awareness training and management plan, and stop work procedures in case of inadvertent discovery. With implementation of Mitigation Measures CUL-1 and CUL-2, impacts to archaeological resources would be less than significant.

Mitigation Measures

CUL-1 Cultural Resources Awareness Training and Management Plan

All field supervisors and construction workers shall participate in cultural resources awareness training provided by the LADWP environmental project manager prior to the initiation of project construction on project sites that involve ground-disturbing activities. The training shall include a description of the types of cultural resources (including tribal cultural resources and human remains) that could inadvertently be encountered during ground-disturbing activities, the sensitivity of the resources, the legal basis for protection of the resources, and the penalties for unauthorized collection of or knowingly damaging the resources. The training shall address the proper procedures in the event of an inadvertent discovery of a cultural resource, including the immediate halting of work in the area of the discovery, notification of appropriate individuals of the discovery, the establishment of appropriate protective buffer zones around the discovery, and the continued avoidance of the protected area until the resource has been evaluated by qualified individuals and an appropriate treatment plan has been developed and implemented. These procedures shall be documented in a cultural resources monitoring plan (CRMP) that shall establish, in the event of an inadvertent discovery of cultural resources, monitoring procedures (including applicable archaeological and/or tribal monitors), notification procedures, key staff, and preliminary treatment measures for potential discoveries. The CRMP shall be written to ensure compliance with appropriate state and federal laws. The training presentation and CRMP shall be available to additional supervisory or construction personnel who may join after project construction has begun.

CUL-2 Inadvertent Discovery

In the event that cultural resources are inadvertently discovered during project activities, all construction work occurring within 100 feet of the find shall cease and a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology shall assess the find. Construction activities may continue in other areas, or use existing paths of travel, but should be redirected a safe distance from the find. Consulting tribes shall be contacted about any pre-contact and/or post-contact finds and be provided information after the archaeologist makes their initial assessment of the nature of the find, to provide Tribal input where appropriate with regards to significance and treatment.

c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant There are no cemeteries or known burial grounds located within the project site. Based on the results of the archival research, there is moderate potential that archaeological resources would be encountered during ground-disturbing activities for the proposed project. However, the proposed project would involve shallow depths of excavation up to 18 inches. Thus, the likelihood of encountering undisturbed soils that may contain human remains is considered highly unlikely.

While not expected to occur, in the event that human remains are discovered, in accordance with Section 7050.5 of the California Health and Safety Code, the County Coroner shall be immediately notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the California Native American Heritage Commission in Sacramento within 24 hours. In accordance with California PRC 5097.98, the Native American Heritage Commission must immediately notify the person or persons it believes to be the Most Likely Descendant (MLD) from the deceased Native American. The MLD shall complete inspection and make recommendations for the treatment and disposition, in consultation with LADWP, of the human remains within 48 hours of being granted access to the site. With compliance to existing regulations, impacts would be less than significant.

3.6 Energy

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

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

Less Than Significant Impact. As described in Chapter 1, Project Description, construction of the proposed project is anticipated to begin in July 2026 and would last until July 2027. LADWP and its contractors selected to construct the proposed project would be required to comply with state, regional, and local regulations and policies applicable to off-road equipment and on-road vehicles. Aspects of these requirements that are relevant to energy resources include, but are not limited to:

- Airborne Toxic Control Measure (Title 13, California Code of Regulations § 2485): Diesel-fueled commercial motor vehicles with gross vehicle ratings greater than 10,000 pounds that are licensed to operate on highways shall not idle for more than five minutes at any location.
- In-Use Off-Road Diesel-Fueled Fleets [Title 13, California Code of Regulations § 2449(d)(2): All self-propelled off-road diesel vehicles 25 horsepower or greater must limit idling to five minutes.

Construction of the proposed project may require electricity for the operation of electrically powered tools and equipment. Electricity to the site would be provided by LADWP, and it is anticipated that the source of electricity would be a connection to the existing grid. Consumption of electricity for construction would be relatively minimal and would cease after completion of construction for the proposed project. Construction activities would not require the use of natural gas to power equipment or heavy machinery. Construction of the proposed project would involve off-road construction equipment use, on-road heavy-duty truck trips to deliver materials to the site, and on-road vehicle trips associated with construction crew trips to and from the construction site. Operation of these off-road equipment and on-road vehicles would consume petroleum-based fossil fuels (i.e., diesel and motor gasoline). A maximum of ten construction crew members would be commuting to and from the site on a daily basis during each phase. Construction activities would require a total of approximately 100 truck trips. Equipment required to construct the proposed project includes dozers, graders, excavators, cranes, forklifts, concrete mixers, loader/backhoes, and barges/workboats. In 2023, approximately 2,694 million gallons of gasoline was sold in the City of Los Angeles; construction of the proposed project would represent a nominal percentage of this fuel consumption. This temporary fuel consumption would not strain existing refined petroleum fuels availability. Through maintaining

construction equipment in optimal operating conditions and limiting equipment idling in accordance with state regulations, construction of the proposed project would minimize its expenditure of non-renewable energy resources. Therefore, construction impacts would be less than significant.

During operation, the proposed project would generate onsite renewable energy for LADWP and would support State and City goals to reduce reliance on carbon-emitting energy sources. The proposed project is estimated to generate approximately 10,280 MWh of clean, renewable energy annually. The energy produced from this installation is the equivalent of serving approximately 2,677 homes per year, offsetting 2,854 MTCO₂e per year, and eliminating 671 cars from the road per year. Therefore, the proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during operation, and impacts would be less than significant.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Impact. The State of California has enacted a series of regulations that are directed towards reducing reliance on nonrenewable energy resources and facilitating the expansion of energy supply derived from renewable alternatives. In consideration of these regulatory actions, LADWP developed its 2022 Strategic Long-Term Resource Plan to meet the targets promulgated by the statewide regulatory actions, which include a 60 percent renewable energy supply by 2030 and a carbon-neutral energy supply by 2045 as established by the adoption of Senate Bill 100 in 2018. As of 2022, 35.6 percent of LADWP's electricity supply was derived from renewable resources. The 2022 Strategic Long-Term Resource Plan case scenarios were developed to go beyond the requirements of Senate Bill 100 and achieve an 80-percent renewable electricity generation portfolio by 2030 and carbon-free generation by 2035.²⁴ The purpose of the proposed project is to test the efficacy and efficiency of floating solar panels as a pilot project, which, if viable, would create an opportunity to increase renewable energy generation in the LADWP system. The proposed project is estimated to generate approximately 10,280 MWh of clean, renewable energy annually. The energy produced from this installation is the equivalent of serving approximately 2,677 homes per year, offsetting 2,854 MTCO₂e per year, and eliminating 671 cars from the road per year. Thus, implementation of the proposed project would enhance the reliability and durability of LADWP's electric utility infrastructure and would not interfere with implementation of the 2022 Strategic Long-Term Resource Plan. Therefore, the proposed project would not conflict with or obstruct any actionable regulation pertaining to energy efficiency or renewable energy, and no impact would occur.

²⁴ Los Angeles Department of Water and Power. 2022. 2022 Power Strategic Long-Term Resource Plan.

3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a) **Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**

- i. **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

No Impact. The project site is not located within an Alquist-Priolo Earthquake Fault Zone. The nearest Alquist-Priolo Earthquake Fault Zone is the Santa Monica fault zone, located

approximately 7 miles south of the project site.²⁵ Several other faults are located near the project site, including an unnamed fault, approximately 6 miles east of the project site in North Hollywood and the Northridge Hills fault, approximately 6.4 miles north of the project site.²⁶ The proposed project components would be designed and constructed in compliance with the latest version of the City of Los Angeles Building Code and other applicable local, state, and federal codes to minimize impacts related to fault rupture. Furthermore, there would be no occupied facilities related to the project. As required by LADWP standard construction procedures, a site-specific geotechnical assessment for the project site would be prepared prior to construction to provide design recommendations related to seismic criteria. Therefore, there would be no impacts related to potential adverse effects from the rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The project site is located within a seismically active region, and as with all locations in southern California, is potentially subject to strong seismic ground shaking. However, as discussed in Section 3.7(a)(i) above, the proposed project components would be designed and constructed in compliance with the latest version of the City of Los Angeles Building Code and other applicable local, state, and federal codes to minimize impacts related to seismic ground shaking. Furthermore, there would be no occupied facilities related to the proposed project. A site-specific geotechnical assessment for the proposed project would be prepared prior to construction to provide design recommendations related to seismic criteria. Therefore, impacts related to strong seismic ground shaking would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction occurs when loosely packed, water saturated sediments at or near the ground surface lose their strength in response to strong or extended periods of seismic shaking. Liquefied sediments lose strength, in turn causing the failure of adjacent structures. Portions of the project site are located within a mapped liquefaction zone including the locations of the proposed BESS and proposed ground-mount solar panels, inverters, transformer, switchgear, and associated equipment.²⁷ The proposed project components would require a maximum depth of 18 inches of excavation for concrete pads. The depth of groundwater is anticipated to be deeper than 18 inches, and thus the potential impact of liquefaction related to construction of the BESS and ground-mount solar panels would be low. A site-specific geotechnical assessment for the project site would be prepared prior to construction to provide design recommendations related to liquefaction. Therefore, impacts related to liquefaction would be less than significant.

iv. Landslides?

Less Than Significant Impact. Portions of the Encino Reservoir property are located within

²⁵ California Department of Conservation. CGS Seismic Hazards Program: Alquist-Priolo Fault Hazard Zones. Available at: https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/#data_s=id%3AdataSource_4-191d87d69be-layer-20%3A1387. Accessed June 2025.

²⁶ U.S. Geologic Survey. Quaternary Fault and Fold Database of the United States. Interactive Map. Available at: <https://doi.org/10.5066/F7S75FJM>. Accessed February 2025.

²⁷ California Department of Conservation. CGS Earthquake Zones of Required Investigation. <https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/>. Accessed June 2025.

landslide hazard areas.²⁸ However, the project components would not be installed within a landslide hazard area, and implementation of the proposed project would not increase the risk of landslides. Moreover, the proposed project would not include the development of any habitable structures or other facilities that could experience substantial hazards during a landslide. Therefore, impacts would be less than significant.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Construction of the proposed project would require ground disturbance during excavation and grading that could create the potential for erosion to occur. However, during construction, transport of sediments by stormwater runoff and wind would be prevented through implementation of applicable regulations, including Rule 403 dust control measures required by the SCAQMD. Additionally, a project-specific BMP plan that includes erosion and sediment controls, as required by LADWP standard construction procedures, would reduce the amount of sediment and other pollutants from the project site that are discharged in stormwater runoff. With adherence to applicable regulations and implementation of preventative measures, construction impacts associated with soil erosion or the loss of topsoil would be less than significant.

Following construction, the project site would have increased impervious surfaces, which could lead to increased runoff and erosion. However, the increase in impervious surfaces from implementation of the proposed project would be considered nominal compared to the whole of the reservoir property. Additionally, any runoff from implementation of the proposed project would continue to be captured in the catch basins surrounding the reservoir. Therefore, no substantial soil erosion or loss of topsoil during project operations would occur, and the impact would be less than significant.

c) Would the project 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?

Less Than Significant Impact. As discussed in Section 3.7(a)(iv), the project components would not be located in potential landslide hazard areas.²⁹ Therefore, impacts related to landslides would not occur.

Subsidence is the lowering of surface elevation due to the extraction of subsurface fluids, such as groundwater. When groundwater is extracted from aquifers at a rate that exceeds the rate of replenishment, overdraft occurs, which can lead to subsidence. The proposed project would only involve excavation up to 18 inches deep and would not involve groundwater removal. Therefore, impacts related to subsidence would not occur.

Lateral spreading is a type of liquefaction-induced ground failure on mildly sloping ground. As discussed in Section 3.7(a)(iii), the locations of the proposed BESS and ground-mount solar panels, inverters, transformer, switchgear, and associated equipment would be located in liquefaction zones. The proposed project components would require a maximum depth of 18 inches of excavation for concrete pads. The depth of groundwater is anticipated to be deeper than 18 inches, and thus the potential impact of liquefaction related to construction of the BESS and ground-mount solar panels would be low. A site-specific geotechnical assessment for the project site would be prepared prior to construction to provide design recommendations related

²⁸ City of Los Angeles GeoHub. Landslide Zones. Available at: https://geohub.lacity.org/datasets/edc3df12b9d04b6ea0832166e2d3c52c_4/explore?location=34.146024%2C-118.510134%2C15.20. Accessed February 2025.

²⁹ Ibid.

to liquefaction. Therefore, impacts related to unstable soils would be less than significant.

d) Would the project 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?

Less Than Significant Impact. Expansive soils are clay-based soils that tend to expand (increase in volume) as they absorb water and shrink (lessen in volume) as water is drawn away. If soils consist of expansive clays, foundation movement and/or damage can occur. According to the California Department of Conservation, the materials underlying the proposed BESS site is artificial fill, which would be low in clay content, and underlying the proposed ground-mount solar panel and inverters and switchboard site is alluvial fan deposits (Qf), which can vary in clay content. A site-specific geotechnical assessment would be prepared prior to construction to provide project design recommendations related to expansive soils. If expansive soils are encountered, appropriate recommendations to minimize expansion potential would be implemented. Therefore, impacts would be less than significant.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. No septic tanks or alternative wastewater disposal systems are proposed as part of the project. Therefore, no impact would occur.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

No Impact. As discussed in Section 3.7(d), the soils underlying the project components are comprised of artificial fill and alluvial fan deposits. The proposed BESS, ground-mount solar panels, and inverters and switchboard would be mounted to concrete pads that require excavation of soils up to 18 inches deep. Excavation at this depth would be unlikely to encounter paleontological resources. The proposed conduit would be trenched below the perimeter access road; the soils under the road are compacted and previously disturbed from construction of the road. Thus, excavation activities associated with the proposed project are not anticipated to encounter paleontological resources or geologic features.

Although not expected to occur, in the event that previously uncovered paleontological resources are encountered during project construction, the provisions of CEQA Guidelines Section 15064.5(f) would be followed. Accordingly, the construction manager would halt construction activities in the immediate area. LADWP would retain a qualified paleontologist to make an evaluation of the significance and appropriate treatment of the resource. Construction activities may continue on other parts of the construction site while evaluation and treatment of paleontological resources take place, if necessary. Compliance with these existing policies would ensure that the impact to paleontological resources would be less than significant.

3.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

Potential impacts related to greenhouse gas (GHG) emissions associated with the proposed project are based on the information presented in the Greenhouse Gas Emissions Technical Study, which is included as Appendix G to this IS/MND.

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

No Impact. The proposed project would generate GHG emissions during temporary construction activities and long-term operations. Construction of the proposed project is anticipated to begin in July 2026 and last until July 2027, with a total duration of approximately 13 months. CalEEMod was utilized to calculate reasonably conservative estimates of the total GHG emissions that would be generated by off-road equipment, on-site trucks, and vehicles traveling to and from the construction site, including light duty crew vehicles and heavy-duty haul trucks. Table 3-3 presents a summary of the GHG emissions by source type that would be released to the atmosphere through equipment and vehicle exhaust.

Table 3-3: Proposed Project Greenhouse Gas Emissions

Component/Source	Greenhouse Gas Emissions (MTCO ₂ e/year)
CONSTRUCTION	
Off-Road Equipment	666
On-Site Trucks	2.3
Material Hauling Trucks	4.7
Construction Crew Vehicles	43.2
Total	716
OPERATIONS	
30-Year Amortized Annual Construction Emissions	24
On-Site Solar Generation Offset	-2,854
Total	-2,830
SCAQMD Draft Interim Significance Threshold (MTCO ₂ e/year)	3,000
Exceed Threshold?	No

Source: Appendix G: Greenhouse Gas Emissions Technical Study

As shown above, construction activities for implementation of the proposed project would produce a total of approximately 716 MTCO₂e, which equates to 23.9 MTCO₂e per year based on a 30-year amortization schedule, as provided in SCAQMD CEQA Guidance. The proposed project would generate onsite renewable energy for LADWP and would support State and City goals to reduce reliance on carbon-emitting energy sources. The energy produced from the proposed project is the equivalent of serving approximately 2,677 homes per year, offsetting 2,854 MTCO₂e per year, and eliminating 671 cars from the road per year.

The operational analysis accounted for this annual reduction in carbon dioxide emissions. Operations would result in a net reduction of approximately 2,830 MTCO₂e after combining the amortized construction emissions with the operational solar generation offset. The proposed project would result in a net environmental benefit to the City and would not interfere with regional transportation planning strategies to reduce on-road automobile and light-duty truck vehicle miles traveled (VMT) to achieve the Senate Bill 375 SCAG region target of reducing GHG emissions from automobile and light duty truck trips to 19 percent below 2005 levels by 2035. The combined emissions would remain below the most conservative proposed SCAQMD interim threshold of 3,000 MTCO₂e annual emissions. Therefore, there would be no impact related to the generation of GHG from implementation of the proposed project.

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

No Impact. An array of legislative actions, policies, and plans have been promulgated by state, regional, and local jurisdictions with the objective of reducing GHG emissions. In 2008, CARB approved a Climate Change Scoping Plan as required by Assembly Bill 32 and subsequent updates in 2013, 2017, and 2022. Additionally, at the State level, the goal of Executive Order B-30-15 to reduce statewide GHG emissions to 40 percent below 1990 levels by 2030 was adopted by the Legislature in Senate Bill 32 and codified into law. In support of the goal, the State has promulgated a robust framework of laws and strategies to reduce GHG emissions in the Climate Change Scoping Plan. Many of the emission reduction strategies recommend by CARB would serve to reduce the proposed project’s post-2024 emissions level to the extent applicable by law. Many of the emission reduction strategies recommend by CARB would serve to reduce the proposed project’s post-2024 emissions level to the extent applicable by law. The proposed project’s consistency with the Climate Change Scoping Plan is assessed in Table 3-4. As evidenced by the analysis in Table 3-4, the proposed project would be consistent with the 2022 Scoping Plan’s GHG Reduction Objectives/Strategies.

Table 3-4: Proposed Project Consistency with 2022 Scoping Plan

Strategy	Proposed Project Consistency
2022 SCOPING PLAN OBJECTIVES	
<p>GHG Emissions Reductions Relative to SB 32 Target. Reduce statewide GHG emissions to 40 percent below 1990 levels by 2030.</p>	<p>No Conflict. The proposed project would generate additional renewable energy for LADWP. This supports LADWP’s goal to diversify its portfolio of energy sources and achieve 80 percent renewables by 2030 under LA100.</p>

Table 3-4: Proposed Project Consistency with 2022 Scoping Plan

Strategy	Proposed Project Consistency
<p>Smart Growth/VMT. Reduce VMT per capita to 25 percent below 2019 levels by 2030, and 30 percent below 2019 levels by 2045.</p>	<p>No Conflict. The proposed project would not interfere with regional planning initiatives to reduce VMT per capita. The proposed project would not increase LADWP employee VMT per capita relative to existing commuting patterns, and the proposed project components would not affect local traffic circulation patterns or have any effects on the existing roadway network.</p>
<p>Light-duty Vehicle (LDV) Zero Emission Vehicles. By 2035, 100 percent of new LDV sales will be ZEVs.</p>	<p>No Conflict. The proposed project would not interfere with vehicle manufacturing and sales transitioning to exclusively ZEVs by 2035.</p>
<p>Truck ZEVs. By 2040, 100 percent of medium-duty and heavy-duty sales shall be ZEVs.</p>	<p>No Conflict. The proposed project would not interfere with truck manufacturing and sales transitioning to exclusively ZEVs by 2040.</p>
<p>Electricity Generation. Reduce statewide electricity generation sector emissions to 38 MMTCO_{2e} by 2030 and to 30 MMTCO_{2e} by 2035.</p>	<p>No Conflict. The proposed project would generate renewable energy for LADWP. Implementation of the proposed project would support LADWP initiatives to expand its reliance on carbon-free energy resources, which comprised 52 percent of its power portfolio in 2022.</p>

Source: Appendix G: Greenhouse Gas Emissions Technical Study

Regarding regional and local plans to reduce GHG emissions, the proposed project would not conflict with the SCAG 2024–2050 RTP/SCS and would not compromise land use and transportation planning strategies to meet the regional GHG emissions targets for on-road vehicle travel. The proposed project would increase LADWP’s renewable energy generation to the City. The proposed project would not generate a substantial number of vehicle trips, as the facilities would be operated remotely and only require occasional maintenance and service visits by existing LADWP staff. Additionally, the proposed project would not introduce new housing or commercial developments to the area and would not impede regional objectives to improve efficient mobility and reduce on-road VMT. Implementation of the proposed project would not increase regional population, housing, or employment. Therefore, implementation of the proposed project would be consistent with applicable GHG reduction strategies outlined in the SCAG 2024–2050 RTP/SCS, and there would be no impact.

3.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

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. Construction activities would involve the temporary transport, storage, and use of hazardous materials, such as petroleum-based fuels and lubricating fluids for construction equipment. Although these types of materials are not considered acutely hazardous, their storage, handling, and disposal are regulated by the California Department of Toxic Substances Control, U.S. Environmental Protection Agency, Occupational Safety and Health Administration, and the Los Angeles Fire Department (LAFD).

The proposed BESS would use iron-flow batteries made of iron, salt, water, aluminum, steel, and recyclable plastics. The BESS would require an electrolyte solution composed of iron(II) chloride, potassium chloride, and water, which would be replenished or replaced every five to ten years. None of the materials or chemicals used in iron-flow batteries are acutely hazardous, and the batteries would not require any special permits for disposal.

All project components, including the transformer and inverters, would be designed to ensure hazardous materials would be properly contained and that such substances would not spill or leak. Additionally routine maintenance and inspections would be conducted for the project components to prevent potential leaks.

The management and disposition of any hazardous substances, including transportation, treatment, disposal, or recycling, would be in accordance with all applicable local, state, and federal environmental, health and safety laws, ordinances, and regulations. All hazardous waste would be sent to state-licensed treatment, storage, and disposal facilities that have been approved to accept such waste. With adherence to all applicable codes, impacts related to a significant hazard through the routine transport, use, and disposal of these materials during project construction and operation would be less than significant.

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. As discussed in Section 3.9(a) above, construction activities would involve the transport, storage, and use of hazardous materials, such as fuels and lubricating fluids for construction equipment. These types of materials are not acutely hazardous, and compliance with existing federal, state, and local regulations would ensure that construction impacts related to reasonably foreseeable upset accident conditions involving the release of hazardous materials would be less than significant. All project components would be designed to ensure hazardous materials would be properly contained and that such substances would not spill or leak. Routine maintenance would be conducted for the BESS, inverters, floating and ground-mount solar panels, and electrical components, which would minimize the potential for upset and accident conditions. Compliance with existing federal, state, and local regulations would ensure that operational impacts related to the accidental release of hazardous materials into the environment would be less than significant.

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 project site is not located within 0.25-mile of any school. The closest existing school is Los Encinos School located approximately 0.8 miles north of the project site, and no proposed schools are planned in the vicinity. As such, no impact would occur related to the emission or handling of hazardous materials within a quarter mile of an existing or proposed school.

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. The project site is not included on the Department of Toxic Substances Control's EnviroStor database, which includes Cortese sites, and U.S. Environmental Protection Agency's database of regulated facilities, or other lists compiled pursuant to Section 65962.5 of the

Government Code.^{30, 31} Therefore, the proposed project would not create a significant hazard to the public or environment, and no impact would occur.

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

No Impact. The nearest airport is the Van Nuys Airport, located approximately 3.3 miles northeast of the project site. As such, the proposed project is not located within an airport land use plan or within two miles of a public airport. Thus, the proposed project would not result in an airport-related safety hazard or excessive noise for people working at the project site, and no impact would occur.

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

No Impact. The City of Los Angeles Emergency Management Department coordinates evacuations in the case of emergency with the Los Angeles Police Department (LAPD) and LAFD, as outlined in the City's Emergency Operations Plan.³² The County of Los Angeles designates disaster routes within the County. Within the proposed project area, designated disaster routes are Ventura Boulevard and U.S. Route 101 Freeway. Construction of the proposed project would occur within the boundaries of the Encino Reservoir property, which is closed to the public. Construction vehicle traffic would access the project site through the main gate for the Encino Reservoir property at Encino Avenue. No lane closures or restrictions on public roads would occur during construction. Operations would require occasional maintenance of project components, which would not result in changes to existing traffic patterns. As such, construction and operation would not alter the adjacent street system such that the project would impair implementation of an adopted emergency response plan or emergency evacuation plan. No impact would occur.

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

Less Than Significant Impact with Mitigation Incorporated. The project site is located in a designated Very High Fire Hazard Severity Zone (VHFHSZ) within a local responsibility area (LRA).³³ The project site is located within the Santa Monica Mountains and surrounded by vegetation and slopes, which increases wildfire hazard. The flat areas around the reservoir are regularly disced to control weeds and non-native grasses that have the potential to carry fire into the adjacent hillsides.

The project components would be constructed within flat areas around the Encino Reservoir property and would require the use of construction equipment that could increase the risk of fire ignition. Water trucks would be provided during all construction activities, which would minimize

³⁰ California Department of Toxic Substances Control. EnviroStor Database, Search by Map Location. Available at: <http://www.envirostor.dtsc.ca.gov/public/>. Accessed April 2025.

³¹ U.S. Environmental Protection Agency. Envirofacts Database. Available at: <https://enviro.epa.gov/>. Accessed April 2025.

³² City of Los Angeles, Emergency Management Department. 2023. City of Los Angeles Base Emergency Operations Plan. Available at: <https://emergency.lacity.org/emergency-plans-and-annexes>.

³³ Los Angeles Fire Department. Fire Zone Map. Available at: <https://www.lafd.org/fire-prevention/brush/fire-zone/fire-zone-map>. Accessed June 2025.

the potential for uncontrolled spread of wildfire. Additionally, as a City department, LADWP and its contractors would adhere to provisions of the Los Angeles Municipal Code, Chapter V (Public Safety and Protection), Article 7 (Fire Protection and Prevention), which would limit the risk of fire ignition in the VHFHSZ during construction. These provisions include:

- Section 57.313.3.1 Spark Arrestors: No person shall use or operate an internal combustion engine on or near grain, hay, grass, or brush-covered land, or where flammable fibers are stored, manufactured, or processed, unless the engine is equipped with an approved spark arrester that complies with the requirements of United States Forest Service “Standard for Spark Arresters for Internal Combustion Engines” (Standard 5100-1B, July 1991).
- Section 57.313.3.2 Exhaust System Maintenance: Spark arresters and the exhaust systems of engines or vehicles subject to this section shall be maintained in effective working order and not be affixed or mounted in such a manner as to allow flames or heat from the exhaust system to ignite any flammable material.
- Section 57.305.5.2. Restriction on Use of Certain Metal Cutting Blades: Use of metal cutting blades for grass or brush clearance shall be limited to those which are non-ferrous/non-sparking. The provisions of this section shall apply when grass or brush clearance operations are being conducted in accordance with Section 57.322.1 in areas within the VHFHSZ.
- Section 57.322.1.10 Additional Brush Clearance Requirements: All individuals performing grass or brush clearance activities in the VHFHSZ shall adhere to the following specific requirements:
 1. Grass or brush clearance operations shall not be conducted on red flag days.
 2. Individuals engaged in grass or brush clearance operations shall not engage in any other activities during their actual clearance of grass or brush.
 3. Individuals engaged in grass or brush clearance operations shall use an appropriate extinguishing agent immediately to extinguish a fire.
 4. All fires, regardless of size, shall be reported immediately via the 9-1-1 system to the Fire Department.
 5. A Class 2-A two (2) gallon water fire extinguisher, pressurized garden hose with attached nozzle (fully open), or comparable pressurized Class 2-A extinguishing device, shall be within 10 feet of any grass or brush clearance operation.
 6. Where a gasoline container is present at the site of the grass or brush clearance operation, a minimum 4A 60 B:C dry chemical fire extinguisher shall be within 10 feet of the brush clearance operation.
 7. A cell phone capable of dialing 9-1-1 shall be charged and readily accessible to the grass or brush clearance operation.
 8. A safety strap shall be used at all times for any tool or appliance with hot exhaust. Hot exhaust shall not come in contact with any brush, grass, flash fuels, or other flammable material.
- Section 57.4908.6. Smoking Prohibited: It shall be unlawful for any person to light, ignite or smoke any cigar, cigarette, tobacco in a pipe or other form of smoldering substance within the VHFHSZ.

In addition, the proposed project would implement Mitigation Measure HAZ-1 to prepare a project-specific wildfire prevention and response plan. With adherence to regulatory requirements and implementation of the mitigation measure, the risk of exposing people or structures to a significant risk of loss, injury or death involving wildland fires from construction of the proposed project would be less than significant.

The proposed project components would be designed and constructed to meet applicable federal, state, or industry standards, which would minimize the potential for components such as the transformer, inverter, or cabling to result in an accidental fire. The proposed ground-mount solar and associated equipment would be constructed on concrete pads and the vegetation around the pads would be regularly disced during operation. The proposed BESS would be located adjacent to the existing microfiltration plant, in a flat and more developed area of the property. The proposed BESS would utilize iron flow batteries, which are made from iron, salt, water, aluminum, steel, and recyclable plastics. The electrolyte solution in the BESS would be composed of iron(ii) chloride, potassium chloride, and water. None of these materials are flammable or considered a fire hazard. Thus, there is no risk of thermal runaway with the iron-flow batteries. Additionally, the BESS would be designed to comply with all current fire safety regulations in accordance with the NFPA 855: Standard for the Installation of Stationary Energy Storage Systems, UL 9540: Test Method for Battery Energy Storage Systems, and UL 9540A: Test Method for Battery Energy Storage Systems. Moreover, the proposed BESS would be enclosed by a concrete wall. Upon final design of the proposed BESS, LADWP would comply with all LAFD requirements for the BESS. Once operational, the proposed BESS would primarily rely on remote operation as part of the BoS and would be monitored by a Battery Management System that controls state-of-charge, system performance, and safety protocols that would automatically shutdown in case of a system malfunction. Therefore, the risk of exposing people or structures to a significant risk of loss, injury or death involving wildland fires from operation of the proposed project would be less than significant.

Mitigation Measure

HAZ-1 A Wildfire Prevention and Response Plan shall be prepared and implemented prior to the start of project construction and shall include the following elements:

- Training regarding fire prevention and control for LADWP and contractor construction supervisors and personnel is to be conducted prior to the initiation of construction activities. Training shall include information regarding ordinances related to construction work in a VHFHSZ; fire hazards in the Santa Monica Mountains, such as vegetation, weather, and terrain; risk factors, such as potential project-specific ignition sources; response and notification measures; fire suppression equipment and methods; and safety and evacuation plans.
- Provision for daily on-site wildfire risk assessment and safety orientation for construction crews.
- Ensuring ready access at the construction site to appropriate fire suppression equipment, such as hand tools and fire extinguishers, and that a water truck shall be present when work is being conducted to provide rapid response.
- Standards for clearing of vegetation, including an appropriate buffer zone, from areas where equipment and/or power tools will be operated.
- Monitoring of weather and vegetation conditions during construction, and suspension of all work during red flag warning conditions as determined by the

Los Angeles Fire Department, normally considered days on which winds are in excess of 25 mph and relative humidity is less than 15 percent.

- Designating fire prevention monitors during construction to ensure compliance with required procedures.

3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. Encino Reservoir is a manmade non-potable water storage reservoir. The reservoir functions were taken out of service in 2002 after the completion of the construction of new water supply trunk lines that enhanced water quality and reliability in the reservoir service area. The pump station adjacent to the reservoir continues to operate, while Encino Reservoir has remained out of service since it was taken offline in 2002.

Currently, surface water is captured in small catch basins around the reservoir. Any excess water from extreme storm conditions passes through standpipes and culverts that run under the perimeter access road and enter the reservoir while preventing sediment from being transported and deposited.

Construction of the proposed project would result in ground disturbance during excavation and grading that could impact surface or groundwater quality. However, during construction, runoff or pollutants would be minimized through BMPs, such as implementation of Rule 403 dust control measures required by the SCAQMD. Additionally, a project-specific BMP plan that includes erosion and sediment controls, as required by LADWP standard construction procedures, would reduce the amount of sediment and other pollutants from the project site that are discharged in stormwater runoff. With adherence to applicable regulations and implementation of preventative measures, construction activities would not substantially degrade surface or groundwater quality.

During operation, similar to existing conditions, excess storm flows from the project site would be captured in the catch basins, and flows from extreme storm conditions would enter Encino Reservoir. The proposed project would result in only a nominal increase in impervious surfaces from the ground-mount solar, inverters, transformer, switchgear, and BESS. Therefore, the project would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater, and impacts would be less than significant.

b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

No Impact. During construction, the proposed project would not require excavation to a depth that would encounter groundwater, affect the rate of groundwater recharge, or involve the extraction of groundwater. Construction activities would require water for dust control during demolition, grading, and construction activities. Water for these activities would be supplied from water trucks. As such, no impacts to local groundwater supplies or groundwater recharge would occur during project construction.

During operation, the project would not use large amounts of water that would substantially deplete groundwater supplies nor would it interfere with groundwater recharge. As discussed above, the proposed project would result in only a nominal increase in impervious surfaces from the concrete pads for the ground-mount solar, inverters, transformer, switchgear, and BESS. As such the groundwater recharge potential at the project site would be similar to existing conditions. Therefore, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, and no impact would occur.

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site?

Less Than Significant. During construction, grading and excavation activities would expose soils and leave them susceptible to erosion. As previously discussed, transport of sediments from the project site by stormwater runoff and winds would be prevented through best management practices such as implementation of Rule 403 dust control measures required by the SCAQMD and a project-specific BMP plan to control runoff, erosion, and sedimentation. With adherence to existing regulations and implementation of preventative measures, construction impacts associated with erosion and siltation would be less than significant.

Following construction, the project site would result in only a nominal increase in impervious

surfaces. However, the addition of the concrete pads for the project components would not result in substantial drainage changes as excess stormwater would continue to be captured in the catch basins surrounding the reservoir. Therefore, no substantial soil erosion or siltation would occur during project operations, and the impact would be less than significant.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

No Impact. As discussed in Section 3.10(c)(i) above, the addition of the concrete pads for the project components would not result in substantial drainage changes as excess stormwater would continue to be captured in the catch basins surrounding the reservoir. Under existing conditions, any excess stormwater from extreme storm events would continue to flow into the reservoir. The landside project components (ground-mount solar and associated equipment and BESS) would be located in areas that have not historically flooded during extreme storm events. There would be minimal change in the volume and intensity of runoff with implementation of the proposed project, and no impact would occur.

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?

No Impact. As discussed, the addition of the concrete pads for the project components would not result in substantial drainage changes as excess stormwater would continue to be captured in the catch basins surrounding the reservoir. As under existing conditions, any excess stormwater from extreme storm events would continue to flow into the reservoir. Therefore, no impact would occur.

iv. Impede or redirect flood flows?

No Impact. The project site is not located within a special flood hazard area. The project site is classified as Zone D under the Federal Emergency Management Agency's flood risk classification system, defined as an area with possible but undetermined flood hazards as no flood hazard analysis has been conducted.³⁴ As discussed in Section 3.10(c)(ii), the landside project components (ground-mount solar and associated equipment and BESS) would be located in areas that have not historically flooded during extreme storm events. Therefore, the proposed project components would not impede or redirect flood flows, and no impact would occur.

d) Would the project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less Than Significant Impact. As discussed in Section 3.10(c)(iv) above, the project site is not located within a special flood hazard area as designated by the Federal Emergency Management Agency. In the event of a high-water event in the reservoir precipitated by extreme precipitation, a channelized emergency spillway that ends approximately 100 feet west of the proposed BESS and a drain shaft located at the east of the reservoir would contain the flows and reduce the flood risk to project facilities. Therefore, impacts related to flood hazards would not occur.

³⁴ Federal Emergency Management Agency. Flood Map Service Center. Available at: <https://msc.fema.gov/portal/search>. Accessed February 2025.

Tsunamis are large ocean waves caused by the sudden water displacement that results from an underwater earthquake, landslide, or volcanic eruption. Tsunamis affect low-lying areas along the coastline. The project site is located approximately 7.2 miles northeast of the Pacific Ocean and inland of the coastal mountain range. No impact would occur.

Seiches are oscillations generated in enclosed bodies of water, such as reservoirs, usually caused by earthquake-related ground shaking. Encino Reservoir would be susceptible to seiche-related risks, and in the event of flooding caused by a seiche, the project components could release hazardous pollutants if inundated. However, the water in the reservoir is maintained at a low enough level that it would not be expected to overflow the sidewalls in the event of a seiche. Therefore, the risk of release of pollutants due to project inundation is considered low, and impacts would be less than significant.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact. The proposed project would implement Rule 403 dust control measures required by the SCAQMD and a project-specific BMP plan to control runoff, erosion, and sedimentation during construction. Operation of the proposed project is not anticipated to create runoff in excess of or in varying quality compared to existing conditions. Additionally, implementation of the proposed project would not include the extraction of groundwater. Therefore, the proposed project would not obstruct implementation of a water quality control plan or sustainable groundwater management plan. No impact would occur.

3.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a) Would the project physically divide an established community?

No Impact. The Encino Reservoir property is owned and operated by LADWP and includes the reservoir and a pump station and microfiltration plant. The proposed project components would be installed completely within the existing Encino Reservoir property. The Encino Reservoir property is closed to the public and partially secured by fences and gates. Neither construction nor operation of the proposed project would include any physical barriers that would divide an established community. No impact would occur.

b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. The project components would be constructed and installed within the existing boundaries of the Encino Reservoir property. The project site is zoned OS-1XL (Open Space) under the City’s zoning code and is designated OS (Open Space) under the Encino - Tarzana Community Plan of the City’s General Plan.^{35, 36} The existing uses are consistent with the zoning and general plan designations, and the project would not result in land use or zoning changes. While portions of the project site are located in the County of Los Angeles’ Santa Monica Mountains Significant Ecological Area, the Significant Ecological Area designation only applies to unincorporated portions of the County. Since the project site is within an incorporated portion of the County, the policies and regulations of the Significant Ecological Area would not apply to the project site. Therefore, the proposed project would not cause a significant environmental impact due to conflict with any land use plan, policy, or regulation, and no impact would occur.

³⁵ City of Los Angeles Zoning Information and Map Access System (ZIMAS). Available at: <http://zimas.lacity.org/>. Accessed December 2024.

³⁶ City of Los Angeles, Department of City Planning. 2010. General Plan Land Use Map Encino-Tarzana Community Plan.

3.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. The project site is located within a mineral resource zone area designated as MRZ-3.³⁷ Lands classified MRZ-3 are areas containing known or inferred Portland cement concrete aggregate resource of undetermined mineral resource significance.³⁸ The Encino Reservoir property is owned by LADWP, and no mineral extraction occurs within or near the property. Additionally, the proposed project would not include any mineral extraction activities. Therefore, the proposed project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state, and no impact would occur.

b) Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. The project site is not delineated as a locally important mineral resource recovery site in the City of Los Angeles General Plan or other land use plan.³⁹ No mineral extraction occurs within or near the project site, and the proposed project would not include any mineral extraction activities. Therefore, implementation of the proposed project would not result in the loss of availability of a locally important mineral resource recovery site, and no impact would occur.

³⁷ City of Los Angeles, Department of City Planning. 2010. General Plan Land Use Map Encino-Tarzana Community Plan.

³⁸ California Geological Survey. 2021. Updated Mineral Resource Zones for Portland Cement Concrete Aggregate in the San Fernando Valley and Saugus-Newhall Production-Consumption Regions.

³⁹ City of Los Angeles, Department of City Planning. 2001. *City of Los Angeles General Plan – Conservation Element*.

3.13 Noise

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project result in:</i>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

Potential impacts related to noise and vibration resulting from implementation of the proposed project are based on the information presented in the Noise and Vibration Technical Study, which is included as Appendix H to this IS/MND.

- 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. The standard unit of measurement for noise is the decibel (dB). The human ear is not equally sensitive to sound at all frequencies. The A-weighted scale, abbreviated dBA, reflects the normal hearing sensitivity range of the human ear. On this scale, the range of human hearing extends from approximately 3 to 140 dBA. The noise analysis presented below discusses sound levels in terms of Equivalent Noise Level (L_{eq}), Community Noise Equivalent Level (CNEL), and Maximum Noise Level (L_{max}). L_{eq} is the average noise level on an energy basis for any specific time period. The L_{eq} for one hour is the energy average noise level during the hour. The equivalent noise level is expressed in units of dBA.

CNEL is an average sound level during a 24-hour period. CNEL is a noise measurement scale, which accounts for noise source, distance, single-event duration, single-event occurrence, frequency, and time of day. Because CNEL accounts for human sensitivity to sound, CNEL is always a higher number than the actual 24-hour average sound level. L_{max} is the maximum, instantaneous noise level experienced during a given period of time. This descriptor is often referred to as the “peak noise level”. Typically noise levels in L_{max} are used as reference noise levels to calculate L_{eq} or CNEL.

Noise levels decrease as the distance from the noise source to the receiver increases. Noise generated by a stationary noise source, or “point source,” decreases by approximately 6 dBA over hard surfaces (e.g., reflective surfaces such as parking lots or smooth bodies of water) and 7.5 dBA over soft surfaces (e.g., absorptive surfaces such as soft dirt, grass, or scattered

bushes and trees) for each doubling of the distance.

Construction

Construction noise levels associated with typical construction equipment were calculated using the Federal Highway Administration Roadway Construction Noise Model. Construction-related noise levels would fluctuate depending on the construction phase, equipment type and duration of use, distance between the noise source and receptor, and presence or absence of noise attenuation barriers, including walls and natural topographic features. Construction activities typically require the use of numerous pieces of noise-generating equipment. Typical noise levels from various types of equipment that would be used during construction, range between 68.0 dBA and 85.0 dBA, L_{max} at 50 feet.

Table 3-5 shows the combined construction equipment noise levels by construction phase. The phased noise level is the combination of all construction equipment for each phase from various combinations of equipment that would be most likely be used concurrently at the same location. The BESS and ground-mount solar installation phases may occur concurrently but would not produce a combined noise level due to the distance between the construction sites. Conservatively, this noise analysis assumed noise-generating construction activities without additional reductions for topography, although some natural barriers related to terrain do exist on site.

Table 3-5: Phased Construction Noise Levels

Construction Phase	Combined Noise Level at 50 feet (dBA, L_{eq} (8-hour))
Floating Solar Installation	75.5
Conduit and Electrical Connections	83.9
Inverter/Switchboard Installation	84.6
BESS Installation	86.1
Ground-Mount Solar Installation	86.1

Source: Appendix H: Noise and Vibration Technical Study

Table 3-6 presents the estimated maximum construction noise levels at sensitive receptors within the project vicinity. Construction activities would occur between 7:00 a.m. and 7:00 p.m. Monday through Friday, and between 8:00 a.m. and 6:00 p.m. on Saturdays. During these times, there is no numerical threshold above ambient noise levels that has been established. The proposed project would not include nighttime construction. The proposed project would result in a significant impact related to construction noise if on- and off-site construction noise during daytime hours would exceed 80 dBA, L_{eq} (8-hour) at sensitive uses. As shown in Table 3-6, noise levels would not exceed the 80-dBA, L_{eq} (8-hour) significance threshold at any sensitive receptor. Therefore, the proposed project would result in a less than significant impact related to on-site construction noise.

Table 3-6: Construction Noise Levels at Sensitive Receptors

Sensitive Receptor	Distance from Site (feet)		Existing Noise Level (dBA, L _{eq})	Combined Construction Noise Level (dBA, L _{eq} (8-hour))	Exceed Threshold? (80 dBA, L _{eq} (8-hour))
	Center ^a	Edge			
Residences along Sumiya Dr. and Encino Ave.	230	200	51.1	74.2	No
Residences along Twilight Ln.	775	645	57.4	63.9	No
Residences along Lake Vista Ct.	900	750	44.5	62.6	No

^a Measured from the center of the nearest construction work zone.

Source: Appendix H: Noise and Vibration Technical Study

Off-Site Truck Trips

Construction activity would also generate noise through off-site truck trips on the roadway network. During the peak of construction, a total of 10 truck trips per day would be required. There would be approximately 100 truck trips in total during construction. All trucks would enter the project site at the existing entrance of the Encino Reservoir property at Encino Avenue. Construction truck trips would occur on an as-needed basis and would be spread throughout the construction period. A doubling of traffic volume is typically needed to audibly increase noise levels along a roadway segment. The addition of approximately 100 total truck trips throughout the duration of the construction period and a peak of 10 daily truck trips (an average of approximately 1 to 2 truck trips per hour) would not double the volume on any roadway segment and would not audibly change average daily noise levels. Therefore, the proposed project would result in a less than significant impact related to haul truck and delivery truck noise.

Operation

The proposed project would exceed local standards and significantly increase permanent noise levels if permanent ambient noise level measured at the property line of affected uses increases by 3 dBA CNEL, or any 5 dBA CNEL or more increase in noise level.

Operational noise would be generated by routine maintenance activities and operation of the proposed BESS. The proposed BESS would generate a noise level of approximately 75 dBA at 3 feet related to ambient hum of the batteries. The equipment would operate continuously, and the resultant 24-hour noise level would be approximately 82 dBA CNEL at 3 feet, which includes additional weighting for noise occurring during nighttime hours to account for increased human sensitivity to nighttime noise. The proposed BESS would be surrounded by a concrete wall that would be approximately 5 feet taller than the BESS, minimizing noise exposure to sensitive receptors. The wall would block the line-of-sight to nearby sensitive receptors. According to the Federal Highway Administration, blocking the line-of-sight between a source and receptor results in an approximately 5 dBA reduction in noise. The nearest sensitive receptors are residences located approximately 200 feet to the north of the proposed BESS location along Sumiya Drive and Encino Avenue. The proposed BESS noise level would be 40.5 dBA CNEL with the perimeter concrete wall, which would be approximately 7.8 dBA, CNEL lower than the existing noise level of 48.3 dBA, CNEL. The proposed BESS noise level without the wall would

be approximately 45.5 dBA, CNEL and would still be below the existing noise level. Thus, an incremental increase in noise would not occur at sensitive receptors to the north of the proposed BESS. Operation of the proposed BESS would not exceed local standards by increasing ambient noise by 3 dBA, CNEL or any 5 dBA, CNEL or more increase in noise level. Therefore, operation of the BESS would result in a less than significant impact.

Maintenance activities would not result in a new substantial source of noise. Occasionally, LADWP staff would access the proposed facilities for maintenance of the floating and ground-mount solar panels and for routine maintenance of the BESS. A doubling of traffic volume is typically needed to audibly increase noise levels along a roadway segment. The occasional trips would have no potential to double the traffic volumes around the project area. Therefore, operation of the proposed project would result in a less than significant impact related to noise.

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

Less Than Significant Impact. Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Vibration can be a serious concern, causing buildings to shake and rumbling sounds to be heard. In contrast to noise, vibration is not a common environmental problem. It is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. Some common sources of vibration are trains, buses on rough roads, and construction activities, such as rock blasting, pile driving, and heavy earth-moving equipment. Although very high levels of vibration may cause physical personal injury, vibration levels rarely affect human health. Instead, most people consider vibration to be an annoyance that may affect concentration or disturb sleep. In addition, high levels of vibration may damage fragile buildings or interfere with equipment that is highly sensitive to vibration (e.g., electron microscopes).

There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings and is usually measured in inches per second. The root mean square (RMS) amplitude is most frequently used to describe the effect of vibration on the human body. The RMS amplitude is defined as the average of the squared amplitude of the signal. Decibel notation (VdB) is commonly used to measure RMS. The VdB scale acts to compress the range of numbers required to describe vibration.

Construction

Construction activity can generate varying degrees of vibration, depending on the procedure and equipment. The use of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of a construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, and to slight damage at the highest levels. In most cases, the primary concern regarding construction vibration relates to damage.

Construction activities associated with the project that could result in damage include grading and excavation in close proximity to sensitive structures. The nearest sensitive receptors are older residences located approximately 200 feet away from construction activity. The

appropriate threshold for these sensitive receptors would be 0.3 inches per second PPV, which is applicable to older residential structures. Typical vibration levels associated with construction equipment range from 0.003 (e.g., small bulldozer) to 0.089 (e.g., large bulldozer) inches per second PPV at a distance of 25 feet. As the sensitive receptors would be located further than 200 feet away from vibration generating equipment, the vibration threshold would not be exceeded. Thus, the proposed project would not result in structural damage from construction vibration.

In addition to on-site construction activities, construction trucks on the roadway network have the potential to generate vibration. Construction truck trips would occur on an as-needed basis and would be spread throughout the construction period. Rubber-tired vehicles, including trucks, rarely generate perceptible vibration, which is defined as 65 VdB. Therefore, the proposed project would result in less than significant impacts related to vibration during construction.

Operation

The operation of the proposed project would not include any equipment or activities that would generate excessive vibration. During operation, vehicles would intermittently visit the project site for maintenance activities, similar to current operations. It is not anticipated that project-related trucks would generate perceptible vibration adjacent to the roadway network. Therefore, impacts related to vibration would be less than significant during project operation.

- c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

No Impact. The project site is not located within the vicinity of a private airstrip or two miles of a public airport or within an airport land use plan. The nearest airport is the Van Nuys Airport, located approximately 3.3 miles northeast of the project site. Due to the distance from the nearest airport, there is no potential for the proposed project to expose people working at the project site to excessive aircraft noise. Therefore, no impact would occur.

3.14 Population and Housing

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

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)?

No Impact. Due to the relatively low number of personnel required for project construction in the context of the Los Angeles urban area and the temporary nature of construction jobs, no substantial population growth in the area would occur related to construction of the proposed project. Operation of the proposed project would only require routine maintenance for the BESS performance and for periodic inverter inspections. Occasional maintenance and inspection of the ground-mount solar and floating solar panels would also be required. However, it is not anticipated that any new LADWP personnel would be required to operate the proposed project. Thus, the proposed project would not induce population growth in the area. In addition, the proposed project would not include new housing or businesses that would directly induce population growth. The purpose of the proposed project is to test the efficacy and efficiency of floating solar panels as a pilot project, which, if viable, would create an opportunity to increase renewable energy generation in the LADWP system. The energy produced would serve existing and projected LADWP customers. Therefore, the proposed project would not induce substantial population growth, and no impact would occur.

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

No Impact. The proposed project would be developed completely within the existing Encino Reservoir property. There is no housing within the property, and the proposed project would not require removal of any housing or displacement of people. Therefore, the proposed project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere, and no impact would occur.

3.15 Public Services

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a) Would the project 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?

No Impact. Fire protection services for the project site are provided by the LAFD. LAFD Station 83, located at 4960 Balboa Boulevard, approximately 1 mile northeast of the project site, is the nearest station and also serves the Encino Reservoir property.⁴⁰ An increased demand for fire protection is generally associated with new development, such as residential uses, or an increase in population. The proposed project would install floating solar panels, a ground-mount solar system, a BESS, and other associated infrastructure, which would not represent new development that would require fire protection services. Thus, it is not anticipated that the proposed project would result in new or physically altered fire protection facilities would be required to maintain acceptable service ratios, response times or other performance objectives. Furthermore, as discussed in Section 3.14, Population and Housing, the proposed project would not directly or indirectly induce population growth, and thus, would not result in an increased demand for fire protection services. Therefore, no new or physically altered fire protection facilities would be required to maintain acceptable service ratios, response times or other performance objectives. No impact would occur.

⁴⁰ Los Angeles Fire Department. Find Your Station. Available at: <https://lafd.org/fire-stations/station-results>. Accessed June 2025.

ii. Police protection?

No Impact. The LAPD is the local law enforcement agency responsible for providing police protection services in the City, including for the project site. The LAPD Department West Valley Community Police Station, located at 19020 Vanowen Street in Reseda, located approximately 3.5 miles north of the project site, is the nearest station and serves the Encino Reservoir property.⁴¹ The Encino Reservoir property is also fenced and gated. Because the project components would be constructed within the existing boundaries of the Encino Reservoir property, no new police protection services would be required. As discussed above in Section 3.15(a)(i), the proposed project would not directly or indirectly induce population growth, and thus, would not result in an increased demand for police protection services. Therefore, no new or physically altered police protection facilities would be required to maintain acceptable service ratios, response times or other performance objectives. No impact would occur.

iii. Schools?

No Impact. The demand for new or expanded school facilities is generally associated with an increase in housing, which would increase the population of school-aged children. As discussed above, the proposed project would not directly or indirectly induce population growth. Therefore, the proposed project would not require the construction of additional schools or the expansion of existing schools. No impact would occur.

iv. Parks?

No Impact. As discussed above, the proposed project would not directly or indirectly induce population growth. Thus, the demand for parks would not increase with implementation of the proposed project. No impact would occur.

v. Other public facilities?

No Impact. The demand for other public facilities, such as libraries, is also generally associated with population growth. As discussed above, the proposed project would not directly or indirectly induce population growth. Therefore, the proposed project would not result in the need for new or expanded public facilities. No impact would occur.

⁴¹ Los Angeles Police Department. Your LAPD by Division, West Valley Community Police Station. Available at: <https://www.lapdonline.org/lapd-contact/valley-bureau/west-valley-community-police-station/?zip=4500%20Encino%20Ave%20Encino%2091316>. Accessed December 2024.

3.16 Recreation

	Potentially Significant Impact	Less Than Significant Impact 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

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?

No Impact. Neither the construction nor operation of the proposed project would generate new permanent residents that would increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. The project site is located within the Santa Monica National Recreation Area, which is a network of regional parks and trails.⁴² However, the Encino Reservoir property is owned by LADWP, closed to the public, and partially secured by fences and gates. Therefore, no impact would occur.

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?

No Impact. The proposed project does not include recreational facilities or require construction or expansion of recreational facilities that might have an adverse physical effect on the environment. No impact would occur.

⁴² National Park Service. Santa Monica National Recreation Area Maps. Available at : <https://www.nps.gov/samo/planyourvisit/maps.htm>. Accessed December 2024.

3.17 Transportation

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

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

No Impact. Construction activities for the proposed project would occur within the boundaries of the Encino Reservoir property. During construction, the project site would accommodate temporary staging and laydown areas for construction materials and equipment, as well as worker vehicle parking. Construction vehicle access would be available via the gate from Encino Avenue. No lane closures or restrictions on public roads would be required. Additionally, operations of the proposed project would not change the circulation system. Therefore, the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, and no impact would occur.

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

Less Than Significant Impact. The proposed project is located in the City of Los Angeles; therefore, the LADOT Transportation Assessment Guidelines (LADOT Guidelines) apply to the assessment of the proposed project’s conflicts or inconsistencies with CEQA Guidelines Section 15064.3(b).⁴³

The LADOT Guidelines address thresholds of significance for land use development (residential, office, commercial, and other land uses) and transportation projects. The VMT assessment is intended to focus on the long-term, permanent transportation impacts related to the generation of automobile trips and the opportunities for alternative modes of transportation (public transit, walking, bicycling) associated with the development projects. Under the LADOT Guidelines, automobile trips associated with the temporary construction phase of a project are not considered to contribute to a VMT impact for the project.

In general, public services, including public utility functions such as the proposed project, are assumed under the LADOT Guidelines to not generate substantial VMT, and therefore, are presumed to have a less than significant impact on VMT. Furthermore, according to the

⁴³ Los Angeles Department of Transportation. 2022. *Transportation Assessment Guidelines*.

guidelines, if any land use project would generate a net increase of less than 250 daily vehicle trips, a no impact determination can be made relative to conflicts or inconsistencies with CEQA Guidelines Section 15064.3(b). Operation of the proposed project would primarily rely on remote operation, with occasional truck deliveries and maintenance visits by personnel, and therefore would not result in a net increase in VMT. Impacts would be less than significant.

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. As discussed above, construction activities for the proposed project would occur within the boundaries of the Encino Reservoir property. Operation of the proposed project would not introduce new geometric design features or incompatible uses to the road network. No changes to circulation would occur with implementation of the proposed project. Therefore, the proposed Project would not substantially increase hazards due to a geometric design feature or incompatible uses, and no impact would occur.

d) Would the project result in inadequate emergency access?

No Impact. The City of Los Angeles Emergency Management Department coordinates evacuations in the case of emergency with the LAPD and LAFD, as outlined in the City's Emergency Operations Plan. The County of Los Angeles designates disaster routes within the County. Within the proposed project area, the designated disaster routes are U.S. Route 101 (primary), Interstate 405 (primary), Ventura Boulevard (secondary), and Sepulveda Boulevard (secondary). As discussed above, construction activities for the proposed project would occur within the boundaries of the Encino Reservoir property. Construction vehicle access would be available via the existing gate from Encino Avenue, and no lane closures or restrictions on public roads would be required. Emergency access to the project site and surrounding area, particularly for emergency response vehicles, would be maintained at all times during construction. During operation, access to and within the project site would remain the same as existing conditions. Therefore, the proposed project would not result in any impacts to emergency access, and no impact would occur.

3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- 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)?**

No Impact. As discussed in Section 3.5, Cultural Resources, archival research and field surveys conducted of the project site concluded that there are no historical resources listed in the CRHR or in a local register of historical resources identified on the project site. There is one prehistoric archaeological resource previously recorded in within the Encino Reservoir property. This resource would not be impacted by the project. Therefore, the proposed project would not result in a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in a state or local register of historical resources, and no impact would occur.

- 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 Impact with Mitigation Incorporated. The Native American Heritage Commission identified Native American tribal representatives who could potentially have specific and unreported knowledge of Native American cultural resources within the project site. Pursuant to Assembly Bill (AB) 52, on November 13, 2024, LADWP notified 14 tribes of the project and invited them to consult on the potential for Native American resources within the project site. Three tribes responded, including the Gabrieleno Band of Mission Indians - Kizh Nation (Kizh Nation), the Fernandeno Tataviam Band of Mission Indians (FTBMI), and the Santa Ynez Band of Chumash Indians. The Santa Ynez Band of Chumash Indians responded on December 28, 2024, that the Tribe did not have any concerns with the project. Kizh Nation and FTBMI requested further consultation.

Since November 2024, LADWP made several attempts to consult with Kizh Nation, which included multiple appointments to meet, which were canceled by Kizh Nation the day before each respective meeting. On June 6, 2025, LADWP provided Kizh Nation with the Cultural Resources Technical Memorandum for review and comment. On June 24, 2025, Kizh Nation sent LADWP a letter expressing their concerns about the project, but provided no specific information regarding potential tribal cultural resources within the project site. Additionally, no specific comments were received on the Cultural Resources Technical Memorandum. LADWP responded to the letter on July 25, 2025, and reiterated LADWP's availability to consult further. No response was received from Kizh Nation. On September 24, 2025, LADWP sent a letter via email to Kizh Nation that provided them with the mitigation measures that were developed for the project, and concluded consultation pursuant to AB 52.

FTBMI responded to LADWP's invitation to consult on December 19, 2024. On March 4, 2024, LADWP provided FTBMI with the Cultural Resources Technical Memorandum for review and comment. No comments were received on the Cultural Resources Technical Memorandum. LADWP scheduled a consultation meeting with FTBMI on March 18, 2025, based on the availability provided by the Tribe, but the invitation was not accepted. On June 26, 2025, and June 30, 2025, LADWP consulted with the Tribe. On July 17, 2025, FTBMI provided recommended mitigation measures for the proposed project, which LADWP took into consideration in the development of the project mitigation measures. On September 24, 2025, LADWP sent a letter via email to FTBMI that provided them with the mitigation measures that were developed for the project, and concluded consultation pursuant to AB 52.

No specific tribal cultural resources were identified within the project site as a result of AB 52 consultation. Based on archival research, tribal consultation, and the field survey of the project site, the potential for the existence of tribal cultural resources is considered moderate. During the construction of the proposed project, unknown subsurface archaeological resources, including tribal cultural resources, could potentially be encountered during ground-disturbing activities. Therefore, Mitigation Measure TCR-1 would be implemented to require that LADWP retain a tribal monitor to monitor all ground-disturbing activities. With implementation of Mitigation Measure TCR-1, impacts would be less than significant.

Mitigation Measure

TCR-1 Native American Monitoring

LADWP shall retain a Native American monitor from interested consulting tribe(s) to monitor project-related ground-disturbing activities as specified by the LADWP Environmental Project Manager. The Native American monitor shall be

ancestrally affiliated with the project area and qualified by their tribe to monitor for tribal cultural resources (TCRs). Before initiating ground-disturbing activities, the Native American monitor shall be invited to conduct a brief awareness training session for the benefit of all construction workers and supervisory personnel. The training, which could be held in conjunction with the Project's initial on-site safety meeting, shall explain the importance of and legal basis for the protection of significant tribal cultural resources. Each worker shall be notified of the proper procedures to follow in the event that TCRs or human remains are uncovered during ground-disturbing activities. These procedures include immediately contacting the site supervisor and monitor(s), and work curtailment or redirection, should TCRs be encountered during construction.

3.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

a) Would the project 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?

No Impact. The proposed project would install new electric power equipment that includes floating solar panels, ground-mount solar panels and associated equipment, and a BESS in the Encino Reservoir property. All electrical equipment would interconnect to the existing 34.5-kV above ground distribution line. The project is a pilot project to test the efficacy and efficiency of floating solar panels and would not require the construction of additional electric power facilities for support. Additionally, while the proposed project would include the installation of new electric infrastructure, the infrastructure would not provide additional or expanded electric supply to the City and instead would be used to serve existing customers. Therefore, impacts related to the relocation or construction of new or expanded electric power infrastructure would be less than significant.

The project components would be located within the Encino Reservoir property and would not relocate any existing infrastructure. Moreover, the proposed project would not require the construction of new, or expansion of existing water, wastewater, stormwater drainage, natural gas, or telecommunications facilities. Therefore, there would be no impact.

b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. Construction activities would last approximately one year and would require water for dust control and mixing concrete, which would be delivered to the site. A water truck would supply water for dust control. Construction would be limited and temporary in nature and would not require large amounts of water. During operation, it is not anticipated that large amounts of water would be required. As such, project implementation would not result in the need for increased water supply to serve the project. Therefore, sufficient water supplies would be available to serve the proposed project and reasonably foreseeable future development during normal, dry, and multiple dry years, and impacts would be less than significant.

c) Would the project 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?

No Impact. The project would not require connection to the public sewer system, and the need for new or expanded facilities, the construction of which could cause significant environmental impacts, would not be required. Therefore, no impact would occur.

d) Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. Construction of the proposed project would generate relatively small quantities of solid waste in the form of construction debris such as packaging and excavated soils. It is estimated that up to 800 cubic yards of excavated soils would be hauled off site to landfill facilities within Los Angeles County. The closest landfill to the project site is the Calabasas Landfill, which has a remaining capacity of 6.7 tons as of December 2023 and a cease operation date of 2029.⁴⁴ The next closest Landfill is the Burbank Landfill Site No. 3, which has a remaining capacity of 4.5 million tons as of November 2021 and a cease operation date of 2053.⁴⁵ During the course of the construction period, the contractor would haul solid waste to a landfill that is still active and has remaining capacity. The proposed project would incorporate source reduction techniques and recycling measures in accordance with the Citywide Construction and Demolition Debris Recycling Ordinance, which would reduce the amount of construction-generated solid waste that would require disposal in the landfill. Thus, the amount of solid waste generated during construction of the proposed project would be minimized. Construction of the proposed project would not generate excess solid waste or impair solid waste reduction goals.

Project implementation would not substantially increase the amount of solid waste generation on-site. Operation would generate a nominal amount of waste from maintenance visits. Additionally, as discussed in Section 3.9(a), none of the materials or chemicals used in iron-flow

⁴⁴ CalRecycle. SWIS Facility/Site Activity Details, Calabasas Landfill. Available at: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3579?siteID=1041>. Accessed February 2025.

⁴⁵ CalRecycle. SWIS Facility/Site Activity Details, Burbank Landfill Site No. 3. Available at: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3561?siteID=1025>. Accessed February 2025.

batteries are acutely hazardous, and the batteries would not require any special permits for disposal. As such, the solid waste generation would not generate significant quantities of material such that the capacity of area landfills would be exceeded or that the attainment of waste reduction goals would be impaired. Impacts would be less than significant.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

No Impact. Construction debris would be disposed of in accordance with federal, state, and local statutes and regulations, including the City's Construction and Demolition Ordinance and Countywide Integrated Waste Management Plan. Any solid waste generated during project operations associated with occasional maintenance and vegetation clearing would be nominal and recycled or disposed of in accordance with local, state, and federal statutes and regulations. No impact would occur.

3.20 Wildfire

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:</i>				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

a) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The Encino Reservoir property is located in a VHFHSZ in a LRA, as designated by the LAFD.⁴⁶ As discussed in Section 3.17(d), the City of Los Angeles Emergency Management Department coordinates evacuations in the case of emergency with the LAPD and LAFD, as outlined in the City’s Emergency Operations Plan. The County of Los Angeles designates disaster routes within the County. Within the proposed project area, the designated disaster routes are the U.S. Route 101 (primary), Interstate 405 (primary), Ventura Boulevard (secondary), and Sepulveda Boulevard (secondary). Construction activities for the proposed project would occur within the boundaries of the Encino Reservoir property. Construction vehicle access would be available via the existing driveway from Encino Avenue, and no lane closures or restrictions would be required. Emergency access to the project site and surrounding area, particularly for emergency response vehicles, would be maintained at all times during construction. During operation, access to and within the project site would remain the same as existing conditions. Therefore, the proposed project would result in less than significant impacts related to substantially impairing an adopted emergency response plan or emergency evacuation plan.

⁴⁶ Los Angeles Fire Department. Fire Zone Map. Available at: <https://www.lafd.org/fire-prevention/brush/fire-zone/fire-zone-map>. Accessed June 2025.

- b) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, 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?**

Less Than Significant Impact With Mitigation Incorporated. The project site is located in a VHFHSZ within a LRA. As discussed in Section 3.9(g) above, the project site is located within the Santa Monica Mountains and surrounded by vegetation and slopes, which may increase wildfire risk. The project would be located within the Encino Reservoir property and would require the use of construction equipment that could increase the risk of fire ignition. As a City department, LADWP and its contractors would adhere to provisions of the Los Angeles Municipal Code, Chapter V (Public Safety and Protection), Article 7 (Fire Protection and Prevention), which would limit the risk of fire ignition in the VHFHSZ during construction. Additionally, the project would implement Mitigation Measure HAZ-1 to prepare a wildfire prevention and response plan, as outlined in Section 3.9(g). With adherence to regulatory requirements and implementation of the mitigation measure, construction impacts related to uncontrolled spread of wildfire would be less than significant.

The proposed project components would be designed and constructed to meet applicable federal, state, or industry standards, which would minimize the potential for components such as the transformer, inverter, or cabling to result in an accidental fire. The proposed ground-mount solar and associated equipment would be constructed on concrete pads, and the vegetation around the pads would be maintained during operation. The proposed BESS would utilize iron flow batteries, which are made from iron, salt, water, aluminum, steel, and recyclable plastics. The electrolyte solution in the BESS would be composed of iron(ii) chloride, potassium chloride, and water. None of these materials are flammable or considered a fire hazard. Thus, there is no risk of thermal runaway with the iron-flow batteries. Additionally, the BESS would be designed to comply with all current fire safety regulations in accordance with the NFPA 855: Standard for the Installation of Stationary Energy Storage Systems, UL 9540: Test Method for Battery Energy Storage Systems, and UL 9540A: Test Method for Battery Energy Storage Systems. Moreover, the proposed BESS would be enclosed by a concrete wall. LADWP would comply with all LAFD requirements for the BESS design, construction, and operation. Once operational, the proposed BESS would primarily rely on remote operation as part of the BoS that would automatically shutdown in case of a system malfunction. Therefore, the risk of exposure to pollutant concentrations from wildfire during operations is low.

The proposed floating solar panels would cover approximately 10 acres of the 130-acre reservoir (7.7 percent of the surface area). LADWP is coordinating with the LAFD regarding the use of Encino Reservoir for firefighting purposes. It is not anticipated that the proposed floating solar panels would interfere with firefighting operations related to collection of water from the reservoir by helicopters, nor would the proposed solar panels or other project components exacerbate wildfire risks. With adherence to the applicable standards, the impacts related to operation would be less than significant.

- c) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project 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?**

Less Than Significant Impact With Mitigation Incorporated. The proposed project would involve the installation of floating solar panels, ground-mount solar system, an iron-flow BESS, conduit, and associated equipment, including inverters, transformer, and switchgear. All electrical equipment would interconnect to the existing 34.5-kV above ground distribution line within the Encino Reservoir property. As discussed in Section 3.20(b), construction activities could have the potential to ignite a fire, and Mitigation Measure HAZ-1 would be implemented.

The proposed project components would be designed and constructed to meet applicable federal, state, or industry standards, which would minimize the potential for components such as the transformer, inverter, or cabling to result in an accidental fire. The proposed BESS would utilize iron flow batteries, which are made from iron, salt, water, aluminum, steel, and recyclable plastics. The electrolyte solution in the BESS would be composed of iron(ii) chloride, potassium chloride, and water. None of these materials are flammable or considered a fire hazard. Thus, there is no risk of thermal runaway with the iron-flow batteries. The BESS would include a BoS that would include monitoring of the system that could automatically shutdown in case of a malfunction. Thus, operation of the proposed project would result in less than significant impacts.

No additional infrastructure such as roads, fuel breaks, emergency water sources, power lines, or other utilities would be installed. Therefore, the proposed project would not require the installation or maintenance of associated infrastructure that may exacerbate wildfire risk, and impacts would be less than significant.

- d) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project 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?**

Less Than Significant Impact. The project site is located within the Santa Monica Mountains, and the topography of the Encino Reservoir property is hilly. However, the project components would not be located in a sloped area or an area classified as a landslide hazard zone. Additionally, the proposed project does not include any habitable structures that would be subject to post-fire slope instability. Thus, implementation of the proposed project would not expose people or structures to risks related to runoff or post-fire slope instability. Therefore, impacts would be less than significant.

3.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

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 with Mitigation Incorporated. As described in Section 3.4, Biological Resources, the proposed project has the potential to impact Coulter’s matilija poppy, a species with a CRPR of 4.2 (i.e., watch list species), during construction of the proposed BESS. Mitigation Measure BIO-1, which would require replanting the plant at a 1:1 ratio, would be implemented to reduce potential impacts to the rare plant to a less than significant level. Vegetation removal would occur at the existing boat ramp for construction of the temporary floating dock and for the installation of the conduit on the reservoir slope. Goodding’s willow and disturbed Goodding’s willow, which is a suitable habitat for LBVI, would be cleared. Although LBVI is considered absent from the project site, due to the potential to remove LBVI habitat (i.e., Goodding’s willow) during construction, the proposed project would implement Mitigation Measure BIO-2 to conduct a pre-construction survey for LBVI prior to removal of Goodding’s willow. Two special-status species, yellow warbler and coastal whiptail, and two non-listed special-status wildlife species, two striped garter snake and western red bat, have the potential to be impacted by construction activities. Direct and indirect impacts to yellow warbler would be reduced to less than significant with the implementation of Mitigation Measure BIO-3, which would require a pre-construction nesting bird survey and coordination with regulatory agencies if an active nest for yellow warbler is detected. Impacts to two-striped garter snake and coastal whiptail would be reduced to less than significant with implementation of Mitigation Measure BIO-4, which would require a pre-construction wildlife survey prior to vegetation removal by a

qualified biologist. Direct and indirect impacts to the western red bat would be reduced to less than significant levels with implementation of Mitigation Measure BIO-5, which would require tree removal activities to be performed outside of the bat maternity season or require monitoring by a qualified biologist if the maternity season cannot be avoided. Additionally, one State-candidate endangered species, Crotch's bumble bee, has the potential to be impacted by construction activities. Mitigation Measure BIO-6 would be implemented to conduct focused surveys during the flight period for the species to determine the presence of Crotch's bumble bee.

The Goodding's willow-red willow riparian woodland and forest community is a sensitive vegetative community that have the potential to be impacted during clearing around the boat ramp required for the installation of the floating solar panels and the installation of the conduit on the reservoir sidewall. The proposed project would implement Mitigation Measure BIO-7, which would require coordination with regulatory permitting agencies, biological monitoring, and limiting all construction activities to approved work areas to minimize impacts to riparian habitat and other sensitive natural communities. Toyon and blue elderberry shrubs and coast live oak trees, which are protected under the City of Los Angeles Protected Tree and Shrub Ordinance, are located near the area for the proposed ground-mount solar and associated equipment. Therefore, LADWP would implement Mitigation Measure BIO-8 to conduct a focused tree survey and establish tree protection zones to minimize impacts to protected trees and shrubs. In the event that removal of a protected tree or shrub species cannot be avoided during construction or operational activities, LADWP would be required to submit a Protected Tree and Shrub Report and Tree Removal Permit Application to the City prior to construction.

Based on the above, the proposed project would not have the potential to 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, or reduce the number or restrict the range of a rare or endangered plant or animal. Impacts would be less than significant with mitigation.

As described in Section 3.5, Cultural Resources, the project site does not support any important examples of major periods in California history. While there are no known important examples of California prehistory on the project site, archival research and the field survey indicate the project area has moderate sensitivity for archaeological resources, and the potential to inadvertently discover previously unrecorded archaeological resources during project construction activities exists. Therefore, the proposed project would implement Mitigation Measures CUL-1 and CUL-2 for a cultural resources awareness training and management plan and to stop work procedures in case of inadvertent discovery.

As discussed in Section 3.18, Tribal Cultural Resources, no known tribal cultural resources are located within the project site. However, based on archival research, a cultural resources field survey, and tribal consultation, the project area has moderate sensitivity for archaeological resources, and the potential to inadvertently discover previously unrecorded tribal cultural resources during project construction activities exists. Therefore, Mitigation Measure TCR-1 would be implemented to retain a tribal monitor from a consulting Native American tribe to monitor the ground-disturbing activities. With implementation of Mitigation Measures CUL-1, CUL-2, and TCR-1, the proposed project would not have the potential to 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)?

Less Than Significant Impact with Mitigation Incorporated. A significant environmental impact could result from the combined effects of two or more projects that are closely related geographically (i.e., within the same vicinity or greater region, depending on the nature and scope of the project and environmental factor under consideration) and in time (i.e., recently completed projects, projects currently under construction, and/or projects anticipated to be implemented in the near-term future). In general, the effects of a proposed project when combined with the effects of past projects (other than recently completed projects) are accounted for in the baseline conditions under CEQA for the analysis of the proposed project's environmental impacts.

The analysis of the combined impacts of more than one project allows decision makers to consider the potential consequences of a project in a broader environmental context rather than in isolation. This is necessary because a significant combined impact could result even when the individual impacts of related projects are less than significant. The combined effects of several related projects with individual impacts that are less than significant may also be determined to be less than significant on a cumulative basis. In addition, even if the combined effects of several related projects are determined to be significant, an individual project's incremental contribution to those significant combined effects may be determined to be less than cumulatively considerable and therefore less than significant.

Encino Reservoir was constructed between 1921 and 1924, and the Encino Filtration Plant and Pump Station was constructed at the north of the Encino Reservoir property in 2002. Currently, the Encino Reservoir property includes the reservoir, paved perimeter access roads, and undeveloped open spaces surrounding the reservoir and Encino Filtration Plant and Pump Station. The purpose of the proposed project is to test the efficacy and efficiency of floating solar panels as a pilot project, which, if viable, would create an opportunity to increase renewable energy generation in the LADWP system. Because the project is a public utilities function located within existing property historically controlled and used by a public utility, it would not generally represent a substantial change in the existing environment such that it would make a cumulatively considerable contribution to a significant impact when considered in combination with impacts from closely related projects. Specific environmental factors addressed throughout this IS/MND are discussed below with respect to cumulative impacts.

As shown in the environmental analysis in this IS/MND, the proposed project was determined to have no impact related to agriculture and forestry resources, land use and planning, mineral resources, population and housing, public services, and recreation. Because the project would have no impact in relation to these factors, it would not have the potential to contribute to a significant effect created by the combined impacts of closely related projects.

Impacts for all other environmental factors considered in this IS/MND were determined to be less than significant either with or without the need for mitigation measures. Impacts that would require mitigation include those related to biological resources; cultural resources; hazards related to wildland fires; tribal cultural resources; and exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

Impacts to aesthetic resources, including those related to scenic vistas, were determined to be

less than significant. These impacts would be isolated to the immediate area of the proposed project, and there are no known other related projects in the immediate area that would combine with the proposed project to create a cumulative impact. Therefore, the proposed project would not result in a cumulatively considerable contribution to aesthetics.

Air pollutant emissions, as assessed under CEQA, are inherently recognized as a cumulative impact. Project-level thresholds of significance for these emissions are used in the determination of whether a project's individual emissions would make a cumulatively considerable contribution to a significant impact. The proposed project construction activities would generate air pollutant emissions below SCAQMD regional significance thresholds, even when considering overlapping phases of construction. Therefore, construction of the proposed project would not result in a cumulatively considerable net increase of criteria pollutants. Additionally, construction of the proposed project would not exceed any applicable LST value, and thus, it is highly unlikely that air pollutant concentrations in ambient air would reach substantial levels sufficient to create public health concerns for sensitive receptors. Furthermore, construction of the proposed project would not produce daily emissions of particulate matter or O₃ precursors in excess of the applicable SCAQMD thresholds including those for sensitive receptors, even when considering overlapping activities. Any odors or other emissions released by the project construction would be localized and temporary. Because the proposed project is a solar energy facility, it would not introduce a new substantial stationary source of air pollutant emissions to the area during operation. Therefore, the proposed project would not result in a cumulatively considerable contribution to a wider adverse air quality impact.

Impacts to biological resources were determined to be less than significant with mitigation. Construction activities have the potential to impact Coulter's matilija poppy from construction of the proposed BESS. Mitigation Measure BIO-1 would be implemented to replant the plant species at a 1:1 ratio. Construction activities would also require removal of Goodding's willow, which is considered suitable habitat for LBVI. Mitigation Measure BIO-2 would require a pre-construction survey for LBVI prior to removal of Goodding's willow. Construction activities also have the potential to impact nesting birds, coastal whiptail, Crotch's bumble bee, western red bat, two-striped gartersnake, and other wildlife species. Mitigation Measures BIO-3 through BIO-6 would be implemented to reduce impacts to special-status and general wildlife to less than significant levels. The Goodding's willow-red willow riparian woodland and forest community has the potential to be impacted during construction activities. Impacts to the riparian habitat and other sensitive natural communities would be reduced to a less than significant level with the implementation of Mitigation Measure BIO-7, which would require coordination with regulatory permitting agencies. Toyon and blue elderberry shrubs may be impacted by construction activities for the proposed ground-mount solar and associated equipment, which would require implementation of Mitigation Measure BIO-8 for a focused tree survey and establishing a tree protection zone. These impacts would be site-specific in nature and limited to small areas within the 960-acre Encino Reservoir property and would not result in a cumulatively considerable contribution to impacts related to biological resources.

Potential impacts to related to cultural resources were determined to be less than significant through compliance with existing policies or regulations and with the implementation of Mitigation Measure CUL-1 and CUL-2. No impacts would occur to historical resources. Impacts related to potential archaeological resources and human remains, should they occur, would be site-specific in nature, and limited to the project construction footprint. Therefore, the proposed project would not result in a cumulatively considerable contribution to impacts related to cultural resources.

Similar to air quality, the use of energy is considered an impact with broader effects based on the potential consumption of limited energy resources. The proposed project would utilize electricity and petroleum-derived transportation fuels during project construction and operation, but the project's energy consumption would not be considered wasteful, inefficient, or unnecessary. During operation, the proposed project would generate onsite renewable energy that would support State and City goals to reduce reliance on carbon-emitting energy sources. The proposed project is estimated to generate approximately 10,280 MWh of clean, renewable energy annually. The energy produced from this installation is the equivalent of serving approximately 2,677 homes per year, offsetting 2,854 MTCO₂e per year, and eliminating 671 cars from the road per year. Therefore, the proposed project would not result in a cumulatively considerable contribution to impacts related to energy consumption.

Geology impacts related to seismic hazards and hazards created by various soil conditions pertain to the potential impacts from the environment on the proposed project rather than impacts to the environment caused by the project. In this regard the project would not result in a cumulatively considerable contribution to similar impacts experienced by closely related projects in the area. Geology impacts related to increased potential for erosion, loss of topsoil, or destruction of paleontological resources or unique geological features, if occurring, would also generally be site-specific in nature, but such impacts could also extend off site and result in a larger impact when combined with similar impacts from closely related projects in the area. However, given the nature of the proposed project and the existing setting within the Encino Reservoir property, off-site impacts would be largely eliminated. Additionally, through compliance with the design recommendations provided by site-specific geotechnical report that would be prepared, existing policies, and regulations (Rule 403 dust control measures and project-specific BMP plan), the proposed project would not result in a cumulatively considerable contribution to a more widespread impact potentially created by the combined effects of closely related projects. Therefore, the proposed project would not result in a cumulatively considerable contribution to impacts related to geology and soils.

GHG emissions, as assessed under CEQA, are inherently recognized as a cumulative impact. Project-level thresholds of significance for these emissions are used in the determination of whether a project's individual emissions would make a cumulatively considerable contribution to a significant impact. The combined GHG emissions generated during project construction and operation would result in a net reduction in carbon emissions. Additionally, the project would be consistent with plans, policies, and regulations adopted for the purpose of reducing the emissions of greenhouse gases. Therefore, the proposed project would not result in a cumulatively considerable contribution to impacts related to GHG emissions.

Regarding hazards and hazardous materials, the proposed BESS electrolyte solution would require the transport and storage of iron(II) chloride, potassium chloride, and water, which would be replenished or replaced every five to ten years. The contents of the iron-flow batteries are not acutely hazardous. All project components would be designed to ensure hazardous materials would be properly contained and that such substances would not spill or leak. Routine maintenance would be conducted for the BESS, inverters, floating and ground-mount solar panels, and electrical components, which would minimize the potential for upset and accident conditions. Compliance with local, state, and federal regulations as well as safeguards incorporated into the project to monitor for, limit, and contain accidental releases would minimize the potential for hazardous material release from the facilities. As such, hazardous materials associated with the project are not anticipated to combine with those used for other development projects in the area to create a cumulatively considerable effect. Regarding wildland fires, the Encino Reservoir property is located in a VHFHSZ. The project site is located

within the Santa Monica Mountains and surrounded by vegetation and slopes, which increases wildfire hazard. Mitigation Measure HAZ-1, requiring a site-specific Wildfire Prevention and Response Plan, would be developed prior to construction to minimize the risk of exposing people or structures to a significant risk of loss, injury or death involving wildland fires during construction. Furthermore, no known major projects that would contribute to a significant combined impact related to wildfire have been identified in the vicinity of the proposed project. Therefore, the proposed project would not result in a cumulatively considerable contribution to impacts related to hazards and hazardous materials.

Hydrology and water quality impacts related to an increased potential for runoff, siltation, flooding, pollution discharges, and groundwater encounters would generally be site-specific in nature. Construction activities would be required to comply with SCAQMD Rule 403 dust control measures and would implement a project-specific BMP plan, as required by LADWP standard construction procedures. During operation, similar to existing conditions, excess storm flows from the project site would be captured in the catch basins, and flows from extreme storm conditions would enter Encino Reservoir. Given the nature of the proposed project and the existing setting within the Encino Reservoir property, the proposed project would not result in a cumulatively considerable contribution to impacts related to hydrology and water quality.

Impacts related to noise and vibration have the potential to affect a limited area beyond the boundaries of the project site. The assessment of the combined effect of the project and the surrounding existing setting determined a less than significant impact related to noise and vibration. During project construction activities, noise and vibration impacts would be temporary and less than significant. During operation, noise generated from routine maintenance activities would be minor and infrequent, and the noise generated by the BESS would be less than significant and further minimized by the wall that would be approximately 5 feet taller than the BESS. Furthermore, no known major projects that would contribute to a significant combined impact related to noise have been identified in the vicinity of the proposed project. Therefore, the proposed project would not result in a cumulatively considerable contribution to impacts related to noise.

Regarding transportation, public services, including public utility functions such as the proposed project, generally are assumed under the LADOT Guidelines to not generate substantial VMT, and therefore, are presumed to have a less than significant impact on VMT. The project would not result in changes to existing traffic patterns or lane closures. Operation of the proposed project would primarily rely on remote operation, with occasional truck deliveries and maintenance visits by personnel, and would not generate a significant number of new trips. Therefore, the proposed project would not result in a cumulatively considerable contribution to impacts related to transportation.

The potential for the existence of tribal cultural resources at the project site is considered moderate based on tribal consultation, archival research, and the field survey of the project site. Thus, the project would implement Mitigation Measure TCR-1 to retain a tribal monitor for ground-disturbing activities, which would minimize the potential for unanticipated impacts to tribal cultural resources. Therefore, the proposed project would not result in a cumulatively considerable contribution to impacts related to tribal cultural resources.

Impacts related to utilities and service systems could contribute to a significant impact from the combined effects of more than one project on the limited capacity of services such as water supply, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, and solid waste disposal. The project would install new electric

power equipment that includes floating solar panels, ground-mount solar panels, associated equipment, and a BESS in the Encino Reservoir property. All electrical equipment would interconnect to an existing above ground distribution line, and the energy produced would serve customers to meet existing demand. Construction and operational activities are not anticipated to use large amounts of water that would require an increased water supply. Additionally, the project would generate a small volume of solid waste from construction debris, excavated soils, maintenance activities, and vegetation clearing in terms of daily throughput and current remaining capacity of area landfills or recycling centers. Thus, the proposed project would have less than significant impacts related to utilities and service systems. Therefore, the proposed project would not result in a cumulatively considerable contribution to impacts related to utilities and service systems.

The proposed project would create less than significant impacts related to wildfire with implementation of Mitigation Measure HAZ-1. The Encino Reservoir property is located in a VHFHSZ in a LRA that extends north to Ventura Boulevard and south into the Santa Monica Mountains. The project site is located within the Santa Monica Mountains and surrounded by vegetation and slopes, which increases wildfire hazard. The proposed project components would be designed and constructed to meet applicable federal, state, and industry standards, which would minimize the potential for accidental fire. None of the materials used in the BESS iron-flow batteries are flammable or considered a fire hazard. LADWP and its contractors would adhere to provisions of the Los Angeles Municipal Code, Chapter V (Public Safety and Protection), Article 7 (Fire Protection and Prevention), which would limit the risk of fire ignition during construction. Additionally, the project would implement Mitigation Measure HAZ-1 to prepare a wildfire prevention and response plan for project construction. The floating solar panels would cover approximately 10 acres of the water surface in the southwest corner of the 130-acre Encino Reservoir. It is not anticipated that the panels would interfere with firefighting operations related to collection of water from the reservoir by helicopters. Furthermore, no other projects that would contribute to a significant combined impact related to wildfire have been identified in the vicinity of the proposed project. Therefore, the proposed project would not result in a cumulatively considerable contribution to impacts related to wildfire.

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. Numerous factors discussed in the environmental impact analyses presented throughout Chapter 3 pertain to the quality of the human environment, including aesthetics, air quality, GHG emissions, hazards and hazardous materials, land use and planning, noise, population and housing, public services, utilities and service systems, and wildfire. Based on the analysis contained in the IS/MND, the environmental impacts created by the proposed project in relation to most of these factors would be absent or less than significant.

However, as discussed in Section 3.9(g) and Section 3.20(b), project construction would result in potentially significant impacts related to wildland fires and wildfire. Therefore, Mitigation Measure HAZ-1, requiring the preparation of a project-specific wildfire prevention and response plan, would be implemented to reduce the risk of wildfire during project construction.

With the incorporation of this mitigation measure, the project would not have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly. Impacts would be less than significant with mitigation incorporated.

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