

Initial Study

Substation Program

Lead Agency:



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

September 2026

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**CEQA Initial Study
Substation Program**

September 2026

Gareth Howell
Director of Corporate Environmental Affairs

Eduardo Cuevas
Acting Manager of Environmental Planning and Assessment

Prepared by:
Los Angeles Department of Water and Power
111 N. Hope Street
Los Angeles, CA 90012

Technical Assistance Provided by:
Michael Baker International, Inc.
801 S. Grand Avenue, Suite 250
Los Angeles, CA 90017

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ACRONYMS, ABBREVIATIONS, AND GLOSSARY OF TERMS

AB	Assembly Bill
ACM	asbestos-containing materials
AQMP	Air Quality Management Plan
BACT	best achievable control technology
BMPs	best management practices
C&D	Construction and Demolition
CBC	California Building Code
CEQA	California Environmental Quality Act
City	City of Los Angeles
CPIO	Community Plan Implementation Overlay
DCTWRP	Donald C. Tillman Water Reclamation Plant
DS	Distributing substation
DTSC	Department of Toxic Substances Control
EIR	environmental impact report
FEMA	Federal Emergency Management Agency
GHG	greenhouse gas
GSP	Groundwater Sustainability Plan
HPOZ	City of Los Angeles Historic Preservation Overlay Zone
HVAC	heating, ventilation, and air conditioning
HWRP	Hyperion Water Reclamation Plant
kV	kilovolt
kWh	kilowatt-hour
LADBS	City of Los Angeles Department of Building and Safety
LADWP	Los Angeles Department of Water and Power
LAFD	City of Los Angeles Fire Department
LAGWRP	Los Angeles-Glendale Water Reclamation Plant
LAMC	City of Los Angeles Municipal Code
LAPD	City of Los Angeles Police Department
LASAN	City of Los Angeles Bureau of Sanitation
LED	light emitting diode
LID	low impact development
LBP	lead-based paint
MGD	million gallons of water per day
MRZ	mineral resource zone
MS4	Municipal Separate Storm Sewer Systems
MVA	megavolt ampere
MW	megawatt
MWD	Metropolitan Water District of Southern California
NPDES	National Pollutant Discharge Elimination System
OSHA	Occupational Safety and Health Administration
PCB	Polychlorinated biphenyl
PEIR	Program Environmental Impact Report
RS	Receiving Substation
SCADA	Supervisory Control and Data Acquisition
SCAQMD	South Coast Air Quality Management District
SLTRP	Strategic Long-Term Resource Plan (now known as LA100 Plan)
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board

TIWRP
UWMP
VMT

Terminal Island Water Reclamation Plant
Urban Water Management Plan
vehicle miles traveled

Term	Definition
Auto Reclosers	An electrical power system device that automatically attempts to close an overhead circuit after a fault, quickly restoring power if the fault is momentary and keeping the circuit open if the fault persists.
Busbar	A rigid conductive metal bar (or set of bars) in a substation used to distribute electrical power among circuits, transformers, and other equipment.
Capacitor Bank	A set of capacitors operated as a single unit to regulate voltage, reduce power losses, and maintain power factor.
Circuit Breaker	An electrical device designed to interrupt fault currents to protect power system equipment from short circuits, overloads, and abnormal conditions.
Circuit Position	A location and assembly of equipment within a substation designated for the connection of a subtransmission circuit.
Commissioning	The formal process of testing and verifying new or modified equipment or systems to ensure proper operation before they are placed into service.
Conductor	A wire or cable that carries electrical current. In LADWP practice, “conductor” is often used when referring to overhead power lines, while “cable” refers to underground lines.
Conduit	A pipe or tube installed underground, either directly buried or encased in concrete, used to enclose and protect electric power or communication cables.
Control House	A building within a substation that houses equipment for monitoring, protection, control, and communication functions.
Copper Ground Grid	A network of buried copper conductors in a substation installed for the purpose of providing a low-resistance path to ground for safe dissipation of fault currents and lightning.
Distributing Substation	A substation containing equipment for the purposes of switching subtransmission system circuits, transforming subtransmission system voltage (34.5-kV) down to distribution system voltage (currently 4.8-kV), regulating voltage, switching 4.8-kV circuits, and/or supplying power to customers.
Duct (Conduit)	A pipe or tube used to accommodate an electric power or communication cable.
Duct Banks	An underground, concrete-encased structure consisting of one or more conduits bundled together for installing and protecting underground power lines.
Feeder	A distribution system power line that carries medium-voltage electricity (such as 4.8 kV or 12 kV) from a distributing substation toward end-users.
Grounding	The practice of electrically connecting equipment to the earth to safely dissipate fault current and reduce electrical hazards.
Pole-Top Transformer Rack	An overhead, pole-mounted installation of distribution system equipment used to meet local demand, relieve overloaded feeders, or serve areas with limited capacity.

Pull Box	An enclosure used to route electrical cables, facilitate cable pulling, and provide access for installation, maintenance, and inspection.
Racks	Steel structures used to support and organize electrical equipment in a substation. In LADWP practice, “rack” is also used to collectively refer to the assembly of equipment supported by the steel structure.
Receiving Substation	A substation that connects the transmission and subtransmission systems. A receiving substation contains equipment for switching transmission and subtransmission circuits, transforming high voltage power (typically 138kV or 230kV) to the subtransmission system level (34.5kV), regulating voltage, and supplying large customer loads.
Substation	A facility within an electrical power system that transforms voltage levels, switches circuits, and/or regulates power flow between generation sources and end users. This includes receiving substations and distributing substations.
Subtransmission Line	A subtransmission system power line, typically operated at a voltage of 34.5 kV.
SCADA	Supervisory Control and Data Acquisition system utilized by LADWP to monitor and control critical power system assets, automatic generation control, inter-control center communications, and to participate in the Energy Imbalance Market.
Switchgear	A generic term for an assembly of equipment used to interrupt or reroute electrical current flow or provide disconnection.
Transformer	A device designed to increase or decrease voltage levels in an electrical system.
Transformer Bank	A set of transformers (either a single three-phase unit or multiple connected single-phase units) operated as a single unit to provide voltage transformation and power capacity.
Transmission Line	A transmission system power line, typically operated at voltages between 138 kV and 500 kV.
Voltage Regulator	A device designed to continually maintain proper voltage levels by increasing or decreasing voltage as needed.

1 PROJECT DESCRIPTION

1.1 Project Overview

The Los Angeles Department of Water and Power (LADWP) proposes to modernize its electrical distribution system by constructing new distributing substations and improving existing substations, which consists of distributing substations and receiving substations. These efforts, collectively referred to as the Substation Program and herein referred to as the Proposed Program, are necessary to meet projected increases in electricity demand driven by increased population density within existing service areas, growth of energy-intensive industries, and the electrification of functions currently powered by the combustion of fossil fuels. Each new distributing substation would be an enclosed substation with a total bank capacity of 32 to 90 megavolt-amperes (MVA). Improvements to existing substations would include replacing existing equipment, adding new equipment, and general upgrades to existing substations. The Proposed Program would enhance system reliability, provide redundancy, improve resiliency to extreme climate events, and support state and local mandates for clean energy. Modernization of the distribution system and its infrastructure is essential to meet current needs, address safety concerns, and prepare for future demand.

The Proposed Program aims to alleviate loading on existing substations, modernize aging distribution system infrastructure, meet the growing demand for electricity, and ensure the delivery of reliable power throughout the City of Los Angeles (City). The Proposed Program analyzed in this Initial Study includes the construction of four new distributing substations (new development), expansion of existing substations which would extend beyond the existing substation footprint (expansion), minor improvements to existing substations (minor improvements), and other distribution system improvements. These activities are expected to occur through the planning horizon year 2045.

1.2 California Environmental Quality Act

1.2.1 Lead Agency

The California Environmental Quality Act (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 Substation Program 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 Program, LADWP is the lead agency responsible for compliance with CEQA.

1.2.2 Initial Study

As the CEQA lead agency, LADWP must complete an environmental review to determine if implementation of the Proposed Program may result in significant adverse environmental impacts as defined under CEQA and to propose measures and/or alternatives, as feasible, to reduce or eliminate any such identified impacts. LADWP has prepared a CEQA Initial Study (contained herein) to help determine if the Proposed Program could have the potential to cause significant adverse impacts. Pursuant to Section 15063 of the CEQA Guidelines, this Initial Study provides an evaluation of all phases of project planning, implementation, and operation.

Based on the conclusions in this Initial Study, LADWP has determined that the Proposed Program may potentially create significant impacts related to various environmental factors considered under CEQA. Furthermore, pursuant to CEQA Guidelines Section 15168, LADWP determined that a program Environmental Impact Report (PEIR), described in Section 1.2.3 below, is the appropriate process for evaluating the potential impacts of the Proposed Program. Environmental factors that were determined in this Initial Study to have less than significant impacts will not be carried forward, in whole or in part, for further detailed evaluation in the PEIR and, in accordance with Section 15063 of the CEQA Guidelines, the PEIR analysis will focus on those environmental factors that may involve potentially significant impacts.

1.2.3 Program Environmental Impact Report

A PEIR will be prepared pursuant to CEQA Guidelines Section 15168 given the scope of the Substation Program.

As described in CEQA Guidelines Section 15168:

A program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either:

- (1) Geographically,
- (2) As logical parts in the chain of contemplated actions,
- (3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or
- (4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

The PEIR will evaluate the broad, policy-level, and long-term environmental implications of the Substation Program, recognizing that subsequent site-specific actions may require additional CEQA review. The PEIR will be used, as appropriate, when specific future projects are known pursuant to CEQA Guidelines Sections 15168(c) (use of a program EIR with activities), 15152 (tiering), 15162-15164 (subsequent or supplemental CEQA documentation and addenda), and/or other sections of the CEQA Guidelines that provide for streamlined environmental review.

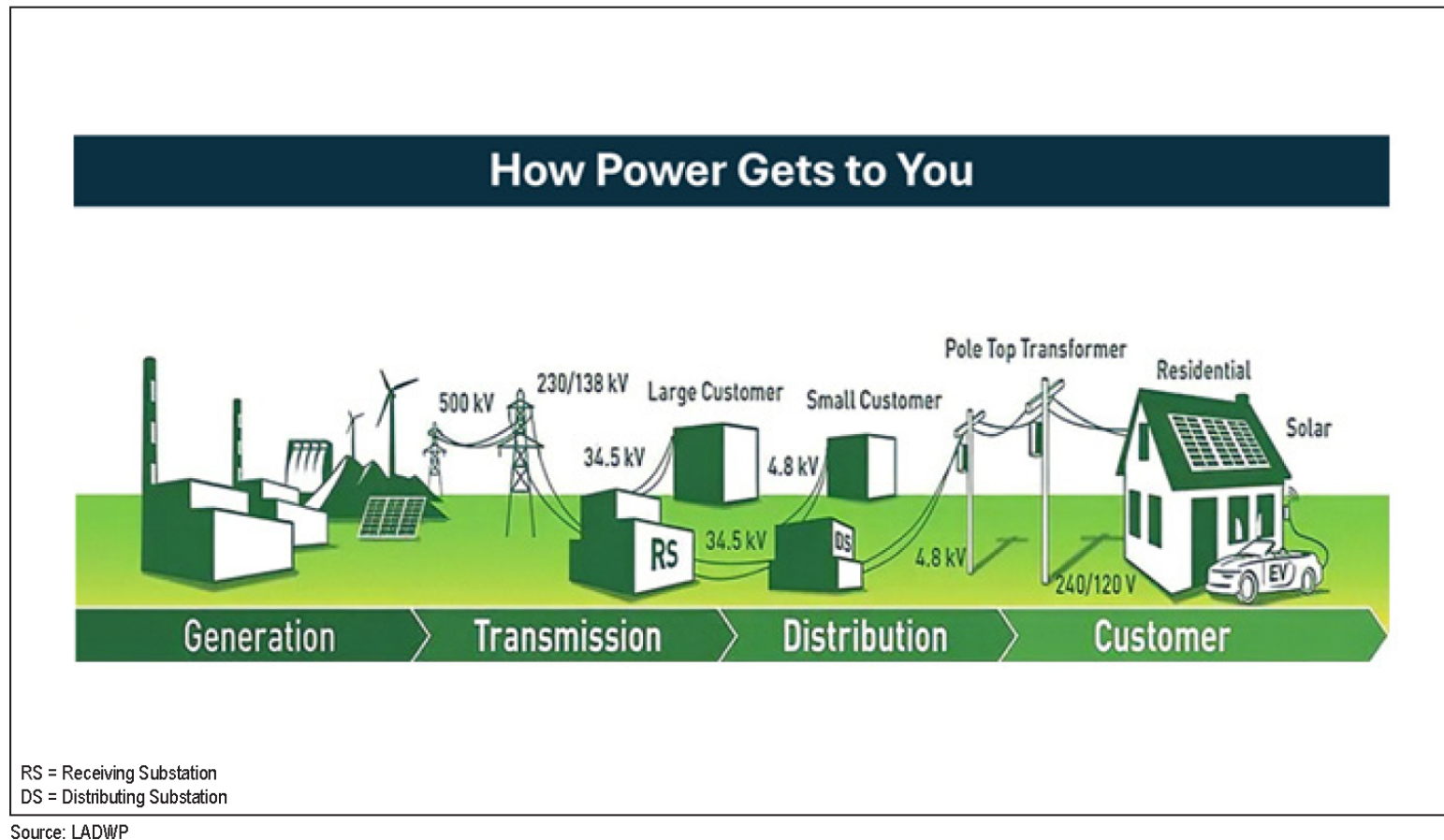
1.3 Project Background

LADWP is the nation's largest municipal power utility, with a diverse and vertically integrated power system that spans five western states and delivers power to more than 4 million people in the City. The LADWP Power System consists of three main components: generation, transmission, and distribution. Power generation involves the production of electricity using energy sources such as natural gas, geothermal, hydro, wind, and solar. After generation, the electricity is stepped up to increase the voltage for more efficient, long-distance transmission. High voltage transmission lines (ranging from 138 kilovolts [kV] to 500kV) carry the electricity to receiving substations where the high voltage electricity is stepped down to subtransmission level (34.5 kV). From the receiving substations, subtransmission lines carry electricity to large end-users and to distributing substations, where the voltage is further reduced to distribution level (4.8kV). The electricity is then carried out of the distributing substation through feeders.

Distribution transformers further step down the voltage to levels suitable for customer end-use (e.g., 120 volts [V], 240V). Overall, the distribution system includes 21 receiving substations, 123 distributing substations, over 540 34.5kV circuits, and over 1,700 4.8kV feeders throughout the City. Figure 1 shows a conceptual layout of the power system. Figure 2 shows the regional location of the City.

LADWP implements the Power System Reliability Program to evaluate and prioritize maintenance and replacement of major power infrastructure components to maintain reliable electricity service to its customers now and in the future. The purpose of the Power System Reliability Program is to improve power system reliability, provide proactive replacement and maintenance, address overloads, and increase grid capacity. LADWP's Power Infrastructure Plan details recent accomplishments and outlines future goals being implemented through the Power System Reliability Program. One of the long-term goals of the 2023-2024 Power Infrastructure Plan is to expand 4.8kV system capacity by 800 megawatts (MW) and 34.5kV system capacity by 1,700 MW by 2040 to address overloads and accommodate growth of electrification.¹ Based on the goals of the Power System Reliability Program, LADWP has identified a need for new distributing substations and improvements to existing substations, which is further evaluated in LADWP's Distribution Load Forecast. The 2025 Distribution Load Forecast modeled load and distributed generation through 2045 for all major distribution assets, which include receiving substations, distributing substations, 34.5kV circuits, and 4.8kV feeders throughout the City. The need for the Proposed Program is based on the 2025 Distribution Load Forecast's assessment of infrastructure needs and system expansion and improvements.

¹ Los Angeles Department of Water and Power. *2023-2024 Power Infrastructure Plan*. Available at: https://ladwp-jtti.s3.us-west-2.amazonaws.com/wp-content/uploads/sites/3/2024/09/18085816/2024_Power-Infrastructure-Plan-Final_Digital.pdf.

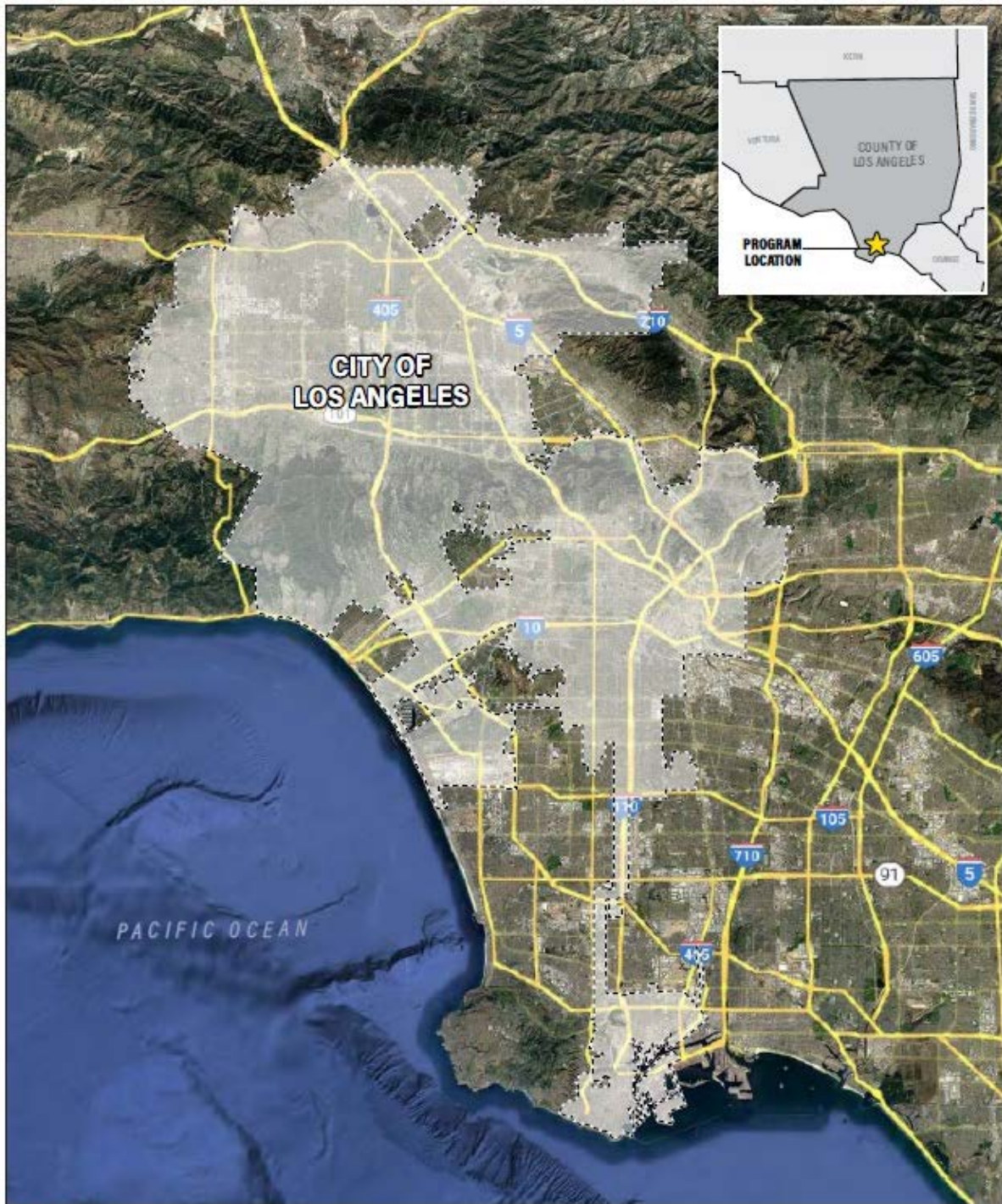


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SUBSTATION PROGRAM

Power System Components

Figure 1



Source: Google Earth Pro, January 2026



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SUBSTATION PROGRAM
Regional Location Map

Figure 2

1.3.1 Existing Substation Infrastructure

LADWP's distribution system consists of receiving substations, distributing substations, 34.5-kV circuits, and 4.8-kV feeders, as detailed below.

Receiving substations serve a vital role within the transmission and distribution network by ensuring a safe, reliable, and efficient flow of electricity to industrial, commercial, and residential customers. Receiving substations receive high voltage power (typically 138kV or 230kV) from the transmission system, and transformers at the station step down the voltage to 34.5kV, which is then either distributed to serve large end-users (e.g., large commercial or industrial uses) or transmitted to distributing substations via the 34.5kV subtransmission system. Receiving substations are typically equipped with switchgears, circuit breakers, busbars, circuit positions, transformers, and capacitor banks. There are currently 21 receiving substations located within the City boundaries. In the last 20 years, only one new receiving substation has been constructed, RS-X at Los Angeles International Airport. Receiving substations have sizing challenges due to the type and size of equipment needed to handle higher voltages and the amount of space required.

Distributing substations are a critical component of the distribution network, ensuring a safe, reliable and efficient flow of electricity to residential and commercial customers. Distributing substations receive high voltage power (34.5kV) from the receiving substations, and transformers at the distributing substations further step down the voltage from 34.5kV to 4.8kV, which is suitable for local distribution to end users. Distributing substations are typically equipped with switchgears, circuit breakers, busbars, transformers, feeder, voltage regulators, and capacitor banks. There are currently 123 distributing substations (indoor and open-air) located within the City boundaries, of which 100 have been in operation for over 75 years. In the last 20 years, only three new distributing substations have been constructed. Existing indoor distributing substations are generally more difficult to operate and maintain due to aging equipment that may not meet current standards and may require stricter safety protocols. This aging equipment may also be incompatible with upgrades necessary to automate and modernize outdated systems.

Additionally, there are currently 34 pole-top transformer racks located throughout the City which are strategically placed to support load growth, relieve overloaded feeders, and supply electricity to load-constrained areas. These pole-top transformer racks have been installed over the last 89 years and are meant to be temporary solutions to meet local customer demand for electricity until more permanent capacity-expanding solutions are implemented.

1.3.2 Assessment of Distribution System Needs

LADWP evaluates both load growth factors (e.g., extreme weather events, building growth rates, new interconnections, and increasing electrification in transportation and buildings) as well as load reduction factors (e.g., improved energy efficiency, local solar implementation, energy storage expansion, and demand response programs that reduce electricity use during peak demand periods) when assessing distribution system needs. The capacity criteria for the load forecasting also consider rare temperature events, defined as a heatwave exceeding historic temperatures that are expected to occur once every ten years.

Distribution plans are created to address specific needs within the distribution system. These plans may include equipment re-rating, upgrades, load transfers, new circuits, substation improvements, and construction of new substations. Even with current development plans for existing substations, capacity shortfalls are projected to remain significant. Demand has been

growing faster than LADWP's ability to increase distribution system capacity, resulting in equipment being operated above rated capacity limits and/or installation of temporary pole-top transformer racks. This sustained overloading poses risks such as premature equipment failures, reduction in the useful life of the equipment, and limited operational flexibility.

Based on the findings of the LADWP 2025 Distribution Load Forecast, distributing substations are currently experiencing a significant capacity shortfall that is projected to worsen over time. In 2024, 19 distributing substations exceeded their capacity. Despite ongoing and planned mitigation efforts, 17 distributing substations are projected to exceed capacity by 2035 due to load growth primarily associated with large-load customers, electric transportation, and electric vehicle charging. The collective shortfall across distributing substations is forecasted to reach 60 MVA by 2035, increasing to 110 MVA by 2040 and 182 MVA by 2045. However, needs and demand vary by service area, and an in-depth assessment was conducted to identify ways to reduce capacity shortfalls while maintaining reliability during times of high demand.

Receiving substations are also projected to face growing capacity challenges. By 2035, receiving substations are expected to face a collective capacity shortfall of 94 MVA, increasing to 187 MVA by 2040 and 308 MVA by 2045. Additionally, expansion needs at receiving substations are driven by the demand for additional circuit positions. Unlike distributing substations, receiving substations serve large industrial and commercial customers with substantial individual loads. In some cases, existing circuit positions cannot accommodate the interconnection of new large-load customers, necessitating the addition of new circuit positions. As such, MVA shortfall alone does not fully capture the infrastructure needs at these facilities.

The Proposed Program focuses on alleviating the load on existing substations; modernizing aging equipment and infrastructure associated with the distribution system; and meeting the growing demand for electricity to ensure the delivery of reliable power throughout the City. By 2045, LADWP plans to build additional distributing substation capacity to provide load relief for existing distributing substations and meet forecasted capacity needs in stressed service areas. The construction of new distributing substations is not intended to replace existing substations. Rather, new stations would be constructed to alleviate overloaded stations, respond to increased demand, and enhance distribution system reliability. Existing substations in the service areas with proposed new distributing substations would continue to operate based on factors such as operational redundancy, safety, and cost-benefit analysis.

Currently, all distributing substations within the City are 4.8kV stations, meaning the voltage from the distributing substation toward end users is 4.8kV. Under the Proposed Program, LADWP is considering the construction of both 4.8kV and 12kV distributing substations. A 12kV distributing substation can provide greater service capacity using fewer components than a 4.8kV station. For example, a 12kV distributing substation with three transformer banks, twelve feeders, and no voltage regulators can provide more capacity than a fully built-out 4.8kV station containing five transformer banks, thirty-two feeders, and sixty-four voltage regulators. As a result, incorporating 12kV stations into the distribution system would reduce network complexity and allow for smaller distributing substation footprints. Additionally, 12kV distributing substations would reduce power losses on the distribution lines, allow the circuits to carry larger customers, and support electrification by allowing an easier interconnection of EV charging and cogeneration. It would also require less excavation outside of the substation footprint as fewer distribution lines would be needed compared to a 4.8kV station.

1.4 Project Location and Setting

1.4.1 Service Areas

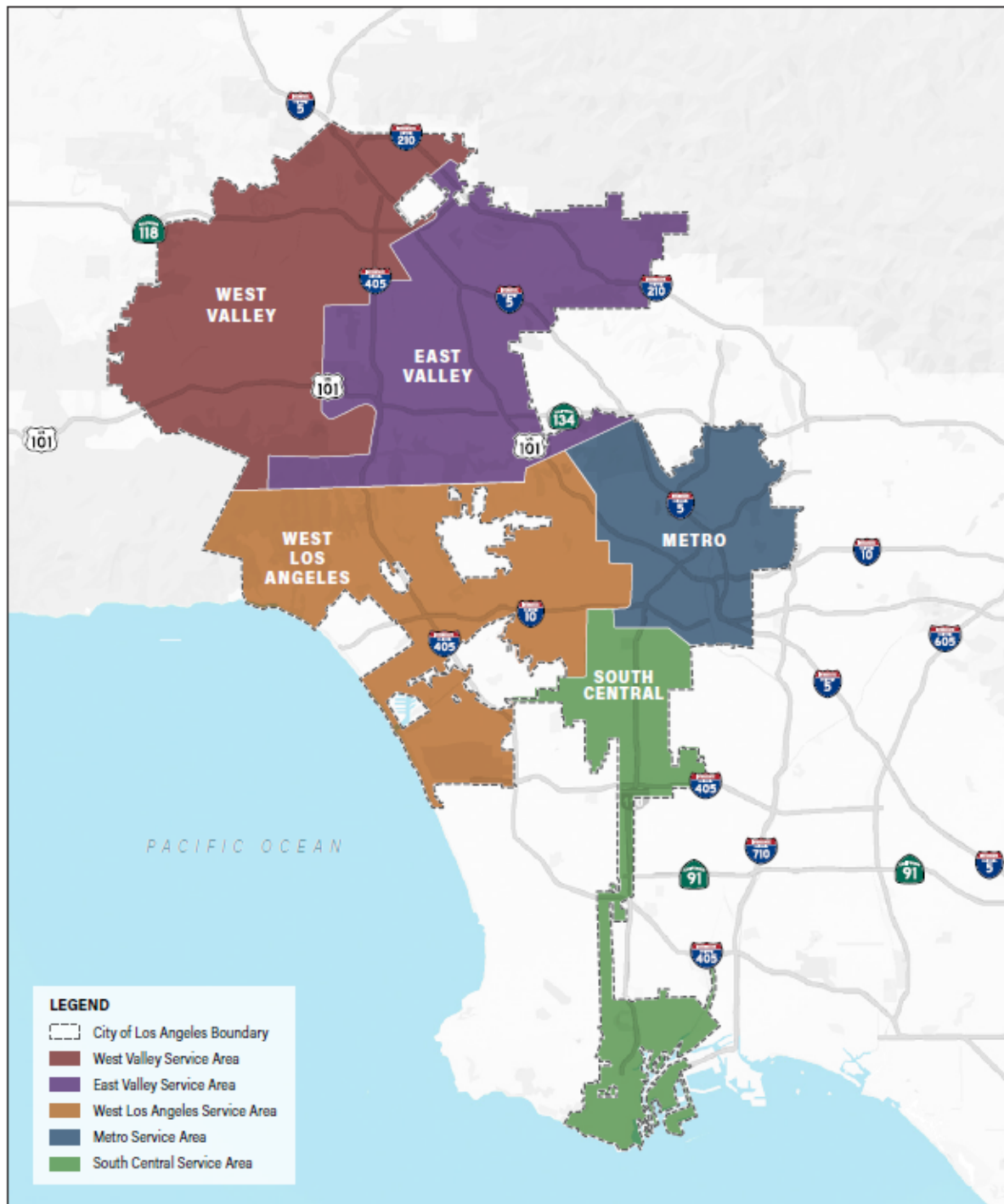
The LADWP in-basin distribution system is divided into five primary service areas: West Valley, East Valley, Metro, West Los Angeles (West LA), and South Central, as shown in Figure 3.

The West Valley service area is generally located in the northwestern portion of the City and covers approximately 65 square miles. It serves approximately 249,000 customers in the following communities: Encino, Tarzana, Lake Balboa, Reseda, West Van Nuys, Canoga Park, Winnetka, Woodland Hills, West Hills, Northridge, Sherwood Forest, Chatsworth, Porter Ranch, Granada Hills, Knollwood, Sylmar, Mission Hills, and North Hills. There are four receiving substations, 25 distributing substations, and two pole-top transformer racks in the West Valley service area.

The East Valley service area is generally located in the northeastern portion of the City and covers approximately 85 square miles. It serves approximately 278,000 customers in the following communities: Sunland, Tujunga, Lakeview Terrace, Shadow Hills, East La Tuna Canyon, Sun Valley, La Tuna Canyon, Arleta, Pacoima, Hansen Hills, Panorama City, Van Nuys, Sherman Oaks, Valley Glen, North Hollywood, Valley Village, Sherman Oaks, Studio City, Toluca Lake, and the Cahuenga Pass. There are three receiving substations, 25 distributing substations, and 16 pole-top transformer racks in the East Valley service area.

The Metro service area is generally located in the eastern-central portion of the City and covers approximately 45 square miles. It serves approximately 228,000 customers in the following communities: Los Feliz, East Hollywood, Griffith Park, Atwater Village, Cypress Park, Eagle Rock, El Sereno, Garvanza, Glassell Park, Highland Park, Hermon, Lincoln Heights, Montecito Heights, Monterey Hills, Mount Washington, Angelino Heights, Echo Park, Elysian Heights, Elysian Park, Elysian Valley, Historic Filipinotown, Silver Lake, Pico-Union, Rampart Village, Westlake, Arts District, Chinatown, Civic Center, Fashion District, Financial District, Little Tokyo, Historic Core, Skid Row, Victor Heights, and Boyle Heights. There are four receiving substations, 22 distributing substations, and four pole-top transformer racks in the Metro service area.

The West LA service area is generally located in the western-central portion of the City and covers approximately 60 square miles. It serves approximately 452,000 customers in the following communities: Leimert Park, Jefferson Park, Mid-City, West Adams and Arlington Heights, Beverly Grove, Carthay, Country Club Park, Hancock Park, Koreatown, Larchmont, Mid-City, Miracle Mile, Wilshire Center, Wilshire Park, Windsor Square, and Windsor Village, Hollywood, Laurel Canyon, Laurel Hills, Lookout Mountain, Wonderland Park, Coldwater Canyon, Franklin Canyon, Benedict Canyon, Beverly Glen, Casiano Estates, Glenridge, Roscomare Valley, Bel Air Crest and Summitridge, Brentwood, Pacific Palisades, Westwood, West Los Angeles, Century City, Pico-Robertson, Cheviot Hills, Rancho Park, and Sawtelle, Palms, Mar Vista, Del Rey, Venice, Westchester, Playa del Rey, Playa Vista, and Los Angeles International Airport. There are six receiving substations, 33 distributing substations, and five pole-top transformer racks in the West LA service area.



Source: Google Earth Pro, March 2026



NOT TO SCALE

Distribution System Service Areas

Figure 3

The South Central service area is located in the southern portion of the City and covers approximately 85 square miles. It serves approximately 224,000 customers in the following communities: University Park, Adams-Normandie, Harvard Heights, West Adams Heights, Kinney Heights, Jefferson Park, Vermont Square, Vermont-Knolls, Central, Avalon, Green Meadows, Watts, Harbor Gateway, Wilmington, Harbor City, Hyde Park, Port of Los Angeles, Point Fermin, the Palisades, Vinegar Hill, and Rancho San Pedro. There are four receiving substations, 18 distributing substations, and seven pole-top transformer racks in the South Central service area.

1.4.2 Project Location for New Distributing Substations

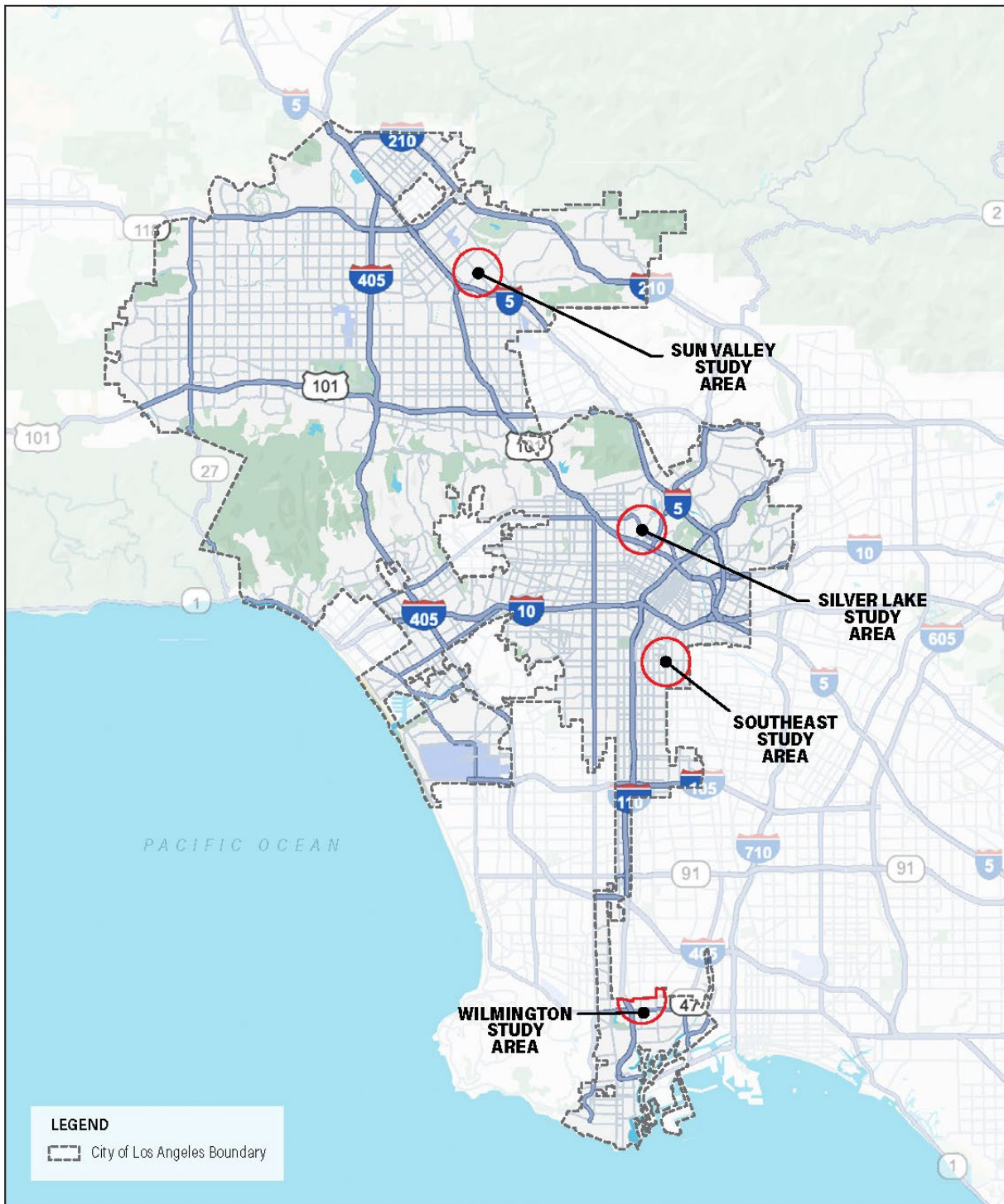
The Proposed Program includes four areas of consideration (herein referred to as study areas) for the four new proposed distributing substations: Sun Valley, Silver Lake, Southeast, and Wilmington. Each study area is defined by an approximate one-mile-radius around a location that was identified by LADWP as an ideal operational location for a new distributing substation, without regard for the physical, environmental, and other constraints that must be considered in the selection of an actual preferred location. Figure 4 shows the study areas for the proposed new distributing substations.

The Sun Valley Study Area, as shown in Figure 4a, is defined by a one-mile radius extending from the intersection of San Fernando Road and Sheldon Street. The Sun Valley Study Area is located in the LADWP East Valley service area and primarily within the Department of City Planning Sun Valley-La Tuna Canyon Community Plan area. The Sun Valley Study Area is characterized by low-density residential, light and heavy manufacturing uses, open space, and public facilities. It is serviced by existing distributing substations DS-67, DS-80, DS-101, and DS-102, all of which are located outside the boundaries of the study area.

The Silver Lake Study Area, as shown in Figure 4b, is defined by a one-mile radius extending from the intersection of Sunset Boulevard and Silver Lake Boulevard. The Silver Lake Study Area is located in the LADWP Metro service area and primarily within the Department of City Planning Silver Lake-Echo Park-Elysian Valley Community Plan area. The Silver Lake Study Area is characterized by low- to medium-density residential uses, including hillside development, and commercial uses. It is serviced by existing distributing substations DS-15, DS-26, and DS-54, all of which are located at the periphery of or outside the boundaries of the study area.

The Southeast Study Area, as shown in Figure 4c, is defined by a one-mile radius extending from the intersection of Vernon Avenue and Central Avenue. The Southeast Study Area is located in the LADWP South Central service area and in the Department of City Planning Southeast Los Angeles Community Plan area. The Southeast Study Area is characterized by a mix of community commercial and low- to medium-density residential uses, with industrial uses toward the periphery of the area. It is serviced by several of the oldest distributing substations in the system, including DS-5 (1918), DS-19 (1926), and DS-32 (1937), all of which are located at the periphery of or outside the boundaries of the study area.

The Wilmington Study Area, as shown in Figure 4d, is defined by a one-mile radius extending south of Lomita Boulevard from the intersection of Wilmington Boulevard and Lomita Boulevard (areas north of Lomita Boulevard are located outside the City of Los Angeles and would not be developed under the Proposed Program). The Wilmington Study Area is located in the LADWP South Central service area and in the Department of City Planning Wilmington-Harbor City Community Plan area. The Wilmington Study Area is characterized by low- and medium-density residential, commercial, open space, public facilities, and limited light manufacturing uses. It is serviced by existing distributing substations DS-51, DS-106, and DS-123, all of which are located well outside the boundaries of the study area.



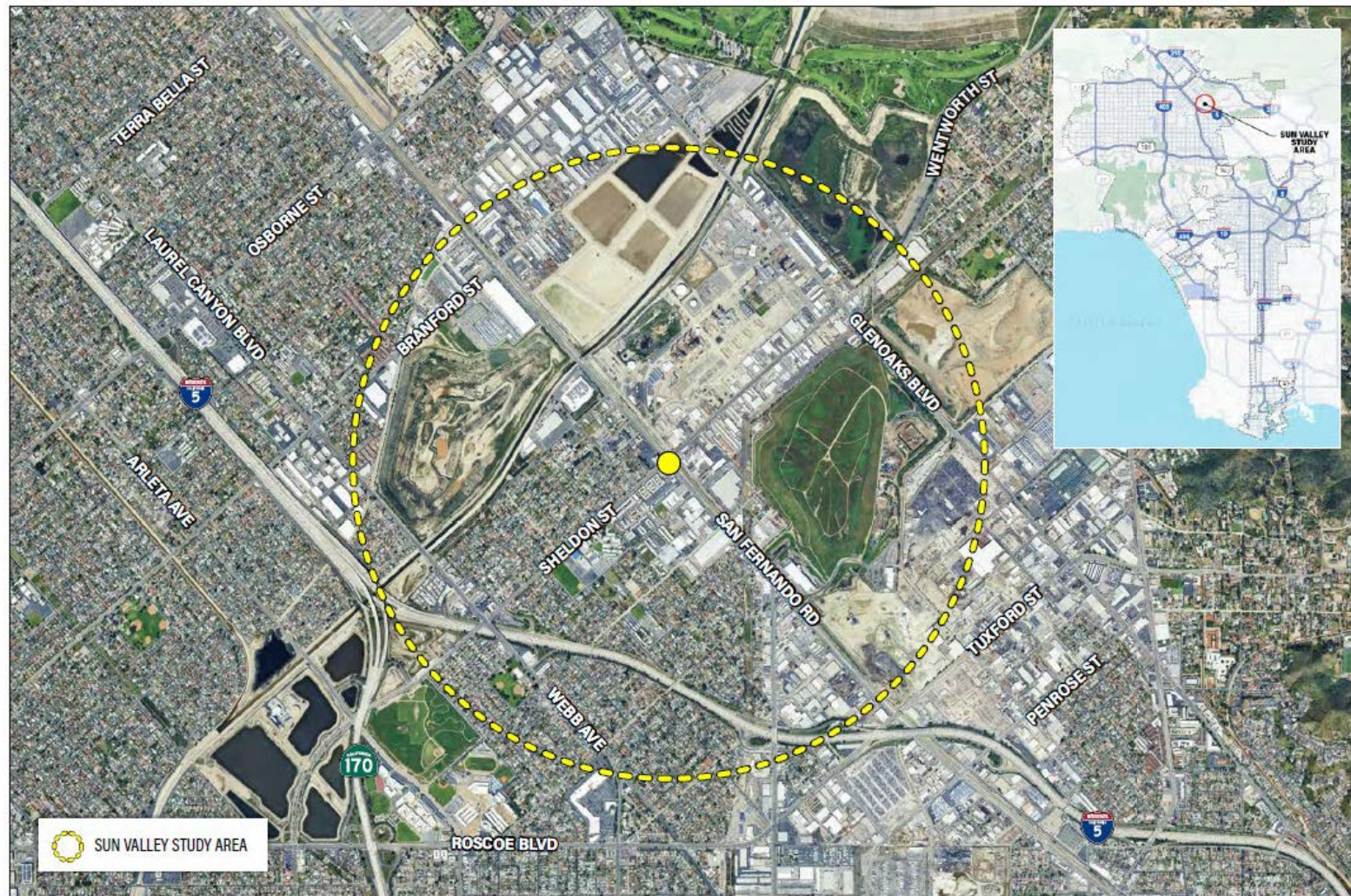
SUBSTATION PROGRAM

Study Areas for Proposed
New Distributing Substations

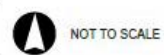
Figure 4



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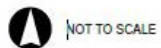
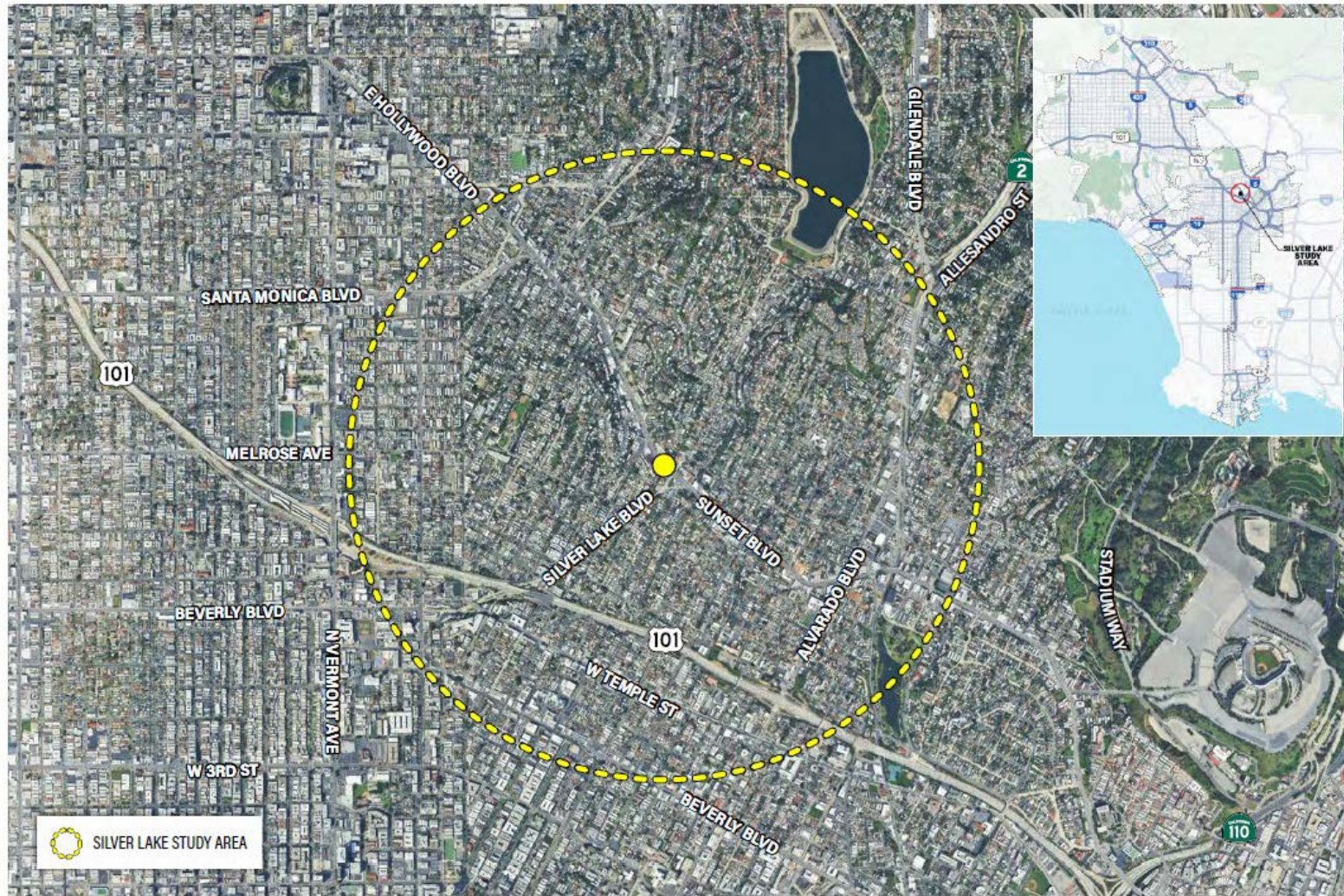


Source: Google Earth Pro, January 2026



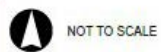
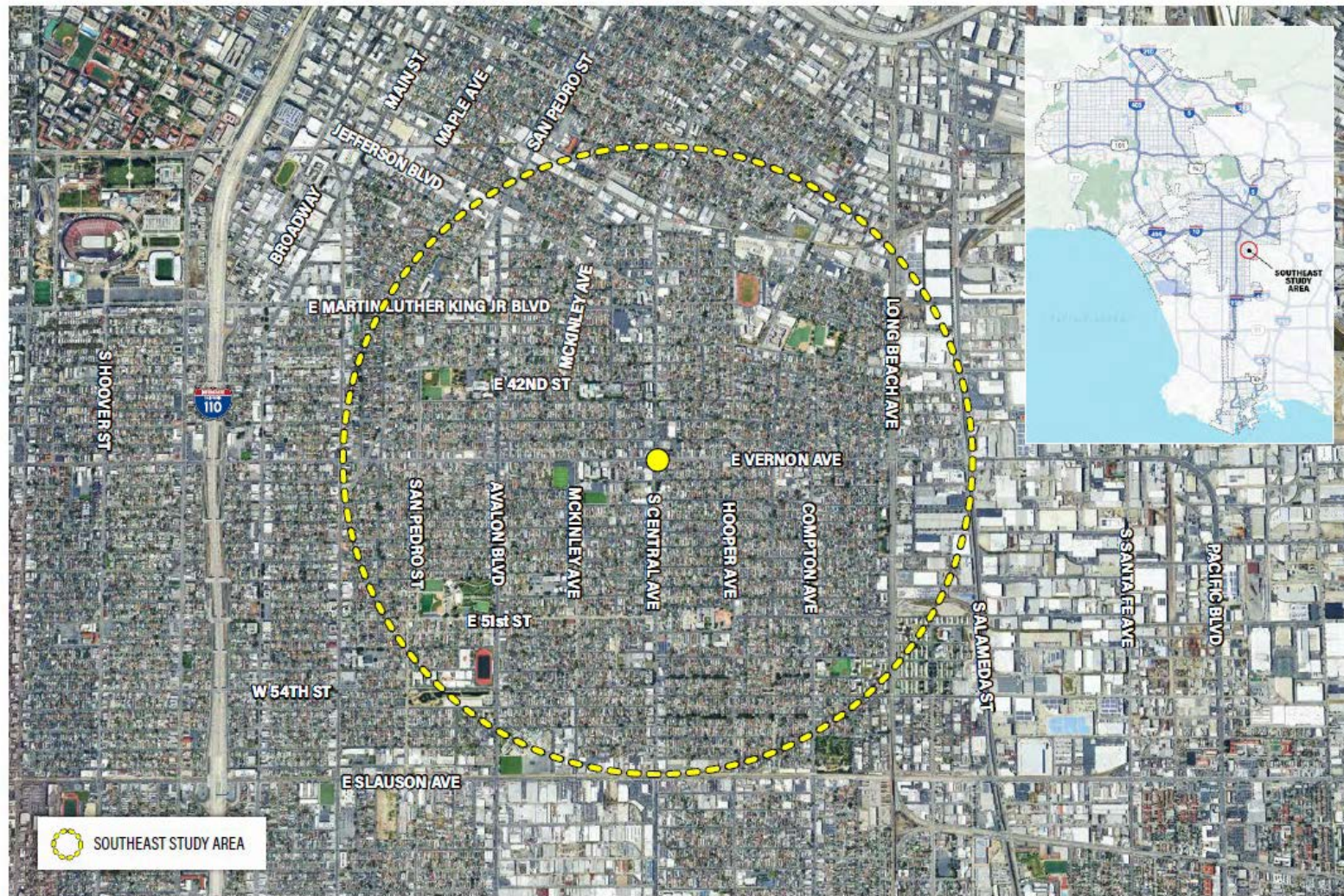
SUBSTATION PROGRAM
Sun Valley Study Area

Figure 4a



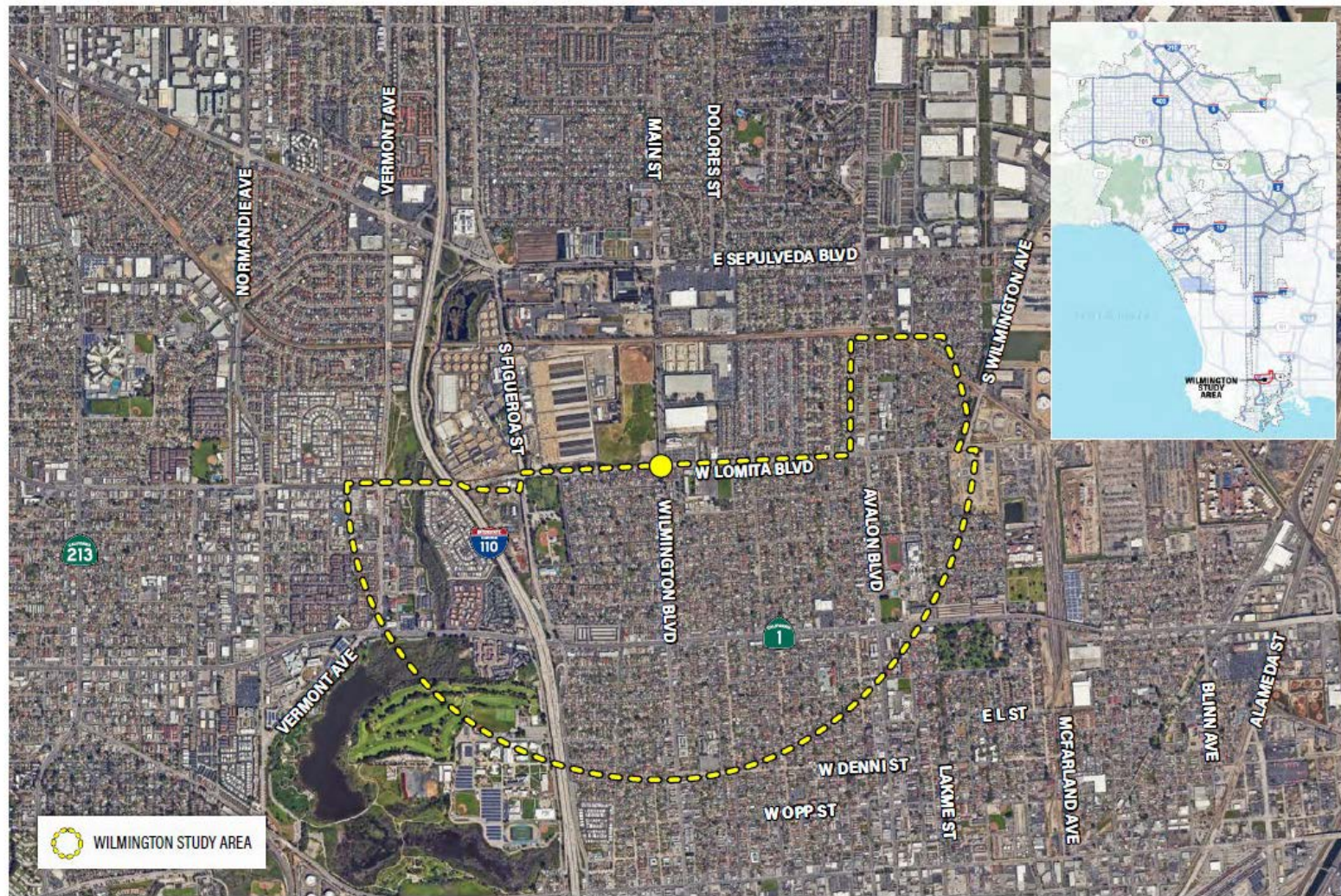
SUBSTATION PROGRAM
Silver Lake Study Area

Figure 4b



SUBSTATION PROGRAM
Southeast Study Area

Figure 4c



Source: Google Earth Pro, January 2026



SUBSTATION PROGRAM
Wilmington Study Area

Figure 4d

1.5 Description of Proposed Substation Program

The Proposed Program analyzes planned improvements to the LADWP distribution system through the planning horizon year 2045. The Proposed Program includes the following components: construction of new distributing substations (new development), expansion of existing substations which would extend beyond the existing substation footprint (expansion), minor improvements to existing substations (minor improvements), and other distribution system improvements. New development (i.e., the construction of the four new distributing substations) will be analyzed in detail due to their size and level of construction effort or type of construction activities. Generally, the analysis of these projects would include quantitative analysis of impacts, where appropriate. Expansions are defined as projects that would require work outside of the existing substation equipment footprint; depending on the scope of the project, expansions may have similar levels of construction as new development and may include quantitative analysis of impacts, as appropriate. Minor improvements are defined as projects that are smaller in size and have a lower level of construction effort (i.e., minimal ground disturbance, shallow excavation, shorter construction duration, fewer pieces of heavy construction equipment, fewer number of on-site daily workers). Minor improvements would generally be analyzed at a qualitative level and would typically be exempt from CEQA due to their limited scope and the low level of construction activity involved. Other distribution system improvements are defined as activities that are associated with the construction of a new distributing substation and expansion of existing substations, as well as the activities that would optimize the distribution system. Depending on the type of improvement activity, other distribution system improvements may include quantitative analysis of impacts, as appropriate, or could also be exempt from CEQA due to the limited scope and low level of construction activity involved.

Each component of the Proposed Program is further defined as follows:

- **New development:** Involves acquisition of real estate to construct a new distributing substation. Involves major construction activities using heavy equipment, including, for example, excavation, foundations, cabling, and, if necessary, demolition.
- **Expansion:** Involves the permanent installation of new equipment which would extend beyond the existing substation footprint and could involve acquisition of real estate. Involves moderate to major construction activities using heavy equipment, including, for example, excavation, foundations, cabling, and, if necessary, demolition.
- **Minor Improvement:** Involves the permanent installation of equipment within the existing substation property, replacement of existing equipment, modernization of equipment, addition of new equipment to vacant positions to meet the design capacity of the existing substation, as well as substation physical protection and security upgrades. Involves minimal construction effort, including minimal ground disturbance, shallow excavation, shorter construction duration, fewer pieces of heavy construction equipment, and fewer number of on-site daily workers.
- **Other Distribution System Improvements:** Involves upgrades to existing subtransmission lines, feeders, and underground cables, removal of existing pole-top transformer racks, deactivation of existing distributing substations, as well as other ancillary improvements.

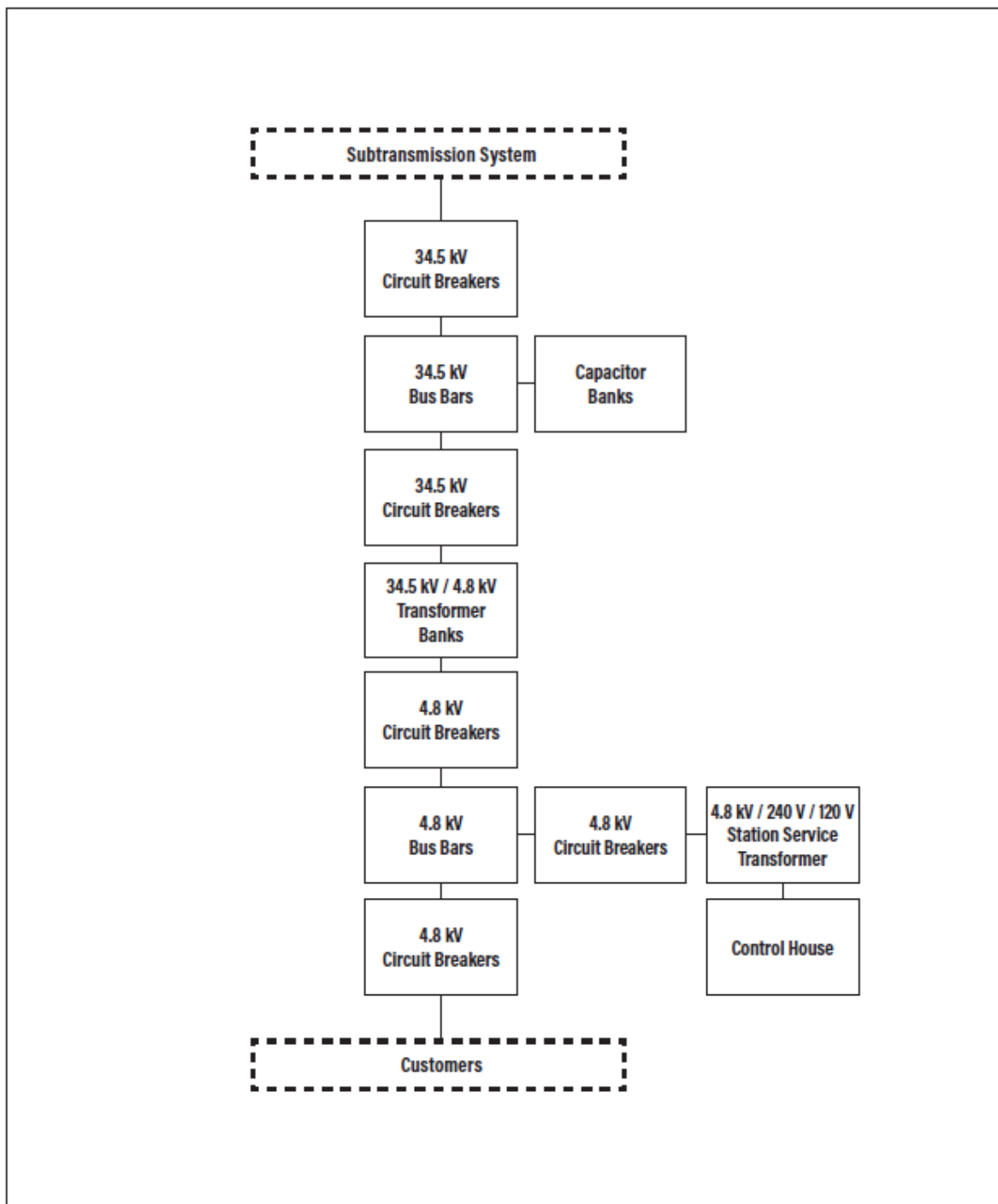
1.5.1 New Development

LADWP has identified four geographic areas of concern in need of new distributing substations to be constructed through the planning horizon year 2045: Sun Valley Study Area, Silver Lake Study Area, Southeast Study Area, and Wilmington Study Area. The need for new distributing

substations at these locations is based on several factors, including projected increases in electricity demand; the need for increased system reliability; and the infeasibility of addressing these needs through improvements to existing distributing substations serving the area. New distributing substations are needed because other improvements are not feasible or would not substantially alleviate projected capacity shortfalls in an area.

General Characteristics of New Distributing Substations

New distributing substations would be designed to increase reliability in the distribution system and avoid projected capacity shortfalls in the four study areas. Each new distributing substation would require an approximately 25,000-square-foot site, have a design capacity ranging from 32 to 90 MVA, and would either be 4.8kV, similar to existing distributing substations, or 12kV. The new distributing substation would consist of facilities where all equipment would be enclosed. The station would be approximately 25 feet tall at maximum. Exterior walls of the stations would be designed to be compatible with the character of surrounding uses and visually shield interior equipment at the street level. Although an open-air design is preferable for ease of maintenance access and greater flexibility when exchanging equipment, roofs could be included to further shield equipment from view in areas where high visibility into the station from adjacent sensitive uses might occur. Standard equipment installed at each new distributing substation would include busbars, circuit breakers, transformers, feeders, disconnect switches, capacitor banks, voltage regulators, heating/ventilation/air conditioning (HVAC) units, and a control house. The substations would be unmanned and would be remotely monitored via a Supervisory Control and Data Acquisition (SCADA) system. In addition, ongoing maintenance and system testing involving personnel visits to the substation would occur regularly. Figure 5 shows the conceptual layout of equipment in a distributing substation.



SUBSTATION PROGRAM

Conceptual Layout for Distributing Station Equipment

Figure 5



1.5.2 Improvements to Existing Substations

Proposed improvements to existing substations would consist of expansions and minor improvements.

Expansions

The Proposed Program would include the expansion of existing receiving and/or distributing substations, extending beyond the current substation footprint.

Expansions would involve the permanent addition of new equipment that would be installed outside of the existing substation footprint. The expansion proposed would depend on the size and configuration of the existing substation and design of the expansion. Some expansions may occur within the existing parcel boundary for the substation; however, in some cases, an expansion may require acquisition of one or more adjacent properties. Expansions of existing receiving substations may require up to an approximately 40,000-square-foot site while distributing substations may require up to an approximately 25,000-square-foot site. New equipment would be enclosed, and the exterior walls of the expansion would be designed to be compatible with the character of the surrounding area. Although an open-air design is preferable for ease of maintenance access and greater flexibility when replacing equipment, roofs could be included to further shield equipment from view in areas where high visibility into the station from adjacent sensitive uses might occur.

Receiving substation expansions generally involve the same equipment as distributing substation expansions, with the primary differences being equipment size and spacing. Equipment for receiving substation expansions could include switchgears, circuit breakers, busbars, circuit positions, transformers, and capacitor banks. Equipment for distributing substation expansions could include switchgears, circuit breakers, busbars, transformers, feeders, and capacitor banks. Any new equipment would be monitored via a SCADA system, similar to equipment at newer existing substations. Once the new equipment is installed in the existing or adjacent property, modernization of the existing substation could also occur to increase capacity and improve safety. Modernizing the existing substation could include installation of new switchgear enclosures, transformers, conductors, control panels, relays, and equipment.

Activities may generally include:

- Extending the walls or building enclosures
- Reconfiguring or installing new 230kV, 138kV, and/or 34.5kV racks
- Installing new equipment, including but not limited to: transformer banks, capacitor banks, circuit breakers, voltage regulators, switchgears, and/or control house
- Remodeling the control room to improve system protection and adding communication equipment to improve visibility and control
- Adding electrical equipment for grounding, fire protection, and/or system protection
- Modifying existing buildings or adding structures to improve resilience to climate and wildlife
- Moving existing power loads to the new substation equipment to provide overload relief

The expansion of existing substations would not generally replace other existing substations in

an area. Rather, the expansion would be constructed to address safety concerns and enhance reliability in the distribution system. The other existing substations would continue to operate and serve the area based on factors such as operational redundancy, safety, and cost-benefit analysis.

Minor Improvements

Under the Proposed Program, minor improvements at existing substations would result in conditions essentially the same as existing conditions. Minor improvements typically require minimal construction and/or ground-disturbance, primarily within the existing substation footprint. Minor improvements would include modernizing equipment, replacing equipment, and adding equipment to vacant positions. When constructing a substation, not all equipment included in the original design may have been installed; instead, equipment is installed as demand increases. As such, adding equipment at vacant positions would allow an existing substation to reach its design capacity. Equipment may include, but is not limited to, transformer banks, circuit breakers, switchgears, cables, conductors, buses, capacitor banks, battery systems, regulators, protection and control equipment, and other ancillary equipment. Typically, existing equipment is disconnected and loaded onto a haul truck for disposal. New equipment would be delivered to the substation and connected to existing equipment or cables. Occasionally, shallow trenching would be required to connect the new equipment to the existing lines within the substation. Activities may generally include:

- Adding equipment to positions that are vacant
- Replacing and/or swapping old equipment
- Reconfiguration of existing equipment
- Transferring loads
- Construction of precast concrete perimeter walls or fencing
- Construction of drainage features
- Adding electrical equipment for grounding, fire protection, and/or system protection

Minor improvements would result in increased safety as modern equipment would replace outdated equipment that may not meet current standards at older substations. Additionally, minor improvements would include substation physical protection and security upgrades that would occur outside of the substation footprint but within the substation property. These improvements would eliminate or mitigate potential physical threats to daily operation of substations to help maintain grid reliability.

1.5.3 Other Distribution System Improvements

Subtransmission Lines and Feeders

As discussed in Section 1.3, Project Background, high voltage transmission delivers electricity via overhead lines or underground cables to receiving substations where the voltage is stepped down to 34.5kV. Overhead and underground distribution (i.e., 34.5kV subtransmission) lines from the receiving substations then carry electricity to large end-users and/or distributing substations, which further reduce the voltage from 34.5kV to 4.8kV. The electricity is then carried out of the distributing substation through feeders to end users.

Feeders can typically serve a two-mile radius. Beyond two miles, power losses are higher, and

power quality and voltage stability decrease. As new distributing substations are implemented, feeders become electrically shorter, which reduces power losses, and improves power quality and voltage stability.

With the construction of a new distributing substation or expansion of an existing substation, the existing 34.5kV subtransmission system may need to be modified or upgraded. This may involve upgrading existing and extending new subtransmission lines to supply the new distributing substation and installing new feeder lines, which would occur as part of each specific project, as necessary. In addition, upgrading existing and extending new subtransmission and feeder lines could also occur independent of construction of a new distributing substation or expansion of an existing substation. For example, a new commercial development in an area without nearby LADWP circuits would need a line extension to receive service. Standalone line extensions could also be installed for reliability reasons. These activities typically provide LADWP with the opportunity to perform other related reliability improvements.

Such improvements include:

- Balancing distribution circuits and network to improve power flow
- Replacing cables and conductors to increase circuit capacity
- Updating system redundancy and switching to improve operational flexibility
- Replacing aging or obsolete equipment that is otherwise functional and lower in the work queue
- Incorporating advanced technologies (i.e., remote monitoring and switching)

These improvements would increase reliability of electric service to customers in the area by making electrical infrastructure more resilient to and able to recover faster from outage events.

If an extension of an existing line is required to serve the new distributing substations, LADWP would install them underground to be less visually obtrusive. To install the lines underground, trenching would be required in public rights-of-way and/or existing utility easements.

Removal and Deactivation of Existing Infrastructure

Program activities could include the removal of pole-top transformer rack equipment, which could occur after new distributing substations are operational and loads are shifted. Additionally, although unlikely, the Proposed Program could include deactivating existing distributing substations by de-energizing equipment based on factors such as operational redundancy, safety, and cost-benefit analysis. Demolition of existing distributing substations or receiving substations would not occur as part of the Proposed Program.

While some pole-top transformer racks may remain in place to provide redundancy, removal of pole-top transformer rack equipment could be possible with the addition of new distributing substations or expansion of existing distributing substations to the system. The new or expanded distributing substation would alleviate electrical loads on existing facilities and enable the removal of certain pole-top transformer rack equipment that have been installed to temporarily make up for limits of the existing distributing substations. To remove pole-top transformer rack equipment, crews would ensure that the load is transferred to another source and lines are de-energized and removed. Cranes and bucket trucks would be utilized to remove

transformers and auto reclosers before dismantling the platform. Once the platform is removed, steel poles would be disassembled and pulled out of the ground. If the pole is installed in a sidewalk, the concrete would be restored.

Ancillary Improvements

Ancillary improvements to the distribution system could be undertaken concurrently with the construction of new distributing substations and expansion of existing substations. Coordinating these supporting upgrades with construction activities associated with new distributing substations and expansion existing substations would allow for more efficient use of resources than completing them separately. These supporting upgrades may be implemented to facilitate automation, telemetry, outage detection, and system protection.

Ancillary activities may include:

- Installing communication network lines within new or expanded underground duct bank systems.
- Incorporating advanced metering infrastructure or distribution automation equipment.
- Undergrounding overhead conductors or installing covered overhead conductors.

1.6 Project Construction

1.6.1 New Development

Construction of the four new distributing substations is expected to commence in 2030 with completion anticipated in 2041. Each station is expected to require approximately three years to construct. Based on priority, need, and property acquisition, it is projected that construction of the first distributing substation would span 2030 through 2032. Construction of the second distributing substation would span 2033 through 2035. Construction of the third distributing substation would span 2036 through 2038. Construction of the fourth distributing substation would span 2039 through 2041. Construction of the four new distributing substations is planned to occur sequentially and would be based on the availability of construction resources (i.e., equipment and crew). Construction would include site preparation; foundations and structures, which includes building the foundation (a copper ground grid) and constructing underground duct banks and pull boxes, concrete pads, and walkways; installation, which includes securing switchgear and transformer equipment, connecting cables, construction of the control house; and finishing. Testing and commissioning of equipment in the new distributing substation would follow.

Each of the distributing substations would be constructed according to an individual schedule that would involve a lower level of activity during project initiation, an increase of activity over time, and a tapering of activity as tasks near completion and the distributing substation enters the commissioning and construction closeout phases.

Temporary lane closures may be required during construction. It is anticipated that site-specific traffic control plans would be prepared for review and approval by the City of Los Angeles Department of Transportation (LADOT) prior to construction of each distributing substation and would include such measures as warning signage, speed limits, detours, and flag persons as necessary to minimize disruptions to traffic.

1.6.2 Improvements to Existing Substations

Expansions

As discussed in Section 1.5.2, the construction of an expansion would depend on the size and configuration of the existing substation property and design of the expansion. The construction activity scenario conservatively assumes that a proposed receiving substation expansion could require up to a 40,000 square-foot site. For a distributing substation, the construction scenario assumes an expansion could require up to a 25,000 square-foot site, similar to the space required for a new distributing substation. To accommodate such expansions, activities could include demolition of existing obsolete equipment, which would allow room for installation of modern switchgear equipment, increasing capacity and improving safety of the substation.

Construction activities of a receiving substation expansion would require site preparation, which may involve removal/disposal of existing material, importing site fill material, compaction, and grading; foundation and structures, which may include trenching and excavation, installing conduit, piers, and foundations; and installation, which may include installing a ground grid, racks, breakers, switches, relays, and other equipment. Testing and commissioning of the new equipment installed would follow. Construction activities would be more intensive than new development of a distributing substation, as described above because the space required and equipment needed for a receiving substation expansion is larger. It is conservatively assumed that an expansion of a receiving substation would require more ground disturbance, truck trips (vendor and haul), and daily average workers than construction of a new distributing substation. It is assumed that the overall construction duration would be the same (up to three years to construct) as a new distributing substation. Temporary lane closures during expansions for substations may also be required during construction and would require the preparation of site-specific traffic control plans for review and approval by LADOT.

Construction activities for a distributing substation expansion would include site preparation which may require demolition of existing buildings on-site, if necessary; foundations and structures, which includes building the foundation (a copper ground grid) and constructing underground duct banks and pull boxes, concrete pads, and walkways; installation, which includes securing switchgear and transformer equipment, connecting cables, improvements to the control house; and finishing. Testing and commissioning of the new equipment installed would follow. The construction scenario for expansion of an existing distributing substation assumes that the expansion would be up to the same size as a new distributing substation. Thus, construction activities, durations, and intensity for each construction phase would be similar to new development, as described above. Temporary lane closures during expansions for substations may also be required during construction, and would require the preparation of site-specific traffic control plans for review and approval by LADOT.

Following the expansion of an existing substation, the existing substation may be renovated and modernized.

Minor Improvements

Construction for ongoing minor improvements would occur throughout the life of the Program. The duration of activities for improvements would vary and may last up to 6 months for foundations and structures, installation, and testing and commissioning. Minor improvements typically require minimal construction effort, including minimal ground disturbance and primarily into already disturbed areas, shallow excavation, short construction durations (i.e., up to 6 months), a few pieces of heavy construction equipment, and 10 on-site daily workers on

average. Occasionally, modifications to existing foundations, walls, steel racks, conduit, and trenching systems may be required to accommodate replacement or reconfiguration of existing equipment.

1.6.3 Other Distribution System Improvements

Subtransmission Lines and Feeders

As discussed in Section 1.5.3, substations are connected to the existing power grid through overhead lines and underground cables. With the construction of new distributing substations and expansion of existing substations, subtransmission lines and feeders would potentially need to be extended, the length of which would depend on the location of the new distributing substation or existing substation. Typical line extensions to provide an additional circuit to feed a new or expanded distributing substation may range from 500 feet to 10,000 feet. For receiving substations, line extensions can reach up to 16,000 feet. In addition, upgrading existing and extending new subtransmission and feeder lines could also occur independent of construction of a new distributing substation or expansion of an existing substation.

LADWP would install new or extend subtransmission lines and feeders underground within public road rights-of-way or within existing utility easements using open-trench construction methods. The general process for open-trench construction consists of utility clearance, site preparation, excavation, shoring as necessary, conduit installation, backfilling, and work site restoration. Construction would require on-site and off-site staging areas for temporary storage of supplies, materials and equipment. Any disturbed roadways would be paved and restriped, and any disturbed surfaces would be restored to pre-construction conditions. Soils excavated would be hauled to off-site disposal areas. Rolling partial lane closures would be required for installation of conduit within a road right-of-way, and a traffic control plan would be implemented.

The size of the trench, which may range between 2.5 feet and 10 feet in depth, and number of duct banks would be based on the number, size, and length of conduits, that would be required. Construction would typically occur within an approximately 800- to 1,000-foot work area, within traffic lanes. Construction would progress along the alignment instead of being constructed all at once. Typically, the duration of activities to extend subtransmission lines and feeders may last up to 9 months for foundations and structures, installation, and circuit construction outside of the substation (conduit, cable, and overhead work), which would be followed by testing and commissioning. These activities would occur concurrently with substation construction.

Temporary lane closures for construction of new subtransmission lines and feeders underground within public road rights-of-way would be required during construction. It is anticipated that site-specific traffic control plans would be prepared for review and approval by the LADOT prior to construction of subtransmission lines and feeders and would include measures to minimize disruptions to traffic.

Removal and Deactivation of Existing Infrastructure

As discussed in Section 1.5.3, additional activities could include the removal of pole-top transformer rack equipment. Additionally, although unlikely, activities could also include deactivating existing distributing substations by de-energizing equipment.

To remove pole-top transformer rack equipment, crews would ensure that the load is transferred to another source before lines are de-energized and removed. One crane and one bucket truck

would be utilized to remove transformers and auto reclosers before dismantling the platform. Once the platform is removed, steel poles would be disassembled, pulled out of the ground, and hauled away with a dump truck. If the pole is installed in a sidewalk, the concrete would be restored, requiring an asphalt truck. Temporary lane closures during removal of pole-top transformer rack equipment may be required during construction.

Deactivation of existing distributing substations in-place would involve transferring all load to another distributing substation, de-energizing, grounding and tagging electrical equipment, securing or boarding up entrances and windows, locking all gates and access points, and updating records to reflect the station's deactivation. The typical duration to deactivate an existing station is approximately two weeks and would require up to 10 workers.

1.7 Project Operation

Under existing conditions, the operation of substations is largely automated and is remotely monitored via a SCADA system. The SCADA system allows for remote control and monitoring communications by the Energy Control Center, a central command center for LADWP.

Periodic inspections are conducted per regular LADWP inspection cycles. Scheduled equipment inspections include, but are not limited to, power transformers, circuit breakers, voltage regulators, relays, batteries, and ancillary equipment. In addition, maintenance activities are performed at regular intervals if substation equipment has reached a certain age or number of operations. Such activities include regular visits as well as annual scheduled maintenance, typically from one to seven days in duration. Testing of fire protection equipment is also performed annually.

Occasionally, substation operators and substation maintenance and testing personnel respond to outages at the substation where operators isolate affected equipment and maintenance personnel inspect and determine restoration steps. However, this is a rare occurrence and happens infrequently.

The operation of a new distributing substation would be similar to the operation of an existing substation. A new distributing substation would consume approximately 15,000 kilowatt hours of energy annually. The operation of existing substations that are expanded or have minor improvements under the Proposed Program would be similar to existing operations and result in a negligible change in energy consumption due to modernization and operational efficiencies. Expansions would not result in the need for additional employees or vehicle trips to the existing substations.

2 ENVIRONMENTAL DETERMINATION

The following discussion of potential environmental effects was completed in accordance with Section 15063(d)(3) of the CEQA Guidelines (2026) to determine if the Proposed Program may have a significant effect on the environment.

CEQA INITIAL STUDY FORM

Project Title:

Substation Program

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:

Jazmin Martin
Environmental Planning and Assessment
Los Angeles Department of Water and Power
(213) 367-1768

Project Sponsor's Name and Address:

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

City Council District:

The Proposed Program would be located in the LADWP in-basin area, which encompasses the City of Los Angeles and all 15 City Council Districts. Specifically, the Sun Valley Study Area is primarily located in Council District 6 with a small area in the northwest portion located in Council District 7. The Silver Lake Study Area is primarily located in Council District 13 with a small area in the northern portion located in Council District 4. The Southeast Study Area is located in Council District 9. The Wilmington Study Area is located in Council District 15.

Neighborhood Council:

Multiple

Project Location:

The Proposed Program would be located in the LADWP in-basin area, which encompasses the City of Los Angeles. The Proposed Program also includes four areas of consideration for the new proposed distributing substations: the Sun Valley Study Area, Silver Lake Study Area, Southeast Study Area, and Wilmington Study Area. Potential expansions would be located within existing substation properties or, if needed, adjacent acquired property. Minor improvements at existing substations would be limited to the existing substation property. Other distribution system improvements would be located along existing road rights-of-way, utility easements, or at sites containing existing distribution system infrastructure.

General Plan Designation:

The general plan designation of the potential parcels for new development and expansions, if into adjacent acquired property, is unknown. The general plan designation of the parcels containing existing substations for minor improvements varies. Other distribution system improvements would be located along existing road rights-of-way, which are generally designated by the Mobility Plan 2035 and include circulation classifications, and utility easements or sites containing existing distribution system infrastructure, which occur on parcels with various general plan designations.

Zoning:

The zoning designation of the potential parcels for new development and expansions, if into adjacent acquired property, is unknown. The zoning designation of the parcels containing existing substations for minor improvements varies. Other distribution system improvements would be located along existing road rights-of-way, which typically do not have zoning designations, and utility easements or at sites containing existing distribution system infrastructure, which occur on parcels with various zoning designations.

Description of Project:

The Proposed Program would modernize LADWP's electrical distribution system by constructing new distributing substations and improving existing substations, including both distributing substations and receiving substations. These efforts are necessary to meet projected increases in electricity demand driven by increased population density within existing service areas, growth of energy-intensive industries, and the electrification of functions currently powered by the combustion of fossil fuels. The Proposed Program analyzed in this Initial Study includes the construction of four new distributing substations (new development), expansion of existing substations which would extend beyond the existing substation footprint (expansion), minor improvements to existing substations (minor improvements), and other distribution system improvements. These activities are expected to occur through the planning horizon year 2045.

The new distributing substations would each consist of an enclosed substation with a capacity of 32 to 90 MVA. Improvements to existing substations would include replacing existing equipment, adding new equipment, and general upgrades to existing substations. The Proposed Program would enhance system reliability, provide redundancy, improve resiliency to extreme climate events, and support state and local mandates for clean energy. Modernization of the distribution system and its infrastructure is essential to meet current needs, address safety concerns, and prepare for future demand.

Surrounding Land Uses and Setting:

The Proposed Program would be located in the LADWP in-basin area, which encompasses the City of Los Angeles. The Proposed Program also includes four areas of consideration for the new proposed distributing substations: the Sun Valley Study Area, Silver Lake Study Area, Southeast Study Area, and Wilmington Study Area. These areas are urban and primarily built out with various uses, including residential, commercial, open space, public facilities, industrial, and other uses.

Potential expansions would be located within existing station footprints or, if needed, adjacent acquired property. Minor improvements at existing substations would be limited to the existing substation property. Other distribution system improvements would be located along existing road rights-of-way, utility easements, or at sites containing existing distribution system infrastructure. The existing substations and location of existing and proposed distribution system infrastructure are in areas that are urban and primarily built out with various uses, including residential, commercial, open space, public facilities, industrial, and other uses.

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.

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

Eduardo Cuevas

Signature

Eduardo Cuevas

Acting Manager of Environmental Planning and Assessment
Los Angeles Department of Water and Power

September 1, 2026

Date

3 ENVIRONMENTAL IMPACT ASSESSMENT

The impact analysis presented below for each threshold is organized by Program component – New Development, Expansions, Minor Improvements, and Other Distribution System Improvements. When the analysis applies to more than one Program component, it is presented together under a combined subheading (e.g., New Development and Expansions). After the analysis for each threshold, a conclusion summarizes the impact determination for each Program component.

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?	☒	☐	☐	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☒	☐	☐	☐
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Discussion

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

New Development

Potentially Significant Impact. Scenic vistas are generally defined as panoramic public views to various natural features, including large water bodies, striking or unusual natural terrain, or unique urban or historic features. Public access to these views may be from park lands, privately- and publicly-owned sites, and public rights-of-way.

Development of new distributing substations would occur within the four identified study areas, including the Sun Valley Study Area, Silver Lake Study Area, Southeast Study Area, and Wilmington Study Area. Public views to natural or unique urban or historic features vary throughout the four study areas. New distributing substations would be approximately 25,000 square feet and up to 25 feet tall. As such, the impact of new development on scenic vistas are considered potentially significant, and this issue will be further analyzed in the PEIR.

Expansions

Potentially Significant Impact. Expansions would involve expanding the footprint of an existing substation. The expansion proposed would depend on the size and configuration of the existing substation and design of the expansion. In some cases, an expansion may require acquisition of one or more adjacent properties. Any expansion that would be limited to the existing substation property would not impact scenic vistas. Any expansion that would require acquisition of property would result in an expanded substation that would be visually similar in character and scale to the existing substation and be located largely within the visual profile of the existing substation. However, an expansion that would require acquisition of property could impact scenic vistas if adjacent acquired properties provide public views to natural or unique urban or historic features. As such, the impact of expansions on scenic vistas is considered potentially significant, and this issue will be further analyzed in the PEIR.

Minor Improvements and Other Distribution System Improvements

No Impact. Minor improvements at existing substations would be limited to the existing substation property and would not change views in the area of the existing substation. Any visual changes associated with minor improvements, such as the potential installation of a perimeter wall for security purposes, would not obstruct scenic vistas. Other distribution system improvements could include, but not be limited to, upgrades to subtransmission lines and feeders, removal of existing pole-top transformer racks, deactivation of existing distributing substations, and other ancillary improvements. Subtransmission lines and feeders would be installed underground and located along existing road rights-of-way and utility easements, and thus, would not impact any scenic vistas once operational. Removal of pole-top transformer racks would remove equipment, and thus, would not obstruct scenic vistas. Deactivation of existing distributing substations and other ancillary improvements would have no potential to impact scenic vistas. Therefore, minor improvements and other distribution system improvements would not have a substantial adverse effect on a scenic vista. No impact would occur, and this issue related to minor improvements and other distribution system improvements will not be further analyzed in the PEIR.

CONCLUSION: Impacts would be potentially significant for new development and expansions. This issue for new development and expansions will be further analyzed in the PEIR. No impact would occur related to minor improvements and other distribution system improvements, and therefore, will not be further analyzed in the PEIR.

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?

Based on a review of the California Department of Transportation (Caltrans) State Scenic Highway map, there is one state-designated scenic highway in the City.² The Topanga Canyon State Scenic Highway (Route State Route 27) overlaps a small portion of the City at the westernmost point in LADWP's West LA service area. There are four eligible scenic highways and one designated federal byway in the City. The City's Mobility Element of the General Plan,

² California Department of Transportation. California State Scenic Highway System Map. Available at: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>, accessed March 23, 2026.

Mobility Plan 2035, also includes a map of locally designated scenic highways.³

New Development

No Impact. Development of new distributing substations would occur within the four identified study areas, including the Sun Valley Study Area, Silver Lake Study Area, Southeast Study Area, and Wilmington Study Area. There are no state-designated scenic highways, eligible scenic highways, or federal byways within or in the vicinity of the study areas for new distributing substations.

For context, the Silver Lake Study Area overlaps a portion of a locally-designated scenic highway, characterized for its views to and from the reservoir and landscaped setbacks, along Silverlake Boulevard from Baxter Street to Duane Street. As discussed in Section 1.5.1, each new distributing substation would be approximately 25,000 square feet, completely enclosed, and a maximum of 25 feet tall. Exterior walls of the stations would be designed to be compatible with the character of surrounding uses and visually shield interior equipment at the street level. Roofs could be included to further shield equipment from view in areas where high visibility into the station from adjacent sensitive uses might occur. If a new distributing substation is developed within the vicinity of the locally-designated scenic highway, its design would be context-sensitive and consider the views to and from the reservoir as well as the landscaped setbacks.

Therefore, new development would not substantially damage scenic resources within a state scenic highway. No impact would occur, and this issue related to new development will not be further analyzed in the PEIR.

Expansions

Less Than Significant Impact. Expansions would involve expanding the footprint of an existing substation. The expansion proposed would depend on the size and configuration of the existing substation and design of the expansion. In some cases, an expansion may require acquisition of one or more adjacent properties. Any expansion that would be limited to the existing substation property would not impact state-designated scenic highways. Any expansion that would require acquisition of property could impact state-designated scenic highways, if adjacent properties are located near and would damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings in the vicinity of scenic highways.

As discussed, there is one state-designated scenic highways in the City. The closest existing substation to the Topanga Canyon State Scenic Highway (State Route 27) is DS-99, located approximately 1.75 miles east of the highway as the crow flies. Due to the intervening distance, there is no potential for an expansion to impact the state-designated scenic highway.

As the activities under the Proposed Program, including expansions, are expected to occur through the planning horizon year 2045, eligible scenic highways may become designated. There are currently four eligible scenic highways in the City, including: the Pacific Coast Highway from the City of Santa Monica to Ventura County in the West LA service area; U.S. 101 from Topanga Canyon Boulevard to the City of Santa Barbara area in West Valley service area; State Route 118 from De Soto Avenue to Moorpark in the West Valley service area;

³ City of Los Angeles, Department of City Planning. *Mobility Plan 2035, An Element of the General Plan*. September 7, 2016.

Interstate 210 from the Interstate 5 interchange to Pasadena in the West Valley and East Valley service areas. Additionally, the Arroyo Seco (State Route 110) is a federal byway from the City of Pasadena to U.S. 101 in the LADWP Metro service area.^{4,5}

The closest existing substation to the eligible scenic portion of the Pacific Coast Highway in the City is DS-29, approximately one mile north of the highway. Due to the intervening distance, there is no potential for an expansion to impact the eligible state-designated scenic highway. The closest existing substation to the eligible scenic portion of U.S. 101 from Topanga Canyon Boulevard to Santa Barbara in the City is DS-129, approximately 0.10 miles north of the highway. While DS-129 is located in close proximity to the eligible scenic portion of this highway, there are existing commercial uses and residences between the substation and the eligible scenic highway. Thus, there is no potential for an expansion to impact the eligible state-designated scenic highway. The closest existing substation to the eligible scenic portion of the State Route 118 in the City is DS-88, approximately 1.15 miles south of the highway. Due to the intervening distance, there is no potential for an expansion to impact the eligible state-designated scenic highway. The closest existing substation to the eligible scenic portion of the State Route 210 in the City is DS-96, approximately 0.35 miles east of the highway. Due to the intervening distance, there is no potential for an expansion to impact the eligible state-designated scenic highway. The closest existing substation to the federal byway in the City is DS-36, adjacent to the highway. However, DS-36 is elevated from the federal byway and potential expansion of this substation would look similar to the existing station as well as other development adjacent to the highway. Additionally, potential expansion of DS-36 would not remove any trees that are on the slope of the highway. Therefore, the potential expansion of DS-36 would not substantially damage scenic resources within a state scenic highway, and impacts would be less than significant.

Therefore, expansions would not substantially damage scenic resources within a state scenic highway. Impacts would be less than significant, and this issue related to expansions will not be further analyzed in the PEIR.

Minor Improvements

Less Than Significant Impact. Minor improvements at existing substations would be limited to the existing substation property, and thus would not impact state-designated scenic highways. As discussed under expansions, DS-36 is adjacent to a federal byway. Minor improvements to DS-36 could include physical protection and security upgrades, such as a perimeter wall. However, DS-36 is elevated from the federal byway and a potential perimeter wall would look similar to the indoor portion of the existing substation as well as other development adjacent to the highway. Therefore, the potential minor improvements associated with DS-36 would not substantially damage scenic resources within a state scenic highway, and impacts would be less than significant. Overall, minor improvements would not substantially damage scenic resources within a state scenic highway. Impacts would be less than significant, and this issue

⁴ California Department of Transportation. California State Scenic Highway System Map. Available at: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>, accessed March 23, 2026.

⁵ According to the U.S Department of Transportation's Federal Highway Administration, to be designated as a National Scenic Byway, a byway must meet the criteria for at least one of six "intrinsic qualities": archeological, cultural, historic, natural, recreational, and scenic. The features contributing to the distinctive characteristics of the corridor's intrinsic quality are recognized throughout the region and are considered regionally significant. Source: U.S Department of Transportation. National Scenic Byways & All-American Roads. Available at: <https://fhwaapps.fhwa.dot.gov/bywaysp>, accessed April 23, 2026.

related to minor improvements will not be further analyzed in the PEIR.

Other Distribution System Improvements

Potentially Significant Impact. Other distribution system improvements could include, but not be limited to, upgrades to subtransmission lines and feeders, removal of existing pole-top transformer racks, deactivation of existing distributing substations, and other ancillary improvements. Installation of new or expanded subtransmission lines and feeders that would be installed underground along existing road rights-of-way would not alter or damage any scenic resources as none exist within the roadway. Moreover, installation of new or expanded subtransmission lines and feeders would not change the designation of the scenic roadway or alter the view of or from the scenic highway. Removal of pole-top transformer rack equipment and deactivation of existing distributing substations would occur at sites containing existing distribution system infrastructure. While these activities may occur adjacent to the designated state scenic highway in the City, eligible state scenic highways, federal byway, or locally-designated highways, these activities would be limited in scope (i.e., removal of equipment) and would not damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings. However, construction of new or expanded subtransmission lines and feeders could be installed along existing utility easements in undeveloped areas adjacent to the designated state scenic highway in the City, eligible state scenic highways, federal byway, or locally-designated highways. These improvements could damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings. This impact is considered potentially significant and this issue related to other distribution system improvements will be further analyzed in the PEIR.

CONCLUSION: Impacts would be potentially significant for other distribution system improvements. This issue for other distribution system improvements will be further analyzed in the PEIR. No impact would occur related to new development, and therefore, will not be further analyzed in the PEIR. Less than significant impacts would occur related to expansions and minor improvements, and therefore, will not be further analyzed in the PEIR.

- 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?**

As defined by the California Code of Regulations, Title 14, Section 15387, an "urbanized area" refers to a central city or a group of contiguous cities with a population of 50,000 or more, together with adjacent densely populated areas having a population density of at least 1,000 persons per square mile. Therefore, the City of Los Angeles qualifies as an urbanized area, and impacts would be potentially significant if the Proposed Program would conflict with applicable zoning and other regulations governing scenic quality.

The City's Zoning Code identifies permitted uses and provides specific development standards at the parcel level. The City is in the process of rezoning and, until the new zoning code is implemented across the City, two zoning codes are in effect, including the original Zoning Code contained in Chapter 1 of the Los Angeles Municipal Code (LAMC) and the new Zoning Code contained in Chapter 1A of the LAMC. Both the original Zoning Code and the new Zoning Code exempt the construction, installation, operation, and maintenance of certain public utilities,

including electric power transmission and distribution lines, from zoning requirements and limitations.⁶ The new Zoning Code is currently only in effect within the Downtown Community Plan Area but will become effective as other Community Plans are updated.

Under the original Zoning Code, installation of public utilities infrastructure is generally allowed in any zone throughout the City, although a Conditional Use or similar quasi-jurisdictional permit may be required.⁷ Performance standards for public utilities are outlined in LAMC Section 14.00.A.6(a) and are intended to provide for landscaping, open space, scale, bulk, height, yards and setbacks that are similar to those in the adjacent properties in the neighborhood.⁸ For public utilities projects in the listed zones that cannot meet the listed performance standards, a Conditional Use Permit would be required.⁹ Under the new Zoning Code, minor utilities uses, are permitted with screening standards in all use districts, which would require walls of certain heights and landscaping^{10, 11, 12, 13} For additional details on the Proposed Program's consistency with zoning, refer to Section 3.11, Land Use and Planning.

New Development

Less Than Significant Impact. Development of new distributing substations within the four identified study areas would occur within existing developed portions of the City. Existing substations throughout the City are on parcels designated and zoned for varying uses. As previously discussed, installation of public utilities infrastructure is generally allowed throughout the City but may require a Conditional Use Permit. Development of new distributing substations would occur within the four identified study areas, including the Sun Valley Study Area, Silver Lake Study Area, Southeast Study Area, and Wilmington Study Area.

The proposed new distributing substation in the Sun Valley Study Area would primarily be located within the Sun Valley - La Tuna Canyon Community Plan area and partially within the Arleta-Pacoima Community Plan area. The parcels within the Sun Valley Study Area in the Sun Valley - La Tuna Canyon Community Plan area are not located in the Stonehurst HPOZ, Sun Valley Community Design Overlay, Sun Valley Streetscape Plan, or San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan. There are no specific zoning regulations that govern scenic quality for public utilities in the Sun Valley - La Tuna Canyon Community Plan. The parcels within the Sun Valley Study Area in the Arleta-Pacoima Community Plan area are not located in Pacoima Community Design Overlay. The public right-of-way on San Fernando Road northwest of Brandford Street are located within the Pacoima Streetscape Plan; however, a new distributing substation would not be located in the public right-of-way, and thus, the standards established in the plan do not apply to the Proposed Program.

The proposed new distributing substation in the Silver Lake Study Area would be primarily located within the Silver Lake–Echo Park–Elysian Valley Community Plan area and partially within portions of the Hollywood Community Plan area, the Wilshire Community Plan area, and the Westlake Community Plan area. Within the Silver Lake–Echo Park–Elysian Valley

⁶ Los Angeles Municipal Code Section 12.22.A.1 and Section 5D.3.11.

⁷ Los Angeles Department of City Planning, Office of Zoning Administration, Case No. ZA-2022-7106-ZAI, Zoning Administrator's Interpretation, Lists of Uses Permitted in Various Zones, Citywide, December 20, 2022.

⁸ Los Angeles Municipal Code Section 14.00.A.6(b).

⁹ Los Angeles Municipal Code Section 14.00.B.1.

¹⁰ Los Angeles Municipal Code Article 5. Use, Part 5B. Use Districts.

¹¹ Los Angeles Municipal Code Article 5. Use, Part 5B. Use Districts.

¹² Los Angeles Municipal Code Section 4C.8.1.2.c.

¹³ Los Angeles Municipal Code Section 4C.8.2.3.a.

Community Plan area, parcels within the southeast portion of the Silver Lake Study Area are located in the Echo Park Community Design Overlay. As outlined in the Echo Park Community Design Overlay Guidelines, buildings fronting the Echo Park Lake should not detract from the area's character and scenic resources and should comply to specific design standards. Within the Silver Lake–Echo Park–Elysian Valley Community Plan area, Hollywood Community Plan area, and the Wilshire Community area, parcels within the western portion of the Silver Lake Study Area are located in the Vermont–Western Transit Oriented District Station Neighborhood Area Plan Specific Plan. As outlined in this specific plan, when new utility service is installed in conjunction with new development or extensive remodeling, all proposed utilities on the project site shall be placed underground. If underground service is not currently available, then provisions shall be made for future underground service. Parcels within the Silver Lake Study Area are not located in the following Silver Lake–Echo Park–Elysian Valley Community Plan Community Plan Overlays: Angelino Heights HPOZ; Central City West Specific Plan; Chinatown Redevelopment Plan; and Cornfield Arroyo Seco Specific Plan. In addition, parcels within the Silver Lake Study Area are not located in the following Hollywood Community Plan Overlays: Hollywood CPIO; Hancock Park HPOZ; Hillside Construction Regulation Supplemental Use District; Hollywood Redevelopment Plan; Hollywood Grove HPOZ ; Hollywood Signage Sign District; Hollywoodland Specific Plan; Mulholland Scenic Parkway Specific Plan; Paramount Pictures Specific Plan; Spaulding Square HPOZ; Sunset Square HPOZ; and Whitley Heights HPOZ. Furthermore, parcels within the Silver Lake Study Area are not located in the following Wilshire Community Plan Overlays: Academy of Motion Picture Arts and Sciences Museum Sign District; Carthay Circle HPOZ; Carthay Square HPOZ; Country Club Park HPOZ; Hancock Park HPOZ; Mid City Corridors Redevelopment Plan; Miracle Mile Community Design Overlay; Miracle Mile HPOZ; Miracle Mile North HPOZ; Oxford Square HPOZ; Paramount Pictures Specific Plan; Park Mile Specific Plan; South Carthay HPOZ; Westlake Redevelopment Plan; Wilshire Park HPOZ; Wilshire/Koreatown Redevelopment Plan; Windsor Square HPOZ; and Windsor Village HPOZ. Lastly, the parcels within the Silver Lake Study Area in the Westlake Community Plan area are not located in the Central City West Specific Plan, Pico-Union HPOZ, or Westlake Redevelopment Plan. There are no specific zoning regulations that govern scenic quality for public utilities in the Westlake Community Plan.

The proposed new distributing substation in the Southeast Study Area would be located within the Southeast Los Angeles Community Plan area. The parcels in the Southeast Los Angeles Community Plan area are located within the 52nd Place Historic Preservation Overlay Zone (HPOZ), which is an overlay meant to preserve the historic streetscape of the zone. Any changes within an HPOZ are governed by the HPOZ Board, who serve as an advisory body to the Department of City Planning related to new construction, large additions, and major alterations or rehabilitation projects. Parcels in the Southeast Los Angeles Community Plan area are also located within the Southeast Los Angeles Community Plan Implementation Overlay (CPIO), the purpose of which is to ensure preserve neighborhood identity. Projects within the CPIO would be required to comply with the development standards of the subarea; if a project cannot comply, it would be required to obtain a CPIO Adjustment or Exception, which would be required to approved by the Planning Commission. With approval of the Adjustment or Exception, if required, to allow the proposed new distributing substation, development of the new station would not conflict with the applicable zoning and other regulations governing scenic quality at the time of project implementation. Lastly, parcels in the Southeast Los Angeles Community Plan area are located within the Council District 9 Corridors Redevelopment Plan. As stated in the plan, public utilities are authorized to be installed and constructed as necessary to carry out the plan. Thus, there are no specific zoning regulations that govern scenic quality for public utilities in the Council District 9 Corridors Redevelopment Plan. The parcels in the Southeast Los Angeles Community Plan area are not located in the Broadway/Manchester

Redevelopment Plan, Jordan Downs Urban Village Specific Plan, Watts Corridor Redevelopment Plan, USC Specific Plan, or The Reef Transit Oriented Sign District.

The proposed new distributing substation in the Wilmington Study Area would be located within the Wilmington-Harbor City Community Plan area. The parcels within the Wilmington Study Area are not located in the Ponte Vista at San Pedro Specific Plan or Banning Park HPOZ. There are no specific zoning regulations that govern scenic quality for public utilities in the Wilmington-Harbor City Community Plan.

Furthermore, none of the four study areas are located within the boundaries of the Downtown Community Plan Area. As such, the study areas are currently subject to the requirements and development standards under the original Zoning Code. If the community plans for the areas containing the four study areas are updated prior to development of the new distributing substations and the new Zoning Code would be in effect in these areas, the new distributing substations would be permitted in any use district and would be required to be designed to comply with screening standards outlined in LAMC Section 4.C.8.

Once the specific locations are identified for each proposed new distributing substation, existing land use and zoning requirements for the selected parcel(s) would be reviewed to determine whether a Conditional Use Permit would be needed. If required, the Conditional Use Permit process would entail a review of the proposed new distributing substation to ensure compatibility with surrounding land uses. With approval of a Conditional Use Permit, if required, to allow the proposed new distributing substations, development of the new stations would not conflict with the applicable zoning and other regulations governing scenic quality at the time of project implementation. The impact would be less than significant, and this issue related to new development will not be further analyzed in the PEIR.

Expansions

Less Than Significant Impact. Expansions would involve expanding the footprint of an existing substation. The expansion proposed would depend on the size and configuration of the existing substation and design of the expansion. In some cases, an expansion may require acquisition of one or more adjacent properties. Similar to the new distributing substations, expansions into parcels outside of the existing substation property may require a Conditional Use Permit to allow for the proposed expansion on a specific parcel. If an expansion into a parcel outside of an existing substation property is identified, existing land use and zoning requirements for the selected parcel(s) would be reviewed to determine whether a Conditional Use Permit would be needed. If required, the Conditional Use Permit process would entail a review of the proposed expansion to ensure compatibility with surrounding land uses. With approval of a Conditional Use Permit, if required, expansions would not conflict with the applicable zoning and other regulations governing scenic quality at the time of project implementation. The impact would be less than significant and this issue related to expansions will not be further analyzed in the PEIR.

Minor Improvements

No Impact. Minor improvements at existing substations would be limited to the existing station property and would be consistent with the land uses at existing stations. No changes to existing land use or zoning designations would be required to implement the proposed minor improvements. Minor improvements could include substation physical protection and security upgrades, such as the construction of perimeter walls. Perimeter walls would be designed to be

compatible with the character of surrounding uses, and as such, would not conflict with applicable zoning and other regulations governing scenic quality. Therefore, minor improvements would not conflict with applicable zoning and other regulations governing scenic quality. No impact would occur, and this issue related to minor improvements will not be further analyzed in the PEIR.

Other Distribution System Improvements

No Impact. Other distribution system improvements could include, but not be limited to, upgrades to subtransmission lines and feeders, removal of existing pole-top transformer racks, deactivation of existing distributing substations, and other ancillary improvements. Subtransmission lines and feeders would be installed underground and located along existing road rights-of-way, and thus, do not have zoning designations and would not conflict with applicable zoning and other regulations governing scenic quality. Subtransmission lines and feeders could also be installed within existing utility easements, which would not conflict with scenic quality as the lines would be installed underground. No changes to existing land use or zoning designations would be required for removal of pole-top transformer racks, deactivation of existing distributing substations, and other ancillary improvements. Therefore, other distribution system improvements would not conflict with applicable zoning and other regulations governing scenic quality. No impact would occur, and this issue related to minor improvements will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development and expansions. No impact would occur related to minor improvements and other distribution system improvements. This issue will not be further analyzed in the PEIR.

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?

New Development

Less Than Significant Impact. Development of new distributing substations would occur within the four identified study areas, including the Sun Valley Study Area, Silver Lake Study Area, Southeast Study Area, and Wilmington Study Area. These areas are urban and primarily built out with various uses, including residential, commercial, open space, public facilities, industrial, and other uses. New distributing substations would have an open-air design and only include a roof in areas where high visibility into the station from adjacent sensitive uses might occur. New stations may include lighting for security purposes, including pole-mounted light emitting diode (LED) lights and exterior wall-mounted lights, which could introduce new sources of light to the specific project site. However, the lights would consist of full cutoff fixtures that direct light downward and outward to prevent spill-over light and reduce glare. Additionally, new distributing substations and their associated equipment would be enclosed with exterior walls that would be designed to be compatible with the character of surrounding uses. As lighting for new distributing substations would be minimal, and the equipment would be enclosed by walls that would be similar to the surrounding uses, new distributing substations would not create a new source of substantial light or glare. Impacts would be less than significant, and this issue related to new development will not be further analyzed in the PEIR.

Expansions

Less Than Significant Impact. Expansions would involve expanding the footprint of an existing substation. The expansion proposed would depend on the size and configuration of the existing substation and design of the expansion. In some cases, an expansion may require acquisition of one or more adjacent properties. Any expansion that would be limited to the existing substation property would not create new sources of substantial light and glare to an area as the type of lighting and the materials used to construct the enclosure around the expanded portion of the station would be similar to the existing station. Any expansion that would require acquisition of property may result in a change in lighting and glare, depending on the use of the property that is acquired. LADWP would design the expanded portion of the substation to either generate a similar amount of glare as the existing substation enclosure through the use of similar materials, or in some cases, a less amount of glare through the use of less reflective materials. Similarly, lighting for expansions would produce either similar or less spillover lighting as the existing substation. Therefore, expansions would not create a new source of substantial light or glare. Impacts would be less than significant, and this issue related to expansions will not be further analyzed in the PEIR.

Minor Improvements

Less Than Significant Impact. Minor improvements at existing substations would be limited to the existing station property. Minor improvements could include substation physical protection and security upgrades, such as the construction of perimeter walls, that may include lighting for security purposes, including pole-mounted LED lights and exterior wall-mounted lights, which could introduce new sources of light to the existing substation. However, the lights would consist of full cutoff fixtures that direct light downward and outward to prevent spill-over light and reduce glare. Additionally, minor improvements that include perimeter walls would be designed to be compatible with the character of surrounding uses. As lighting for minor improvements would be minimal, and existing stations would be enclosed by walls that would be similar to the surrounding uses, minor improvements would not create a new source of substantial light or glare. Additionally, other activities associated with minor improvements would not create new sources of light or glare. Impacts would be less than significant, and this issue related to minor improvements will not be further analyzed in the PEIR.

Other Distribution System Improvements

No Impact. Other distribution system improvements could include, but not be limited to, upgrades to subtransmission lines and feeders, removal of existing pole-top transformer racks, deactivation of existing distributing substations, and other ancillary improvements. These activities would not include lighting or require the use of any reflective materials. Thus, other distribution system improvements would not create a new source of light or glare. No impact would occur, and this issue related to other distribution system improvements will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development, expansions, and minor improvements. No impact would occur related to other distribution system improvements. This issue will not be further analyzed in the PEIR.

3.2 Agriculture and Forestry Resources

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

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?**

New Development

No Impact. Development of new distributing substations would occur within the four identified study areas, including the Sun Valley Study Area, Silver Lake Study Area, Southeast Study Area, and Wilmington Study Area. According to the California Important Farmland Finder maintained by the California Department of Conservation, the parcels comprising the Silver Lake Study Area and the Southeast Study Area are designated as Urban and Built-Up and

Other Land.¹⁴ Therefore, new development in these two study areas would not convert Farmland to a non-agricultural use. Both the Sun Valley and Wilmington Study Areas contain parcels identified as Unique Farmland.¹⁵ Unique Farmland in the Sun Valley Study Area intersects with an existing LADWP transmission right-of-way, east of the intersection of San Fernando Road and Sheldon Street. Unique Farmland in the Wilmington Study Area is located at the eastern boundary of the study area, north of the intersection of S Wilmington Avenue and E Lomita Boulevard. However, LADWP would not construct a new distributing substation in any parcels identified as Unique Farmland. Therefore, new development would not convert Farmland to a non-agricultural use. No impact would occur, and this issue related to new development will not be further analyzed in the PEIR.

Expansions

No Impact. Expansions would involve expanding the footprint of an existing substation. The expansion proposed would depend on the size and configuration of the existing substation and design of the expansion. In some cases, an expansion may require acquisition of one or more adjacent properties. Any expansion that would be limited to the existing substation property would be consistent with the land uses at existing stations, none of which contain designated farmland. According to the California Important Farmland Finder maintained by the California Department of Conservation, none of the existing substation properties or adjacent parcels contain designated Farmland.¹⁶ Therefore, expansions, including expansions that may require acquisition of property, would not convert Farmland to non-agricultural use. No impact would occur, and this issue related to expansions will not be further analyzed in the PEIR.

Minor Improvements

No Impact. Minor improvements at existing substations would be limited to the existing station property and would be consistent with the land uses at existing stations. As discussed previously, none of the existing substation properties contain designated Farmland. Additionally, no changes to existing land uses would be required to implement the proposed minor improvements. Therefore, minor improvements would not convert Farmland to non-agricultural use. No impact would occur, and this issue related to minor improvements will not be further analyzed in the PEIR.

Other Distribution System Improvements

No Impact. Other distribution system improvements could include, but not be limited to, upgrades to subtransmission lines and feeders, removal of existing pole-top transformer racks, deactivation of existing distributing substations, and other ancillary improvements. New or expanded subtransmission lines and feeders would be installed underground along existing road rights-of-way or utility easements. Additionally, removal of pole-top transformer rack equipment and deactivation of existing distributing substations would occur at sites containing existing distribution system infrastructure. As such, no changes to existing land uses would be required to implement the other distribution system improvements. Therefore, other distribution

¹⁴ California Department of Conservation. California Important Farmland Finder. Available at: <https://maps.conservation.ca.gov/dlrp/ciff/>, accessed January 5, 2026.

¹⁵ California Department of Conservation. California Important Farmland Finder. Available at: <https://maps.conservation.ca.gov/dlrp/ciff/>, accessed January 5, 2026.

¹⁶ California Department of Conservation. California Important Farmland Finder. Available at: <https://maps.conservation.ca.gov/dlrp/ciff/>, accessed January 5, 2026.

system improvements would not convert Farmland to non-agricultural use. No impact would occur, and this issue related to other distribution system improvements will not be further analyzed in the PEIR.

CONCLUSION: No impact would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

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

The City is in the process of rezoning and, until the new zoning code is implemented across the City, two zoning codes are in effect, including the original Zoning Code contained in Chapter 1 of the LAMC and the new Zoning Code contained in Chapter 1A of the LAMC. Both the original Zoning Code and the new Zoning Code exempt the construction, installation, operation, and maintenance of certain public utilities, including electric power transmission and distribution lines, from zoning requirements and limitations.¹⁷ The new Zoning Code is currently only in effect within the Downtown Community Plan Area but will become effective as other Community Plans are updated.

Under the original Zoning Code, agricultural zones include the A1, A2, and RA Zones. Public utilities uses are permitted as a public benefit in each of these zones pursuant to the performance standards outlined in LAMC Section 14.00.A.6(a).¹⁸ Performance standards for public utilities in these zones are intended to provide for landscaping, open space, scale, bulk, height, yards and setbacks that are similar to those in the adjacent properties in the neighborhood.¹⁹ If the performance standards cannot be met, a Conditional Use Permit would be required.²⁰ Under the new Zoning Code, Section 5B.2.1. Agricultural 1 (A1) permits minor utilities uses, which are defined as infrastructure that does not require significant health, safety, and environmental precautions, and does not require on-site personnel including electrical substations with screening standards, in Agricultural Use Districts.²¹

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. No portion of Los Angeles County, including all parcels within the City of Los Angeles boundary, is under a Williamson Act contract.²²

New Development and Expansions

Less Than Significant Impact. Development of new distributing substations would occur within the four identified study areas, including the Sun Valley Study Area, Silver Lake Study Area, Southeast Study Area, and Wilmington Study Area. Expansions would involve expanding the footprint of an existing substation and may require acquisition of one or more adjacent properties. Both new development and expansions could occur within parcels zoned for

¹⁷ Los Angeles Municipal Code Section 12.22.A.1 and Section 5D.3.11.

¹⁸ Los Angeles Department of City Planning, Office of Zoning Administration. Case No. ZA-2022-7106-ZAI, Zoning Administrator's Interpretation, Lists of Uses Permitted in Various Zones, Citywide. December 20, 2022.

¹⁹ Los Angeles Municipal Code Section 14.00.A.6(b).

²⁰ Los Angeles Municipal Code Section 14.00.B.1.

²¹ Los Angeles Municipal Code Section 5B.2.1.

²² California Department of Conservation. California Williamson Act Enrollment Finder. Available at: <https://maps.conservation.ca.gov/dlrp/WilliamsonAct/>, accessed December 18, 2025.

agricultural use. As discussed previously, public utilities uses, including electrical substations, are permitted within agricultural zones under both the original Zoning Code and the new Zoning Code. None of the four study areas for new development are located within the boundaries of the Downtown Community Plan Area. As such, the study areas are currently subject to the requirements and development standards under the original Zoning Code. If the design of the new distributing substation or expansion outside of the Downtown Community Plan Area does not meet the performance standards listed in LAMC Section 14.00.A.6(a), a Conditional Use Permit would be required.

As the activities under the Proposed Program, including new development and expansions, are expected to occur through the planning horizon year 2045, community plans for the areas may be updated prior to implementation of specific projects, and thus, the new Zoning Code would be in effect. Under the new Zoning Code, the new distributing substations and expansions would be permitted in Agricultural Use Districts and would be required to be designed to comply with the F-Screen 3 frontage screening standards and the T-Screen 1 transitional screening standards outlined in LAMC Section 4.C.8. The F-Screen 3 standards require walls at least 3.5 feet in height and a planting area at least 3 feet wide with a minimum of 20 screening plants and 3 large species trees for every 50 feet of length.²³ The T-Screen 1 transitional screening standards require walls at least 6 feet in height and a planting area at least 5 feet wide with a minimum of 3 large species trees for every 50 feet in length.²⁴

Once the specific locations are identified for each proposed new distributing substation and expansions occurring outside of an existing substation property, existing land use and zoning requirements for the selected parcel(s) would be reviewed to determine whether a Conditional Use Permit would be needed. If required, the Conditional Use Permit process would entail a review of the proposed new distributing substation or expansion to ensure compatibility with surrounding land uses. With approval of a Conditional Use Permit, if required, new development and expansions would not conflict with existing zoning for agricultural use. The impact would be less than significant, and this issue related to new development and expansions will not be further analyzed in the PEIR.

As previously discussed, no portion of Los Angeles County, including all parcels within the City of Los Angeles boundary, is under a Williamson Act contract.²⁵ Therefore, new development and expansions would not conflict with a Williamson Act contract, and no impact would occur. This issue will not be further analyzed in the PEIR.

Minor Improvements and Other Distribution System Improvements

No Impact. Minor improvements at existing substations would be limited to the existing station property and would be consistent with the land uses at existing stations. Other distribution system improvements could include installation of subtransmission lines and feeders underground along existing road rights-of-way or utility easements, while removal of existing pole-top transformer racks, deactivation of existing distributing substations, and other ancillary improvements would occur at sites containing existing distribution system infrastructure. No changes to existing land use or zoning designations would be required to implement minor improvements or other distribution system improvements. Additionally, as discussed, electric

²³ Los Angeles Municipal Code Section 4C.8.1.2.c.

²⁴ Los Angeles Municipal Code Section 4C.8.2.3.a.

²⁵ California Department of Conservation. California Williamson Act Enrollment Finder. Available at: <https://maps.conservation.ca.gov/dlrp/WilliamsonAct/>, accessed December 18, 2025.

power transmission and distribution lines are exempt from zoning requirements and limitations under both the original Zoning Code and the new Zoning Code. Therefore, no impact to existing zoning for agricultural use would occur. This issue related to minor improvements and other distribution system improvements will not be further analyzed in the PEIR.

As discussed, no portion of Los Angeles County, including all parcels within the City of Los Angeles boundary, is under a Williamson Act contract.²⁶ Therefore, minor improvements and other distribution system improvements would not conflict with a Williamson Act contract, and no impact would occur. This issue will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development and expansions. No impact would occur related to minor improvements and other distribution system improvements. This issue will not be further analyzed in the PEIR.

- 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))?**

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

No Impact. None of the four Study Areas for the development of new distributing substations, existing substation properties, or parcels adjacent to existing substation properties contain lands that are zoned or used for forest land or timberland as defined in Public Resources Code Section 12220(g) and Government Code Section 4526.²⁷ Additionally, other distribution system improvements would occur along existing road rights-of-way, utility easements, or at sites containing existing distribution system infrastructure. No changes to existing land use or zoning designations would be required to implement minor improvements or other distribution system improvements. Therefore, the Proposed Program would not conflict with existing zoning for or cause a rezoning of forest or timberland, and no impact would occur. This issue will not be further analyzed in the PEIR.

CONCLUSION: No impact would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

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

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

No Impact. None of the four Study Areas for the development of new distributing substations, existing substation properties, or parcels adjacent to existing substation properties contain lands

²⁶ California Department of Conservation. California Williamson Act Enrollment Finder. Available at: <https://maps.conservation.ca.gov/dlrp/WilliamsonAct/>, accessed December 18, 2025.

²⁷ City of Los Angeles. Zoning Information and Map Access System (ZIMAS). Available at: <http://zimas.lacity.org/>, accessed December 18, 2025.

that are used for forest land.²⁸ Additionally, other distribution system improvements would occur along existing road rights-of-way, utility easements, or at sites containing existing distribution system infrastructure, and thus, no forest land exist in these areas. Therefore, the Proposed Program would not result in the loss of forest land or conversion of forest land to non-forest use, and no impact would occur. This issue will not be further analyzed in the PEIR.

CONCLUSION: No impact would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

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?

New Development

No Impact. As discussed in the response to Section 3.2(d), all four Study Areas for the development of new distributing substations are developed with urban land uses and do not contain forest land.²⁹ Additionally, as previously discussed in the response to Section 3.2(a), the Silver Lake Study Area and the Southeast Study Area do not contain Farmland.³⁰ Therefore, new development in these two study areas would not convert Farmland to a non-agricultural use. However, both the Sun Valley and Wilmington Study Areas contain parcels identified as Unique Farmland.³¹ Nevertheless, LADWP would not construct a new distributing substation in any parcels identified as Unique Farmland. Therefore, new development would not convert Farmland to non-agricultural use or forest land to non-forest use, and no impact would occur. This issue related to new development will not be further analyzed in the PEIR.

Expansions

No Impact. Expansions would involve expanding the footprint of an existing substation and may require acquisition of one or more adjacent properties. As discussed in the responses to Section 3.2(a) and 3.2(d), none of the existing substation properties or adjacent parcels contain Farmland or forest land. Therefore, expansions would not convert Farmland to non-agricultural use or forest land to non-forest use, and no impact would occur. This issue related to expansions will not be further analyzed in the PEIR.

Minor Improvements

No Impact. Minor improvements at existing substations would be limited to the existing station property and would not extend into adjacent properties. As discussed in the responses to Section 3.2(a) and 3.2(d), existing substations do not contain Farmland or forest land. Therefore, minor improvements would not convert farmland to non-agricultural use or forest land

²⁸ City of Los Angeles. Zoning Information and Map Access System (ZIMAS). Available at: <http://zimas.lacity.org/>, accessed December 18, 2025.

²⁹ City of Los Angeles. Zoning Information and Map Access System (ZIMAS). Available at: <http://zimas.lacity.org/>, accessed December 18, 2025.

³⁰ California Department of Conservation. California Important Farmland Finder. Available at: <https://maps.conservation.ca.gov/dlrp/ciff/>, accessed January 5, 2026.

³¹ California Department of Conservation. California Important Farmland Finder. Available at: <https://maps.conservation.ca.gov/dlrp/ciff/>, accessed January 5, 2026.

to non-forest use, and no impact would occur. This issue related to minor improvements at existing substations will not be further analyzed in the PEIR.

Other Distribution System Improvements

No Impact. Other distribution system improvements would occur within existing road rights-of-way, utility easements, and at sites containing existing distribution system infrastructure. As previously discussed, no changes to existing land uses would be required to implement the other distribution system improvements. Therefore, other distribution system improvements would not convert Farmland to non-agricultural use or forest land to non-forest use, and no impact would occur. This issue related to other distribution system improvements will not be further analyzed in the PEIR.

CONCLUSION: No impact would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

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

Discussion

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

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Potentially 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. SCAQMD's Air Quality Management Plan (AQMP) is the regional plan for achieving air quality standards and healthful air within the SCAQMD jurisdictional boundaries. The City, including the LADWP in-basin service area and setting for the Proposed Program, is located within the South Coast Air Basin, which is a defined geographic sub-region within the SCAQMD's jurisdiction. Construction and operation of the Proposed Program would generate air pollutant emissions, which would be subject to the criteria of the SCAQMD AQMP and require evaluation. The impact is considered potentially significant, and this issue will be further analyzed in the PEIR.

CONCLUSION: Impacts would be potentially significant for the Proposed Program. This issue will be further analyzed in the PEIR.

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?

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Potentially Significant Impact. As described above, the City, including the LADWP in-basin service area and setting of the Proposed Program, is located within the South Coast Air Basin.

The basin has a history of recorded air quality violations and is an area where both state and federal ambient air quality standards are currently exceeded. The South Coast Air Basin is designated as a nonattainment area for the federal standards for ozone (O₃) and fine particulate matter 2.5 microns or less in diameter (PM_{2.5}), and a nonattainment area for the state standards for O₃, inhalable particulate matter 10 microns or less in diameter (PM₁₀), and PM_{2.5}.³² 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.³³ According to this guidance, if construction or operation of a project would produce maximum daily emissions exceeding the applicable project-specific thresholds, those emissions would also be considered cumulatively significant. For this reason, the SCAQMD applies the same project-level thresholds to cumulative assessments. Conversely, if construction or operation of a specific 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.

Construction of each component under the Proposed Program would generate short-term criteria air pollutants related primarily to the use of construction equipment and vehicle trips. Operational activities associated with the Proposed Program would consist of inspection and maintenance activities, which are anticipated to generate minimal vehicle trips and negligible associated emissions. Based on the potential construction emissions, the overall impacts of the Proposed Program are considered potentially significant, and this issue will be further analyzed in the PEIR.

CONCLUSION: Impacts would be potentially significant for the Proposed Program. This issue will be further analyzed in the PEIR.

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

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Potentially Significant Impact. 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 SCAQMD recommends that air quality assessments consider the potential localized impacts to sensitive receptors at distances up to 500 meters (1,640 feet) from the project site, depending on the proximity of sensitive land uses. The greatest potential for toxic air contaminants affecting sensitive receptors during construction of each component under the Proposed Program would be from diesel particulate emissions associated with heavy equipment usage. Operational activities associated with the Proposed Program would consist of inspection and maintenance activities, which are anticipated to generate minimal vehicle trips and negligible associated emissions. Based on the potential construction emissions, the overall impacts of the Proposed Program are considered potentially significant, and this issue will be further analyzed in the PEIR.

CONCLUSION: Impacts would be potentially significant for the Proposed Program. This issue

³² South Coast Air Quality Management District. *2022 Air Quality Management Plan, Tables 2-3 and 2-5*. December 2, 2022.

³³ South Coast Air Quality Management District. *White Paper on Potential Control Strategies to Address Cumulative Impacts From Air Pollution*. August 2003.

will be further analyzed in the PEIR.

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

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Potentially Significant Impact. 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, or visible dust plumes. Potential sources that may produce objectionable odors during construction include equipment exhaust and the application of asphalt and architectural coatings. Although odors related to construction would be temporary, they may be detected on properties surrounding specific project sites. Thus, the impact is considered potentially significant, and this issue will be further analyzed in the PEIR.

CONCLUSION: Impacts would be potentially significant for the Proposed Program. This issue will be further analyzed in the PEIR.

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?	☒	☐	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☒	☐	☐	☐
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☒	☐	☐	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☒	☐	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Discussion

- 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?**

New Development and Expansions

Potentially Significant Impact. A significant impact could occur if the projects implemented under the Proposed Program 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 or U.S. Fish and Wildlife Service. Development of new distributing substations would occur within the four identified study areas, including the Sun Valley Study Area, Silver Lake Study Area, Southeast Study Area, and Wilmington Study Area. Expansions

would involve expanding the footprint of an existing substation and may require acquisition of one or more adjacent properties. While LADWP's in-basin service area comprises land that has been predominantly built out and highly disturbed, both new development and expansions could occur within areas that have habitat for, or may otherwise affect, special-status species. The impact is potentially significant, and this issue will be further analyzed in the PEIR.

Minor Improvements

Less Than Significant Impact. Minor improvements at existing substations would be limited to the existing station property. The areas within existing substations are developed and disturbed, and thus, would not remove or modify habitat for any candidate, sensitive, or special status species. However, there may be trees within or adjacent to existing substation properties, in which construction activities for minor improvements, such as construction of perimeter walls or fencing, may disturb birds. Nesting birds are protected pursuant to the federal Migratory Bird Treaty Act of 1918 and the California Fish and Game Code. To maintain compliance with the Migratory Bird Treaty Act and the California Fish and Game Code, clearance surveys are typically required prior to any ground disturbance or vegetation removal activities to avoid direct or indirect impacts to active bird nests and/or nesting birds. Direct impacts to nesting birds could occur if trees are removed. Indirect impacts to nesting birds within the survey area could occur as a result of noise, increased human presence, and vibrations resulting from construction activities. Disturbances related to construction could result in increased nestling mortality due to nest abandonment or decreased feeding frequency. LADWP's standard construction procedures include the following Best Management Practice (BMP)-1, which would be implemented during project construction that have the potential to remove trees or vegetation. Implementation of BMP-1 would minimize indirect impacts to nesting birds. Therefore, impacts to candidate, sensitive, or special status species would be less than significant.

BMP-1: Nesting Bird Surveys

If project activities associated with minor improvements that could result in the removal of trees or vegetation are conducted during nesting bird season, a pre-construction nesting bird survey shall be conducted by a qualified biologist within 72 hours prior to the start of project construction activities to determine whether active nests are present within or directly adjacent to construction zones. Following completion of the survey, a brief memo report shall be prepared to document the location of any nests found, their status (i.e., eggs or hatchlings present), the species of bird, and existing biological conditions of the project area. If an active nest is found, the following shall be implemented to avoid and minimize impacts to the nest.

- a. A qualified biologist shall determine if a nest avoidance buffer zone is necessary to restrict construction activities in proximity to the nest to protect the nest from failing. In determining the need for and establishing the size of any buffer zone, the qualified biologist shall take into account existing baseline conditions (e.g., topography, buffering buildings or other structures, etc.). In addition, observed avian response to disturbances related to existing station operations (e.g., noise and human activity) shall factor into the requirement for and size of a nest avoidance buffer.
- b. Any avoidance buffers required around active nests shall be delineated on site with bright flagging or other means, for easy identification by project personnel. The resident engineer and construction supervisor will be notified of the nest and the buffer limits to ensure it is maintained.

- c. The qualified biologist shall monitor all detected 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 placing visual screens or sound dampening structures between the nest and construction activity or establishing or increasing buffer distances. The qualified biologist shall monitor each active nest until they determine that nestlings have fledged and dispersed, or the nest is no longer active. Until such a determination is made, construction-related activities that, in the opinion of the qualified biologist, might disturb nesting activities shall be prohibited within nest buffer zones.

Other Distribution System Improvements

Potentially Significant Impact. Other distribution system improvements could include installation of subtransmission lines and feeders underground along existing road rights-of-way or easements, removal of existing pole-top transformer racks, deactivation of existing distributing substations, and other ancillary improvements at sites containing existing distribution system infrastructure. The areas along existing road rights-of-way and at sites containing existing infrastructure are developed and disturbed. However, there may be trees within or adjacent to existing substation properties or along road rights-of-way, in which construction activities for minor improvements and other distribution system improvements may disturb birds. Additionally, installation of subtransmission lines and feeders underground along existing easements could occur within areas that have habitat for, or may otherwise affect, special-status species. The impact is potentially significant, and this issue will be further analyzed in the PEIR.

CONCLUSION: Impacts would be potentially significant for new development, expansions, and other distribution system improvements. This issue for new development, expansions, and other distribution system improvements will be further analyzed in the PEIR. Less than significant impacts would occur related to minor improvements, and therefore, will not be further analyzed in the PEIR.

- 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?**

New Development and Expansions

Potentially Significant Impact. Development of new distributing substations would occur within the four identified study areas, including the Sun Valley Study Area, Silver Lake Study Area, Southeast Study Area, and Wilmington Study Area. Expansions would involve expanding the footprint of an existing substation and may require acquisition of one or more adjacent properties. While LADWP's in-basin service area comprises land that has been predominantly built out and highly disturbed, both new development and expansions could occur within areas that have riparian habitat or other sensitive natural communities. The impact is potentially significant, and this issue will be further analyzed in the PEIR.

Minor Improvements

No Impact. Minor improvements at existing substations would be limited to the existing station property, which is already developed and disturbed. Thus, there is no potential for riparian

habitat or other sensitive natural communities to occur in these areas. Therefore, no impact to riparian habitat or other sensitive natural communities would occur. This issue related to minor improvements will not be further analyzed in the PEIR.

Other Distribution System Improvements

Potentially Significant Impact. Other distribution system improvements could include installation of subtransmission lines and feeders underground along existing road rights-of-way or easements, removal of existing pole-top transformer racks, deactivation of existing distributing substations, and other ancillary improvements at sites containing existing distribution system infrastructure. The areas along existing road rights-of-way and at sites containing existing infrastructure are developed and disturbed, and have no potential to impact riparian habitat or other sensitive natural communities. However, installation of subtransmission lines and feeders underground along existing easements could occur within areas that have riparian habitat or other sensitive natural communities. The impact is potentially significant, and this issue will be further analyzed in the PEIR.

CONCLUSION: Impacts would be potentially significant for new development, expansions, and other distribution system improvements. This issue for new development, expansions, and other distribution system improvements will be further analyzed in the PEIR. No impact would occur related to minor improvements, and therefore, will not be further analyzed in the PEIR.

- 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?**

New Development and Expansions

Potentially Significant Impact. Development of new distributing substations would occur within the four identified study areas, including the Sun Valley Study Area, Silver Lake Study Area, Southeast Study Area, and Wilmington Study Area. Based on a review of the U.S. Fish and Wildlife Service National Wetlands Inventory, there are no wetlands located within the Southeast Study Area. Therefore, no impacts to wetlands would occur in the Southeast Study Area. The Silver Lake Study Area only contains wetlands at the Silver Lake Reservoir, designated as a “lake”, and Echo Park Lake, designated as “freshwater emergent wetland” and “freshwater pond”. However, LADWP would not construct a new distributing substation on land at Silver Lake Reservoir or Echo Park Lake that is identified as a wetland. As new development in the Silver Lake, Sun Valley Study Area, and Wilmington Study Area has the potential to impact wetlands, the impact is potentially significant, and new development will be further analyzed in the PEIR.

Expansions would involve expanding the footprint of an existing substation and may require acquisition of one or more adjacent properties. While LADWP’s in-basin service area comprises land that has been predominantly built out and highly disturbed, expansions that require acquisition of property could occur within areas that have wetlands. The impact is potentially significant, and this issue will be further analyzed in the PEIR.

Minor Improvements

No Impact. Minor improvements at existing substations would be limited to the existing station property, which is already developed and disturbed. Thus, there is no potential for wetlands to

occur in these areas. Therefore, no impact to state or federally protected wetlands would occur. This issue related to minor improvements will not be further analyzed in the PEIR.

Other Distribution System Improvements

Potentially Significant Impact. Other distribution system improvements could include installation of subtransmission lines and feeders underground along existing road rights-of-way or easements, removal of existing pole-top transformer racks, deactivation of existing distributing substations, and other ancillary improvements at sites containing existing distribution system infrastructure. The areas along existing road rights-of-way and at sites containing existing infrastructure are developed and disturbed, and have no potential to impact wetlands. However, installation of subtransmission lines and feeders underground along existing easements could occur in undeveloped areas that have wetlands. The impact is potentially significant, and this issue will be further analyzed in the PEIR.

CONCLUSION: Impacts would be potentially significant for new development, expansions, and other distribution system improvements. This issue for new development, expansions, and other distribution system improvements will be further analyzed in the PEIR. No impact would occur related to minor improvements, and therefore, will not be further analyzed in the PEIR.

- 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?**

New Development and Expansions

Potentially Significant Impact. In an urban context, such as with LADWP's in-basin service area, 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. While the four study areas for new distributing substations are primarily developed, the new distributing substations would require acquisition of properties, which could serve as an area of localized wildlife movement. Expansions would involve expanding the footprint of an existing substation and may require acquisition of one or more adjacent properties. While LADWP's in-basin service area comprises land that has been predominantly built out and highly disturbed, expansions that require acquisition of property could occur within areas that have localized wildlife movement. The impact is potentially significant, and this issue will be further analyzed in the PEIR.

Minor Improvements

No Impact. Minor improvements at existing substations would be limited to the existing station property, which is already developed and disturbed. Thus, there is no potential for minor improvements to interfere with the movement of any fish or wildlife species, established migratory wildlife corridors, or wildlife nursery sites. Therefore, no impact would occur. This issue related to minor improvements will not be further analyzed in the PEIR.

Other Distribution System Improvements

Potentially Significant Impact. Other distribution system improvements could include installation of subtransmission lines and feeders underground along existing road rights-of-way

or easements, removal of existing pole-top transformer racks, deactivation of existing distributing substations, and other ancillary improvements at sites containing existing distribution system infrastructure. The areas along existing road rights-of-way and at sites containing existing infrastructure are developed and disturbed, would not occur within areas that have localized wildlife movement, and would not result in the physical division of land. However, installation of subtransmission lines and feeders underground along existing easements could occur in undeveloped areas that have localized wildlife movement. The impact is potentially significant, and this issue will be further analyzed in the PEIR.

CONCLUSION: Impacts would be potentially significant for new development, expansions, and other distribution system improvements. This issue for new development, expansions, and other distribution system improvements will be further analyzed in the PEIR. No impact would occur related to minor improvements, and therefore, will not be further analyzed in the PEIR.

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

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Less Than Significant Impact. New development, expansions, minor improvements, and other distribution system improvements may require the removal or pruning of native protected tree species or street trees. Native tree species protected under the City's Native Tree Protection Ordinance (Ordinance No. 177404) include oak trees indigenous to California [but excluding scrub oak (*Q. dumosa*)]; southern California black walnut (*Juglans californica*); western sycamore; 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 (*Sambucus mexicana*) and Toyon (*Heteromeles arbutifolia*) to the class of protected trees and shrubs. Pursuant to the ordinance, native trees that were planted or grown as part of a tree planting program are not considered protected trees. 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. Pruning would require a permit and must comply with the pruning standards set forth by the Western Chapter of the International Society of Arboriculture in a manner that does not cause permanent damage or adversely affect the health of the trees. Per the ordinance, the tree removal permit may require replanting of native trees within the vicinity if possible or, if not, at another location within the City to mitigate for the removal of trees. The ordinance requires the size and number of replacement trees to approximate the value of the tree or shrub removed.

The City of Los Angeles Department of Public Works also manages removal, replacement, and maintenance of the City's street trees and landscaped median islands. "Street trees" are those occurring in the public right-of-way, and a permit from Public Works Urban Forestry Division is required to remove a street tree. Under Los Angeles Municipal Code Section 62.170, as a condition to the permit, the permittee may be required to plant another tree of the type and size specified in the permit. However, in accordance with Los Angeles Municipal Code Section 62.177, a payment of in-lieu fees for the purchase, installation, and maintenance of trees is allowable when the required replacement trees cannot feasibly be planted on site.

In the event it is determined that native tree species or street trees would require removal to accommodate activities under the Proposed Program, LADWP would obtain the necessary

permits from the City of Los Angeles Department of Public Works, and the appropriate compensation to mitigate any street tree removals would be completed in compliance with the City's street tree policy. With adherence to existing regulations and permitting requirements, the Proposed Program would not conflict with any local policies or ordinances protecting biological resources. The impact would be less than significant, and this issue will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

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?

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

No Impact. No adopted Habitat Conservation or Natural Community Conservation Plans coincide with the boundaries of the City.³⁴ Portions of the City, and thus, some existing substations and associated infrastructure, are located within the boundaries of Significant 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 existing substations and associated infrastructure, which are located in an incorporated area of Los Angeles County. Therefore, the Proposed Program would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, and no impact would occur. This issue will not be further analyzed in the PEIR.

CONCLUSION: No impact would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

³⁴ California Department of Fish and Wildlife. Natural Community Conservation Plans, Map. Available at: <https://wildlife.ca.gov/Conservation/Planning/NCCP/Plans>, accessed March 23, 2026.

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?	☒	☐	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☒	☐	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☒	☐	☐	☐

Discussion

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

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Potentially Significant 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 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 California Register of Historical Resources 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.

Due to the varied age of LADWP's existing substations, many of which are over 50 years old, and the presence of numerous historical resources located within the City that may be directly or indirectly affected by the Proposed Program, impacts related to historical resources are considered potentially significant. This issue will be further analyzed in the PEIR.

CONCLUSION: Impacts would be potentially significant for the Proposed Program. This issue will be further analyzed in the PEIR.

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

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Potentially Significant Impact. While LADWP's in-basin service area comprises land that has been predominantly built out and highly disturbed due to past construction activities, the Proposed Program would include ground-disturbing activities that have the potential to impact unknown archaeological resources. The impact is potentially significant, and this issue will be further analyzed in the PEIR.

CONCLUSION: Impacts would be potentially significant for the Proposed Program. This issue will be further analyzed in the PEIR.

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

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Potentially Significant Impact. LADWP's in-basin service area comprises land that has been predominantly built out and is highly disturbed due to past construction activities. Additionally, LADWP would not construct a new distributing substation or an expansion in any parcels identified as a dedicated cemetery.

In the event that human remains are discovered, the remains would be treated in accordance with all applicable regulations. In accordance with the provisions of the California Health and Safety Code Section 7050.5, in the event that human remains are discovered during construction of the Proposed Program, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains would occur, and the Los Angeles County Coroner would be notified. The coroner would provide recommendations concerning the treatment and disposition of the human remains within two working days. If the remains and/or any related resources are determined to be of Native American origin, the coroner would contact the California Native American Heritage Commission within 24 hours. In accordance with California Public Resources Code Section 5097.98, the California Native American Heritage Commission would notify the person it believes to be most likely descended from the deceased Native American. The most likely descendant would be given access to the site where the remains were discovered and may make recommendations for the treatment and disposition of the remains and any related resources, as well as provide input regarding the potential for other remains to be present. Work at the discovery site may commence only after consultation with the most likely descendent and treatment of the remains and any associated resources have been concluded. Work may continue on other parts of the specific project site

while consultation and treatment are conducted.

While projects under the Proposed Program would adhere to regulatory requirements, as the Proposed Program would include ground-disturbing activities, the potential to disturb human remains will be further analyzed in the PEIR.

CONCLUSION: Impacts would be potentially significant for the Proposed Program. This issue will be further analyzed in the PEIR.

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?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

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?

Energy resources required for the construction of new distributing substations, expansions and minor improvements at existing substations, and other distribution system improvements would include electricity and petroleum, the consumption of which would be spread over the life of the Program (planning horizon year 2045) and are expected to be less intensive in the future as regulations become more stringent and technology becomes more efficient. For context, in California, 13.4 billion gallons of gasoline and 3.5 billion gallons of diesel (including offroad diesel) were sold in 2024, the most recent data that includes both gasoline and diesel sales.^{35,36} In fiscal year 2023-24, LADWP supplied more than 20,749 gigawatt-hours (GWh) of power.

Electricity would be required for the operation of any necessary construction trailers and electrically powered tools and equipment, and would be provided through a connection to the LADWP grid. The electricity consumed for construction activities would be temporary and relatively minimal, and, therefore, would not be considered wasteful, inefficient, or unnecessary.

The use of petroleum resources during construction would include gasoline for on-road vehicles and diesel fuel for heavy duty on-road trucks and off-road equipment. The primary petroleum resource consumed during construction would be diesel fuel. The Proposed Program would be subject to the California Air Resources Board (CARB) In-Use Off-Road Diesel Vehicle Regulation, which applies to certain off-road diesel engines, vehicles, or equipment greater than 25 horsepower. The regulation imposes limits on idling and requires a written idling policy; requires all vehicles to be reported to CARB (using the Diesel Off-Road Online Reporting System) and labeled; restricts the adding of older vehicles into fleets starting on January 1, 2014; and requires reductions in fleet emissions by retiring, replacing, or repowering older engines, or installing verified diesel emission control strategies (i.e., exhaust retrofits). It must be

³⁵ California Energy Commission. California Gasoline Data, Facts, and Statistics. Available at: <https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/california-gasoline-data-facts-and-statistics>, accessed April 23, 2026.

³⁶ California Energy Commission. Diesel Fuel Data, Facts, and Statistics. Available at: <https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/diesel-fuel-data-facts-and-statistics#:~:text=See%20California%20Retail%20Gasoline%20and,identical%20to%20petroleum%20based%20diesel>, accessed April 23, 2026.

demonstrated that the fleet average index was less than or equal to the calculated fleet average target rate, or that the fleet has met the best achievable control technology (BACT) requirements. Additionally, compliance with the *Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling* (as codified in Title 13 California Code of Regulations Section 2485) would prohibit heavy-duty trucks from idling for more than five minutes in any one particular location, which would prevent excess diesel fuel consumption. In accordance with the CARB Truck and Bus Regulation, all heavy-duty trucks involved in construction activities would also be required to have 2010 or newer model engines, which would establish a baseline for minimum allowable fuel efficiency and prohibit the contracting of older, less fuel-efficient trucks.

Discussions of the construction and operational energy demands are detailed below for each component under the Proposed Program.

New Development

Less Than Significant Impact. The development of four new distributing substations would involve the use of heavy equipment during major construction activities such as site preparation, excavation, foundations and structures, cabling, and, if necessary, demolition. Construction of the four new distributing substations is expected to begin in 2030 and be completed in 2041, with each station being developed over approximately three years. In total construction activities for each new distributing substation would take approximately three years, followed by testing and commissioning. Additionally, it is anticipated that construction of a new distributing substation would require an average of 20 crew worker trips daily and 90 total haul truck trips. Because the construction of each new distributing substation would be temporary, would comply with the energy efficiency standards described above, and would not be unusual compared to overall local and regional demand for energy resources, construction of the four new distributing substations would not result in wasteful, inefficient, or unnecessary consumption of energy resources.

Future operation of the new distributing substations would require electricity for various purposes, such as the control house, HVAC, lighting, and operation of equipment. Specifically, the new distributing substations are forecasted to increase electricity consumption by approximately 15,000 kilowatt-hours (kWh) per year at each of the four locations, for a total of approximately 60,000 kWh or 60 MWh annually. For context, in fiscal year 2023-24, LADWP supplied more than 20,749 gigawatt-hours (GWh) of power. Thus, the incremental increase (0.0003 percent) from operation of four new distributing substations would not place a burden on the LADWP distribution network, and the new distributing substations would be implemented specifically to accommodate growth in systemwide demand in the future and alleviate loading on existing substations. In addition, as with existing stations, the new distributing substations would be primarily automated and remotely monitored via a SCADA system. The stations would undergo occasional inspection, maintenance, or testing visits by personnel. Both inspection and maintenance trips by maintenance personnel would require the consumption of gasoline for commuting to and from the new distributing substations, and the occasional use of power tools and other equipment on-site would require nominal amounts of electricity and diesel fuel to perform the work. However, the new distributing substations would improve reliability of the distribution system and provide proactive replacement and maintenance of the infrastructure in the system, which could help offset the frequency of necessary vehicle trips to perform maintenance services at other stations. LADWP is also in the process of electrifying its vehicle fleet (e.g., with over 400 zero-emission vehicles in use in 2024) and made a commitment to only purchase new zero-emission medium- and heavy-duty vehicles beginning in 2027, which would further offset energy use as electric vehicles are more efficient than gasoline vehicles.

Based on the above, the energy consumption associated with construction and operation of the new distributing substations would serve to enhance system reliability and are necessary to meet projected increases in electricity demand. Therefore, impacts related to wasteful, inefficient, or unnecessary energy consumption would be less than significant. This issue will not be further analyzed in the PEIR.

Expansions

Less Than Significant Impact. Expansions would involve expanding the footprint of an existing substation, and would install new equipment to modernize the existing substation, increase capacity, improve safety, and enhance reliability in the distribution system. The expansion proposed would depend on the size and configuration of the existing substation and design of the expansion. In some cases, an expansion may require acquisition of one or more adjacent properties. Construction activities associated with expansions for receiving substations could require up to a 40,000 square-foot site. Construction activities would be more intensive than new development of a distributing substation, and would require more ground disturbance, truck trips (vendor and haul), and daily average workers. However, the overall construction duration would be the same as a new distributing substation. It is anticipated that construction of a receiving substation expansion would require an average of 40 crew worker trips daily and a total of 140 haul truck trips. Construction activities associated with expansions for distributing substations would be up to the same size as a new distributing substation (i.e., 25,000 square feet). Thus, the analysis conservatively assumes that the construction activities and durations for each phase would be similar to new development. As with new development, the construction associated with each expansion would be temporary, would comply with the energy efficiency standards described above, and would not be unusual compared to overall local and regional demand for energy resources, construction of expansions would not result in wasteful, inefficient, or unnecessary consumption of energy resources.

While an expansion would increase capacity and the substation could consume more energy due to its larger footprint, the expansion would install modern equipment and provide improved reliability and remote control, which could help minimize the frequency of maintenance activities and associated gasoline consumed by worker trips. Overall, expansions of existing substations would help alleviate loads and help meet the growing demand for electricity to ensure the delivery of reliable power throughout the City. Therefore, the construction and operation of expanded substations would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant, and this issue will not be further analyzed in the PEIR.

Minor Improvements

Less Than Significant Impact. Minor improvements to existing substations would include upgrades to modernize and replace equipment, adding equipment to vacant positions, and improvements to substation security and protection. Such minor improvements would require minimal construction and/or ground-disturbance with shorter construction durations, fewer pieces of heavy construction equipment, and fewer number of on-site daily workers compared to new distributing substations or expansions. The construction associated with each minor improvement would be temporary, would comply with the energy efficiency standards described above, and would not be unusual compared to overall local and regional demand for energy resources. Thus, construction of minor improvements would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Once operational, such minor improvements at existing substations would result in energy consumption that is essentially the same as existing

conditions. While the minor improvements could indirectly expand capacity because modern equipment components are more efficient, any increased capacity would not result in increased energy consumption. Therefore, construction and operation of minor improvements at existing substations would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant, and this issue will not be further analyzed in the PEIR.

Other Distribution System Improvements

Less Than Significant Impact. Other distribution system improvements would include, but not be limited to, upgrades to subtransmission lines and feeders, removal of existing pole-top transformer racks, deactivation of existing distributing substations, and other ancillary improvements. Construction activities would depend on the type of system improvement, but would require the use of various construction equipment that would consume diesel and electricity, and construction vehicles (haul trips and construction crew trips) that would consume diesel and gasoline. The construction associated with other distribution system improvements would be temporary, would comply with the energy efficiency standards described above, and would not be unusual compared to overall local and regional demand for energy resources. Thus, construction of other distribution system improvements would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Once operational, the proposed improvements would not result in wasteful, inefficient, or unnecessary consumption of energy resources, but would instead improve power flow, increase circuit capacity, and provide system redundancy and operational flexibility, which would increase the reliability of electric service to customers in the area by making electrical infrastructure more resilient and able to recover faster from outage events. Therefore, construction and operation of other distribution system improvements at existing substations would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant, and this issue will not be further analyzed in the PEIR.

CONCLUSION: Impacts would be less than significant for new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

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

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

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 (SLTRP, now known as LA100 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.

The Proposed Program aims to alleviate loads on existing substations, modernize aging distribution system infrastructure, meet the growing demand for electricity, and ensure the delivery of reliable power throughout the City. The new distributing substations, expansions, minor improvements to existing substations, and other distribution system improvements are

needed to meet projected increases in electricity demand driven by increased population density within the LADWP in-basin service area, growth of energy-intensive industries, and the electrification of functions currently powered by the combustion of fossil fuels. Specifically, the need to develop new distributing substations within the four identified study areas is based, in part, on the inability to improve existing stations because it is not feasible or would not substantially alleviate projected capacity shortfalls in an area. Therefore, implementation of the four new distributing substations would serve to address overloads and increase grid capacity. Although each new distributing substation would increase electricity consumption associated with LADWP infrastructure operations by approximately 15,000 kWh annually, the resulting benefits are crucial to achieving the objectives of LADWP's LA100 Plan (previously referred to as the SLTRP) to transition the City away from reliance on the combustion of fossil fuels to satisfy growing regional energy demand. Implementation of expansions and minor improvements at existing substations as well as other distribution system improvements would have no potential to conflict with or obstruct plans designed to increase regional energy efficiency and increase renewable energy supply. These proposed expansions and improvements would increase the reliability and efficacy of LADWP's electrical infrastructure system. Such Program components would be consistent with the statewide mandates requiring the expansion of LADWP's renewable energy portfolio and would not preclude LADWP from pursuing its LA100 Plan initiatives.

Implementation of the Proposed Program is fundamentally and inherently consistent with LADWP's LA100 Plan, and it is a critical component of the pathway to achieve a carbon-free energy system for the City by 2035—as outlined in the 2022 SLTRP—in accordance with the vision established by the Los Angeles 100% Renewable Energy Study. Between 2010 and 2020, LADWP met and exceeded its target of 15 percent cumulative energy savings.³⁷ The 2022 SLTRP determined that LADWP could achieve a further 15 percent improvement in energy efficiency between 2021 and 2027, and the Proposed Program would directly contribute to accomplishing those additional energy savings. Therefore, the Proposed Program would result in no impact related to conflict with renewable energy plans and energy efficiency and this issue will not be further analyzed in the PEIR.

CONCLUSION: No impact would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

³⁷ Los Angeles Department of Water and Power. *2022 Power Strategic Long-Term Resource Plan*. 2022. Available at: https://www.ladwp.com/sites/default/files/2023-08/2022%20LADWP%20Power%20Strategic%20Long-Term%20Resource%20Plan_0.pdf.

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.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☒	☐
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☒	☐	☐	☐

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.**

New Development

Less Than Significant Impact. Development of new distributing substations would occur within the four identified study areas, including the Sun Valley Study Area, Silver Lake Study Area, Southeast Study Area, and Wilmington Study Area. According to the California Geological Survey, the fault zone nearest to the Sun Valley Study Area is the Sierra Madre Fault Zone, approximately 2 miles to the north. The fault zone nearest to the Silver Lake Study Area is the Hollywood Fault Zone, approximately 0.8 miles to the north.³⁸ The fault zone nearest to the Southeast Study Area is the Newport-Inglewood-Rose Canyon Fault Zone, approximately 4.3 miles to the west. The fault zone nearest to the Wilmington Study Area is the Newport-Inglewood-Rose Canyon Fault Zone, approximately 3.7 miles to the east. However, none of the four study areas are located within Alquist Priolo-Earthquake Fault Zones.³⁹

While none of the new distributing substations would be constructed within an Alquist Priolo-Earthquake Fault Zones, the new distributing substations would be designed and constructed in compliance with the latest version of the California Building Code (CBC) and City of Los Angeles Building Code and other applicable local, state, and federal codes to minimize impacts related to fault rupture. Furthermore, as required by LADWP standard construction procedures, a site-specific geotechnical assessment and a geologic fault investigation for each new distributing substation would be prepared prior to construction. The site-specific geotechnical assessments would provide design recommendations related to seismic criteria to ensure that the new distributing substations can withstand strong seismic ground shaking and other seismic hazards. As standard practice for all LADWP facility projects, the geotechnical recommendations will be incorporated as a requirement for construction and design of the proposed new distributing substations. During operation, as with existing stations, the new distributing substations would be primarily automated and remotely monitored via a SCADA system. The stations would undergo occasional inspection, maintenance, or testing visits by personnel. The new distributing substations are not structures for human occupancy, and as such, it is unlikely that rupture of a known earthquake fault would result in injury or death with development of the new distributing substations. Therefore, impacts related to potential adverse effects from the rupture of a known earthquake fault would be less than significant for new distributing substations, and this issue will not be further analyzed in the PEIR.

Expansions

Less Than Significant Impact. Expansions would involve expanding the footprint of an existing substation. The expansion proposed would depend on the size and configuration of the existing substation and design of the expansion. In some cases, an expansion may require acquisition of one or more adjacent properties. The majority of existing substations are not located within an Alquist-Priolo Earthquake Fault Zone. Only two substations, RS-RIN, and DS-93, are located within an Alquist-Priolo Earthquake Fault Zone and a number of substations are located near such zones.⁴⁰ Despite existing substations being located within known fault hazard zones, the

³⁸ California Department of Conservation, California Geological Survey. Earthquake Zones of Required Investigation. Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/>, accessed December 2025.

³⁹ California Department of Conservation, California Geological Survey. Earthquake Zones of Required Investigation. Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/>, accessed December 2025.

⁴⁰ California Department of Conservation, California Geological Survey. Earthquake Zones of Required Investigation. Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/>, accessed December 2025.

expansions would not include development of any habitable structures that could pose a risk to of loss, injury, or death involving fault rupture. As with new development, expansions would be designed and constructed in compliance with the latest version of the CBC and City of Los Angeles Building Code and other applicable local, state, and federal codes to minimize impacts related to fault rupture. Furthermore, depending on the design of the expansion, a site-specific geotechnical assessment may be required that would provide design recommendations related to seismic criteria to ensure that expansions can withstand strong seismic ground shaking. The operation of existing substations that undergo expansions would be similar to existing operations, which would involve automated systems, remote monitoring and control, and routine inspection, maintenance, or testing visits by personnel. As such, it is unlikely that rupture of a known earthquake fault would result in injury or death with implementation of expansions. Therefore, impacts related to potential adverse effects from the rupture of a known earthquake fault would be less than significant for expansions, and this issue will not be further analyzed in the PEIR.

Minor Improvements

Less Than Significant Impact. Minor improvements at existing substations would be limited to the existing station property and would not change the potential for substantial adverse effects involving the rupture of a known earthquake fault. As discussed for expansions, the majority of existing substations are not located within Alquist-Priolo Earthquake Fault Zones, two are located within such zones, and a number of substations are located near such zones.⁴¹ Despite existing substations being located within known fault hazard zones, the minor improvements would not include development of any habitable structures that could pose a risk to of loss, injury, or death involving fault rupture. The minor improvements would be designed and constructed in compliance with the latest version of the CBC and City of Los Angeles Building Code and other applicable local, state, and federal codes to minimize impacts related to fault rupture. Minor improvements, such as the potential installation of a perimeter wall for security purposes, would adhere to site-specific geotechnical recommendations, as needed, to ensure that the improvements can withstand strong seismic ground shaking. The operation of existing substations that undergo minor improvements would be similar to existing operations, which would involve automated systems, remote monitoring and control, and routine inspection, maintenance, or testing visits by personnel. As such, it is unlikely that rupture of a known earthquake fault would result in injury or death with the implementation of minor improvements. Therefore, impacts related to potential adverse effects from the rupture of a known earthquake fault would be less than significant for minor improvements, and this issue will not be further analyzed in the PEIR.

Other Distribution System Improvements

Less Than Significant Impact. Other distribution system improvements could include, but not be limited to, upgrades to subtransmission lines and feeders, removal of existing pole-top transformer racks, deactivation of existing distributing substations, and other ancillary improvements. Upgrades to subtransmission lines and feeders may be located within Alquist-

⁴¹ California Department of Conservation, California Geological Survey. Earthquake Zones of Required Investigation. Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/>, accessed December 2025.

Priolo Earthquake Fault Zones.⁴² New sub-transmission lines and feeders that would be installed or extended underground would involve construction activities that require ground disturbance and trenching that may be located within or near fault zones. However, the other distribution system improvements would not include development of any habitable structures that could pose a risk to of loss, injury, or death involving fault rupture. Moreover, the construction and design of the other distribution system improvements would require compliance with the latest version of the CBC and City of Los Angeles Building Code and other applicable local, state, and federal codes to minimize impacts related to fault rupture. Removal of existing pole-top transformer rack equipment and deactivation of existing distributing substations would not change the potential for substantial adverse effects involving the rupture of a known earthquake fault. As such, it is unlikely that rupture of a known earthquake fault would result in injury or death with implementation of proposed distribution system improvements. Therefore, impacts related to potential adverse effects from the rupture of a known earthquake fault would be less than significant for proposed distribution system improvements, and this issue will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

ii. Strong seismic ground shaking?

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Less Than Significant Impact. The Proposed Program would be implemented within the City of Los Angeles, which is located within a seismically active region, and as with all locations in Southern California, is potentially subject to strong seismic ground shaking. Despite the Program components being located within known fault hazard zones, none of the components would include the development of any habitable structures that could pose a risk to of loss, injury, or death involving strong seismic ground shaking. Additionally, as discussed in Section 3.7(a)(i) above, the proposed components would be designed and constructed in compliance with the latest version of the CBC and City of Los Angeles Building Code and other applicable local, state, and federal codes to minimize impacts related to seismic ground shaking. Furthermore, site-specific geotechnical assessments would be prepared, as necessary, prior to construction activities to provide design recommendations related to seismic criteria as part of LADWP's standard construction procedures. Therefore, impacts related to strong seismic ground shaking would be less than significant, and this issue will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

iii. Seismic-related ground failure, including liquefaction?

Liquefaction occurs when loosely packed, water-saturated sediments at or near the ground

⁴² California Department of Conservation, California Geological Survey. Earthquake Zones of Required Investigation. Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/>, accessed December 2025.

surface lose their strength in response to strong or extended periods of seismic shaking, which in turn, may cause damage or the failure of structures.

New Development

Less Than Significant Impact. Development of new distributing substations would occur within the four identified study areas, including the Sun Valley Study Area, Silver Lake Study Area, Southeast Study Area, and Wilmington Study Area. According to the California Geological Survey, the Sun Valley Study Area does not contain identified liquefaction zones while the Silver Lake Study Area, Southeast Study Area, and Wilmington Study Area contain identified liquefaction zones.⁴³ Specifically, liquefaction zones have been identified within eastern and southern portions of the Southeast Study Area, the southwestern portion of the Wilmington Study Area, and eastern and northern portions of the Silver Lake Study Area.⁴⁴ Notwithstanding, as discussed, site-specific geotechnical assessments would be prepared for the new distributing substations, which would include soil sampling and subsurface boring testing to evaluate liquefaction risk at the specific project sites and recommend design measures to minimize risks, as necessary. As standard practice for all LADWP facility projects, the geotechnical recommendations will be incorporated as a requirement for construction and design of the proposed new distributing substations. During operation, as with existing stations, the new distributing substations would be primarily automated and remotely monitored via a SCADA system. The stations would undergo occasional inspection, maintenance, or testing visits by personnel. The new distributing substations are not structures for human occupancy, and as such, it is unlikely that seismic-related ground failure, including liquefaction, would result in injury or death with development of the new distributing substations. Therefore, impacts related to potential substantial adverse effects involving liquefaction would be less than significant for new distributing substations, and this issue will not be further analyzed in the PEIR.

Expansions

Less Than Significant Impact. Expansions would involve expanding the footprint of an existing substation and would install new equipment to modernize the existing substation, increase capacity, improve safety, and enhance reliability in the distribution system. The expansion proposed would depend on the size and configuration of the existing substation and design of the expansion. In some cases, an expansion may require acquisition of one or more adjacent properties. According to the California Geological Survey, LADWP's in-basin service area includes a mix of substations located within and outside of identified liquefaction zones.⁴⁵ Any expansion of a substation located outside of a liquefaction zone would result in no impact related to potential substantial adverse effects involving liquefaction.

Existing substations located within liquefaction zones would not include development of any habitable structures that could pose a risk to of loss, injury, or death involving liquefaction. As with new development, if an expansion is proposed within an identified liquefaction zone, the

⁴³ California Department of Conservation, California Geological Survey. Earthquake Zones of Required Investigation. Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/>, accessed December 2025.

⁴⁴ California Department of Conservation, California Geological Survey. Earthquake Zones of Required Investigation. Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/>, accessed December 2025.

⁴⁵ California Department of Conservation, California Geological Survey. Earthquake Zones of Required Investigation. Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/>, accessed December 2025.

expansions would be designed and constructed in compliance with the latest version of the CBC and City of Los Angeles Building Code and other applicable local, state, and federal codes to minimize impacts related to liquefaction. Furthermore, depending on the design of the expansion, a site-specific geotechnical assessment may be prepared prior to construction to evaluate liquefaction risk at the expansion site and recommend design measures to ensure that expansions can withstand liquefaction as necessary. The operation of existing substations that undergo expansions would be similar to existing operations, which would involve automated systems, remote monitoring and control, and routine inspection, maintenance, or testing visits by personnel. As such, it is unlikely that seismic-related ground failure, including liquefaction, would result in injury or death with implementation of expansions. Therefore, impacts related to potential substantial adverse effects involving liquefaction would be less than significant for expansions, and this issue will not be further analyzed in the PEIR.

Minor Improvements

Less Than Significant Impact. Minor improvements at existing substations would be limited to the existing station property and would not change the potential for substantial adverse effects involving liquefaction. As previously described, according to the California Geological Survey, LADWP's in-basin service area includes a mix of existing substations that are located within and outside of identified liquefaction zones.⁴⁶ Any minor improvement to existing substations located outside of a liquefaction zone would result in no impact related to potential substantial adverse effects involving liquefaction. Despite existing substations being located within identified liquefaction zones, the minor improvements would not include development of any habitable structures that could pose a risk to of loss, injury, or death involving liquefaction. The minor improvements would be designed and constructed in compliance with the latest version of the CBC and City of Los Angeles Building Code and other applicable local, state, and federal codes. Minor improvements such as the potential installation of a perimeter wall for security purposes would adhere to site-specific geotechnical recommendations, as needed, to ensure that the improvements can withstand liquefaction. The operation of existing substations that undergo minor improvements would be similar to existing operations, which would involve automated systems, remote monitoring and control, and routine inspection, maintenance, or testing visits by personnel. As such, it is unlikely that seismic-related ground failure, including liquefaction, would result in injury or death with the implementation of minor improvements. Therefore, impacts related to potential substantial adverse effects involving liquefaction would be less than significant for minor improvements, and this issue will not be further analyzed in the PEIR.

Other Distribution System Improvements

Less Than Significant Impact. Other distribution system improvements could include, but not be limited to, upgrades to subtransmission lines and feeders, removal of existing pole-top transformer racks, deactivation of existing distributing substations, and other ancillary improvements. Existing subtransmission lines and feeders, pole-top transformer racks, and substations are located both within and outside of identified liquefaction zones.⁴⁷ Extension of

⁴⁶ California Department of Conservation, California Geological Survey. Earthquake Zones of Required Investigation. Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/>, accessed December 2025.

⁴⁷ California Department of Conservation, California Geological Survey. Earthquake Zones of Required Investigation. Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/>, accessed December 2025.

subtransmission lines and feeders, removal of pole-top distributing equipment, deactivation of existing distributing substations, and other ancillary improvements located outside of a liquefaction zone would result in no impact related to potential substantial adverse effects involving liquefaction.

New subtransmission lines and feeders that would be installed or extended underground would involve construction activities that require ground disturbance and trenching that may be located within identified liquefaction zones. However, the other distribution system improvements would not include development of any habitable structures that could pose a risk to loss, injury, or death involving liquefaction. Moreover, the construction and design of other distribution system improvements would require compliance with the latest version of the CBC and City of Los Angeles Building Code and other applicable local, state, and federal codes. Removal of existing pole-top transformer rack equipment and deactivation of existing distributing substations would not change the potential for substantial adverse effects involving liquefaction. Therefore, impacts related to potential substantial adverse effects involving liquefaction would be less than significant for the proposed system improvements, and this issue will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

iv. Landslides?

Landslides are generally defined as the rapid downward movement of rocks, soil, and earth, often carried and/or exacerbated by water, down a steep slope (i.e., a cliff, mountain, or hill).

New Development

Less Than Significant Impact. Development of new distributing substations would occur within the four identified study areas, including the Sun Valley Study Area, Silver Lake Study Area, Southeast Study Area, and Wilmington Study Area. According to the California Department of Conservation's Geological Survey, the Southeast Study Area and Wilmington Study Area do not contain identified landslide zones while the Sun Valley Study Area and Silver Lake Study Area contain identified landslide zones.⁴⁸ However, LADWP would not construct new distributing substations within identified landslide zones in the Sun Valley Study Area and Silver Lake Study Area.

Development of new distributing substations would be considered in non-landslide zones and designed and constructed in compliance with the latest version of the CBC and City of Los Angeles Building Code and other applicable local, state, and federal codes. Furthermore, as required by LADWP standard construction procedures, a site-specific geotechnical assessment for each new distributing substation would be prepared prior to construction. The site-specific geotechnical assessments would provide design recommendations related to grading, soil conditions, and foundations to ensure that the new distributing substations are structurally stable. Moreover, during operation, as with existing stations, the new distributing substations would be primarily automated and remotely monitored via a SCADA system. The stations would

⁴⁸ California Department of Conservation, California Geological Survey. Earthquake Zones of Required Investigation. Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/>, accessed December 2025.

undergo occasional inspection, maintenance, or testing visits by personnel. As such, it is unlikely that risk of landslides would result in injury or death with development of the new distributing substations. Therefore, with implementation of the design measures from site-specific geotechnical assessments, impacts related to potential substantial adverse effects involving landslides would be less than significant for new distributing substations, and this issue will not be further analyzed in the PEIR.

Expansions

Less Than Significant Impact. Expansions would involve expanding the footprint of an existing substation and would install new equipment to modernize the existing station, increase capacity, improve safety, and enhance reliability in the distribution system. The expansion proposed would depend on the size and configuration of the existing substation and design of the expansion. In some cases, an expansion may require acquisition of one or more adjacent properties. The majority of existing substations are not located within identified landslide zones; only a few existing substations are located within or adjacent to landslide zones.⁴⁹ Any expansion of a substation located outside of a landslide zone would result in no impact related to potential substantial adverse effects involving landslides.

Existing substations located within landslide zones would not include development of any habitable structures that could pose a risk of loss, injury, or death involving landslides. As with new development, expansions would be designed and constructed in compliance with the latest version of the CBC and City of Los Angeles Building Code and other applicable local, state, and federal codes to minimize impacts related to landslides. Furthermore, depending on the design of the expansion and for any expansions into adjacent acquired properties within an identified landslide zone, then additional site investigation would be conducted to assess risks, including, but not limited to grading, slope configuration, retaining structures, foundations, and ground improvement. A site-specific geotechnical assessment for the site would be prepared prior to construction and recommend design measures as necessary. The operation of existing substations that undergo expansions would be similar to existing operations, which would involve automated systems, remote monitoring and control, and routine inspection, maintenance, or testing visits by personnel. As such, it is unlikely that landslides would result in injury or death with implementation of expansions. Therefore, impacts related to potential substantial adverse effects involving landslides would be less than significant for expansions, and this issue will not be further analyzed in the PEIR.

Minor Improvements

Less Than Significant Impact. Minor improvements at existing substations would be limited to the existing station property and would not change the potential for substantial adverse effects involving landslides. As previously discussed, the majority of existing substations are not located within identified landslide zones; only a few existing substations are located within or adjacent to landslide zones.⁵⁰ Any minor improvement to existing substations located outside of a landslide zone would result in no impact related to potential substantial adverse effects

⁴⁹ California Department of Conservation, California Geological Survey. Earthquake Zones of Required Investigation. Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/>, accessed December 2025.

⁵⁰ California Department of Conservation, California Geological Survey. Earthquake Zones of Required Investigation. Interactive Map. Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/>, accessed December 2025.

involving landslides. Despite several existing substations being located within identified landslide zones, the minor improvements would not include development of any habitable structures that could pose a risk to of loss, injury, or death involving landslides. Minor improvements such as the potential installation of a perimeter wall for security purposes would adhere to site-specific geotechnical recommendations, as needed, to ensure that the improvements can withstand a landslide. The operation of existing substations that undergo minor improvements would be similar to existing operations, which would involve automated systems, remote monitoring and control, and routine inspection, maintenance, or testing visits by personnel. As such, it is unlikely that landslides, would result in injury or death with the implementation of minor improvements. Therefore, impacts related to potential substantial adverse effects involving landslides would be less than significant for minor improvements, and this issue will not be further analyzed in the PEIR.

Other Distribution System Improvements

Less Than Significant Impact. Other distribution system improvements would include, but not be limited to, upgrades to subtransmission lines and feeders, removal of existing pole-top transformer racks, deactivation of existing distributing substations, and other ancillary improvements. Existing subtransmission lines and feeders, pole-top transformer racks, and substations are located both within and outside of identified landslide zones.⁵¹ Extension of subtransmission lines and feeders, removal of pole-top distributing equipment, deactivation of existing distributing substations, and other ancillary improvements located outside of a landslide zone would result in no impact related to potential substantial adverse effects involving landslides.

New subtransmission lines and feeders would be installed or extended underground would involve construction activities would require ground disturbance and trenching that may be located within identified landslide zones. However, the other distribution system improvements would not include development of any habitable structures that could pose a risk to of loss, injury, or death involving liquefaction. Moreover, the construction and design of other distribution system improvements would require compliance with the latest version of the CBC and City of Los Angeles Building Code and other applicable local, state, and federal codes. Other distribution system improvements would not change the potential for substantial adverse effects involving landslides. Therefore, impacts related to potential substantial adverse effects involving landslides would be less than significant for other distribution system improvements, and this issue will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

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

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Less Than Significant Impact. Under the Proposed Program, the construction of new

⁵¹ California Department of Conservation, California Geological Survey. Earthquake Zones of Required Investigation. Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/>, accessed December 2025.

distributing substations, expansions of existing substations, minor improvements, and other distribution system improvements would result in ground disturbance during excavation, grading, trenching, and other construction activities that could create the potential for erosion to occur. However, during construction, transport of sediments by stormwater runoff and wind would be prevented through BMPs, such as implementation of Rule 403 dust control measures required by the SCAQMD and stormwater pollution control measures required by LAMC Chapter VI, Article 4.4. If construction activities associated with a specific project would disturb more than one-acre (i.e., 43,650 square feet), LADWP would be required to prepare and implement a Construction Stormwater General Permit (SWRCB Order No. 2022-0057-DWQ) (Construction General Permit). The Construction General Permit would include requirements for stormwater discharges, effluent levels, treatment systems, and dewatering, amongst others. Additionally, the Construction General Permit would require the preparation of a site-specific Storm Water Pollution Prevention Plan (SWPPP) which would identify the sources of sediment and other pollutants that affect the quality of stormwater discharges, describe and ensure the implementation of site-specific BMPs to reduce or eliminate sediment and other pollutants in stormwater and non-stormwater discharges, and convey a plan to restore erosion protection and site hydrology post-construction. If activities for the specific project would disturb less than one acre, construction grading activities would be subject to the requirements of the LADBS grading and building permits, which would require implementation of measures and standards, such as the preparation of an erosion control plan and site-specific BMPs, designed to limit potential impacts associated with sedimentation and erosion to acceptable levels. With adherence to applicable regulations, construction impacts associated with soil erosion or the loss of topsoil would be less than significant.

Following completion of construction, specific project sites that undergo extensive development (i.e., new distributing substations and expansions) would be predominantly impervious, which could result in a change or increase in the volume and intensity of stormwater flows such that erosion created by runoff could occur. These projects would be required to comply with the Los Angeles County Municipal Separate Storm Sewer Systems (MS4) permit and the City's stormwater pollution control measures (LAMC Chapter VI, Article 4.4) to treat, capture, and reduce the volume of stormwater flows to the maximum extent feasible. Depending on the amount of disturbance and impervious surfaces created by implementation of the specific project, the project may be required to comply with the City's LID Ordinance (No. 188125), and undergo LID plan checks with LASAN, which would review specific project details such as hydrology calculations, BMP sizing documentation, and feasibility analyses. Implementation of minor improvements and other distribution system improvements would not substantially change the amount of pervious surfaces. However, minor improvements that include modifications for drainage would be required to comply with the City's stormwater pollution control measures (LAMC Chapter VI, Article 4.4) to treat, capture, and reduce the volume of stormwater flows to the maximum extent feasible, and would provide beneficial impacts for water quality. Roadways disturbed during construction for other distribution system improvements would be restored to pre-construction conditions for subtransmission lines and feeders and any holes associated with the removal of poles from a pole-top transformer rack would be filled. Therefore, with adherence to applicable regulations, impacts related to soil erosion or loss of topsoil would be less than significant, and this issue will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

- 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?**

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Less Than Significant Impact. As detailed above in Section 3.7(a)(iv), impacts related to landslides would be less than significant for projects under the Proposed Program.

Subsidence is the gradual settling, lowering, or collapse of the ground surface caused by natural geologic processes or human activities such as groundwater withdrawal, oil and gas extraction, or soil compaction. The Proposed Program would not involve activities such as the deliberate extraction of groundwater or oil that could result in, or increase the probability of, subsidence occurring. Nonetheless, site-specific geotechnical assessments would identify historic high groundwater levels for specific projects requiring construction activities that may affect surface and structural stability. As standard practice for all LADWP facility projects, the geotechnical recommendations will be incorporated as a requirement for construction and design of specific project. Therefore, impacts related to subsidence and collapse would be less than significant under the Proposed Program.

Lateral spreading is a type of liquefaction-induced ground failure on mildly sloping ground. As detailed in Section 3.7(a)(iii), liquefaction zones have been identified within eastern and northern portions of the Silver Lake Study Area, the eastern and southern portions of the Southeast Study Area, and the southwestern portion of the Wilmington Study Area. LADWP's in-basin service area also includes a mix of substations located within and outside of identified liquefaction zones. New distributing substations and expansions into adjacent acquired properties within liquefaction zones would be required to undergo a site-specific geotechnical assessment that would include soil sampling and subsurface boring testing prior to construction to evaluate liquefaction risk at the specific project site. The geotechnical investigation would recommend design measures to ensure that new distributing substations and expansions can withstand liquefaction, as necessary. Furthermore, construction of the Program components, including minor improvements and other distribution system improvements, would be designed and constructed in compliance with the latest version of the CBC and City of Los Angeles Building Code and other applicable local, state, and federal codes to minimize impacts related to liquefaction. Overall, specific projects under the Proposed Program would be designed based on soil conditions and would be constructed in accordance with all applicable local, state, and federal codes related to seismic and geologic criteria. Therefore, impacts related to lateral spreading and unstable soils would be less than significant, and this issue will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

- e) **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?**

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

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. Expansive soils may be located throughout the City. Although the program components may be constructed within areas with expansive soils, none of the components include development of any habitable structures that could pose a risk to life from expansive soils.

Under the Proposed Program, the construction of new distributing substations, expansions of existing substations, minor improvements, and other distribution system improvements would result in ground disturbance during excavation, grading, and trenching that could encounter expansive soils. As discussed above in Section 3.7(a), as required by LADWP standard construction procedures, site-specific geotechnical assessments for each new distributing substation and for some expansions, depending on the design, would be prepared prior to construction. Site-specific geotechnical assessments that identify expansive soils would provide project design recommendations to ensure structural stability, including, but not limited to, soil removal and replacement, compaction, moisture control, deep foundations, and stiffened or post-tensioned slabs. A site-specific geotechnical assessment may also be conducted for minor improvements such as the potential installation of a perimeter wall for security purposes, if necessary. In areas requiring trenching, such as for construction of subtransmission lines and feeders, trenches would be backfilled with cement slurry, which is not subject to expansion and contraction. Therefore, impacts related to direct or indirect risks to life or property from expansive soils would be less than significant, and this issue will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

- f) **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?**

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

No Impact. Under the Proposed Program, the construction of new distributing substations, expansions, minor improvements, and other distribution system improvements would not require septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur, and this issue will not be further analyzed in the PEIR.

CONCLUSION: No impact would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

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

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Potentially Significant Impact. While LADWP's in-basin service area comprises land that has been predominantly built out and highly disturbed due to past construction activities, the Proposed Program would include ground-disturbing activities that have the potential to impact unknown paleontological resources. The impact is potentially significant, and this issue will be further analyzed in the PEIR.

CONCLUSION: Impacts would be potentially significant for the Proposed Program. This issue will be further analyzed in the PEIR.

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?	☒	☐	☐	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐

Discussion

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

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Potentially Significant Impact. The Proposed Program includes planned improvements to the LADWP distribution system through the planning horizon year 2045. The Proposed Program includes construction of four new distributing substations, expansion of existing substations, minor improvements to existing substations, and related activities for other distribution system improvements. These activities would generate greenhouse gas (GHG) emissions during temporary construction activities and long-term operations. Construction would result in short-term GHG emissions produced by construction equipment exhaust as well as on-road truck and other vehicle trips. Operation of the new distributing substations and existing substations would result in GHG emissions from inspection and maintenance activities. This impact is considered potentially significant, and this issue will be further analyzed in the PEIR.

CONCLUSION: Impacts would be potentially significant for the Proposed Program. This issue will be further analyzed in the PEIR.

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

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Potentially Significant Impact. As discussed in Section 3.8(a), the Proposed Program would emit GHGs during temporary construction activities and long-term operations, which may conflict with GHG strategies and targets of applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Therefore, the impact is considered potentially significant, and this issue will be further analyzed in the PEIR.

CONCLUSION: Impacts would be potentially significant for the Proposed Program. This issue will be further analyzed in the PEIR.

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?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☒	☐	☐	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☒	☐	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 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?	☒	☐	☐	☐
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☒	☐	☐	☐

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?**

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Less Than Significant Impact. The Proposed Program proposes the development of four new distributing substations, expansions of existing substations, minor improvements, and other distribution system improvements. Construction of such projects could involve demolition of existing buildings, removal of existing equipment, and potential removal of buildings or equipment with asbestos-containing materials (ACM), lead-based paint (LBP), polychlorinated biphenyl (PCB)-containing materials, and/or other hazardous materials. If encountered, ACM, LBP, and PCB-containing materials would be removed and remediated in accordance with all applicable federal and state regulations regarding the disturbance, handling, and disposal of

debris, including but not limited to the following:

- SCAQMD Rule 1403 Asbestos Emissions from Demolition/Renovation Activities, which provides requirements for limiting asbestos emissions from building demolition and renovation activities.
- California Health and Safety Code, Sections 1529 and 5208, which address the health hazards of asbestos and defines permissible exposures. Section 5208 also requires exposure monitoring and compliance methods when dealing with asbestos.
- Occupational Safety and Health Administration (OSHA), Safety and Health Regulations for Construction, such as Standard Number 1926.62, which regulates the demolition, renovation, or construction of buildings involving lead materials and includes requirements for the safe removal and disposal of lead and the safe demolition of buildings containing LBP or other lead materials.
- 40 Code of Federal Regulations Part 761, Polychlorinated biphenyl (PCB) regulations, which governs PCB cleanup, characterization, decontamination, and disposal requirements. Guidance from the U.S. Environmental Protection Agency notes that PCB cleanup and disposal activities must follow the federal PCB Cleanup and Disposal Program, provisions for PCB remediation waste, and decontamination of PCB-contaminated surfaces or scrap metals.

If demolition is required, construction contractors handling ACM, LBP, and PCB-containing materials would be required to follow all applicable regulatory requirements and be registered with the State of California to perform asbestos work. The contractors would be required to work with a Certified Asbestos Consultant and a Lead Inspector/Assessor. Similarly, certified contractors would be required for the safe removal of equipment with PCB-containing materials. Therefore, with adherence to applicable regulations concerning ACM, LBP, and PCB-containing materials, construction of projects under the Proposed Program would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of ACM, LBP, and PCB-containing materials.

Construction activities would also involve the temporary transport, storage, and use of hazardous materials, such as fuels and lubricating fluids for construction equipment. Construction of projects under the Proposed Program could include use of paints, solvents, and other potentially hazardous materials. 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, OSHA, and the Los Angeles Fire Department. If necessary, soil sampling would occur in areas of disturbance to analyze for potential contaminants including but not limited to, releases of petroleum fuels, solvents, lubricants, oils, paints, corrosion inhibitors, volatile organic compounds, polycyclic aromatic hydrocarbons, polychlorinated biphenyls, metals, and other hazardous materials under California Code of Regulations Title 22, Division 4.5, Environmental Health Standards for the Management of Hazardous Waste. Once the types, characteristics, and quantities of any hazardous substances detected at specific project sites are determined, the management and disposition, including transportation, treatment, disposal, or recycling of identified hazardous substances would be in accordance with all applicable local, state, and federal environmental, health and safety laws, ordinances, and regulations.

Furthermore, all hazardous waste would be sent to State licensed treatment, storage, and disposal facilities that have been approved to accept such wastes. The disposal and recycling of wastes would strictly comply with all local, state, and federal laws, rules, and regulations.

concerning the disposal of all waste substances. Based on the above procedures, the impact related to a significant hazard through the routine transport, use, and disposal of these materials during construction of projects under the Proposed Program would be less than significant, and this issue will not be further analyzed in the PEIR.

Similar to existing substations, substation operations may require the use of hazardous materials that would be transported, used, and stored on site, such as cleaning solvents and cooling and insulating oils and gases. Substations would continue to be largely automated and remotely monitored via a SCADA system. Personnel would also conduct periodic inspections of the equipment, which would minimize the potential hazards during operation. Under the Proposed Program, the operation of new distributing substations would be similar to the operation of existing stations, and the operation of existing substations that are expanded or undergo minor improvements would be similar to existing operations. In addition, operation of other distribution system improvements would not require the routine use, transport, or disposal of hazardous materials. Any operational use of hazardous materials associated with the projects under the Proposed Program would be regulated by and subject to federal, state, and local health and safety requirements. As such, operation of the Proposed Program would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous, and this issue will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

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?

New Development and Expansions

Less Than Significant Impact. As detailed in Section 3.9(a) above, construction activities for new development and expansions would involve the transport, storage, use, and disposal of hazardous materials. These construction-related materials are not considered acutely hazardous and would be typical of construction in the City. Accident prevention, spill response, and containment involving these materials would be the responsibility of the LADWP or its construction contractors, and provisions to properly manage hazardous substances and waste would be included in the specific project's construction specifications. Additionally, risk of upset would be minimized through the handling, documentation, and disposal of hazardous materials and waste in accordance with federal, state, and local laws and regulations.

Given that the LADWP in-basin service area is extensive and includes areas with historical industrial and utility uses, the potential to encounter hazardous wastes and contaminated soils during excavation and other construction activities exists. For new development and expansions into adjacent acquired property, a site-specific Phase I Environmental Site Assessment would be prepared, as standard procedure for LADWP, to identify whether the site has any existing hazardous materials conditions and recommend measures to ensure that hazardous conditions are remediated prior to construction. The recommendations from the Phase I Environmental Site Assessment will be incorporated as a requirement for construction and design of the proposed new distributing substations and expansions.

Generally, modernization of the electrical distribution system and its associated equipment

would reduce the potential for upset and accident conditions as new equipment would have stricter safety protocols and meet current standards. During operation of the Proposed Program, as with existing substations, new distributing substations and expanded substations would be largely automated and remotely monitored via a SCADA system, which would allow portions of the substation to be shut down immediately in the event of an accident condition. LADWP would prepare an emergency response plan for operations and maintenance of the new distributing substations and update the plan for any expansions, as required by standard procedure, which would include procedures for hazards and hazardous materials in the event of an accident condition. Under the Proposed Program, the operation of new distributing substations would be similar to the operation of existing distributing substations, and the operation of existing substations that are expanded would be similar to existing operations. All activities involving the use of hazardous materials would be regulated by and subject to federal, state, and local health and safety requirements. As such, operation of the Proposed Program would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Operational impacts would be less than significant, and this issue will not be further analyzed in the PEIR.

Minor Improvements and Other Distribution System Improvements

Less Than Significant Impact. Similar to construction for new distributing substations and expansions, construction activities for minor improvements and other distribution system improvements would involve the transport, storage, use, and disposal of hazardous materials. These construction-related materials are not considered acutely hazardous and would be typical of construction in the City. Accident prevention, spill response, and containment involving these materials would be the responsibility of the LADWP or its construction contractors, and provisions to properly manage hazardous substances and waste would be included in the specific project's construction specifications. Additionally, risk of upset would be minimized through the handling, documentation, and disposal of hazardous materials and waste in accordance with federal, state, and local laws and regulations.

Generally, modernization of the electrical distribution system and its associated equipment would reduce the potential for upset and accident conditions as new equipment would have stricter safety protocols and meet current standards. Minor improvements would otherwise operate similarly to the existing conditions. All activities involving the use of hazardous materials would be regulated by and subject to federal, state, and local health and safety requirements. Operation of other distribution system improvements would not require the routine use, transport, or disposal of hazardous materials; thus, accident conditions from the release of hazardous materials would not occur. As such, operation of minor improvements and other distribution system improvements would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Operational impacts would be less than significant, and this issue will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

- 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?**

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Potentially Significant Impact. The Los Angeles Unified School District, which serves the City, operates over 1,000 schools. Under the Proposed Program, the construction of new distributing substations, expansions of existing substations, minor improvements, and other distribution system improvements may be located within one-quarter mile of an existing or proposed school. Therefore, the impact is considered potentially significant, and this issue will be further analyzed in the PEIR.

CONCLUSION: Impacts would be potentially significant for the Proposed Program. This issue will be further analyzed in the PEIR.

- 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?**

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Potentially Significant Impact. The LADWP in-basin service area encompasses numerous sites that may undergo the development of four new distributing substations, proposed expansions, minor improvements, and other distribution system improvements. The LADWP in-basin service area, including the study areas for the four new distributing substations, includes sites that are identified on the State Water Resources Control Board's (SWRCB) Geotracker database, lists of release/waste disposal sites as provided by the California Environmental Protection Agency, and the Department of Toxic Substances Control (DTSC) EnviroStor database.^{52,53,54,55} Therefore, projects under the Proposed Program would potentially be located on specific sites that are included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and as a result, have the potential to create a significant hazard to the public or the environment. This impact is considered potentially significant, and this issue will be further analyzed in the PEIR.

CONCLUSION: Impacts would be potentially significant for the Proposed Program. This issue will be further analyzed in the PEIR.

⁵² State Water Resources Control Board. GeoTracker. Available at: <https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=Search+GeoTracker>, accessed October 2025.

⁵³ California Environmental Protection Agency. Sites Identified with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit. Available at: <https://calepa.ca.gov/wp-content/uploads/2016/10/SiteCleanup-CorteseList-CurrentList.pdf>, accessed October 2025.

⁵⁴ California Environmental Protection Agency. Cortese List Data Resources. Available at: <https://calepa.ca.gov/SiteCleanup/CorteseList/>, accessed October 2025.

⁵⁵ California Department of Toxic Substances Control. EnviroStor Database. Available at: <https://www.envirostor.dtsc.ca.gov/public/>, accessed October 2025.

- 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?**

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Potentially Significant Impact. The City and greater Los Angeles area contain multiple airports that are located near the potential sites for the new distributing substations, existing substations, and other distribution system improvements, including but not limited to, Los Angeles International Airport, Whiteman Airport, Van Nuys Airport, Hollywood Burbank Airport, Santa Monica Airport, and Compton/Woodley Airport. Construction workers, maintenance staff, and other people residing or working in specific project sites may be exposed to safety hazards or excessive noise levels due to airports. The impact is potentially significant, and this issue will be further analyzed in the PEIR.

CONCLUSION: Impacts would be potentially significant for the Proposed Program. This issue will be further analyzed in the PEIR.

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

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Less Than Significant Impact. The City of Los Angeles Emergency Management Department coordinates evacuations in the case of emergency with the LAPD, LAFD, and the County of Los Angeles, as outlined in the City's Emergency Operations Plan.⁵⁶ The County of Los Angeles also designates disaster routes within the entire County. Under the Proposed Program, the construction of new distributing substations, expansions of existing substations, minor improvements, and other distribution system improvements would result in minor to extensive construction activities that would require site-specific traffic control plans. Such plans would be prepared for review and approval by the LADOT and would include measures such as signage, flag persons, and lane detours as necessary to minimize disruptions to traffic and maintain emergency access during construction activities. Disruptions would be temporary during construction and would cease upon the completion of the new distributing substations, expanded or improved substations, and distribution system improvements. Emergency access to specific project sites and their surrounding areas, particularly for emergency response vehicles, would be maintained at all times during construction. Specifically, during construction of other distribution system improvements that would require the installation of the subtransmission lines and/or feeders within the public right-of-way, construction activities would typically occur within an approximately 800- to 1,000-foot work area, within traffic lanes. As such, rolling partial lane closures would be required for installation of conduit. Traffic control plans would be prepared in coordination with LADOT to delineate traffic lanes around work areas and to modify any turn lane pockets affected by installation of lines at major intersections. No streets would be permanently closed as a result of other distribution system improvements

⁵⁶ City of Los Angeles, Emergency Management Department. *City of Los Angeles Base Emergency Operations Plan*. 2023. Available at: https://emergency.lacity.gov/sites/g/files/wph1791/files/2023-10/Emergency%20Operations%20Base%20Plan_2023.pdf.

and following installation of the proposed subtransmission lines and feeders, the roadways would be returned to their existing condition.

Furthermore, new distributing substations and expansions would be designed in accordance with LADOT requirements for emergency ingress/egress to ensure safety and visibility for roadway users. During operation, substations would be unmanned and remotely monitored via a SCADA system, while personnel visits for maintenance and system testing would occur occasionally. Therefore, the Proposed Program would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant, and this issue will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

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

In compliance with state law, LADWP prepares annual updates to its Wildfire Mitigation Plan, which identifies strategies to prevent, mitigate, and respond to wildfire risks associated with LADWP's electrical infrastructure.⁵⁷ As stated in the Wildfire Mitigation Plan, the potential for wildfire exists throughout California, including parts of the City. The terrain, climate, and vegetation present in Southern California can create wildland fire hazards in areas near or around LADWP facilities and other structures. LADWP's Wildfire Mitigation Plan includes an overview of the fire prevention design and construction features for electrical equipment and facilities, which either meet or exceed state, federal, and industry standards. These features include maintaining defensible space around facilities through vegetation management; using non-flammable pole materials, such as ductile iron, steel, and concrete; using larger conductors and fiberglass arms; increasing conductor spacing; replacing low voltage bare conductors with insulated conductors; and increasing pole loads to sustain higher wind pressure in high wind areas.⁵⁸ Additionally, all construction and maintenance activities are conducted with fire suppression equipment, and each substation prepares and maintains a site-specific emergency response plan, which includes fire safety and reporting protocols. When working in fire hazard zones, LADWP requires construction vehicles to carry a fire extinguisher and other fire suppression equipment, clearance of vegetation within a 10-foot radius of poles, and parking and idling of vehicles or equipment over dry brush is prohibited. Additionally, LADWP's Wildfire Mitigation Plan outlines further restrictions on activities during red flag days when wildfire risk is increased.

New Development

Potentially Significant Impact. Development of new distributing substations would occur within the four identified study areas, including the Sun Valley Study Area, Silver Lake Study Area, Southeast Study Area, and Wilmington Study Area. The approximately northeast quadrant of the Silver Lake Study Area and the area east of San Fernando Road in the Sun Valley Study Area are within Very High Fire Hazard Severity Zones; the Wilmington Study Area near the

⁵⁷ Los Angeles Department of Water and Power. *2025 Wildfire Mitigation Plan*. June 2025. Available at: <https://www.ladwp.com/sites/default/files/2025-07/LADWP%202025%20Wildfire%20Mitigation%20Plan.pdf>.

⁵⁸ Los Angeles Department of Water and Power. *2025 Wildfire Mitigation Plan*. June 2025. Available at: <https://www.ladwp.com/sites/default/files/2025-07/LADWP%202025%20Wildfire%20Mitigation%20Plan.pdf>.

Harbor Sports Park is near a High Fire Hazard Severity Zone.⁵⁹ New development would include the installation and maintenance of electrical equipment. LADWP identifies design and construction standards and operational protocols to reduce risk of wildfire. Nonetheless, construction and operation of new distributing substations could expose people or structures to a risk of loss, injury or death involving wildland fires. The impact is considered potentially significant and this issue related to new development will be further analyzed in the PEIR.

Expansions

Potentially Significant Impact. Expansions would involve expanding the footprint of an existing substation. The expansion proposed would depend on the size and configuration of the existing substation and design of the expansion. In some cases, an expansion may require acquisition of one or more adjacent properties. Expansions into parcels adjacent to existing substation properties would be generally similar to development of new stations. Existing substations close to the northern and northwestern edges of the City boundaries are located near Very High Fire Hazard Severity Zones in a State Responsibility Area, and approximately one-quarter of existing substations are located in or near (i.e., within 0.25 miles) areas designated as Very High Fire Hazard Severity Zones within a Local Responsibility Area. As such, expansions in these areas could be susceptible to wildfire. Similar to new development, expansions would be required to adhere to the design and construction standards and operational protocols in the LADWP Wildfire Mitigation Plan. Nonetheless, construction and operation of expanded substations could expose people or structures to a risk of loss, injury or death involving wildland fires. The impact is considered potentially significant and this issue related to expansions will be further analyzed in the PEIR.

Minor Improvements

Less Than Significant Impact. Minor improvements to existing substations could include upgrades to modernize and replace equipment, adding equipment at vacant positions, and improvements to substation security and protection. Such minor improvements would require minimal construction and/or ground disturbance and would occur within the boundaries of the existing property, and thus, would not exacerbate wildfire risks at existing substations. Minor improvements would be required to adhere to the design and construction standards and operational protocols in the LADWP Wildfire Mitigation Plan, which include maintaining defensible space around facilities through vegetation management; using non-flammable pole materials, such as ductile iron, steel, and concrete; using larger conductors and fiberglass arms; increasing conductor spacing; replacing low voltage bare conductors with insulated conductors; and increasing pole loads to sustain higher wind pressure in high wind areas. Additionally, during operation, minor improvements at existing substations would provide beneficial impacts as they would modernize equipment and add electrical equipment for grounding and fire protection, which would improve fire safety. With compliance with the latest LADWP Wildfire Mitigation Plan, minor improvements would not exacerbate wildfire risks that could expose project occupants to pollutant concentrations from a wildfire. The impact would be less than significant and this issue related to minor improvements at existing substations will not be further analyzed in the PEIR.

⁵⁹ California Department of Forestry and Fire Protection (CalFire). Fire Hazard Severity Zone Viewer. Available at: <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones>, accessed January 23, 2026.

Other Distribution System Improvements

Potentially Significant Impact. Other distribution system improvements could include, but not be limited to, upgrades to subtransmission lines and feeders, removal of existing pole-top transformer racks, deactivation of existing distributing substations, and other ancillary improvements. These improvements could occur within or near areas designated as Very High Fire Hazard Severity Zones. Implementation of improvements in these areas could increase risk of wildfire during high wind events, in hillside areas, and/or in areas containing dense vegetation. Other distribution system improvements would be required to adhere to the design and construction standards and operational protocols in the LADWP Wildfire Mitigation Plan. Nonetheless, construction of other distribution system improvements in Very High Fire Hazard Severity Zones could expose people or structures to a risk of loss, injury or death involving wildland fires. The impact is considered potentially significant and this issue related to other distribution system improvements will be further analyzed in the PEIR.

CONCLUSION: Impacts would be potentially significant for new development, expansions, and other distribution system improvements. This issue for new development, expansions, and other distribution system improvements will be further analyzed in the PEIR. Impacts related to minor improvements would be less than significant, and therefore, will not be further analyzed in the PEIR.

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?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Discussion

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

New Development and Expansions

Less Than Significant Impact. Under the Proposed Program, the development of new distributing substations would occur within the four identified study areas, including the Sun Valley Study Area, Silver Lake Study Area, Southeast Study Area, and Wilmington Study Area. In addition, expansions would involve expanding the footprint of an existing substation and may require acquisition of one or more adjacent properties. The expansion proposed would depend on the size and configuration of the existing substation and design of the expansion. During construction of new distributing substations and expansions, particularly during the site preparation, excavation, and grading phases, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into

municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges associated with the storage, handling, use, and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. As such, the construction of new distributing substations and expansions could impact surface or groundwater quality.

Each new distributing substation or expansion of a distributing substation would require an approximately 25,000-square-foot site. Expansion of a receiving substation may require up to an approximately 40,000-square-foot site. If construction activities associated with a specific project would disturb more than one-acre (i.e., 43,650 square feet), LADWP would be required to prepare and implement a Construction Stormwater General Permit (SWRCB Order No. 2022-0057-DWQ)(Construction General Permit). The Construction General Permit would include requirements for stormwater discharges, effluent levels, treatment systems, and dewatering, amongst others. Additionally, the Construction General Permit would require the preparation of a site-specific Storm Water Pollution Prevention Plan (SWPPP) which would identify the sources of sediment and other pollutants that affect the quality of stormwater discharges, describe and ensure the implementation of site-specific BMPs to reduce or eliminate sediment and other pollutants in stormwater and non-stormwater discharges, and convey a plan to restore erosion protection and site hydrology post-construction.

If construction activities would not disturb more than one-acre, LADWP would not be required to comply with the requirements of a Construction General Permit. However, construction grading activities would be subject to the requirements of the LADBS grading and building permits, which would require implementation of measures and standards, such as the preparation of an erosion control plan and site-specific BMPs, designed to limit potential impacts associated with erosion to acceptable levels. The City's grading permit regulations are required by LAMC Chapter IX, Article 1, Division 70, and stormwater pollution control measures are required by LAMC Chapter VI, Article 4.4. Specific projects would also implement Rule 403 dust control measures as required by the SCAQMD. In addition, as discussed in Section 3.9, Hazards and Hazardous Materials, the risk of foreseeable upset or accident conditions involving hazardous materials that could degrade surface or ground water quality would be minimized through the proper handling, documentation, and disposal of such materials and wastes in accordance with federal, state, and local laws and regulations. Therefore, with adherence to regulatory requirements, the construction of new distributing substations and expansions would not violate any surface water quality standards or waste discharge requirements. As such, impacts to surface water quality would be less than significant during construction of new distributing substations and expansions, and this issue will not be further analyzed in the PEIR.

As described in Section 3.7, Geology and Soils, as required by LADWP standard construction procedures, a site-specific geotechnical assessment for each new distributing substation and some expansions, depending on the design, would be prepared prior to construction. Site-specific geotechnical assessments would identify historic high groundwater levels for the site and identify whether an existing groundwater production well or public water supply well is located within the site. Depending on the groundwater levels of a site and the depth of construction, groundwater may be encountered during construction activities. If construction dewatering is required, dewatering activities would comply with the requirements of the Los Angeles Regional Water Quality Control Board's (RWQCB) Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2023-0429, General NPDES Permit No. CAG994004) (Groundwater Discharge Permit). The Groundwater Discharge Permit specifies prohibited discharges, limitations for receiving waters, monitoring, and reporting

requirements, and general compliance criteria for construction dewatering. If an existing groundwater production well or public water supply well is located within the site, compliance with existing state regulations would ensure that construction activities would not impact water quality. In addition, activities that could potentially affect groundwater quality could involve spills of hazardous materials. However, as previously mentioned, the risk of foreseeable upset or accident conditions involving hazardous materials would be minimized through the proper handling, documentation, and disposal of such materials and wastes in accordance with regulations. With adherence to regulatory requirements, including the preparation of a Groundwater Discharge Permit if required, construction activities for new distributing substations and expansions would not substantially degrade groundwater quality. As such, impacts to groundwater quality would be less than significant during construction of new distributing substations and expansions, and this issue will not be further analyzed in the PEIR.

During operation, depending on the existing conditions of specific sites, the development of a new distributing substation or expansion could result in an increased percentage of impervious surfaces, and thus, an increased amount of stormwater runoff from a site. However, these projects would be required to comply with Los Angeles County's Municipal Separate Storm Sewer Systems (MS4) permit. The MS4 permit contains requirements for discharges into the municipal storm system and meeting water quality standards, and provides requirements for construction sites, new development, and redevelopment. Standards for new development and redevelopment include compliance with the City's LID Ordinance (No. 188125) and stormwater pollution control measures (LAMC Chapter VI, Article 4.4) to treat, capture, and reduce the volume of stormwater flows to the maximum extent feasible. Depending on the amount of disturbance and impervious surfaces created by implementation of the new distributing substations and expansions, as part of the LADBS plan check process, specific projects would be required to undergo LID plan checks with City of Los Angeles Sanitation (LASAN), which would review specific project details such as hydrology calculations, BMP sizing documentation, and feasibility analyses. Additionally, the site-specific SWPPP would address post-construction site hydrology. With approval of such plans, surface runoff flows and percolation to groundwater from the sites of the new distributing substations and expansions into adjacent acquired property would not violate water quality standards or waste discharge requirements. Furthermore, the operation of new distributing substations and expansions would not involve groundwater extraction and injection activities. As such, impacts related to surface water and groundwater quality would be less than significant during operation of new distributing substations and expansions, and this issue will not be further analyzed in the PEIR.

Minor Improvements

Less Than Significant Impact. The Proposed Program would also involve minor improvements to existing substations, including upgrades to modernize and replace equipment, adding equipment to vacant positions, and improvements to substation security and protection. Such minor improvements would require minimal construction and/or ground-disturbance and would occur within the overall boundaries of the existing property. Occasionally, shallow trenching and modifications to existing foundations, walls, steel racks, conduit, and trenching systems may be required to accommodate the minor improvements. Substation security and upgrades may also include construction of perimeter walls and drainage features. During construction of such improvements, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust, if required, could contribute to pollutant loading in runoff. Pollutant discharges associated with the storage, handling, use, and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. As such, the

construction of minor improvements could impact surface or groundwater quality.

Minor improvements are not anticipated to exceed one acre within the site of an existing substation, and thus, the on-site construction activities would not be required to comply with the requirements of a Construction General Permit. For minor improvements that would require grading, such as the potential installation of a perimeter wall for security purposes, construction activities would occur in accordance with grading permit regulations (LAMC Chapter IX, Article 1, Division 70) and requirements for stormwater pollution control measures and BMPs (LAMC Chapter VI, Article 4.4). As previously described, a site-specific geotechnical assessment, if required such as for installation of a perimeter wall for security purposes, would determine potential dewatering needs during construction, and any dewatering would occur in accordance with requirements of the Los Angeles RWQCB's Groundwater Discharge Permit. The minor improvements would also comply with Rule 403 dust control measures as required by the SCAQMD, as applicable. In addition, the storage, use, and disposal of hazardous substances would occur in accordance with all applicable local, state, and federal environmental, health and safety laws, ordinances, and regulations, and would be similar to existing conditions. Therefore, impacts to surface and groundwater quality would be less than significant during construction of minor improvements, and this issue will not be further analyzed in the PEIR.

Implementation of minor improvements are not anticipated to increase the amount of impervious surface areas or result in a substantial change in runoff from impervious surfaces when compared to existing conditions. However, minor improvements that include modifications for drainage would be required to comply with the City's stormwater pollution control measures (LAMC Chapter VI, Article 4.4) to treat, capture, and reduce the volume of stormwater flows to the maximum extent feasible, and would provide beneficial impacts for water quality. As such, surface flows from sites that undergo minor improvements would not violate water quality standards or waste discharge requirements. In addition, minor improvements would not involve the deliberate extraction of groundwater. Therefore, impacts related to surface water and ground water quality would be less than significant during operation of minor improvements, and this issue will not be further analyzed in the PEIR.

Other Distribution System Improvements

Less Than Significant Impact. Other distribution system improvements could include, but not be limited to, upgrades to subtransmission lines and feeders, removal of existing pole-top transformer racks, deactivation of existing distributing substations, and other ancillary improvements. While the necessary construction activities for some improvements would be minor, upgrades to subtransmission lines and feeders would require more extensive ground disturbance and heavy equipment. Specifically, as described in Section 1, Project Description, with the construction of new distributing substations and expansion of existing substations, subtransmission lines and feeders would potentially need to be extended, the length of which would depend on the location of the new distributing substation or existing substation. Typical line extensions to provide an additional circuit to feed a new or expanded distributing substation may range from 500 feet to 10,000 feet. For receiving substations, line extensions can reach up to 16,000 feet. LADWP would install new subtransmission lines and feeders underground. The general process for open-trench construction consists of utility clearance, site preparation, excavation, shoring as necessary, cable installation, backfilling, and work site street restoration. The size of the trench and number of duct banks would be based on the number, size, and length of conduits that would be required. Construction would typically occur within an approximately 800- to 1,000-foot work area, within existing road rights-of-way or utility easements. Construction would progress along the alignment with the maximum length of open

trench being 500 feet in length at any one time.

During construction of such improvements, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges associated with the storage, handling, use, and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. As such, the construction of other distribution system improvements could impact surface water or groundwater quality. Depending on the size and scope of the specific distribution system improvements, the construction activities could be subject to the Construction General Permit as “Traditional Construction Activities” or “Linear Underground and Overhead Projects” pursuant to Section II of the permit. Such projects would require preparation and implementation of dust and erosion control measures and a SWPPP, which would include BMPs to prevent stormwater pollution during construction and require compliance with the permit’s inspections and reporting procedures. If a Construction General Permit does not apply due to the size of the specific distribution system improvement (i.e., less than one acre of disturbance), the improvement would be required to comply with stormwater pollution control measures, such as the preparation of an erosion control plan and site-specific BMPs, pursuant to LAMC Chapter VI, Article 4.4, and implement standard control measures required by LADWP contract specifications designed to limit potential impacts associated with erosion. Projects would also implement Rule 403 dust control measures as required by the SCAQMD, and hazardous materials would be stored, used, and disposed of in accordance with all applicable local, state, and federal environmental, health and safety laws, ordinances, and regulations. Therefore, in complying with applicable regulatory requirements, the construction of other distribution system improvements would not violate any surface water quality standards or waste discharge requirements. As such, impacts to surface water quality would be less than significant during construction of other distribution system improvements, and this issue will not be further analyzed in the PEIR.

Depending on the alignment, groundwater may be encountered during construction of subtransmission lines and feeders along areas of historic high groundwater levels. If groundwater is encountered during construction activities, construction dewatering would comply with the requirements of the Los Angeles RWQCB’s Groundwater Discharge Permit, which specifies prohibited discharges, limitations for receiving waters, monitoring, and reporting requirements, and general compliance criteria for construction dewatering. With compliance with the Groundwater Discharge Permit and regulatory requirements, construction activities for applicable projects would not substantially degrade groundwater quality. As such, temporary impacts to groundwater quality would be less than significant during construction of distribution system improvements, and this issue will not be further analyzed in the PEIR.

Following the installation of subtransmission lines and feeders, work site streets and roadways would be restored, paved, and restriped, and any disturbed surfaces within existing utility easements would be restored to pre-construction conditions, such that no substantial change in stormwater runoff would occur when compared to existing conditions. Following the removal of existing pole-top transformer racks, any dismantled concrete or paved areas would be restored. Therefore, water quality impacts during operation of other distribution system improvements would be less than significant, and this issue will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

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?

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Less Than Significant Impact. Under the Sustainable Groundwater Management Act of 2014, the State provides a framework for local agencies to form Groundwater Sustainability Agencies and develop Groundwater Sustainability Plans (GSPs) for high-and medium-priority groundwater basins in order to ensure long-term groundwater reliability, prevent overdraft, and protect water quality. LADWP's service area overlies portions of the Los Angeles Coastal Plain Groundwater Basin (including Santa Monica Subbasin, Hollywood Subbasin, West Coast Subbasin, and Central Subbasin), the San Fernando Groundwater Basin, and the San Gabriel Groundwater Basin.⁶⁰ GSPs are not required for the Hollywood Subbasin, northern portion of the Central Subbasin, San Fernando Groundwater Basin, and San Gabriel Groundwater Basin, which are low priority basins. The West Coast Subbasin and the majority of the Los Angeles Coastal Plain Groundwater Basin—Central Subbasin are adjudicated, do not require GSPs, and are managed by the Water Replenishment District of Southern California. While a large area of LADWP's service area overlies basins that are exempt from establishing GSPs, a portion of the West LA service area overlies the Santa Monica Subbasin, which requires a GSP. No study areas for new distributing substations are located within the Santa Monica Basin GSP area. Existing substations in this area include DS-20, DS-28, DS-29, DS-44, DS-46, DS-59, DS-66, DS-76, DS-95, DS-135, DS-145, and RS-K. Other distribution system improvements may also be located within the Santa Monica Basin GSP area.

Project construction would require water for dust control during excavation, grading, and other activities. Water for these activities is anticipated to be supplied from existing water connections and not from groundwater supplies and is not expected to be a substantial amount. As detailed in Section 3.10(a), depending on the groundwater levels of the site for new development and expansions into an adjacent acquired property, and subtransmission lines and feeder alignments, groundwater may be encountered during construction activities. If construction dewatering is required, dewatering activities would comply with the requirements of the Los Angeles Regional RWQCB's Groundwater Discharge Permit. The Groundwater Discharge Permit specifies prohibited discharges, limitations for receiving waters, monitoring, and reporting requirements, and general compliance criteria for construction dewatering. If an existing groundwater production well or public water supply well is located within a site for a new distributing substation or expansion of an existing substation into an adjacent acquire property, compliance with existing state regulations would ensure that construction activities would not impact groundwater supplies. Furthermore, operation of the Proposed Program would not involve groundwater extraction and injection activities, or generate substantial water demand that would affect groundwater supplies or recharge. Any increase in impervious surfaces from development of a new distributing substation or expanded or improved substation would be nominal when compared to the groundwater basin area that underlies the development.

Additionally, no study areas for new distributing substations are located within the Santa Monica Basin GSP area. Thus, development of a new distributing substation would not substantially

⁶⁰ California Department of Water Resources. GSA Map Viewer. Available at: <https://sgma.water.ca.gov/webgis/index.jsp?appid=gasmaster&rz=true>, accessed March 20, 2026.

decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Expansions or improvements of existing substations within the Santa Monica Basin GSP area would not conflict with any of the management actions of the GSP, and thus, would not impede sustainable groundwater management of the basin. Therefore, the Proposed Program would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Proposed Program would impede sustainable groundwater management of the basin. Impacts during would be less than significant, and this issue will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

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?

New Development and Expansions

Less Than Significant Impact. Development of new distributing substations and expansions would not cross streams or rivers. However, as detailed in Section 3.10(a), new distributing substations and expansions would require moderate to extensive ground-disturbing construction activities. During construction of new distributing substations and expansions, particularly during the site preparation, excavation, and grading phases, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff.

Each new distributing substation or expansion of a distributing substation would require an approximately 25,000-square-foot site. Expansion of a receiving substation may require up to an approximately 40,000-square-foot site. If construction activities associated with a specific project would disturb more than one-acre (i.e., 43,650 square feet), LADWP would be required to prepare and implement a Construction General Permit, which would include requirements for stormwater discharges, effluent levels, treatment systems, and dewatering, amongst others. Additionally, the Construction General Permit would require the preparation of a site-specific SWPPP which would identify the sources of sediment and other pollutants that affect the quality of stormwater discharges, describe and ensure the implementation of site-specific BMPs to reduce or eliminate sediment and other pollutants in stormwater and non-stormwater discharges, and convey a plan to restore erosion protection and site hydrology post-construction.

If construction activities would not disturb more than one-acre, LADWP would not be required to comply with the requirements of a Construction General Permit. However, construction's grading activities would be subject to the requirements of the LADBS grading and building permits, which would require implementation of measures and standards, such as the preparation of an erosion control plan and site-specific BMPs, designed to limit potential impacts associated with sedimentation and erosion to acceptable levels. Therefore, in complying with regulatory requirements, the construction of new distributing substations and expansions would

not alter the existing drainage pattern of the site or area in a manner that would result in substantial erosion or siltation on- or off-site. As such, impacts associated with erosion and siltation would be less than significant during construction of new distributing substations and expansions, and this issue will not be further analyzed in the PEIR.

During operation, depending on existing conditions of specific sites, the development of a new distributing substation or expansion could result in increased impervious surfaces. These projects would be required to comply with the County's MS4 permit and City's stormwater pollution control measures (LAMC Chapter VI, Article 4.4) to treat, capture, and reduce the volume of stormwater flows to the maximum extent feasible. Depending on the amount of disturbance and impervious surfaces created by implementation of the specific project, the project may be required to comply with the City's LID Ordinance (No. 188125), and undergo LID plan checks with LASAN, which would review specific project details such as hydrology calculations, BMP sizing documentation, and feasibility analyses. Additionally, the site-specific SWPPP would address post-construction site hydrology. Therefore, with approval of such plans, once operational, the new distributing substations and expansions would not alter the existing drainage pattern of the respective sites or areas in a manner that would result in substantial erosion or siltation on- or off-site. As such, impacts associated with erosion and siltation would be less than significant during operation of new distributing substations and expansions, and this issue will not be further analyzed in the PEIR.

Minor Improvements

Less Than Significant Impact. Under the Proposed Program, minor improvements to existing substations could include upgrades to modernize and replace equipment, adding equipment to vacant positions, and improvements to substation security and protection. Such minor improvements would require minimal construction and/or ground-disturbance and would occur within the overall boundaries of the existing property. Occasionally, shallow trenching and modifications to existing foundations, walls, steel racks, conduit, and trenching systems may be required to accommodate the minor improvements. Substation security upgrades may also include construction of perimeter walls and drainage features. During construction of such improvements, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems.

Minor improvements are not anticipated to exceed one acre within the site of an existing substation, and thus, the on-site construction activities would not be required to comply with the requirements of the Construction General Permit. For minor improvements that would require grading, such as the potential installation of a perimeter wall for security purposes, construction activities would occur in accordance with grading permit regulations (LAMC Chapter IX, Article 1, Division 70) and requirements for stormwater pollution control measures and BMPs (LAMC Chapter VI, Article 4.4). The minor improvements would also comply with Rule 403 dust control measures as required by the SCAQMD, as applicable. Therefore, with adherence to regulatory requirements, the construction of minor improvements would not alter the existing drainage pattern of the respective sites in a manner that would result in substantial erosion or siltation on- or off-site. As such, impacts associated with erosion and siltation would be less than significant during construction of minor improvements, and this issue will not be further analyzed in the PEIR.

Implementation of minor improvements are not anticipated to increase the amount of impervious surface areas or result in a substantial change in runoff from impervious surfaces when compared to existing conditions. However, minor improvements that include modifications for

drainage would be required to comply with the City's stormwater pollution control measures (LAMC Chapter VI, Article 4.4) to treat, capture, and reduce the volume of stormwater flows to the maximum extent feasible. Therefore, once operational, the minor improvements would not alter the existing drainage pattern of the respective sites or areas in a manner that would result in substantial erosion or siltation on- or off-site. As such, impacts associated with erosion and siltation would be less than significant during operation of minor improvements, and this issue will not be further analyzed in the PEIR.

Other Distribution System Improvements

Less Than Significant Impact. Other distribution system improvements could include, but not be limited to, upgrades to subtransmission lines and feeders, removal of existing pole-top transformer racks, deactivation of existing distributing substations, and other ancillary improvements. While the necessary construction activities for some improvements would be minor, upgrades to subtransmission lines and feeders would require more extensive ground disturbance and heavy equipment. As discussed in Section 3.10(a), during construction of such improvements, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. Depending on size and scope of the specific distribution system improvements, the construction activities could be subject to the Construction General Permit as "Traditional Construction Activities" or "Linear Underground and Overhead Projects" pursuant to Section II of the permit. Such projects would require preparation and implementation of dust and erosion control measures and a SWPPP, which would include BMPs to prevent stormwater pollution during construction and require compliance with the permit's inspections and reporting procedures. If a Construction General Permit does not apply due to the size of the specific distribution system improvement project (i.e., less than one acre of disturbance), the improvement would be required to comply with stormwater pollution control measures, such as the preparation of an erosion control plan and site-specific BMPs, pursuant to LAMC Chapter VI, Article 4.4, and implement standard control measures required by LADWP contract specifications designed to reduce the effects of sedimentation and erosion. Projects would also implement Rule 403 dust control measures as required by the SCAQMD. Therefore, with adherence to applicable regulatory requirements, the construction of other distribution system improvements would not alter the existing drainage pattern of the site or area in a manner that would result in substantial erosion or siltation on- or off-site. As such, impacts associated with erosion and siltation would be less than significant during construction of other distribution system improvements, and this issue will not be further analyzed in the PEIR.

Following the installation of subtransmission lines and feeders, work site streets and roadways would be restored, paved, and restriped, and any disturbed surfaces within existing utility easements would be restored to pre-construction conditions, such that no substantial change in drainage would occur when compared to existing conditions. Following the removal of existing pole-top transformer racks, any dismantled concrete or paved areas would be restored. Thus, once operational, the other distribution system improvements would not alter the existing drainage pattern of the respective sites or areas in a manner that would result in substantial erosion or siltation on- or off-site. As such, impacts associated with erosion and siltation would be less than significant during operation of other distribution system improvements, and this issue will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

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

New Development and Expansions

Less Than Significant Impact. Under the Proposed Program, the development of new distributing substations would occur within the four identified study areas, including the Sun Valley Study Area, Silver Lake Study Area, Southeast Study Area, and Wilmington Study Area. In addition, expansions would involve expanding the footprint of an existing substation and may require acquisition of one or more adjacent properties. The expansion proposed would depend on the size and configuration of the existing substation and design of the expansion.

According to the Federal Emergency Management Agency (FEMA), portions of the four study areas include areas designated as Special Flood Hazard Area (with a 1 percent annual chance flood; a 100-year flood), moderate flood hazard areas (with a 0.2 percent annual chance of flood; a 500-year flood), and areas of minimal flood hazards (outside a 0.2 percent annual chance of floodplain).^{61,62,63} Existing substations are in areas of varying FEMA-designated flood hazard designations.⁶⁴ However, developments within flood hazard area zones would be subject to the City's Flood Hazard Management Ordinance 186952, which establishes the City's plan for management of flood hazards, implements FEMA National Flood Insurance Program requirements, and sets local standards for development within designated special flood hazard areas. Specific projects would be required to comply with structural and hydrological criteria to reduce flood risk and undergo proper City regulatory clearance.⁶⁵ In addition, depending on the existing conditions of specific sites, the development of a new distributing substation or expansion could result in an increased percentage of impervious surfaces, and thus, an increased amount of stormwater runoff from a site. As detailed in Section 3.10(a), these projects would be required to comply with the County's MS4 permit and City's stormwater pollution control measures (LAMC Chapter VI, Article 4.4) to treat, capture, and reduce the volume of stormwater flows to the maximum extent feasible. Depending on the amount of disturbance and impervious surfaces created by implementation of the new distributing substations and expansions, as part of the LADBS plan check process, specific projects would be required to undergo LID plan checks with LASAN, which would review specific project details such as hydrology calculations, BMP sizing documentation, and feasibility analyses. Additionally, the site-specific SWPPP would address post-construction site hydrology. With approval of applicable plans and regulatory clearance, the new distributing substations and expansions would not alter the existing drainage pattern of the respective sites or areas in a manner that would result in flooding on- or off-site. Additionally, new development and expansions would not

⁶¹ Federal Emergency Management Agency (FEMA). National Flood Insurance Program. Flood Insurance Rate Map. Effective September 26, 2008. Map Numbers 06037C1310F, 06037C1069F, 06037C1610F, and 06037C1805F.

⁶² Federal Emergency Management Agency (FEMA). National Flood Insurance Program. Flood Insurance Rate Map. Effective December 21, 2018. Map Numbers 06037C1619G, 06037C1638G, 06037C1785G, 06037C1619G, 06037C1638G, and 06037C1805F.

⁶³ Federal Emergency Management Agency (FEMA). National Flood Insurance Program. Flood Insurance Rate Map. Effective April 21, 2021. Map Number 06037C1941G and 06037C1942G.

⁶⁴ Federal Emergency Management Agency (FEMA). National Flood Hazard Layer (NFHL) Viewer. Available at: <https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd>, accessed March 18, 2026.

⁶⁵ Los Angeles Department of Building and Safety. Information Bulletin/Public – Building Code. Flood Hazard Management Ordinance. Reference No.: L.A. Ordinance 186952. Document No.: P/BC 2026-064. Effective/Revised January 1, 2026.

increase flood risks or worsen existing flood hazard conditions. As such, impacts associated with flooding on- or off-site would be less than significant for new distributing substations and expansions, and this issue will not be further analyzed in the PEIR.

Minor Improvements

Less Than Significant Impact. The Proposed Program would also involve minor improvements to existing substations, including upgrades to modernize and replace equipment, adding equipment to vacant positions, and improvements to substation security and protection, which may also include construction of perimeter walls and drainage features. As discussed in Section 3.10(a), implementation of minor improvements are not anticipated to increase the amount of impervious surface areas or result in a substantial change in runoff from impervious surfaces when compared to existing conditions. Minor improvements that include modifications for drainage would be required to comply with the City's stormwater pollution control measures (LAMC Chapter VI, Article 4.4) to treat, capture, and reduce the volume of stormwater flows to the maximum extent feasible. As such, minor improvements would not alter the existing drainage pattern of the site or area in a manner that would result in flooding on- or off-site. Minor improvement projects would not increase flood risks or worsen existing flood hazard conditions. Therefore, impacts associated with flooding on- or off-site would be less than significant for minor improvements, and this issue will not be further analyzed in the PEIR.

Other Distribution System Improvements

Less Than Significant Impact. Other distribution system improvements, which would be located in areas of varying FEMA flood hazard designations, could include, but not be limited to, upgrades to subtransmission lines and feeders, removal of existing pole-top transformer racks, deactivation of existing distributing substations, and other ancillary improvements.⁶⁶ As discussed in Section 3.10(a), following the installation of subtransmission lines and feeders, work site streets and roadways would be restored, paved, and restriped, and any disturbed surfaces within existing utility easements would be restored to pre-construction conditions. Following the removal of existing pole-top transformer racks, any dismantled concrete or paved areas would be restored. Thus, implementation of other distribution system improvements are not anticipated to increase the amount of impervious surface areas or result in a substantial change in runoff from impervious surfaces when compared to existing conditions. As such, other distribution system improvements would not increase flood risks or worsen existing flood hazard conditions. Therefore, impacts associated with flooding on- or off-site would be less than significant for other distribution system improvements, and this issue will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

⁶⁶ Federal Emergency Management Agency (FEMA). National Flood Hazard Layer (NFHL) Viewer. Available at: <https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd>, accessed March 18, 2026.

- 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?**

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Less Than Significant Impact. As discussed in Sections 3.10a, Sections 3.10(c)(i), and 3.10(c)(ii) above, the intensity of construction activities would depend on the specific scope of the new development, expansion, or improvement project. For projects requiring ground-disturbing activities, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges associated with the storage, handling, use, and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. However, construction activities would comply with state and local stormwater management requirements (e.g., Construction General Permit, LAMC, Groundwater Discharge Permit, MS4 permit) as applicable to the specific scope of the new development, expansion, or improvement project. In addition, as detailed in Section 3.9, all hazardous substances would be stored, used, and disposed in accordance with all applicable local, state, and federal environmental, health and safety laws, ordinances, and regulations. Therefore, construction-related impacts would be less than significant related to substantial additional sources of polluted runoff.

As detailed in Section 3.10(a), operation of specific projects under the Proposed Program is not anticipated to violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. As detailed in Sections 3.10(c)(i) and 3.10(c)(ii), the development of a new distributing substation or expansion could result in an increased percentage of impervious surfaces. However, specific projects under the Proposed Program would not substantially alter the existing drainage patterns of project sites in a manner which would result in substantial erosion or siltation or generate runoff that would result in flooding on- or off-site with compliance to existing regulatory and permitting measures. Therefore, new development, expansions, minor improvements, and other distribution system improvements would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems, or provide substantial additional sources of polluted runoff. Impacts would be less than significant, and this issue will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

- iv. **Impede or redirect flood flows?**

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Less Than Significant Impact. As detailed in Section 3.10(c)(ii), the LADWP service area

includes areas of varying FEMA flood hazard designations.⁶⁷ Therefore, new development, expansions, minor improvements, and other distribution system improvements would be subject to flood hazards, and development of specific projects may impede or redirect flood flows. However, developments within flood hazard area zones would be subject to the City's Flood Hazard Management Ordinance 186952, which establishes the City's plan for management of flood hazards, implements FEMA National Flood Insurance Program requirements, and sets local standards for development within designated special flood hazard areas. Specific projects would be required to comply with structural and hydrological criteria to reduce flood risk and undergo proper City regulatory clearance.⁶⁸ In addition, construction activities would comply with state and local stormwater management requirements (e.g., SWPPPs, LID plans and BMPs, hydrology analyses) as applicable to the specific scope of the development, expansion, or improvement project. Projects would be required to comply with the County's MS4 permit, City's LID Ordinance (No. 188125), as applicable, and stormwater pollution control measures (LAMC Chapter VI, Article 4.4) to treat, capture, and reduce the volume of stormwater flows to the maximum extent feasible. Depending on the amount of disturbance and impervious surfaces created by implementation of the new distributing substations and expansions, as part of the LADBS plan check process, specific projects would also be required to undergo LID plan checks with LASAN, which would review specific project details such as hydrology calculations, BMP sizing documentation, and feasibility analyses. Implementation of minor improvements and other distribution system improvements are not anticipated to increase the amount of impervious surface areas or result in a substantial change in runoff from impervious surfaces when compared to existing conditions. With approval of applicable plans and regulatory clearance, the projects under the Proposed Program would not substantially alter the existing drainage pattern of the specific sites or areas in a manner which would impede or redirect flood flows. Therefore, impacts would be less than significant, and this issue will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

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

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Less Than Significant Impact. As discussed in Sections 3.10(c)(ii) and 3.10(c)(iv), the LADWP service area includes areas of varying FEMA flood hazard designations.⁶⁹ However, developments within flood hazard area zones would be subject to the City's Flood Hazard

⁶⁷ Federal Emergency Management Agency (FEMA). National Flood Hazard Layer (NFHL) Viewer. Available at: <https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd>, accessed March 18, 2026.

⁶⁸ Los Angeles Department of Building and Safety. Information Bulletin/Public – Building Code. Flood Hazard Management Ordinance. Reference No.: L.A. Ordinance 186952. Document No.: P/BC 2026-064. Effective/Revised January 1, 2026.

⁶⁹ Federal Emergency Management Agency (FEMA). National Flood Hazard Layer (NFHL) Viewer. Available at: <https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd>, accessed March 18, 2026.

Management Ordinance 186952, which establishes the City's plan for management of flood hazards in accordance with FEMA requirements and sets local standards for development within designated special flood hazard areas. Applicable developments would be required to comply with structural and hydrological criteria to reduce flood risk and undergo proper City regulatory clearance.⁷⁰ In addition, construction activities would comply with state and local stormwater management requirements (e.g., SWPPPs, LID plans and BMPs, hydrology analyses) as applicable to the specific scope of the development, expansion, or improvement project. Projects would be required to comply with the County's MS4 permit, City's LID Ordinance (No. 188125), as applicable, and stormwater pollution control measures (LAMC Chapter VI, Article 4.4) to treat, capture, and reduce the volume of stormwater flows to the maximum extent feasible. As part of the LADBS plan check process, applicable projects would also be required to undergo LID plan checks with LASAN, which would review specific project details such as hydrology calculations, BMP sizing documentation, and feasibility analyses. As detailed in Section 3.9, the storage, use, and disposal of routine and identified hazardous substances during construction would occur in accordance with all applicable local, state, and federal environmental, health and safety laws, ordinances, and regulations. During operation, the Proposed Program would predominantly involve unmanned facilities that would be remotely monitored via a SCADA system with occasional personnel visits to conduct maintenance and system testing. Any use of hazardous materials associated with operation of substations and associated components would be routine and conducted in compliance with applicable regulations. With approval of applicable plans and adherence to regulatory requirements, specific projects located in special flood hazard areas within the LADWP service area would not risk release of pollutants due to project inundation.

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. Existing substations and other components of the distribution system are predominately located inland from the Pacific Ocean. None of the four study for new distributing substations are located within tsunami inundation zones. Due to the intervening distance, inland areas would not be anticipated to be affected by tsunamis. However, portions of LADWP's service area along the coast are located within tsunami inundation zones, as mapped by the City of Los Angeles and California Geological Survey.^{71,72} Existing substations DS-3, DS-119, DS-121, and RS-Q are located within tsunami inundation zones. If expansions, minor improvements, and other distribution system improvements are implemented within the inundation zones, such projects would be developed in accordance with local and coastal regulations associated with geotechnical and hydrological requirements, such as those associated with drainage and flooding. Project construction would also comply with regulatory requirements associated with pollution control from runoff, erosion, stormwater management, and hazardous materials, as applicable to the specific scope of the expansion or improvement project. Any use of hazardous materials associated with operation of substations and associated components would be similar to existing uses at the existing substations, and would be routine and conducted in compliance with applicable regulations. Therefore, the impacts of

⁷⁰ Los Angeles Department of Building and Safety. Information Bulletin/Public – Building Code. Flood Hazard Management Ordinance. Reference No.: L.A. Ordinance 186952. Document No.: P/BC 2026-064. Effective/Revised January 1, 2026.

⁷¹ City of Los Angeles. *Emergency Operations Plan: Tsunami Hazard Specific Annex*. June 2018. Available at: https://emergency.lacity.gov/sites/g/files/wph1791/files/2025-07/Tsunami%20Annex_LA%20City_2018%2BEvac%20Maps.pdf.

⁷² California Department of Conservation, California Geological Survey. Tsunami Hazard Area Map. Available at: https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/, accessed March 20, 2026.

implementation of expansions, minor improvements, and other distribution system improvements within tsunami inundation zones would not result in substantial risk of pollutant release due to inundation.

Seiches are oscillations generated in partially or fully enclosed bodies of water, usually as a result of earthquake related ground shaking or tsunamis. Seiches are typically observed on bodies of water such as lakes and reservoirs. Within the Los Angeles basin, LADWP operates ten major active reservoirs and over 106 smaller reservoirs and tanks. LADWP is also responsible for conducting retrofits or replacements according to structural and mechanical elements, materials, and safety seismic stability.⁷³ To prepare for potential seiche incidents, LADWP regulates water levels in its storage facilities and provides walls of extra height to contain seiches and prevent overflow. Dams and reservoirs are monitored during storms and measures are instituted in the event of potential overflow.⁷⁴ In addition, the U.S. Army Corps of Engineers—Los Angeles District, Los Angeles County Department of Public Works, and several cities also operate dams that have potential inundation areas overlapping with LADWP's service area.⁷⁵

The Hansen Dam is located in the vicinity of the Sun Valley Study Area. However, the Hansen Dam has a flood control basin which would prevent overflow of the dam into developed areas in event of seiche. The central portion of the Silver Lake Study is within the inundation boundary of the Silver Lake Reservoir. However, LADWP maintains Silver Lake Reservoir's water levels several feet below the overflow elevation and maintains the reservoir and dam in compliance with the regulatory requirements of California Department of Water Resources' Division of Safety of Dams. Furthermore, the natural bioremediation processes at Silver Lake Reservoir filter out contaminants in water prior to potential discharge. The South LA and Wilmington study areas are not within inundation zones. Existing substations located within inundation zones would not substantially change the risk release of pollutants due to project inundation as the types of hazards and hazardous materials used for the expanded portion of the substation would be similar to those used for the existing substation.

To reduce risks of seiches, agencies and cities continue to operate and maintain dam facilities in accordance with the regulatory requirements set by the California Department of Water Resources' Division of Safety of Dams and U.S. Army Corps of Engineers. As such, the Proposed Program, including areas within seiche inundation zones, would not result in substantial risk of pollutant release due to inundation. Therefore, impacts related to inundation zones and risk of pollutants release would be less than significant for the Proposed Program, and this issue will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

⁷³ Los Angeles Department of Water and Power. *2024-2025 Water Infrastructure Plan*. Available at: https://www.ladwp.com/sites/default/files/2025-01/2024_BOOKLETS_WIP_Digital%20Final.pdf.

⁷⁴ Los Angeles Department of Water and Power. *2024-2025 Water Infrastructure Plan*. Available at: https://www.ladwp.com/sites/default/files/2025-01/2024_BOOKLETS_WIP_Digital%20Final.pdf.

⁷⁵ California Department of Water Resources, Division of Safety of Dams. California Dam Breach Inundation Maps. Available at: https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2, accessed March 20, 2026.

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

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Less Than Significant Impact. The Los Angeles RWQCB administers the *Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (Basin Plan) to preserve and enhance water quality and protect the beneficial uses of all regional waters. As described above in Section 3.10(a), the construction activities under the Proposed Program would be required to comply with state and local stormwater quality and management requirements and permit approval processes (e.g., Construction General Permit, LAMC, Groundwater Discharge Permit, MS4 permit), as applicable to the specific scope of the new development, expansion, or improvement project. Compliance would ensure that discharges of pollutants are effectively prohibited and would not cause or contribute to an exceedance of water quality standards during construction or operation. In addition, hazardous substances required during construction and operation would be stored, used, and disposed of in accordance with all applicable regulations, minimizing the potential for water quality impacts. Accordingly, the projects under the Proposed Program would not conflict with or obstruct implementation of the Basin Plan.

As described in Section 3.10(b), LADWP's service area overlies portions of the Los Angeles Coastal Plain Groundwater Basin (including Santa Monica Subbasin, Hollywood Subbasin, West Coast Subbasin, and Central Subbasin), the San Fernando Groundwater Basin, and the San Gabriel Groundwater Basin.⁷⁶ GSPs are not required for the Hollywood Subbasin, northern portion of the Central Subbasin, San Fernando Groundwater Basin, and San Gabriel Groundwater Basin, which are low priority basins. The West Coast Subbasin and a majority of the Los Angeles Coastal Plain Groundwater Basin—Central Subbasin are adjudicated, do not require GSPs, and are managed by the Water Replenishment District of Southern California. While a large area of LADWP's service area overlies basins that are exempt from establishing GSPs, a portion of the service area overlies the Santa Monica Subbasin, which requires a GSP. No study areas for new distributing substations are located within the Santa Monica Basin GSP area. Existing substations in this area include DS-20, DS-28, DS-29, DS-44, DS-46, DS-59, DS-66, DS-76, DS-95, DS-135, DS-145, and RS-K. Other distribution system improvements may also be located within the San Monica Basin GSP area. Construction activities under the Proposed Program would be required to comply with the requirements of the Los Angeles Regional RWQCB's Groundwater Discharge Permit, as well as existing state regulations governing groundwater production wells or public water supply wells, as applicable, to the specific scope of the new development, expansion, or improvement project.

Operation of the Proposed Program would not involve groundwater extraction and injection activities, or generate substantial water demand that would affect groundwater supplies or recharge. Any increase in impervious surfaces from development of a new distributing substation or expanded or improved substation would be nominal when compared to the groundwater basin area that underlies the development. Additionally, no study areas for new distributing substations are located within the Santa Monica Basin GSP area. Thus, development of a new distributing substation would not substantially decrease groundwater

⁷⁶ California Department of Water Resources. GSA Map Viewer. Available at: <https://sgma.water.ca.gov/webgis/index.jsp?appid=gasmaster&rz=true>, accessed March 20, 2026.

supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Expansions or improvements of existing substations within the Santa Monica Basin GSP area would not conflict with any of the management actions of the GSP, and thus, would not impede sustainable groundwater management of the basin.

Lastly, independent of the Proposed Program, LADWP would continue to monitor, remediate, and replenish groundwater and implement various programs to restore the beneficial use of basins.⁷⁷ LADWP would also continue to collaborate and coordinate with agencies at the local, regional, and State levels, such as Los Angeles County Flood Control District, Los Angeles County Sanitation Districts, City of Los Angeles Department of Public Works, Metropolitan Water District, Water Replenishment District of Southern California, and other water districts as part of ongoing and completed local and regional integrated resources planning efforts. Therefore, the Proposed Program would not conflict with or obstruct implementation of a sustainable groundwater management plan. Impacts would be less than significant, and this issue will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

⁷⁷ Los Angeles Department of Water and Power. *2025 Urban Water Management Plan*. February 2026. Available at: https://www.ladwp.com/sites/default/files/2026-06/LADWP%202025%20Urban%20Water%20Management%20Plan_Final.pdf.

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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Discussion

a) Would the project physically divide an established community?

New Development

Less Than Significant Impact. Development of new distributing substations would occur within the four identified study areas including the Sun Valley Study Area, Silver Lake Study Area, Southeast Study Area, and Wilmington Study Area. New distributing substations would be developed within existing single or adjoining parcels and would not span across or block existing roadways. Site-specific traffic control plans would be prepared for review and approval by LADOT prior to construction of each distributing substation and would include such measures as warning signage, speed limits, detours, and flag persons as necessary to minimize disruptions to traffic. While temporary lane closures may be required during construction of new distributing substations, no streets would be permanently closed as a result of the new distributing substations. Following completion of construction, all travel lanes, bicycle lanes, and sidewalks would be reopened.

The siting of new distributing substations within the four study areas may create an intermittent separation of land use types if the chosen parcel or parcels are located within a strip of contiguous land use types (e.g., all residential or all commercial). However, this would be similar to existing substations across the City, which are located within existing communities and surrounded by various land use types, including residential, commercial, open space, public facilities, industrial, and other uses. Additionally, a new distributing substation would require one or more parcels but would not isolate an entire neighborhood or community. The exterior walls of the new distributing substations would be designed to be compatible with the character of surrounding uses and visually shield interior equipment at the street level. Furthermore, existing local roadways and bicycle and pedestrian facilities would continue to provide circulation and access within and between neighborhoods and communities. As such, new development would not physically divide an established community. Impacts would be less than significant, and this issue related to new development will not be further analyzed in the PEIR.

Expansions

Less Than Significant Impact. Expansions would involve expanding the footprint of an existing substation. The expansion proposed would depend on the size and configuration of the existing substation and design of the expansion. In some cases, an expansion may require acquisition of one or more adjacent properties. Expansions into adjacent parcels would generally be similar to development of new substations. Expansions would not span across or block existing roadways.

During construction, expansions may require temporary lane closures for which traffic control plans would be prepared for review and approval by LADOT prior to construction. No streets would be permanently closed as a result of expansions. Following completion of construction, all travel lanes, bicycle lanes, and sidewalks would be reopened.

While expansions could require one or more parcels adjacent to an existing substation property, expansions would not be of a scale that would isolate an entire neighborhood or community. The exterior walls of the expanded substations would be designed to be compatible with the walls of the existing substation. Furthermore, existing local roadways and bicycle and pedestrian facilities would continue to provide circulation and access within and between neighborhoods communities. As such, expansions would not physically divide an established community. Impacts would be less than significant, and this issue related to expansions will not be further analyzed in the PEIR.

Minor Improvements

No Impact. Minor improvements at existing substations would be limited to the existing station property. As such, these improvements would not extend to neighboring parcels or road rights-of-way. While minor improvements may include substation physical protection and security upgrades, such as perimeter walls, these walls would be located within the substation property, which are already closed to the public, and would not result in any new physical barriers that would divide a community. Therefore, minor improvements at existing substations would not physically divide an established community, and no impact would occur. This issue related to minor improvements at existing substations will not be further analyzed in the PEIR.

Other Distribution System Improvements

Less Than Significant Impact. Other distribution system improvements could include, but not be limited to, upgrades to subtransmission lines and feeders, removal of existing pole-top transformer racks, deactivation of existing distributing substations, and other ancillary improvements. New or expanded subtransmission lines and feeders would be installed underground along existing road rights-of-way or utility easements. During construction in existing road rights-of-way, installation of the subtransmission lines and/or feeders would typically occur within an approximately 800- to 1,000-foot work area, within traffic lanes. As such, rolling partial lane closures would be required for installation of conduit. Traffic control plans would be prepared in coordination with LADOT to delineate traffic lanes around work areas and to modify any turn lane pockets affected by installation of lines at major intersections. Any residences or businesses near the subtransmission lines and feeder alignments would be notified prior to the start of construction (e.g., via flyers) of lane closures and parking restrictions in their vicinity. The notices would include a telephone number for comments or questions related to construction activities. No streets would be permanently closed as a result of other distribution system improvements, and no permanent separation of uses or disruption of access between land use types would occur. Following installation of the proposed subtransmission lines and feeders, the roadways would be returned to their existing condition. Installation of the subtransmission lines and/or feeders in existing utility easements would not result in the permanent separation of uses or disruption of access between land use types as any disturbed surfaces would be restored to pre-construction conditions. As such, the other distribution system improvements would not physically divide an established community, and impacts would be less than significant. This issue related to other distribution system improvements will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development, expansions, and other distribution system improvements. No impact would occur related to minor improvements. This issue will not be further analyzed in the PEIR.

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?

Development within the City is guided by the Land Use Element of the City's General Plan, which identifies broad land use categories, or designations. The Land Use Element comprises 34 Community Plans that cover the entire City. While the General Plan Land Use Designations identify groupings of compatible land use types, the City's Zoning Code identifies permitted uses and provides specific development standards at the parcel level.

The City is in the process of rezoning and, until the new zoning code is implemented across the City, two zoning codes are in effect, including the original Zoning Code contained in Chapter 1 of the LAMC and the new Zoning Code contained in Chapter 1A of the LAMC. Both the original Zoning Code and the new Zoning Code exempt the construction, installation, operation, and maintenance of certain public utilities, including electric power transmission and distribution lines, from zoning requirements and limitations.⁷⁸ The new Zoning Code is currently only in effect within the Downtown Community Plan Area but will become effective as other Community Plans are updated.

Under the original Zoning Code, installation of public utilities infrastructure is generally allowed in any zone throughout the City, although a Conditional Use or similar quasi-jurisdictional permit may be required.⁷⁹ Under the original Zoning Code, electrical distributing substations are permitted by right in the following commercial and industrial zones: C2, C5, CM, MR1, M1, MR2, M2, M3.⁸⁰ Additionally, the original Zoning Code permits public utilities as a public benefit with performance standards in the following zones: agricultural zones (A1, A2, RA); residential zones (RE, RS, R1, RU, RZ, RW1, R2, RD1.5, RD2, RD3, RD4, RD 5, RD6, RMP, RW2, R3, RAS3, R4, RAS4, R5), commercial zones (CR, C1, C1.5, C4), and restricted industrial zones (MR1, MR2).⁸¹ Performance standards for public utilities in these zones are outlined in LAMC Section 14.00.A.6(a) and are intended to provide for landscaping, open space, scale, bulk, height, yards and setbacks that are similar to those in the adjacent properties in the neighborhood.⁸² For public utilities projects in the listed zones that cannot meet the listed performance standards, a Conditional Use Permit would be required.⁸³ Electrical distributing substations are not permitted as a public utility by right in the following zones under the original Zoning Code and would require a Conditional Use Permit in such zones: open space (OS), parking (P, PB), and public facilities (PF).⁸⁴

⁷⁸ Los Angeles Municipal Code Section 12.22.A.1 and Section 5D.3.11.

⁷⁹ Los Angeles Department of City Planning, Office of Zoning Administration. Case No. ZA-2022-7106-ZAI, Zoning Administrator's Interpretation, Lists of Uses Permitted in Various Zones, Citywide. December 20, 2022.

⁸⁰ Los Angeles Department of City Planning, Office of Zoning Administration. Case No. ZA-2022-7106-ZAI, Zoning Administrator's Interpretation, Lists of Uses Permitted in Various Zones, Citywide. December 20, 2022.

⁸¹ Los Angeles Department of City Planning, Office of Zoning Administration. Case No. ZA-2022-7106-ZAI, Zoning Administrator's Interpretation, Lists of Uses Permitted in Various Zones, Citywide. December 20, 2022.

⁸² Los Angeles Municipal Code Section 14.00.A.6(b).

⁸³ Los Angeles Municipal Code Section 14.00.B.1.

⁸⁴ Los Angeles Department of City Planning, Office of Zoning Administration. Case No. ZA-2022-7106-ZAI, Zoning Administrator's Interpretation, Lists of Uses Permitted in Various Zones, Citywide. December 20, 2022.

Under the new Zoning Code, minor utilities uses, which are defined as infrastructure that does not require significant health, safety, and environmental precautions, and does not require on-site personnel, including electrical substations, are permitted with screening standards in all use districts.⁸⁵ Minor utilities in any use district are required to comply with the F-Screen 3 frontage screening standards and the T-Screen 1 transitional screening standards.⁸⁶ The F-Screen 3 standards require walls at least 3.5 feet in height and a planting area at least 3 feet wide with a minimum of 20 screening plants and 3 large species trees for every 50 feet of length.⁸⁷ The T-Screen 1 transitional screening standards require walls at least 6 feet in height and a planting area at least 5 feet wide with a minimum of 3 large species trees for every 50 feet in length.⁸⁸

New Development

Less Than Significant Impact. Development of new distributing substations within the four identified study areas would occur within existing developed portions of the City. Existing substations throughout the City are on parcels designated and zoned for varying uses. As previously discussed, installation of public utilities infrastructure is generally allowed throughout the City but may require a Conditional Use Permit. Development of new distributing substations would occur within the four identified study areas, including the Sun Valley Study Area, Silver Lake Study Area, Southeast Study Area, and Wilmington Study Area. None of the four study areas are located within the boundaries of the Downtown Community Plan Area. As such, the study areas are currently subject to the requirements and development standards under the original Zoning Code. If development of a new distributing substation occurs on a parcel in the following commercial or industrial zones, this development would be permitted by right: C2, C5, CM, MR1, M1, MR2, M2, M3. If development of a new distributing substation occurs on a parcel in most other zones, with the exception of the open space zone (OS), parking zones (P, PB), and public facilities zone (PF), this development would be permitted as a public benefit project. If the new distributing substation is located on parcels zoned OS, P, PB, or PF, or the design of the new distributing substation does not meet the performance standards listed in LAMC Section 14.00.A.6(a), a Conditional Use Permit would be required.

If the community plans for the areas containing the four study areas are updated prior to development of the new distributing substations and the new Zoning Code would be in effect in these areas, the new distributing substations would be permitted in any use district and would be required to be designed to comply with the F-Screen 3 frontage screening standards and the T-Screen 1 transitional screening standards outlined in LAMC Section 4.C.8.

Once the specific locations are identified for each proposed new distributing substation, existing land use and zoning requirements for the selected parcel(s) would be reviewed to determine whether a Conditional Use Permit would be needed. If required, the Conditional Use Permit process would entail a review of the proposed new distributing substation to ensure compatibility with surrounding land uses. With approval of a Conditional Use Permit, if required, to allow the proposed new distributing substations, development of the new stations would not conflict with the applicable land use plans, policies, and regulations at the time of project implementation. The impact would be less than significant, and this issue related to new development will not be further analyzed in the PEIR.

⁸⁵ Los Angeles Municipal Code Article 5. Use, Part 5B. Use Districts.

⁸⁶ Los Angeles Municipal Code Article 5. Use, Part 5B. Use Districts.

⁸⁷ Los Angeles Municipal Code Section 4C.8.1.2.c.

⁸⁸ Los Angeles Municipal Code Section 4C.8.2.3.a.

Expansions

Less Than Significant Impact. Expansions would involve expanding the footprint of an existing substation and may require acquisition of one or more adjacent properties. Similar to the new distributing substations, expansions into parcels outside of the existing substation property may require a Conditional Use Permit to allow for the proposed expansion on a specific parcel. If an expansion into a parcel outside of an existing substation property is identified, existing land use and zoning requirements for the selected parcel(s) would be reviewed to determine whether a Conditional Use Permit would be needed. If required, the Conditional Use Permit process would entail a review of the proposed expansion to ensure compatibility with surrounding land uses. With approval of a Conditional Use Permit, if required, expansions would not conflict with the applicable land use plans, policies, and regulations at the time of project implementation. The impact would be less than significant and this issue related to expansions will not be further analyzed in the PEIR.

Minor Improvements

No Impact. Minor improvements at existing substations would be limited to the existing station property and would be consistent with the land uses at existing stations. No changes to existing land use or zoning designations would be required to implement the proposed minor improvements. Therefore, minor improvements would not conflict with applicable land use plans, policies, or regulations. No impact would occur, and this issue related to minor improvements will not be further analyzed in the PEIR.

Other Distribution System Improvements

No Impact. As previously discussed, other distribution system improvements could include, but not be limited to, upgrades to subtransmission lines and feeders, removal of existing pole-top transformer racks, deactivation of existing distributing substations, and other ancillary improvements. New or expanded subtransmission lines and feeders would be installed underground along existing road rights-of-way or utility easements. Following installation of subtransmission lines and feeders, the roadways and surfaces would be restored to pre-construction conditions. As previously discussed, both the original Zoning Code and the new Zoning Code exempt the construction, installation, operation, and maintenance of electric power transmission and distribution lines from zoning requirements and limitations.⁸⁹ Removal of pole-top transformer rack equipment and deactivation of existing distributing substations would occur at sites containing existing distribution system infrastructure. As such, no changes to existing land uses would be required to implement the other distribution system improvements. Thus, these improvements would not conflict with existing land use plans, policies, or regulations. Therefore, other distribution system improvements would not conflict with applicable land use plans, policies, or regulations. No impact would occur, and this issue related to other distribution system improvements will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development and expansions. No impact would occur related to minor improvements and other distribution system improvements. This issue will not be further analyzed in the PEIR.

⁸⁹ Los Angeles Municipal Code Section 12.22.A.1 and Section 5D.3.11.

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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

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?**
- 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?**

New Development

Less Than Significant Impact. Development of new distributing substations would occur within the four identified study areas, including the Sun Valley Study Area, Silver Lake Study Area, Southeast Study Area, and Wilmington Study Area.

According to the City of Los Angeles' Conservation Element of the General Plan and the California Department of Conservation's Geologic Energy Management Division (CalGEM) Well Finder, the Sun Valley Study Area and Southeast Study Area do not include oil fields. Therefore, new development in these two study areas would not result in the loss of availability of a mineral resource.

The Silver Lake Study Area has areas that are located within the Los Angeles City Oil Field, which is a State-designated oil field. The Wilmington Study Area includes areas that are located in the Torrance Oil Field and Wilmington Oil Field, which are State-designated oil fields.^{90,91} As such, the development of a new distributing substation in the Silver Lake Study Area and Wilmington Study Area may be located within areas that are historically associated with oil and gas extraction. However, current state and local policies no longer prioritize oil production as a mineral resource to be protected for future extraction. Under Assembly Bill 3233, local jurisdictions have the authority to restrict or prohibit oil and gas operations, and the City of Los Angeles is implementing regulations to phase out existing wells and prohibit new drilling.⁹² The City's proposed Oil and Gas Drilling Ordinance would amend the LAMC to reinstate the

⁹⁰ City of Los Angeles, Department of City Planning. *Conservation Element of the City of Los Angeles General Plan*. September 2001.

⁹¹ California Department of Conservation, Geologic Energy Management Division. Well Finder. Available at: <https://maps.conservation.ca.gov/calgem/findwells/>, accessed January 2026.

⁹² City of Los Angeles, Department of City Planning. Oil and Gas Drilling Ordinance. Available at: <https://planning.lacity.gov/plans-policies/oil-and-gas-drilling-ordinance>, accessed January 2026.

previously adopted policy for oil and gas drilling activity, which would prohibit new oil drilling and disallow the expansion or intensification of existing extraction activities and wells in all zones.⁹³ Accordingly, these policies reflect a shift away from treating petroleum deposits, such as those within the mentioned oil fields, as a resource intended for continued availability. Additionally, many of the wells in the Silver Lake and Wilmington Study Areas have already been plugged, and pursuant to the ordinance, would not be reopened. Furthermore, LADWP would not acquire properties that include active or idle oil wells. As such, development of new distributing substations would not result in the loss of availability of oil as a mineral resource.

According to the City of Los Angeles' Conservation Element and California Geological Survey (CGS), the Sun Valley Study Area and Southeast Study Area include areas that are designated by CGS as Mineral Resource Zone-2 (MRZ-2).^{94,95,96} Areas designated as MRZ-2 are those underlain by mineral deposits where geologic data indicate that significant Portland cement concrete aggregate resources (sand, gravel, and crushed stone) are present. The Silver Lake Study Area and Wilmington Study Area do not have areas designated as MRZ-2, and thus, new development in these areas would not result in the loss of availability of a known mineral resource.

Although areas within the Southeast Study Area are classified as MRZ-2, no aggregate extraction activities currently occur there, and such areas have been built out with urban uses and are inaccessible for such activities.⁹⁷ The Sun Valley Study Area, which is located within the San Fernando Valley Production-Consumption Region, includes active operations of mining aggregate, which is the number one non-fuel mineral commodity produced in California by value.^{98,99} However, these operations have been producing material since the mid-1950s, reserves are running low, and past mining operations have been exhausted and converted into landfills. Production has decreased steadily over the past two decades, and the region is not producing enough material locally to sustain the population. Thus, the majority of the mined aggregate consumed must be imported by rail and truck from neighboring regions, such as Palmdale or the Mojave Desert to meet the demand of the rapidly urbanizing regions in north Los Angeles County.¹⁰⁰ The Sun Valley Study Area has also been built out with urban uses, and MRZ-2 areas beyond existing or exhausted mining operations are inaccessible for such new mining activities.

⁹³ City of Los Angeles, Department of City Planning. Oil and Gas Drilling Ordinance. Fact Sheet. Available at: <https://planning.lacity.gov/plans-policies/oil-and-gas-drilling-ordinance>, accessed January 2026.

⁹⁴ City of Los Angeles, Department of City Planning. *Conservation Element of the City of Los Angeles General Plan*. September 2001.

⁹⁵ California Department of Conservation, California Geological Survey. *Special Report 254: Update of the Mineral Land Classification for Portland Cement Concrete Aggregate Resources in the San Fernando Valley and Saugus-Newhall Production-Consumption Regions*. 2021.

⁹⁶ California Department of Conservation, California Geological Survey. *Special Report 209: Update of the Mineral Land Classification for Portland Cement Concrete Aggregate in the San Gabriel Valley Production-Consumption Region, Los Angeles County, California*. 2010.

⁹⁷ City of Los Angeles, Department of City Planning. *Conservation Element of the City of Los Angeles General Plan*. September 2001.

⁹⁸ City of Los Angeles, Department of City Planning. *Sun Valley – La Tuna Canyon Community Plan*. 2016.

⁹⁹ California Department of Conservation, California Geological Survey. *Special Report 254: Update of the Mineral Land Classification for Portland Cement Concrete Aggregate Resources in the San Fernando Valley and Saugus-Newhall Production-Consumption Regions*. 2021.

¹⁰⁰ California Department of Conservation, California Geological Survey. *Special Report 254: Update of the Mineral Land Classification for Portland Cement Concrete Aggregate Resources in the San Fernando Valley and Saugus-Newhall Production-Consumption Regions*. 2021.

The new distributing substations would not involve any mineral resource extraction and would not be developed on sites with mining-related zoning. If LADWP seeks to acquire sites that are zoned with supplemental use overlay “G” for Surface Mining Operations Districts, development of new distributing substations within such sites may potentially preclude mining operations and result in the loss of availability of a known mineral resource. However, as discussed, no aggregate extraction activities currently in the Southeast Study Area, and its built-out setting prevents such activities from occurring there. Therefore, development of a new distributing substation in the Southeast Study Area would not result in a loss in the availability of a known mineral resource. Acquisition of a site that is zoned with supplemental use overlay “G” for new development in the Sun Valley Study Area would not result in a significant loss in availability of a known mineral resource as these active mining areas that are zoned for surface mining operations are already running low.

Therefore, new distributing substations 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 or the loss of availability of a locally-important mineral resource recovery site. Impacts would be less than significant, and this issue will not be further analyzed in the PEIR.

Expansions

Less Than Significant Impact. Expansions would involve expanding the footprint of an existing substation. The expansion proposed would depend on the size and configuration of the existing substation and design of the expansion. In some cases, an expansion may require acquisition of one or more adjacent properties. Any expansion that would be limited to the existing substation property would be consistent with the land uses at existing stations, none of which have mineral extraction. Any expansion that would require acquisition of property could impact the availability of mineral resources, if adjacent properties are within areas designated as MRZ-2, or are sites that are zoned with supplemental use overlay “G” for Surface Mining Operations Districts.

According to the City of Los Angeles’ Conservation Element and CalGEM’s Well Finder, twenty producing oil fields lie wholly or partially within the City.^{101,102} As a result, expansions into adjacent acquired properties may be located within areas that are historically associated with oil and gas extraction. However, as described under new development, current state and local policies reflect a shift away from treating petroleum deposits as a resource intended for continued availability. In addition, LADWP would not acquire properties that include active or idle oil wells. Therefore, expansions would not result in the loss of availability of oil as a mineral resource.

¹⁰¹ City of Los Angeles, Department of City Planning. *Conservation Element of the City of Los Angeles General Plan*. September 2001.

¹⁰² California Department of Conservation, Geologic Energy Management Division. Well Finder. Available at: <https://maps.conservation.ca.gov/calgem/findwells/>, accessed January 2026.

According to the City of Los Angeles' Conservation Element of the General Plan and CGS, the City and LADWP in-basin service area include MRZ-2 areas.^{103, 104, 105} Areas designated as MRZ-2 by CGS are those underlain by mineral deposits where geologic data indicate that significant Portland cement concrete aggregate resources (sand, gravel, and crushed stone) are present. As described above, the City has been predominantly built out with urban uses, and MRZ-2 areas beyond existing or exhausted mining operations are generally inaccessible for such new mining activities. Moreover, the only area in the City that allows large mining operations are those that are zoned with supplemental use overlay "G" for Surface Mining Operations Districts. This supplemental use overlay occurs in the Sun Valley-La Tuna Canyon and Arleta-Pacoima Community Plan Areas. The only existing substation adjacent to a site that is zoned with the supplemental use overlay "G" for Surface Mining Operations Districts is RS-M. If LADWP would expand RS-M into the parcels zoned for Surface Mining Operations Districts, the expansion may potentially preclude mining operations and result in the loss of availability of a known mineral resource. However, these parcels do not contain active mining operations; active mining operations in the area are already running low as the operations have been producing material since the mid-1950s.¹⁰⁶ Thus, the potential expansion of RS-M into the adjacent parcels would not result in a loss in availability of a known mineral resource. Therefore, expansions 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 or the loss of availability of a locally-important mineral resource recovery site. Impacts would be less than significant, and this issue will not be further analyzed in the PEIR.

Minor Improvements

No Impact. Minor improvements at existing substations would be limited to the existing station property and would be consistent with the land uses at existing stations. As no mineral extraction occurs at any existing substations, implementation of minor improvements would not affect the availability of mineral resources. Therefore, minor improvements 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 or the loss of availability of a locally-important mineral resource recovery site. No impact would occur, and this issue related to minor improvements will not be further analyzed in the PEIR.

Other Distribution System Improvements

No Impact. Other distribution system improvements could include, but not be limited to, upgrades to subtransmission lines and feeders, removal of existing pole-top transformer racks, deactivation of existing distributing substations, and other ancillary improvements. New or expanded subtransmission lines and feeders would be installed underground within existing road rights-of-way or utility easements. Such areas would be restored to pre-construction

¹⁰³ City of Los Angeles, Department of City Planning. *Conservation Element of the City of Los Angeles General Plan*. September 2001.

¹⁰⁴ California Department of Conservation, California Geological Survey. *Special Report 254: Update of the Mineral Land Classification for Portland Cement Concrete Aggregate Resources in the San Fernando Valley and Saugus-Newhall Production-Consumption Regions*. 2021.

¹⁰⁵ California Department of Conservation, California Geological Survey. *Special Report 209: Update of the Mineral Land Classification for Portland Cement Concrete Aggregate in the San Gabriel Valley Production-Consumption Region, Los Angeles County, California*. 2010.

¹⁰⁶ California Department of Conservation, California Geological Survey. *Special Report 254: Update of the Mineral Land Classification for Portland Cement Concrete Aggregate Resources in the San Fernando Valley and Saugus-Newhall Production-Consumption Regions*. 2021.

conditions upon completion of construction. Additionally, removal of pole-top transformer rack equipment and deactivation of existing distributing substations would occur at sites containing existing distribution system infrastructure. As such, no changes to existing land uses would be required to implement the other distribution system improvements. Therefore, other distribution system improvements 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 or the loss of availability of a locally-important mineral resource recovery site. No impact would occur, and this issue related to other distribution system improvements will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development and expansions. No impact would occur related to minor improvements and other distribution system improvements. This issue will not be further analyzed in the PEIR.

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?	☒	☐	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 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?	☒	☐	☐	☐

Discussion

- 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?**

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Potentially Significant Impact. The Proposed Program includes construction of four new distributing substations, expansion of existing substations, minor improvements to existing substations, and related activities for other distribution system improvements. These activities would generate noise during construction activities that may exceed applicable standards in proximity to sensitive noise receptors, such as residential uses, elder care facilities, and schools. Construction may include the use of noise-generating equipment such as excavators, loader/backhoes, dump trucks, dozers, graders, water trucks, concrete mixers, cranes, forklifts, delivery trucks, and asphalt trucks. Although noise related to construction activity would be temporary, it could potentially expose nearby sensitive receptors to noise levels above established standards. Operation of the new distributing substations or expansions into adjacent acquired properties may also generate new noise. Therefore, the Proposed Program may result in the generation of substantial temporary or permanent increases in ambient noise levels in the vicinity of specific project sites in excess of standards established in a general plan or noise ordinance. The impact is potentially significant, and this issue will be further analyzed in the PEIR.

CONCLUSION: Impacts would be potentially significant for the Proposed Program. This issue will be further analyzed in the PEIR.

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

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Potentially Significant Impact. Construction activities can generate varying degrees of vibration, depending on the activity 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.

Certain construction activities associated with the Proposed Program could result in groundborne vibration that could damage sensitive structures in close proximity to the project site. Operational activities are not anticipated to result in excessive groundborne vibration. Nonetheless, construction and operational activities will be evaluated further. The impact is potentially significant, and this issue will be further analyzed in the PEIR.

CONCLUSION: Impacts would be potentially significant for the Proposed Program. This issue will be further analyzed in the PEIR.

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?

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Potentially Significant Impact. The City and greater Los Angeles area contain multiple airports that have are located near the potential sites for the new distributing substations, existing substations, and other distribution system improvements, including but not limited to, Los Angeles International Airport, Whiteman Airport, Van Nuys Airport, Hollywood Burbank Airport, Santa Monica Airport, and Compton/Woodley Airport.¹⁰⁷ Construction workers, maintenance staff, and other people residing or working in specific project sites may be exposed to excessive noise levels due to airports. The impact is potentially significant, and this issue will be further analyzed in the PEIR.

CONCLUSION: Impacts would be potentially significant for the Proposed Program. This issue will be further analyzed in the PEIR.

¹⁰⁷ Santa Monica Airport is scheduled to permanently close on December 31, 2028.

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

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)?**

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

No Impact. As described in Section 1.3, Project Background, LADWP implements the Power System Reliability Program to evaluate and prioritize the maintenance and replacement of major power infrastructure components in order to maintain reliable electricity service to its customers now and in the future. The purpose of the Power System Reliability Program is to improve the reliability of the power system by providing proactive replacement and maintenance, addressing overloads, and increasing grid capacity. Based on the goals of the Power System Reliability Program and the LADWP's 2025 Distribution Load Forecast Report, LADWP has identified a need for the Proposed Program. Specifically, the program includes the development of four new distributing substations, expansions and minor improvements at existing substations, and other distribution system improvements. These improvements would enhance system reliability, provide redundancy, improve resiliency to extreme climate events, and support state and local clean-energy mandates. Modernization of the distribution system and its infrastructure is essential to meet current needs, address safety concerns, and accommodate anticipated future demand.

The Los Angeles urban area has a large construction labor force capable of building out the Proposed Program. Although some construction activities for specific projects under the Proposed Program may overlap and occur concurrently, construction would be temporary and would not require a substantial number of workers relative to the regional labor supply. Additionally, the operation of the new distributing substations would be largely automated and would not require on-site personnel except for inspection and maintenance activities. Expansions, minor improvements, and other distributing substation improvements would similarly rely on automated controls during operation. The operational workforce would also primarily consist of existing LADWP workers.

Therefore, the Proposed Program would not generate or induce population growth and would instead accommodate planned growth and the associated growing demand for electricity. No

impact would occur, and this issue will not be further analyzed in the PEIR.

CONCLUSION: No impact would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

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

New Development and Expansions

Potentially Significant Impact. Development of new distributing substations would occur within the four identified study areas, including the Sun Valley Study Area, Silver Lake Study Area, Southeast Study Area, and Wilmington Study Area. The four new distributing substations would require the acquisition of properties. In addition, under the Proposed Program, an expansion of an existing substation could involve development into an adjacent acquired property. If the properties that are acquired are not occupied by residents or housing, new distributing substations and expansions would not result in the displacement of residents or housing units, and no impacts would occur. However, if the properties that are acquired are occupied by residents or housing units, new distributing substations and expansions would result in displacement of existing people or housing, which may necessitate the construction of replacement housing elsewhere. LADWP would not acquire properties with high-medium density residential or higher (more than 56 units per acre). However, the impact is considered potentially significant, and this issue will be further analyzed in the PEIR.

Minor Improvements and Other Distribution System Improvements

No Impact. Minor improvements at existing substations would be limited to the existing station property and would not displace substantial numbers of existing people or housing. Other distribution system improvements could include, but not be limited to, upgrades to subtransmission lines and feeders, removal of existing pole-top transformer racks, deactivation of existing distributing substations, and other ancillary improvements. New or expanded subtransmission lines and feeders would be installed underground along existing road rights-of-way or utility easements, and thus, would not remove housing. Additionally, removal of pole-top transformer rack equipment and deactivation of existing distributing substations would occur at sites containing existing distribution system infrastructure. As such, no changes to existing land uses would be required to implement the other distribution system improvements. Therefore, other distribution system improvements would not displace substantial numbers of existing people or housing. No impact would occur, and this issue will not be further analyzed in the PEIR.

CONCLUSION: Impacts would be potentially significant for new development and expansions. This issue for new development and expansions will be further analyzed in the PEIR. No impact would occur related to minor improvements and other distribution system improvements. This issue for minor improvements and other distribution system improvements will not be further analyzed in the PEIR.

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?	☒	☐	☐	☐
ii) Police protection?	☒	☐	☐	☐
ii) Schools?	☐	☐	☐	☒
iv) Parks?	☒	☐	☐	☐
v) Other public facilities?	☒	☐	☐	☐

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?**

New Development and Expansions

Potentially Significant Impact. The City of Los Angeles Fire Department (LAFD) is responsible for providing fire protection services in the City, including LADWP's in-basin service area. The LAFD provides a spectrum of life safety services, including fire prevention, firefighting, medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community services to approximately 3.9 million people in the City.¹⁰⁸ LAFD maintains 106 fire stations and four bureaus across its approximately 468 square-mile jurisdiction.¹⁰⁹

An increased demand for fire protection is generally associated with new development (e.g., residential, commercial, industrial) or an increase in population in a service area. As discussed above in Section 3.14, Population and Housing, the Proposed Program would not directly or indirectly induce population growth. Modernization of the distribution system and its infrastructure is essential to meet current needs, address safety concerns, and accommodate anticipated future demand. Construction activities would be temporary and would not introduce

¹⁰⁸ U.S. Census Bureau. Total Population in Los Angeles City, California. Available at: <https://data.census.gov/all?q=Los+Angeles+city,+California>, accessed October 28, 2025.

¹⁰⁹ Los Angeles Fire Department. Our Mission. Available at: <https://lafd.org/about/about-lafd/our-mission>, accessed October 28, 2025.

new residents or long-term workers. In addition, construction activities would not impede emergency response and access. New distributing substations would be constructed in conformance with the latest Los Angeles Fire Code standards and applicable federal, state, or industry standards (including those set by the California Public Utilities Commission and the National Electric Safety Code). Expansions would serve a similar function as the existing substation. Similar to existing conditions, LADWP would continue to perform routine testing of fire equipment as well as routine inspection and maintenance of its substations and infrastructure. As such, the proposed development of new distributing substations and expansions would not result in an increased demand for fire protection services related to population growth.

However, LADWP could potentially acquire land from fire protection facilities (e.g., a portion of a fire station parcel, training facility, or fire agency-owned land) to develop new distributing substations or expansions of existing substations. Acquisition of fire protection facilities could result in impacts related to acceptable service ratios, response times or other performance objectives. Therefore, impacts related to fire protection are potentially significant, and this issue will be further analyzed in the PEIR.

Minor Improvements and Other Distribution System Improvements

Less Than Significant Impact. As discussed above and in Section 3.14, Population and Housing, the Proposed Program would not directly or indirectly induce population growth. Modernization of the distribution system and its infrastructure is essential to meet current needs, address safety concerns, and accommodate anticipated future demand. Construction activities would be temporary and would not introduce new residents or long-term workers. Furthermore, minor improvements and other distribution system improvements would not require acquisition of land from fire protection facilities and would conform with the latest Los Angeles Fire Code standards and applicable federal, state, or industry standards (including those set by the California Public Utilities Commission and the National Electric Safety Code). Therefore, no new or physically altered fire protection facilities would be required to maintain acceptable service ratios, response times or other performance objectives. Impacts would be less than significant, and this issue will not be further analyzed in the PEIR.

CONCLUSION: Impacts would be potentially significant for new development and expansions. This issue for new development and expansions will be further analyzed in the PEIR. Less than significant impacts would occur related to minor improvements and other distribution system improvements, and therefore, will not be further analyzed in the PEIR.

ii. Police protection?

New Development and Expansions

Potentially Significant Impact. The City of Los Angeles Police Department (LAPD) is the local law enforcement agency responsible for providing police protection services in the City, including LADWP's in-basin service area. The LAPD includes four bureaus, 21 community police stations, and provides various police protection services, including an Air Support

Division, Mounted Units, Special Weapons and Tactics Unit, and K-9.^{110,111}

An increased demand for police protection is generally associated with new development (e.g., residential, commercial, industrial) or an increase in population in a service area. As discussed above in Section 3.14, Population and Housing, the Proposed Program would not directly or indirectly induce population growth. Construction activities would be temporary and would not introduce new residents or long-term workers. In addition, construction activities would not impede emergency response and access. New distributing substations would include physical security features, such as walls and security lighting, and would rely on automated controls during operation, which would minimize the need for police services. Expansions would serve a similar function as the existing substation, and would not increase the demand for police services. As such, the proposed development of new distributing substations and expansions would not result in an increased demand for police protection services related to population growth.

However, LADWP could potentially acquire land from police protection facilities (e.g., a training facility or LAPD-owned land) to develop new distributing substations or expansions of existing substations. Acquisition of police protection facilities could result in impacts related to acceptable service ratios, response times or other performance objectives. Therefore, impacts related to police protection are potentially significant, and this issue will be further analyzed in the PEIR.

Minor Improvements and Other Distribution System Improvements

Less Than Significant Impact. As discussed above and in Section 3.14, Population and Housing, the Proposed Program would not directly or indirectly induce population growth. Modernization of the distribution system and its infrastructure is essential to meet current needs, address safety concerns, and accommodate anticipated future demand. Construction activities would be temporary and would not introduce new residents or long-term workers. Furthermore, minor improvements and other distribution system improvements would not require acquisition of land from police protection facilities. Additionally, as part of minor improvements under the Proposed Program, physical security measures and upgrades for existing substations would be implemented, which would further minimize 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. Impacts would be less than significant, and this issue will not be further analyzed in the PEIR.

CONCLUSION: Impacts would be potentially significant for new development and expansions. This issue for new development and expansions will be further analyzed in the PEIR. Less than significant impacts would occur related to minor improvements and other distribution system improvements, and therefore, will not be further analyzed in the PEIR.

¹¹⁰ Los Angeles Police Department. About LAPD. Available at: <https://supportlapd.org/about-lapd/>, accessed October 28, 2025.

¹¹¹ Los Angeles Police Department. LAPD Divisions by Bureau. Available at: <https://lapdonlinestrgeacc.blob.core.usgovcloudapi.net/lapdonlinemedia/2021/09/citywide.pdf>, accessed October 28, 2025.

iii. Schools?

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

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 Program would not directly or indirectly induce population growth. Therefore, the Proposed Program would not require the construction of additional schools or the expansion of existing schools related to population growth. Additionally, LADWP would not acquire any active school district-owned properties, such as schools, school-support facilities, and administration buildings, to develop new distributing substations or expansions of existing substations. School buildings and school district-owned properties that are listed for sale may be acquired to develop new distributing substations or expansions; however, acquisitions of these types of properties would not result in impacts related to acceptable service ratios, response times or other performance objectives for schools. Therefore, no impact would occur, and this issue will not be further analyzed in the PEIR.

CONCLUSION: No impact would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

iv. Parks?

New Development and Expansions

Potentially Significant Impact. The City of Los Angeles Department of Recreation and Parks operates and maintains over 16,000 acres of parkland, 559 park sites, hundreds of athletic fields, 411 playgrounds, 319 tennis courts, 123 recreation centers, over 130 outdoor fitness areas, 59 swimming pools and aquatic centers, 29 senior centers, 27 skate parks, 13 golf courses, 12 museums, and 13 dog parks.¹¹²

The demand for parks is generally associated with population growth. As discussed above in Section 3.14, Population and Housing, the Proposed Program would not directly or indirectly induce population growth. Thus, the demand for parks would not increase with development of new distributing substations and expansions related to population growth.

However, LADWP could potentially acquire parkland to develop new distributing substations or expansions of existing substations. Acquisition of parkland could result in impacts related to acceptable service ratios, response times or other performance objectives. Therefore, this impact would be potentially significant, and this issue will be further analyzed in the PEIR.

Minor Improvements and Other Distribution System Improvements

No Impact. Minor improvements at existing substations would be limited to existing substation properties and would not require new or physically altered parks. Other distribution system improvements would be installed along existing road rights-of-way, or would occur at sites containing existing distribution system infrastructure. While new subtransmission lines and

¹¹² City of Los Angeles, Department of Recreation and Parks. Who We Are. Available at: <https://recreation.parks.lacity.gov/departments/who-we-are>, accessed June 4, 2026.

feeders could also be installed underground within existing utility easements, such areas would be restored to pre-construction conditions upon completion of construction. As such, other distribution system improvements would not require new or physically altered parks. Therefore, no impact would occur, and this issue will not be further analyzed in the PEIR.

CONCLUSION: Impacts related to new development and expansions would be potentially significant. This issue for new development and expansions will be further analyzed in the PEIR. No impact would occur related to minor improvements and other distribution system improvements, and therefore, this issue will not be further analyzed in the PEIR.

v. Other public facilities?

New Development and Expansions

Potentially Significant Impact. The demand for other public facilities, such as libraries, civic buildings, and government-owned hospitals, is generally associated with population growth. As discussed above, the Proposed Program would not directly or indirectly induce population growth. Therefore, the proposed development of new distributing substations and expansions would not result in an increased demand for other public facilities related to population growth.

However, LADWP could potentially acquire other government-owned facilities (e.g., corporation yards, civic buildings, libraries, or publicly-owned hospitals) to develop new distributing substations and expansions of existing substations. Acquisition of these other public facilities could result in impacts related to acceptable service ratios, response times or other performance objectives. Therefore, this impact is potentially significant, and this issue will be further analyzed in the PEIR.

Minor Improvements and Other Distribution System Improvements

No Impact. Minor improvements at existing substations would be limited to existing substation properties and would not require new or physically altered other public facilities. Other distribution system improvements would be installed along existing road rights-of-way, or would occur at sites containing existing distribution system infrastructure. While new subtransmission lines and feeders could also be installed underground within existing utility easements, such areas would be restored to pre-construction conditions upon completion of construction. As such, other distribution system improvements would not require new or physically altered other public facilities. Therefore, no impact would occur, and this issue will not be further analyzed in the PEIR.

CONCLUSION: Impacts related to new development and expansions would be potentially significant. This issue for new development and expansions will be further analyzed in the PEIR. No impact would occur related to new minor improvements and other distribution system improvements, and therefore, this issue will not be further analyzed in the PEIR.

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?	☒	☐	☐	☐
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?	☐	☐	☐	☒

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?**

New Development and Expansions

Potentially Significant Impact. As discussed, the City of Los Angeles Department of Recreation and Parks operates and maintains over 16,000 acres of parkland, 559 park sites, hundreds of athletic fields, 411 playgrounds, 319 tennis courts, 123 recreation centers, over 130 outdoor fitness areas, 59 swimming pools and aquatic centers, 29 senior centers, 27 skate parks, 13 golf courses, 12 museums, and 13 dog parks.¹¹³ Of the parkland, the City operates 34 regional parks (typically defined as parks of 50 acres or more in size).¹¹⁴

The use of existing neighborhood and regional parks or other recreational facilities could increase if additional demand for these facilities is generated through population growth. As discussed in Sections 3.14, Population and Housing, and 3.15, Public Services, new development and expansions would not induce population growth or directly result in an increased demand for parks or recreational facilities; therefore, substantial physical deterioration of these facilities would not occur under the Proposed Program.

However, as LADWP could potentially acquire parkland, including recreational facilities, to develop new distributing substations or expansions, the demand for other parks and recreational facilities in the immediate area may increase such that substantial physical deterioration of these facilities would occur or be accelerated. Therefore, this impact would be potentially significant, and this issue will be further analyzed in the PEIR.

Minor Improvements and Other Distribution System Improvements

No Impact. Minor improvements at existing substations would be limited to the existing

¹¹³ City of Los Angeles, Department of Recreation and Parks. Who We Are. Available at: <https://recreation.parks.lacity.gov/departments/who-we-are>, accessed June 4, 2026.

¹¹⁴ City of Los Angeles, Department of Recreation and Parks. Parks Needs Assessment. Available at: https://needs.parks.lacity.gov/wp-content/uploads/2025-LA-Park-Needs-Assessment_web.pdf, accessed August 2026.

substation property and would require the acquisition of parkland, including recreational facilities. Other distribution system improvements would be installed along existing road rights-of-way, or would occur at sites containing existing distribution system infrastructure. While new subtransmission lines and feeders could also be installed underground within existing utility easements, such areas would be restored to pre-construction conditions upon completion of construction. As such, other distribution system improvements would not take park land. Accordingly, implementation of minor improvements and other distribution system improvements would not 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. Therefore, no impact would occur, and this issue will not be further analyzed in the PEIR.

CONCLUSION: Impacts related to new development and expansions would be potentially significant for the Proposed Program. This issue for new development and expansions will be further analyzed in the PEIR. No impact would occur related to minor improvements and other distribution system improvements, and therefore, this issue will not be further analyzed in the PEIR.

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?

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

No Impact. Modernization of the distribution system and its infrastructure is essential to meet current needs, address safety concerns, and accommodate anticipated future demand. The Proposed Program does not include recreational facilities and would not generate population growth necessitating the construction and expansion of recreational facilities. While LADWP could potentially acquire parkland to develop new distributing substations or expansions of existing substations, the construction or expansion of any replacement recreational facilities, if necessary, would undergo independent environmental review.

Minor improvements at existing substations would be limited to the existing substation property while other distribution system improvements would be installed along existing road rights-of-way, or would occur at sites containing existing distribution system infrastructure. While new subtransmission lines and feeders could also be installed underground within existing utility easements, such areas would be restored to pre-construction conditions upon completion of construction. As such, these activities would not include recreational facilities or require the construction or expansion of recreational facilities.

Accordingly, implementation of new development, expansions, minor improvements, and other distribution system improvements as part of the Proposed Program would not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, no impact would occur, and this issue will not be further analyzed in the PEIR.

CONCLUSION: No impact would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

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?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☐	☒
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

Discussion

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

The City's Mobility Element of the General Plan, Mobility Plan 2035, is the primary plan that governs the circulation system in the City. The primary goals of Mobility Plan 2035 are: safety first; access for all Angelenos; world class infrastructure; collaboration, communication, and informed choices; and clean environments and healthy communities. The Mobility Plan sets forth programs to achieve the goals stated in the plan, which guide development of a citywide transportation system which provides the efficient movement of people and goods.¹¹⁵

New Development

Less Than Significant Impact. Development of new distributing substations would occur within the four identified study areas, including the Sun Valley Study Area, Silver Lake Study Area, Southeast Study Area, and Wilmington Study Area, which all include transit, roadway, bicycle, and pedestrian facilities. As the development of new distributing substations would require extensive construction activities (i.e., site preparation, foundations and structures, installation, and finishing), temporary traffic lane closures may be required during construction to accommodate staging and laydown areas for construction materials and equipment and worker vehicle parking. Additionally, transit stops may be temporarily closed or routes may be rerouted. Bicycle and pedestrian facilities may also require temporary rerouting during construction. Accordingly, a site-specific traffic control plan would be prepared for review and approval by the LADOT and would include measures such as signage, flag persons, and lane detours as necessary to minimize disruptions to traffic. Preparation of a traffic control plan would be consistent with Policy 1.6, Multi-Modal Detour Facilities, of Mobility Plan 2035 to design detour facilities to provide safe passage for all modes of travel during times of construction. These disruptions would be temporary during construction and would cease upon completion of the

¹¹⁵ City of Los Angeles, Department of City Planning. *Mobility Plan 2035, An Element of the General Plan*. September 7, 2016.

new distributing substations.

During operation, the distributing substations would be unmanned and would be remotely monitored via a SCADA system. In addition, ongoing maintenance and system testing involving occasional personnel visits to the substation would occur. As such, the new distributing substations would not generate vehicle trips that would conflict with the policies in Mobility Plan 2035 to reduce vehicle miles traveled (VMT). Therefore, the development of new distributing substations would not conflict with a program, plan, ordinance, or policy addressing the circulation system. Impacts would be less than significant, and this issue will not be further analyzed in the PEIR.

Expansions

Less Than Significant Impact. Expansions would involve expanding the footprint of an existing substation. The expansion proposed would depend on the size and configuration of the existing substation and design of the expansion. In some cases, an expansion may require acquisition of one or more adjacent properties. Expansions would not span across or block existing roadways. As with the development of new distributing substations, expansions may require extensive construction activities (i.e., site preparation, foundations and structures, installation, and finishing, etc.). It is anticipated that temporary traffic lane closures would be required to accommodate staging and laydown areas for construction materials and equipment and worker vehicle parking. Additionally, transit stops may be temporarily closed or routes may be rerouted. Bicycle and pedestrian facilities may also require temporary rerouting during construction. Accordingly, a site-specific traffic control plan would be prepared for review and approval by LADOT and would include measures to minimize disruptions to traffic. Preparation of a traffic control plan would be consistent with Policy 1.6, Multi-Modal Detour Facilities, of Mobility Plan 2035 to design detour facilities to provide safe passage for all modes of travel during times of construction. These disruptions would be temporary during construction of expansions and would cease upon the resumed operation of specific substations.

Any expansion that would be limited to the existing substation property would not conflict with a program, plan, ordinance or policy addressing the circulation system. Any expansion that would require acquisition of property could impact the circulation system. However, expansions would be developed within existing single or adjoining parcels and would not span across or block existing roadways. Existing roadways, and bus, bicycle, and pedestrian facilities would continue to provide circulation, and expansions into adjacent parcels would not conflict with a program, plan, ordinance or policy addressing the circulation system.

Therefore, expansions of existing substations would not conflict with a program, plan, ordinance, or policy addressing the circulation system. Impacts would be less than significant, and this issue will not be further analyzed in the PEIR.

Minor Improvements

Less Than Significant Impact. Minor improvements to existing substations could include upgrades to modernize and replace equipment, adding equipment to vacant positions, and improvements to substation security and protection. Due to the minimal construction effort, it is not anticipated that construction of minor improvements would require any temporary traffic lane closures that could impact the circulation system. If sidewalk and/or parking lane closures are required during construction, a site-specific traffic control plan would be prepared for review and approval by the LADOT to provide for the safe movement of pedestrians and bicyclists.

Once operational, minor improvements at existing substations would result in conditions essentially the same as existing conditions. Therefore, minor improvements at existing substations would not conflict with a program, plan, ordinance, or policy addressing the circulation system. Impacts would be less than significant, and this issue will not be further analyzed in the PEIR.

Other Distribution System Improvements

Less Than Significant Impact. Other distribution system improvements could include, but not be limited to, upgrades to subtransmission lines and feeders, removal of pole-top transformer racks, deactivation of existing distributing substations, and other ancillary improvements. Removal of existing pole-top distributing equipment may require temporary lane closures for a few days. Accordingly, a site-specific traffic control plan would be prepared for review and approval by LADOT and would include measures to minimize disruptions to traffic. Any necessary disruptions would be temporary and short-term, and the roadway and transit, bicycle, and pedestrian facilities would be restored to pre-construction conditions after completion of such system improvements.

Construction activities for upgrades to subtransmission lines and feeders could take place within the existing road rights-of-way. As described in Section 1.6.3, Other Distribution System Improvements, construction would typically occur within an approximately 800- to 1,000-foot work area, within traffic lanes, and would progress along the alignment instead of being constructed all at once. Project construction activities within the road rights-of-way would require lane closures, which would disrupt traffic in the area of the construction zones, including automobile, bus, and bicycle traffic. A traffic control plan, as required by LADOT, would include measures such as signage, flag persons, and lane detours as necessary to minimize disruptions to traffic. These disruptions would be temporary and relatively short-term, and would not represent a conflict with a program, plan, ordinance or policy addressing the circulation system. Following the completion of construction activities, all road rights-of-way would be returned to pre-construction conditions. Construction activities for upgrades to subtransmission lines and feeders could also take place within the existing utility easements. Similar to construction within existing road rights-of-way, any disruptions would be temporary and relatively short-term, and would not represent a conflict with a program, plan, ordinance or policy addressing the circulation system. Following construction, all disturbed surfaces would be restored to pre-construction conditions. Therefore, other distribution system improvements would not conflict with a program, plan, ordinance, or policy addressing the circulation system. Impacts would be less than significant, and this issue will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

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

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

No Impact. CEQA Guidelines Section 15064.3(b) establishes VMT as the most appropriate measure for determining the significance of a project's transportation impacts. Under the Governor's Office of Land Use and Climate Innovation (previously known as the Governor's

Office of Planning and Research) guidance, VMT refers to the amount and distance of automobile travel attributable to a project. Automobile in this context refers to on-road passenger vehicles, specifically cars and light trucks, and excludes heavy-duty trucks.

Individual local jurisdictions were tasked with preparing specific implementation guidelines for procedures to assess transportation impacts related to project VMT within their boundaries, including establishing thresholds of significance. As the Proposed Program is located in the City of Los Angeles, the LADOT Transportation Assessment Guidelines (LADOT Guidelines) apply to the assessment of the Proposed Program's conflicts or inconsistencies with CEQA Guidelines Section 15064.3(b).¹¹⁶

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 specific 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.

Under the LADOT Guidelines, public services, including public utility functions such as LADWP's substations, are generally assumed to not generate substantial VMT, and therefore, are presumed to have a less than significant impact on VMT. Public services land uses are often built in response to development from other land uses (e.g., office and residential). Furthermore, according to the 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). As discussed in Section 1.7, Project Operation, under existing conditions, LADWP's substations are largely automated and remotely monitored via a SCADA system, which allows for remote control and monitoring communications by the Energy Control Center, a central command center for LADWP. Personnel also conduct periodic inspections and respond to outages onsite. Under the Proposed Program, the operation of new distributing substations would be similar to the operation of existing substations, and the operation of existing substations that are expanded or undergo minor improvements would be similar to existing operations. In addition, other distribution system improvements would support the operation of LADWP's overall system and would be implemented without increasing the number of existing personnel. As such, implementation of the Proposed Program would not necessitate an increase in workers that would generate a net increase of 250 daily vehicle trips. Therefore, no impact would occur, and this issue will not be further analyzed in the PEIR.

CONCLUSION: No impact would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

¹¹⁶ Los Angeles Department of Transportation. *Transportation Assessment Guidelines*. August 2022. Available at: https://ladot.lacity.gov/sites/default/files/documents/2020-transportation-assessment-guidelines_final_2020.07.27_0.pdf.

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)?

New Development

Less Than Significant Impact. Development of new distributing substations would occur within the four identified study areas, including the Sun Valley Study Area, Silver Lake Study Area, Southeast Study Area, and Wilmington Study Area. Development of new distributing substations would require extensive construction activities (i.e., site preparation, foundations and structures, installation, and finishing). Temporary traffic lane closures may be required during construction to accommodate staging and laydown areas for construction materials and equipment and worker vehicle parking. Additionally, transit stops may be temporarily closed or routes may be rerouted. Bicycle and pedestrian facilities may also require temporary rerouting during construction. Accordingly, a site-specific traffic control plan would be prepared for review and approval by LADOT and would include measures such as signage, flag persons, and lane detours as necessary to minimize disruptions to traffic and provide for the safe movement of road users. The potential hazards related to lane closures would be temporary during construction, minimized through the requirements of a traffic control plan, and would cease upon the completion of the new distributing substations.

New distributing substations would be designed in accordance with LADOT requirements for ingress/egress to ensure safety and visibility for roadway users, and thus, would not increase any hazards due to a geometric design feature. Similar to existing substations throughout the City, new distributing substations would be located in areas that are urban and primarily built out with various uses, including residential, commercial, open space, public facilities, industrial, and other uses. Thus, the introduction of a new distributing substation would not represent an incompatible use that could increase roadway hazards. As such, new distributing substations would not introduce incompatible uses or geometric design features that would substantially increase transportation-related hazards. Impacts would be less than significant, and this issue will not be further analyzed in the PEIR.

Expansions

Less Than Significant Impact. Expansions would involve expanding the footprint of an existing substation. The expansion proposed would depend on the size and configuration of the existing substation and design of the expansion. In some cases, an expansion may require acquisition of one or more adjacent properties. However, expansions would not span across or block existing roadways. As with the development of new distributing substations, expansions may require extensive construction activities (i.e., site preparation, foundations and structures, installation, and finishing, etc.). As such, it is anticipated that temporary traffic lane closures would be required during construction to accommodate staging and laydown areas for construction materials and equipment and worker vehicle parking. Additionally, transit stops may be temporarily closed or routes may be rerouted. Bicycle and pedestrian facilities may also require temporary rerouting during construction. Accordingly, a site-specific traffic control plan would be prepared for review and approval by LADOT and would include measures to minimize disruptions to traffic and provide for the safe movement of road users. These potential hazards related to lane closures would be temporary during construction of expansions, minimized through the requirements of a traffic control plan, and would cease upon the resumed operation of the existing and expanded substation. Expansions that require new driveways or access points to the street or road right-of-way would be designed in accordance with LADOT

requirements for ingress/egress to ensure safety and visibility for roadway users, and thus, would not increase any hazards due to a geometric design feature. Furthermore, because expansions of existing substations would occur within existing site boundaries or on adjacent properties in largely urbanized and built-out portions of LADWP's in-basin service area, expansions would not introduce incompatible uses. Therefore, impacts would be less than significant, and this issue will not be further analyzed in the PEIR.

Minor Improvements

Less Than Significant Impact. The Proposed Program would also involve minor improvements to existing substations, which would be limited to the existing substation property. Due to the minimal construction effort, it is not anticipated that construction of minor improvements would require any temporary traffic lane closures that could impact the circulation system. If sidewalk and/or parking lane closures are required during construction, a site-specific traffic control plan would be prepared for review and approval by the LADOT to provide for the safe movement of pedestrians and bicyclists. Minor improvements could include physical protection and security upgrades, such as a perimeter wall. The perimeter wall, if providing new or changed access points, would be designed in accordance with LADOT requirements for ingress/egress to ensure safety and visibility for roadway users, and thus, would not increase any hazards due to a geometric design feature. Minor improvements would also modernize and replace equipment and install ancillary equipment; these activities would not modify the site plans of existing substations and would not increase hazards related to geometric design features such as sharp curves or dangerous access points. Furthermore, as proposed minor improvements would be located within existing substation property, such improvements would not introduce incompatible uses. Therefore, impacts would be less than significant, and this issue will not be further analyzed in the PEIR.

Other Distribution System Improvements

Less Than Significant Impact. Other distribution system improvements could include, but not be limited to, upgrades to subtransmission lines and feeders, removal of existing pole-top transformer racks, deactivation of existing distributing substations, and other ancillary improvements. Removal of existing pole-top distributing equipment may require temporary lane closures for a few days. Accordingly, a site-specific traffic control plan would be prepared for review and approval by LADOT and would include measures to minimize disruptions to traffic. Any necessary disruptions would be temporary and short-term, and the roadway and transit, bicycle, and pedestrian facilities would be restored to pre-construction conditions after completion of such system improvements.

Construction activities for upgrades to subtransmission lines and feeders could take place within the existing road rights-of-way. As described in Section 1.6.3, Other Distribution System Improvements, construction would typically occur within an approximately 800- to 1,000-foot work area, within traffic lanes, and would progress along the alignment instead of being constructed all at once. Project construction activities within the road rights-of-way would require lane closures, which would disrupt traffic in the area of the construction zones, including automobile, bus, and bicycle traffic. A traffic control plan, as required by LADOT, would include measures such as signage, flag persons, and lane detours as necessary to minimize disruptions to traffic and provide for the safe movement of road users. The potential hazards related to lane closures would be temporary and relatively short-term, and would be minimized through the requirements of the traffic control plan. Following the completion of construction activities, all road rights-of-way would be returned to pre-construction conditions. Construction activities for

upgrades to subtransmission lines and feeders could also take place within the existing utility easements. Similar to construction within existing road rights-of-way, any disruptions would be temporary and relatively short-term, and would not substantially increase hazards due to a geometric design feature or incompatible uses. Following construction, all disturbed surfaces would be restored to pre-construction conditions. Therefore, other distribution system improvements would not substantially increase hazards due to a geometric design feature or incompatible uses. Impacts would be less than significant, and this issue will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

d) Would the project result in inadequate emergency access?

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Less Than Significant Impact. The City of Los Angeles Emergency Management Department coordinates evacuations in the case of emergency with the LAPD, LAFD, and the County of Los Angeles, as outlined in the City's Emergency Operations Plan.¹¹⁷ The County of Los Angeles also designates disaster routes within the entire County. Under the Proposed Program, as identified in Section 3.17(a), above, the construction of new distributing substations, expansions of existing substations, minor improvements, and other distribution system improvements would result in minor to extensive construction activities that would require site-specific traffic control plans. Such plans would be prepared for review and approval by LADOT and would include measures such as signage, flag persons, and lane detours as necessary to minimize disruptions to traffic and maintain emergency access during construction activities. Disruptions would be temporary during construction and would cease upon completion of the new distributing substations, expanded or improved substations, and distribution system improvements. Emergency access to specific project sites and their surrounding areas, particularly for emergency response vehicles, would be maintained at all times during construction. Specifically, during construction of other distribution system improvements that would require the installation of the subtransmission lines and/or feeders within existing road rights-of-way, construction activities would typically occur within an approximately 800- to 1,000-foot work area, within traffic lanes. As such, rolling partial lane closures would be required for installation of conduit. Traffic control plans would be prepared in coordination with LADOT to delineate traffic lanes around work areas and to modify any turn lane pockets affected by installation of lines at major intersections. No streets would be permanently closed as a result of other distribution system improvements and following installation of the proposed subtransmission lines and feeders, the roadways would be returned to their existing condition.

New distributing substations and expansions would be designed in accordance with LADOT requirements for emergency ingress/egress to ensure safety and visibility for roadway users. During operation, substations would be unmanned but remotely monitored via a SCADA system, while personnel visits for inspection and maintenance activities would occur occasionally. Therefore, the Proposed Program would not impair emergency response and

¹¹⁷ City of Los Angeles, Emergency Management Department. *City of Los Angeles Base Emergency Operations Plan*. 2023. Available at: https://emergency.lacity.gov/sites/g/files/wph1791/files/2023-10/Emergency%20Operations%20Base%20Plan_2023.pdf.

disaster routes or result in inadequate emergency access. Impacts would be less than significant, and this issue will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

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

Discussion

- 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)?**

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Potentially Significant Impact. Tribal cultural resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe. The identification of tribal cultural resources pursuant to Assembly Bill (AB) 52 requires that a lead agency consult with California Native American tribes who request formal consultation regarding potential impacts to tribal cultural resources. This consultation is being conducted by LADWP, the outcome of which is unknown. The impact is potentially significant, and this issue will be further analyzed in the PEIR.

CONCLUSION: Impacts would be potentially significant for the Proposed Program. This issue will be further analyzed in the PEIR.

- 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?**

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Potentially Significant Impact. The Native American Heritage Commission identified Native American tribal representatives who could potentially have specific and unreported knowledge of Native American cultural resources in the City, including the LADWP in-basin service area and setting for the Proposed Program. Pursuant to AB 52, LADWP has notified California Native American tribes known to be ancestrally affiliated with the location of the Proposed Program, and is conducting consultation with tribes that have requested such regarding specific knowledge of potential tribal cultural resources. The impact is potentially significant, and this issue will be further analyzed in the PEIR.

CONCLUSION: Impacts would be potentially significant for the Proposed Program. This issue will be further analyzed in the PEIR.

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?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

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?**

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Less than Significant Impact.

Development of new distributing substations would occur within the four identified study areas, including the Sun Valley Study Area, Silver Lake Study Area, Southeast Study Area, and Wilmington Study Area. Expansions would involve expanding the footprint of an existing substation and may require acquisition of one or more adjacent properties. Minor improvements at existing substations would be limited to the existing substation property. Other distribution system improvements could include, but not be limited to, upgrades to subtransmission lines and s, removal of existing pole-top transformer racks, deactivation of existing distributing substations, and other ancillary improvements, and would be located along existing road rights-of-way, existing utility easements, or at sites containing existing distribution system infrastructure. The existing substations and location of existing and proposed distribution system

infrastructure are in areas that are urban and primarily built out with various uses, including residential, commercial, open space, public facilities, industrial, and other uses.

Water Supplies

LADWP provides water service to the City as well as portions of Beverly Hills, Burbank, Calabasas, Culver City, Inglewood, Lomita, Lynwood, Santa Monica, West Hollywood, and unincorporated areas of the County of Los Angeles. As such, water for the Proposed Program would be supplied by LADWP. LADWP's water supply portfolio consists of four sources: water from the Los Angeles Aqueduct, purchased water from the Metropolitan Water District of Southern California (MWD), local groundwater, and recycled water. Two of the supply sources, Los Angeles Aqueduct water from the Eastern Sierra Nevada and water purchased from MWD, are classified as imported as they are obtained from outside LADWP's service area. MWD is the regional wholesale water agency, importing water from the Bay-Delta via the State Water Project and from the Colorado River via the Colorado River Aqueduct. Groundwater from local groundwater basins is obtained from wells within the LADWP service area from the San Fernando, Eagle Rock, Central, and West Coast Groundwater Basins.

The California Urban Water Management Planning Act requires that every urban water supplier, including LADWP, prepare and adopt an Urban Water Management Plan (UWMP) every five years. The main purposes of the UWMP are to forecast future water demands and available water supplies under various hydrologic scenarios, identify future water supply projects and programs, provide a reliability assessment for average, single dry year, and multi-dry years, and assess near term drought risk. According to the 2025 UWMP, LADWP water supply sources increasingly face multiple constraints including potential impacts of climate change, groundwater contamination, hydraulic variability, and reallocation of water for environmental concerns. To mitigate these impacts on supply sources, LADWP is diversifying its water supply portfolio through local groundwater investments, recycled water, stormwater capture, water conservation, and water use efficiency. According to LADWP's 2025 UWMP, the total annual water demand in LADWP's service area in fiscal year 2024-25 was approximately 475,900 acre-feet, which equates to approximately 155 billion gallons per year, or 425 million gallons per day. The 2025 UWMP projects that the total annual water demand in 2050 would be approximately 467,700 acre-feet, which equates to approximately 152.4 billion gallons per year, or 417 million gallons per day. Based on the LADWP's analysis, projected demands would be met by the available supplies under all hydrological scenarios through 2050.¹¹⁸

Construction activities for new distributing substations, expansions and minor improvements at existing substations, and other distribution system improvements would result in a temporary increase in water demand associated with activities such as earthwork and soil compaction, dust control, mixing and placement of concrete, equipment and site cleanup, and other related short-term activities. However, as construction activities are temporary in nature and would not require large amounts of water, impacts to water supply during construction activities for the Proposed Program would be less than significant.

Under the Proposed Program, the development of four new distributing substations and expansions of substations into adjacent properties would generate a new water demand or result in a net reduction in water demand on their respective sites, depending on whether the

¹¹⁸ Los Angeles Department of Water and Power. 2025 Urban Water Management Plan. February 2026. Available at: https://www.ladwp.com/sites/default/files/2026-06/LADWP%202025%20Urban%20Water%20Management%20Plan_Final.pdf.

existing site is vacant or occupied by more water-intensive uses that are proposed for removal. However, similar to existing substations, operation of a new distributing substation or expansion of a substation would not be inherently water intensive. Water demand from the development of four new distributing substations and expansions of existing substations would be associated with restroom use, safety systems, and landscaping. However, based on the typical water demand of substations, any new water demand from such proposed uses would be minimal. Additionally, new or expanded substations would incorporate high efficiency plumbing and water-efficient landscaping, where applicable, in compliance with LAMC Chapter IX, Article 9. Furthermore, water demand from personnel at substations would be minimal as LADWP's substations would be unmanned and remotely monitored via a SCADA system with occasional personnel visits for maintenance and system testing. As such, water demand from personnel would be negligible. For substations that undergo minor improvements, operational conditions would remain essentially the same as existing conditions such that the associated water demand of such improvements would be negligible. Similarly, other distribution system improvements could include upgrades to subtransmission lines and feeders, removal of existing pole-top transformer racks, deactivation of existing distributing substations, and other ancillary improvements that would not require the use of water during operations. Water demand under the Proposed Program would be nominal compared to the total annual demand generated in LADWP's service area.

Thus, the overall water demand from implementation of the Proposed Program would equate to a nominal, and insignificant fraction of the total annual demand generated in LADWP's service area. The uses at substations are not considered water-intensive and the demand associated with operation of the Proposed Program would be within the capacity of existing water supplies such that relocation or construction of new or expanded water facilities would not be required. Therefore, impacts related to water supply would be less than significant, and this issue will not be further analyzed in the PEIR.

Wastewater Treatment

The City of Los Angeles Bureau of Sanitation (LASAN) provides wastewater treatment to the City and operates four wastewater treatment facilities. Any wastewater generated from new or existing substations would be collected and conveyed to one of the four water reclamation plants, depending on their service area boundaries: Hyperion Water Reclamation Plant (HWRP), the Donald C. Tillman Water Reclamation Plant (DCTWRP), Los Angeles-Glendale Water Reclamation Plant (LAGWRP), and Terminal Island Water Reclamation Plant (TIWRP). These four water reclamation plants have a combined total capacity to treat over 580 million gallons of water per day (MGD). Table 3.19-1 lists the permitted treatment capacity and the average daily flow rate of each water reclamation plant that services the City. Under average daily dry weather conditions, HWRP has a treatment capacity of 450 MGD and flow of 250 MGD, DCTWRP has a treatment capacity of 80 MGD and flow of 45 MGD, LAGWRP has a capacity of 20 MGD and flow of 17 MGD, and TIWRP has a capacity of 30 MGD and flow of 16 MGD.¹¹⁹

¹¹⁹ Los Angeles Department of Water and Power. *Pure Water Los Angeles Master Plan, Table 2-2*. December 2024. Available at: <https://webprod.ladwp.com/sites/default/files/2025-03/PWLA%20Final%20Master%20Plan%20Report.pdf>.

Table 3.19-1: Capacity and Flow of Existing Water Reclamation Plants

Water Reclamation Plant	Average Dry Weather Flow Wastewater Treatment Capacity (MGD)	Current Average Dry Weather Flows (MGD)
Hyperion	450*	250
Donald C. Tillman	80	45
Los Angeles-Glendale	20	17
Terminal Island	30	16
Total	580	328

MGD = million gallons per day

* Peak wet weather flow capacity for Hyperion is 850 MGD.

Source: LADWP and LASAN. Pure Water Los Angeles Master Plan. Table 2-2. December 2024.

Available at: <https://www.ladwp.com/sites/default/files/2025-03/PWLA%20Final%20Master%20Plan%20Report.pdf>.

Wastewater associated with construction activities for new distributing substations, expansions and minor improvements at existing substations, and other distribution system improvements would be minimal as the main source of wastewater entering sewer systems would be generated from construction workers' use of restroom facilities. As such, construction activities would result in a relatively nominal and temporary increase in wastewater volumes. Therefore, impacts to wastewater treatment during construction activities for the Proposed Program would be less than significant.

Under the Proposed Program, the operation of new distributing substations would be similar to the operation of existing stations, and the operation of existing substations that are expanded or undergo minor improvements would be similar to existing operations. During operation, substations would be unmanned and remotely monitored via a SCADA system with occasional personnel visits to conduct maintenance and system testing. Wastewater from periodic restroom use, handwashing, maintenance activities, and system testing would be nominal compared to remaining capacity at existing wastewater treatment facilities. In addition, operation of other distribution system improvements would not result in an increase in wastewater volume after construction activities have concluded. Furthermore, LADWP would incorporate low-flow water features to reduce the amount of wastewater generated under the Proposed Program.

Therefore, the wastewater generation from implementation of the Proposed Program would represent a nominal percentage of the City's existing water treatment facilities permitted treatment capacity. As such, projects under the Proposed Program would not result in the need for new or expanded wastewater treatment facilities. Impacts related to wastewater facilities would be less than significant, and this issue will not be further analyzed in the PEIR.

Stormwater Drainage

Various agencies maintain easements over stormwater drainage facilities in the City, including the City's Bureau of Engineering, Los Angeles County Flood Control District, and U.S. Army Corps of Engineers. LADWP also manages stormwater capture facilities, which have the capacity to capture more than 83,000 acre-feet per year (more than 27 billion gallons) under average conditions. Stormwater runoff that cannot be contained at these facilities is discharged

to the Pacific Ocean via the City's rivers and storm drains.¹²⁰

Depending on the existing conditions of specific sites, the development of a new distributing substation or expansion could result in an increased percentage of impervious surfaces, and thus, an increased amount of stormwater runoff from a site. New development and expansions would be required to comply with the County's MS4 permit and City's stormwater pollution control measures (LAMC Chapter VI, Article 4.4) to treat, capture, and reduce the volume of stormwater flows to the maximum extent feasible. Depending on the amount of disturbance and impervious surfaces created by implementation of the new development, the project may be required to comply with the City's LID Ordinance (No. 188125), and undergo LID plan checks with LASAN, which would review specific project details such as hydrology calculations, BMP sizing documentation, and feasibility analyses to reduce the volume of stormwater flows to the maximum extent feasible. While new developments and expansions could increase impervious surface areas of their respective sites, a significant increase in the rate or amount of stormwater runoff that would require new storm water drainage facilities or expansion of existing facilities is not expected. All drainage flows would be routed through existing storm infrastructure and stormwater would continue to sheet flow towards the public storm drain.

Implementation of minor improvements are not anticipated to increase the amount of impervious surface areas or result in a substantial change in stormwater runoff from impervious surfaces when compared to existing conditions. However, minor improvements that include modifications for drainage would be required to comply with the City's stormwater pollution control measures (LAMC Chapter VI, Article 4.4) to treat, capture, and reduce the volume of stormwater flows to the maximum extent feasible. Therefore, once operational, the minor improvements would not alter the existing stormwater drainage of the respective sites or areas in a manner that would require new stormwater drainage facilities.

Other distribution system improvements are not expected to change stormwater drainage compared to existing conditions. Following the installation of subtransmission lines and feeders, work site streets and roadways would be restored, paved, and restriped, and no substantial change in drainage would occur when compared to existing conditions. Following the removal of existing pole-top transformer racks, any dismantled concrete or paved areas would be restored.

Therefore, new development, expansions, minor improvements, and other distribution system improvements would not require or result in the relocation or construction of new or expanded stormwater drainage facilities. Impacts related to stormwater drainage facilities would be less than significant, and this issue will not be further analyzed in the PEIR.

Electric Power

As discussed in Section 3.6, Energy, the Proposed Program aims to alleviate loads on existing substations, modernize aging distribution system infrastructure, meet the growing demand for electricity, and ensure the delivery of reliable power throughout the City. The new distributing substations, expansions, minor improvements to existing substations, and other distribution system improvements are needed to meet projected increases in electricity demand driven by increased population density within the LADWP in-basin service area, growth of energy-intensive industries, and the electrification of functions currently powered by the combustion of

¹²⁰ Los Angeles Department of Water and Power. *Stormwater Capture Master Plan*. August 2015. Available at: https://www.ladwp.com/sites/default/files/2023-08/LADWPStormwaterCaptureMasterPlan_MainReport_101615.pdf.

fossil fuels. Specifically, the need to develop new distributing substations within the four identified study areas is based, in part, on the inability to retrofit existing stations because it is not feasible or would not substantially alleviate projected capacity shortfalls in an area. Therefore, implementation of the four new distributing substations would serve to address overloads and increase grid capacity to meet future demand. Although each new distributing substation would increase electricity consumption associated with LADWP infrastructure operations by approximately 15,000 kWh annually, the resulting benefits are crucial to achieving the objectives of LADWP's 2022 Strategic Long-Term Resource Plan (SLTRP, now known as LA100 Plan) to transition the City away from reliance on the combustion of fossil fuels to satisfy growing regional energy demand. Implementation of expansions and minor improvements at existing substations as well as other distribution system improvements would increase the reliability and efficiency of LADWP's electrical infrastructure system. Such Program components would be consistent with the statewide mandates requiring the expansion of LADWP's renewable energy portfolio and would not preclude LADWP from pursuing its LA100 Plan initiatives.

Electricity would be required for the construction of new distributing substations, expansions, minor improvements at existing substations, and other distribution system improvements. During construction activities under the Proposed Program, temporary electric power for the operation of any necessary construction trailers and electrically powered tools and equipment would be provided through a connection to the LADWP grid. The amount of electricity used during construction would be temporary and minimal.

Future operation of the new distributing substations would require electricity for various purposes, such as the control house, HVAC, lighting, and operation of equipment. Specifically, the new distributing substations are forecasted to increase electricity consumption by approximately 15,000 kWh per year at each of the four locations, for a total of approximately 60,000 kWh or 60 MWh annually. For context, in fiscal year 2023-24, LADWP supplied more than 20,749 GWh of power. Thus, the incremental increase (0.0003 percent) from operation of four new distributing substations would not place a burden on the LADWP distribution network, and the new distributing substations would be implemented specifically to accommodate growth in systemwide demand in the future and alleviate loading on existing substations. While expansions, minor improvements to existing substations and other distribution system improvements could result in a minimal increase in electricity consumption, they would inherently be energy efficient by implementing measures such as LED lighting, optimizing building envelope thermal properties, managing water usage, and optimizing energy performance and controls.

Thus, implementation of the Proposed Program would not result in electricity demand such that new or expanded electric power generation facilities would be required. Therefore, impacts related to electric power generation facilities would be less than significant, and this issue will not be further analyzed in the PEIR.

Natural Gas

As discussed in Section 3.6, Energy, fuels used for construction would primarily consist of diesel and gasoline. Natural gas use is not anticipated during construction activities for new development, expansions, minor improvements, or other distribution systems improvements. Any consumption of natural gas during construction would be negligible and would not place a significant drain on natural gas resources. Additionally, the operation of new distributing substations, existing substations that are expanded or undergo minor improvements, and other

distribution system improvements would not involve the use of natural gas nor require use of natural gas for inspection and maintenance activities. The City is actively phasing out natural gas use, consistent with the goals of CARB's 2022 Scoping Plan and statewide initiatives to ban natural gas appliances after 2030. Therefore, the Proposed Program would not result in an increased demand for natural gas such that new or expanded natural gas facilities would be required. Impacts related to natural gas facilities would be less than significant, and this issue will not be further analyzed in the PEIR.

Telecommunications

As discussed in Section 1.5.3, other ancillary improvements to the distribution system would be undertaken to improve system reliability, optimize operations, and enhance safety. These activities would occur concurrently with the construction of new distributing substations and improvements to existing substations. For example, in locations where new or expanded underground subtransmission lines or feeders are required, fiber or wireless communication network lines may also be installed to facilitate automation, telemetry, and protection coordination. However, construction and operation of each component under the Proposed Program would not require new or expanded telecommunications facilities as the components would occur in developed, urban areas that have adequate telecommunications facilities that the existing fiber or wireless communication network lines could connect to. Therefore, the Proposed Program would not require or result in the relocation or construction of new or expanded telecommunication facilities. Impacts related to telecommunication facilities would be less than significant, and this issue will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

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?

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Less than Significant Impact. LADWP's 2025 UWMP details how LADWP plans to meet all the City's water supply goals and objectives while serving customers' projected water needs and uses a demand forecast model to project demands over a 25-year planning horizon, through 2050. The 2025 UWMP shows that LADWP has sufficient supply to meet expected water demands through 2050 under single dry year, average weather year, and three consecutive dry years. As discussed in Section 3.19(a) above, construction for new development, expansions, minor improvements and other distribution system improvements would result in a temporary increase in water demand associated with activities such as earthwork and soil compaction, dust control, mixing and placement of concrete, equipment and site cleanup, and other related short-term activities. Construction activities are temporary in nature and would not require large amounts of water. Water usage during project construction would be nominal and accommodated by LADWP's available water supplies.

During operation, substations would be unmanned and remotely monitored with occasional personnel visits for inspection and maintenance activities. New development and expansions could increase water consumption compared to existing onsite uses, depending on whether the existing site is vacant or occupied by more water-intensive uses that are proposed for removal.

However, water use would be minimal and associated with restroom use, safety systems, and landscaping. Additionally, new or expanded substations would incorporate high efficiency plumbing and water-efficient landscaping, where applicable, in compliance with LAMC Chapter IX, Article 9. For substations that undergo minor improvements, operational conditions would remain essentially the same as existing conditions such that the associated water demand of such improvements would be negligible. Operation of other distribution system improvements which could include, but not be limited to, upgrades to subtransmission lines and feeders, removal of existing pole-top transformer racks, deactivation of existing distributing substations, and other ancillary improvements, would not result in new or increased water demand. Thus, water demand under the Proposed Program would be nominal compared to the total annual demand generated in LADWP's service area. Therefore, sufficient water supplies would be available to serve the Proposed Program and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant, and this issue will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

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?

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Less than Significant Impact. The Proposed Program proposes the development of four new distributing substations, expansions of existing substations, minor improvements, and other distribution system improvements. As discussed in Section 3.19(a) above, construction activities for new distributing substations, expansions and minor improvements at existing substations, and other distribution system improvements would result in a temporary increase in wastewater volumes which would be collected and conveyed to one of the City's four water reclamation plants: HWRP, DCTWRP, LAGWRP, or TIWRP. The City's existing water treatment facilities have a combined permitted average dry weather treatment capacity of 580 MGD and an average dry weather daily flow of approximately 328 MGD. The Proposed Program's wastewater generation would represent a nominal percentage of the City's existing water treatment facilities permitted treatment capacity.

Under the Proposed Program, the operation of new distributing substations would be similar to the operation of existing stations, and the operation of existing substations that are expanded or undergo minor improvements would be similar to existing operations. During operation, substations would be unmanned and remotely monitored via a SCADA system with occasional personnel visits to conduct maintenance and system testing. Wastewater from periodic restroom use, handwashing, maintenance activities, and system testing would be nominal compared to remaining capacity at existing wastewater treatment facilities. In addition, operation of other distribution system improvements would not result in an increase in wastewater volume after construction activities have concluded.

As such, there is adequate capacity to serve the projected demand associated with implementation of the Proposed Program in addition to existing commitments. Therefore, impacts would be less than significant, and this issue will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

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?

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Less than Significant Impact The Proposed Program proposes the development of four new distributing substations, expansions of existing substations, minor improvements, and other distribution system improvements. Construction of each component under the Proposed Program could involve demolition of existing buildings and removal of existing equipment, which could generate solid waste in the form of excavated material, demolition debris, and general construction waste such as packaging, scrap, and other debris. The Proposed Program would incorporate source reduction techniques and recycling measures in accordance with the Citywide Construction and Demolition (C&D) Waste Recycling Ordinance, which requires all mixed C&D waste generated within city limits to be taken to City certified C&D waste processors, and would reduce the amount of construction-generated solid waste that would require disposal in landfills.¹²¹

As discussed in Section 3.9, Hazards and Hazardous Materials, construction of projects under the Proposed Program could involve demolition of existing buildings, removal of existing equipment, and potential removal of buildings or equipment with ACM, LBP, PCB-containing materials, and/or other hazardous materials. If encountered, ACM, LBP, and PCB-containing materials would be removed and remediated in accordance with all applicable federal and state regulations regarding the disturbance, handling, and disposal of debris. All hazardous waste would be sent to State licensed treatment, storage, and disposal facilities that have been approved to accept such wastes. The disposal and recycling of wastes would strictly comply with all local, state, and federal laws, rules, and regulations concerning the disposal of all waste substances. Any non-recyclable and hazardous construction waste generated would be disposed of at a landfill approved to accept such materials. During the course of construction, the contractor would haul solid waste to a landfill that is still active and has remaining capacity.

Inert waste (such as concrete, asphalt, and other construction waste) is disposed of at permitted inert waste landfills and other accepting landfills, while non-hazardous solid waste is disposed of at Class III landfills. As shown in Table 3.19-2, the estimated remaining capacity of the Azusa Land Reclamation Landfill, which is the only permitted inert landfill within the County, has an estimated remaining life of 22 years and remaining capacity of 44.8 million tons, as of December 31, 2023 (the most recently available data).^{122, 123} The estimated total remaining

¹²¹ Los Angeles Sanitation and Environment. Construction & Demolition Waste Recycling Ordinance. Available at: https://cityclerk.lacity.org/online/docs/2009/09-3029_ord_181519.pdf, accessed June 3, 2026.

¹²² Los Angeles County, Department of Public Works. *Countywide Disposal Rate and Assessment of Disposal Capacity 2023 Report*. 2023. Available at: <https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=18153&hp=yes&type=PDF>.

¹²³ Los Angeles County, Department of Public Works. *Countywide Disposal Rate and Assessment of Disposal Capacity 2023 Report*. 2023. Available at: <https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=18153&hp=yes&type=PDF>

capacity of County Class III landfills that serve the City, some of which accept non-hazardous construction waste, is approximately 78.96 million tons, as of December 31, 2023 (the most recently available data).^{124, 125} It is estimated that construction of a new distributing substation could generate approximately 200 tons of waste with the incorporation of source reduction techniques and recycling measures in accordance with the Citywide C&D Waste Recycling Ordinance; therefore, construction of four new distributing substations would generate a total of less than 1,000 tons of waste through the horizon year 2045. Expansions, minor improvements, and other distribution system improvements would also generate construction waste, at a similar or smaller scale than for a new distributing substation. Therefore, the volume of waste generated during construction and operations of the Proposed Program would be nominal when compared to the remaining capacity of the County of Los Angeles landfills serving the City.

**Table 3.19-2: Existing Solid Waste Disposal Facilities in Los Angeles
County Serving City of Los Angeles**

Facility	Remaining Life^a (years)	Estimated Remaining Permitted Capacity (million tons)^b
Permitted Inert Waste Facility		
Azusa Land Reclamation Landfill	22	44.80 million tons
Total		44.80 million tons
Class III Solid Waste Facility		
Antelope Valley Landfill	7	7.79
Burbank Landfill	30	3.94
Lancaster Landfill	18	10.79
Sunshine Canyon Landfill	14	53.01
Total		75.53 million tons

^a Remaining life is based on either the 2023 average daily disposal tonnage, maximum permitted capacity, or the facility's permit expiration date.

^b As of December 31, 2023 (the most recently available data).

Source: Los Angeles County Department of Public Works. Countywide Disposal Rate and Assessment of Disposal Capacity 2023 Report. Available at:

<https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=18153&hp=yes&type=PDF>

LADWP would also comply with solid waste diversion, reduction, and recycling mandates during operation. Under the Proposed Program, the operation of new distributing substations would be similar to the operation of existing stations, and the operation of existing substations that are expanded or undergo minor improvements would be similar to existing operations. During operation, the substations would be unmanned, remotely monitored via a SCADA system, and undergo occasional inspection, maintenance, or testing visits by personnel. Operation of other distribution system improvements would not generate solid waste once construction activities have concluded. As such, implementation of the Proposed Program would not be expected to substantially increase the amount of solid waste generation on-site as the substations would primarily be operated remotely and a nominal amount of waste from maintenance visits would be generated.

Therefore, the Proposed Program would not generate excess solid waste such that the capacity

¹²⁴ To provide a conservative analysis, out-of-County landfills serving the City of Los Angeles are not included.

¹²⁵ Los Angeles County, Department of Public Works. *Countywide Disposal Rate and Assessment of Disposal Capacity 2023 Report*. 2023. Available at: <https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=18153&hp=yes&type=PDF>

of area landfills would be exceeded or that the attainment of waste reduction goals would be impaired. Impacts would be less than significant, and this issue will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

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

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Less than Significant Impact. The Proposed Program proposes the development of four new distributing substations, expansions of existing substations, minor improvements, and other distribution system improvements. As discussed in Section 3.9(d) above, construction of such projects could involve demolition of existing buildings and removal of existing equipment. Solid waste in the form of excavated material, demolition debris, and general construction waste such as packaging, scrap, and other debris associated with construction activities under the Proposed Program would be disposed of in accordance with solid waste management and reduction with and statutes and regulations, including the City's C&D Waste Recycling Ordinance and the Los Angeles Countywide Integrated Waste Management Plan. Additionally, if hazardous waste is encountered during potential demolition activities, materials would be removed and remediated in accordance with all applicable federal and state regulations regarding the disturbance, handling, and disposal of debris, as further discussed in Section 3.9(a).

Under the Proposed Program, the operation of new distributing substations would be similar to the operation of existing stations, and the operation of existing substations that are expanded or undergo minor improvements would be similar to existing operations. During operation, substations would be unmanned and remotely monitored via a SCADA system. While personnel visits for maintenance and system testing would occur occasionally, any solid waste generated during operations would be recycled or disposed of in accordance with local, state, and federal statutes and regulations. Solid waste associated with other distribution system improvements would not be generated after construction activities have concluded. Therefore, impacts would be less than significant, and this issue will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

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?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☒	☐	☐	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☒	☐	☐	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

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?

The City of Los Angeles Emergency Management Department coordinates evacuations in the case of emergency with the LAPD, LAFD, and the County of Los Angeles, as outlined in the City's Emergency Operations Plan.¹²⁶ The County of Los Angeles also designates disaster routes within the County. Additionally, the LADWP Office of Emergency Management coordinates with all other City departments for emergency response. Within the City, LAFD oversees direct communication with LA County Fire Department and Cal Fire for wildfire events, and the LADWP Office of Emergency Management acts as a liaison with LAFD.¹²⁷

New Development

Less Than Significant Impact. Development of new distributing substations would occur within the four identified study areas, including the Sun Valley Study Area, Silver Lake Study Area, Southeast Study Area, and Wilmington Study Area. None of the study areas are located within a State Responsibility Area. The area east of San Fernando Road in the Sun Valley Study Area and the approximately northeast quadrant of the Silver Lake Study Area are within Very High Fire Hazard Severity Zones; the Wilmington Study Area near the Harbor Sports Park is near a

¹²⁶ City of Los Angeles, Emergency Management Department. *City of Los Angeles Base Emergency Operations Plan*. 2023. Available at: https://emergency.lacity.gov/sites/g/files/wph1791/files/2023-10/Emergency%20Operations%20Base%20Plan_2023.pdf.

¹²⁷ Los Angeles Department of Water and Power. *2025 Wildfire Mitigation Plan*. June 2025. Available at: <https://www.ladwp.com/sites/default/files/2025-07/LADWP%202025%20Wildfire%20Mitigation%20Plan.pdf>.

High Fire Hazard Severity Zone.¹²⁸ As previously discussed, temporary lane closures may be required during construction of new distributing substations. Accordingly, sitespecific traffic control plans would be prepared for review and approval by LADOT prior to construction of each distributing substation and would include measures such as signage, flag persons, lane detours, and coordination with or notification for emergency providers, as necessary, to minimize disruptions to traffic and maintain emergency access throughout construction activities. The potential wildfire risks related to lane closures would be temporary during construction, minimized through the requirements of a traffic control plan, and would cease upon the completion of the new distributing substations. During operation, the new distributing substations would be unmanned and remotely monitored via a SCADA system, while personnel visits for maintenance and system testing would occur occasionally and would not generate additional traffic trips that could interfere with emergency access. Furthermore, the new distributing substations would be designed in accordance with LADOT requirements for emergency ingress/egress to ensure safety and visibility for roadway users during operation. Therefore, new development would not substantially impair an adopted emergency response plan or emergency evacuation plan, and the impact would be less than significant. This issue related to new development will not be further analyzed in the PEIR.

Expansions

Less Than Significant Impact. Expansions would involve expanding the footprint of an existing substation and may require acquisition of one or more adjacent properties. None of the substations located in the City are within a State Responsibility Area; however, the existing substations close to the northern and northwestern edges of the City boundaries are located near Very High Fire Hazard Severity Zones in a State Responsibility Area. Approximately one-quarter of existing substations are located in or near (i.e., within 0.25 miles) areas designated as Very High Fire Hazard Severity Zones within a Local Responsibility Area. Both expansions that would occur within an existing substation property and those that would expand into adjacent parcels may require temporary traffic lane closures during construction. Accordingly, a site-specific traffic control plan would be prepared for review and approval by LADOT prior to construction and would include measures to minimize disruptions to traffic and maintain emergency access. The potential wildfire risks related to lane closures would be temporary during construction, minimized through the requirements of a traffic control plan, and would cease upon the completion of the new distributing substations. During operation, similar to existing conditions, substations would be unmanned and remotely monitored via a SCADA system, while personnel visits for maintenance and system testing would occur occasionally and would not generate additional traffic trips that could interfere with emergency response or access. Furthermore, expansions would be designed in accordance with LADOT requirements for emergency ingress/egress to ensure safety and visibility for roadway users during operation. Therefore, expansions would not substantially impair an adopted emergency response plan or emergency evacuation plan, and the impact would be less than significant. This issue related to expansions will not be further analyzed in the PEIR.

Minor Improvements

Less Than Significant Impact. Minor improvements at existing substations would be limited to

¹²⁸ California Department of Forestry and Fire Protection (CalFire). Fire Hazard Severity Zone Viewer. Available at: <https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones>, accessed January 23, 2026.

the existing station footprint and would not extend into adjacent properties. As such, these improvements would not require lane closures that could impact public roads nor impair an emergency response or evacuation plan. During operation, existing substations would continue to be unmanned and would not generate additional traffic trips that could interfere with emergency response or access. Therefore, no impact would occur and this issue related to minor improvements will not be further analyzed in the PEIR.

Other Distribution System Improvements

Less Than Significant Impact. Other distribution system improvements could include, but not be limited to, upgrades to subtransmission lines and feeders, removal of existing pole-top transformer racks, deactivation of existing distributing substations, and other ancillary improvements. These improvements could occur within or near areas designated as Very High Fire Hazard Severity Zones. New subtransmission lines and feeders would be installed underground within existing road rights-of-way or utility easements. Specifically, during construction of other distribution system improvements that would require the installation of the subtransmission lines and/or feeders within existing road rights-of-way, construction activities would typically occur within an approximately 800- to 1,000-foot work area, within traffic lanes. As such, rolling partial lane closures would be required for installation of conduit for which traffic control plans would be prepared for review and approval by LADOT prior to construction. The plans would include measures to minimize disruptions to traffic and maintain emergency access. Following installation of the proposed subtransmission lines and feeders, the roadways would be returned to their existing condition. The potential wildfire risks related to lane closures would be temporary during construction, minimized through the requirements of a traffic control plan, and would cease upon the completion of the new or improved subtransmission lines and/or feeders. As utility easements would be located outside rights-of-way, installation of the new underground subtransmission lines and feeders within the easements would not affect emergency access and routes. Such areas would also be restored to pre-construction conditions upon completion of construction. Therefore, other distribution system improvements would not substantially impair an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant, and this issue related to other distribution systems improvements will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

- 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?**

In compliance with state law, LADWP prepares annual updates to its Wildfire Mitigation Plan, which are submitted to the California Office of Energy Infrastructure Safety for review and approval.¹²⁹ The Wildfire Mitigation Plan identifies strategies to prevent, mitigate, and respond to wildfire risks associated with LADWP's electrical infrastructure.¹³⁰ The 2026 LADWP Wildfire

¹²⁹ California Public Utilities Commission. Wildfire and Wildfire Safety. Available at: <https://www.cpuc.ca.gov/industries-and-topics/wildfires>, accessed January 23, 2026.

¹³⁰ Los Angeles Department of Water and Power. 2025 Wildfire Mitigation Plan. June 2025. Available at: <https://www.ladwp.com/sites/default/files/2025-07/LADWP%202025%20Wildfire%20Mitigation%20Plan.pdf>.

Mitigation Plan is currently in development. As such, the most recent plan available is the 2025 LADWP Wildfire Mitigation Plan.

As stated in the Wildfire Mitigation Plan, the potential for wildfire exists throughout California, including parts of the City. The terrain, climate, and vegetation present in Southern California can create wildland fire hazards in areas near or around LADWP facilities and other structures. Hot summers without rain and low humidity can create long periods of high fire danger. The main factors considered are as follows: terrain and the accessibility for first responders to react to an incident, vegetation type and density, extended drought conditions, current weather conditions, and changing weather patterns (climate change).¹³¹ LADWP's Wildfire Mitigation Plan includes an overview of the fire prevention design and construction features for electrical equipment and facilities, which either meet or exceed state, federal, and industry standards. These features include maintaining defensible space around facilities through vegetation management; using non-flammable pole materials, such as ductile iron, steel, and concrete; using larger conductors and fiberglass arms; increasing conductor spacing; replacing low voltage bare conductors with insulated conductors; and increasing pole loads to sustain higher wind pressure in high wind areas.¹³² Additionally, all construction and maintenance activities are conducted with fire suppression equipment, and each substation prepares and maintains a site-specific emergency response plan, which includes fire safety and reporting protocols. When working in fire hazard zones, LADWP requires a fire extinguisher and other fire suppression equipment, clearance of vegetation within a 10-foot radius of poles, and parking and idling of vehicles or equipment over dry brush is prohibited. Additionally, LADWP's Wildfire Mitigation Plan outlines further restrictions on activities during red flag days when wildfire risk is increased.

New Development

Potentially Significant Impact. Development of new distributing substations would occur within the four identified study areas, including the Sun Valley Study Area, Silver Lake Study Area, Southeast Study Area, and Wilmington Study Area. As discussed, portions of the study areas are located within and near areas designated as Very High Fire Hazard Severity Zones. The study areas are predominantly built out and highly disturbed. Thus, vegetation type and density is generally not a critical concern for wildfire risk associated with the development of a new distributing substation. Additionally, LADWP regularly surveys its service territory, conducts vegetation management, and would continue to do so for the new distributing substations as necessary.

The 2025 LADWP Wildfire Mitigation Plan maps areas susceptible to high winds. Some portions of the Silver Lake Study Area contain steep slopes that could exacerbate wildfire risks, and portions of the Sun Valley Study Area and the Silver Lake Study Area are located within High Wind Areas.¹³³ LADWP identifies construction standards and operational protocols to reduce risk of wildfire during high wind events by limiting or prohibiting certain activities. Nonetheless, construction of new distributing substations in hillside areas and/or High Wind Areas could exacerbate wildfire risk. The impact is considered potentially significant and this issue related to

¹³¹ Los Angeles Department of Water and Power. *2025 Wildfire Mitigation Plan*. June 2025. Available at: <https://www.ladwp.com/sites/default/files/2025-07/LADWP%202025%20Wildfire%20Mitigation%20Plan.pdf>.

¹³² Los Angeles Department of Water and Power. *2025 Wildfire Mitigation Plan*. June 2025. Available at: <https://www.ladwp.com/sites/default/files/2025-07/LADWP%202025%20Wildfire%20Mitigation%20Plan.pdf>.

¹³³ Los Angeles Department of Water and Power. *2025 Wildfire Mitigation Plan, Fire Threat Map*. June 2025. <https://www.ladwp.com/sites/default/files/2025-07/LADWP%202025%20Wildfire%20Mitigation%20Plan.pdf>.

new development will be further analyzed in the PEIR.

Expansions

Potentially Significant Impact. Expansions would involve expanding the footprint of an existing substation and may require acquisition of one or more adjacent properties. Expansions into parcels adjacent to existing substation properties would be generally similar to development of new stations. As previously discussed, the existing substations close to the northern and northwestern edges of the City boundaries are located near Very High Fire Hazard Severity Zones in a State Responsibility Area, and approximately one-quarter of existing substations are located in or near (i.e., within 0.25 miles) areas designated as Very High Fire Hazard Severity Zones within a Local Responsibility Area. Some existing substations are located near hillside areas, and the 2025 LADWP Wildfire Mitigation Plan identifies High Wind Areas primarily in the northern portion of the City; other High Wind Areas within the City include the Santa Monica Mountains, the Kenneth Hahn State Recreation area, the area south of Marina del Rey, the western boundary of San Pedro, and the Terminal Island area of the Port of Los Angeles.¹³⁴ As such, expansions in these areas could be susceptible to wildfire during high wind events. The impact is considered potentially significant and this issue related to expansions will be further analyzed in the PEIR.

Minor Improvements

Less Than Significant Impact. As previously discussed, some existing substations are located near hillside areas, and the 2025 LADWP Wildfire Mitigation Plan identifies High Wind Areas in portions of the City.¹³⁵ Minor improvements to existing substations could include upgrades to modernize and replace equipment, adding equipment at vacant positions, and improvements to substation security and protection. Such minor improvements would require minimal construction and/or ground disturbance, would occur within the boundaries of the existing property, and thus, would not exacerbate wildfire risks at existing substations. Minor improvements would be required to adhere to the design and construction standards and operational protocols in the LADWP Wildfire Mitigation Plan. Additionally, during operation, minor improvements at existing substations would provide beneficial impacts as they would modernize equipment and add electrical equipment for grounding and fire protection, which would improve fire safety. With compliance with the latest LADWP Wildfire Mitigation Plan, minor improvements would not exacerbate wildfire risks that could expose project occupants to pollutant concentrations from a wildfire. The impact would be less than significant and this issue related to minor improvements at existing substations will not be further analyzed in the PEIR.

Other Distribution System Improvements

Potentially Significant Impact. Other distribution system improvements could include, but not be limited to, upgrades to subtransmission lines and feeders, removal of pole-top transformer racks, deactivation of existing distributing substations, and other ancillary improvements. These improvements could occur within or near areas designated as Very High Fire Hazard Severity Zones. Implementation of improvements in these areas could increase risk of wildfire during high wind events, in hillside areas, and/or in areas containing dense vegetation. Similar to new

¹³⁴ Los Angeles Department of Water and Power. 2025 Wildfire Mitigation Plan, Fire Threat Map. June 2025. <https://www.ladwp.com/sites/default/files/2025-07/LADWP%202025%20Wildfire%20Mitigation%20Plan.pdf>.

¹³⁵ Los Angeles Department of Water and Power. 2025 Wildfire Mitigation Plan, Fire Threat Map. June 2025. <https://www.ladwp.com/sites/default/files/2025-07/LADWP%202025%20Wildfire%20Mitigation%20Plan.pdf>.

development, other distribution system improvements would be required to adhere to the design and construction standards and operational protocols in the LADWP Wildfire Mitigation Plan. Nonetheless, construction of other distribution system improvements in hillside areas and/or High Wind Areas could exacerbate wildfire risk. The impact is considered potentially significant and this issue related to other distribution system improvements will be further analyzed in the PEIR.

CONCLUSION: Impacts would be potentially significant for new development, expansions, and other distribution system improvements. This issue for new development, expansions, and other distribution system improvements will be further analyzed in the PEIR. Impacts related to minor improvements would be less than significant, and therefore, will not be further analyzed in the PEIR.

- 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?**

New Development

Potentially Significant Impact. Development of new distributing substations would occur within the four identified study areas, including the Sun Valley Study Area, Silver Lake Study Area, Southeast Study Area, and Wilmington Study Area. As discussed above, portions of the study areas are located within and near areas designated as Very High Fire Hazard Severity Zones. New development would include the installation and maintenance of electrical equipment, power lines, and related infrastructure. Standard equipment installed at each new distributing substation would include busbars, circuit breakers, transformers, feeders, capacitor banks, voltage regulators, HVAC units, and a control house. LADWP identifies construction standards and operational protocols to reduce risk of wildfire. Nonetheless, construction and operation of new distributing substations could exacerbate wildfire risk. The impact is considered potentially significant and this issue related to new development will be further analyzed in the PEIR.

Expansions

Potentially Significant Impact. Expansions would involve expanding the footprint of an existing substation and may require acquisition of one or more adjacent properties. Expansions into parcels adjacent to existing substation properties would be generally similar to development of new stations. As previously discussed, several existing substations are located in or near areas designated as Very High Fire Hazard Severity Zones. Similar to new development, expansions would be required to adhere to the design and construction standards and operational protocols in the LADWP Wildfire Mitigation Plan. Nonetheless, construction and operation of expansions could exacerbate wildfire risk. The impact is considered potentially significant and this issue related to new development will be further analyzed in the PEIR.

Minor Improvements

Less Than Significant Impact. Minor improvements to existing substations could include upgrades to modernize and replace equipment, add equipment at vacant positions, and improve physical protection and substation security. Equipment may include, but is not limited to, transformer banks, circuit breakers, switchgears, cables, conductors, buses, capacitor banks,

battery systems, voltage regulators, protection and control equipment, and other ancillary equipment. Such minor improvements would require minimal construction and/or ground disturbance and would occur within the boundaries of the existing property. Occasionally, shallow trenching would be required to connect the new equipment to the existing lines within the substation. As previously discussed, several existing substations are located in or near areas designated as Very High Fire Hazard Severity Zones. Construction of minor improvements would be required to adhere to the design and construction standards outlined in the LADWP Wildfire Mitigation Plan. During operation, modernization and replacement of outdated equipment would inherently reduce fire risk at the substation where such improvement would occur. With compliance with the LADWP Wildfire Mitigation Plan, minor improvements would not exacerbate wildfire risks. Therefore, impacts would be less than significant, and this issue related to minor improvements at existing substations will not be further analyzed in the PEIR.

Other Distribution System Improvements

Potentially Significant Impact. Other distribution system improvements would include, but not be limited to, upgrades to subtransmission lines and feeders, removal of existing pole-top transformer racks, deactivation of existing distributing substations, and other ancillary improvements. These improvements could occur within or near areas designated as Very High Fire Hazard Severity Zones. Similar to new development, other distribution system improvements would be required to adhere to the design and construction standards and operational protocols in the LADWP Wildfire Mitigation Plan. Additionally, subtransmission lines and feeders would be installed underground within existing road rights-of-way or utility easements, which would minimize the risk of wildfire during operation. Nonetheless, construction of other distribution system improvements, including installation of subtransmission lines and feeders, could exacerbate wildfire risk. The impact is considered potentially significant and this issue related to other distribution system improvements will be further analyzed in the PEIR.

CONCLUSION: Impacts would be potentially significant for new development, expansions, and other distribution system improvements. This issue for new development, expansions, and other distribution system improvements will be further analyzed in the PEIR. Impacts related to minor improvements would be less than significant, and therefore, will not be further analyzed in the PEIR.

- 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?**

New Development

Less Than Significant Impact. The development of new distributing substations would occur within the four identified study areas, including the Sun Valley Study Area, Silver Lake Study Area, Southeast Study Area, and Wilmington Study Area. Portions of the Study Areas are located within and near areas designated as Very High Fire Hazard Severity Zones. As discussed in Section 3.7(a)(iv), the Southeast Study Area and Wilmington Study Area do not contain identified landslide zones while the Sun Valley Study Area and Silver Lake Study Area

contain identified landslide zones.^{136, 137} However, LADWP would not construct new distributing substations within identified landslide zones in the Sun Valley Study Area and Silver Lake Study Area. Nonetheless, as previously discussed, some portions of the Silver Lake Study Area contain slopes in designated hillside areas that could be exposed to flooding. As discussed in Section 3.10(c), during construction, site grading and excavation activities could expose soils to erosion. However, specific projects may be subject to the Construction General Permit or the requirements of the LADBS grading and building permits, which would require the preparation of an erosion control plan and site-specific BMPs to control runoff during construction. Following completion of construction activities, sites containing new distributing substations would be predominantly impervious. New development projects would be required to comply with the County's MS4 permit and City's stormwater pollution control measures (LAMC Chapter VI, Article 4.4) to treat, capture, and reduce the volume of stormwater flows to the maximum extent feasible. Depending on the amount of disturbance and impervious surfaces created by implementation of the new development, the project may be required to comply with the City's LID Ordinance (No. 188125), and undergo LID plan checks with LASAN, which would review specific project details such as hydrology calculations, BMP sizing documentation, and feasibility analyses. Therefore, with adherence to existing regulatory requirements, new development would not expose people or structures to significant risks associated with runoff, slope instability, or drainage changes. The impact would be less than significant and this issue related to new development will not be further analyzed in the PEIR.

Expansions

Less Than Significant Impact. Expansions would involve expanding the footprint of an existing substation and may require acquisition of one or more adjacent properties. As previously discussed, several existing substations are located in or near areas designated as Very High Fire Hazard Severity Zones. Expansions into parcels adjacent to existing substation properties would be generally similar to development of new stations. Similar to new development, construction activities for expansions could expose soils to erosion. However, any expansion that would disturb more than one-acre would be required to prepare and implement a SWPPP. If construction activities would not disturb more than one-acre, construction's grading activities would be subject to the requirements of the LADBS grading and building permits, which would require implementation of measures and standards, such as the preparation of an erosion control plan and site-specific BMPs, designed to limit potential impacts associated with sedimentation and erosion to acceptable levels. Following completion of construction activities, sites containing expansions would be predominantly impervious. Similar to new development, expansions would be required to comply with the County's MS4 permit and City's stormwater pollution control measures (LAMC Chapter VI, Article 4.4) to treat, capture, and reduce the volume of stormwater flows to the maximum extent feasible. Depending on the amount of disturbance and impervious surfaces created by implementation of the new development, the project may be required to comply with the City's LID Ordinance (No. 188125), and undergo LID plan checks with LASAN, which would review specific project details such as hydrology calculations, BMP sizing documentation, and feasibility analyses. Therefore, with adherence to existing regulatory requirements, expansions would not expose people or structures to

¹³⁶ California Department of Conservation, California Geological Survey. Earthquake Zones of Required Investigation. Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/>, accessed December 2025.

¹³⁷ California Department of Conservation, California Geological Survey. Earthquake Zones of Required Investigation. Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/>, accessed December 2025.

significant risks associated with runoff, slope instability, or drainage changes. The impact would be less than significant and this issue related to expansions will not be further analyzed in the PEIR.

Minor Improvements

Less Than Significant Impact. Minor improvements at existing substations would be limited to the existing station property and would not extend into adjacent properties. Minor improvements could include, amongst other activities, the installation of a perimeter wall for security purposes and construction of drainage features to improve drainage. As previously discussed, several existing substations are located in or near areas designated as Very High Fire Hazard Severity Zones. However, as minor improvements would be implemented within an existing substation property, these activities would not be anticipated to significantly change the drainage patterns around the substation such that the people or structures would be exposed to significant risks as a result of runoff, post-fire slope instability, or drainage changes. Therefore, impacts would be less than significant, and this issue related to minor improvements at existing substations will not be further analyzed in the PEIR.

Other Distribution System Improvements

Less Than Significant Impact. Other distribution system improvements would include, but not be limited to, upgrades to subtransmission lines and feeders, removal of existing pole-top transformer racks, deactivation of existing distributing substations, and other ancillary improvements. These improvements could occur within or near areas designated as Very High Fire Hazard Severity Zones. Installation of subtransmission lines and feeders would be located underground within existing road rights-of-way or utility easements. Installation of these lines would require trenching, which could expose soils to erosion. However, a SWPPP and/or erosion control plan would be implemented for runoff control during construction. Following installation of these lines, the roadways and utility easements would be returned to their existing conditions and drainage patterns would remain unchanged. Other ancillary improvements would occur concurrently with other distribution system improvements at sites containing existing distribution system infrastructure and would not change drainage patterns at a site. Removal of existing pole-top transformer racks would involve removing poles and filling those holes, and deactivation of existing distributing substations would not involve any activities that could change drainage patterns. Therefore, with adherence to applicable regulations, other distribution system improvements would not expose people or structures to significant risks associated with runoff, post-fire instability, or drainage changes. Impacts would be less than significant, and this issue related to other distribution system improvements will not be further analyzed in the PEIR.

CONCLUSION: Less than significant impacts would occur related to new development, expansions, minor improvements, and other distribution system improvements. This issue will not be further analyzed in the PEIR.

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?	☒	☐	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☒	☐	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

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?

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Potentially Significant Impact. As discussed throughout Chapter 3, the Proposed Program could have the potential to substantially degrade the quality of the environment. Specifically, as discussed in Section 3.4, Biological Resources, the new development, expansions, and other distribution system improvements could 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 substantially reduce the number or restrict the range of a rare or endangered plant or animal. Impacts of new development, expansions, and other distribution system improvements related to biological resources will be further analyzed in the PEIR.

Minor improvements would be limited to existing substation properties, and thus 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 substantially reduce the number or restrict the range of a rare or endangered plant or animal.

As discussed in Section 3.5, Cultural Resources, and Section 3.18, Tribal Cultural Resources, the Proposed Program may impact built historical resources and would include ground-disturbing activities that have the potential to impact unknown archaeological and tribal cultural resources. Therefore, the Proposed Program has the potential to eliminate important examples of the major periods of California history or prehistory. This issue would be potentially significant and will be further analyzed in the PEIR.

- 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)?**

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Potentially Significant Impact. The Proposed Program includes planned improvements to the LADWP distribution system through the planning horizon year 2045. The Proposed Program includes construction of four new distributing substations, expansion of existing substations, minor improvements to existing substations, and other distribution system improvements. For the most part, these projects would be constructed throughout the City either in the four Study Areas for new development or adjacent to or within an existing substation, and could result in cumulatively considerable impacts. As such, while impacts would be localized, the Proposed Program may make a cumulatively considerable contribution to potentially significant impacts caused by the combined effects of the Proposed Program and the impacts of other projects that are closely related geographically (i.e., within the same vicinity or greater region, depending on the nature and scope of the specific 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). Therefore, the impact is potentially significant, and this issue will be further analyzed in the PEIR.

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

New Development, Expansions, Minor Improvements, and Other Distribution System Improvements

Potentially Significant Impact. As discussed throughout Chapter 3, the Proposed Program could have environmental effects which will cause adverse effects on human beings related to aesthetics, air quality, greenhouse gas emissions, hazards and hazardous materials, noise, population and housing, public services, recreation, and wildfire. Therefore, the impact is potentially significant, and this issue will be further analyzed in the PEIR.

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5 LIST OF PREPARERS

Lead Agency

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

Eduardo Cuevas, Acting Manager of Environmental Planning and Assessment
Nadia Parker, Environmental Supervisor
Jazmin Martin, Environmental Specialist

Technical Assistance Provided By

Michael Baker International, Inc.
801 S. Grand Avenue, Suite 250
Los Angeles, CA 90017

Fareeha Kibriya, Project Director
Vicky Rosen, Project Manager
Frankie Tong, Deputy Project Manager
Jeff Fenner, Senior Environmental Planner
Cristina Lowery, Senior Environmental Planner
Nevia Stickney, Environmental Planner
Jeanette Cappiello, Graphics Specialist