Initial Study

Trunk Line Replacement Program

Lead Agency:

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CEQA Initial Study
Trunk Line Replacement Program

November 2026

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ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
AQMP	Air Quality Management Plan
BMP	Best Management Practice
CALGreen	California Green Building Standards Code
C&D	Construction and Demolition
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CGS	California Geological Survey
CH_4	methane
City	City of Los Angeles
CNPS	California Native Plant Society
CO_2	carbon dioxide
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
GHG	greenhouse gas
Greenbook	Standard Specifications for Public Works Construction
HCP	Habitat Conservation Plan
HDD	Horizontal Directional Drilling
IS	Initial Study
LABOE	Los Angeles Bureau of Engineering
LADOT	Los Angeles Department of Transportation
LADOT Guidelines	LADOT Transportation Assessment Guidelines
LADWP	Los Angeles Department of Water and Power
LAFD	Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAPD	Los Angeles Police Department
LARWQCB	Los Angeles Regional Water Quality Control Board
LASAN	Los Angeles Bureau of Sanitation
LUST	Leaking Underground Storage Tank
Metro	Los Angeles County Metropolitan Transportation Authority
MRZ	mineral resource zone
MWD	Metropolitan Water District of Southern California
NCCP	Natural Community Conservation Plan
N_2O	nitrous oxide
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
NWI	National Wetlands Inventory
O_3	ozone
PM	particulate matter
$PM_{2.5}$	particulates 2.5 microns or less in diameter
PM_{10}	particulates ten microns or less in diameter
PPV	peak particle velocity
RMS	root mean square
ROW	right-of-way
RWQCB	Regional Water Quality Control Board
SCAQMD	South Coast Air Quality Management District
SF_6	sulfur hexafluoride
SGMA	Sustainable Groundwater Management Act

SRA	State Responsibility Area
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
U.S.	United States
USACE	U.S. Army Corps of Engineers
U.S. EPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled

1 PROJECT DESCRIPTION

1.1 Project Overview

The Los Angeles Department of Water and Power (LADWP) proposes to modernize the potable water distribution system by replacing aging pipelines that are part of the City of Los Angeles's (City) regional trunk line system. LADWP's Trunk Line Replacement Program (proposed program) aims to replace, as necessary, trunk lines and connections with the appropriate pipe material and size and upgrade appurtenances to ensure safety, reliability, and redundancy of the system. Using data and field assessments, LADWP strategically prioritizes the replacement of aging infrastructure and chooses the trunk line alignments based on numerous factors.

The proposed program aims to ensure continued safe and reliable transportation and distribution of potable water to its customers throughout the City for residential, industrial, and firefighting purposes. Under the proposed program, six trunk line replacement projects have been identified as priority projects. The proposed program is expected to be implemented over approximately the next 30 years, with the six priority projects occurring in the near term (within the next 10 years).

1.2 California Environmental Quality Act

1.2.1 Lead Agency

The California Environmental Quality Act (CEQA) (California Public Resources Code Section 21000 et seq.) applies to proposed projects initiated by, funded by, and/or requiring discretionary approvals from state or local government agencies. The construction and operation of the Trunk Line Replacement 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 Trunk Line Replacement 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 proposed 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.

In addition, analyses at the project level will be incorporated into the PEIR for six priority trunk line projects that would be implemented within the next 10 years and for which enough detailed development information is available. The PEIR will examine all phases of these individual projects at a site-specific level, including planning, construction, and operation and is intended to provide comprehensive environmental clearance for each. .

1.3 Project Background

LADWP has been supplying water to the City since 1902 and has grown into the nation's second largest municipal water utility. LADWP serves an average of 450 million gallons of water per day to more than four million residents, businesses, and visitors, and supports the vitality and sustainability of the City by providing customers and the communities it serves with reliable, high-quality, and competitively priced water services in a safe and environmentally responsible manner.[1,2] Primary sources of surface water for the LADWP service areas are the Los Angeles Aqueducts, State Water Project (supplied by Metropolitan Water District [MWD]), and the Colorado River Aqueduct (supplied by MWD) (Figure 1). Additional sources include local groundwater and recycled water. LADWP's highly developed water system transports water from these sources to designated treatment facilities and then through the distribution system to reach customers throughout the Los Angeles region (Figure 2).

[1] LADWP, *2023-2026 Strategic Plan*. May 2024. Available at: https://strategicplan.ladwp.com/2023-2026-strategic-plan/. Accessed April 2026.

[2] LADWP, *2024-25 Briefing Book*. October 2025. Available at: https://ladwp-jtti.s3.us-west-2.amazonaws.com/wp-content/uploads/sites/3/2026/05/20133614/2024_25_BB_FullBook_Rev11_Digital.pdf. Accessed April 2026.



LADWP Surface Water Sources

Figure 1

Source: LADWP, 2025a

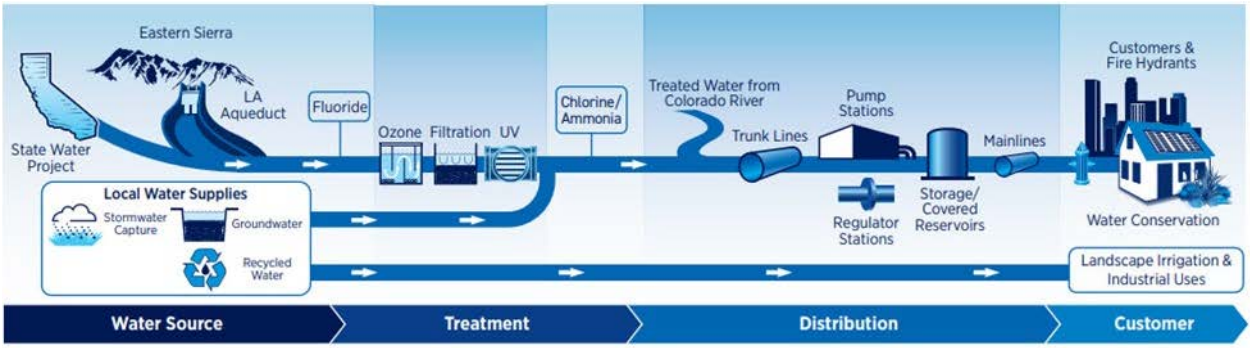


Figure 2. LADWP Water System Infrastructure Source: LADWP

LADWP has an ongoing Water System Capital Improvements Program to improve reliability and safeguard water for the City. As such, LADWP is continually investing in the replacement and improvement of water system infrastructure, including trunk lines, mainlines, meters, and service lines. Other water-related facilities, including chlorination, pumping, and regulator and relief stations, also undergo upgrades and replacements. The proposed program considered in this PEIR focuses specifically on trunk lines and associated pipeline connections, which deliver large amounts of water throughout the City. A large portion of the trunk lines are over 100 years old and are reaching the end of their service life, potentially compromising the integrity of the overall distribution system. The proposed program aims to replace all aging trunk lines and associated infrastructure to decrease the likelihood of significant breaks, associated costs with repairs and property damage, and public safety hazards.

The proposed program is one of LADWP's major initiatives that will help LADWP fulfill its mission of providing quality customer service in the delivery of water through effective installation and maintenance of the distribution system. Every year, LADWP continues to install new pipelines, having replaced approximately 12.3 miles of trunk line since fiscal year (FY) 2018-19r. From 2013 to 2024, LADWP has been steadily expanding its earthquake-resistant ductile iron pipe (ERDIP) network, focusing on critical locations within the water distribution system that are most vulnerable to large ground movement. These efforts have supported the City's Resilience by Design Initiative, which serves to address the City's vulnerabilities to earthquakes with attainable solutions. In the upcoming years, the proposed program aims to maintain compliance with drinking water regulations and achieve the following goals associated with the LADWP Water Infrastructure Plan, LADWP Strategic Plan, and the City's Resilience by Design goals as described below:

- **Water Infrastructure Plan**
    - Accelerate design and construction to achieve 3.5 miles of trunk line replacement each fiscal year by FY 2029-30, to replace high-risk trunk lines
    - Continue to advance the corrosion protection program
    - Enhance trunk line resilience through the use of earthquake-resilient pipe
- **LADWP Strategic Plan**
    - Meet the goals in the Water Infrastructure Plan to anticipate failures and manage resources to minimize service downtime.

- Achieve and maintain the number of leaks per 100 miles of pipe to be less than the national average of 25 leaks per 100 miles of pipe.
- Minimize the amount of water loss to no more than 40 gallons per connection per day.
- Achieve the water conservation goals that are laid out in the Urban Water Management Plan, which is updated every five years, most recently in 2025.

- **City of Los Angeles Resilience by Design**
  - Create a seismic resilient pipe network. Due the complexity of the water system and the cost of pipe replacement, this will be a long-term project that begins in strategically critical areas serving essential facilities and firefighting needs.

1.3.1 Existing Trunk Line Infrastructure

LADWP's trunk lines form the backbone of the City's potable water distribution system (distribution system) and connect to other system components at several critical water infrastructure locations, as described below; the trunk lines determine how water moves across the City. The distribution system is comprised of 86 pump stations, 116 tanks and reservoirs, 350 regulator and relief stations, 6,794 miles of distribution mainlines (mainlines), and 547 miles of trunk lines. See Table 1 for a full list of Water Infrastructure.

- **Reservoirs, Dams, and Tanks:** Reservoirs, dams, and tanks around the City provide storage capacity and pressure management which create operational flexibility to balance water supplies and customer demands.
- **Pump Stations:** Trunk lines connect to pump stations to move large volumes of water into higher elevations. Typical connections include suction and discharge piping, large butterfly and gate valves, surge control equipment, and metering and control instrumentation.
- **Pressure Regulator and Relief Stations:** Regulator and relief stations around the City control water pressure by adjusting for changes in flow and accommodating customer peak usage.
- **Emergency Interties:** Dedicated inter-connections between major trunk lines are installed to provide redundancy and to reroute water around a damaged or shut-down trunk line, balance system flows under stress, and connect separate trunk line systems.
- **Distribution System:** Although trunk lines are high-capacity transmission pipes, each has points where water enters the local distribution system through connections with mainlines, service lines, and fire hydrants.
- **Tunnels and Aqueducts:** Some trunk lines connect to tunnels and aqueducts that mark the point where aqueduct water enters the trunk line network.

Existing trunk lines are greater than 20-inches in diameter and commonly consist of ductile iron, cast iron, welded steel, and riveted steel pipe. Generally, riveted steel trunk lines are assumed to be at risk primarily due to their age, method of fabrication, and lack of coating on the outside of the pipe to protect them from surrounding corrosive soil.

Since 2013, LADWP has incorporated seismic resiliency in its design of water infrastructure through the use of ERDIP and welded steel pipe, focusing on critical locations along the distribution system most vulnerable to large ground movement. ERDIP is a specialized type of

ductile iron pipe with seismic joints and welded steel pipeline designed to withstand the ground movements and stresses caused by earthquakes.

Table 1. List of Existing LADWP Water System Infrastructure	
Distribution Mainlines (miles)	6,794
Trunk Lines (miles)	547
Large Valves	2,800+
Major Active Reservoirs	10
Smaller Reservoirs and Tanks	106
Dams	25
Treatment Facilities	39
Pump Stations	86
Pressure Regulator and Relief Stations	348
Large Meters	7,300
Small Meters	700,000
Los Angeles Aqueduct Conveyance System (miles)	476
Los Angeles Aqueduct Reservoirs	8
Los Angeles Aqueduct Dam	10

Source: LADWP, 2025

1.3.2 Assessment of Water Distribution Infrastructure and Trunk Line System Needs

All major water infrastructure components are evaluated through the ongoing Asset Management Program to monitor, maintain, and upgrade or replace infrastructure strategically and in the most optimal way to minimize impacts to customers. The Asset Management Program aims to systematically manage assets to minimize the total cost of ownership, including capital, operations, and maintenance costs.

LADWP assesses trunk lines through a risk-based asset management analysis that provides a data-driven assessment using readily available pipe attributes and other factors (see Section 1.3.3, Segment Prioritization Criteria). This risk-based asset management analysis identifies the trunk line segments most vulnerable to failure and serves as the initial basis for prioritizing replacement. Then, additional considerations such as operational needs, system constraints, coordination with other ongoing or planned projects, and available funding are incorporated to further refine and determine which trunk line segments are selected for replacement, prioritized, and initiated as capital projects.

1.3.3 Segment Prioritization Criteria

The Asset Management Program analyzes individual trunk lines and identifies business risk exposure, likelihood of failure, and consequences of failure. Prioritization of the trunk line segments under the proposed program is based on the following factors:

- Leak history (quantity and density of leaks, type of leaks, time between leaks)
- Age and material of pipe (design and construction method used at time of installation)

- Soil conditions (corrosiveness, hillside, landslide, fault line, and liquefaction potential)
- Risk of service interruption and community disruptions
- Coordination with other Water System capital improvement projects (based on bid-award, procurement, and construction schedule)

Based on the aforementioned considerations for prioritization, LADWP has identified six trunk line replacement projects within the City or surrounding areas with anticipated bid-award, procurement, or construction dates in 2028 or later that are suitable for project-level analysis in the PEIR.

1.4 Project Location and Setting

LADWP's existing trunk line system and any subsequent trunk line replacements generally fall within the public right-of-way (ROW), beneath the pavement of public streets throughout the City and surrounding areas. When LADWP determines it is not feasible for a pipeline installation to be made in a public street and must be made in a private street or property, an easement may be warranted. The conditions under which such an exception would be allowed are determined on a case-by-case basis.

1.4.1 Service Areas

Districts

The water distribution service areas (also known as "districts") are categorized into five major areas: West Valley District, East Valley District, Central District, Western District, and Harbor District (Figure 3). Each district has its respective district yard which is managed by dedicated field crews who are responsible for maintenance and servicing of the system.

- **West Valley District:** provides coverage for the communities west of the 405 freeway and Sepulveda Boulevard and north of Mulholland Drive, including Bell Canyon, Calabasas, Canoga Park, Chatsworth, Encino, Granada Hills, Lake Balboa, Northridge, Porter Ranch, Reseda, Tarzana, Warner Center, West Hills, Winnetka, Woodland Hills, and parts of Mission Hills and North Hills.
- **East Valley District:** provides coverage for the communities east of the 405 freeway and Sepulveda Boulevard and north of Mulholland Drive, including Arleta, Lake View Terrace, North Hollywood, Olive View, Pacoima, Panorama City, Shadow Hills, Sherman Oaks, Studio City, Sunland, Sun Valley-Sylmar, Sylmar Square, Toluca Lake, Tujunga, Universal City, Valley Village, Valley Glen, Van Nuys, and parts of Hollywood, Mission Hills, and North Hills.
- **Western District:** provides coverage for the communities south of Mulholland Drive, west of Western Avenue, and north of Slauson Avenue, including Baldwin Hills, Bel Air Estates, Beverly Glen, Brentwood, Castellammare, Century City, Cheviot Hills. Country Club Park, Crenshaw, Hancock Park, Mar Vista, Mid City, Mount Olympus, Pacific Palisades, Palisades Highlands, Palms, Park La Brea, Playa Del Rey, Rancho Park, Sawtelle, Slauson. Venice, West Los Angeles, Westchester, Westwood, and parts of Culver City, Hollywood, and West Hollywood.

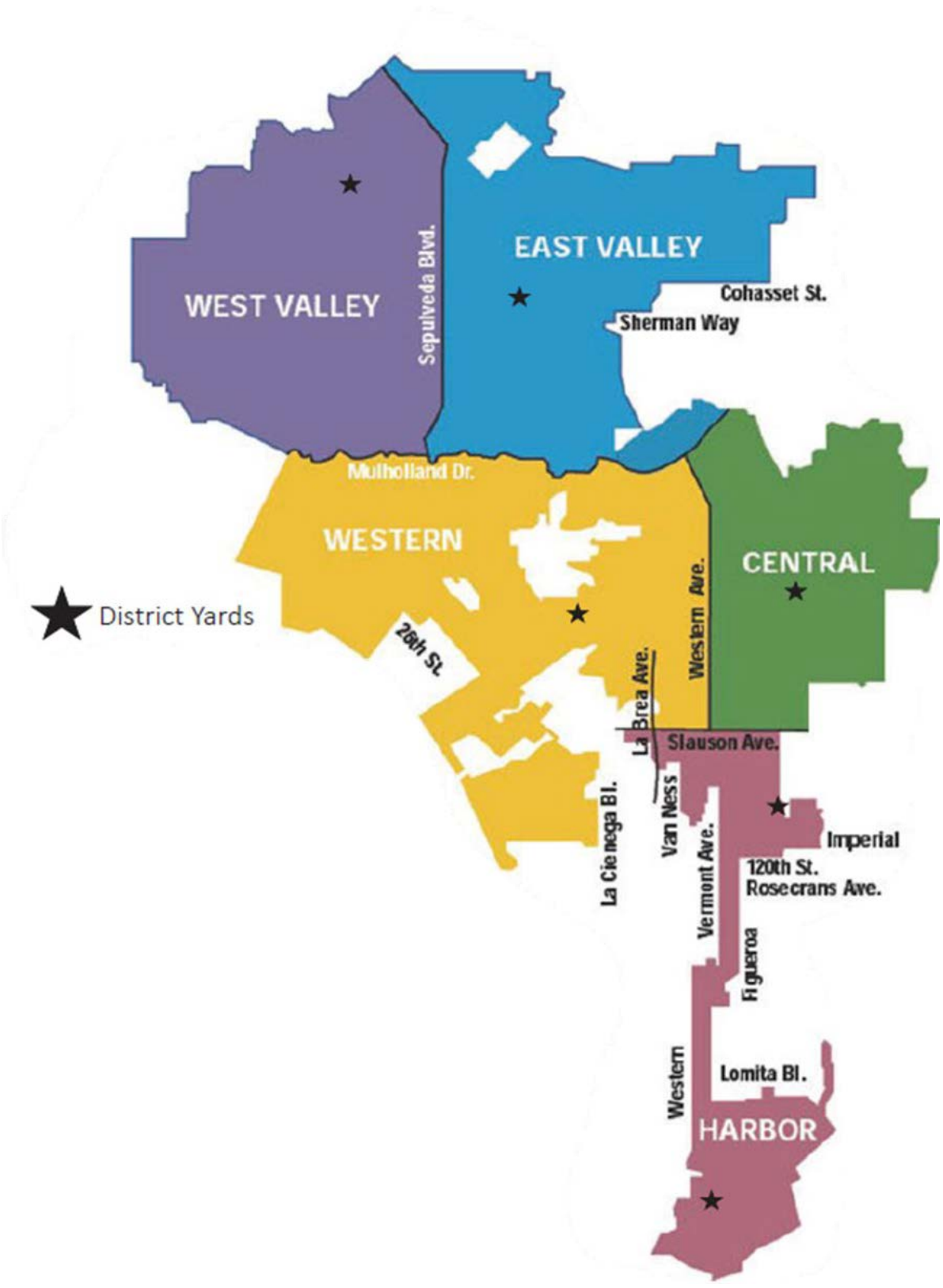


Figure 3. LADWP Water Service Districts

- **Central District:** provides coverage for the communities south of Mulholland Drive, east of Western Avenue, and north of Slauson Avenue, including Atwater Village, Boyle Heights, Chinatown, Eagle Rock, Echo Park, El Sereno, Glassell Park, Highland Park, Koreatown, Lincoln Heights, Little Tokyo, Los Feliz, Montecito Heights, Monterey Hills, Mt. Washington, Pico-Union, Silverlake, Slauson, South Pasadena, and Westlake.
- **Harbor District:** provides coverage for the communities south of Slauson Avenue, including East San Pedro (Terminal Island), Harbor City, Harbor Gateway, Hyde Park, LA City Strip, San Pedro, Slauson, Watts, and Wilmington.

System Elevation Zones/Service Zones

The LADWP distribution system is designed with elevation zones to manage water distribution effectively. Water flows into the City from a filtration plant and is distributed through trunk lines that connect to mainlines for local delivery. The distribution system is divided into pressure zones based on elevation, with low-elevation zones receiving water primarily through gravity and high-elevation zones requiring pumping stations for delivery. These zones, commonly referred to as "service zones," are classified by the service area's altitude in feet. LADWP's distribution system has a total of 109 service zones.

1.4.2 Proposed Trunk Line Replacement Program Locations

The proposed program spans the entire LADWP Water System Service area of the City of Los Angeles. While most LADWP water service infrastructure resides within City Limits, some may be found in areas that are adjacent to the City's boundaries, such as unincorporated Los Angeles County or neighboring municipalities. The proposed program would cover the entirety of the trunk line system and would be located within at least one of LADWP's five major water districts: West Valley District, East Valley District, Central District, Western District, and/or Harbor District.

LADWP's existing trunk line system and any future trunk line replacement projects under the proposed program generally fall within the public ROW, beneath the pavement of public streets. When LADWP determines it is not feasible for a pipeline installation to be made in a public street and must be made in a private street or property, an easement may be warranted. The conditions under which such an exception would be allowed are determined on a case-by-case basis.

1.4.3 Priority Trunk Line Replacement Project Locations

The following six trunk line replacements are considered priority projects and will be analyzed at a project-level in the PEIR:

- Alameda Feeder No. 2
- Effie-Sunset Trunk Line Replacement
- Franklin Baldwin Trunk Line Replacement Unit 1 & Baldwin Outlet Trunk Line Replacement Unit 1
- Hayvenhurst Trunk Line Replacement Unit 1
- Stone Canyon & Sunset West Trunk Line Replacements Unit 2
- Sunset Trunk Line Replacement

The locations of these priority projects are described below. Collectively, the areas where pipeline work would occur, including pipeline installation, abandonment, and connection work, will be

termed the “project alignment”. The project alignments would generally occur within the public road right-of-way (ROW). Instances where project alignments fall outside of the public road ROW are described below. Periodic intrusions into the sidewalks and/or parkways along these roadways would also occur for installation of pipeline appurtenances (e.g., valves, hydrants, combination air/vacuum breaker valves, water service connections). Figure 4, Priority Project Location Map, shows all six priority projects within a regional context.

Alameda Feeder No. 2 Project

The Alameda Feeder No. 2 Project is located within the Wilmington community of the City of Los Angeles and in the City of Carson. The City of Compton is located north of Carson and Wilmington, and the City of Long Beach is to the east. The City of Los Angeles community of San Pedro is to the south, and the communities of Harbor City, Harbor Gateway, and Gardena are to the west. Within Wilmington and Carson, the project alignment is situated near the Interstate (I) 110 and the I-710 Freeways. The Alameda Feeder No. 2 Project alignment would extend approximately 14,800 linear feet along Alameda Street and Henry Ford Avenue. The land uses along the alignment include commercial, industrial, and residential properties. Figure 5, Proposed Alameda Feeder No. 2 Project Alignment, shows the project location within a local context.

Effie-Sunset Trunk Line Replacement Project

The Effie-Sunset Trunk Line Replacement Project is located within the City of Los Angeles communities of Downtown, Echo Park, Silver Lake, and Los Feliz. The Griffith Park community is to the north; the communities of Atwater Village, Elysian Valley, Elysian Park, and China Town are to the east; the communities of Boyle Heights, Vernon, Central-Alameda, Historic South-Central, and Pico Union are to the south; and the communities of Westlake and East Hollywood are to the west. Within the communities of Downtown, Echo Park, Silver Lake, and Los Feliz, the project alignment is near the I-110 Freeway and the US-101 State Route (SR) -2 Highways. The project alignment would extend approximately 20,120 linear feet along Hillhurst Avenue, Virgil Avenue, Fountain Avenue, Hoover Street, Gateway Avenue, Manzanita Street, Sunset Boulevard, Coronado Street, and Temple Street. The land uses along the alignment include commercial, residential and institutional properties, a medical campus, and a recreational facility. Figure 6, Proposed Effie-Sunset Trunk Line Replacement Alignment, shows the project location within a local context.

Franklin Baldwin Trunk Line Replacement Unit 1 & Baldwin Outlet Trunk Line Replacement Unit 1 Project

The Franklin Baldwin Trunk Line Replacement Unit 1 & Baldwin Outlet Trunk Line Replacement Unit 1 Project (Baldwin Trunk Line Replacement Project) alignment is located within the City of Los Angeles community of Baldwin Hills and the Cities of Ladera Heights and Windsor Hills. The West Adams community is located to the north of the project area; the Leimert Park community is to the east; the Hyde Park community is to the east and south, and the City of Culver City is to the west. Within the communities of Baldwin Hills and Cities of Ladera Heights and Windsor Hills, the project alignment is situated between the I-10, I-405, and I-110 Freeways.

This project alignment would extend approximately 8,970 linear feet along La Brea Avenue. The land uses along the alignment include residential and commercial properties and recreational facilities. Figure 7, Proposed Baldwin Trunk Line Replacement Project Alignment, shows the project location within a local context.

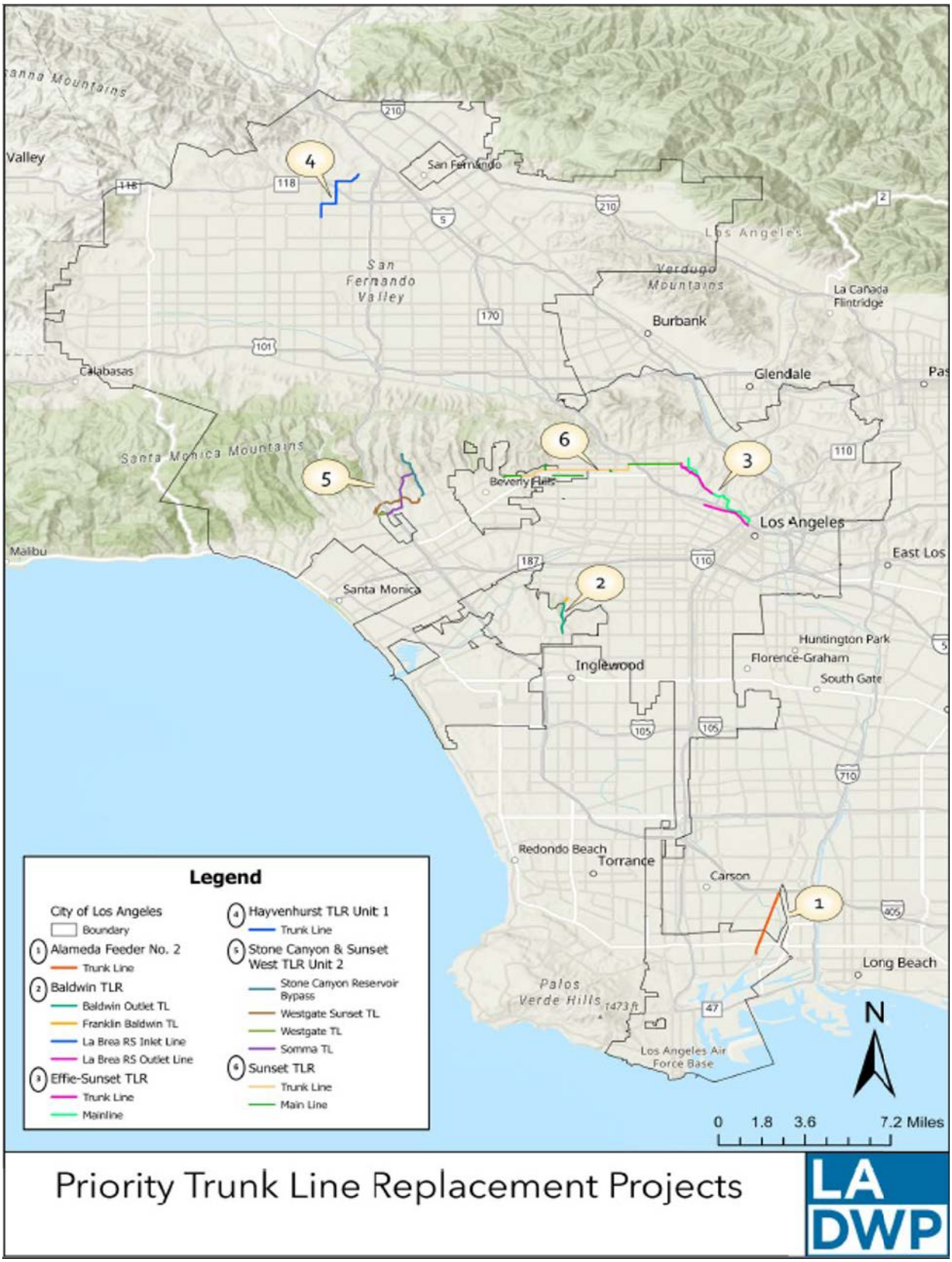


Figure 4. Priority Project Location Map

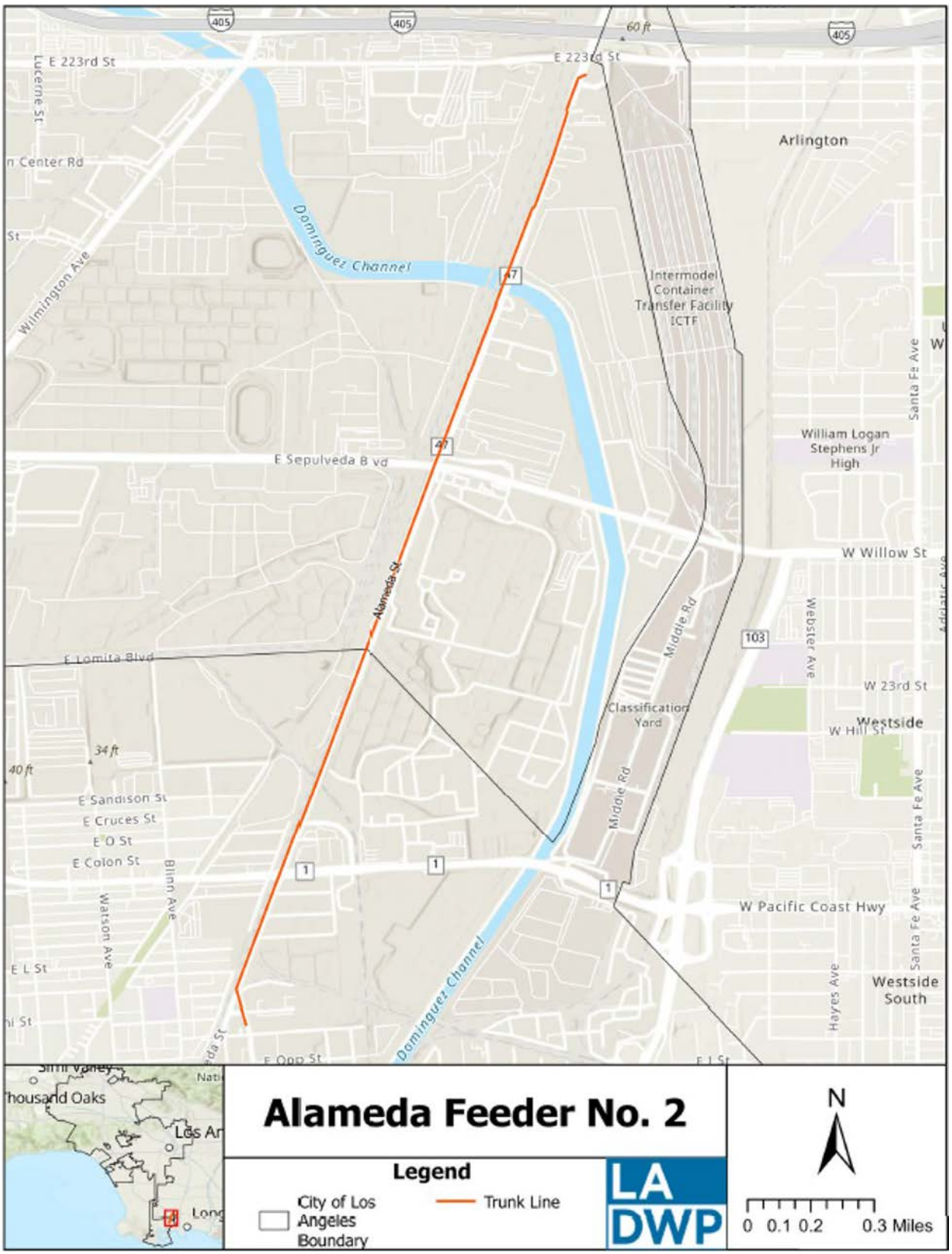


Figure 5. Proposed Alameda Feeder No. 2 Alignment

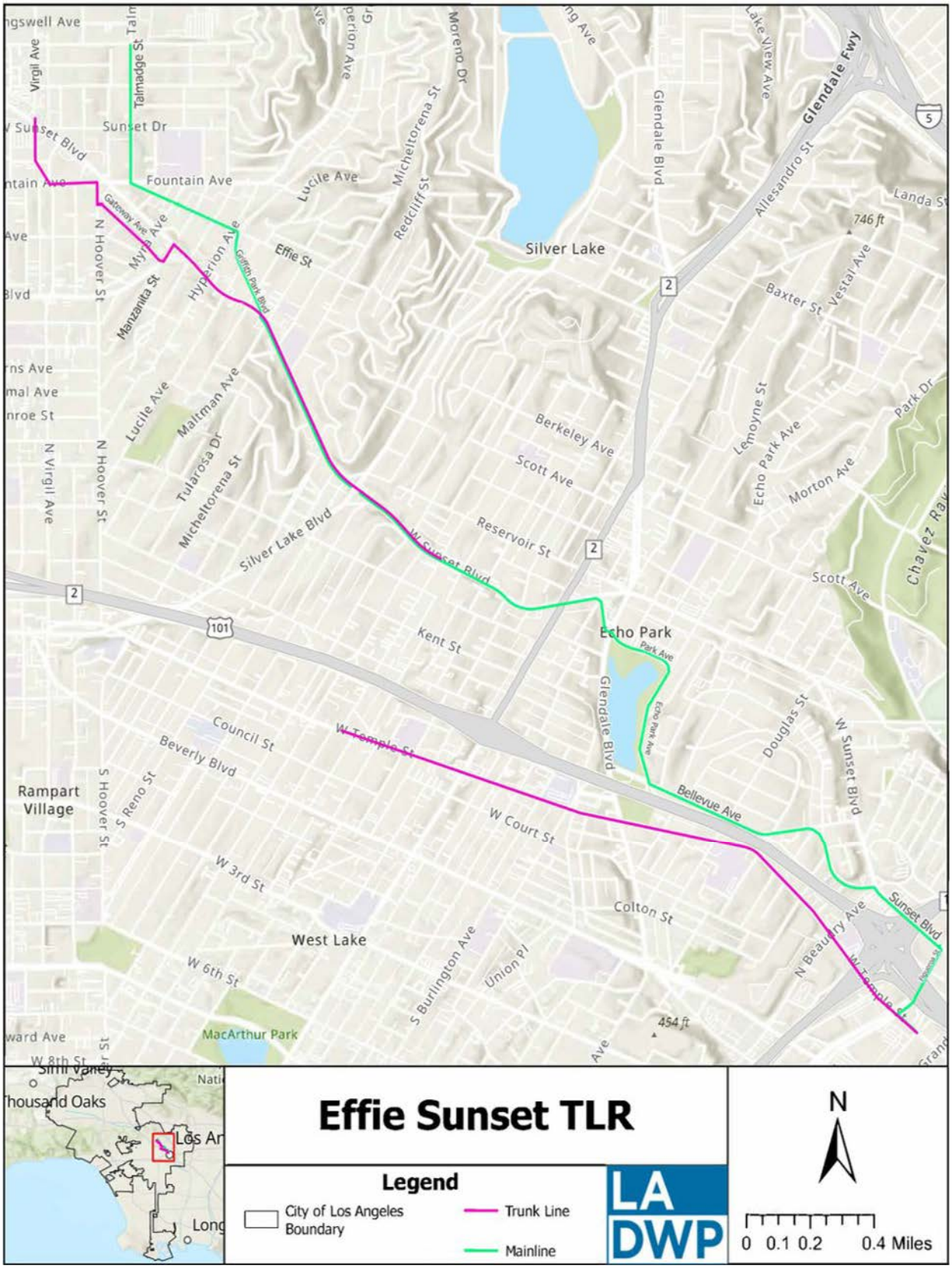


Figure 6. Proposed Effie-Sunset Trunk Line Replacement Project Alignment

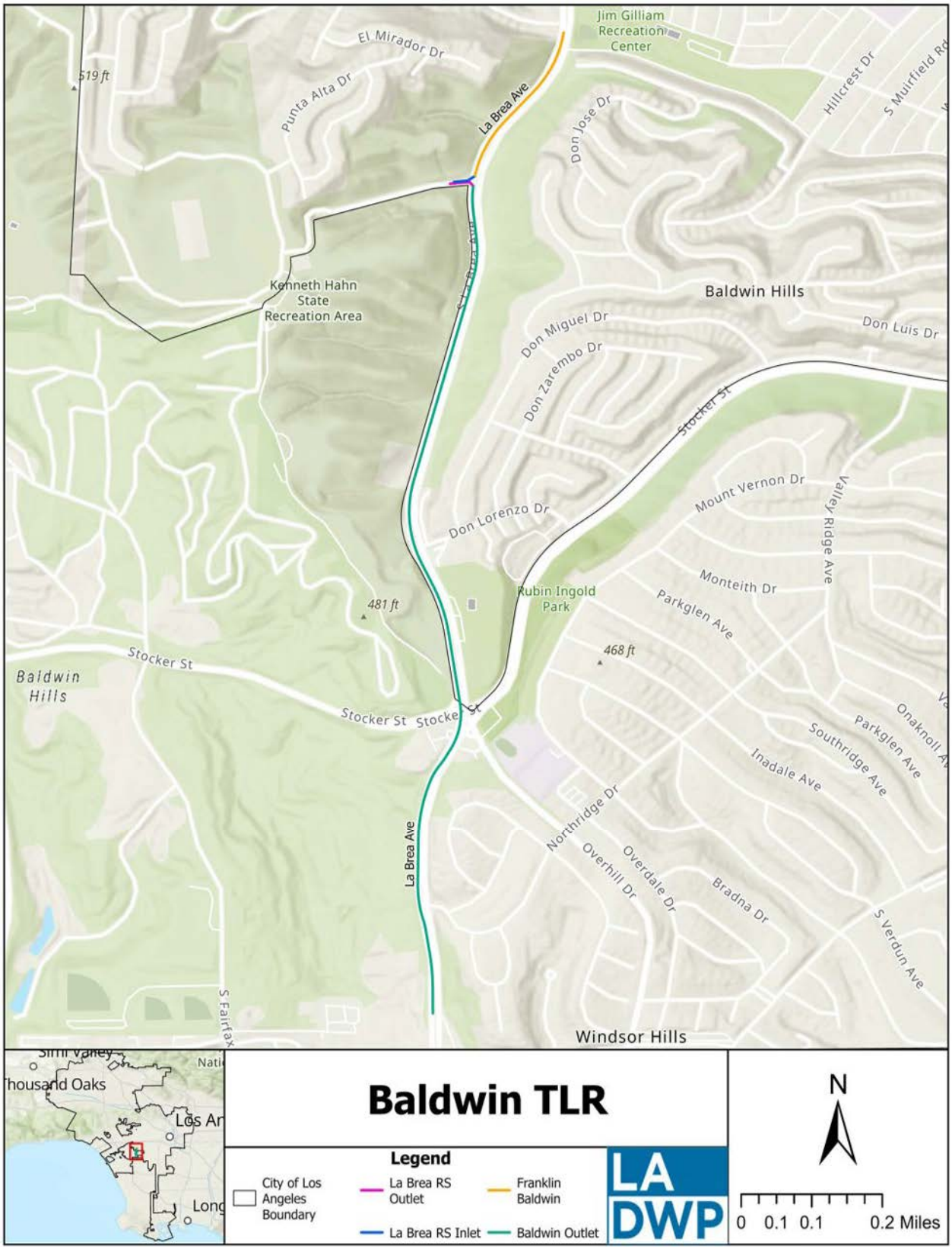


Figure 7. Proposed Baldwin Trunk Line Replacement Project Alignment

Hayvenhurst Trunk Line Replacement Unit 1 Project

The Hayvenhurst Trunk Line Replacement Unit 1 Project is located within the City of Los Angeles community of Granada Hills. The Santa Susana Mountains are located to the north of the project area; the communities of Sylmar and Mission Hills are to the east; the communities of North Hills and Northridge are to the south; and the Porter Ranch community is to the west. Within the Granada Hills community, the project alignment is situated near the SR-118 Highway and the I-405 and I-5 Freeways.

The proposed project alignment would begin at the southern portion of LADWP's Van Norman Complex (VNC) and extend approximately 16,150 linear feet along Rinaldi Street, Hayvenhurst Avenue, Chatsworth Street, and Balboa Boulevard. The land uses along the alignment include residential, commercial, and institutional uses, as well as LADWP water and power utility infrastructure. Figure 8, Proposed Hayvenhurst Trunk Line Replacement Unit 1 Project Alignment, shows the project location within a local context.

Stone Canyon & Sunset West Trunk Line Replacement Unit 2 Project

The Stone Canyon & Sunset West Trunk Line Replacement Unit 2 Project is located within the City of Los Angeles communities of Bel Air, Westwood, and Brentwood as well as unincorporated Los Angeles County. The communities of Sherman Oaks and Encino are located to the north of the project area; the Beverly Crest community and City of Beverly Hills are to the east; the communities of Century City, West Los Angeles, and Sawtelle are to the south, and the Pacific Palisades community and City of Santa Monica are to the west. Within the project region, the project alignment is situated near I-405 Freeway and the SR-2 Highway.

The Stone Canyon & Sunset West Trunk Line Replacement Unit 2 Project would replace approximately 38,000 linear feet of pipeline among four trunk line replacement sections: Stone Canyon Reservoir Bypass, Somma (North and South), Westgate Sunset (East and West), and Westgate.

The Stone Canyon Reservoir Bypass Trunk Line Replacement alignment would extend along Stone Canyon Road. Land uses along this portion of the alignment include residential and commercial properties. The northern section of the Somma Trunk Line Replacement alignment would extend along the public road ROWs of Somma Way, Stradella Road, Chantilly Road, Chalon Road, Tarcuto Way, and Bellagio Road, and easements between Somma Way and Stradella Road, Stradella Road and Chantilly Road, and Tarcuto Way and the intersection of Bellagio Road and Bellagio Way. Land uses along this portion of the alignment include residential properties and the Bel Air Country Club. The southern section of the Somma Trunk Line Replacement alignment would extend along Sunset Boulevard, Veteran Avenue, Montana Avenue, and Beloit Avenue. Land uses along this portion of the alignment include residential properties, institutional uses associated with the University of California, Los Angeles, and the Sage Hill Native Plants & Wildlife Habitat.

The eastern section of Westgate Sunset Trunk Line Replacement alignment would extend along Sunset Boulevard between Marymount Place and Bellagio Road. Land uses along this portion of the alignment include residential, commercial, and institutional uses. The western section of the Westgate Sunset Trunk Line Replacement Project alignment would extend along Sunset Boulevard between Bellagio Road and Chayote Street. Land uses along this portion of the alignment include commercial and institutional uses.

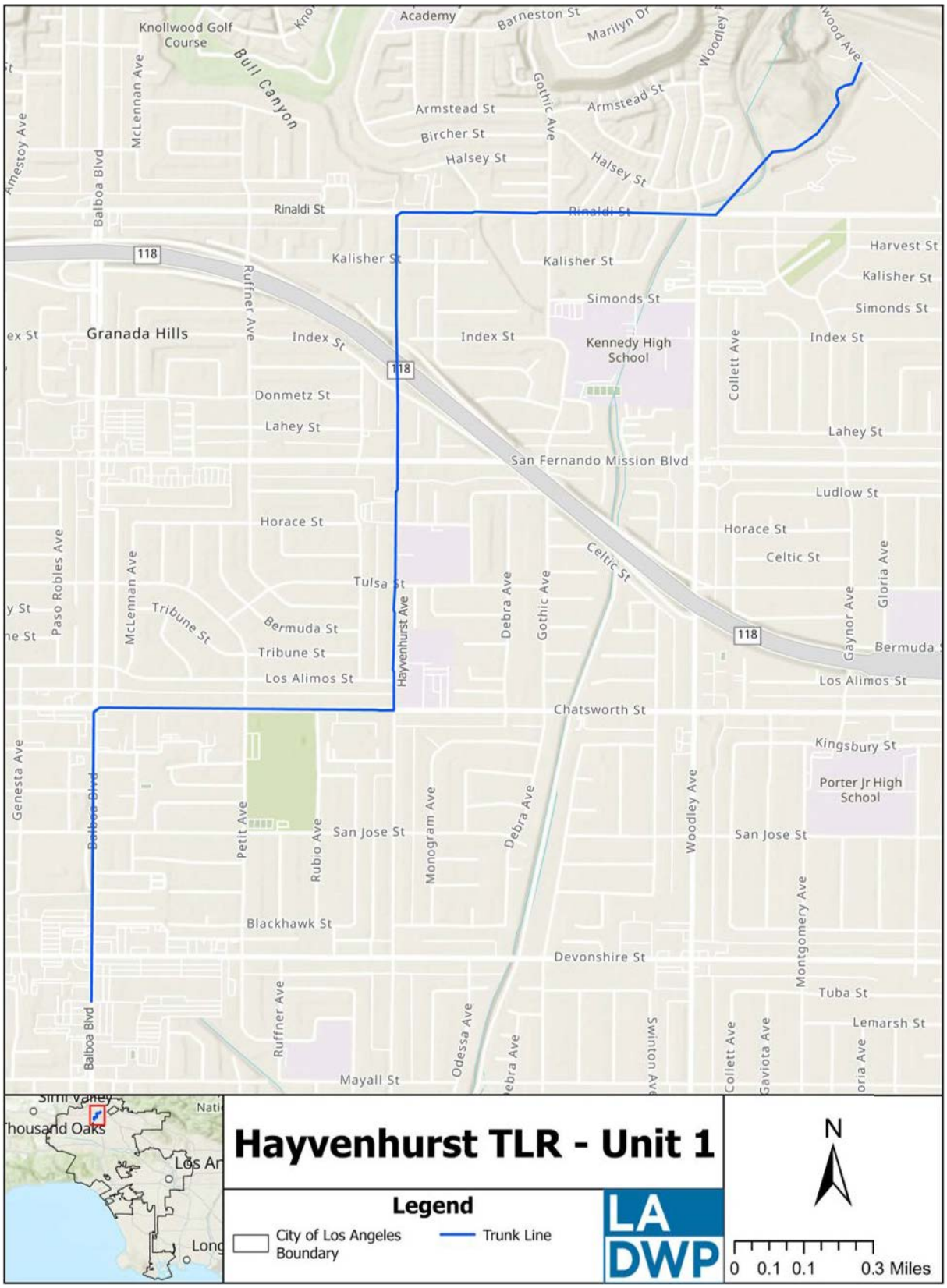


Figure 8. Proposed Hayvenhurst Trunk Line Replacement Unit 1 Project Alignment

The Westgate Trunk Line Replacement alignment would extend along the public road ROWs of Beloit Avenue and Chayote Street, and an easement from the intersection of Beloit Avenue and Farlin Street to the intersection of Barrington Place and Chayote Street. Land uses along this portion of the alignment include residential and commercial properties. Figure 9, Proposed Stone Canyon & Sunset West Trunk Line Replacement Unit 2 Project Alignment, shows the project location within a local context.

Sunset Trunk Line Replacement Project

The Sunset Trunk Line Replacement Project is located within the City of Los Angeles communities of East Hollywood, Hollywood, and Hollywood Hills West as well as the Cities of West Hollywood and Beverly Hills. The communities of Beverly Crest, Hollywood Hills West, Hollywood Hills, and Los Feliz are to the north; the Silver Lake community are to the east; the communities of Koreatown, Windsor Square, Hancock Park, Fairfax, Beverly Grove, Carthay, and Pico-Roberston are to the south; and the communities of Westwood and Century City are to the west. Within the project region, the project alignment is situated near the US-101 Freeway and the SR-2 Highway.

The Sunset Trunk Line Replacement Project alignment would extend approximately 34,027 linear feet along Sunset Boulevard, Holloway Drive, Hacienda Place, Fountain Avenue, Harper Avenue, Cole Avenue, La Mirada Avenue, and Tamarind Avenue. The land uses along the alignment include residential, commercial, and institutional uses. Figure 10, Proposed Sunset Trunk Line Replacement Project Alignment, shows the project location within a local context.

1.5 Description of Proposed Trunk Line Replacement Program

As previously stated, trunk lines are a major component of LADWP's water distribution system; they deliver and redistribute large amounts of water through the City to ensure a reliable supply is available for potable uses and firefighting. Due to their age and material, many trunk lines are due for full or partial replacement. Moreover, some trunk lines are located in seismically active areas and require new pipelines made of ERDIP that can accommodate seismic loads created by ground displacement from an earthquake. In addition to the trunk lines, distribution main lines, associated infrastructure (e.g., regulator stations), and various appurtenances (e.g., valves, meters, and maintenance holes), would be installed or replaced as required to support operation and maintenance of trunk lines. Following the completion of trunk line replacement projects, LADWP will decommission the existing trunk lines that are no longer proposed to be in service.

All of the projects implemented under the proposed program would be classified as replacements for existing trunk lines and not as new trunk line installations. The proposed project would accelerate the replacement of high-risk trunk lines, avoid major pipeline breaks, and minimize service downtime. The proposed program metrics include miles of trunk line that are installed per year, number of active construction projects per year, and number of trunk line crews available.

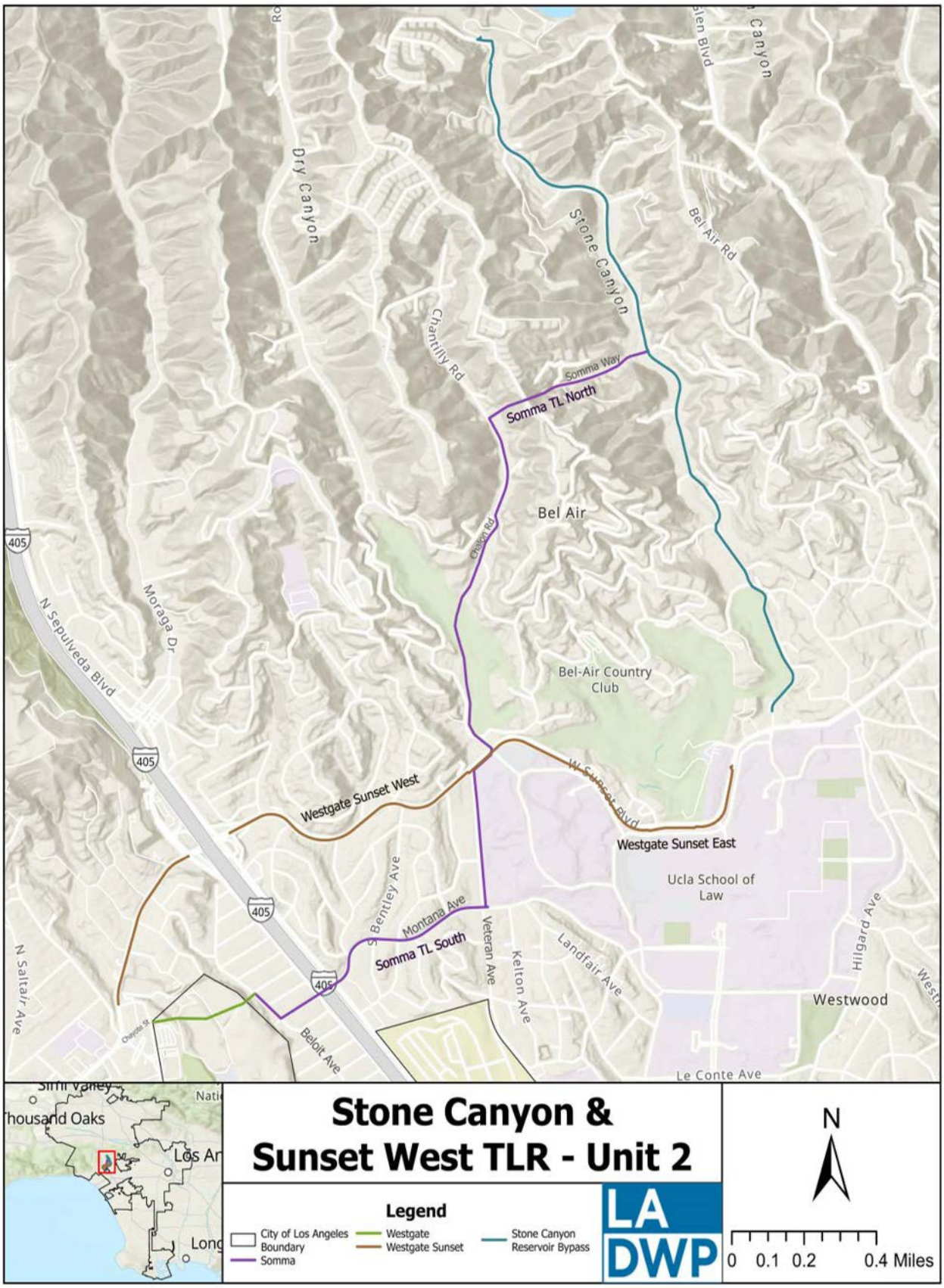


Figure 9. Proposed Stone Canyon & Sunset West Trunk Line Replacement Unit 2 Project Alignment

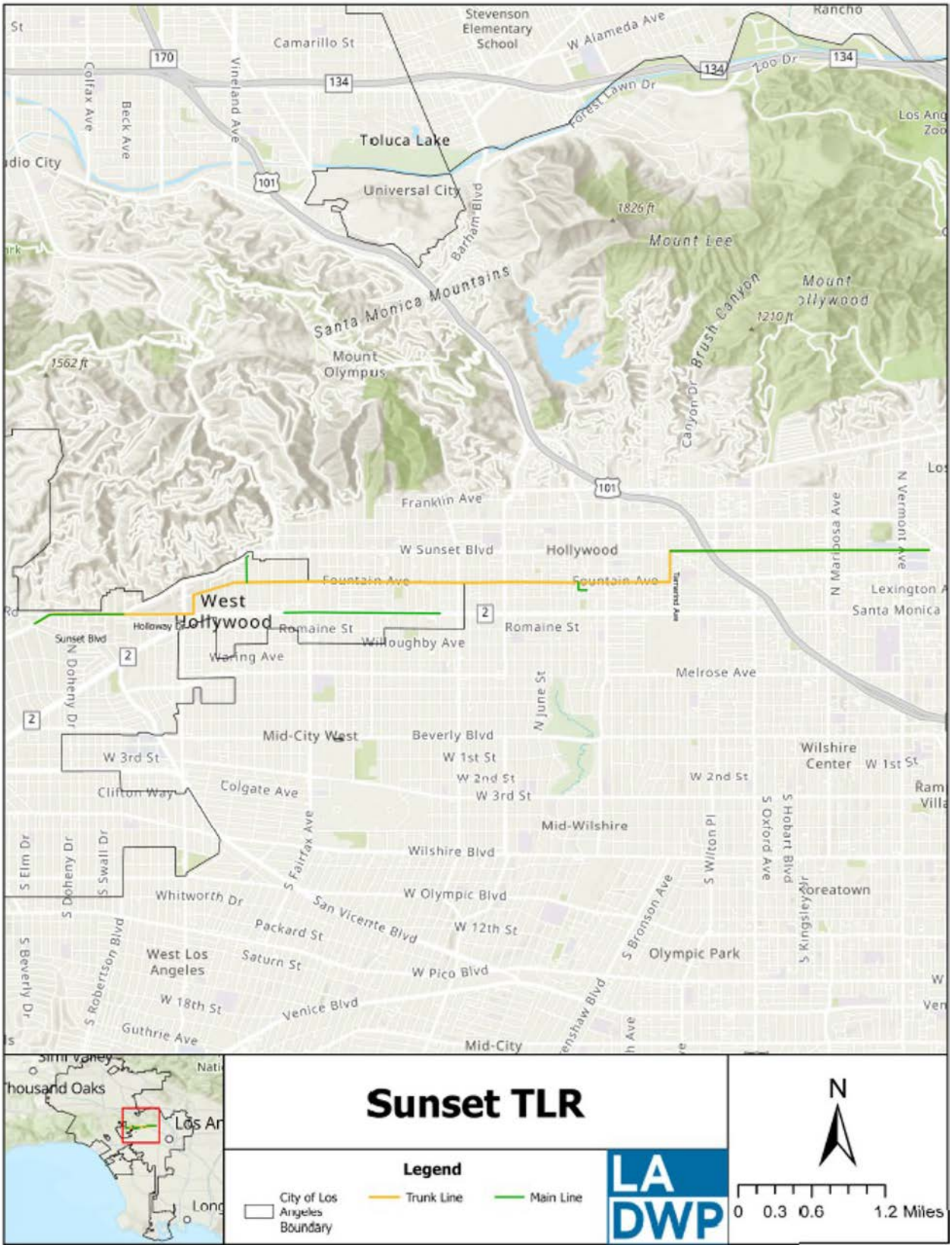


Figure 10. Proposed Sunset Trunk Line Replacement Project Alignment

1.5.1 Proposed Trunk Line Components

Trunk Lines and Mainlines

As previously mentioned, LADWP's trunk line system includes 547 miles of trunk line. Trunk lines are defined as larger than 20-inch diameter pipelines that provide the transmission capacity to move large amounts of raw or potable water around the city, from or to treatment facilities and storage reservoirs, and to delivery points which feed supply and mainlines. LADWP has approximately 6,794 miles of mainlines, which are 20-inch or smaller diameter pipe along public streets or appropriate ROWs generally used for distributing water to individual consumers. Trunk line replacement projects would also require installation of some new or replacement of mainline segments to ensure connections are reestablished to the existing service zones.

Pipe Material

Welded steel has become the standard for trunk lines and can be combined with reinforced concrete cylinder, prestressed concrete cylinder, or ductile iron. Additionally, to fortify the trunk line against corrosion, all proposed welded steel trunk lines are provided with a galvanic cathodic protection system.

In accordance with the City's Resilience by Design Initiative, the trunk line and all applicable components shall be designed to remain operable during and following a Criticality Category IV design-basis earthquake which refers to a safety classification of structures, systems, and components that can withstand the design-basis earthquake without loss of safety function.[3] Resiliency analysis would be conducted by LADWP Engineers for all proposed projects to determine if ERDIP material is necessary.

Common Service Laterals

Water is conveyed from mainlines to the customer's plumbing by service laterals, which include all pipes, fittings, valves, and appurtenances up to the customer's water meter. These service connections are made by "tapping" into the distribution mainline and running a service connection line to a meter, which is then connected to the consumer's property pipe water system.

1.5.2 Route Identification Considerations

For every trunk line replacement project, LADWP's Water System conducts a series of analyses (e.g., route study, hydraulic analysis, geotechnical and geologic assessment, and CEQA review) to determine the most appropriate alignment. The following route selection criteria derived from the analyses are used to evaluate potential trunk line alignments: scope of work requirements, minimum subsurface corridor, substructures, minimum work area width, traffic, critical facilities and special impact facilities, geotechnical and geological impacts, and environmental impacts.

Scope Requirements: Scope requirements (such as hydraulics, facilities, project boundaries, connection points, etc.) are identified by LADWP in the route study.

Minimum Subsurface Corridor: The minimum subsurface corridor for open trench construction is the clearance width needed to accommodate the required pipe diameter, the installation trench width, the trench shoring system, and the distance from the proposed shoring system outside

[3] City of Los Angeles. 2016. *Resilience by Design*. January 2016. Available at: https://dbs.lacity.gov/sites/default/files/efs/pdf/publications/misc/Resilience-by-Design.pdf. Accessed April 2026.

edge to the existing parallel substructure edge needed to avoid damaging substructures during construction.

Substructures: As-built plans and maps are utilized to determine possible routes. Substructure investigation to evaluate substructure density involves acquiring substructure as-built plans from various utility companies. LADWP aims to minimize substructure relocations and maintain allowable separation from substructures.

Minimum Work Area Width: Work areas for open trench construction will require sufficient width for construction equipment to operate on one side of the trench and for separation of traffic on each side of the work area, where applicable.

Traffic: All route options are evaluated for existing traffic volume and contributing traffic factors are determined. To minimize traffic impacts at major intersections, pipe jacking will need to be considered. LADWP aims to minimize impacts on traffic density.

Critical Facilities and Special Impact Facilities: Where feasible, alignments directly adjacent to or within close proximity of critical facilities are to be avoided. Where unavoidable, steps must be taken during the design phase to ensure continuous access to the facilities and to minimize traffic impacts in the areas surrounding these facilities during construction.

Special impact facilities are those with an increased sensitivity to the effects of construction, including schools, day care and pre-schools, colleges and universities, convalescent homes/skilled nursing facilities, and places of worship. They require additional coordination to mitigate those effects, as well as potential safety and traffic challenges.

Geotechnical and Geological Impacts: As part of the route study, LADWP conducts a preliminary assessment of the proposed project area. The purpose of the assessment is to identify geotechnical concerns or geologic hazards potentially impacting the route selection of the proposed trunk line in order to minimize the trunk line risk exposure.

Environmental Impacts: LADWP aims to minimize environmental impact and overlap with contaminated areas.

1.5.3 Priority Trunk Line Replacement Projects

Alameda Feeder No. 2 Project

The Alameda Feeder No. 2 Project would install approximately 12,600 feet of 24-inch welded steel trunk line parallel to the existing Alameda Trunk Line beginning immediately downstream of the existing MWD LA-16 connection, continuing south along Alameda Street, and connecting to the Pacific Coast Highway and Alameda Regulator Station just east of the Pacific Coast Highway. Continuing south, the Alameda Feeder No. 2 Project would remove and replace 2,200 feet of 24-inch cast iron and ductile iron segments with the same size pipe from the intersection of Alameda Street and Pacific Coast Highway to its final connection at the Henry Ford and Grand Regulator Station just north of the intersection of Henry Ford Avenue and Grant Street. The proposed parallel pipelines would provide operational flexibility and redundancy to the East 240 service zone.

The project would also involve installation of appurtenant devices, including maintenance/access holes, isolation valves, blow-offs, combination air/vacuum breaker valves, water service connections, flow meters, vaults, and connections to hydrants.

Effie-Sunset Trunk Line Replacement Project

The Effie-Sunset Trunk Line Replacement Project would install approximately 20,120 feet of 30-inch welded steel pipe beginning at its connection to the existing Hillhurst Trunk Line on Hillhurst Avenue north of Hollywood Boulevard, then continuing south along Hillhurst Avenue and Virgil Avenue, east along Fountain Avenue, south along Hoover Street, and southeast along Gateway Avenue. The alignment would then continue northwest along Manzanita Street, and southeast along Sunset Boulevard towards the bridge crossing at Silver Lake Boulevard. A portion of the Effie-Sunset Trunk Line Replacement Project that hangs beneath this bridge would be replaced in-line, and the pipe diameter would reduce to 24 inches to match the diameter of the existing penetrations in the bridge abutments.

Southeast of the bridge, the pipe diameter would enlarge to 30 inches and continue along Sunset Boulevard until its connection to the existing Coronado Trunk Line at Coronado Street. From this point, the Coronado Trunk Line would serve as the replacement trunk line for this project until the alignment would resume at the intersection of Coronado Street and Temple Street and proceeds southeast along Temple Street. At the intersection of Temple Street and Beaudry Avenue, a tee would be installed to connect to the existing 16-inch mainline along Beaudry Avenue, which serves as the connection to the Solano Reservoir Outlet Line at the intersection of Sunset Boulevard and Beaudry Avenue. The alignment would continue southeast along Temple Street, where it would be pipe jacked to cross the Temple Street and Figueroa Street intersection, and would end at its final connection to an existing 20-inch water main at the intersection of Temple Street and Hope Street.

This project would also include installation of apprxoimately 23,700 linear feet of 12-inch mainline along the Effie-Sunset Trunk Line alignment and 500 feet of 12-inch mainline would be installed along Hillhurst Avenue, between the cross roads of Clayton Avenue and Sunset Boulevard, to continue servicing fire hydrants and customer services when the existing Effie-Sunset Trunk Line is decommissioned. The 23,700 feet of 12-inch mainline would start on Talmadge Street at Prospect Avenue, continue southeast along Sunset Boulevard, and end at the intersection of Figueroa Street and Temple Street. The project would also involve installation of appurtenant valves at intersections along the alignment.

Franklin Baldwin Trunk Line Unit 1 & Baldwin Outlet Trunk Line Unit 1 Replacement Project

The Franklin Baldwin Trunk Line Unit 1 & Baldwin Outlet Trunk Line Unit 1 Replacement Projects, collectively called the Baldwin Trunk Line Replacement Project, would include installation of approximately 8,970 feet of 60-inch ERDIP for the Franklin Baldwin Trunk Line Replacement and 66-inch ERDIP for the Baldwin Outlet Trunk Line Replacement, and welded steel pipe at the La Brea Regulator Station inlet/outlet lines, prioritizing the 3,000 feet of trunk line along La Brea Avenue that is deeper than the rest of the alignment. The Baldwin Trunk Line Replacement Project alignment would begin at its connection to the Franklin Baldwin Trunk Line just south of the intersection of La Brea Avenue and Veronica Street and continue south towards the La Brea Regulator Station inlet/outlet lines. The alignment would continue south along La Brea Avenue and end at its final connection to the Baldwin Outlet Trunk Line just north of Slauson Avenue. The project would also involve installation of appurtenant devices, including maintenance holes, blow-offs, valves, and replacement of the butt-strap joint between the intersections of La Brea Avenue and Stocker Street and La Brea Avenue and Slauson Avenue.

Hayvenhurst Trunk Line Replacement Unit 1 Project

The Hayvenhurst Trunk Line Replacement Unit 1 Project would install approximately 16,150 linear feet of 60-inch welded steel pipe that begins with its connection to the existing 96-inch Sepulveda Trunk Line and the 60-inch Stone Canyon Inlet Line within the Van Norman Complex property. The alignment would continue west along Rinaldi Street, south along Hayvenhurst Avenue, and west along Chatsworth, then continue south along Balboa Boulevard, where it would end at its final connection to Hayvenhurst Trunk Line Replacement Unit 2 just south of Devonshire Street. The project would also involve installation of appurtenant devices, including maintenance holes, valves, and blow-offs.

Stone Canyon & Sunset West Trunk Line Replacement Unit 2 Project

As previously discussed, the Stone Canyon & Sunset West Trunk Line Replacement Unit 2 Project consists of four trunk line replacement sections: Stone Canyon Reservoir Bypass, Somma (North and South), Westgate Sunset (East and West), and Westgate.

In the project's northern limit, the Stone Canyon Reservoir Bypass would install approximately 11,265 feet of 48-inch welded steel pipe that begins with its connection to the Lower Stone Canyon Reservoir. The alignment continues south along Stone Canyon Boulevard unit it reaches its final required connection to the existing Westgate Sunset Trunk Line East near the Stone Canyon Road and Sunset Boulevard intersection.

In the project's eastern limit, the Westgate Sunset Trunk Line Replacement East's would install 4,300 feet of 48-inch welded steel pipe that begins with its connection to the Stone Canyon Sunset West Trunk Line Replacement Unit 1 300 feet south of the intersection of Sunset Boulevard and Marymount Place. The Westgate Sunset Trunk Line Replacement East would continue west along Sunset Boulevard to its connections near Westwood Plaza: the Westwood & Sunset (UCLA) Regulator Station and Sunset & Westwood Regulator Station. Continuing along Sunset Boulevard, the Westgate Sunset Trunk Line Replacement East would connect to the Somma Trunk Line Replacement South just south of Bellagio Road.

Proceeding past the Somma Trunk Line Replacement South connection, the Westgate Sunset Trunk Line Replacement East would transition into Westgate Sunset Trunk Line Replacement West. The Westgate Sunset Trunk Line Replacement West would install approximately 6,900 feet of 36-inch welded steel pipe that begins at the Somma Trunk Line connection and continues west along Sunset Boulevard, until reaching the Sunset Boulevard bridge that crosses over the I-405 Freeway. At this location, the Westgate Sunset Trunk Line Replacement West would connect to an existing 36-inch welded steel pipe that was installed as part of the I-405 Sepulveda Pass Widening Project in 2013. The use of this existing pipe is beneficial to the Stone Canyon Sunset West Trunk Line Replacement Unit 2, as it would reduce the replacement footage by approximately 620 feet and eliminate the need to procure an encroachment permit from the State of California. Just west of the Sunset Boulevard bridge, the Westgate Sunset Trunk Line Replacement West would resume and travel southwest on Sunset Boulevard until Sunset Boulevard and South Barrington Place at the project's western terminus.

The Somma Trunk Line Replacement North would install approximately 7,628 feet of 35-inch welded steel pipe that begins with its connection to the Stone Canyon Reservoir Bypass Trunk Line Replacement at the intersection of Somma Way and Stone Canyon Road. The alignment would continue west along Somma Way and along an easement between Somma Way and Stradella Road, then briefly intersect Stradella Road and continue west along an easement

between Stradella Road and Chantilly Road before turning south on Chantilly Road, then continue south along Chalon Road and Tarcuto Way and proceed along an easement that traverses Bel Air Country Club towards the intersection of Bellagio Road and Bellagio Way.

Continuing east along Sunset Boulevard, the Somma Trunk Line Replacement North alignment would connect to the Westgate Trunk Line Replacement East along Sunset Boulevard between Bellagio Way and Veteran Way. Proceeding past the Westgate Sunset Trunk Line Replacement East connection, Somma Trunk Line Replacement North would transition into the Somma Trunk Line Replacement South. The Somma Trunk Line Replacement South would install approximately 6,181 feet of 48-inch pipe that begins with its connection to the Westgate Sunset Trunk Line Replacement East. The alignment would continue south along Veterans Way until reaching its connection to the Gayley and Veteran Regulator Station just west of the intersection of Veteran Avenue and Montana Avenue. At the project's southern limit, the Somma Trunk Line Replacement alignment would continue west along Montana Avenue and then north onto Beloit Avenue until reaching its final required connection to Westgate Trunk Line Replacement just south of Farlin Street. The Westgate Trunk Line Replacement would install approximately 1,800 feet of 35-inch welded steel pipe that begins at Beloit Avenue, south of Farlin Street, and continues west until reaching its connection to an existing 36-inch butterfly valve immediately upstream of Sunset and Barrington Regulator Station.

Sunset Trunk Line Replacement Project

The Sunset Trunk Line Replacement Project would install approximately 34,027 feet of ERDIP and welded steel pipe in total, including 20,628 feet of 36-inch ERDIP and welded steel pipe from the intersections of Sunset Boulevard and Sierra Drive to Fountain Avenue and Cole Avenue, 1,400 feet of 16-inch ERDIP along Harper Avenue and Roxbury Road, 600 feet of 24-inch welded steel inlet/outlet pipe along Cole Avenue and La Mirada Avenue, and 13,399 feet of 30-inch and 24-inch ERDIP and welded steel pipe from Fountain Avenue and Cole Avenue to Sunset Boulevard and Lyman Place. To support the Sunset Trunk Line Replacement, a proposed regulator station, the Cole and Fountain Regulator Station, would be installed along Cole Avenue south of Fountain Avenue.

The alignment would begin at its connection to the Sunset Trunk Line at the intersection of Sunset Boulevard and Sierra Drive, then continue east along Sunset Boulevard, which transitions into Holloway Drive, then turn north along Hacienda Place, and then east along Fountain Avenue. The alignment would continue north onto Harper Avenue and then Roxbury Road to connect to the Roxbury Pump Station. Proceeding past the intersection of Harper Avenue and Fountain Avenue, the alignment would continue east along Fountain Avenue until its next connection to the Sycamore Trunk Line at Sycamore Avenue, then continue east along Fountain Avenue. The alignment would then continue south along Cole Avenue where it would connect to the proposed Cole and Fountain Regulator Station and to the existing 36-inch Hollywood Outlet Line along La Mirada at Cahuenga Boulevard.

Proceeding past the intersection of Cole Avenue and Fountain Avenue, the alignment would continue along Fountain Avenue, north along Tamarind Avenue, then east along Sunset Boulevard, where it would connect to the existing Van Ness and Sunset Regulator Station. Continuing along Sunset Boulevard, the alignment would end at its final connection to the Sunset Trunk Line at Lyman Place. The project would also include the installation of 18,480 feet of 12-inch parallel mainline replacements along Sunset Boulevard from Lyman Place to Tamarind Avenue, along Santa Monica Boulevard from Formosa Avenue to Laurel Avenue, and along Sunset Boulevard from Horn Avenue to Sierra Drive.

1.5.4 Other Trunk Line Facilities

Sunset Trunk Line Replacement Project - Cole and Fountain Regulator Station

Due to the proposed alignment of the Sunset Trunk Line Replacement Project, a new inlet/outlet line connecting to the Sunset and Cahuenga Regulator Station just east of the Sunset Boulevard and Cahuenga Boulevard intersection would be required; however, existing substructures on Cahuenga Boulevard restrict the minimum subsurface corridor allowed for the required pipe size. As such, a new Regulator Station closer to the Sunset Trunk Line Replacement Project alignment is proposed. The Sunset and Cahuenga Regulator Station would be downsized but would remain in service as an emergency backup regulator station. The Sunset Trunk Line Replacement Project would include installation of approximately 600 feet of 24-inch welded steel inlet/outlet pipeline along Cole Avenue and La Mirada Avenue between the connection with the Sunset Trunk Line Replacement Project on Fountain Avenue and the connection to the Hollywood Outlet Line on Cahuenga Boulevard. The final regulator station location may be subject to change as Sunset Trunk Line Replacement Project design progresses.

1.6 Project Construction

Construction duration for each trunk line segment of the six priority projects and any future trunk line replacement would vary depending on the length of the alignment and installation of any necessary appurtenances. Construction would generally occur between the hours of 7:00 A.M. and 5:00 P.M., Monday through Friday, with potential Saturday and nighttime work. Nighttime work may be needed during construction ; however, in the event that construction is required to extend beyond regular daytime hours, extended hours permits would be required. The open trench construction would progress along the alignment at a rate of up to approximately 40 linear feet of pipeline installation per day, with a maximum of 200 feet of open trench along the roadway at any time. Existing trunk line segments would either be removed after installation of new trunk line segments or would be abandoned and left in place; however, existing trunk lines would remain in service during construction. As such, interruptions in water service would not generally occur during the construction process.

Potential off-site staging areas may be used during construction; however, staging areas would be located adjacent or in close proximity to the proposed project alignment and would be utilized solely to store construction equipment and materials and stage office trailers.

Construction would generally involve two crews of approximately eight workers each. During construction, the soils would be excavated and hauled off site. Slurry would be imported throughout the construction process for use as backfill. Daily vehicular trips throughout construction would occur as follows: a maximum of 10 round trips per day for transportation of construction equipment to and from the work areas when necessary; approximately 25 round trips per day for transportation of construction workers to and from the work areas (2 crews); and 20 round trips per day for haul trucks transporting materials including the import of cement-slurry (i.e. dump trucks). Partial or full lane closures would be necessary for installing the new pipeline, but it is anticipated that a minimum of one travel lane in each direction adjacent to the work zone and local access would generally be maintained throughout construction.

1.6.1 Pipeline Construction Methods

Installation of the trunk line segments would typically be completed using one of two primary construction methods, including open trench construction and trenchless construction. The majority of the pipeline within a trunk line segment would be installed via open trench construction. Trenchless construction would be employed to avoid disruptions at major intersections, protect

potential resources along an alignment, and/or for channel, creek, or freeway crossings. Trenchless construction methods that could be used include jack and bore, open shield pipe jacking, structural lining, and horizontal directional drilling. The open trench and trenchless construction methods that could be used for pipeline installation under the proposed project are described below.

Open Trench Construction

The majority of the pipeline within a given alignment would be installed using an open trench method of construction. This method allows for minimization of conflicts with existing subsurface utilities as well as ease of access for future maintenance and repair due to relatively shallow installation depths. In general, the process consists of site preparation, excavation and shoring, pipe installation and backfilling, and work site restoration. Work zones would be established in the road ROW within which open trench construction activities could proceed unimpeded. Construction typically occurs within an approximately 1,100-footlong work zone, within traffic lanes. Two-way travel along the affected roadways would be maintained throughout construction. However, on-street parking lanes may temporarily be eliminated adjacent to the work zone. Construction would progress along the alignment with the maximum length of open trench being 200 feet in length at any one time. The trenches would be temporarily barricaded with K-rail to minimize safety concerns. The following is a description of the phases of construction for open trench excavation.

Site Preparation

Work zones would be established for the minimum width required to accommodate the trench, shoring required to stabilize the trench walls, safety buffers around the trench, barricades separating traffic from construction activities, and adequate area to safely and effectively operate equipment and trucks and allow flexibility to avoid existing substructures in the road ROW. The work zone would allow for continuous installation of pipeline in longer segments without requiring frequent disassembly and relocation of barricades, equipment, and construction support facilities and modification of traffic control methods. Lane transition zones would also be established extending outward from the work zone along the ROW to guide vehicular traffic into the travel lanes adjacent to the work zone.

Traffic control plans would be prepared in coordination with the City of Los Angeles Department of Transportation (LADOT), Los Angeles County of Public Works (LACPW), and California Department of Transportation (Caltrans) to delineate traffic lanes around work zones. Establishing the work zone would entail installing traffic controls, including restriping of lanes, signage, and traffic signal modifications, as necessary, to merge traffic and direct it safely around the work zone. K-rails and other traffic barricades or markers would be installed around the active work zone to demarcate the zone and provide a safe working area. Placing the K-rail barricades would typically require the use of a forklift. Mobilization would include delivering construction equipment and materials to the work zone and establishing other necessary personnel and construction support facilities.

Following establishment of the work zone or daily setup of traffic control, subsurface utility exploration would be conducted to identify the vertical and horizontal location of any underground utilities to be avoided, protected, or relocated during pipeline installation. This would involve core drilling a small-diameter hole in the pavement and removing soil with a vacuum truck to expose and locate utilities. Once subsurface utilities are identified and the precise trunk line alignment within the ROW is determined, work on the trench would begin.

Trenching and Pipe Installation

The existing pavement along the trunk line alignment would be cut with a concrete/asphalt saw cutter and then removed using equipment such as jackhammers, pavement breakers, excavators, and/or loaders. The pavement would be removed from the project site and recycled, reused as backfill material or pavement base material, or transported to an appropriate facility for recycling or disposal. A trench would be excavated along the alignment using backhoes, excavators, or other types of excavation equipment. Portions of the trench adjacent to any existing subsurface utilities may be manually excavated. The excavated soil would be immediately hauled off site, and up to approximately 150 CY of excavated soils would be removed per day.

The size of the trench required for an alignment would be up to approximately 10 feet wide and would range in depth from 8 feet to 15 feet below the ground surface. For trenches greater than 5 feet in depth, the walls would be supported with designed shoring systems in accordance with the requirements of the California Department of Industrial Relations, Division of Occupational Safety and Health (Cal/OSHA). Steel or wood sheeting between H-beams (e.g., beam and plate), amongst other similar methods, may also be used for shoring. Utilities not relocated prior to trenching would be supported as excavation and shoring occurs. If construction occurs in areas with high groundwater, either a watertight shoring system would be implemented, or the groundwater would be removed during the excavation of the trenches typically by pumping it from the ground through dewatering wells that have been drilled along the alignment. The extracted groundwater would first be treated for any contaminants, if present, before being discharged to the storm drain system or to the sewer system under applicable permit requirements.

Once a sufficient length of trench has been excavated and shored, pipe laying would commence. Pipe segments would be lowered into the trench using a crane and joined to the preceding pipe segment. Once a pipe joint is complete, bedding material (sand or cement slurry) would be poured over it. The amount of pipe installed in a single day is expected to range from 20 feet to 40 feet per day. Prior to backfilling, appurtenant structures, such as valves, meters, and maintenance holes, would be installed as required. After laying the pipe and installing appurtenances, the trench would be backfilled with cement slurry to just below the top of pavement. It is anticipated that no more than 200 feet of trench would be left un-backfilled at the end of each work day. After trench backfilling, the shoring materials would be extracted. After several hundred feet of trench have been backfilled, the roadway would be repaved to the level of the surrounding road surface. Any portion of the roadway removed or damaged as a result of construction activities would be restored, repaved, and restriped in accordance with City standards.

Trenchless Construction

The trenchless construction methods described below are various forms of tunneling, which would be used to reduce traffic disruptions at busy intersections and to extend underneath features along an alignment that are not suitable for open-trench construction. Tunneling could occur at major intersections to reduce disruptions to local traffic, under channel or freeway crossings, or in other areas with varying topographical features.

Site Preparation

Site preparation activities for the trenchless construction methods would follow a similar process as described for the open trench method above. Work zones would be established to encompass active construction areas, operational safety buffers, and equipment and trucks, and to place barricades between the work zone and vehicular traffic. Traffic control plans would be prepared in coordination with LADOT, LACPW, and Caltrans to delineate traffic lanes around work zones and to modify any turn lane pockets affected by the proposed project at major intersections.

Typically, a minimum of one travel lane in each direction adjacent to the work zone and local access would be maintained throughout construction.

Tunneling Methods for Pipe Installation

Depending on the alignment for a particular trunk line and the particular resources, features, and topography along the alignment, one or a combination of tunneling methods may be used, including jack and bore, open shield pipe jacking, structural lining, and horizontal directional drilling, which are described below. Each of these methods would require the use of pits on either side of the section of pipeline to be installed. A jacking or launching pit would be located at one end and equipment would be lowered into it to tunnel and feed pipe segments. A receiving pit would be located at the other end to receive the pipe segment and tunneling equipment. The work zones surrounding each launching and receiving location would overlap in location with the adjacent open-trench work zone; however, both work zones would not be active at the same time. Additionally, tunneling methods are limited in length to approximately 1,000 feet. As such, if a trunk line segment requires tunneling spanning longer than 1,000 feet, intermediate launching and receiving pits would be required in addition to pit at each end of the tunneled segment.

Connecting Tunneled Pipe Segments to Open Trench Pipe Segments

Pipe segments installed using the open trench method are installed at a shallower depth than those using one of the tunneling methods. As such, after a pipe segment are entirely installed within a tunnel, a section of pipe would be installed using the open trench method to provide the vertical transition required to connect to the adjacent open trench trunk line installation.

Work Zone Restoration

Following completion of the pipe installation at the jacking locations and connection of the pipeline to adjacent trenches, the shoring system would be disassembled as the pits are backfilled with soil or slurry, the soil would be compacted, and the pavement would be restored. Once the pavement is complete, the traffic delineation (restriping) would be restored, construction barriers would be removed, and the section of road would be reopened to traffic.

1.6.2 Pipeline Connections, Testing, and Commissioning

New trunk lines and mainlines would be connected to the existing trunk line network to ensure redundancy within the water distribution system.. Hydrostatic testing would be conducted periodically throughout construction and would require discharge of water during the test event. Additional water may need to be discharged in order to evacuate the air pockets in the pipe. Hydrostatic test water would be discharged to the storm drain system in accordance with the Los Angeles Regional Water Quality Control Board dewatering permit requirements or to the sewer system per Sewer Capacity Availability Review Permit requirements. Once hydrostatic testing is completed, the new pipelines would be flushed and disinfected. Once a new trunk line is commissioned, the existing trunk line that is replaced would be decommissioned and disconnected from supply lines.

1.6.3 Other Trunk Line Facilities

Sunset Trunk Line Replacement Project - Cole and Fountain Regulator Station

The installation of the inlet/outlet pipeline along Cole Avenue and La Mirada Avenue for the Sunset Trunk Line Replacement Project would be installed using the open-trench construction method.

1.6.4 Priority Trunk Line Replacement Projects

The priority trunk line replacement projects would use the following construction methods:

- **Alameda Feeder No. 2:** Open-trench construction with pipe jacking located at or near the following locations: Dominguez Channel and Alameda Street, Sepulveda Boulevard and Alameda Street, Pacific Coast Highway and Alameda Street, Watson Road and Alameda Street, Rail road crossing along Alameda Street (north of O Street and Alameda Street), Two rail road crossings along Alameda Street (south of Robidoux Street and Alameda Street).

- **Effie-Sunset Trunk Line Replacement:** The installation would be a combination of open trench construction, in-line replacement, and pipe jacking. Pipe jacking is proposed at or near the following locations: the intersection of Sunset Boulevard, Hollywood Boulevard, Sunset Drive, Hillhurst Avenue, and Virgil Avenue; Temple Street and Alvarado; Temple Street and Union Avenue; Temple Street and Glendale Boulevard; Temple Street and the SR-110 Freeway; and Temple Street and Figueroa Street.

- **Franklin Baldwin Trunk Line Replacement Unit 1 & Baldwin Outlet Trunk Line Replacement Unit 1:** Open-trench construction method.

- **Hayvenhurst Trunk Line Replacement Unit 1:** Open trench construction method with pipe jacking at or near the following locations: from Van Norman Complex to Swinton Avenue and Rinaldi Street, passing Bull Creek; from Simonds Street and Hayvenhurst Avenue to San Fernando Boulevard and Hayvenhurst Avenue, passing the SR-118 Freeway; Devonshire Street and Balboa Boulevard.

- **Stone Canyon & Sunset West Trunk Line Replacements Unit 2:**

    - *Stone Canyon Reservoir Bypass Trunk Line Replacement Project:* Open-trench construction method.
    - *Somma Trunk Line North and South:* Open-trench construction method and structural lining tunneling method. Pipe jacking for the southern section is proposed at or near the I-405 Freeway.
    - *Westgate Sunset Trunk Line East and West:* Open-trench construction method.
    - *Westgate Trunk Line:* Structural lining tunneling method.

- **Sunset Trunk Line Replacement:** Open trench construction with pipe jacking at the following intersections: Holloway Drive and La Cienega Boulevard, Fountain Avenue and Crescent Heights Boulevard, Fountain Avenue and Crescent Heights Boulevard, Fountain Avenue and Fairfax Avenue, Fountain Avenue and Highland Avenue, Fountain Avenue and Cahuenga Boulevard, Sunset Boulevard and Western Avenue, and Sunset Boulevard and Normandie Avenue.

1.6.5 Construction Best Management Practices

To minimize potential traffic and transportation disruptions, the construction of the proposed project would be conducted in accordance with the California Manual on Uniform Traffic Control Devices. Traffic control plans would be designed, reviewed, approved, and coordinated by LADOT and LACPW to allow acceptable levels of service, traffic safety, and emergency access to the site during construction. Equipment necessary for traffic control includes changeable

message signs, delineators, arrow boards, and K-rail; pavement marking and/or traffic signal modifications may also be implemented as part of the traffic control plans.

The pipeline design would include seismic resiliency analysis for all applicable project components. All phases of the proposed project would be required to conform to safety regulations, including those from Cal/OSHA.

Additional best management practices to be employed during construction of the proposed project include the following:

- The proposed project would implement Rule 403 dust control measures required by the South Coast Air Quality Management District (SCAQMD), which could include, but would not be limited to, the following BMPs:
    - Apply water in sufficient quantities to prevent the generation of visible dust plumes.
    - All haul trucks hauling soil, sand, and other loose materials shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions).
    - Ground cover in disturbed areas shall be replaced within 21 days of when work is completed in the area.
    - Non-toxic soil stabilizers shall be applied according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for five days or more).
    - Traffic speeds on all unpaved roads and within staging areas shall be limited to 15 miles per hour or less.
- A Storm Water Pollution Prevention Plan (SWPPP), which will include erosion and sediment Best Management Practices (BMPs), shall be developed and implemented for construction activities. The SWPPP may include, but would not be limited to, the following BMPs:
    - Minimizing the extent of disturbed areas and duration of exposure;
    - Stabilizing and protecting disturbed areas;
    - Keeping runoff velocities low; and
    - Retaining sediment within the construction area.
- Construction erosion control BMPs may include the following:
    - Temporary desilting basins;
    - Silt fences;
    - Gravel bag barriers;
    - Temporary soil stabilization with mattresses and mulching;
    - Temporary drainage inlet protection; and
    - Diversion dikes and interceptor swales.

- Nesting Bird Surveys: If project activities are conducted during nesting bird season (typically defined as February through August), 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:
    - In the event an active nest is detected, a qualified biologist shall monitor the nest to determine if a nest avoidance buffer zone is necessary to restrict construction activities in proximity to the nest to protect the nest from failing. Any buffer zone, within which construction activities may not occur, shall be established in coordination with the qualified biologist, who shall take into account existing baseline conditions (e.g., topography, buffering buildings or other structures, etc.). In addition, observed avian response to ambient conditions (e.g., existing traffic noise and human activity) shall factor into the requirement for and size of a nest avoidance buffer.
- The proposed project may require a Los Angeles Regional Water Quality Control Board's (RWQCB) National Pollution Discharge Elimination System (NPDES) Construction Dewatering permit.
- Residences and businesses near the pipeline 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.
- The proposed project construction would incorporate source reduction techniques and recycling measures and maintain a recycling program to divert waste in accordance with the Citywide Construction and Demolition Debris Recycling Ordinance.

LADWP would coordinate with all applicable agencies regarding construction schedules and worksite traffic control and detour plans, including but not limited to LADOT, LACPW, Caltrans, the City of Los Angeles Department of Public Works, Bureau of Engineering, the City of Los Angeles Fire Department, and the City of Los Angeles Police Department.

1.7 Project Operation

1.7.1 Operation and Maintenance

The proposed replacement pipelines are anticipated to have an operational life of 100 years, and replacement valves are anticipated to have an operational life of 70 years.

The entire trunk line alignments would be located underground and would not be visible during operation. While in service, trunk lines would remain pressurized at all times to supply water to the surrounding service areas. Connections to various trunk lines would be opened as necessary to support the water transmission system. These functions would not require any additional supplies from the City's drinking water system.

Operational activities would be limited to scheduled maintenance and emergency repair. Maintenance activities would be minimal and would be similar to those that occur under existing conditions, including exercising valves and replacing or repairing worn appurtenances to ensure

proper performance over the life of the facilities. No additional permanent workers would be required to operate or maintain the trunk lines.

1.8 Required Permits and Approvals

Numerous approvals and/or permits would be required to implement the proposed program. This EIR would be used to facilitate compliance with federal and state laws and the granting of permits by various state and local agencies having jurisdiction over one or more aspects of the project. These approvals and permits may include, but may not be limited, to the following:

Federal Permits

- Federal Aviation Administration (FAA): Form FAA 7460-1, Notice of Proposed Construction or Alteration
- U.S. Army Corps of Engineers (USACE): 408 Permit for crossing of flood control facilities

State Permits

- Cal/OSHA, Mining and Tunneling Unit:
    - Tunnel classifications for construction operations covered under Section 8400 through 8469, Tunnel Safety Orders, of the California Code of Regulations
    - Permit for construction of trenches or excavations 5 feet or deeper that will be entered by construction workers
- California Department of Transportation (Caltrans): Encroachment Permit
- State Water Resources Control Board (SWRCB): Notice of Intent to comply with the General Construction Activity NPDES Permit (Order No. 2009-0009-DWQ, as amended by Order No. 2010-0014-DWQ, NPDES No. CAS000002)

Local Permits

- City of Los Angeles Bureau of Street Services: Street Closure Building Materials Permit Tree Removal Permits
- City of Los Angeles Bureau of Engineering: Excavation Permit, Peak Hour Exemptions, Holiday Moratorium Waiver, Sewer Capacity Availability Request
- City of Los Angeles Bureau of Sanitation: Sewer Capacity Availability Request
- City of Los Angeles Police Department: Night Noise Variance
- LACPW: Discharge Permit, Encroachment Permit, Excavation Permit, Holiday Moratorium Waiver, Utility Crossing Permit, approval of Traffic and Signal Control Plan, approval of temporary road closures
- LADOT: approval of Traffic and Signal Control Plan, approval of temporary road closures

- RWQCB:
    - Notice of Intent to comply with the General NPDES Permit for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters (Order No. R4-2013-0095, NPDES No. CAG994004)
    - Notice of Intent to comply with the General NPDES Permit for Discharges of Low Threat Hydrostatic Test Water to Surface Waters (Order No. R4-2009-0068, NPDES No. CAG674001)
    - NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities

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2 ENVIRONMENTAL DETERMINATION

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

CEQA INITIAL STUDY FORM

Project Title:
Trunk Line Replacement 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:
Alexandria Fortaleza
Environmental Specialist
Los Angeles Department of Water and Power
Alexandria.Fortaleza@ladwp.com
(213) 367-0871

Project Sponsor's Name and Address:
Los Angeles Department of Water and Power
111 N. Hope Street, Room 1044
Los Angeles, CA 90012

City Council District:
The proposed program would be located within the LADWP water distribution service area, which encompasses the City of Los Angeles and all 15 City Council Districts.

Neighborhood Council:
Multiple

Project Location:
The proposed program would be located within the LADWP water distribution service area, which encompasses the City of Los Angeles and surrounding areas.

General Plan Designation:
The trunk line system is generally located along public rights-of-way, which are generally designated by the Mobility Plan 2035 and include circulation classifications, and utility easements or sites containing existing water distribution system infrastructure, which occur on parcels with various general plan designations.

Zoning:
The trunk line system is generally located along public rights-of-way, which do not have zoning designations, and utility easements or sites containing existing water distribution system infrastructure, which occur on parcels with various zoning designations.

Description of Project:
The proposed program would modernize the potable water distribution system by replacing aging pipelines that are part of the City of Los Angeles's regional trunk line system by replacing, as necessary, trunk lines and connections with the appropriate pipe material and size and upgrade appurtenances to ensure safety, reliability, and redundancy of the system. The proposed program aims to ensure continued safe and reliable transportation and distribution of potable water to its customers throughout the City for residential, industrial, and firefighting purposes. Under the proposed program, six trunk line replacement projects have been identified as priority projects. The proposed project is expected to be implemented over approximately the next 30 years, with the six priority projects occurring in the near term (within the next 10 years).

Surrounding Land Uses and Setting:
The proposed program would be located within the LADWP water distribution service area, which encompasses the City of Los Angeles.

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 November 4, 2026

Signature Date

Eduardo Cuevas
Manager of Environmental Planning and Assessment
Los Angeles Department of Water and Power

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3 INITIAL STUDY CHECKLIST

3.1 Aesthetics

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from 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?

Less than Significant Impact. Scenic views or vistas are defined as panoramic public views of various natural features, including the ocean, striking or unusual natural terrain, or unique urban or historic features. Public access to these views may be from park lands, private and publicly owned sites, and public rights of-way (ROW).[4] The proposed program consists of replacing aging underground pipeline segments throughout the trunk line system and installation of associated appurtenances such as valves, meters, and maintenance holes to support operation and maintenance of trunk lines. During construction, scenic vistas, including mountain or ocean views and unique urban or historic features common in the City, may be temporarily obstructed due to the presence of construction activities, equipment, or staging areas. These effects would be temporary, and views would return to existing conditions once construction is complete. The trunk line alignments would be located entirely underground within the public ROW with the limited potential for appurtenances to be located above-ground. Any above-ground appurtenances would be minor and located in areas that have existing trunk line infrastructure such that any above-ground components would not obstruct scenic vistas. Implementation of the proposed program would not permanently alter public views or affect the public's ability to access or experience scenic vistas. Therefore, impacts would be less than significant, and this issue will not be further analyzed in the PEIR. For the same reasons described above, impacts to scenic vistas associated with the six priority projects would also be less than significant.

[4] City of Los Angeles Department of City Planning, *City of Los Angeles General Plan, Conservation Element*, adopted September 26, 2001.

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?

Less Than Significant Impact. 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.[5] The Topanga Canyon State Scenic Highway (State Route 27) overlaps a small portion of the City at the westernmost point in LADWP's Western District. There are four eligible scenic highways and one designated federal byway in the City. The City's Mobility Element of the General Plan, Mobility Plan 2035, also includes a map of locally designated scenic highways.[6]

There are currently four eligible scenic highways in the City, including: the Pacific Coast Highway from the City of Santa Monica to Ventura County; US-101 from Topanga Canyon Boulevard to the City of Santa Barbara area; State Route 118 from De Soto Avenue to Moorpark; and Interstate 210 from the Interstate 5 interchange to Pasadena. Additionally, the Arroyo Seco (State Route 110) is a federal byway from the City of Pasadena to US-101.[7,8]

As described in Section 3.1(a), the proposed program consists of replacing aging underground pipeline segments throughout the trunk line system in the public ROW and installation of associated appurtenances, some of which would be located above-ground. There is potential for construction activities to occur within or adjacent to designated scenic highways; however, any visual disturbance of existing scenic resources, such as trees, rock outcroppings, and historic buildings, would be temporary, limited to construction activities, equipment, and staging areas, and the area would return to existing conditions following construction. No scenic resources within a state scenic highway would be removed as a part of the proposed program. The trunk line alignments would be located entirely underground, and any above-ground appurtenances would be minor and located in areas that have existing trunk line infrastructure. As such, implementation of the proposed program would not damage scenic resources, including trees, rock outcroppings, or historic buildings, within a state scenic highway. Therefore, impacts would be less than significant, and this issue will not be further analyzed in the PEIR. For the same reasons described above, impacts to scenic resources associated with the six priority projects would also be less than significant.

5 California Department of Transportation. California State Scenic Highway System Map. Available at: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa, accessed March 23, 2026.

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

7 California Department of Transportation. California State Scenic Highway System Map. Available at: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa, accessed March 23, 2026.

8 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.

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?

Less Than Significant Impact. 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 replacement of aging underground pipeline segments throughout the trunk line system and the installation of associated appurtenances would primarily occur within the existing public ROW. As described in Section 3.1(b) above, trunk line alignments would be located underground, and any above-ground appurtenances would be minor and located in areas that have existing trunk line infrastructure. In urbanized areas, pipeline segment replacements would primarily be confined to existing paved road ROW or utility easements and thus, would not conflict with applicable zoning or other regulations governing scenic quality. In the event that pipeline segment replacements occur in non-urbanized areas, construction activities and trunk line alignments and appurtenances would similarly be located within existing paved road ROW or utility easements. As such, they would not substantially degrade the visual character or quality of public views. Therefore, impacts related to scenic quality and visual character in urban and non-urbanized areas would be less than significant, and this issue will not be further analyzed in the PEIR. For the same reasons described above, impacts to scenic quality and visual character associated with the six priority projects would also be less than significant.

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

Less Than Significant Impact. Construction activities under the proposed program would typically occur between the hours of 7:00 a.m. and 5:00 p.m., consistent with the allowable construction hours established under Los Angeles Municipal Code Section 41.40, which prohibits construction activities that would disturb nearby residential uses between the hours of 9:00 p.m. and 7:00 a.m.[9] However, limited nighttime construction may be needed to minimize traffic disruptions during peak traffic hours at major intersections, which may require some temporary nighttime lighting. Should night lighting be necessary, all lighting would be focused on the construction zone. Upon completion of construction activities, the proposed program would not introduce any permanent new sources of light or glare. Construction would occur primarily within developed areas that contain existing ambient lighting associated with surrounding development. The proposed program would replace aging underground pipeline segments throughout the trunk line system and would install associated appurtenances as required for operation and maintenance of the pipelines, none of which require permanent operational lighting.

[9] City of Los Angeles, Los Angeles Municipal Code, Chapter IV, Article 1, Disorderly Conduct, Section 41.40, Noise Due to Construction, Excavation Work – When Prohibited, available at: https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-128777, accessed September 2, 2026.

As construction lighting would be temporary and controlled, and no permanent lighting would be installed, implementation of the proposed program would not create a new source of substantial light or glare that would adversely affect daytime or nighttime views. Therefore, impacts would be less than significant, and this issue will not be further analyzed in the PEIR. For the same reasons described above, impacts to light and glare associated with the six priority projects would also be less than significant.

3.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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:				
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?

No Impact. According to the "Important Farmland in California" map prepared by the California Department of Conservation pursuant to the Farmland Mapping and Monitoring Program, the vast majority of the City of Los Angeles is designated as Urban and Built-up Land.[10] While specific replacement projects implemented under the proposed program may cross parcels designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, construction and most permanent program components would be located primarily within existing paved road ROW or utility easements that have previously been disturbed and would not change surrounding land uses or zoning of adjacent parcels. Because the proposed program would not result in the permanent conversion of Farmland to non-agricultural use, no impact would occur. This issue will

[10] California Department of Conservation, California Important Farmland Finder, available at: https://maps.conservation.ca.gov/dlrp/ciff/, accessed March 20, 2026.

not be further analyzed in the PEIR. For the same reasons described above, no impacts to permanent conversion of Farmland to non-agricultural use associated with the six priority projects would occur.

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

No Impact. Los Angeles County, including parcels within the City of Los Angeles boundary, does not offer Williamson Act contracts; therefore, no program components would occur on land under Williamson Act enrollment.[11] While specific projects implemented under the proposed program may cross areas zoned for agricultural use, construction and most permanent program components would be located primarily within existing paved road ROW or utility easements that have been previously disturbed and would not change existing zoning for agricultural use of adjacent parcels. Therefore, implementation of the proposed program would not conflict with existing zoning for agricultural use or a Williamson Act contract, and no impact would occur. This issue will not be further analyzed in the PEIR. For the same reasons described above, no impacts to existing zoning for agricultural use or a Williamson Act contract associated with the six priority projects would occur.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. Specific projects implemented under the proposed program may cross areas zoned for forest land, timberland, or Timberland Production; however, such designations are not typically present within the program area, which is primarily urban and built-up. Projects under the proposed program would occur primarily within existing paved road ROW or utility easements and would not conflict with existing zoning of adjacent parcels. Therefore, implementation of the proposed program would not conflict with existing zoning for, or cause a rezoning of, forest land, timberland, or timberland zoned Timberland Production. No impact would occur, and this issue will not be further analyzed in the EIR. For the same reasons described above, no impacts to zoning of forest land, timberland, or Timberland Production associated with the six priority projects would occur.

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

No Impact. As discussed in Section 3.2(c) above, specific projects under the proposed program may cross areas zoned for forest land. However, they would occur primarily within existing paved road ROW or utility easements that have been previously disturbed and would not result in the permanent removal of forest land or conversion of forest land to non-forest uses. Construction activities would be temporary, and no long-term land use changes would occur. Therefore, no impact would occur, and this issue will not be further analyzed in the EIR. For the same reasons described above, no impacts to the loss of forest land or conversion of forest land to non-forest use associated with the six priority projects would occur.

[11] State of California Department of Conservation, Division of Land Resource Protection, DLRP Important Farmland Finder Map, available at: https://maps.conservation.ca.gov/dlrp/WilliamsonAct/, accessed March 20, 2026.

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

No Impact. As discussed in Sections 3.2(a) through 3.2(d) above, specific replacement project alignments under the proposed program may be located adjacent to areas designated as Farmland or zoned for agricultural or forest land. However, replacement projects would occur primarily within existing paved road ROW or utility easements that have been previously disturbed and would not alter surrounding land uses, drainage patterns, or access in a manner that could indirectly induce the conversion of Farmland or forest land. Therefore, implementation of the proposed program would not change the existing environment in a way that would result in the conversion of Farmland to non-agricultural use or forest land to non-forest use, and no impact would occur. This issue will not be further analyzed in the PEIR. For the same reasons described above, no impacts to conversion of the existing environment from Farmland to non-agricultural use or forest land to non-forest use associated with the six priority projects would occur.

3.3 Air Quality

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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:				
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?

Potentially Significant Impact. The South Coast Air Quality Management District (SCAQMD) is responsible for monitoring and regulating air quality within the South Coast Air Basin, including Los Angeles County and the City, and for preparing an Air Quality Management Plan (AQMP) to achieve air quality standards. The proposed program consists of replacing aging underground pipeline segments throughout the trunk line system and the installation of associated appurtenances. Construction and operation of the proposed program would generate air pollutant emissions; however, operational activities associated with the proposed program are not expected to generate substantial air pollutant emissions because the proposed program consists of replacing existing water conveyance infrastructure and would not generate new operational vehicle trips or other substantial sources of air emissions. An air quality assessment will be prepared to analyze the potential air quality impacts for the proposed program, including the six priority projects, and their consistency with the AQMP. A detailed analysis of this issue will be included 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?

Potentially Significant Impact. Specific projects implemented under the proposed program would generate short-term air pollutants during construction activities, including exhaust from construction equipment, worker commute trips, and fugitive dust generated during ground-disturbing activities. Construction emissions may also result from the transport of equipment, materials, and excavated soils associated with pipeline replacement activities. Operational activities associated with the proposed program are not expected to generate substantial air pollutant emissions because the proposed program consists of replacing existing water conveyance infrastructure and would not generate new operational vehicle trips or other substantial sources of air emissions. An air quality assessment will be prepared for the proposed

program, including the six priority projects, and will address the potential for cumulatively considerable air quality impacts. A detailed analysis of this issue will be included in the PEIR.

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

Potentially Significant Impact. Some populations and land uses are considered more sensitive to air pollutants than others. The California Air Resources Board has identified the following groups who are most likely to be affected by air pollution: children under 14 years of age, adults over 65 years of age, athletes, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. Some of these populations and land uses may be located near specific projects implemented under the proposed program, and construction activities such as excavation, equipment operation, and material hauling could generate temporary emissions and fugitive dust in proximity to these receptors. An air quality assessment will be prepared for the proposed program, including the six priority projects, and will evaluate the potential for sensitive receptors to be exposed to substantial pollutant concentrations during program implementation. A detailed analysis of this issue will be included in the PEIR.

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

Less Than Significant Impact. Potential sources that may produce objectionable odors during construction activities include exhaust from vehicles or diesel equipment. Such odors may be a temporary source of nuisance to adjacent uses; however, odors from these sources would be localized and generally confined to the immediate area surrounding specific project alignments under the proposed program and would not persist beyond the termination of construction activities. The proposed program would utilize typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. In addition, as construction-related emissions dissipate away from construction areas, the odors associated with these emissions would also decrease and would be quickly diluted.

Operation of the proposed program would not be anticipated to generate new sources of objectionable odors, as proposed pipeline segment replacements throughout the trunk line system and installation of associated appurtenances would be located primarily underground, and any above-ground appurtenances are not expected to emit odors. Permanent blowoff assemblies would be installed at low points or dead ends to facilitate draining and flushing of trunk lines. At dead ends, these assemblies would allow water with limited circulation to be flushed from the system, helping to prevent bacterial growth and associated foul odor or taste within the water supply. As such, blowoff assemblies would support water quality maintenance and would not create objectionable odors affecting surrounding uses. Therefore, impacts related to odors would be less than significant, and this issue will not be further analyzed in the PEIR. For the same reasons described above, impacts to odors associated with the six priority projects would also be less than significant.

3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and 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?

Potentially Significant Impact. Sensitive plants include those listed as threatened or endangered, proposed for listing, or candidate for listing by the U.S. Fish and Wildlife Service (USFWS) and/or California Department of Fish and Wildlife (CDFW) or those listed by the California Native Plant Society (CNPS). Sensitive wildlife species are those species listed as threatened or endangered, proposed for listing, or candidate for listing by USFWS and/or CDFW, or considered special status by CDFW. Sensitive habitats are those that are regulated by USFWS, U.S. the Army Corps of Engineers (USACE), and/or those considered sensitive by CDFW.

The proposed program consists of replacing aging underground pipeline segments throughout the trunk line system in the public ROW, and installation of associated appurtenances, some of which would be located above-ground in areas that have existing trunk line infrastructure. However, projects implemented under the proposed program could affect sensitive species, either directly or through habitat modification. A biological resources technical report will be prepared for the proposed program, including the six priority projects, to evaluate potential impacts to sensitive and/or special status species. A detailed analysis of this issue will be included 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?

Potentially Significant Impact. The trunk line replacements would be located underground within existing public ROW with the limited potential for appurtenances to be located above-ground in areas that have existing trunk line infrastructure. However, specific replacement projects implemented under the proposed program may be located adjacent to riparian habitat or other sensitive natural communities. A biological resources technical report will be prepared for the proposed program, including the six priority projects, to assess the program's potential to result in impacts to riparian habitat or other sensitive natural communities. A detailed analysis of this issue will be included 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?

Potentially Significant Impact. The program area contains a range of wetland habitat types, as identified by the USFWS National Wetlands Inventory.[12] An assessment of the potential to impact jurisdictional waters and wetlands, including the potential to impact state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means, will be prepared for the proposed program, including the six priority projects. A detailed analysis of this issue will be included 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?

Potentially Significant Impact. In an urban context, a wildlife movement 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 resources, thereby encouraging population growth and diversity. A biological resources technical report will be prepared for the proposed program, including the six priority projects, to assess the program's potential to interfere with the movement of native resident or migratory fish or wildlife species, established wildlife corridors, or the use of native wildlife nursery sites. A detailed analysis of this issue will be included in the PEIR.

[12] United States Fish and Wildlife Service, National Wetlands Inventory Mapper, available at: https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/, generated March 20, 2026.

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

Less Than Significant Impact. Implementation of the proposed program 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 (*Quercus dumosa*)]; southern California black walnut (*Juglans californica*); western sycamore (*Platanus racemosa*); and California bay (*Umbellularia californica*) (Section 17.02 of City of Los Angeles Municipal Code). In December 2020, the City approved Ordinance No. 186873 and added two native shrub species, Mexican elderberry (*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 cumulative 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. For the same reasons described above, impacts to local policies or ordinances protecting biological resources associated with the six priority projects would also be less than significant.

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

No Impact. No adopted Habitat Conservation or Natural Community Conservation Plans coincide with the boundaries of the City. Portions of the City, and thus, some existing trunk lines, distribution mainlines, and various appurtenances, are located within the boundaries of a Significant Ecological Area as designated in 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 the provisions of the Significant Ecological Area program would not apply to components of the proposed program, which would be located in incorporated areas of Los Angeles County. Therefore, no impact related to such plans would occur with implementation of the proposed program, and this issue will not be further analyzed in the PEIR. For the same reasons described above, no impacts to habitat conservation plans associated with the six priority projects would occur.

3.5 Cultural Resources

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

Discussion

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

Potentially Significant Impact. Specific projects implemented under the proposed program may be located adjacent to or within the vicinity of historical resources in the City. A cultural resources technical report will be prepared for the proposed program, including the six priority projects, which will assess potential impacts to historical resources, including potential substantial adverse changes in the significance of such resources. A detailed analysis of this issue will be included in the PEIR.

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

Potentially Significant Impact. The proposed program would require ground-disturbing activities during construction, including excavation, shoring, trenching, and tunneling for pipeline replacements. As described in Chapter 1, Project Description, the majority of pipeline segments along a given alignment would be installed using open trench construction, which involves site preparation, excavation and shoring, pipe installation and backfilling, and worksite restoration. Trenchless construction methods, including jack and bore, open shield pipe jacking, structural lining, and horizontal directional drilling, may also be used at major intersections to protect potential resources along an alignment, or for channel, creek, or freeway crossings. These ground-disturbing activities could disturb previously undisturbed soils and encounter buried archaeological resources. Therefore, a cultural resources technical report will be prepared for the proposed program, including the six priority projects, which will assess potential impacts to archaeological resources. A detailed analysis of this issue will be included in the PEIR.

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

Potentially Significant Impact. The trunk line alignments would be located underground within existing public ROW with the limited potential for appurtenances to be located above-ground in areas that have existing trunk line infrastructure. These areas are built out and highly disturbed due to past construction activities, and do not contain cemeteries or known human burial sites.

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 alignment while consultation and treatment are conducted.

While projects under the proposed program, including the six priority projects, would adhere to regulatory requirements, as the proposed program would include ground-disturbing activities, there is potential to disturb human remains. A detailed analysis of this issue will be included in the PEIR.

3.6 Energy

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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?

Potentially Significant Impact. During construction, energy use associated with the installation of pipeline segments and appurtenances would include transportation fuel for worker vehicle trips, haul trucks, and off-road construction equipment, as well as electricity for construction staging and testing activities. During operation, energy use would be limited, as the proposed program consists of trunk line replacements and would not introduce new facilities requiring substantial ongoing electricity or natural gas consumption. An energy analysis will be prepared for the proposed program, including the six priority projects, to assess energy consumption during short-term construction and long-term operational activities and to identify the potential for wasteful, inefficient, or unnecessary consumption of energy resources. A detailed analysis of this issue will be included in the PEIR.

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

Potentially Significant Impact. Applicable plans for renewable energy and energy efficiency include the City of Los Angeles Green New Deal and the California Energy Efficiency Strategic Plan, among others. An energy analysis will be prepared for the proposed program, including the six priority projects, to evaluate the consistency of proposed activities under the program with applicable renewable energy and energy efficiency plans. A detailed analysis of this issue will be included in the PEIR.

3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative 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.

Less Than Significant Impact. The "Alquist-Priolo Earthquake Fault Zoning Act" is a state law that regulates development projects near active faults to mitigate the hazard of surface fault rupture. According to the California Geological Survey (CGS), the City of Los Angeles and

surrounding portions of Los Angeles County contain numerous Alquist-Priolo Fault Hazard Zones.[13] Specific replacement projects implemented under the proposed program may be located within or near these mapped fault hazards; however, the proposed program does not involve the development of habitable structures that would expose people to fault rupture hazards nor would it increase or exacerbate the potential for fault rupture to occur. Instead, the proposed program would consist of pipeline segment replacements throughout the trunk line system, especially in seismically active areas that would require replacing pipeline segments with pipe materials that can accommodate seismic loads created by ground displacement from an earthquake, such as welded steel or ERDIP, depending on what would be appropriate for site specific conditions. Construction would occur primarily within the existing road ROW or utility easements. Each trunk line replacement project implemented under the proposed program would include seismic resiliency analysis for all applicable project components. Additionally, all phases of the proposed project would be required to conform to safety regulations, including those from Cal/OSHA. Additionally, the trunk line replacements and installation of associated appurtenances would be constructed in accordance with the latest version of the City of Los Angeles Building Code and other applicable State and local seismic-related standards. Once construction is complete, the road ROW would be returned to existing conditions. As such, implementation of the proposed program would result in a less than significant impact related to rupture of a known earthquake fault, and this issue will not be further analyzed in the PEIR. For the same reasons described above, impacts to rupture of a known earthquake fault associated with the six priority projects would also be less than significant.

ii. Strong seismic ground shaking?

Less Than Significant Impact. Specific replacement projects implemented under the proposed program may be located within or adjacent to seismically active areas of the Southern California region and would therefore be subject to strong seismic ground shaking. As discussed in Section 3.7(a)(i) above, the proposed program does not include the construction of any habitable structures that could expose people to seismic-related injury. Instead, the proposed program consists of pipeline segment replacements throughout the trunk line system and installation of associated appurtenances, primarily within existing road ROW or utility easements. As part of the route study conducted for each trunk line replacement project, LADWP would conduct hydraulic analyses and geotechnical and geologic assessments to identify geologic hazards that could affect route selection and to minimize trunk line risk exposure associated with seismic hazards. All components under the proposed program would be designed and constructed in accordance with the latest version of the applicable building code such as the City of Los Angeles Building Code or Los Angeles County Building Code, as applicable, and other applicable federal, State, and local codes associated with seismic criteria. Additionally, where appropriate, the proposed program would replace the existing trunk lines with a pipe design that is more resistant to earthquake-induced ground failure, including seismic ground shaking. As such, implementation of the proposed program would result in a less than significant impact related to strong seismic ground shaking, and this issue will not be further analyzed in the PEIR. For the same reasons described above, impacts to strong seismic ground shaking associated with the six priority projects would also be less than significant.

[13] California Geological Survey, Earthquake Zones of Required Investigation Data Viewer, available at: https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed March 20, 2026.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction occurs when loosely packed, water saturated sediments at or near the ground surface lose their strength in response to strong or extended periods of seismic shaking. Liquefied sediments lose strength, in turn causing the failure of adjacent structures. Alignments of replacements projects implemented under the proposed program may cross areas within the City of Los Angeles and portions of Los Angeles County known to be susceptible to liquefaction. However, as discussed above, all components under the proposed program would be designed and constructed in compliance with the latest version of the applicable building code, such as the City of Los Angeles Building Code or Los Angeles County Building Code, as applicable, and other applicable federal, State, and local codes to minimize impacts related to seismic ground failure, including liquefaction. The proposed program involves replacing aging underground pipeline segments throughout the trunk line system, including in seismically active areas, to accommodate seismic loads created by ground displacement from earthquakes. As part of the route study conducted for each trunk line replacement project, LADWP would conduct a preliminary geotechnical and geologic assessment to identify geologic hazards, including liquefaction potential, that could affect route selection and minimize trunk line risk exposure. Additionally, where appropriate, the proposed program would replace the existing trunk lines with a pipe design that is more resistant to earthquake-induced ground failure, including liquefaction. Following adherence with existing regulations, impacts would be less than significant, and this issue will not be further analyzed in the PEIR. For the same reasons described above, impacts to seismic-related ground failure associated with the six priority projects would also be less than significant.

iv. Landslides?

Less Than Significant Impact. Landslides occur with the movement of a mass of rock, debris, or earth down a slope. Projects implemented under the proposed program may cross designated landslide areas within the City of Los Angeles and portions of Los Angeles County within the program area.[14] However, as discussed above, all components under the proposed program would be designed and constructed in compliance with the latest version of the applicable building code, such as the City of Los Angeles Building Code or Los Angeles County Building Code, and other applicable federal, State, and local codes to minimize impacts related to slope instability and landslides. The proposed program would replace aging underground pipeline segments throughout the trunk line system with modern materials and designs that would provide improved performance under geological ground movement. As part of the route study conducted for each trunk line replacement project, LADWP would conduct a preliminary geotechnical and geologic assessment to identify geologic hazards, including landslide and slope-stability hazards, that could affect route selection and to minimize trunk line risk exposure. Following adherence with existing regulations, impacts would be less than significant, and this issue will not be further analyzed in the PEIR. For the same reasons described above, impacts to landslides associated with the six priority projects would also be less than significant.

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

Less Than Significant Impact. Construction activities under the proposed program would include ground-disturbing activities, such as trenching, excavation, pipe installation, and trenchless construction methods, that could result in the potential for erosion to occur at individual

[14] Los Angeles County, Landslide Zones, available at: https://www.arcgis.com/apps/mapviewer/index.html?layers=306103cb524845368d5ae2923fbdccb3, accessed March 23, 2026.

project sites. However, the proposed program would be required to prepare and implement project-specific SWPPPs, which would identify BMPs to prevent substantial erosion or loss of topsoil. As described in Chapter 1, Project Description, SWPPPs may include measures such as minimizing the extent and duration of disturbed areas, stabilizing and protecting disturbed soils, retaining sediment within construction areas, and implementing erosion-control BMPs such as temporary desilting basins, silt fences, gravel bag barriers, temporary soil stabilization measures, drainage inlet protection, and diversion dikes or interceptor swales. In addition, individual replacement projects under the proposed program would comply with the SCAQMD Rule 403 for dust control. If dewatering is necessary during construction, projects under the proposed program would also obtain a RWQCB NPDES Construction Dewatering permit prior to discharge. Compliance with existing regulations for erosion control and implementation of project-specific BMPs, including for the six trunk lines, would ensure a less than significant impact. 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?

Less Than Significant Impact. Lateral spreading is a type of liquefaction-induced ground failure on mildly sloping ground. Projects implemented under the proposed program may cross liquefaction and landslide zones within the City of Los Angeles and portions of Los Angeles County within the program area and may be susceptible to lateral spreading, subsidence, or collapse. However, as discussed above in Sections 3.7(a)(iii) and 3.7(a)(iv), the proposed pipeline segment replacements and installation of associated appurtenances would be designed and constructed in compliance with the latest version of the applicable building code, such as the City of Los Angeles Building Code or Los Angeles County Building Code, and other applicable federal, State, and local codes to minimize impacts related to unstable soil conditions, including liquefaction, landslides, lateral spreading, subsidence, and collapse. Additionally, the proposed program would replace aging underground pipeline segments throughout the trunk line system with modern materials and designs that are more resistant to earthquake-induced ground failure, including lateral spreading. As part of the route study conducted for each trunk line replacement project, LADWP would conduct a preliminary geotechnical and geologic assessment to identify unstable soil conditions and other geologic hazards that could affect route selection and to minimize trunk line risk exposure. Following adherence to existing regulations, impacts related to unstable soils, including lateral spreading, subsidence, and collapse, would be less than significant.

Subsidence is the lowering of surface elevation due to changes occurring underground, such as the extraction of large amounts of groundwater. When groundwater is extracted from aquifers at a rate that exceeds the rate of replenishment, overdraft occurs, which can lead to subsidence. Trench excavation for pipeline replacements may occur in areas with shallow groundwater depths; therefore, groundwater may be encountered during construction, and temporary dewatering may be required to establish a stable working environment. If construction activities associated with a specific replacement project would disturb more than one acre, LADWP would be required to obtain coverage under a Construction Stormwater General Permit (SWRCB Order No. 2022-0057-DWQ) (Construction General Permit).[15] The Construction General Permit includes

[15] State Water Resources Control Board, National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities, Order WQ 2022-0057-DWQ, NPDES No. CAS000002, adopted September 8, 2022, available at: https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2022/wqo_2022-0057-dwq.pdf, accessed September 8, 2026.

requirements for stormwater discharges, effluent levels, treatment systems, and dewatering, among others. Additionally, the Construction General Permit requires 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 activities for the specific replacements project would disturb less than one acre, construction grading activities would be subject to the requirements of the Los Angeles Department of Building and Safety 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. Additionally, dewatering would be confined to the limits of the trunk line and distribution main line alignments and would be temporary. All dewatering, if necessary, would cease once construction is complete. Because any dewatering would be localized, temporary, and limited in volume, it is not anticipated that any temporary lowering of localized groundwater levels would significantly impact the source aquifer such that subsidence would occur.

Collapsible soils consist of unconsolidated, low-density materials that may collapse and compact under the addition of excessive water or loading. Soil collapse occurs when the land surface is saturated at depths greater than those reached by typical rain events. Certain portions of the trunk line system under the proposed program may be underlain by young Holocene alluvial materials (gravel, sand, and clay of valley areas); artificial fill material associated with man-made disturbances such as grading and development may also be located within specific project areas. During construction, trenches would be backfilled with cement slurry, and all program components would be designed and constructed in accordance with all applicable federal, State, and local codes related to seismic criteria. Therefore, impacts related to unstable geologic units would be less than significant, and this issue will not be further analyzed in the PEIR.

For the same reasons described above, impacts to lateral spreading, subsidence, collapsible soils associated with the six priority projects would also be less than significant.

d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. Expansive soils are clay-based soils that tend to expand (increase in volume) as they absorb water and shrink (lessen in volume) as water is drawn away. If soils consist of expansive clays, foundation movement and/or damage can occur. Projects implemented under the proposed program may be located in areas underlain by expansive soils within the City of Los Angeles and portions of Los Angeles County within the program area. As part of the route study conducted for each trunk line replacement project, LADWP would conduct a preliminary geotechnical and geologic assessment to identify adverse soil conditions, including expansive soils, that could affect route selection and to minimize trunk line risk exposure. Site-specific geotechnical assessments would provide design recommendations to address expansive soil conditions as needed. In addition, all proposed program components would be designed and constructed in compliance with the latest version of the applicable building code, such as the City of Los Angeles Building Code or Los Angeles County Building Code, and other applicable federal, State, and local codes. Because the proposed program does not include the development of habitable structures and would be designed to address expansive soil conditions, impacts would be less than significant, and this issue will not be further analyzed in the PEIR. For the same

reasons described above, impacts to expansive soil associated with the six priority projects would also be less than significant.

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

No Impact. No septic tanks or alternative wastewater disposal systems are proposed as part of the program, including the six priority projects, which would be located in previously disturbed areas served by existing water infrastructure. Therefore, no impact related to the use of such systems would occur, and this issue will not be further analyzed in the PEIR.

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

Potentially Significant Impact. The proposed program, including the six priority projects, would involve excavation and ground-disturbing activities, such as trenching, excavation, pipe installation, and trenchless construction methods. Excavation during construction activities may encounter previously undisturbed geologic materials in some locations. Therefore, a paleontological resources assessment will be prepared to evaluate the potential for impacts to paleontological resources. A detailed analysis of this issue will be included in the PEIR.

3.8 Greenhouse Gas Emissions

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

Discussion

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

Potentially Significant Impact. Greenhouse gas (GHG) emissions refer to a group of emissions that are generally believed to affect global climate conditions. GHGs, such as carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O), keep the average surface temperature of the Earth close to 60 degrees Fahrenheit. In addition to CO_2, CH_4, and N_2O, GHGs include hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride (SF_6), black carbon (the most strongly light-absorbing component of particulate matter emitted from burning fuels such as coal, diesel, and biomass), and water vapor. CO_2 is the most abundant pollutant that contributes to climate change through fossil fuel combustion. The other GHGs are less abundant but have higher global warming potency than CO_2. To account for this higher potential, emissions of other GHGs are frequently expressed in the equivalent of CO_2, denoted as CO_2e. CO_2e is a measurement used to account for the fact that different GHGs have different potential to retain infrared radiation in the atmosphere and contribute to the greenhouse effect.

Temporary GHG emissions would be generated from use of off-road equipment and haul truck and worker vehicle trips during construction activities. Operational activities would be limited to scheduled maintenance and emergency repair. Maintenance activities would be minimal and would be similar to those that occur under existing conditions. A GHG emissions technical analysis will be prepared for the proposed program, including the six priority projects, to assess the GHG emissions associated with construction and operation of activities under the proposed program. A detailed analysis of this issue will be included 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?

Potentially Significant Impact. As discussed in Section 3.8(a) above, implementation of the proposed program would generate GHG emissions during construction and minimal GHG emissions during operations. A GHG emissions technical analysis will be prepared for the proposed program, including the six priority projects, to evaluate the program's consistency with applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions, such as the California Air Resources Board Scoping Plan and the City of Los Angeles Green New Deal. A detailed analysis of this issue will be included 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
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☒	☐	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 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?

Less Than Significant Impact. Construction of replacement 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 hazardous materials. Construction activities would include the use of hazardous materials typical of construction (e.g., fuel and lubricants for construction equipment). These materials are not considered acutely hazardous. All handling, storage, and disposal of these materials are regulated by the California Department of Toxic Substances Control, the U.S. Environmental Protection Agency, and the Los Angeles Fire Department (LAFD). Construction activities under the proposed program would also involve the excavation and transport of paving materials (e.g., asphalt, concrete, roadbed fill materials) that could potentially be contaminated by vehicle-related pollution (e.g., oil, gasoline, diesel, and other automotive chemicals). The transport, use, and disposal of construction-related hazardous materials would comply with applicable health and safety laws and regulations.

Operation of replacement projects under the proposed program would not require the routine transport, use, or disposal of hazardous materials, as the replaced pipeline segments would continue to convey potable water as usual. With adherence to applicable regulations, impacts related to the routine transport, use, or disposal of hazardous materials would be less than significant. This issue will not be further analyzed in the PEIR. For the same reasons described above, impacts to the routine transport, use, or disposal of hazardous materials associated with the six priority projects would also be less than significant.

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

Less Than Significant Impact. Construction activities associated with implementation of the proposed program would involve limited transport, storage, and use of hazardous materials, such as fuel for construction equipment. These types of materials, however, are not acutely hazardous, and all storage, handling, and disposal of these materials would comply with existing regulations. Operation of the proposed program would not involve the use of hazardous materials. Compliance with local, State, and federal regulations would ensure that impacts related to reasonably foreseeable upset or accident conditions involving the release of hazardous materials would be less than significant. This issue will not be further analyzed in the PEIR. For the same reasons described above, impacts to reasonably foreseeable upset or accident conditions involving the release of hazardous materials associated with the six priority projects would also be less than significant.

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

Less Than Significant Impact. Projects implemented under the proposed program may be located within one-quarter mile of existing schools across the City and the County of Los Angeles within the program area. However, as discussed in Sections 3.9(a) and 3.9(b) above, project construction under the proposed program would involve the limited use of hazardous materials, such as fuel and lubricants, which are not considered acutely hazardous, and would not emit hazardous emissions. These materials would be handled in accordance with applicable federal, State, and local regulations regarding storage, use, and disposal. Compliance with existing regulations would ensure a less than significant impact related to the handling of these materials within one-quarter mile of an existing school during construction activities. During operation, projects under the proposed program would not involve hazardous emissions or the handling of hazardous materials. This issue will not be further analyzed in the PEIR. For the same reasons described above, impacts to the handling of hazardous materials within one-quarter mile of a school associated with the six priority projects would also be less than significant.

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?

Potentially Significant Impact. Government Code Section 65962.5 requires the California Environmental Protection Agency to compile and maintain a list of hazardous materials release sites (commonly known as the CORTESE List), including Leaking Underground Storage Tank (LUST) sites, hazardous waste facilities, and sites subject to cleanup under the oversight of the

DTSC and the SWRCB.[16] Projects implemented under the proposed program would be located primarily within existing road ROW and could be located on or adjacent to sites included on the CORTESE List or other regulatory databases. Site-specific Phase I Environmental Site Assessments would be prepared for the six individual projects to identify listed hazardous materials sites, including LUST and other cleanup sites, along the proposed alignments. A detailed analysis of this issue will be included in the PEIR.

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?

Potentially Significant Impact. Projects implemented under the proposed program may be located within an airport land use compatibility plan or within two miles of a public airport or public use airport, including airports within and adjacent to the City of Los Angeles. With respect to safety hazards, specific project areas would be located primarily within public road ROW or utility easements, and program components would primarily be located underground once completed. As such, the proposed program, including the six priority projects, would not result in a safety hazard for people residing or working in the project area, or pose a hazard to aircraft operations. With respect to excessive noise, construction activities under the proposed program could generate temporary noise in the vicinity of an airport. As discussed in Section 3.13, Noise, a noise and vibration technical report will be prepared for the proposed program, including the six priority projects, and airport-related and construction noise will be evaluated in the PEIR. A detailed analysis of this issue will be included in the PEIR.

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

Less Than Significant Impact. The City of Los Angeles Emergency Management Department coordinates emergency evacuations with the Los Angeles Police Department (LAPD) and LAFD, as outlined in the City's Emergency Operations Plan.[17] The proposed program involves replacement of aging pipeline segments throughout the trunk line system and installation of associated appurtenances, primarily within public road ROW or utility easements. The proposed program would require the establishment of temporary work areas that would occupy traffic lanes, which could result in temporary partial or full lane closures in the segment under construction. The temporary lane closures could affect designated disaster routes. However, a traffic control plan, as required by the Los Angeles Department of Transportation (LADOT), would be implemented and would include measures such as signage, flag persons, and lane detours as necessary to minimize disruptions to traffic. In addition, partial or full lane closures would be necessary for installing the new pipeline, but it is anticipated that a minimum of one travel lane in each direction adjacent to the work zone and local access would typically be maintained throughout construction. Additionally, some projects under the program may occur outside of City boundaries. LADWP would coordinate with all applicable agencies regarding construction schedules and worksite traffic control and detour plans, including, but not limited to, LADOT, LACPW, Caltrans, the City of Los Angeles Bureau of Engineering, LAFD, LAPD, and cities in which project alignments are located. These disruptions would be temporary, and the roadway would be restored to pre-construction conditions after construction is complete. As such,

[16] California Environmental Protection Agency, CORTESE List: Section 65962.5(a), available at: https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5a/, accessed September 9, 2026.

[17] City of Los Angeles, Emergency Management Department, *City of Los Angeles Base Emergency Operations Plan*, 2023.

construction and operation of projects implementation under the proposed program would not alter the adjacent street system such that the program would impair implementation of an adopted emergency response plan or emergency evacuation plan. Therefore, no long-term impacts would result from the operation of the proposed program, and impacts would be less than significant. This issue will not be further analyzed in the PEIR. For the same reasons described above, impacts to interference with an adopted emergency response plan or emergency evacuation plan associated with the six priority projects would also be less than significant.

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

Less Than Significant Impact. Projects implemented under the proposed program may be located within a designated Very High Fire Hazard Severity Zone (VHFHSZ) in a State Responsibility Area (SRA), as defined by the California Department of Forestry and Fire Protection.[18] However, construction activities would be located primarily within the existing road ROW or utility easements within generally urbanized and developed areas, which would reduce risks of wildland fire. In addition, the proposed program would not include the construction of habitable buildings or other structures intended for human occupancy. Following construction, the replacement trunk lines would be located underground and would not create new uses that would expose people to wildfire hazards. Therefore, the proposed program would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires, and a less than significant impact would occur. This issue will not be further analyzed in the PEIR. For the same reasons described above, impacts to exposing people or structures to a significant risk of loss, injury, or death involving wildland fires associated with the six priority projects would also be less than significant.

[18] California Department of Forestry and Fire Protection (CalFire), Fire Hazard Severity Zones, available at: https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones, accessed March 23, 2026.

3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or 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?

Less Than Significant Impact. Water quality standards and waste discharge requirements including the federal Water Pollution Control Act Amendment of 1972 (also referred to as the Clean Water Act) and the California Porter-Cologne Water Quality Control Act (Section 13000 et seq. of the California Water Code) are intended to protect the quality of waters within the State of California and require that comprehensive water quality control plans be developed.

Projects implemented under the proposed program, including the six priority projects, would require earthwork, such as trenching and grading, for the replacement of pipeline segments throughout the trunk line system and installation of associated appurtenances which may temporarily increase the potential for soil erosion during construction. In addition, construction activities have the potential to degrade water quality through the exposure of surface runoff to

exposed soils, dust, and other debris, as well as from runoff from construction equipment. Construction activities would be expected to result in the disturbance of more than one acre of soil and, as such, would be required to obtain coverage under the NPDES Construction General Permit, issued by the SWRCB. In accordance with the Construction General Permit, project-specific SWPPPs would be developed and implemented to control pollutants in stormwater discharges during construction activities. The SWPPP would identify structural and nonstructural BMPs, such as erosion and sediment control, general housekeeping practices, and inspection for leaks and spills from construction vehicles and equipment that would be implemented during individual project construction under the proposed program. Operation of the proposed program would be limited to routine maintenance of the pipeline, similar to existing conditions. Therefore, with adherence to existing requirements, including the project-specific SWPPPs during construction, impacts would be less than significant. 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?

Less Than Significant Impact. Construction activities under the proposed program would require water for dust control, which would be supplied through existing municipal sources and would represent a relatively small volume relative to existing supplies. As described in Chapter 1, Project Description, excavation would be required for both the trenching and tunneling methods of pipeline installation. In some portions of the City, groundwater may occur at depths as shallow as approximately 10 feet below ground surface. Because excavation could extend to or below the depth of shallow groundwater, groundwater may be encountered during construction in some locations. Where high groundwater is encountered, either a watertight shoring system would be implemented, or groundwater would be removed during trench excavation by pumping from dewatering wells drilled along the alignment; the extracted groundwater would be treated for contaminants, if present, before discharge to the storm drain or sewer system under applicable permit requirements. Any dewatering would be localized to the trench or pit areas, would involve relatively small volumes, and would cease upon the completion of construction. Due to the temporary, localized, and limited volume of potential dewatering, it is not anticipated that lowering of localized groundwater levels would significantly impact the source aquifer such that program implementation would impede recharge or result in ground subsidence. The proposed program would replace aging underground pipeline segments throughout the trunk line system and would install associated appurtenances as required to support operation and maintenance of the pipelines. These activities would not increase potable water demand or alter groundwater extraction or recharge conditions. In addition, implementation of the proposed program would not conflict with the sustainable management of any applicable groundwater basin, as it would not involve extraction of groundwater for supply, would not increase impervious surfaces that could reduce recharge, and would not otherwise interfere with a groundwater sustainability agency's management of the basin under the State’s Sustainable Groundwater Management Act. As such, implementation of the proposed program would not substantially deplete groundwater supplies or interfere with groundwater recharge, and less than significant impacts would occur. This issue will not be further analyzed in the PEIR. For the same reasons described above, impacts to the depletion of groundwater supplies or interference with groundwater recharge associated with the six priority projects would also be less than significant.

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

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

Less Than Significant Impact. As discussed in Section 3.7(b), construction activities under the proposed program, including the six priority projects, would include ground-disturbing activities, such as trenching, excavation, pipe installation, and trenchless construction methods, which could result in the potential for erosion to occur at individual project sites. Projects implemented under the proposed program would be required to implement standard temporary construction controls for erosion and sediment control. Additionally, as construction under the proposed program would disturb more than one acre of land, a SWPPP with erosion control measures in compliance with Construction General Permit requirements will be required for individual projects.

Pipeline segment replacements throughout the trunk line system and the installation of associated appurtenances would be located primarily within the existing paved road ROW or utility easements, and as such, are not expected to alter the existing grade or drainage pattern of the area. Construction would primarily occur within the existing road ROW, and excavated soil would be immediately hauled off site to disposal areas. Pavement removed from individual project sites would be recycled and reused as backfill material or pavement base material or transported to an appropriate facility for recycling or disposal. As excavation occurs, trenches would be properly shored using a beam-and-plate system to retain the trench walls. Once construction is completed, program components would be located primarily underground, and no impacts to drainage patterns or an existing stream would be anticipated to occur during operation of projects under the proposed program. Therefore, the impact would be less than significant, and 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?

Less Than Significant Impact. Pipeline segment replacements throughout the trunk line system and the installation of associated appurtenances would be located primarily within the existing paved road ROW or utility easements, and as such, are not expected to alter the existing grade or drainage pattern of the area by changing the imperviousness of the alignment. The open-trench and tunneling construction methods are not expected to result in a substantial increase in the rate of surface runoff or result in on- or off-site flooding. Once construction is completed, program components would be located primarily underground, and no impacts to surface runoff resulting in flooding are anticipated to occur during operation of projects under the proposed program. Therefore, the impact would be less than significant, and this issue will not be further analyzed in the PEIR. For the same reasons described above, impacts to on- or off-site flooding associated with the six priority projects would also be less than significant.

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?

Less Than Significant Impact. Construction of the proposed program, including the six priority projects, would use water to control fugitive dust, which would result in minimal quantities of discharge water. The discharge water would drain into existing storm drains. Additionally, hydrostatic testing would be conducted periodically throughout construction and would require

discharge of water during the test event. Additional water may need to be discharged in order to evacuate the air pockets in the pipe. Hydrostatic test water would be discharged to the storm drain system in accordance with the Los Angeles Regional Water Quality Control Board dewatering permit requirements or to the sewer system per Sewer Capacity Availability Review Permit requirements. Once hydrostatic testing is completed, the new pipelines would be disinfected. Specific BMPs would be identified in the SWPPP developed for the individual project pursuant to NPDES permit requirements to control runoff from the specific project site during construction. Once construction is complete, operation of projects under the proposed program would not result in any increases in runoff since the pipeline would be located underground. Therefore, the impact would be less than significant, and this issue will not be further analyzed in the PEIR

iv. Impede or redirect flood flows?

Less Than Significant Impact. Projects implemented under the proposed program, including the six priority projects, may be located within a flood zone. However, due to the nature of the program, and due to the replacement pipelines being located underground, the proposed program would not impede or redirect flood flows. Therefore, impacts would be less than significant, and this issue will not be further analyzed in the EIR.

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

Less Than Significant Impact. As discussed in Section 3.10(c)(iv), projects implemented under the proposed program, including the six priority projects, may be located within a flood zone. Tsunamis are large ocean waves that are generated by major earthquakes, undersea landslides, volcanic eruptions, or other similar seismic activity. Factors influencing the size and speed of a tsunami include the source and magnitude of the triggering event, as well as off-shore and on-shore topography. Seiches are large waves generated in enclosed bodies of water in response to ground shaking. Projects implemented under the proposed program may be located in proximity to a tsunami zone or a confined water body that could pose a risk from a seiche. However, project components under the proposed program would occur primarily underground within the existing paved road ROW or utility easements and, therefore, would not increase risks associated with the release of pollutants due to inundation. As such, impacts would be less than significant, and this issue will not be further analyzed in the PEIR.

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

Less Than Significant Impact. As appropriate, LADWP would develop project-specific SWPPPs pursuant to the Construction General Permit requirements that would identify BMPs to control runoff from specific project sites under the proposed program during construction. As discussed in Section 3.10(b), excavation depths could extend to or below shallow groundwater (which may occur as shallow as approximately 10 feet), and temporary dewatering may be required where groundwater is encountered. As discussed in Section 3.7, a site-specific geotechnical assessment would be conducted for each individual project to evaluate historically high groundwater levels and determine whether dewatering is required. Any short-term, localized dewatering would not substantially interfere with the implementation of an applicable sustainable groundwater management plan. Furthermore, as discussed in Section 3.10(b), the proposed program would not extract groundwater for supply or reduce basin recharge and therefore would not conflict with the sustainable management of any applicable groundwater basin under the State's Sustainable Groundwater Management Act. Operation of projects under the proposed program is not

anticipated to increase runoff or decrease water quality compared to existing conditions. Therefore, implementation of the proposed program, including the six priority projects, would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. The impact would be less than significant, and this issue will not be further analyzed in the PEIR.

3.11 Land Use and Planning

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

Discussion

a) Would the project physically divide an established community?

Less Than Significant Impact. Implementation of the proposed program, including the six priority projects, would not physically divide an established community. Program components would be located primarily underground within existing road ROW or utility easements. Partial or full lane closures would be necessary for replacing existing pipeline segments throughout the trunk line system and for installing associated appurtenances; however, it is anticipated that a minimum of one travel lane in each direction adjacent to the work zone and local access would typically be maintained throughout construction. Traffic control plans would be prepared in coordination with LADOT and other applicable local or State transportation agencies to delineate traffic lanes around work areas and to modify any turn lane pockets affected by the proposed program at major intersections. As specific project sites may be surrounded by residential and commercial uses, residences and businesses near specific project areas 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 the proposed program, and no separation of uses or disruption of access between land use types would occur. Following completion of individual project construction, the roadways would be returned to their existing condition. As such, implementation of the proposed program would not physically divide an established community, and impacts would be less than significant. 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?

No Impact. Program components would be located primarily within existing road ROW or utility easements. Thus, implementation of the proposed program, including the six priority projects, would not conflict with existing land use or zoning designations, as it would not affect the use of adjacent land per the applicable land use regulations. Therefore, no impact to applicable land use plans, policies, or regulations would occur, and this issue will not be further analyzed in the EIR.

3.12 Mineral Resources

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

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?

Less Than Significant Impact. California's Surface Mining and Reclamation Act of 1975 requires the State Geologist to classify land into mineral resource zones (MRZ) based on the known or inferred mineral resource potential of that land. The California Department of Conservation's Mineral Resources Program provides data about California's varied non-fuel mineral resources (such as metals and industrial minerals), naturally occurring mineral hazards (such as asbestos, radon, and mercury), and information about active and historic mining activities throughout the state.[19] Classification is completed by the State Geologist, wherein lands classified MRZ-1 are areas where geologic information indicates no significant mineral deposits are present, lands classified MRZ-2 are areas that contain identified mineral resources, lands classified MRZ-3 are areas of undetermined mineral resource significance, and lands classified MRZ-4 are areas of unknown mineral resource potential.[20]

Implementation of the proposed program would involve replacement of aging underground pipeline segments throughout the trunk line system and the installation of associated appurtenances as required to support operation and maintenance of the pipelines. Projects implemented under the proposed program may be located in or cross areas mapped as MRZ-2. However, construction activities would occur primarily within existing road ROW or utility easements that have been previously disturbed by past grading, roadway construction, and installation of underground infrastructure. These environments do not provide access to, or extraction of, regionally significant mineral resources. The disturbed nature of these ROWs indicates that any mineral resources that may have once been present have either already been removed, rendered inaccessible, or are not feasible for future extraction. As such, implementation of the proposed program would not alter land use designations, and would not restrict access to any known mineral recovery sites identified by state or local plans. Implementation of the proposed program would not result in the loss of availability of a regionally important mineral resource. Impacts would be less than significant, and this issue will not be further analyzed in the PEIR. For the same reasons described above, impacts to the loss of availability of regionally important mineral resources associated with the six priority projects would also be less than significant.

[19] California Department of Conservation, 2019, The California Mineral Resources Program, available at: https://www.conservation.ca.gov/cgs/minerals/program, accessed March 23, 2026.

[20] California Department of Conservation, n.d., Guidelines for Classification and Designation of Mineral Lands.

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?

Less Than Significant Impact. Projects implemented under the proposed program may be located in or cross areas mapped as locally important mineral resource recovery sites in the City of Los Angeles General Plan or other land use plans. However, construction activities would occur primarily within existing road ROW or utility easements that have been previously disturbed by past grading, roadway construction, and installation of underground infrastructure. These environments do not provide access to, or extraction of, locally significant mineral resources. The disturbed nature of these ROWs indicates that any mineral resources that may have once been present have either already been removed, rendered inaccessible, or are not feasible for future extraction. Additionally, implementation of projects under the proposed program would not include any mineral extraction activities. Implementation of the proposed program would not result in the loss of availability of a locally important mineral resource. Impacts would be less than significant, and this issue will not be further analyzed in the PEIR. For the same reasons described above, impacts to the loss of availability of locally important mineral resources associated with the six priority projects would also be less than significant.

3.13 Noise

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

Potentially Significant Impact. Construction activities under the proposed program have the potential to generate noise levels that exceed applicable standards in individual project areas. The proposed program would replace aging pipeline segments throughout the trunk line system and would install associated appurtenances required for pipeline maintenance. Projects implemented under the proposed program may occur adjacent to residences, schools, parks, hospitals, and other noise-sensitive land uses. As such, construction activities have the potential to expose nearby sensitive receptors to elevated noise levels. A noise and vibration technical report will be prepared for the proposed program, including the six priority projects, to assess the potential for short-term and long-term increases in noise levels and any associated impacts. A detailed analysis of this issue will be included in the PEIR.

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

Potentially Significant Impact. Construction activities under the proposed program may generate ground-borne vibration from the use of heavy equipment, particularly in areas where sensitive receptors are located near construction activities. A noise and vibration technical report will be prepared for the proposed program, including the six priority projects, to evaluate the potential for groundborne noise and vibration, as well as any associated impacts. A detailed analysis of this issue will be included 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?

Potentially Significant Impact. Construction activities under the proposed program have the potential to generate noise levels that exceed applicable standards in the vicinity of an airport. A noise and vibration technical report will be prepared for the proposed program, including the six priority projects, to assess the potential for short-term and long-term increases in noise levels and any associated impacts. A detailed analysis of this issue will be included in the PEIR.

3.14 Population and Housing

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

Discussion

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

No Impact. The proposed program, including the six priority projects, does not include construction or operation of any residential or commercial land uses with the potential to generate new residents or permanent workers in the project area. Given the temporary nature of construction industry jobs, the relatively large regional construction industry, and the relatively nominal total number of construction workers needed during any construction phase, it is likely that the labor force from within the region would be sufficient to complete project construction without a substantial influx of new workers and their families, and any such relocation within the region would be minimal. Construction employment generated by implementation of the proposed program would not impact population in the heavily populated Los Angeles region. Once in operation, existing LADWP employees would perform scheduled maintenance and emergency repair. Therefore, implementation of the proposed program would not directly induce substantial population growth, and no impact would occur.

The proposed program would replace aging underground pipeline segments throughout the trunk line system that would serve existing customers. Since implementation of the proposed program would provide no additional water supply to the City, it would not indirectly induce population growth. Therefore, no impact to population growth during operation of projects under the proposed program would occur, and these issues 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?

No Impact. Construction under the proposed program, including the six priority projects, would take place primarily within existing road ROW or utility easements. No housing is located within these work areas, and implementation of the proposed program would not require acquisition, removal, or alteration of any residential structures. Because construction activities would be primarily confined to existing road ROWs and would not affect the availability, location, or number of homes, implementation of the proposed program would not displace residents or necessitate the construction of replacement housing elsewhere. Therefore, no impact would occur, and this issue 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?	☐	☐	☐	☒
iii) 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?

No Impact. Fire protection services for the proposed program, including the six priority projects, would be provided by LAFD and local fire departments in areas where program components would be implemented outside of the City boundaries. There are 114 LAFD stations across the City of Los Angeles.[21] An increased demand for fire protection is generally associated with a new land use development or an increase in population. The proposed program would replace aging segments of underground pipeline throughout the trunk line system and would install associated appurtenances as required for pipeline maintenance. Additionally, as discussed in Section 3.14, Population and Housing, implementation of the proposed program would not directly or indirectly induce population growth, and, thus, would not result in an increased demand for fire protection services. Therefore, it is not anticipated that any new or physically altered fire protection facilities would be required to maintain acceptable service ratios, response times, or other performance objectives due to program implementation. No impact would occur, and this issue will not be further analyzed in the PEIR.

ii. Police protection?

No Impact. Police protection services for the proposed program, including the six priority projects, would be provided by LAPD and local police departments in areas where program components would be implemented outside of the City boundaries. There are numerous LAPD stations across

[21] Los Angeles Fire Department, Find Your Station, available at: https://lafd.org/fire-stations/station-results, accessed March 26, 2026.

the City of Los Angeles. An increased demand for police protection is generally associated with a new land use development or an increase in population. As discussed above in Section 3.14(a), implementation of the proposed program would not directly or indirectly induce population growth, and, thus, would not result in an increased demand for police protection services. Therefore, no new or physically altered police protection facilities would be required to maintain acceptable service ratios, response times, or other performance objectives. No impact would occur, and this issue will not be further analyzed in the PEIR.

iii. Schools?

No Impact. The City of Los Angeles is primarily served by the Los Angeles Unified School District, while areas outside of the City boundaries within the program area would be served by local school districts. 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, implementation of the proposed program, including the six priority projects, would not directly or indirectly induce population growth. Therefore, implementation of the proposed program would not require the construction of additional schools or the expansion of existing schools. No impact would occur, and this issue will not be further analyzed in the PEIR.

iv. Parks?

No Impact. An increased demand for parks is generally associated with a new land use development or an increase in population. As discussed above, implementation of the proposed program, including the six priority projects, would not directly or indirectly induce population growth. Thus, the demand for parks would not increase with the implementation of the proposed program. No impact would occur, and this issue will not be further analyzed in the PEIR.

v. Other public facilities?

No Impact. An increased demand for public facilities, such as libraries, is generally associated with a new land use development or an increase in population. As discussed above, implementation of the proposed program, including the six priority projects, would not directly or indirectly induce population growth. Therefore, implementation of the proposed program would not result in the need for new or expanded public facilities. No impact would occur, and 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?

No Impact. The proposed program involves replacing aging segments of underground pipeline throughout the existing trunk line system and installing associated appurtenances as required for pipeline maintenance. No additional water supply is proposed as part of the proposed program. Construction workers are anticipated to be largely drawn from the existing workforce in the region, and no additional workers would be required for the operation of projects under the proposed program. Neither construction nor operation of projects under the proposed program would generate new permanent residents that would increase the use of existing parks and recreational facilities. Therefore, substantial physical deterioration of these facilities would not occur or be accelerated with implementation of the proposed program. No impact would occur, and this issue will not be further analyzed in the PEIR. For the same reasons described above, no impacts to substantial physical deterioration of recreational facilities associated with the six priority projects would occur.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. The proposed program does not include the development of any recreational facilities. Further, since the proposed project would provide no additional water supply to the City, it would not induce growth that could require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. No impact would occur, and this issue will not be further analyzed in the PEIR. For the same reasons described above, no impacts to the construction or expansion of recreational facilities associated with the six priority projects would also occur.

3.17 Transportation

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

Less Than Significant Impact. Projects implemented under the proposed program, including the six priority projects, may be located adjacent to transit facilities operated by the Los Angeles County Metropolitan Transportation Authority and other local transit operators. Projects may also occur along roadways that are part of the City of Los Angeles transportation network as well as local and State transportation departments for portions of the program area outside of the City boundaries. These roadways may include transportation facilities, bicycle facilities, pedestrian facilities, transit stops, and traffic control infrastructure. Bicycle lanes and pedestrian facilities in individual project areas under the proposed program would include sidewalks and crosswalks on local roadways along existing trunk line alignments.

As discussed previously, construction activities would take place primarily within the existing road ROW or utility easements. Construction activity within the public road ROW may require temporary partial or full lane closures, which would disrupt traffic in the area of the construction zones, including automobile, bus, bicycle, and pedestrian (e.g., crosswalks, sidewalks) traffic. However, a minimum of one travel lane in each direction and local access would generally be maintained throughout construction. A traffic control plan, as required by LADOT for projects within the City, would include measures such as signage, flag persons, detour plans, and temporary relocation of bus stops if necessary to reduce disruptions. LADWP would also coordinate with applicable agencies regarding construction schedules and worksite traffic control and detour plans. 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. Therefore, the impact during construction would be less than significant.

Following the completion of construction activities, all road ROWs would be returned to pre-construction conditions, and operation of projects under the proposed program would require only periodic maintenance activities, which would not represent a conflict with a program plan, ordinance, or policy addressing the circulation system. 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)?

No Impact. CEQA Guidelines Section 15064.3 establishes vehicle miles traveled (VMT) as the most appropriate measure of transportation impacts. VMT refers to the amount and distance of automobile travel attributable to a project. The LADOT Transportation Assessment Guidelines (LADOT Guidelines) establish instructions and standards for the preparation of a transportation assessment in the City of Los Angeles.[22] 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 a development project. According to the LADOT Guidelines, public services (e.g., police, fire stations, public utilities, and local-serving parks and recreation facilities) do not generally generate substantial VMT and are often built in response to development from other land uses. Therefore, the LADOT Guidelines conclude that such land uses can be presumed to have less than significant impacts on VMT.

Daily vehicular trips for construction of projects under the proposed program, including the six priority projects, are anticipated to include a maximum of 10 round trips per day for transportation of construction equipment to and from the work areas when necessary; approximately 25 round trips per day for transportation of construction workers to and from the work areas (2 crews); and 20 round trips per day for haul. Operation of projects under the proposed program are not anticipated to generate new vehicle trips since they would generally consist of replacing existing water conveyance infrastructure and would serve existing customers. Due to the temporary and relatively low-level nature of traffic generated by an individual project's construction, VMT assessments are not relevant for each project, especially since they would not result in new post-construction operational trips. As such, neither construction nor operation of the projects under the proposed program would conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). No impact would occur, and this issue will not be further analyzed in the PEIR.

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)?

Less Than Significant Impact. The proposed program, including the six priority projects, would not include any new or altered roadways. However, during construction of individual project under the program, traffic lanes may temporarily be closed on streets adjacent to individual project areas. Potential conflicts associated with lane closures would be addressed in the traffic control plan required by LADOT, which would include such measures as signage, flag persons, and detour plans. With the implementation of the required traffic control plan, hazards associated with lane closures during program construction would be less than significant. The proposed program would also not introduce any incompatible land uses or roadway uses, as it involves the replacement of existing underground water conveyance infrastructure. During operation of projects under the proposed program, all road ROWs would be returned to pre-construction configuration, and no conflicts would occur. The impact would be less than significant, and this issue will not be further analyzed in the PEIR.

[22] City of Los Angeles Department of Transportation, Transportation Assessment Guidelines, August 2022, available at: https://ladot.lacity.org/documents/transportation-assessment, accessed March 23, 2026.

d) Would the project result in inadequate emergency access?

Less Than Significant Impact. Projects implemented under the proposed program, including the six priority projects, may require temporary lane closures during construction activities. As such, construction could potentially hinder emergency access along the trunk line alignments. However, partial or full lane closures would be necessary during construction, and it is anticipated that a minimum of one travel lane in each direction adjacent to the work zone would typically be maintained throughout construction. As discussed in Section 1.6.3, LADWP would coordinate with emergency responders, including LAFD and LAPD, regarding construction schedules and traffic control plans to coordinate emergency response routing during construction work. Coordination with emergency response agencies would ensure a less than significant impact to emergency access during construction activities.

During operation of projects under the proposed program, which include the six priority projects, roadways would be returned to pre-construction configuration, and emergency access would not be restricted. No impact would occur and 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)?

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 proposed program would involve ground-disturbing activities, such as trenching, excavation, pipe installation, and trenchless construction methods. A cultural resources technical report will be prepared for the proposed program, including the six priority projects, to assess potential impacts to tribal cultural resources. A detailed analysis of this issue will be included 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?

Potentially Significant Impact. Pursuant to Assembly Bill (AB) 52, California Native American tribes known to have interest in the area will be notified to determine program impacts and mitigation measures. A cultural resources technical report will be prepared for the proposed program, including the six priority projects, to assess potential impacts to tribal cultural resources and will outline the AB 52 consultation efforts conducted for the proposed program. A detailed analysis of this issue will be included 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
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

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?

Less Than Significant Impact. It is not anticipated that the proposed program, including the six priority projects, would require natural gas or telecommunication facilities for construction or operation; no impacts would occur in this regard. This issue will not be further analyzed in the PEIR.

The proposed program would involve the replacement of aging underground pipeline segments throughout the trunk line system and installation of associated appurtenances that would connect to existing water lines. Therefore, the proposed program components would not be considered new or expanded water facilities. During construction, water would be required for activities such as dust control and hydrostatic testing. However, these activities are short-term, temporary, and would not consume quantities of water requiring the construction of new or expanded water supply facilities. During operation, projects under the proposed program would continue to convey water through the existing distribution system and would not increase water demand or require the construction or expansion of water supply facilities. Therefore, impacts would be less than significant. This issue will not be further analyzed in the PEIR.

Construction activities would require temporary use of existing electrical services for construction equipment, testing, and related activities; however, the proposed program would not require the construction or expansion of electric power facilities, and operation of the replacement trunk lines would not result in increased long-term electricity demand. Therefore, impacts related to electric power facilities would be less than significant. This issue will not be further analyzed in the PEIR.

Sanitary waste related to the temporary workforce during specific replacements project construction would be handled through the use of portable chemical toilets, the waste from which would be removed by a private contractor and disposed of at an approved off-site location that would comply with the wastewater treatment requirements of the RWQCB. Due to the temporary nature of the construction activities and the relatively low number of construction workers (two crews of approximately eight workers each), the amount of construction-related wastewater that would be generated for individual projects is not expected to have a significant impact related to the capacity of existing regional wastewater conveyance and treatment facilities serving the proposed program area. In addition, no additional workers beyond existing conditions are anticipated for operation of projects under the proposed program. Therefore, implementation of the proposed program would not require the construction or expansion of wastewater treatment facilities, and impacts would be less than significant. This issue will not be further analyzed in the PEIR.

All drainage flows would be routed through existing storm infrastructure serving specific project sites and surrounding areas. As discussed in Section 3.10, Hydrology and Water Quality, construction activities would comply with applicable stormwater regulations and implement project-specific SWPPPs and erosion- and sediment-control BMPs. During operation of projects under the proposed program, storm water flows would be similar to existing conditions because the proposed program consists primarily of replacing existing underground infrastructure within existing paved road ROW and would not substantially alter drainage patterns or add impervious surfaces. Therefore, implementation of the proposed program would not require or result in the construction or expansion of storm water drainage facilities, and no impact would occur. This issue will not be further analyzed in the PEIR.

For the same reasons described above, impacts to new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities associated with the six priority projects would also be less than significant.

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

Less Than Significant Impact. Construction of projects under the proposed program would require a limited quantity of water for dust control, excavation, hydrostatic testing, and other construction-related activities. Existing water resources provided by LADWP would be sufficient to meet those needs. The proposed program would replace segments of aging underground pipeline throughout the trunk line system and would install associated appurtenances as required for pipeline maintenance. These improvements would be implemented for existing water infrastructure with the intent to increase safety and reliability, allow for greater operational flexibility, increase the ability to transmit local water supplies, and decrease dependence on imported water supplies. With implementation of the proposed program water supplies would continue to be delivered from the Los Angeles Aqueduct Filtration Plant and water supplies purchased from the Metropolitan Water District of Southern California, similar to existing conditions. Once completed, the pipeline segment replacements and installed appurtenances would transmit water to the same service areas and customers and would not require new water

supplies or increase the demand for water use. In addition, LADWP's 2025 Urban Water Management Plan, adopted April 2026, concludes that projected water demands within its service area can be met by available water supplies under normal, dry, and multiple dry-year conditions through 2050.[23] Because implementation of the proposed program would not increase water demand and would continue to serve existing customers within LADWP's service area, sufficient water supplies would remain available during normal, dry, and multiple dry years. Therefore, impacts would be less than significant, and this issue will not be further analyzed in the PEIR. For the same reasons described above, impacts to water supplies associated with the six priority projects would also be less than significant.

c) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. As discussed above in Section 3.19(a), the sanitary waste related to the temporary increase in on-site workforce during construction of projects under the proposed program would be handled through the use of portable chemical toilets, the waste from which would be removed by a private contractor and disposed at an approved off-site location that would comply with the wastewater treatment requirements of the RWQCB. Due to the temporary nature of the construction activities and the relatively low number of construction workers, the amount of construction-related wastewater that would be generated is not expected to have a significant impact related to the capacity of existing regional wastewater treatment facilities. In addition, no additional workers are anticipated for operations under the proposed program, including for the six priority projects, that could increase wastewater generation over existing conditions. Therefore, impacts would be less than significant, and 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?

Less Than Significant Impact. Excavation would be required during construction of projects implemented under the proposed program. Construction activities would generate construction waste, including demolished asphalt and soils. The proposed program, which include the six priority projects, would incorporate source reduction techniques and recycling measures, as well as maintain a recycling program to divert waste in accordance with the Citywide Construction and Demolition Waste Recycling Ordinance. The Citywide Construction and Demolition Waste Recycling Ordinance, which requires all mixed construction and demolition waste generated within city limits to be taken to City certified construction and demolition waste processors, would reduce the amount of construction-generated solid waste that would require disposal in landfills.[24]

Inert construction debris, such as excavated soil, asphalt, and concrete, would be delivered to a permitted inert debris or reclamation facility, such as Azusa Land Reclamation, located at 1211 West Gladstone Street, Azusa, California, which accepts inert materials including clean asphalt,

[23] Los Angeles Department of Water and Power, 2025 Urban Water Management Plan, April 2026, available at: https://www.ladwp.com/sites/default/files/2026-06/LADWP%202025%20Urban%20Water%20Management%20Plan_Final.pdf, accessed September 9, 2026.

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

concrete, and soils.[25] Azusa Land Reclamation has a maximum permitted throughput of 8,000 tons per day and an estimated remaining capacity of approximately 44,554,299 cubic yards, with an anticipated cease operation date of January 1, 2045.[26] Non-inert construction debris that cannot be recycled or diverted would be disposed of at a permitted municipal landfill, such as the Sunshine Canyon Landfill, located at 14747 San Fernando Road, Sylmar, California, which has a maximum permitted throughput of 12,100 tons per day. As of May 2024, the remaining capacity was approximately 66,200,000 cubic yards and the expected cease operation date is October 2037.[27] The amount of debris generated during construction is anticipated to be minimal and is not anticipated to significantly impact landfill capacities. Once construction is complete, the operation of replaced trunk line segments and associated appurtenances would not generate solid waste. Additionally, the proposed program would comply with federal, state, and local statutes and regulations regarding solid waste, including the California Integrated Waste Management Act of 1989 (AB 939) and the California Green Building Standards Code (CALGreen). All materials would be handled and disposed of in accordance with existing local, state, and federal regulations. Therefore, impacts would be less than significant, and 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?

No Impact. The proposed program, including the six priority projects, would comply with federal, state, and local statutes and regulations regarding solid waste, such as AB 939, CALGreen, and the City of Los Angeles Citywide Construction and Demolition Waste Recycling Ordinance, as further discussed in Section 3.19(d) above. Construction debris would be recycled or disposed of in accordance with these requirements. During operation, the replacement trunk lines and associated appurtenances would not generate solid waste; therefore, no ongoing solid waste compliance obligations would apply. All materials would be handled and disposed of in accordance with existing local, state, and federal regulations. Therefore, no impact would occur, and this issue will not be further analyzed in the PEIR.

[25] CalRecycle, Solid Waste Information System (SWIS) Facility/Site Profile, Azusa Land Reclamation Co. Landfill (SWIS No. 19-AA-0013), available at: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3532?siteID=1001, accessed September 2, 2026.

[26] Ibid.

[27] CalRecycle, Solid Waste Information System (SWIS) Facility/Site Profile, Sunshine Canyon City/County Landfill (SWIS No.19-AA-2000), available at: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/259?siteID=4702, accessed March 23, 2026.

3.20 Wildfire

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

Discussion

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

Less Than Significant Impact. As discussed in Section 3.9(g), projects implemented under the proposed program, which include the six priority projects, may be located within a designated VHFHSZ in an SRA.[28] The City of Los Angeles Emergency Management Department coordinates evacuations in the case of emergency with LAPD and LAFD, as outlined in the City's Emergency Operations Plan.[29] The County of Los Angeles has designated numerous disaster routes within the County and within the City.[30] To minimize potential traffic and transportation disruptions, construction under the proposed program would be conducted in accordance with the Standard Specifications for Public Works Construction (Greenbook). Traffic control plans would be designed, reviewed, and approved by LADOT, the Los Angeles County Department of Public Works, the City of Los Angeles Bureau of Engineering (LABOE), and other applicable local agencies to allow acceptable levels of service, traffic safety, and emergency access to specific project sites during construction. Equipment necessary for traffic control includes changeable message signs, delineators, arrow boards, and K-rail. LADWP would coordinate with all applicable agencies regarding construction schedules and worksite traffic control and detour plans, including, but not limited to, LADOT, LACPW, Caltrans, LABOE, LAFD, and LAPD. Emergency access to specific project sites and surrounding areas, particularly for emergency

[28] California Department of Forestry and Fire Protection (CalFire). Fire Hazard Severity Zones, available at: https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones, accessed March 23, 2026.

[29] City of Los Angeles, Emergency Management Department, *City of Los Angeles Base Emergency Operations Plan,* 2023.

[30] Los Angeles County Department of Public Works, *Disaster Route Maps*: North and South Los Angeles County, 2012.

response vehicles, would be maintained at all times. Impacts to designated disaster routes would be less than significant.

Operation of projects under the proposed program, which include the six priority projects, would not alter adjacent street systems such that the City's adopted emergency response plan or emergency evacuation plan would be affected. Pipeline segment replacements would be primarily underground and within existing paved road ROW or utility easements, similar to the existing trunk line system. Overall, with implementation of the proposed program, conditions would be similar to existing conditions, with no additional built structures. Therefore, no long-term impact would occur, and 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?

Less Than Significant Impact. The proposed program, which include the six priority projects, may have specific project areas located within a VHFHSZ SRA. However, the road ROW and utility easements where the pipeline replacements would be constructed would be relatively flat and fully paved. Additionally, surrounding uses adjacent to individual project sites would be generally characterized as built up and urban, which limits the risk of wildfire spread. Land uses adjacent to the portions of project sites located in designated VHFHSZ would remain unchanged with implementation of the proposed program, and the program does not propose any habitable structures that would exacerbate wildfire risk. Therefore, the impact would be less than significant, and this issue 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?

Less Than Significant Impact. Pipeline segment replacements and installation of associated appurtenances would be located primarily underground and require general maintenance and repairs as needed during long-term operations. The proposed program, which include the six priority projects, would not include any fuel breaks, emergency water sources, or new power lines that could exacerbate fire risk or result in temporary or ongoing impacts on the environment. As such, impacts would be less than significant, and this issue 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?

Less Than Significant Impact. As discussed in Section 3.7, Geology and Soils, pipeline segment replacements under the proposed program, which include the six priority projects, may be located in landslide zones[31]; however, with adherence to existing construction standards and regulations within these zones, impacts would be less than significant. As discussed in Section 3.10, Hydrology and Water Quality, construction activities would comply with applicable stormwater regulations and implement project-specific SWPPPs and erosion- and sediment-control BMPs to control runoff and prevent downstream sedimentation during construction. Once in operation, program components would be underground along existing road ROW and within utility easements, similar to existing conditions. Therefore, the proposed program, which include the six priority projects, would not expose people or structures to significant risks, including downslope or downstream flooding or landslides resulting from runoff, post-fire slope instability, or drainage changes. Impacts would be less than significant, and this issue will not be further analyzed in the PEIR.

[31] Los Angeles County, Landslide Zones, available at: https://www.arcgis.com/apps/mapviewer/index.html?layers=306103cb524845368d5ae2923fbdccb3, accessed March 23, 2026.

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?

Potentially Significant Impact. As previously discussed, a biological resources technical report will be prepared for the proposed program, which will evaluate potential impacts to special status and/or sensitive species. Additionally, a cultural resources technical report will be prepared for the proposed program, which will evaluate potential impacts to historical and archaeological resources, including tribal cultural resources. A paleontological resources assessment will also be prepared for the proposed program to evaluate potential impacts to paleontological resources. A detailed analysis of these issues will be included 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)?

Potentially Significant Impact. Pursuant to CEQA Guidelines Section 15130, the EIR will include an evaluation of the potential for the proposed program, including the six priority projects, to contribute to cumulative impacts when considered in combination with the effects of other related projects. A detailed analysis of this issue will be included in the PEIR.

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

Potentially Significant Impact. The proposed program, including the six priority projects, could potentially result in environmental effects that may cause adverse effects on human beings with regard to the following environmental areas discussed in this Initial Study: Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Noise, and Tribal Cultural Resources. A detailed analysis of the program's potential direct and indirect effects on human beings will be included in the PEIR.

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