



*THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA*

Garvey Reservoir Rehabilitation Project

*Draft Environmental
Impact Report*



**SCH No. 2024010394
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Executive Summary

This document is a draft Environmental Impact Report (Draft EIR) analyzing the potential environmental effects of The Metropolitan Water District of Southern California's (Metropolitan) proposed Garvey Reservoir Rehabilitation Project (proposed Project). This section summarizes the characteristics of the proposed Project, the environmental impacts and mitigation measures associated with implementation of the proposed Project, and alternatives to the proposed Project considered in this Draft EIR.

Lead Agency Contact Person

Ms. Michelle Morrison, Senior Environmental Specialist
The Metropolitan Water District of Southern California
Environmental Planning Section
P.O. Box 54153
Los Angeles, California 90054-0153

Background

Garvey Reservoir was constructed in 1954 as an open, asphaltic concrete-lined potable water storage facility on top of a hill with earth-filled embankments in the city of Monterey Park. As a component of Metropolitan's Middle Feeder system, the reservoir receives treated water from the F. E. Weymouth Water Treatment Plant and has a maximum storage volume of 1,600 acre-feet. Garvey Reservoir provides critical hydraulic flexibility by stabilizing flowrates within the Middle Feeder and maintaining deliveries to member agency service connections when pipelines are shut down for maintenance. The area served by Garvey Reservoir is commonly referred to as the "Central Pool" and is interconnected by a matrix of pipelines that range from 48 to 79 inches in diameter. The Central Pool covers major portions of Los Angeles and Orange counties and can be supplied by three of Metropolitan's five water treatment plants (F.E. Weymouth, Robert B. Diemer, and Joseph Jensen water treatment plants).

Project Objectives

The objectives of the proposed Project are as follows:

- Upgrade aging infrastructure to ensure safe and reliable drinking water;
- Improve existing laboratory space through building functional and safety improvements;
- Upgrade features of the Garvey Reservoir facility to improve seismic safety and building code/Americans with Disabilities Act (ADA) compliance and to protect public safety and the environment;
- Enhance management of nitrification within the reservoir; and

- Improve existing facilities and install new facilities to enhance operational reliability, minimize the risk of future facility failures, and facilitate efficient operations and maintenance of Garvey Reservoir.

Project Description

The proposed Project consists of rehabilitation of existing components, as well as new construction, as summarized in the following subsections.

Reservoir Cover and Liner

The Garvey Reservoir floating cover is a weight-tensioned type cover that is approximately 1,900,000 square feet in size. The proposed Project includes the following items related to the reservoir cover and liner:

- Redesign of the inlet/outlet (I/O) tower float assembly;
- Replacement of the polypropylene liner and disposal of the existing liner material;
- Inspection of the reservoir drainage system underneath the liner (including the underlying geo-textile cushion, underdrain, circulation piping) and peripheral piping and repair or upgrade of the system and piping, if needed;
- Upgrade of the leak detection and monitoring system;
- Installation of a new floating cover;
- Completion of start-up testing procedures including cover inflation, chlorination, emergency dewatering, and instrument testing.

I/O Tower

Garvey Reservoir is equipped with an I/O tower located at the east end of the reservoir. The proposed Project includes seismic rehabilitation of the I/O tower and access bridge. Equipment within the I/O tower and lighting fixtures along the access bridge would also likely be upgraded and replaced. In addition, whether or not the fixtures along the access bridge are replaced, light-emitting diode (LED) lights would be installed in the fixtures.

Junction Structure

The existing junction structure, which was originally constructed in the 1950s, is located to the east of the Administration Building, directly adjacent to South Orange Avenue. The proposed Project includes replacement of five valves in the junction structure to improve reliability. This component of the proposed Project requires review and approval by the California Department of Water Resources Division of Safety of Dams because a different type of valve would be installed to improve performance. The Division of Safety of Dams regulates these valves because they are required for emergency dewatering of Garvey Reservoir.

Facility Electrical System

The facility electrical system, which includes instrumentation at the Project site, is aged and outdated, which presents maintenance challenges in that some replacement parts are no longer carried by manufacturers. In addition to an aging electrical system, upgrade and/or redesign of the existing electrical system is needed to provide consistent power sources (240-volt to 480-volt), and to replace relays at the switchgear unit, the control panel, and other items. Most of the proposed Project

electrical system work would be located underground between the Administration Building/Water Quality Laboratory and the sodium hypochlorite tank farm.

Standby Generator

The existing standby generator and its appurtenant electrical system, including transfer switches and the switchgear unit, are over 30 years old and have exceeded their useful life. The proposed Project includes replacement of these features along with upgrades to meet current emission and fire codes under the United States Environmental Protection Agency's Emission and Fuel Standards Program. The new generator would either be in the open air under a canopy structure or would be in a new, enclosed building.

Surge Tank Telemetry

An existing 1,000-gallon surge tank is part of the on-site domestic water system located at the top of the reservoir embankment, immediately south of the reservoir. The proposed Project includes improvements to the telemetry equipment connecting the surge tank to the pumps and installation of a direct cable from the pumps in the junction structure to the surge tank pressure switch. The Project also includes upgrades to the pressure switches and automated tank controls.

Administration Building and Water Quality Laboratory

The Administration Building and Water Quality Laboratory are both located within the former chlorination building that was part of the original reservoir construction in the 1950s and later converted to its current functions. The proposed Project includes the following:

- Design of a new interior plan layout for the entire building;
- Relocation of the existing Water Quality Laboratory to the Administration Building and vice versa;
- Relocation of the emergency eye wash station from outside the Administration Building to immediately adjacent to the Water Quality Laboratory;
- Provision of a new ADA-compliant parking stall with accessible path of travel to the building entrance;
- Modifications to the existing restroom for compliance with the 2010 ADA Standard for Accessible Design and 2022 California Building Codes (or most recent iteration in effect at the time);
- Reconstruction of a retaining wall on the south side of the building to prevent ponding and overflow from precipitation;
- Upgrades to the water heater, heating, ventilation, and air conditioning system; and
- Upgrades to enhance safety features.

Pump Station

The proposed Project includes the construction of a new pump station adjacent to South Orange Avenue to allow for better drought operating conditions, water quality, and flow range. The new pump station would be approximately 150 feet south of the junction structure and would house multiple pumps and valves to provide operational flexibility. The pump station would be built of concrete and masonry, approximately 500 square feet in size, and partially recessed about 10 feet into the hillside adjacent to South Orange Avenue. A subsurface valve tie-in to the Middle Feeder is also proposed and would be actuated when the pump station is utilized.

Miscellaneous Site Upgrades

Numerous, smaller site components may be repaired or rehabilitated as part of the proposed Project. These miscellaneous upgrades may include:

- Upgrades to the ammonia feed system;
- Repaving or repairing existing reservoir roads;
- Replacement of perimeter chain link fencing with an eight-foot-high ornamental steel fence;
- Replacement of gates within property and along the perimeter;
- Improvements to the slopes behind the Administration Building and Water Quality Laboratory to reduce stormwater runoff flows;
- Landscaping, tree trimming, and/or tree and vegetation removal;
- Replacement of security cameras and gate access/intercom; and
- Installation of security motion-activated lighting by the Administration Building and Water Quality Laboratory.

Analysis of Alternatives

This Draft EIR examines alternatives to the proposed Project in Chapter 5, Alternatives. California Environmental Quality Act (CEQA) Guidelines Section 15126.6(a) states an EIR shall describe “a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project,” as well as provide an evaluation of “the comparative merits of the alternatives.” Pursuant to CEQA Guidelines Section 15126.6(a), an EIR does not need to consider alternatives that are not feasible, nor need it address every conceivable alternative to the project. As discussed in greater detail in Chapter 5, Alternatives, several alternatives were considered but rejected, including removal of certain components from the proposed Project, because these alternatives would not accomplish the basic objectives of the proposed Project or substantially lessen environmental effects. This Draft EIR considers two alternatives to the proposed Project, the No Project Alternative and the No Pump Station Alternative, to determine whether environmental impacts would be similar to, less than, or greater than those of the proposed Project.

The Draft EIR concludes the No Project Alternative is the environmentally superior alternative to the proposed Project because it would avoid the proposed Project’s environmental impacts, which are all either less-than-significant or less-than-significant with mitigation incorporated. However, the environmentally superior alternative would not meet any of the Project objectives. In addition, if the No Project alternative is the environmentally superior alternative, CEQA requires identification of an environmentally superior alternative among the remaining alternatives (CEQA Guidelines Section 15126.6[e]). As a result, between the proposed Project and the No Pump Station alternative, the No Pump Station alternative would be considered the environmentally superior alternative because it would result in similar or fewer impacts to most environmental resources as compared to the proposed Project. However, this alternative would not meet the Project objective of enhancing management of nitrification within the reservoir.

Areas of Controversy

CEQA Guidelines Section 15123(b)(2) requires an EIR identify areas of controversy known to the lead agency, including issues raised by other agencies and the public. No known areas of controversy are associated with the proposed Project.

Issues to Be Resolved

CEQA Guidelines Section 15123(b)(3) requires an EIR contain a discussion of issues to be resolved, including the choice among alternatives and whether or how to mitigate significant effects. There are currently no issues to be resolved for the proposed Project.

Summary of Impacts and Mitigation Measures

Table 1 presents a summary of the identified environmental impacts associated with each threshold analyzed in detail in the Draft EIR, proposed mitigation measures, and the level of significance after mitigation. The complete impact statements and mitigation measures are presented in Chapter 3, *Environmental Impact Analysis*. The level of significance for each impact was determined using thresholds of significance developed for each category of impacts; these criteria are presented in the appropriate sections in Chapter 3. Significant impacts are those adverse environmental impacts that meet or exceed the significance thresholds; less-than-significant impacts would not exceed the thresholds.

As summarized in Table 1, all potentially significant impacts identified would be reduced to less-than-significant levels with the implementation of mitigation measures.

Table 1 Summary of Environmental Impacts, Mitigation Measures and Impacts After Mitigation

Impact	Mitigation Measure(s)	Significance After Mitigation
Air Quality		
<p>Impact AQ-A. The proposed Project would potentially conflict with or obstruct implementation of the applicable air quality plan due to construction emissions. This impact would be potentially significant.</p>	<p>MM AQ-1 Construction Equipment During Project construction activities, the Project Contractor(s) shall implement the following nitrogen oxide reduction measures:</p> <ul style="list-style-type: none"> • All off-road diesel-fueled construction equipment greater than 25 horsepower shall be compliant with federally mandated clean diesel engine emissions standards (United States Environmental Protection Agency Tier 4) or should be alternatively-fueled (e.g., electric); and • Welders, pressure washers, and portable generators shall be electrically-powered, or electricity shall be pulled from the grid in lieu of using generators. 	Less than Significant
<p>Impact AQ-B. Project construction activities would generate criteria air pollutant emissions in excess of established thresholds. This impact would be potentially significant.</p>	MM AQ-1	Less than Significant
<p>Impact AQ-C. Project construction activities would expose sensitive receptors to substantial pollutant concentrations. This impact would be potentially significant.</p>	MM AQ-1	Less than Significant
<p>Impact AQ-D. The proposed Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. This impact would be less than significant.</p>	This impact would be less than significant. No mitigation is required.	Less than Significant
Greenhouse Gas Emissions		
<p>Impact GHG-A. Implementation of the proposed Project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. This impact would be less than significant.</p>	This impact would be less than significant. No mitigation is required.	Less than Significant
<p>Impact GHG-B. Implementation of the proposed Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. No impact would occur.</p>	No impact would occur. No mitigation is required.	No Impact

Impact	Mitigation Measure(s)	Significance After Mitigation
Noise		
Impact NOI-A. The proposed Project would not generate 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. This impact would be less than significant.	This impact would be less than significant. No mitigation is required.	Less than Significant
Impact NOI-B. The proposed Project would not generate excessive groundborne vibration or groundborne noise levels. This impact would be less than significant.	This impact would be less than significant. No mitigation is required.	Less than Significant
Transportation		
Impact TRA-A. The proposed Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. This impact would be less than significant.	This impact would be less than significant. No mitigation is required.	Less than Significant
Impact TRA-B. The proposed Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). This impact would be less than significant.	This impact would be less than significant. No mitigation is required.	Less than Significant
Impact TRA-C. The proposed Project would not substantially increase traffic hazards. This impact would be less than significant.	This impact would be less than significant. No mitigation is required.	Less than Significant
Impact TRA-D. The proposed Project would not result in inadequate emergency access. This impact would be less than significant.	This impact would be less than significant. No mitigation is required.	Less than Significant
Tribal Cultural Resources		
Impact TCR-A. The proposed Project would not cause a substantial adverse change in the significance of a tribal cultural resource. No impact would occur.	No impact would occur. No mitigation is required.	No Impact

1 Introduction

1.1 Overview of the Proposed Project

The Metropolitan Water District of Southern California (Metropolitan) is proposing the Garvey Reservoir Rehabilitation Project (proposed Project), which includes rehabilitation, replacement, and upgrades of several components, including the reservoir cover and liner, inlet/outlet (I/O) tower, valves in the junction structure, facility electrical system, standby generator, surge tank telemetry equipment, and Administration Building and Water Quality Laboratory as well as construction of a new pump station. The proposed Project is intended to accomplish necessary upgrades, improvements, and enhancements at Garvey Reservoir to ensure facility reliability, improve seismic safety and Americans with Disabilities Act (ADA) compliance, and facilitate efficient operations and maintenance.

1.2 Purpose of the Environmental Impact Report

This Draft EIR, which assesses the potential environmental effects of the proposed Project, has been prepared in accordance with the California Environmental Quality Act (CEQA) of 1970 (Public Resources Code [PRC] Section 21000 et seq.) and the Guidelines for Implementation of CEQA (CEQA Guidelines) published by the Natural Resources Agency of the State of California (California Code of Regulations, Title 14, Section 15000 et seq.). Metropolitan is the lead agency under CEQA (PRC Section 21067, as amended), is responsible for the preparation of the Draft EIR, and will use this document to objectively review and assess the proposed Project prior to approval or disapproval of the proposed Project.

An EIR is intended to: (1) inform decision-makers and the public about the potentially significant environmental effects of the proposed activities; (2) identify the ways that significant environmental effects can be avoided or reduced; and (3) prevent significant, avoidable damage to the environment by requiring changes in the proposed Project through the use of alternatives or mitigation measures, to the extent that Metropolitan determines the changes to be feasible (CEQA Guidelines Section 15002; PRC Section 21002.1).

1.3 Scope of the Environmental Impact Report

This Draft EIR focuses on impacts identified to be potentially significant during preparation of the Initial Study (Appendix A). The following environmental resource areas were found to include potentially significant impacts and have been studied in-depth in this Draft EIR:

- Air Quality
- Greenhouse Gas Emissions
- Noise
- Transportation
- Tribal Cultural Resources

Pursuant to CEQA Guidelines Section 15128, an EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. Section 15128 notes such a statement may be contained in an attached copy of an Initial Study. The Initial Study (Appendix A) concludes there is no substantial evidence the proposed Project would have significant impacts on the following resource areas; as such, these resource areas are not discussed further within this Draft EIR:

- Aesthetics
- Agriculture and Forestry Resources
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Utilities and Service Systems
- Wildfire

Additionally, this Draft EIR describes Native American tribal outreach efforts conducted by Metropolitan pursuant to the requirements of PRC Section 21080.3.1 in Section 3.5, *Tribal Cultural Resources*.

1.4 Format of the Environmental Impact Report

This Draft EIR is organized as follows:

- ***Executive Summary***. The summary includes a brief description of the proposed Project, a summary of environmental impacts, a list of proposed mitigation measures that would reduce or avoid impacts, discussion of alternatives considered, description of areas of controversy known to the lead agency, and any issues to be resolved.
- **Chapter 1, *Introduction***. This chapter introduces the proposed Project and describes the scope and purpose of the Draft EIR, provides a brief summary of the CEQA process, and establishes the document format.
- **Chapter 2, *Project Description***. This chapter provides background information on Metropolitan, a discussion of the need and the objectives of the proposed Project, and detail on the construction and operational characteristics of the proposed Project.
- **Chapter 3, *Environmental Impact Analysis***. This chapter constitutes the main body of the Draft EIR and includes the detailed impact analysis for each environmental resource area

listed in Section 1.3, *Scope of the Environmental Impact Report*. Sections 3.1 to 3.5 include a discussion of methods of analysis, existing conditions, the thresholds identified for the determination of significant impacts, and an evaluation of the impacts associated with the proposed Project for each resource area. Where the impact analysis demonstrates the potential for the proposed Project to have a significant impact on the environment, mitigation measures are provided that would minimize the significant effects to the extent feasible. The Draft EIR indicates if the proposed mitigation measures would reduce impacts to less-than-significant levels. The cumulative impacts that would result from implementation of the proposed Project in combination with other past, present, and reasonably foreseeable or probable future projects are discussed in each resource section.

- **Chapter 4, *Other Required CEQA Discussion*.** This chapter discusses additional topics required by CEQA, including growth inducement and irreversible environmental changes.
- **Chapter 5, *Alternatives*.** This chapter provides a description of alternatives to the proposed Project and an evaluation of their potential to reduce or avoid the proposed Project's significant impacts.
- **Chapter 6, *References and Preparers*.** This chapter contains references for all citations included in the Draft EIR as well as a list of preparers and contributors.

1.5 Notice of Preparation

Pursuant to CEQA Guidelines Section 15082, a Notice of Preparation (NOP) of a Draft EIR was prepared and circulated, along with an Initial Study, to interested agencies, organizations, and individuals to afford them an opportunity to respond with specific comments and/or questions regarding the scope and content of the Draft EIR. The public review period occurred between January 17, 2024, and February 16, 2024. The NOP and Initial Study were also sent to the State Clearinghouse (SCH) at the California Governor's Office of Planning and Research. The SCH number assigned to this Draft EIR is SCH No. 2024010394. Pursuant to CEQA Guidelines Section 15082, recipients of the NOP for the proposed Project were requested to provide responses within 30 days of publication of the NOP. Pursuant to CEQA Guidelines Section 15082(b)(2), a lead agency may presume responsible and trustee agencies who do not submit comments within 30 days of the release of an NOP have no responses to be considered.

All comments received during the public review period were considered during the preparation of this Draft EIR. Metropolitan received letters from four agencies and three members of the public in response to the NOP. These commenters include the following:

- California Department of Fish and Wildlife
- California Department of Water Resources
- Native American Heritage Commission
- South Coast Air Quality Management District (SCAQMD)
- Resident: Andy Tsang
- Resident: Daniel Allen
- Resident: James J. Miyashiro

Written comments pertaining to the environmental impacts of the proposed Project are addressed in the analysis contained in the various subsections of Chapter 3, *Environmental Impact Analysis*. The economic or social effects of the proposed Project are not examined herein because, pursuant to CEQA Guidelines Section 15131(a), economic or social effects of a project shall not be treated as

significant effects on the environment; rather, the focus of the analysis shall be on the physical changes. Therefore, any comments pertaining to economic or social effects of the proposed Project are not addressed in this Draft EIR. The NOP and Initial Study are presented in Appendix A of this Draft EIR, along with the comments received on the NOP.

1.6 Availability of a Draft Environmental Impact Report

This Draft EIR will be distributed to various federal, state, regional, county, and city agencies as well as interested parties for a 45-day public review period, which begins on June 12, 2024 and ends on July 29, 2024 in accordance with CEQA Guidelines Section 15087. In addition, this Draft EIR, including supporting technical documentation, is available for review by the general public by appointment during normal operating hours at Metropolitan's offices at 700 North Alameda Street, Los Angeles, California. The document is also available on Metropolitan's website at the following address: <http://www.mwdh2o.com/CEQA>, and a printed copy is available at the Monterey Park Bruggemeyer Library during normal business hours.

Agencies and other interested parties may provide written comments on the Draft EIR before the end of the 45-day public review and comment period. Written comments should be submitted to:

Ms. Michelle Morrison
Senior Environmental Specialist
The Metropolitan Water District of Southern California
Environmental Planning Section
P.O. Box 54153
Los Angeles, California 90054-0153

Comments may also be emailed to EP@mwdh2o.com (reference "Garvey Reservoir Rehabilitation Project EIR" in the subject line). Written comments should include the name, mailing address, telephone number, and email address, if available, of a contact person. In addition, the proposed Project and Draft EIR will be presented at the Monterey Park City Council meeting currently scheduled for June 18, 2024 at 6:00 p.m. at Monterey Park City Hall, located at 320 West Newmark Avenue, Monterey Park, California 91754. Additional information on the City Council meeting, including an agenda, will be posted prior to the meeting at the following address: <https://www.montereypark.ca.gov/AgendaCenter>.

Following the 45-day public review and comment period for the Draft EIR, Metropolitan will prepare a written response for each written comment received on the Draft EIR. The written comments and responses to those comments, as well as EIR changes, if any, will be incorporated into a Final EIR. Pursuant to Section 15092 of the CEQA Guidelines, Metropolitan's Board of Directors will consider the following actions: certify the Final EIR; adopt the Findings of the Fact and Mitigation Monitoring and Reporting Program (MMRP); and approve the proposed Project.

2 Project Description

Metropolitan, the lead agency under CEQA, is proposing the Garvey Reservoir Rehabilitation Project to conduct both rehabilitation and new construction activities at Garvey Reservoir. This chapter describes the proposed Project’s need and objectives, provides a detailed summary of the anticipated construction and operational characteristics, and lists the anticipated permits and approvals required to implement the proposed Project.

2.1 Introduction

Metropolitan is a regional wholesaler that provides water for 26 member agencies to deliver either directly or through their sub-agencies to nearly 19 million people across a 5,200-square mile service area in six counties (Los Angeles, Orange, Riverside, San Bernardino, San Diego, and Ventura) in Southern California. On average, Metropolitan conveys approximately one billion gallons of water daily throughout its distribution system (Metropolitan 2024a). Metropolitan imports water from the State Water Project and from the Colorado River via the Colorado River Aqueduct. In addition to imported water, Metropolitan invests in local resource development along with its member agencies and utilizes groundwater banking and transfer programs. Metropolitan also manages water demands by promoting and investing in conservation and water use efficiency projects. Water supplies are conveyed through Metropolitan’s extensive distribution system, which includes five water treatment plants, approximately 830 miles of large-diameter pipelines and tunnels, and approximately 400 service connections (Metropolitan 2024b).

2.2 Project Location

The Project site is an approximately 142-acre property located at 1061 South Orange Avenue in Monterey Park, California (Assessor’s Parcel Numbers 5260-013-910 and 5260-013-905). The Project site is owned by Metropolitan and is developed with the Garvey Reservoir in the central portion of the site along with appurtenant structures and features, including the Administration Building, Water Quality Laboratory, standby generator, sodium hypochlorite tank farm, and junction structure located in the paved yard on the eastern-central portion of the Project site; a surge tank located immediately south of the reservoir; a construction trailer and paved parking area immediately south of the reservoir; an unpaved construction staging area located immediately northwest of the reservoir; a communications tower and paved parking lot southeast of the reservoir; and paved roadways, power lines, mature trees, and landscaping throughout the Project site. The Project site is secured by chain-link perimeter fencing.

The Project site is regionally accessible from State Route 60 (SR-60), located approximately 0.9 mile south of the Project site and Interstate 10 (I-10), located approximately 1.4 miles north of the Project site. Local access to the Project site is provided by South Orange Avenue, and the Project site has three driveways at the paved yard along South Orange Avenue near the intersection of Tegner Drive. The Project site has a General Plan land use designation of Open Space and is zoned Open Space (O-

S) (City of Monterey Park 2020 and 2024). The Project site is surrounded by residential neighborhoods to the west, north, south, and east; Hillcrest Elementary School to the east; the Monterey Park City Yard to the north; and Garvey Ranch Park (located on Metropolitan fee property and easement) to the north. Figure 1 shows the Project site in a regional context, and Figure 2 shows the Project site in a local context. Figure 3 shows the location of existing and proposed site facilities.

2.3 Project Need and Objectives

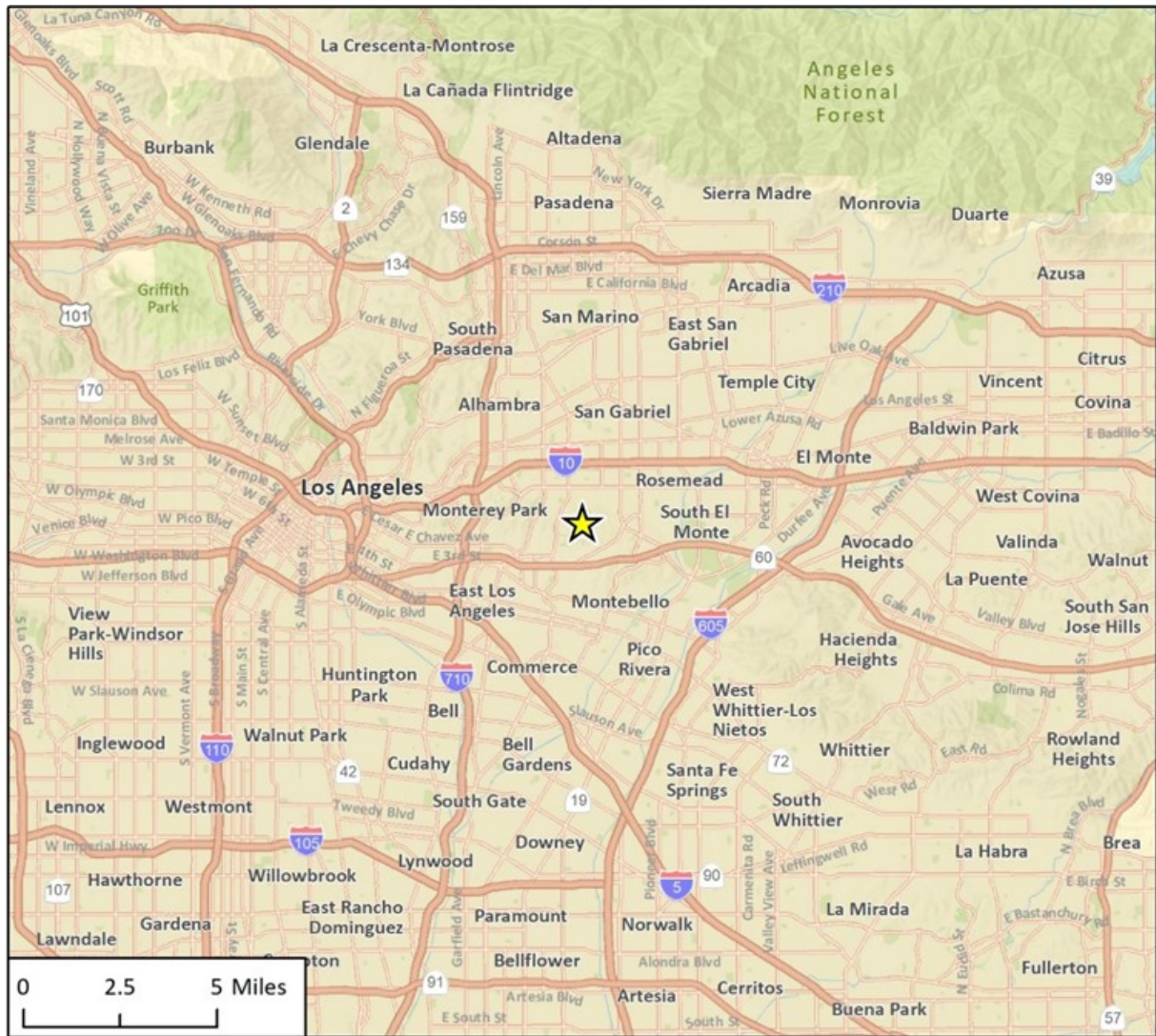
This Draft EIR analyzes potential environmental impacts associated with implementation of the proposed Project. Pursuant to CEQA Guidelines Section 15124(b), an EIR shall contain a statement of objectives sought by the proposed Project. The objectives of the proposed Project include the following:

- Upgrade aging infrastructure to ensure safe and reliable drinking water;
- Improve existing laboratory space through building functional and safety improvements;
- Upgrade features of the Garvey Reservoir facility to improve seismic safety and building code/ADA compliance and to protect public safety and the environment;
- Enhance management of nitrification within the reservoir; and
- Improve existing facilities and install new facilities to enhance operational reliability, minimize the risk of future facility failures, and facilitate efficient operations and maintenance of Garvey Reservoir.

2.4 Background

Garvey Reservoir was constructed in 1954 as an open, asphaltic concrete-lined potable water storage facility on top of a hill with earth-filled embankments in the city of Monterey Park. As discussed below, extensive improvements were made to the reservoir in and around 1999, including replacing the liner with a multi-layer Hypalon liner and installing an extensive seismic and seepage monitoring system. As a component of Metropolitan's Middle Feeder system, the reservoir receives treated water from the F. E. Weymouth Water Treatment Plant and has a maximum storage volume of 1,600 acre-feet. Garvey Reservoir provides critical hydraulic flexibility by stabilizing flowrates within the Middle Feeder and maintaining deliveries to member agency service connections when pipelines are shut down for maintenance. The area served by Garvey Reservoir is commonly referred to as the "Central Pool" and is interconnected by a matrix of pipelines that range from 48 to 79 inches in diameter. The Central Pool covers major portions of Los Angeles and Orange counties and can be supplied by three of Metropolitan's five water treatment plants (F.E. Weymouth, Robert B. Diemer, and Joseph Jensen water treatment plants). The location, capacity, and elevation of Garvey Reservoir create a hydraulic buffer for these treatment plants and allow for variations in flow within Metropolitan's system to be absorbed by the reservoir, minimizing hydraulic changes that could impact the treatment plants. One of the primary benefits to the reliability of Metropolitan's water delivery system is that water can flow in and out of Garvey Reservoir without the need for pumping. This allows the reservoir to buffer flow changes and automatically react to system changes without mechanical, electrical, or operator intervention.

Figure 1 Regional Project Location



★ Project Location

N

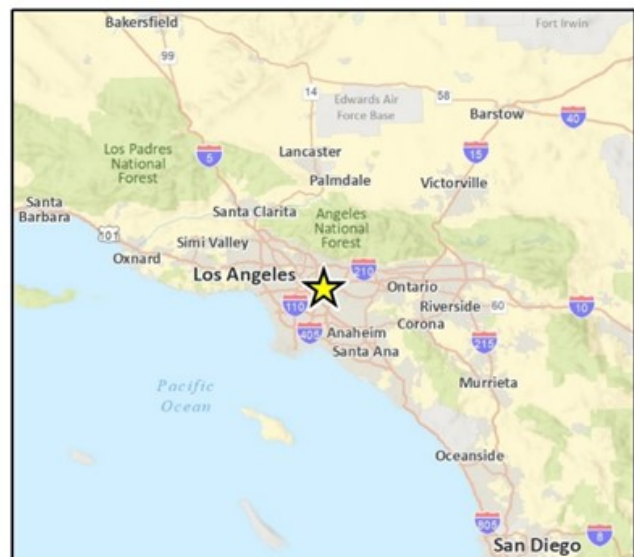
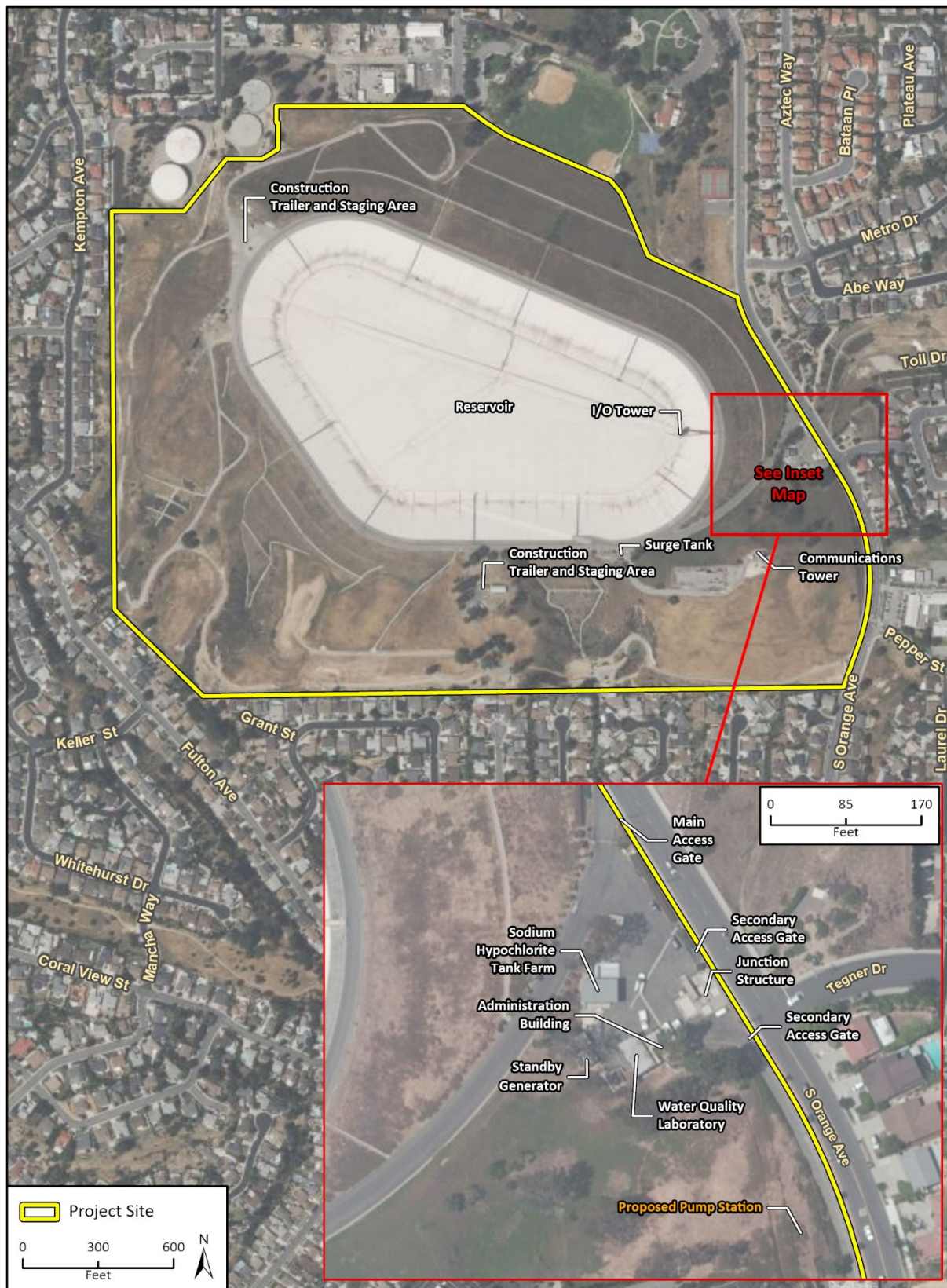


Fig. 2-3 Regional Location

Figure 2 Project Site Location



Figure 3 Existing and Proposed Site Facilities



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Fig 2-3 Existing Site Facilities

The State's Division of Drinking Water requires all finished water reservoirs (i.e., reservoirs storing water that has passed through a water treatment plant) be covered to protect water quality. Floating reservoir covers consist of a thin membrane material that floats on top of the reservoir's water surface. While floating reservoir covers are a cost-effective means of maintaining water quality, the cover material deteriorates over time. If tears develop in the cover material, the potable water supply is susceptible to contamination. In 1983, a floating reservoir cover was installed at Garvey Reservoir. Metropolitan currently has a proactive reservoir cover inspection and maintenance program that includes regular inspections, both above and below the cover, to identify signs of deterioration or damage. This program ensures the floating covers and reservoirs remain in compliance with Division of Drinking Water requirements.

Elevated groundwater levels caused the reservoir to be removed from service in November 1989. Extensive geotechnical testing indicated that regional folding, intensified by the 1987 Whittier Narrows Earthquake, resulted in foundation cracking such that water from the reservoir fed the underlying groundwater table. Between 1989 and 1999, the reservoir was out of service for repairs and upgrades. Work performed between 1989 and 1999 included:

- Repairing cracks in the cement-paved reservoir bottom;
- Converting the cover installed in 1983 into a bottom liner placed on top of the asphaltic concrete;
- Installing a geo-textile cushion on top of the bottom liner;
- Installing a polypropylene liner on top of the geo-textile cushion;
- Connecting the drainage layer to an alarm system to monitor seepage;
- Installing a polypropylene liner on top of the drainage layer;
- Installing a network of automatic sensing and remote recording piezometers; and
- Installing a new floating cover.

2.5 Description of Proposed Project

The proposed Project consists of several rehabilitation components and one new component, each of which is described in detail in the following subsections. The location of each Project component is shown in Figure 3 under Section 2.2, *Project Location*.

Reservoir Cover and Liner

The Garvey Reservoir floating cover is a weight-tensioned type cover that is approximately 1,900,000 square feet in size. A series of weights and floats are placed on top of the cover. Sand-filled weight tubes create troughs that serve as rainwater collection channels. In addition, the floating cover is equipped with 13 rainwater removal pumps. The existing polypropylene floating cover and flexible membrane liner were installed between 1996 and 1999. The proposed Project includes the following items related to the reservoir cover and liner:

- Redesign of the I/O tower float assembly;
- Replacement of the polypropylene liner and disposal of the existing liner material;
- Inspection of the reservoir drainage system underneath the liner (including the underlying geo-textile cushion, underdrain, circulation piping) and peripheral piping and repair or upgrade of the system and piping, if needed;
- Upgrade of the leak detection and monitoring system;
- Installation of a new floating cover;

- Completion of start-up testing procedures including cover inflation, chlorination, emergency dewatering, and instrument testing.

I/O Tower

Garvey Reservoir is equipped with an I/O tower located at the east end of the reservoir. The I/O tower was originally designed for control flexibility, and water flows in or out of the reservoir at various elevations of the I/O tower by the operation of gates located at different elevations. The proposed Project includes seismic rehabilitation of the I/O tower and access bridge. Equipment within the I/O tower and lighting fixtures along the access bridge would also likely be upgraded and replaced. In addition, whether or not the fixtures along the access bridge are replaced, light-emitting diode (LED) lights would be installed in the fixtures.

Junction Structure

The existing junction structure, which was originally constructed in the 1950s, is located to the east of the Administration Building, directly adjacent to South Orange Avenue. The majority of the junction structure is located underground in a subterranean vault with only the roof and access stairway visible at street-level. The function of the junction structure is essential to water distribution within the Central Pool through the Middle Feeder.

The proposed Project includes replacement of five valves in the junction structure to improve reliability. This component of the proposed Project requires review and approval by the California Department of Water Resources Division of Safety of Dams because a different type of valve would be installed to improve performance. The Division of Safety of Dams regulates these valves because they are required for emergency dewatering of Garvey Reservoir.

The timing of implementation of this proposed Project component is contingent on several factors, including:

1. The reservoir and junction structure cannot be out of service at the same time;
2. The pipelines within the junction structure cannot all be out of service at the same time; and
3. Upstream and downstream pipelines of the junction structure, such as those distributing water from the Robert B. Diemer and/or Joseph Jensen water treatment plants, must be in service to accommodate a partial junction structure shutdown.

Facility Electrical System

The facility electrical system, which includes instrumentation at the Project site, is aged and outdated, which presents maintenance challenges in that some replacement parts are no longer carried by manufacturers. In addition to an aging electrical system, upgrade and/or redesign of the existing electrical system is needed to provide consistent power sources (240-volt to 480-volt), and to replace relays at the switchgear unit, the control panel, and other items. Most of the proposed Project electrical system work would be located underground between the Administration Building/Water Quality Laboratory and the sodium hypochlorite tank farm.

Standby Generator

The existing standby generator and its appurtenant electrical system, including transfer switches and the switchgear unit, are over 30 years old and have exceeded their useful life. The proposed Project includes replacement of these features along with upgrades to meet current emission and fire codes under the United States Environmental Protection Agency's (USEPA) Emission and Fuel Standards Program. The new generator would likely be larger than the existing generator. The existing concrete

block building housing the generator would be demolished. The new generator would either be in the open air under a canopy structure or would be in a new, enclosed building. The standby generator is located at ground level between the Administration Building/Water Quality Laboratory and the sodium hypochlorite tank farm.

The new standby generator would have a capacity of 200 kilowatts with a minimum of 770-gallon sub-base fuel tank. The generator would be a Caterpillar C7.1 FSBTJ48 diesel generator, which is a Tier 3 generator, or similar model and would be housed in a weather-protective SA Level 2 enclosure to reduce noise levels.

Surge Tank Telemetry

An existing 1,000-gallon surge tank is part of the on-site domestic water system located at the top of the reservoir embankment, immediately south of the reservoir. The tank and its telemetry, including pumps and pressure switch, are from the original reservoir construction in the 1950s. The proposed Project includes improvements to the telemetry equipment connecting the surge tank to the pumps and installation of a direct cable from the pumps in the junction structure to the surge tank pressure switch. The Project also includes upgrades to the pressure switches and automated tank controls.

Administration Building and Water Quality Laboratory

The Administration Building and Water Quality Laboratory are both located within the former chlorination building that was part of the original reservoir construction in the 1950s and later converted to its current functions. The proposed Project includes upgrades and rehabilitation of the interior of the Water Quality Laboratory. The proposed laboratory improvements would enhance efficiency, reliability, and safety while providing a workspace that meets current best practice standards for laboratories to ensure compliance with USEPA and California Department of Public Health water quality regulations. The proposed Project includes the following:

- Design of a new interior plan layout for the entire building;
- Relocation of the existing Water Quality Laboratory to the Administration Building and vice versa;
- Relocation of the emergency eye wash station from outside the Administration Building to immediately adjacent to the Water Quality Laboratory;
- Provision of a new ADA-compliant parking stall with accessible path of travel to the building entrance;
- Modifications to the existing restroom for compliance with the 2010 ADA Standard for Accessible Design and 2022 California Building Codes (or most recent iteration in effect at the time);
- Reconstruction of a retaining wall on the south side of the building to prevent ponding and overflow from precipitation;
- Upgrades to the water heater and heating, ventilation, and air conditioning (HVAC) system, including installation of a 100 percent outside air split system adjacent to the Administration Building and Water Quality Laboratory, a condenser at ground-level, and a roof-mounted exhaust fan for the new Water Quality Laboratory; and
- Upgrades to enhance safety features.

Pump Station

The proposed Project includes the construction of a new pump station adjacent to South Orange Avenue to allow for better drought operating conditions, water quality, and flow range. The new

pump station would be approximately 150 feet south of the junction structure and would house multiple pumps and valves to provide operational flexibility. The pump station would be built of concrete and masonry, approximately 500 square feet in size, and partially recessed about 10 feet into the hillside adjacent to South Orange Avenue. A subsurface valve tie-in to the Middle Feeder is also proposed and would be actuated when the pump station is utilized.

Miscellaneous Site Upgrades

Numerous, smaller site components may be repaired or rehabilitated as part of the proposed Project. These miscellaneous upgrades may include:

- Upgrades to the ammonia feed system;
- Repaving or repairing existing reservoir roads;
- Replacement of perimeter chain link fencing with an eight-foot-high ornamental steel fence;
- Replacement of gates within property and along the perimeter;
- Improvements to the slopes behind the Administration Building and Water Quality Laboratory to reduce stormwater runoff flows;
- Landscaping, tree trimming, and/or tree and vegetation removal;
- Replacement of security cameras and gate access/intercom; and
- Installation of security motion-activated lighting by the Administration Building and Water Quality Laboratory.

2.6 Construction Schedule

Project construction activities would occur in three main phases. The first phase would involve work on the reservoir cover and liner and the I/O tower. The second phase would involve work on the junction structure. Other site work related to the facility electrical system, standby generator, surge tank telemetry, Administration Building, Water Quality Laboratory, and miscellaneous site upgrades would occur simultaneously during both Phases 1 and 2. Both Phase 1 and Phase 2 would occur between approximately September 2025 and December 2027. Phase 3 would occur after Phases 1 and 2 are complete and would involve construction of the proposed pump station and ammonia feed system. Phase 3 would occur from approximately January 2034 to June 2035.

Construction activities would typically occur Monday through Friday between the hours of 7:00 a.m. and 3:00 p.m., which is within the City of Monterey Park's (City) permitted hours. Limited work may be conducted on Saturdays as needed with the approval of Metropolitan staff, which is allowed under Monterey Park Municipal Code (MPMC) Section 4.50.050 for public works projects. While the majority of construction would occur during daytime hours, occasional nighttime activities would be required during the construction period for Metropolitan staff conducting water quality testing and inspections as the reservoir fills up with water. These nighttime activities would not require the use of heavy-duty construction equipment.

2.7 Construction Characteristics

Project construction would involve demolition and removal of existing facilities, rehabilitation and construction of new infrastructure, paving, and landscaping. Prior to the start of work in the reservoir (Phase 1), water would be drained from the reservoir through the junction structure into the Middle Feeder. Any water below the intake at the I/O tower would be pumped out and drained through existing v-ditches to the stormwater drainage system. All water discharged to the stormwater drainage

system would be dechlorinated prior to discharge. Replacement of valves in the junction structure (Phase 2) would occur after the reservoir has been emptied and re-filled. Construction of the pump station facility and ammonia feed system would occur after all other Project construction activities at the reservoir are complete (Phase 3).

Demolition of the existing standby generator structure, diesel fuel tank, standby generator, reservoir cover and liner, portions of asphalt paving, and the interior of the Water Quality Laboratory would be required. Table 2 presents the anticipated demolition debris quantities associated with the proposed Project. The existing cover and liner materials would not require special disposal requirements. Demolition debris would be hauled to either the Puente Hills Materials Recovery Facility at 13130 Crossroads Parkway South in the City of Industry, or the Waste Management Azusa Land Reclamation facility at 1121 West Gladstone Street in Azusa. The haul route for the Waste Management Azusa Land Reclamation facility would likely proceed north from the Project site toward the I-10 via South Orange Avenue, Graves Avenue, and New Avenue. The haul route for the Puente Hills Materials Recovery Facility would likely proceed south from the Project site to SR-60 via South Orange Avenue, Saturn Street, and Potrero Grande Drive.

Table 2 Anticipated Project Demolition Debris Quantities

Project Component	Item Proposed for Demolition	Amount of Demolished Material
Reservoir Cover and Liner	Existing reservoir floating cover	1.8 million square feet
	Primary geomembrane liner	1.75 million square feet
	Composite drainage course	1.75 million square feet
	Secondary geomembrane liner	1.75 million square feet
	Non-woven geotextile cushion layer	1.1 million square feet
	Geomembrane chafer	1.1 million square feet
Facility Electrical System	Asphalt paving	180 cubic feet
Standby Generator	Existing generator and fuel tank	400 square feet
Administration Building and Water Quality Laboratory	Various interior components	1,845 square feet
Miscellaneous Site Upgrades	Asphalt paving	160 square feet

Replacement of the reservoir liner would not require substantial amounts of soil movement. The asphalt and clay layers located below the reservoir liner would be recompacted but would not be removed. Up to approximately 5,000 cubic yards of soil would be imported to the Project site, primarily for purposes of installing a temporary construction ramp into the reservoir. Grading would also occur behind the Water Quality Laboratory Building to help control stormwater runoff behind the structure. The maximum depth of excavation would be 15 feet, which would be required for pump station construction.

Approximately one to two delivery trucks would occur per day during construction activities to transport construction equipment and materials to the Project site. In addition, approximately 640 cubic yards of concrete would be imported to the Project site for seismic upgrades to the I/O tower.

Lead-based paints and coatings may be present on older mechanical features, such as the valves, epoxy, and I/O tower railings. Asbestos may also be present in some components to be removed or demolished. If lead-based paints and coatings are present, the Project Contractor(s) would comply with California Occupational Safety and Health Administration (CalOSHA) regulations, specifically California Code of Regulations Section 1532.1, which requires testing, monitoring, containment, and disposal of lead-based materials such that exposure levels do not exceed CalOSHA standards. If asbestos is present, the Project Contractor(s) would comply with SCAQMD Rule 1403 (Asbestos

Emissions from Demolition/Renovation Activities), which requires that the owner or operator of any demolition or renovation activity have an asbestos survey performed prior to demolition.

Tree trimming and/or removal may be required for access to and installation of the proposed pump station along South Orange Avenue. Miscellaneous vegetation trimming or removal may be required around the reservoir to accommodate construction activities, including areas around the construction trailers, near the Water Quality Laboratory, adjacent to entrance gates along South Orange Avenue, and the two cover/rainwater detention basins along the south reservoir property line. In addition, during the replacement of perimeter fencing, the sidewalk along the southbound lane of South Orange Avenue may be closed temporarily for a period of approximately two weeks.

Construction vehicles would access the Project site via the three access driveways at the paved yard along South Orange Avenue near its intersection with Tegner Drive. Construction staging would occur at an existing construction staging area located immediately northwest of the reservoir and an existing, partially paved construction trailer area immediately south of the reservoir. Construction worker parking would primarily occur at the construction trailer area as well as at other areas throughout the Project site. If there are space limitations at the site, the Project Contractor(s) would carpool workers from to and from the Project site.

Environmental Requirements for Construction

Metropolitan has established standardized environmental protocols and requirements for contractors and Metropolitan staff engaging in construction activities, which are outlined primarily in Section 01065 (Environmental Compliance Requirements) of Metropolitan's standard construction contractor specifications as well as Sections 01070 (Storm Water Pollution Prevention Plan), 01550 (Access, Parking, and Traffic), 01565 (Noise Control), and 02110 (Clearing, Grubbing, and Stripping). These requirements are intended to ensure best practices are in place during all construction phases and to reduce and/or avoid environmental impacts. In addition, Metropolitan's engineering project specification package also includes design practices for contractors during construction to reduce or avoid impacts to the environment.

Relevant construction requirements are summarized below and are referenced throughout Section 3, *Environmental Impact Analysis and Mitigation Measures*, where applicable:

- Obtain and comply with the applicable local, state, and federal environmental permits.
- Comply with the Federal Migratory Bird Treaty Act and California Fish and Game Code Section 3503, including conducting pre-construction nesting bird surveys and implementation of avoidance measures, where applicable.
- Prepare, submit, and comply with the surface and storm water control measures in compliance with the Water Pollution Control Program or Stormwater Pollution Prevention Plan for individual projects greater than one acre.
- Prepare and comply with a Traffic Control Plan, including the use of appropriate advance warning signage to alert motorists to the potential for cross construction vehicle traffic from the work limits in accordance with Caltrans standards.
- Perform all work without undue noise and make every effort to abate or prevent noise nuisances.
- Maintain all construction vehicle equipment in proper working order for the duration of the construction activities.
- Equip all construction equipment, fixed and mobile, including internal combustion engines, with properly operating and maintained noise mufflers and intake silencers, consistent with the manufacturers' standards.

- Cover or locate all stationary noise-generating equipment, such as generators and compressors, as far as practicable from the nearest residential/institutional property lines to attenuate noise.
- Comply with the applicable local tree protection ordinance.
- Protect any sensitive cultural and paleontological resources by halting work within 50 feet of an unanticipated discovery for evaluation of the find by a qualified professional, require archaeological and/or paleontological monitoring for sites with high sensitivity, and comply with California Health and Safety Code Section 7050.5 and PRC Section 5097.98 in the event that human remains are discovered.

Construction Equipment

Potential construction equipment needed for the proposed Project is listed in Table 3.

Table 3 Construction Equipment List

Project Component	Construction Equipment
Reservoir Cover/Liner	Three generators, one rubber-tired loader, four pressure washers, two rough terrain forklifts, one sweeper/scrubber
I/O Tower	Two backhoes, one bore/drill rig, one compactor, five compressors, two cranes, two dozers, two excavators, ten small generators, one grader, two rubber-tired loaders, two skid steer loaders
Junction Structure	Two backhoes, three compressors, one crane, one excavator, three generators, one rubber-tired loader, one paving equipment, one roller, one skid steer loader, one welder
Facility Electrical System	Two aerial lifts, one backhoe, two compressors, one crane, one excavator, one forklift, three generators, one grader, one rubber-tired loader, one paving equipment, two rollers, one skid steer loader
Standby Generator	Two aerial lifts, one backhoe, two compressors, one crane, one excavator, one forklift, three generators, one grader, one rubber-tired loader, one paving equipment, two rollers, one skid steer loader
Surge Tank Telemetry	One backhoe, two compressors, one crane, one excavator, one forklift, three generators, one grader, one rubber-tired loader, one paving equipment, two rollers, one skid steer loader
Administration Building/Water Quality Laboratory	One backhoe, two compressors, one crane, one excavator, one forklift, three generators, one grader, one rubber-tired loader, one paving equipment, two rollers, one skid steer loader.
Pump Station	One backhoe, one excavator, one forklift, three generators, one rubber-tired loader, one skid steer loader
Miscellaneous Site Upgrades	One backhoe, one dozer, one excavator, one forklift, three generators, one grader, one rubber-tired loader, one paving equipment, two rollers, two skid steer loaders

2.8 Operational Characteristics

Operations and maintenance activities at Garvey Reservoir, including the frequency of staff visits, monthly testing of the standby generator, and water usage in the Administration Building and Water Quality Laboratory, would be similar to existing conditions once construction activities are completed. The proposed pump station would be an unmanned structure, and any operations or maintenance to the facility would be completed using existing Metropolitan staff. The new pump station would increase on-site electricity usage by approximately 450,000 kilowatt-hours (kWh) per year.

2.9 Potential Permits and Discretionary Approvals

Table 4 lists the anticipated permits and discretionary approvals that may be required for Project-related activities. One of the purposes of this Draft EIR is to provide these agencies with information to support the agency permitting process. Table 4 also lists the types of activities that would be subject to these requirements.

Table 4 Permits and Approvals Which May Be Required¹

Agency/Department	Permit/Approval	Description
State of California		
California Department of Water Resources - Division of Safety of Dams	Review and Approval of Valve Replacement and tower modifications	This permit would be required for any modifications to the existing liner, floating cover, I/O tower, and valves.
California Department of Water Resources – Division of Drinking Water	Approval of materials used for the floating cover	This approval would be required to confirm compliance with floating cover performance criteria, disinfection methodology, and the use of National Sanitation Foundation 61 certified products.
Regional		
South Coast Air Quality Management District	Permit to Construct	This permit would be required for installation of the new standby generator (SCAQMD Rule 1470).
	Permit to Operate	This permit would be required for operation of the new standby generator (SCAQMD Rule 1470).
Local		
City of Monterey Park	Noise Permit	This permit may be required for construction activities lasting longer than three days.

¹ California Government Code Section 53091 exempts Metropolitan, as a regional public water purveyor and utility, from local zoning ordinances and local building codes. At Metropolitan facilities, this exemption has been interpreted to pertain only to activities directly related to the storage, conveyance, and transmission of drinking water.

3 Environmental Impact Analysis and Mitigation Measures

Introduction

This chapter introduces the organization of the environmental resource sections, which contain the various impact analyses, as well as the methodology and terminology used throughout this Draft EIR. It explains the overall methodology used to analyze impacts along with the methodology for the cumulative impact analysis.

Environmental Analysis Scope and Organization

Resource Sections

Sections 3.1 through 3.5 of this chapter contain discussions on the potentially significant impacts of the proposed Project. Each of these sections corresponds with a specific environmental resource area. To assist the reader in comparing information about the various environmental issues, each section of this chapter is organized in the following manner.

- **Existing Conditions.** Describes the existing or baseline conditions in each resource study area for the proposed Project. The baseline conditions for the proposed Project correspond to the time the Notice of Preparation for the proposed Project was published (January 17, 2024).
- **Regulatory Framework.** Provides the federal, state, and local regulations for each resource area that apply to the proposed Project.
- **Thresholds and Methodology.** Identifies the thresholds for determining whether a significant impact would occur with implementation of the proposed Project, in accordance with CEQA Guidelines Appendix G. Describes the methods used for the analysis of impacts and any assumptions that were made in the analysis of impacts.
- **Impacts Analysis.** Presents the evaluation of impacts that would result from implementation of the proposed Project and any mitigation measures that would be necessary to reduce these impacts. The impact analysis compares the proposed Project to existing conditions, also known as the CEQA baseline, and includes the analysis of cumulative impacts for each environmental resource area, evaluated by considering the impacts of the proposed Project when combined with impacts of other projects and programs within the resource study area, and a discussion on the level of significance after mitigation.

The analysis contained in this Draft EIR addresses both construction and operational impacts associated with implementation of the proposed Project.

Methodology and Terminology Used in the Analysis

In evaluating the potential impacts of the proposed Project, the level of significance is determined by applying the thresholds of significance presented for each resource area. The environmental analyses in Sections 3.1 through 3.5 include a detailed discussion and final impact determination for the proposed Project.

To determine significance, the environmental conditions with implementation of the proposed Project are compared to the baseline condition. The difference between environmental conditions with implementation of the proposed Project and baseline conditions is then compared to a threshold to determine if the difference is significant. CEQA Guidelines Section 15125 requires an EIR include a description of the physical environmental conditions in the vicinity of a proposed project that exist at the time the Notice of Preparation is published (the NOP comment period was open from January 17, 2024 to February 16, 2024). This environmental setting serves as the baseline by which the lead agency determines whether an impact is significant. The baseline condition to which the proposed Project is compared is described in each resource section to determine the significance of impacts.

The following terms are used to describe the level of impact in each resource section:

- **No Impact.** A finding of no impact is made when no adverse changes to the environment are expected.
- **Less-than-significant Impact.** A less-than-significant impact is identified when the proposed Project would cause no substantial adverse change to the environment (i.e., the impact would not exceed the threshold of significance).
- **Less-than-significant Impact with Mitigation Incorporated.** A significant impact is identified when the proposed Project would create a substantial adverse change in any of the physical environmental conditions within the affected resource area. Such an impact would exceed the applicable significance threshold established by CEQA but would be reduced to a less-than-significant level with incorporation of one or more mitigation measures.
- **Significant and Unavoidable Impact.** A significant and unavoidable impact is identified when an impact that would cause a substantial adverse effect on the environment cannot be reduced to a less-than-significant level through implementation of any feasible mitigation measure(s).

Mitigation refers to measures that would be implemented to avoid or lessen potentially significant impacts. Pursuant to CEQA Guidelines Section 15370, mitigation includes:

- Avoiding the impact altogether by not taking a certain action or parts of an action.
- Minimizing the impact by limiting the degree or magnitude of the action and its implementation.
- Rectifying the impact by repairing, rehabilitating, or restoring the affected environment.
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- Compensating for the impact by replacing or providing substitute resources or environments.

Mitigation measures would be required as conditions of Project approval and would be monitored to ensure compliance and implementation.

Analysis for each resource area is followed by a determination of the level of significance after mitigation. The level of significance after mitigation is the determination of the level of impact after implementation of the identified mitigation measures. The level of significance after mitigation is

expressed as no impact, less-than-significant impact, less-than-significant impact with mitigation incorporated, or significant and unavoidable impact, as defined above.

Cumulative Analysis Methodology

A cumulative impact is created as a result of the combination of the project evaluated in an EIR together with other projects causing related impacts. CEQA Guidelines require an EIR discuss the cumulative impacts of a project when the project's incremental effect is "cumulatively considerable," meaning that the project's incremental effects are considerable when viewed in connection with the effects of past, current, and probable future projects. According to CEQA Guidelines Sections 15130(a) and (b), the purpose of cumulative analysis is to provide a discussion of significant cumulative impacts that reflects "the severity of the impacts and their likelihood of occurrence." CEQA Guidelines Section 15130(b) indicates the discussion of cumulative impacts should include:

- Either (A) a list of past, present, and probable future projects producing related or cumulative impacts; or (B) a summary of projections contained in an adopted general plan or similar document, or in an adopted or certified environmental document, which described or evaluated conditions contributing to a cumulative impact;
- A discussion of the geographic scope of the area affected by the cumulative effect;
- A summary of expected environmental effects to be produced by these projects; and
- Reasonable, feasible options for mitigating or avoiding the Project's contribution to any significant cumulative effects.

The cumulative impacts analysis in this chapter focuses on the effects of concurrent construction and operation of the proposed Project with existing development and other spatially and temporally proximate projects planned for development in the future. This analysis relies on a list of projects that have the potential to contribute to cumulative impacts within and near the Project site.

Cumulative Projects and Timing

This analysis considers the impacts of the proposed Project in combination with the potential environmental effects of other projects (also referred to as cumulative projects). Cumulative projects include recently completed projects, projects currently under construction, and future projects currently in development. The potential for projects to have a cumulative impact depends on both geographic location as well as project implementation schedule.

A project's schedule is particularly relevant to the consideration of cumulative construction-related impacts because construction impacts tend to be relatively short-term. However, for future projects, construction schedules are often broadly estimated and can be subject to change. Although the timing of the future cumulative projects (i.e., those not currently under construction) is likely to fluctuate due to schedule changes or other unknown factors, this analysis conservatively assumes these projects would be implemented concurrently with the proposed Project.

Geographic Scope

The proposed Project would be located in Monterey Park in central Los Angeles County. The cumulative impact analysis in this chapter considers the potential cumulative effects of the proposed Project in combination with existing development and future development projects occurring within a similar geographic area, referred to as the cumulative setting. However, the cumulative setting affected by cumulative projects varies depending on the environmental topic. For example, construction noise impacts would be limited to localized areas directly affected by construction noise, whereas the area affected by a project's air pollutant emissions generally includes the entire air basin.

Description of Cumulative Projects

Table 5 lists the current and proposed projects that could potentially contribute to cumulative impacts within the cumulative setting, defined as a one-mile radius surrounding Garvey Reservoir. In addition to the projects listed in Table 5, further development that has not yet been identified could occur within the cumulative setting, as planned by the City of Monterey Park, City of Rosemead, and/or County of Los Angeles (e.g., in the unincorporated South San Gabriel community). For cumulative projects where a specific anticipated construction schedule is not known at this time, the analysis conservatively assumes cumulative project construction activities may overlap with Project construction activities.

Table 5 Cumulative Projects List¹

Location	Project Name	Project Sponsor	Type of Development	Units/Square Footage	Status
City of Monterey Park					
Southeast corner of Garfield Avenue and Garvey Avenue	Celadon Project	Private Developer	Mixed-Use	71,366 square feet of commercial space and a 109-unit condominium complex	Approved by City Council
Portero Grande Drive	Potrero Grande Renovation	City of Monterey Park	Road Improvement	Median islands, pavement rehabilitation, infill tree planting in parkways, irrigation systems, sidewalk and curb ramp improvements	In Design
Intersections of Portero Grande Drive with Markland Drive and Market Place Drive	Portero Grande Signal Improvements at Market Place and Markland	City of Monterey Park	Road Improvement	Traffic signal improvements	Out to Bid
Portero Grande Drive	Potrero Grande Regional Project	City of Monterey Park	Road Improvement	Construction of bicycle facilities, missing sidewalks, roadway rehabilitation, curb ramps, and pedestrian improvements	In Design
Garfield Avenue	Adaptive Traffic/Traffic Responsive Control System	City of Monterey Park	Road Improvement	Upgrades to the traffic signal system	In Design
318 South Ramona Avenue	Library Improvements - Storyroom Expansion and Stained Glass	City of Monterey Park	Library Construction	Expansion of the existing library and installation of stained glass windows	In Design

Location	Project Name	Project Sponsor	Type of Development	Units/Square Footage	Status
Browning Place, East Markland Drive, West Gleason Street, Wilcox Avenue, East Elmgate Street, East Andrix Street, Grandridge Avenue, Punita Way	SB1 Residential Street Rehabilitation	City of Monterey Park	Road Improvement	Asphalt removal and overlay construction; construction of new curb ramps; sidewalk repairs; traffic striping and pavement marking	Under Construction since February 2024
City of Rosemead					
3454 Burton Avenue	Residential Project	Private Developer	Residential	Construction of a new, 3,251-square foot single-family dwelling	Discretionary Application Submitted
7660 Garvalia Avenue	Residential Project	Private Developer	Residential	Construction of four duplexes (1,644 square feet to 1,657 square feet) and two detached accessory dwelling units (1,030 square feet)	Discretionary Application Submitted
7600 East Graves Street	Transitional Housing	Private Developer	Residential	Legalization and expansion of existing uses	Discretionary Application Submitted
7741 and 7745 Hellman Avenue	Residential Project	Private Developer	Residential	10 small-lot subdivision	Discretionary Application Submitted

¹ No cumulative projects in the unincorporated community of South San Gabriel were identified within a one-mile radius of the Project site.

Sources: City of Monterey Park 2024a and 2024b; City of Rosemead 2024

3.1 Air Quality

3.1.1 Introduction

This section describes the existing conditions, regulatory framework, and potential impacts to air quality that would result from the proposed Project, including potential conflicts with applicable air quality plans, exceedance of air quality standards from criteria pollutant emissions, exposure of sensitive receptors to substantial pollutant concentrations, and other emissions adversely affecting a substantial number of people. The analysis of air quality is based primarily on the Air Quality and Greenhouse Gas Emissions Study prepared by Rincon Consultants, Inc. in April 2024. The Air Quality and Greenhouse Gas Emissions Study is provided as Appendix B to the Draft EIR.

3.1.2 Existing Conditions

California is divided geographically into 15 air basins for managing the air resources of the state on a regional basis. The Project site is located in Monterey Park, which is within the South Coast Air Basin (SCAB). The SCAB, which is regulated by the SCAQMD, is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto mountains to the north and east. The SCAB includes the non-desert portions of Los Angeles, Riverside, and San Bernardino counties, in addition to all of Orange County and the San Geronio Pass area in Riverside County. A detailed discussion of the regional climate and air quality conditions in the SCAB is provided in Appendix B.

3.1.2.1 Criteria Air Pollutants

Air pollutants regulated by federal and state law are known as criteria air pollutants and are categorized either as primary pollutants or secondary pollutants. Primary air pollutants are those pollutants emitted directly from various stationary and mobile sources, including carbon monoxide, volatile organic compounds (VOC), nitrogen oxide (NO_x), sulfur dioxide, respirable and fine particulate matter (particulate matter 10 microns or less in diameter [PM₁₀] and particulate matter 2.5 microns or less in diameter [PM_{2.5}], respectively), and lead. Of these, carbon monoxide, sulfur dioxide, PM₁₀, PM_{2.5}, and lead are criteria pollutants. VOCs and NO_x are precursors that form secondary criteria pollutants, such as ozone and nitrogen dioxide, through chemical and photochemical reactions in the atmosphere. Presented below is a brief description of each of the primary and secondary criteria air pollutants and their known health effects. A detailed discussion of criteria air pollutants is provided in Appendix B.

- **Ozone** - Ozone, a colorless toxic gas, is produced by a photochemical reaction (triggered by sunlight) between NO_x and VOCs. Nitrogen oxides are formed during the combustion of fuels, while VOCs are formed during incomplete combustion of fuels as well as evaporation of organic solvents. Although upper atmospheric ozone protects the Earth from the sun's harmful rays, ground-level ozone is the main component of smog. It enters the bloodstream and interferes with the transfer of oxygen, depriving sensitive tissues in the heart and brain of oxygen. Although ozone is not directly emitted, it forms in the atmosphere through a photochemical reaction between VOCs and NO_x in the presence of sunlight (i.e., smog) (USEPA 2023a and 2023b).

- **Organic Gases – Precursors to Ozone** - There are several subsets of organic gases, including reactive organic gases and VOCs.¹ Both VOCs and reactive organic gases are emitted from incomplete combustion of hydrocarbons or other carbon-based fuels. Combustion engine exhaust, oil refineries, and oil-fueled power plants are the primary sources of hydrocarbons. Another source of hydrocarbons is evaporation from petroleum fuels, solvents, dry-cleaning solutions, and paint. In general, the terms “reactive organic gases” and “VOCs” are used interchangeably to refer to the hydrocarbons that are precursors to ozone formation. The primary health effects of hydrocarbons result from the formation of ozone and its related health effects, which are discussed above.
- **Carbon Monoxide** - Carbon monoxide is emitted almost exclusively from incomplete combustion of fossil fuels. In urban areas, carbon monoxide is emitted by motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. Automobile exhaust is the largest carbon monoxide contributor in urban areas. When inhaled at high concentrations, carbon monoxide reduces the oxygen-carrying capacity of the blood, which reduces oxygen reaching the brain, heart, and other body tissues. This condition is especially critical for people with cardiovascular diseases, chronic lung disease, or anemia (USEPA 2023c).
- **Nitrogen Dioxide** - Nitrogen dioxide is a brownish gas that irritates the lungs. It can cause breathing difficulties at high concentrations. Similar to ozone, nitrogen dioxide is not directly emitted but is formed through a reaction between nitric oxide and atmospheric oxygen. In addition, nitrogen dioxide can increase the risk of acute and chronic respiratory disease (UESPA 2023d).
- **Particulate Matter** - Particulate matter pollution consists of very small liquid and solid particles floating in the air, including smoke, soot, dust, salts, acids, and metals. Particulate matter also forms when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. Major sources of PM₁₀ include motor vehicles; wood burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions. PM_{2.5} results from fuel combustion (from motor vehicles, power generation, and industrial facilities), residential fireplaces, and wood stoves. In addition, PM₁₀ and PM_{2.5} can be formed in the atmosphere from gases such as sulfur dioxide, NO_x, and VOCs (SCAQMD 1993).

Both PM₁₀ and PM_{2.5} pose a greater health risk than larger size particles because when inhaled, these tiny particles can penetrate the human respiratory system’s natural defenses and damage the respiratory tract. PM₁₀ and PM_{2.5} can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body’s ability to fight infections. Very small particles of substances, such as lead, sulfates, and nitrates, can cause lung damage directly. These substances can be absorbed into the bloodstream and cause damage elsewhere in the body; they can also transport adsorbed contaminants such as chlorides or ammonium into the lungs and cause injury (SCAQMD 1993; USEPA 2023e).

- **Sulfur Dioxide** - The main source of sulfur dioxide is combustion of coal and oil used in power stations, industries, and domestic heating. Industrial chemical manufacturing is another source of sulfur dioxide. Sulfur dioxide is an irritant gas that can cause acute respiratory symptoms and diminished respiratory function in children. (SCAQMD 1993; USEPA 2024).
- **Lead** - Lead is a metal found naturally in the environment as well as in manufacturing products. Lead occurs in the atmosphere as particulate matter. Metal processing currently is

¹ Hydrocarbons are organic gases that are formed solely of hydrogen and carbon. Reactive organic gases include all hydrocarbons except those exempted by the California Air Resources Board. Therefore, reactive organic gases are a subset of organic gases based on state rules and regulations. VOCs are similar to reactive organic gases in that they include all organic gases except those exempted by federal law.

the primary source of lead emissions. Other stationary sources include waste incinerators, utilities, and lead-acid battery manufacturers. Lead may cause a range of health effects, including anemia, kidney disease, and, in severe cases, neuromuscular and neurological dysfunction (USEPA 2023f).

3.1.2.2 Toxic Air Contaminants

No ambient air quality standards exist for toxic air contaminants (TACs) because no exposure level has been deemed safe for humans. Pollutants are identified as TACs because of their potential to increase the risk of developing cancer or their acute or chronic health risks. Individual TACs vary greatly in the risk they present. At a given level of exposure, one TAC may pose a hazard that is many times greater than another. For certain TACs, a unit risk factor can be developed to evaluate cancer risk. For acute and chronic health risks, a similar factor, called a Hazard Index, is used to evaluate risk.

To date, the California Air Resources Board (CARB) has identified 21 TACs and adopted the USEPA's list of hazardous air pollutants as TACs. In August 1998, CARB identified diesel exhaust particulate matter (DPM) emissions as a TAC. TACs may also be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. The Multiple Air Toxics Exposure Study (MATES) V completed by SCAQMD indicates 67 percent of overall cancer risk from TACs is attributed to DPM in the SCAB, and the immediate region around the Project site has an estimated carcinogenic risk of 549 in a million (SCAQMD 2018).

3.1.2.3 Existing Regional and Local Air Quality

Existing ambient air quality conditions in the SCAB are determined by the amount of emissions released by sources and the atmosphere's ability to transport and dilute the emissions. Air quality conditions are also influenced by topography, wind speed, wind direction, and air temperature gradients, which interact to move and disperse air pollutants. SCAQMD maintains monitoring stations within its boundaries that monitor air quality and compliance with associated ambient air quality standards.

SCAQMD has divided its jurisdictional territory of the SCAB into 38 source receptor areas (SRAs) designed to provide a general representation of local meteorological, terrain, and air quality conditions in each area. The Project site is located within SRA 11, South San Gabriel Valley. Based on historical concentrations measured within and near SRA 11 for 2020 through 2022 (the most recent three years for which CARB has data readily available²), local ozone concentrations exceeded federal and state standards in all three years, and local PM_{2.5} concentrations exceeded the federal standard in all three years. Local concentrations of PM₁₀, nitrogen dioxide, sulfur dioxide, and carbon monoxide did not exceed federal or state standards in any of the three years (Appendix B).³ A detailed discussion of existing regional and local air quality is provided in Appendix B.

² Draft ambient air quality monitoring data is available for year 2023; however, this data had not been finalized by CARB as of the date of this EIR.

³ Aggregated air quality data from monitoring stations throughout the SCAB is used to inform determinations of attainment and nonattainment for federal and state air quality standards. Therefore, even though air quality data at one monitoring station may show no exceedances of federal and state standards for a certain pollutant, the overall SCAB may still be classified as nonattainment for that same pollutant based on the overall results of air quality monitoring data throughout the region.

3.1.2.4 Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. CARB has identified the following groups most likely to be affected by air pollution: children less than 14 years of age, the elderly over 65 years of age, athletes, and people with cardiovascular and chronic respiratory diseases. According to SCAQMD, sensitive receptors are land uses where populations more susceptible to the adverse effects of air pollution exposure are likely to spend considerable amounts of time. The SCAQMD and CARB guidance documents recommend that sensitive receptor locations include residences, schools, playgrounds, child-care centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes (Appendix B). Sensitive receptors in the vicinity of the Project site include residential neighborhoods to the west, north, south, and east; Hillcrest Elementary School to the east across South Orange Avenue; and Garvey Ranch Park to the north. Additional sensitive receptors are located farther from the Project site in the surrounding community and would be less affected by air pollutant emissions than these sensitive receptors.

3.1.3 Regulatory Framework

This section describes the plans, policies, and regulations related to air quality that are applicable to the proposed Project. A more detailed discussion of the regulatory framework pertaining to air quality is provided in Appendix B.

3.1.3.1 Federal

Federal Clean Air Act

The federal Clean Air Act regulates the emission of airborne pollutants from various mobile and stationary sources. The USEPA is the federal agency designated to administer air quality regulation and has established National Ambient Air Quality Standards (NAAQS) for major pollutants at thresholds intended to protect public health. Federal standards have been established for ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, lead, PM₁₀, and PM_{2.5}. The SCAB is designated nonattainment (extreme) for the federal 8-hour ozone standard, nonattainment (serious) for the federal PM_{2.5} standard, partial non-attainment for lead for near-source monitors in Los Angeles County, and maintenance/attainment for all other federal standards. A detailed discussion of the NAAQS and the attainment status of the SCAB is provided in Appendix B.

3.1.3.2 State

California Clean Air Act

The California Clean Air Act, signed into law in 1988, requires all areas of the state to achieve and maintain the California Air Quality Standards (CAAQS) by the earliest practical date. The CAAQS incorporate additional standards for most of the criteria pollutants and set standards for other pollutants recognized by the state. In general, the California standards are more health-protective than the corresponding NAAQS. California has also set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. The SCAB is designated nonattainment for the state 1-hour and 8-hour ozone standards, PM₁₀ standard, and PM_{2.5} standard and attainment for all other state standards. A detailed discussion of the CAAQS and the attainment status of the SCAB is provided in Appendix B.

State Tailpipe Emission Standards

To reduce emissions from off-road diesel equipment and on-road diesel trucks, CARB established a series of increasingly strict emission standards for new engines, such as the Advanced Clean Trucks regulation, approved in June 2020 (Title 13 California Code of Regulations Sections 1963 to 1963.5 and 2012 to 2012.2). New construction equipment used for the proposed Project, including medium- and heavy-duty trucks and off-road construction equipment, would be required to comply with these standards.

Toxic Air Contaminants

California regulates TACs primarily through the Toxic Air Contaminant Identification and Control Act (Tanner Act) and the Air Toxics “Hot Spots” Information and Assessment Act of 1987 (“Hot Spots” Act). The Tanner Act created California’s program to reduce exposure to air toxics. The “Hot Spots” Act supplements the Tanner Act by requiring a statewide air toxics inventory, notification of people exposed to a significant health risk, and facility plans to reduce these risks. In addition, in response to Assembly Bill (AB) 617 (C. Garcia, Chapter 136, Statutes of 2017), CARB established the Community Air Protection Program, which selects communities disproportionately impacted by high cumulative exposure burdens for criteria air pollutants and TACs and develops community air monitoring plans and community emissions reduction programs for these communities.

CARB identified DPM as a TAC in 1998. Shortly thereafter, CARB approved a comprehensive Diesel Risk Reduction Plan to reduce emissions from both new and existing diesel-fueled engines and vehicles. The goal of the plan is to reduce DPM emissions and the associated health risk by 75 percent in 2010 and by 85 percent by 2020. The plan identifies several measures for CARB to implement, which have been enacted since publication of the plan (CARB 2000). CARB estimates that DPM emissions in 2035 will be less than half of those in 2010 (CARB 2024). The proposed Project would be required to comply with applicable diesel control measures.

The Children's Environmental Health Protection Act (Senate Bill [SB] 25 of 1999) focuses on children's exposure to air pollutants. The act requires CARB to review its air quality standards from a children's health perspective, evaluate the statewide air quality monitoring network, and develop any additional air toxic control measures needed to protect children's health.

3.1.3.3 Regional and Local

South Coast Air Quality Management District

SCAQMD attains and maintains air quality conditions in the SCAB through a comprehensive program of planning, regulation, enforcement, technical innovation, and promotion of the understanding of air quality issues. The clean air strategy of SCAQMD includes preparation of plans for attainment of ambient air quality standards, adoption and enforcement of rules and regulations concerning sources of air pollution, and issuance of permits for stationary sources of air pollution.

Air Quality Management Plan

SCAQMD is responsible for developing and adopting an air quality management plan (AQMP), which serves as guidance to bring the region into compliance with the NAAQS and CAAQS. The most recent iteration of the AQMP, the 2022 AQMP, was adopted on December 2, 2022 and includes strategies and measures needed to meet the NAAQS (SCAQMD 2022). The 2022 AQMP identifies that the Basin still has high levels of ozone (smog) as a result of high NO_x emissions. In addition, on October 1, 2015, the USEPA strengthened the NAAQS for ground-level ozone, lowering the primary and secondary ozone standard levels to 70 parts per billion. As a result, the 2022 AQMP addresses

additional control strategies for meeting this more stringent standard. In order to reduce ozone levels, extensive use of zero emission technologies across all stationary and mobile sources is proposed by the 2022 AQMP. The 2022 AQMP notes an essential component to meeting the ozone NAAQS will be substantial reliance on future deployment of advanced technologies. Implementing advanced control technologies is projected to result in attainment of the ozone NAAQS by 2037 for the SCAB (SCAQMD 2022).

Rules and Regulations

SCAQMD also has adopted a set of rules and regulations pertaining to various emissions sources such as mobile source, facility-based mobile source, and point source polluters. All projects are subject to SCAQMD rules and regulations in effect at the time of construction. Rules applicable to the proposed Project include, but are not limited to, the following (Appendix B):

- **Rule 401: Visible Emissions.** This rule is intended to prevent the discharge of pollutant emissions from an emissions source that results in visible emissions.
- **Rule 402: Nuisance.** This rule is intended to prevent the discharge of pollutant emissions from an emissions source that results in a public nuisance.
- **Rule 403: Fugitive Dust.** This rule is intended to reduce the amount of particulate matter entrained in the ambient air as a result of anthropogenic (human-made) fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions.
- **Rule 1108 - Volatile Organic Compounds.** This rule governs the sale, use, and manufacturing of asphalt and limits the VOC content in asphalt used in the SCAB. This rule also regulates the VOC content of asphalt used during construction.
- **Rule 1113: Architectural Coatings.** The rule prohibits any person to apply or solicit the application of any architectural coating within the SCAQMD with VOC content in excess of the values specified in Rule 1113.
- **Rule 1143 – Paint Thinners and Solvents.** This rule governs the manufacture, sale, and use of paint thinners and solvents used in thinning coating materials, cleaning of coating application equipment, and other solvent cleaning operations by limiting their VOC content.
- **Rule 1186 – Fugitive Dust.** This rule limits the generation of fugitive dust on paved and unpaved roads. It sets certification protocols and requirements for street sweepers that are under contract to provide sweeping services to any federal, state, county, agency, or special districts such as water, air, sanitation, transit, or school district.
- **Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines.** This rule limits the emissions of NO_x, VOC, and carbon monoxide from stationary and portable engines over 50 brake horsepower, including standby generators.
- **Rule 1401 – New Source Review of Toxic Air Contaminants.** This rule specifies limits for maximum individual cancer risk, cancer burden, and noncancer acute and chronic hazard index from new stationary sources that generate TAC emissions.
- **Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines.** This rule establishes operating standards for stationary diesel-fueled engines, including specific requirements for standby generators such as limits on non-emergency operation and particulate matter emission rates.

Toxic Air Contaminants

SCAQMD limits emissions and public exposure to TACs through a number of programs. Under SCAQMD Regulation XIV (Toxics and Other Non-Criteria Pollutants), and in particular Rule 1401

(New Source Review), all sources with the potential to emit TACs are required to obtain permits from SCAQMD. Permits may be granted to these operations if they are constructed and operated in accordance with applicable regulations, including new source review standards and air toxics control measures. SCAQMD prioritizes TAC-emitting stationary sources based on the quantity and toxicity of the TAC emissions and the proximity of the facilities to sensitive receptors.

City of Monterey Park General Plan

The Resource Element of the City’s General Plan contains goals and policies designed to reduce air pollution generated by vehicles and energy consumption. These include, but are not limited to, expansion of public transportation, promotion of mixed-use land use designations, encouraging the use of alternative fuels, and improving traffic flow through and within the City (City of Monterey Park 2001).

3.1.4 Thresholds and Methodology

3.1.4.1 Thresholds of Significance

Table 6 lists the thresholds from Appendix G of the CEQA Guidelines that pertain to air quality, which are addressed in the Draft EIR.

Table 6 CEQA Thresholds for Air Quality

Threshold
Would the proposed 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?

Metropolitan has not developed specific air quality thresholds for air quality impacts. However, Appendix G of the CEQA Guidelines states the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the determinations in Table 6. As such, the significance thresholds and analysis methodologies in the SCAQMD’s guidance documents will be used in evaluating air quality impacts, including the following

- SCAQMD (1993) CEQA Air Quality Handbook (currently being updated) and supplemental guidance
- SCAQMD (2008) Final Localized Significance Threshold Methodology
- SCAQMD (2023) South Coast AQMD Air Quality Significance Thresholds

The following subsections discuss the significance criteria established by SCAQMD to make the determinations in Table 6 for thresholds (a) through (d).

Consistency with Applicable Air Quality Plan

Based on SCAQMD guidance (SCAQMD 1993), consistency with the AQMP is determined based on the following two criteria:

- Whether the proposed Project would result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP
- Whether the proposed Project would exceed the growth assumptions in the AQMP

Regional Criteria Air Pollutant Emissions

Table 7 presents the significance criteria established by SCAQMD to evaluate a project’s potential to result in a cumulatively considerable net increase of criteria pollutants. Although the SCAB is only designated as nonattainment for certain pollutants, the SCAQMD has adopted thresholds for evaluating emissions of all criteria pollutants.

Table 7 SCAQMD Regional Air Quality Significance Thresholds

Pollutant	Mass Daily Emission Thresholds (pounds per day)	
	Construction	Operation
Nitrogen Oxides (NO _x)	100	55
Volatile Organic Compounds (VOC)	75	55
Respirable Particulate Matter (PM ₁₀)	150	150
Fine Particulate Matter (PM _{2.5})	55	55
Sulfur Oxides (SO _x)	150	150
Carbon Monoxide (CO)	550	550
Lead ¹	3	3

¹ Because the proposed Project would not involve the development of any major lead emissions sources; lead emissions are not analyzed in this Draft EIR.

Source: SCAQMD 2023

Exposure of Sensitive Receptors to Substantial Pollutant Concentrations

Criteria Air Pollutant Emissions

Localized Significance Thresholds (LSTs) were developed by SCAQMD in response to exposure of individuals to criteria pollutants in local communities and have been developed for NO_x, carbon monoxide, PM₁₀, and PM_{2.5}. LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the applicable federal or state ambient air quality standard at the nearest sensitive receptor. LSTs have been developed for emissions generated in construction areas up to five acres in size. However, LSTs only apply to emissions in a fixed stationary location and are not applicable to mobile sources, such as cars on a roadway.

To minimize efforts, the SCAQMD developed mass rate lookup tables as a simple screening procedure. If a project’s on-site emissions do not exceed the screening levels for any pollutant, it can be concluded the project would not cause or contribute to an adverse localized air quality impact. Screening levels are provided for various distances between the project boundary and the nearest sensitive receptor and for various project site acreages. Screening levels increase as the distance between the project boundary and the nearest receiver increases because air pollutant dispersion increases with distance. Screening levels also increase as the project site acreage increases because

the distance between construction and operation sources and sensitive receptors increases with project acreage.

The LST mass rate lookup tables account for ambient pollutant concentrations based on the SRA in which a project site is located. The LST methodology includes screening levels for one-, two-, and five-acre sites at distances of 82 feet (25 meters), 164 feet (50 meters), 328 feet (100 meters), 656 feet (200 meters), and 1,640 feet (500 meters) from the nearest sensitive receptor.

The Project site is in SRA 11 (South San Gabriel Valley). Emissions were evaluated against the most stringent LST screening level distance. Emission thresholds for one- and five-acre sites at distances between 82 feet (25 meters) and 382 feet (100 meters) were used in the analysis for NO_x, carbon monoxide, PM₁₀, and PM_{2.5}. The screening thresholds are used since it is assumed less than 10 acres would be disturbed per day during construction. Applicable LST screening levels are shown in Table 8.

Table 8 Significance Thresholds for Localized Emissions of Criteria Air Pollutants

Pollutant	Mass Daily On-site Emissions Thresholds (pounds per day)					
	1 acre			5 acres		
	25 meters	50 meters	100 meters	25 meters	50 meters	100 meters
NO _x /NO ₂	83	84	96	183	176	184
CO	673	760	1,113	1,814	1,984	2,549
PM ₁₀	5	13	29	14	43	59
PM _{2.5}	4	5	9	9	12	19

NO_x/NO₂ = nitrogen oxides; CO = carbon monoxide; PM₁₀ = particulate matter 10 micrometers in diameter or less; PM_{2.5} = fine particulate matter 2.5 micrometers in diameter or less

Source: SCAQMD 2009

Toxic Air Contaminant Emissions

SCAQMD has developed significance thresholds for TAC emissions based on health risks associated with elevated exposure to such compounds. For carcinogenic compounds, cancer risk is assessed in terms of incremental excess cancer risk (i.e., the additional cancer risk created by a project above the existing background cancer risk, evaluated at the level of an individual person) and cancer burden (i.e., the increase in the occurrence of cancer cases created by a project, evaluated at the population-level). A project would have the potential to result in a significant impact if it would generate an incremental excess cancer risk of 10 cases in one million persons (1 x 10⁻⁶) or a cancer burden of 0.5 excess cancer cases in areas where cancer risk exceeds one in one million. Additionally, non-carcinogenic health risks are assessed in terms of a hazard index. A hazard index is the potential for non-cancer health effects to occur as a result of exposure to TACs. A project would have the potential to result in a significant impact if it would result in a chronic and/or acute hazard index greater than 1.0 (SCAQMD 2023).

3.1.4.2 Methodology

The analysis of proposed Project impacts to air quality is based on the Air Quality and Greenhouse Emissions Study prepared by Rincon Consultants, Inc. in April 2024 (Appendix B). This report presents a detailed discussion of the methodology used in evaluating impacts of the proposed Project, including quantification of Project emissions using the California Emissions Estimator Model (CalEEMod) version 2022.1.1.21, dispersion modeling using the USEPA-approved American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD), and quantification of health risk using health risk calculation methodology consistent with the 2015 Office

of Environmental Health Hazard Assessment guidance and SCAQMD's South Coast AQMD Modeling Guidance for AERMOD. Because operations and maintenance activities (e.g., frequency of staff visits, standby generator testing, water usage in Administration Building/Water Quality Laboratory) would remain the same as existing conditions under the proposed Project after completion of construction, operational air pollutant emissions were not quantified. In addition, the proposed Project does not include sources of lead emissions; therefore, lead is not discussed further in this section.

3.1.5 Impacts Analysis

3.1.5.1 Project Analysis

Threshold AQ-A: *Would the proposed Project conflict with or obstruct implementation of the applicable air quality plan?*

The Project site is within the SCAB, which falls in the jurisdiction of the SCAQMD; therefore, the applicable air quality plan is SCAQMD's 2022 AQMP. Pursuant to SCAQMD guidance, the consistency of the proposed Project with the SCAQMD 2022 AQMP is evaluated based on the two criteria established by the SCAQMD CEQA Air Quality Handbook (SCAQMD 1993):

1. Whether the proposed Project would result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP
2. Whether the proposed Project would exceed the growth assumptions in the AQMP

Violations of federal and state air quality standards would occur if the proposed Project would generate emissions in excess of SCAQMD regional thresholds or LSTs set forth in Table 7 and Table 8, respectively. As shown in Table 9 under Threshold AQ-B, Phase 1 construction activities would generate emissions of NO_x (an ozone precursor) that would exceed the SCAQMD regional threshold. Construction activities during Phases 2 and 3 as well as Project operation would not generate emissions in excess of SCAQMD regional thresholds. However, because of the exceedance of the SCAQMD regional threshold for NO_x (an ozone precursor) during Phase 1 construction activities, the Project would potentially result in an increase in frequency or severity of existing air quality violations, cause or contribute to a new violation, or delay timely attainment of the air quality standards in the AQMP, specifically related to ozone, pursuant to criterion #1.

The Project site is located in an urban area, and it is likely construction workers for the proposed Project would be sourced from the existing, regional workforce and would not indirectly result in the relocation of people to Los Angeles County. The proposed Project would not involve additional housing, require new employees, or result in additional water supplies; therefore, the proposed Project would not directly or indirectly result in population growth. The proposed Project also would not require zone changes, conditional uses, or entitlements that would modify the existing zoning or land use designations of the Project site, which was used, in part, to develop 2022 AQMP growth assumptions and emission inventories. Therefore, the proposed Project would not generate new growth that would conflict with or obstruct implementation of the 2022 AQMP pursuant to criterion #2.

In light of the above discussion, the proposed Project would potentially result in an increase in frequency or severity of existing air quality violations, cause or contribute to a new violation, or delay timely attainment of the air quality standards in the AQMP, specifically related to ozone. Therefore, pursuant to criteria #1 established by the SCAQMD *CEQA Air Quality Handbook*, without

mitigation, the proposed Project would be inconsistent with the AQMP, and impacts would be **significant**. Implementation of MM AQ-1 (detailed in Section 3.1.5.3, *Mitigation Measure*), which involves the use of off-road diesel-fueled construction equipment greater than 25 horsepower that are compliant with federally mandated clean diesel engine emissions standards (USEPA Tier 4) as well as certain electrically powered construction equipment, would be required. Further information on how this measure would reduce impacts to less than significant can be found in Section 3.1.5.3, *Mitigation Measure*.

Applicable Mitigation Measure: MM AQ-1

Significance Determination: Less than significant with mitigation incorporated

Threshold AQ-B: *Would the proposed 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?*

As discussed in Section 3.1.3, *Regulatory Framework*, the SCAB is designated non-attainment (extreme) for 8-hour ozone NAAQS and non-attainment (serious) for the PM_{2.5} NAAQS as well as partial non-attainment for lead for near-source monitors in Los Angeles County. The SCAB is also designated non-attainment for the ozone, PM₁₀, and PM_{2.5} CAAQS. The SCAB is designated unclassifiable or in maintenance/attainment for all other federal and State standards.

Construction Emissions

Project construction would involve demolition, site preparation, grading, infrastructure installation, building construction, paving, and architectural coating. Construction of the proposed Project would result in temporary increases in air pollutant emissions from construction equipment operation on site, construction worker vehicle trips to and from the site, and haul trips to transport materials, demolition debris, and soil to and from the Project site. The nature and magnitude of construction emissions would vary from day to day, depending primarily on the level of activity and the construction equipment in use.

Table 9 summarizes the estimated maximum daily regional air pollutant emissions generated during Project construction. As shown therein, emissions generated during Phase 1 construction activities would exceed the SCAQMD regional threshold for NO_x (a precursor to ozone), primarily due to high emissions during the completion of seismic upgrades to the I/O tower, but would not exceed the remaining SCAQMD regional thresholds for criteria air pollutant emissions. Emissions generated during Phases 2 and 3 of construction activities would not exceed SCAQMD regional thresholds for criteria air pollutant emissions. The high NO_x emissions during Phase 1 would primarily be the result of the use of numerous construction equipment throughout the Project site to complete various Project activities. Because of the exceedance of the SCAQMD threshold for NO_x (a precursor to ozone) during Phase 1 of construction activities, Project construction would potentially result in a cumulatively considerable net increase of a criteria pollutant for which the SCAB is nonattainment under an applicable federal or state ambient air quality standard, specifically ozone. Therefore, without mitigation, the proposed Project would result in a **significant** impact related to construction emissions of NO_x. Implementation of MM AQ-1 (detailed in Section 3.1.5.3, *Mitigation Measure*), which involves the use of off-road diesel-fueled construction equipment greater than 25 horsepower that are compliant with federally mandated clean diesel engine emissions standards (USEPA Tier 4) as well as certain electrically powered construction equipment, would be required. Further information on how this measure would reduce impacts to less than significant can be found in Section 3.1.5.3, *Mitigation Measure*.

Applicable Mitigation Measure: MM AQ-1**Significance Determination:** Less than significant with mitigation incorporated**Table 9 Proposed Project Regional Construction Criteria Air Pollutant Emissions**

Year	Maximum Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Phase 1 (2025-2027)						
Reservoir Cover and Liner	1	11	13	<1	12	2
I/O Tower	8	54	62	<1	4	2
Facility Electrical Upgrades	3	18	18	<1	2	1
Standby Generator	3	17	17	<1	2	1
Surge Tank Telemetry	2	14	18	<1	1	1
Administration Building and Water Quality Lab	2	14	18	<1	1	1
Miscellaneous Site Upgrades	2	14	17	<1	3	2
Maximum Total Daily Construction Emissions – Phase 1	20	142	164	<1	23	9
SCAQMD Regional Thresholds	75	100	550	150	150	55
Threshold Exceeded?	No	Yes	No	No	No	No
Phase 2 (2027)						
Junction Structure	3	20	30	<1	2	1
Facility Electrical Upgrades	3	18	18	<1	2	1
Standby Generator	4	17	17	<1	2	1
Surge Tank Telemetry	2	14	18	<1	1	1
Administration Building and Water Quality Laboratory	2	14	18	<1	1	1
Miscellaneous Site Upgrades	2	14	17	<1	3	2
Maximum Total Daily Construction Emissions – Phase 2	14	97	119	<1	10	6
SCAQMD Regional Thresholds	75	100	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No
Phase 3 (2034-2035)						
Pump Station	1	4	6	<1	1	<1
Maximum Total Daily Construction Emissions – Phase 3	1	4	6	<1	1	<1
SCAQMD Regional Thresholds	75	100	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

VOC = volatile organic compounds; NO_x = nitrogen oxide; CO = carbon monoxide; SO_x = sulfur oxide; PM₁₀ = particulate matter with a diameter no more than 10 microns; PM_{2.5} = particulate matter with a diameter no more than 2.5 microns

Source: Appendix B

Operational Emissions

Operations and maintenance activities at Garvey Reservoir, including the frequency of staff visits, monthly testing of the standby generator, and water usage in the Administration Building and Water Quality Laboratory, would remain the same as existing conditions and would result in no net change in criteria air pollutant emissions once construction activities are completed. Although the proposed

pump station would result in a net increase in annual electricity consumption of approximately 450,000 kWh, air pollutant emissions associated with electricity usage are attributed to power plants themselves rather than individual projects.⁴ Therefore, Project operation would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in non-attainment under an applicable federal or state ambient air quality standard, and **no impact** would occur.

Applicable Mitigation Measure: None required

Significance Determination: No impact

Threshold AQ-C: *Would the proposed Project expose sensitive receptors to substantial pollutant concentrations?*

As noted in Section 3.1.2, *Existing Conditions*, sensitive receptors in the vicinity of the Project site include residential neighborhoods to the west, north, south, and east; Hillcrest Elementary School to the east across South Orange Avenue; and Garvey Ranch Park to the north.

Localized Construction Emissions

Criteria Air Pollutants

Construction of the proposed Project would result in temporary increases in local air pollutant concentrations as a result of the use of heavy-duty construction equipment and vehicle trips generated by construction workers and the transport of construction materials, demolition debris, and soil. Particulate matter emissions would primarily result from site preparation and grading activities, and nitrogen dioxide and carbon monoxide emissions would primarily result from the use of construction equipment and truck trips. Construction emissions would vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Table 10 summarizes maximum daily on-site emissions associated with construction of the proposed Project. Because construction activities would be dispersed throughout the approximately 142-acre Project site, maximum on-site emissions from each major construction activity area were estimated at the nearest sensitive receptors to that area during each of the three main construction phases. As shown in Table 10, on-site construction emissions of NO_x, carbon monoxide, and PM_{2.5} would not exceed the SCAQMD LSTs during any phase of construction. However, on-site emissions of PM₁₀ would exceed the applicable SCAQMD LST for PM₁₀ during Phase 1 if all Project components are under construction on the same day.⁵ As a result, the proposed Project would potentially expose sensitive receptors to substantial criteria pollutant concentrations during construction. Therefore, without mitigation, the proposed Project would result in a **significant** impact related to localized construction emissions of PM₁₀. Implementation of MM AQ-1 (detailed in Section 3.1.5.3, *Mitigation Measure*), which involves the use of off-road diesel-fueled construction equipment greater than 25 horsepower that are compliant with federally mandated clean diesel engine emissions standards (USEPA Tier 4) as well as certain electrically powered construction equipment, would be required. Further information on how this measure would reduce impacts to less than significant can be found in Section 3.1.5.3, *Mitigation Measure*.

⁴ Pursuant to the CalEEMod User Guide, “because power plants are existing stationary sources permitted by air districts and/or the USEPA, criteria pollutant emissions are generally associated with the power plants themselves, and not individual buildings or electricity users. Additionally, criteria pollutant emissions from power plants are subject to local, state, and federal control measures, which can be considered the maximum feasible level of mitigation for stack emissions” (California Air Pollution Control Officers Association 2022).

⁵ Simultaneous construction of all Project components in Phase 1 on the same day represents a reasonable, worst-case scenario for purposes of this analysis. Although considered a reasonable scenario for this evaluation, it is unlikely to actually occur during Project construction, and localized air pollutant emissions are therefore likely to be lower than those estimated in this report.

Applicable Mitigation Measure: MM AQ-1**Significance Determination:** Less than significant with mitigation incorporated**Table 10 Estimated Maximum Localized Criteria Air Pollutant Emissions During Construction**

Phase	Maximum On-site Emissions (pounds per day)			
	NO _x /NO ₂	CO	PM ₁₀	PM _{2.5}
Reservoir Cover and Liner (Phase 1)				
Reservoir Cover and Liner	8	11	11	2
Total Maximum Daily On-site Emissions – Reservoir Cover and Liner	8	11	11	2
Applicable SCAQMD LST (5-Acre Work Site, 100 Meters to Nearest Sensitive Receptor)	184	2,549	59	19
Threshold Exceeded?	No	No	No	No
Eastern-Central Yard (Administration Building, Water Quality Laboratory, Standby Generator, Junction Structure) (Phases 1 and 2)				
Junction Structure	20	30	2	1
Facility Electrical Upgrades	18	16	1	1
Standby Generator	17	16	1	1
Administration Building/Water Quality Laboratory	14	16	1	<1
Total Maximum Daily On-site Emissions – Eastern-Central Yard	68	79	51	3
Applicable SCAQMD LST (1-Acre Work Site, 25 Meters to Nearest Sensitive Receptor)	83	673	5	4
Threshold Exceeded?	No	No	No	No
I/O Tower and Surge Tank (Phase 1)				
I/O Tower	53	56	2	2
Surge Tank Telemetry	14	16	1	<1
Total Maximum Daily On-site Emissions – I/O Tower and Surge Tank	67	72	3	2
Applicable SCAQMD LST (1-Acre Work Site, 100 Meters to Nearest Sensitive Receptor)	96	1,113	29	9
Threshold Exceeded?	No	No	No	No
Sitewide (Phase 1)				
Reservoir Cover and Liner	8	11	11	2
I/O Tower	53	56	2	2
Surge Tank Telemetry	14	16	1	<1
Facility Electrical Upgrades	18	16	1	1
Standby Generator	17	16	1	1
Administration Building/Water Quality Laboratory	14	16	1	<1
Miscellaneous Site Upgrades	14	17	2	1
Combined Daily	138	148	19	7
Applicable SCAQMD LST (5-Acre Work Site, 25 Meters to Nearest Sensitive Receptor)	183	1,814	14	9
Threshold Exceeded?	No	No	Yes	No

Phase	Maximum On-site Emissions (pounds per day)			
	NO _x /NO ₂	CO	PM ₁₀	PM _{2.5}
Sitewide (Phase 2)				
Junction Structure	20	30	2	1
Surge Tank Telemetry	14	16	1	<1
Facility Electrical Upgrades	18	16	1	1
Standby Generator	17	16	1	1
Administration Building/Water Quality Laboratory	14	16	1	<1
Miscellaneous Site Upgrades	14	17	2	1
Combined Daily ¹	97	111	8	4
Applicable SCAQMD LST (5-Acre Work Site, 25 Meters to Nearest Sensitive Receptor)	183	1,814	14	9
Threshold Exceeded?	No	No	No	No
Pump Station (Phase 3)				
Pump Station	3	6	<1	<1
Total Maximum Daily On-site Emissions – Pump Station	3	6	<1	<1
Applicable SCAQMD LST (1-Acre Work Site, 25 Meters to Nearest Sensitive Receptor)	83	673	5	4
Threshold Exceeded?	No	No	No	No

NO_x/NO₂ = nitrogen oxides; CO = carbon monoxide; PM₁₀ = particulate matter 10 micrometers in diameter or less; PM_{2.5} = particulate matter 2.5 micrometers in diameter or less; SCAQMD = South Coast Air Quality Management District; LST = Localized Significance Threshold

Note: Some numbers may not add up precisely due to rounding considerations.

¹ Estimated total PM₁₀ emissions are 4.76 pounds per day, which does not exceed the threshold of 5 pounds per day.

Source: Appendix B.

Fugitive Dust Emissions

Project construction activities would result in temporary generation of fugitive dust emissions, primarily from site preparation and excavation activities, transport of soil, and movement of heavy-duty construction equipment on unpaved surfaces. The Project Contractor(s) would be required to comply with SCAQMD Rule 403. Rule 403 is intended to reduce the amount of particulate matter in the air due to fugitive dust sources by requiring actions to minimize the creation of fugitive dust. Rule 403 includes the following measures and is applicable as necessary to the proposed Project:

- Nontoxic chemical soil stabilizers shall be applied according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more).
- Active sites shall be watered at least twice daily. Locations where grading is to occur shall be thoroughly watered prior to earthmoving.
- All trucks hauling dirt, sand, soil, or other loose materials shall be covered or have at least 0.6 meter (two feet) of freeboard (vertical space between the top of the load and top of the trailer) maintained in accordance with the requirements of California Vehicle Code Section 23114.

Adherence to the dust suppression requirements included in Rule 403, which are incorporated by reference in Section 01065 of Metropolitan's construction contractor specifications, would minimize the creation of fugitive dust and the associated potential to expose sensitive receptors to localized fugitive dust emissions. Therefore, Project construction would not expose sensitive receptors to substantial concentrations of fugitive dust emissions, and impacts would be **less than significant**.

Mitigation Measure: None required

Significance Determination: Less than significant

Toxic Air Contaminants

Construction of the proposed Project would result in temporary increases in local TAC emissions as a result of DPM generated by heavy-duty construction equipment and heavy, diesel-fueled truck trips for transport of demolition debris and soil. Table 10 presents the maximum estimated total cancer and non-cancer risk for the maximum exposed residential receptor of the 468 receptors that were modeled.⁶ The cancer and chronic risks shown in Table 10 represent the maximum risk at the location of the maximum exposed residential receptor for each individual Project component as well as the maximum combined risk for all activities at the overall maximum exposed residential receptor. As shown in Table 10, the cancer risk from Project construction activities at nearby residential and school receptors (i.e., the additional individual cancer risk created by Project construction activities above the existing background cancer risk) would exceed the SCAQMD threshold of 10 excess cancer cases in one million people. In addition, the maximum chronic hazard index (i.e., the potential for non-cancer health effects to occur as a result of exposure to TACs) would exceed the SCAQMD threshold of 1.⁷

Table 11 Estimated Cancer and Non-Cancer Health Risk at Maximum Exposed Residential Receptor During Construction

Project Component	Cancer Risk (per million)¹	Chronic Risk Hazard Quotient²
Phases 1 through 3 (Combined Exposure of a Child from 3rd Trimester Fetus to Age 9)		
Reservoir Cover and Liner	2.36	0.01
I/O Tower	10.6	0.12
Junction Structure	28.16	0.57
Facility Electrical Upgrades	20.16	0.39
Standby Generator	16.96	0.30
Surge Tank Telemetry	0.17	0.03
Administration Building and Water Quality Lab	8.10	0.25
Miscellaneous Site Upgrades	2.34	0.07
Pump Station	1.12	0.07
Cumulative Risk ³	75.92	1.44
Risk Criteria	10 per million	1.0
Exceed Criteria?	Yes	Yes
Phase 3 Only (Exposure of a Child from 3rd Trimester Fetus to Age 2)		
Pump Station	6.54	0.07
Risk Criteria	10 per million	1.0
Exceed Criteria?	No	No

⁶ As noted in Appendix B, school land uses were modeled as residential receptors in addition to residences, which represents a conservative analysis because exposure would be highest at residential receptors due to the extended duration of time people are present at their residences as compared to schools.

⁷ The health risk analysis incorporates reasonable, worst-case assumptions related to construction timing, breathing rates, and age of exposed persons. As such, actual health risk exposure for individual persons may be lower than estimated herein based on actual construction timing and the age of exposed persons.

Project Component	Cancer Risk (per million) ¹	Chronic Risk Hazard Quotient ²
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¹ The maximum exposed residential receptor is a single-family residence located at 1400 South Orange Avenue southeast of the intersection of Tegner Drive and South Orange Avenue in Monterey Park.

The cancer risk sum for construction activities is based on intermittent exposure over a period of nine years. Age groups exposed conservatively include 3rd trimester, 0 to 2 years, and 2 to 16 years. The cancer risk values shown represent the maximum risk to which a receptor in that age group could be exposed during Project construction activities.

² The chronic risk hazard quotient is a unitless value that is based on the highest annual concentration, and it is not dependent on age sensitivity factors or age groups.

³ Cancer and chronic risks associated with construction of each Project component would vary at any given individual receptor based on their distance from the Project component. For each Project component, cancer and chronic risks are reported for the maximum exposed residential receptor for that component. However, construction activities would be dispersed throughout the approximately 142-acre Project site at varying distances from any given individual receptor. Therefore, the estimated maximum cancer and chronic risks for each Project component are not added together because no single individual receptor would be exposed to the maximum risks from all Project components. Instead, the cumulative cancer and chronic risks represent the highest combined risk from all Project construction activities experienced by the overall maximum exposed residential receptor.

Source: Appendix B

Cancer burden resulting from Project construction activities within the zone of impact (i.e., the Project-related increase in the population-wide occurrence of cancer cases) would be approximately 0.28 excess cancer cases, which would not exceed the SCAQMD threshold of 0.5.

Because Project construction activities would result in an incremental excess cancer risk and chronic hazard risk in exceedance of SCAQMD thresholds, Project construction would expose sensitive receptors to substantial TAC concentrations. Therefore, without mitigation, the proposed Project would result in a **significant** impact related to exposure to substantial TAC concentrations. Implementation of MM AQ-1 (detailed in Section 3.1.5.3, *Mitigation Measure*), which involves the use of off-road diesel-fueled construction equipment greater than 25 horsepower that are compliant with federally mandated clean diesel engine emissions standards (USEPA Tier 4) as well as certain electrically powered equipment, would be required. Further information on how this measure would reduce impacts to less than significant can be found in Section 3.1.5.3, *Mitigation Measure*.

Applicable Mitigation Measure: MM AQ-1

Significance Determination: Less than significant with mitigation incorporated

Localized Operational Emissions

As discussed under Threshold AQ-B, operations and maintenance activities at Garvey Reservoir would remain the same as existing conditions and would result in no net change in criteria air pollutant emissions once construction activities are completed. The proposed Project includes replacement of the existing standby generator with a new standby generator. Standby generators produce localized criteria air pollutant and TAC emissions such as DPM during routine testing and emergency operation. Monthly testing of the standby generator would be conducted at the same frequency as the existing generator and would therefore not result in a net increase in TAC emissions. Pursuant to SCAQMD rules and regulations, including SCAQMD Rule 1401 (New Source Review of Toxic Air Contaminants), Metropolitan would be required to obtain a permit from SCAQMD for the standby generator, which would ensure the generator is constructed and operated in accordance with applicable SCAQMD rules and regulations. Additionally, the new generator would replace an existing, less efficient generator. Therefore, Project operation would not expose sensitive receptors to substantial pollutant concentrations, and **no impact** would occur.

Applicable Mitigation Measure: None required

Significance Determination: No impact

Threshold AQ-D: *Would the proposed Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

The Project would generate oil and diesel fuel odors during construction from equipment use as well as odors related to asphalt paving. The odors would be limited to the construction period and would be intermittent and temporary. Furthermore, these odors would dissipate rapidly with distance from in-use construction equipment. The proposed Project does not include components with the potential to generate other emissions, such as those leading to odors, during operation. Therefore, Project operation would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people, and impacts would be **less than significant**.

Applicable Mitigation Measure: None required

Significance Determination: Less than significant

3.1.5.2 Cumulative Analysis

Cumulative impacts consider impacts at the Project site together with similar impacts of existing development and reasonably anticipated projects in the Project site vicinity. The general approach to cumulative impact analysis used in this Draft EIR is discussed in Section 3, *Environmental Impact Analysis and Mitigation Measures*, and cumulative projects are listed in Table 5 of that section. The geographic scope for analyzing cumulative air quality impacts is the SCAB. The SCAB is designated a nonattainment area for ozone, PM₁₀, and PM_{2.5}. The SCAB is in attainment of all other NAAQS and CAAQS (Appendix B). Therefore, because the SCAB is designated nonattainment for ozone and particulate matter, cumulative air quality impacts related to particulate matter and ozone are potentially **significant**. The immediate region around the Project site has an estimated carcinogenic risk of 549 in a million, which is higher than the basin-wide average of 424 in a million (Appendix B; SCAQMD 2018). Therefore, cumulative air quality impacts related to TACs are also potentially **significant**.

Construction

In accordance with CEQA Guidelines Section 15064(h)(3), SCAQMD's approach for assessing cumulative impacts related to criteria air pollutants is based on the AQMP forecasts of attainment of ambient air quality standards in accordance with the requirements of the federal and California Clean Air Acts. If a project's mass regional emissions or localized emissions do not exceed the applicable SCAQMD thresholds, then the project's criteria pollutant emissions would not be cumulatively considerable. Project construction would generate emissions of ozone precursors VOC and NO_x as well as particulate matter and would therefore contribute to the SCAB's existing nonattainment status for ozone and particulate matter. As described under Thresholds AQ-B and AQ-C, Project emissions of criteria air pollutants during construction would exceed the regional SCAQMD threshold for ozone precursor NO_x and the SCAQMD LST for PM₁₀ during Phase 1 if all Project components are under construction on the same day. Therefore, the proposed Project's contribution to cumulative air quality impacts from regional ozone (for which NO_x is a precursor) and particulate matter concentrations would be **cumulatively considerable (significant)**, and implementation of MM AQ-1 (detailed in Section 3.1.5.3, *Mitigation Measure*) would be required. Further information on how MM AQ-1 would reduce the proposed Project's contribution to cumulative air quality impacts from regional ozone and particulate matter concentrations can be found in Section 3.1.5.3, *Mitigation Measure*.

As discussed under Threshold AQ-C, TAC emissions generated by Project construction activities would exceed SCAQMD thresholds, which are designed to evaluate whether a project's incremental contribution to existing background cancer risk, cancer burden, and non-cancer chronic risk would be cumulatively considerable. Therefore, the proposed Project's contribution to cumulative air quality

impacts related to TACs would be **cumulatively considerable (significant)**, and implementation of MM AQ-1 (detailed in Section 3.1.5.3, *Mitigation Measure*) would be required. Further information on how MM AQ-1 would reduce the proposed Project's contribution to cumulative air quality impacts from TACs can be found in Section 3.1.5.3, *Mitigation Measure*.

Although some cumulative projects in the surrounding area may be under construction at the same time as the proposed Project, the majority of these projects are not located within 0.25 mile of the Project site, meaning that construction of these projects would not generate localized fugitive dust emissions or odorous emissions that would impact the same sensitive receptors as those affected by Project construction. As with the proposed Project, construction activities for cumulative projects would be required to comply with SCAQMD Rule 403 to minimize localized fugitive dust generation and Rule 402 to minimize nuisance emissions. Therefore, cumulative construction-phase impacts related to localized fugitive dust emissions and odorous emissions would be **less than significant**.

Applicable Mitigation Measure: MM AQ-1

Cumulative Significance Determination: Cumulative impacts related to regional ozone and particulate matter concentrations as well as localized TAC concentrations would be significant, but the proposed Project's contribution during construction would **not be cumulatively considerable (less than significant) with mitigation incorporated**. Cumulative impacts related to localized fugitive dust emissions and odorous emissions would be **less than significant**.

Operation

In accordance with CEQA Guidelines Section 15064(h)(3), SCAQMD's approach for assessing cumulative impacts related to criteria air pollutants is based on the AQMP forecasts of attainment of ambient air quality standards in accordance with the requirements of the federal and California Clean Air Acts. If a project's mass regional emissions or localized emissions do not exceed the applicable SCAQMD thresholds, then the project's criteria pollutant emissions would not be cumulatively considerable. Operations and maintenance activities at Garvey Reservoir would remain the same as existing conditions and would result in no net change in criteria air pollutant emissions once construction activities are completed. Therefore, the proposed Project's contribution to cumulative air quality impacts related to criteria air pollutants from operation would **not be cumulatively considerable (less than significant)**.

Project operation would not result in new sources of TAC emissions. Therefore, the proposed Project's contribution to cumulative air quality impacts related to TACs during operation would **not be cumulatively considerable (less than significant)**.

Similar to the proposed Project, cumulative projects in the vicinity of the Project site do not involve dust- or odor-generating land uses. Therefore, **no cumulative operational impact** related to fugitive dust or odorous emissions would occur.

Applicable Mitigation Measure: None required

Cumulative Significance Determination: Cumulative impacts related to regional ozone and particulate matter concentrations as well as localized TAC concentrations would be significant, but the proposed Project's contribution during operation would **not be cumulatively considerable (less than significant)**. **No cumulative impact** related to fugitive dust or odorous emissions would occur.

3.1.5.3 Mitigation Measure

Mitigation Measure AQ-1 Construction Equipment Emissions Reduction Measures

AQ-1. During Project construction activities, the Project Contractor(s) shall implement the

following NO_x reduction measures:

- All off-road diesel-fueled construction equipment greater than 25 horsepower shall be compliant with federally mandated clean diesel engine emissions standards (USEPA Tier 4) or should be alternatively-fueled (e.g., electric); and
- Welders, pressure washers, and portable generators shall be electrically-powered, or electricity shall be pulled from the grid in lieu of using generators.

Implementation of MM AQ-1 would result in a reduction in regional construction-related NO_x emissions as well as localized PM₁₀ and TAC emissions during Project construction. Table 12 and Table 13 show the anticipated reduction in regional and localized construction-related emissions during Phase 1 with implementation of MM AQ-1.⁸ In addition, Table 14 shows the anticipated reduction in cancer and chronic risk during construction with implementation of MM AQ-1.

As shown in Table 12, Table 13, and Table 14, implementation of MM AQ-1 would reduce regional construction-related NO_x emissions, localized PM₁₀ emissions, and cancer and chronic risk below the applicable SCAQMD thresholds such that impacts would be **less than significant with mitigation incorporated**.

Table 12 Proposed Project Regional Construction Emissions with Implementation of MM AQ-1

Year	Maximum Mitigated Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Phase 1 (2025-2027)						
Reservoir Cover and Liner	<1	4	12	<1	11	2
I/O Tower	2	13	60	<1	2	1
Facility Electrical Upgrades	1	5	17	<1	1	<1
Standby Generator	1	5	17	<1	1	<1
Surge Tank Telemetry	<1	5	19	<1	1	<1
Administration Building and Water Quality Lab	<1	5	19	<1	<1	<1
Miscellaneous Site Upgrades	<1	4	18	<1	2	1
Maximum Total Daily Construction Emissions – Phase 1	5	42	162	<1	19	4
SCAQMD Regional Thresholds	75	100	550	150	150	55
Threshold Exceeded?	No	No	No	No	No	No

VOC = volatile organic compounds; NO_x = nitrogen oxide; CO = carbon monoxide; SO_x = sulfur oxide; PM₁₀ = particulate matter with a diameter no more than 10 microns; PM_{2.5} = particulate matter with a diameter no more than 2.5 microns
 Source: Appendix B

⁸ Mitigated regional and localized criteria air pollutant emissions for Phases 2 and 3 are not provided because unmitigated construction-related emissions during these phases would be below SCAQMD thresholds.

Table 13 Estimated Maximum Localized Criteria Air Pollutant Emissions During Construction with Implementation of MM AQ-1

Phase	Maximum On-site Emissions (lbs/day)			
	NO _x /NO ₂	CO	PM ₁₀	PM _{2.5}
Sitewide (Phase 1)				
Reservoir Cover and Liner	1	9	5	<1
I/O Tower	12	56	<1	<1
Facility Electrical Upgrades	5	15	<1	<1
Standby Generator		15	<1	<1
Surge Tank Telemetry	4	16	<1	<1
Administration Building and Water Quality Lab	5	17	<1	<1
Miscellaneous Site Upgrades	4	17	2	1
Total Maximum Daily On-site Emissions – Sitewide	31	145	7	1
Applicable SCAQMD LST (5-Acre Work Site, 25 Meters to Nearest Sensitive Receptor)	183	1,814	14	9
Threshold Exceeded?	No	No	No	No

NO_x/NO₂ = nitrogen oxides; CO = carbon monoxide; PM₁₀ = particulate matter 10 micrometers in diameter or less; PM_{2.5} = particulate matter 2.5 micrometers in diameter or less; SCAQMD = South Coast Air Quality Management District; LST = Localized Significance Threshold

Note: Some numbers may not add up precisely due to rounding considerations.

Source: Appendix B

Table 14 Estimated Cancer and Non-cancer Health Risk at Maximum Exposed Residential Receptor During Construction with Implementation of MM AQ-1¹

Project Component	Cancer Risk (per million) ¹	Chronic Risk Hazard Quotient ²
Phases 1 through 3 (Combined Exposure of a Child from 3rd Trimester Fetus to Age 9)		
Reservoir Cover and Liner	1.09	0.01
I/O Tower	0.43	<0.01
Junction Structure	2.76	0.05
Facility Electrical Upgrades	1.33	0.02
Standby Generator	1.13	0.02
Surge Tank Telemetry	0.02	<0.01
Administration Building and Water Quality Lab	1.32	0.02
Miscellaneous Site Upgrades	0.23	0.01
Pump Station	0.15	0.01
Cumulative Risk	6.59	0.11
Risk Criteria	10 per million	1.0
Exceed Criteria?	No	No
Phase 3 Only (Exposure of a Child from 3rd Trimester Fetus to Age 2)		
Pump Station	0.77	0.01
Risk Criteria	10 per million	1.0
Exceed Criteria?	No	No

Project Component	Cancer Risk (per million) ¹	Chronic Risk Hazard Quotient ²
<p>¹ The maximum exposed residential receptor is a single-family residence located at 1400 South Orange Avenue, southeast of the intersection of Tegner Drive and South Orange Avenue in Monterey Park.</p> <p>The cancer risk sum for construction activities is based on intermittent exposure over a period of nine years. Age groups exposed conservatively include 3rd trimester, 0 to 2 years, and 2 to 16 years. The cancer risk values shown represent the maximum risk to which a receptor in that age group could be exposed during Project construction activities.</p> <p>² The chronic risk hazard quotient is a unitless value that is based on the highest annual concentration, and it is not dependent on age sensitivity factors or age groups.</p> <p>Source: Appendix B</p>		

As noted in Section 3.1.5.2, *Cumulative Analysis*, if a project’s mass regional emissions do not exceed the applicable SCAQMD thresholds, then the project’s criteria pollutant emissions would not be cumulatively considerable. Implementation of MM AQ-1 would reduce the proposed Project’s regional NO_x emissions, localized PM₁₀ emissions, and cancer and chronic risk during construction to below the SCAQMD thresholds of significance. Therefore, because mitigated emissions and cancer/chronic risk would not exceed the applicable SCAQMD thresholds, which are set at the levels at which an individual project’s contribution to cumulative air quality impacts would not be cumulatively considerable, the proposed Project’s contribution to cumulative air quality impacts related to ozone, PM₁₀, and TACs would **not be cumulatively considerable (less than significant with mitigation incorporated)**.

Significance Determination: Less than significant with mitigation incorporated

3.2 Greenhouse Gas Emissions

3.2.1 Introduction

This section describes the existing conditions, regulatory framework, and potential impacts related to greenhouse gas (GHG) emissions and global climate change that would result from the proposed Project. The analysis of GHG emissions is based primarily on the Air Quality and Greenhouse Gas Emissions Study prepared by Rincon Consultants, Inc. in April 2024. The Air Quality and Greenhouse Gas Study is provided as Appendix B to the Draft EIR.

3.2.2 Existing Conditions

Climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period. Climate change is the result of numerous, cumulative sources of GHG emissions contributing to the "greenhouse effect," a natural occurrence that takes place in Earth's atmosphere and helps regulate the temperature of the planet. GHG emissions occur both naturally and as a result of human activities, such as fossil fuel burning, decomposition of landfill wastes, raising livestock, deforestation, and some agricultural practices. GHGs produced by human activities include the following (USEPA 2024):

- **Carbon Dioxide (CO₂).** Carbon dioxide is the primary form in which carbon exists in the atmosphere and is produced primarily by fossil fuel combustion, forest clearing, biomass burning, and some non-energy production processes, such as cement production.
- **Methane.** Methane is a hydrocarbon that is a primary component of natural gas. Methane emissions are generated by the anaerobic decomposition of organic matter in biological systems and are generated mainly by agricultural activities (e.g., rice cultivation, enteric fermentation in animals, decomposition of animal wastes), decomposition of municipal solid wastes, wastewater treatment, production and distribution of natural gas and petroleum, incomplete fossil fuel combustion, and coal mining.
- **Nitrous Oxide.** Nitrous oxide is a compound released primarily by agricultural soils (due to the application of fertilizers, manure deposition, and production of nitrogen-fixing crops), fossil fuel combustion, wastewater treatment, waste incineration, and biomass burning.
- **Hydrofluorocarbons.** Hydrofluorocarbons are primarily used as replacements for ozone-depleting substances in refrigeration, air conditioning, insulating foams, and aerosol propellants and are emitted through wear, faulty maintenance, and/or leakage over the lifetime of these products.
- **Perfluorocarbons and Sulfur Hexafluoride.** Perfluorocarbons and sulfur hexafluoride are emitted primarily by industrial processes such as aluminum smelting, semiconductor manufacturing, electric power transmission and distribution, and magnesium casting.

Different types of GHGs have varying global warming potentials. The global warming potential of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO₂) is used to relate the amount of heat absorbed to the amount of the gas emitted, referred to as

“carbon dioxide equivalent” (CO₂e), which is the amount of GHG emitted multiplied by its global warming potential. Carbon dioxide has a 100-year global warming potential of one. By contrast, methane has a global warming potential of 30, meaning its global warming effect is 30 times greater than CO₂ on a molecule per molecule basis (Intergovernmental Panel on Climate Change [IPCC] 2021).⁹

Anthropogenic activities since the beginning of the industrial revolution (approximately 250 years ago) are adding to the natural greenhouse effect by increasing the concentration of GHGs in the atmosphere that trap heat. Since the late 1700s, estimated concentrations of CO₂, methane, and nitrous oxide in the atmosphere have increased by over 43 percent, 156 percent, and 17 percent, respectively, primarily due to human activity (USEPA 2023). Emissions resulting from human activities are thereby contributing to an average increase in Earth’s temperature. Potential climate change impacts in California may include loss of snowpack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years (State of California 2018). For additional background information and context on GHG emissions and climate change, refer to Appendix B of the Draft EIR.

3.2.3 Regulatory Framework

This section describes the plans, policies, and regulations related to GHG emissions that are applicable to the proposed Project. A more detailed discussion of the regulatory framework pertaining to GHG emissions is provided in Appendix B of the Draft EIR.

3.2.3.1 Federal

Federal Clean Air Act

The federal Clean Air Act does not specifically regulate GHG emissions; however, the United States Supreme Court (*Massachusetts v. U.S. Environmental Protection Agency, et al.*, 549 U.S. 497 – 2007) determined that GHGs are pollutants that can be regulated under the federal Clean Air Act. Currently, there are no federal regulations that set ambient standards for GHGs.

3.2.3.2 State

Legislation and Executive Orders

California continues to lead the global effort of mitigating and adapting to climate change through progressive legislative and executive direction. Such actions have established a series of increasingly stringent GHG emissions reduction goals and targets intended to help reduce and reverse the effects of global climate change. These goals and targets include the following:

- **Senate Bill (SB) 32.** SB 32 serves as an update to the emissions reduction target codified under AB 32. Signed into law in 2016, SB 32 establishes a statewide emissions reduction target of 40 percent below 1990 levels by 2030.
- **Executive Order B-55-18.** On September 10, 2018, the governor issued Executive Order (EO) B-55-18, which established a new statewide goal of achieving carbon neutrality by 2045 and maintaining net negative emissions thereafter.

⁹ The IPCC’s (2021) *Sixth Assessment Report* determined that methane has a global warming potential (GWP) of 30. However, the 2022 Climate Change Scoping Plan published by the California Air Resources Board uses a GWP of 25 for methane, consistent with the IPCC’s (2007) *Fourth Assessment Report*. Therefore, this analysis utilizes a GWP of 25.

- **Assembly Bill 1279.** Signed into law in 2022, AB 1279 declares the policy of the State is both to achieve net zero GHG emissions as soon as possible, but no later than 2045, and maintain net negative GHG emissions thereafter and to ensure that by 2045, statewide anthropogenic GHG emissions are reduced to at least 85 percent below the 1990 levels.

CARB 2022 Scoping Plan

On December 15, 2022, CARB adopted the 2022 Scoping Plan. The 2022 Scoping Plan sets a target of reducing emissions to 85 percent below 1990 levels by 2045 and outlines a technologically feasible, cost-effective, and equity-focused path to achieve carbon neutrality by 2045. As with previous scoping plans, the 2022 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends local governments implement climate strategies consistent with the 2022 Scoping Plan Appendix D: Local Actions (CARB 2022). The 2022 Scoping Plan also assesses the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan.

CEQA Guidelines Requirements for Analysis and Reduction of GHG Emissions

CEQA Guidelines Section 15064.4(a) indicates public agencies should make a careful judgement in determining the significance of GHG emissions under CEQA. Public agencies shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. A public agency shall have discretion to determine, in the context of a particular project, whether to quantify GHG emissions resulting from the project and/or rely on a qualitative analysis or performance-based standards.

Additionally, CEQA Guidelines Section 15064.4(b) states public agencies should focus GHG analysis on the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change when determining the significance of a project's GHG emissions. A project's incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national, or global emissions. A public agency's analysis should consider a timeframe that is appropriate for the project and also must reasonably reflect evolving scientific knowledge and state regulatory schemes.

CEQA Guidelines Section 15183.5(b) states public agencies may choose to analyze and mitigate significant GHG emissions in a plan for the reduction of GHG emissions or similar document, and such a plan may be used in a cumulative impacts analysis of GHG emissions. Pursuant to CEQA Guidelines 15183.5(b)(1), the plan for the reduction of GHG emissions should:

- Quantify GHG emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;
- Establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable;
- Identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area;
- Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;
- Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels; and
- Be adopted in a public process following environmental review.

Consistent with CEQA Guidelines Sections 15064(h)(3) and 15130(d), CEQA Guidelines Section 15183.5(b)(2) states a plan for the reduction of GHG emissions, once adopted following certification of an EIR or adoption of an environmental document, may be used for later projects in the cumulative impacts analysis for GHG emissions. An environmental document that relies on a GHG reduction plan for a cumulative impacts analysis must identify those requirements specified in the plan that apply to the project, and, if those requirements are not otherwise binding and enforceable, incorporate those requirements as mitigation measures applicable to the project. If there is substantial evidence that the effects of a particular project may be cumulatively considerable, notwithstanding the project's compliance with the specified requirements in the GHG emissions reduction plan, an EIR must be prepared for the project.

3.2.3.3 Local

South Coast Air Quality Management District

As indicated in Section 3.1, *Air Quality*, the proposed Project is located within the jurisdiction of the SCAQMD. In December 2008, SCAQMD adopted a bright-line threshold of 10,000 MT of CO₂ per year for industrial facilities with respect to projects where SCAQMD is the lead agency (SCAQMD 2008). However, SCAQMD's bright-line threshold is not applicable to the proposed Project because SCAQMD is not the lead agency for the project under CEQA. In addition, Metropolitan has adopted a qualified Climate Action Plan (CAP) that enables streamlining of GHG emissions analyses pursuant to CEQA Guidelines Section 15183.5(b)(2), as discussed further in the following subsection.

The Metropolitan Water District of Southern California Climate Action Plan

In May 2022, Metropolitan adopted a CAP and certified the associated Program EIR. The CAP sets targets for reducing GHG emissions from Metropolitan's operations, including the conveyance, storage, treatment, and delivery of water to its 26 member water agencies. The CAP informs policy and planning decisions and establishes a feasible and implementable way to reach its emissions reduction target. As outlined in Section 1.1 of Metropolitan's CAP, the CAP meets all the required elements of a qualified GHG emissions reduction plan and is in compliance with CEQA Guidelines Section 15183.5(b)(1) (described previously in Section 3.2.3.2, *State*, of this EIR).

Metropolitan used an emissions inventory and forecast to provide a basis for establishing targets for future GHG reductions. Metropolitan established a 2030 target of 40 percent below 1990 levels by 2030 for GHG emissions reduction to achieve consistency with SB 32 and a 2045 target of carbon neutrality consistent with the recently signed AB 1279, which codifies the State's goal of achieving carbon neutrality by 2045 that was initially set forth in EO B-55-18. Metropolitan is tracking its GHG emissions annually using a carbon budget approach. The carbon budget is analogous to a tank with a set capacity, or a total mass emission cap, between the emissions level in 2005 and carbon neutrality in 2045. All the emissions from Metropolitan's operations go into this tank each year. The total capacity of the tank is Metropolitan's total emissions budget, and over time that tank fills up. As long as Metropolitan produces fewer GHG emissions than can fit in the tank, the identified targets will be achieved regardless of emissions produced during any particular year. Metropolitan's total carbon budget was calculated in Section 4.3 of the CAP and is based on the total emissions that can be generated between 2005 and 2045 while still achieving Metropolitan's 2030 and 2045 GHG emissions reduction targets (Metropolitan 2022). Additionally, Metropolitan is committed to preparing annual CAP progress reports to track GHG emissions against the carbon budget as well as a CAP update every five years to achieve carbon neutrality by 2045.

The CAP includes a suite of 42 GHG emissions reduction measures that would reduce Metropolitan's GHG emissions and achieve carbon neutrality while also providing improved infrastructure

reliability, increased energy resiliency, and decreased costs associated with energy procurement and maintenance. GHG reduction measures included in the CAP include phasing out natural combustion, converting to a zero-emissions vehicle fleet, using alternative low-carbon intensity fuels, utilizing low-carbon and carbon-free electricity, improving energy efficiency, increasing waste diversion, and increasing water conservation and local water supplies (Metropolitan 2022).

3.2.4 Thresholds and Methodology

3.2.4.1 Thresholds of Significance

Table 15 lists the thresholds from Appendix G of the CEQA Guidelines that pertain to GHG emissions, which are addressed in the Draft EIR.

Table 15 CEQA Thresholds for GHG Emissions

Threshold Would the proposed 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?

3.2.4.2 Methodology

The analysis of the impacts of the proposed Project on GHG emissions is based on the Air Quality and Greenhouse Gas Emissions Study prepared by Rincon Consultants, Inc. in April 2024 (Appendix B). The report presents a detailed discussion of the methodology used in evaluating impacts of the proposed Project, including quantification of Project emissions using CalEEMod version 2022.1.1.21.

3.2.5 Impacts Analysis

3.2.5.1 Project Analysis

Threshold GHG-A: *Would the proposed Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

As outlined in Section 1.1 of Metropolitan’s CAP, the CAP meets the requirements of CEQA Guidelines Section 15183.5(b)(1) for a qualified GHG emissions reduction plan (Metropolitan 2022). As a result, pursuant to CEQA Guidelines Section 15064.4, 15183.5(a), and 15183.5(b), Metropolitan can streamline the CEQA review of its projects using the GHG emissions analysis completed for the CAP if the proposed Project is consistent with the adopted CAP. Therefore, this analysis relies on the streamlining provisions of CEQA Guidelines Section 15183.5 to determine whether the Project would generate GHG emissions that may have a significant impact on the environment by evaluating whether the Project would be consistent with the CAP. The Project would be consistent with the CAP if the Project’s emissions are within Metropolitan’s carbon budget and the Project incorporates all applicable reduction measures from the CAP.

Construction Emissions

Construction of the proposed Project would result in temporary increases in GHG emissions as a result of the use of heavy-duty construction equipment and vehicle trips generated by construction workers and the transport of construction materials, demolition debris, and soil. Estimated GHG emissions generated during Project construction are shown in Table 16. As shown therein, total GHG emissions during Project construction would be highest during the replacement of the reservoir cover and liner and the completion of seismic upgrades to the I/O tower. In total, Project construction would generate approximately 3,932 MT of CO₂e, or approximately 131 MT of CO₂e per year, when amortized over a 30-year period pursuant to SCAQMD guidance.

Table 16 Estimated GHG Emissions – Project Construction

Project Component	Emissions (MT of CO ₂ e per year)
Reservoir Cover and Liner	1,054
I/O Tower	1,044
Junction Structure	337
Facility Electrical Upgrades	300
Standby Generator	394
Surge Tank Telemetry	97
Administration Building and Water Quality Lab	304
Miscellaneous Site Upgrades	241
Pump Station	161
Total Construction Emissions	3,932
Annual Construction Emissions (amortized over 30 years)	131

MT = metric tons; CO₂e = carbon dioxide equivalents

¹ SCAQMD recommends amortizing construction emissions over the lifetime of a project, typically defined as 30 years, and adding the amortized construction emissions to operational emissions to estimate annual emissions

Source: Appendix B

Combined Construction and Operational Emissions

Operations and maintenance activities (e.g., frequency of staff visits, standby generator testing, water usage in Administration Building/Water Quality Laboratory) would remain the same as existing conditions under the proposed Project after completion of construction. Therefore, the only source of net new GHG emissions associated with the proposed Project is the anticipated increase in electricity consumption due to installation of the proposed pump station. Estimated GHG emissions generated during Project operation are shown in Table 17. To obtain an estimate of total annual GHG emissions associated with the proposed Project, annual operational emissions were added to amortized construction emissions pursuant to SCAQMD guidance. As shown in Table 17, the proposed Project would generate approximately 240 MT of CO₂e per year in total.

Table 17 Estimated GHG Emissions – Project Operation with Amortized Construction Emissions

Emission Sources	GHG Emissions (MT of CO ₂ e per year)
Energy Consumption	109
Total Operational Emissions	109
Amortized Construction Emissions ¹	131
Total Emissions (Annual Construction [amortized] + Annual Operational)	240

MT = metric tons; CO₂e = carbon dioxide equivalents

¹ See Table 16. SCAQMD recommends amortization of construction emissions over the lifetime of a project, typically defined as 30 years, and adding the amortized construction emissions to operational emissions to estimate yearly emissions. Operational emissions are not amortized because these emissions are already estimated on a yearly basis

Source: Appendix B

The proposed Project includes sustainability features that would reduce GHG emissions below the conservative GHG emissions estimate provided in Table 17. These design features include, but are not limited to, installing LED lighting in the fixtures along the access bridge to the I/O tower and upgrading the water heater, HVAC system, and other fixtures/appliances in the Administration Building and Water Quality Laboratory to be more energy- and water-efficient.

Summary of Impacts

As noted previously, Metropolitan adopted a CAP to address and mitigate district-wide GHG emissions associated with construction and operational activities. Metropolitan’s annual 2023 CAP Progress Report states approximately 9,252,380 MT of CO₂e remains in the carbon budget for 2023-2045 years (Metropolitan 2023). The proposed Project would generate a total of approximately 5,022 MT of CO₂e, including 3,932 MT of CO₂e from Project construction (Table 16) and 1,090 MT of CO₂e from Project operation from 2035 (year of pump station installation) through 2045,¹⁰ which is within the remaining quantified carbon budget as of 2022. Pursuant to the annual CAP GHG emissions inventory and reporting procedures, GHG emissions generated by proposed Project activities are tracked as part of Metropolitan’s overall carbon budget through data collected from construction contractors, utility and service providers (electricity, natural gas, water, wastewater, and solid waste), and the employee commute survey. In addition, organization-wide CAP measures are being implemented to reduce Metropolitan’s GHG emissions over time such that GHG emissions remain within the carbon budget.

As mentioned previously, the CAP includes a suite of measures to reduce GHG emissions. These measures include conducting studies, enacting administrative policies and programs, upgrading fleet vehicles and deploying alternative fuel technologies, installing battery energy storage systems at specific treatment plants, increasing energy efficiency at pumping plants, incentivizing employees’ use of low carbon transportation options, increasing waste diversion, promoting water use efficiency among Metropolitan’s customers, and evaluating carbon sequestration opportunities. The majority of reduction measures are intended to be enacted at an organizational level and are not broadly applicable to individual Metropolitan projects. However, the CAP has two measures specifically aimed toward projects associated with buildings and facilities. CAP Measure DC-2 involves reducing natural gas emissions through electrification of buildings and equipment (50 percent by 2030 and 100 percent by 2045), and CAP Measure EE-1 involves converting interior and exterior lighting to LED technologies (50 percent by 2030 and 100 percent by 2045). The water heater and HVAC equipment in the Administration Building and Water Quality Laboratory are currently powered by electricity, and the upgraded water heater and HVAC equipment would also be all-electric, consistent with CAP

¹⁰ 109 MT of CO₂e per year for electricity consumption (Table 17) * 10 years

Measure DC-2. In addition, the proposed Project would also incorporate CAP Measure EE-1 by installing exterior LED lighting in the lighting fixtures along the I/O tower access bridge and interior LED lighting in the Administration Building and Water Quality Laboratory. As a result, the proposed Project would not conflict with GHG emissions reduction measures listed in the CAP.

In summary, the proposed Project's GHG emissions are within Metropolitan's carbon budget, and the proposed Project incorporates all applicable CAP reduction measures. Therefore, pursuant to CEQA Guidelines Section 15064.4 and 15183.5, the proposed Project would not directly or indirectly generate GHG emissions that may have a significant impact on the environment, and impacts would be **less than significant**.

Applicable Mitigation Measure: None required

Significance Determination: Less than Significant

Threshold GHG-B: *Would the proposed Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Applicable plans, policies, and regulations consist of Metropolitan's CAP, SB 32, EO B-55-18, the 2022 Scoping Plan, and AB 1279. As discussed under threshold GHG-1, the proposed Project would be consistent with Metropolitan's CAP because 1) estimated GHG emissions generated by proposed Project activities are within Metropolitan's carbon budget and would be tracked as part of Metropolitan's overall carbon budget with organization-wide CAP measures implemented to reduce Metropolitan's GHG emissions over time such that GHG emissions remain within the carbon budget; and 2) the proposed Project would incorporate applicable CAP reduction measures. Also, by being consistent with the CAP, the proposed Project would be consistent with state GHG emission reduction plans, policies, and regulations, such as the 2022 Scoping Plan, SB 32, EO B-55-18, and AB 1279 because the GHG emission reduction targets established by these plans, laws, and policies are incorporated into and consistent with Metropolitan's GHG emissions reduction targets. Therefore, the proposed Project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing GHG emissions, and **no impact** would occur.

Applicable Mitigation Measure: None required

Significance Determination: No Impact

3.2.5.2 Cumulative Analysis

The geographic scope of cumulative impacts related to GHG emissions and climate change is global because impacts of climate change are experienced on a global scale regardless of the location of GHG emission sources. Therefore, GHG emissions and climate change are, by definition, cumulative impacts. As discussed in Section 3.2.2, *Existing Conditions*, the adverse environmental impacts of cumulative GHG emissions, including sea level rise, increased average temperatures, more drought years, and more large forest fires, are already occurring. As a result, cumulative impacts related to GHG emissions are **significant**. Thus, the issue of GHG emissions and climate change involves an analysis of whether a project's contribution towards an impact is cumulatively considerable.

The determination of whether a project would result in a cumulatively considerable impact related to GHG emissions and climate change is based on the project's compliance with state targets established by SB 32 and EO B-55-18 to reduce GHG emissions to 40 percent below 1990 levels by 2030 and to net zero by 2045, respectively. As discussed under GHG-A and GHG-B, the proposed Project would be consistent with Metropolitan's CAP, and by being consistent with the CAP, the proposed Project would also be consistent with state GHG emission reduction targets established by SB 32 and EO B-

55-18 because these state-level targets are incorporated into Metropolitan's GHG emissions reduction target. As a result, the proposed Project's contribution to cumulative GHG emissions impacts would **not be cumulatively considerable (less than significant).**

Applicable Mitigation Measure: None required

Cumulative Significance Determination: Cumulative impacts related to GHG emissions would be significant, but the proposed Project's contribution would **not be cumulatively considerable (less than significant).**

3.3 Noise

3.3.1 Introduction

This section describes the existing conditions, regulatory framework, and potential noise impacts that would result from the proposed Project, including substantial temporary and permanent increases in ambient noise levels and generation of excessive groundborne vibration/noise. This analysis of noise impacts is based primarily on the Noise Technical Study prepared for the proposed Project by Rincon Consultants, Inc. in March 2024 (Appendix C).

3.3.2 Existing Conditions

The following sections provide an overview of environmental noise and groundborne vibration as well as sensitive receivers and the existing noise environment in the proposed Project site vicinity. A detailed discussion of each of these topics is provided in Appendix C.

3.3.2.1 Environmental Noise

Sound is a vibratory disturbance created by a moving or vibrating source, which is capable of being detected by the hearing organs (e.g., the human ear). Noise is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment (California Department of Transportation [Caltrans] 2013).

Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as a doubling of traffic volume, would increase the noise level by 3 dB; similarly, dividing the energy in half would result in a decrease of 3 dB (Caltrans 2013). Human perception of noise has no simple correlation with sound energy: the perception of sound is not linear in terms of dBA or in terms of sound energy. Two sources of equivalent noise level do not “sound twice as loud” as one source. It is widely accepted that the average healthy ear can barely perceive an increase (or decrease) of up to 3 dBA in noise levels (i.e., twice [or half] the sound energy); that a change of 5 dBA is readily perceptible (8 times the sound energy); and that an increase (or decrease) of 10 dBA sounds twice (or half) as loud (10.5 times the sound energy) (Caltrans 2013).

Sound changes in both level and frequency spectrum as it travels from the source to the receiver. The most obvious change is the decrease in sound level as the distance from the source increases. Noise levels may also be reduced by intervening structures; the amount of attenuation provided by this “shielding” depends on the size of the object and the frequencies of the noise levels. Natural terrain features, such as hills and dense woods, and man-made features, such as buildings and walls, can significantly alter noise levels.

One of the most frequently used noise metrics is the equivalent noise level (L_{eq}); it considers both duration and sound power level. L_{eq} is defined as the single steady A-weighted level equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time. Normal

conversational levels are in the 60 to 65 dBA L_{eq} range; ambient noise levels greater than 65 dBA L_{eq} can interrupt conversations (Federal Transit Administration [FTA] 2018).

3.3.2.2 Groundborne Vibration

Groundborne vibration consists of oscillatory waves that move from a source through the ground to adjacent structures. Vibration energy spreads out as it travels through the ground, causing the vibration level to diminish with distance away from the source (Caltrans 2020). Typically, groundborne vibration generated by human activities attenuates rapidly with distance from the source of the vibration. While people have varying sensitivities to vibrations at different frequencies, in general they are most sensitive to low-frequency vibration. Vibration in buildings, such as from nearby construction activities, may cause windows, items on shelves, and pictures on walls to rattle. Building vibration components can also take the form of an audible low-frequency rumbling noise, referred to as groundborne noise. Groundborne noise is usually only a problem when the originating vibration spectrum is dominated by frequencies in the upper end of the range (60 to 200 Hertz), or when foundations or utilities, such as sewer and water pipes, physically connect the structure and the vibration source (FTA 2018). Although groundborne vibration is sometimes noticeable in outdoor environments, it is almost never perceived as annoying to people who are outdoors (FTA 2018). The primary concern from vibration is that it can be intrusive and annoying to building occupants and vibration-sensitive land uses.

Vibration amplitudes are usually expressed in peak particle velocity (PPV) inches per second (in/sec). PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is often used in monitoring of blasting vibration because it is related to the stresses that are experienced by buildings (Caltrans 2020).

3.3.2.3 Sensitive Receivers

Noise- and vibration-sensitive land uses are locations where people reside or where the presence of unwanted sound and vibration could adversely affect the use of the land. Residences, schools, hospitals, guest lodging, libraries, and some passive recreation areas would all be considered noise and vibration-sensitive and may warrant unique measures for protection from intruding noise (Metropolitan 2023). Historic buildings are also typically considered vibration sensitive due to the nature of past construction techniques.

The Project site is surrounded by sensitive receivers with residential neighborhoods to the west, north, south, and east and Hillcrest Elementary School to the east.

3.3.2.4 Existing Noise Environment

The existing noise environment at and near the Project site is comprised primarily of vehicle traffic, including trucks, buses, and autos traveling on local roadways. Motor vehicle noise is characterized by a high number of individual events that can create a sustained noise level in proximity to noise-sensitive uses. Roadways with the highest traffic volumes and speeds produce the highest noise levels. In the Project area, the main thoroughfare road and primary source of vehicular traffic noise is South Orange Avenue. Heavy trucks can generate vibrations depending on vehicle type, weight, and pavement conditions. Because heavy trucks typically operate on major streets, existing vibration levels in the Project site vicinity are largely related to periodic heavy truck traffic on South Orange Avenue. Secondary noise sources include Garvey Reservoir operations and nearby residential and school activities.

To characterize the existing noise environment around the Project site, ambient noise measurements were taken on January 16, 2024 at six different locations near Garvey Reservoir. A detailed discussion of the methodology used and raw data for the noise measurements is provided in Appendix C. Existing ambient noise levels are shown in Table 18, and the locations of the measurement locations are shown in Figure 4. As shown in Table 18, existing ambient sound levels range between approximately 54 to 63 dBA L_{eq} .

Table 18 Existing Ambient Noise Levels in Project Site Vicinity

Noise Monitoring ID	Measurement Location	Sample Times	Approximate Distance to Primary Noise Source	dBA L_{eq}	dBA L_{max}
NM-1	Garvey Ranch Park	10:35 – 10:50 a.m.	700 feet to South Orange Avenue	54	62
NM-2	Eastern side of South Orange Avenue next to Hillcrest Elementary School	11:04 – 11:19 a.m.	50 feet to centerline of South Orange Avenue	60	73
NM-3	Cul-de-sac of Adams Way (northern terminus)	11:31 – 11:46 a.m.	35 feet to centerline of Adams Way	56	64
NM-4	Eastern side of Fulton Avenue, north of Keller Street	11:54 a.m. – 12:09 p.m.	30 feet to centerline of Fulton Avenue	56	72
NM-5	Eastern side of Kempton Avenue between McComb Way and Wilcox Avenue	12:59 – 1:14 p.m.	30 feet to centerline of Kempton Avenue	63	83
NM-6	Southern terminus of Russell Avenue	12:37 – 12:52 p.m.	30 feet to centerline of Russell Avenue	62	71

dBA = A-weighted decibel; L_{eq} = average noise level equivalent; L_{max} = maximum instantaneous noise level
Source: Appendix C

Figure 4 Noise Measurement Locations



3.3.3 Regulatory Framework

This section describes the plans, policies, and regulations related to noise that are applicable to the proposed Project.

3.3.3.1 Federal

There are no federal noise standards that directly regulate environmental noise relevant to the proposed Project. The FTA's 2018 *Transit Noise and Vibration Impact Assessment* guidance document was used to evaluate construction noise and vibration levels resulting from Project construction activities as they relate to structural damage. The guidance provides reasonable criteria for assessing construction noise impacts based on the potential for adverse community reaction, which are presented in Table 19.

Table 19 FTA's Daytime Construction Noise Criteria

Receiving Land Use	Noise Criterion (dBA Leq [8-hour])
Residential	80
Commercial	85
Industrial	90

dBA = A-weighted decibel; Leq = average noise level equivalent
Source: FTA 2018

Table 20 summarizes the vibration criteria recommended by the FTA for evaluating the potential for architectural damage to buildings.

Table 20 FTA's Groundborne Vibration Criteria – Architectural Damage

Building Category	PPV (in/sec)
I. Reinforced-concrete, steel, or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12

PPV = peak particle velocity; in/sec = inches per second
Source: FTA 2018

3.3.3.2 State

There are no state regulations that directly regulate environmental noise relevant to the proposed Project. Caltrans' 2020 *Transportation and Construction Vibration Guidance Manual* guidance document was used to evaluate construction vibration levels relative to human annoyance resulting from Project construction activities. The vibration standards pertaining to human annoyance based on this guidance are presented in Table 21.

Table 21 Vibration Annoyance Potential Criteria

Human Response	Vibration Level (in/sec PPV)	
	Transient Sources	Continuous/Frequent Intermittent Sources ¹
Severe	2.0	0.4
Strongly perceptible	0.9	0.10
Distinctly perceptible	0.25	0.04
Barely perceptible	0.04	0.01

in/sec = inches per second; PPV = peak particle velocity
¹ Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.
 Source: Caltrans 2020

3.3.3.3 Local

City of Monterey Park

City of Monterey Park General Plan

The Project site is within Monterey Park and is subject to the policies and requirements of the City’s General Plan Safety Element, which is implemented through the MPMC. The Safety Element of the City’s General Plan includes several noise control programs designed to protect citizens from the adverse effects of uncontrolled noise by controlling noise at its source (City of Monterey Park 2022).

Monterey Park Municipal Code

MPMC Chapter 4.50, *Regulation of Noise and Other Disturbances*, contains the City’s Noise Ordinance. MPMC Section 4.50.040 states it is unlawful for any person to allow, maintain, or cause any noise disturbance. MPMC Section 4.50.050 provides exemptions to compliance with the provision of the Noise Ordinance, indicating certain activities are not considered "noise disturbances" such as 1) public works projects performed by public agencies, or their contractors, that cannot be performed from 7:00 a.m. to 6:00 p.m. Monday through Friday and 2) the use of emergency generators during a power outage or other emergency.

MPMC Sections 4.50.070 and 4.50.080 indicate any source of sound exceeding the noise level limits shown in Table 22, as measured at receiving properties, constitutes a prohibited noise disturbance.

Table 22 Monterey Park Noise Level Limits

Land Use	Time Period	Sound Level (dBA)
Residential	Nighttime (10:00 p.m. to 7:00 a.m.)	50
	Daytime (7:00 a.m. to 10:00 p.m.)	55
Neighborhood Commercial ¹	Anytime	60
Other Commercial	Anytime	65
Industrial	Anytime	70

dBA = A-weighted decibel
¹ “Neighborhood Commercial” is not defined in MPMC Chapter 4.50, but MPMC Section 21.10.020 defines the “Neighborhood Shopping” zone as providing for commercial areas intended to serve nearby residential neighborhoods.
 Notes:
 If the ambient noise level cannot be sufficiently determined, then the above presumed noise levels will serve as the default ambient noise level.
 If the property where the noise is received is located on the boundary between two different land uses, the lower noise level will apply.
 Source: MPMC Section 4.50.080

MPMC Section 4.50.100 provides exceptions to the limits in Table 22, indicating certain activities are not subject to these limits but must comply with other special conditions. The list of exceptions includes construction activities conducted between 7:00 a.m. and 6:00 p.m. Monday through Friday, and between 9:00 a.m. and 6:00 p.m. on Saturdays, Sundays, and holidays. “Construction activities” are defined by MPMC Section 4.50.020 as the grading, demolition, alteration, repair or remodeling of existing structures and construction of new structures including the use of power equipment in connection with such activities. (Construction activities do not include radios or other forms of amplified music on a construction site.) A temporary noise permit must be obtained from the City for construction activities lasting longer than three days.

3.3.4 Thresholds and Methodology

3.3.4.1 Thresholds of Significance

Table 23 lists thresholds from Appendix G of the CEQA Guidelines that pertain to impacts associated with noise, which are addressed in the Draft EIR. It was determined in the NOP/Initial Study (Appendix A) that implementation of the proposed Project would have no impact related to potential exposure of people residing or working within the Project area to excessive noise levels related to airports. Therefore, no further analysis of threshold (c) is included in the Draft EIR.

Table 23 CEQA Thresholds for Noise

Threshold
Would the proposed Project:
a. Generate 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. Generate 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, expose people residing or working in the project area to excessive noise levels?

The following sections indicate the significance criteria relied upon to make the determinations in Table 23 for thresholds (a) and (b).

Temporary or Permanent Increase in Ambient Noise Levels

On-Site Construction Activities

Neither Metropolitan nor the City has adopted thresholds for evaluating the significance of construction noise impacts. Therefore, this analysis utilizes the FTA criteria for assessing construction noise impacts. The proposed Project would generate a substantial temporary increase in ambient noise levels if construction noise levels would exceed the FTA daytime criteria shown in Table 19 in Section 3.3.3.1, *Federal*. Based on these criteria, the proposed Project would have the potential to result in a significant construction noise impact if:

- Noise generated by construction activities exceeds 80 dBA L_{eq} over an 8-hour period at residential land uses;
- Noise generated by construction activities exceeds 85 dBA L_{eq} over an 8-hour period at commercial land uses; and/or

- Noise generated by construction activities exceeds 90 dBA L_{eq} over an 8-hour period at industrial land uses.

On-Site Operational Activities

Metropolitan has not adopted thresholds for evaluating the significance of on-site operational noise impacts. Therefore, this analysis utilizes the noise limits established by the MPMC, as shown in Table 22 in Section 3.3.3.3, *Local*. The proposed Project would have the potential to result in a significant impact related to operational noise if Project operation would cause operational noise levels to exceed the following thresholds:

- Residential properties: 55 dBA L_{eq} from 7:00 a.m. to 10:00 p.m. or 50 dBA L_{eq} from 10:00 p.m. to 7:00 a.m.
- Neighborhood commercial properties: 60 dBA L_{eq} at any time
- Other commercial properties: 65 dBA L_{eq} at any time
- Industrial properties: 70 dBA L_{eq} at any time

Off-Site Roadway Noise

Metropolitan has not adopted thresholds of significance for evaluating roadway noise impacts. As discussed in Section 3.3.2.1, *Environmental Noise*, audible increases in general community noise levels typically refer to a change of 3 dBA or more because this level has been found to be the threshold of perceptibility in exterior environments. Changes in noise levels between 1 and 3 dBA are “potentially audible,” and changes of less than 1 dBA in noise levels are typically “inaudible” to the human ear except under quiet conditions in controlled environments (Caltrans 2013). Only “audible” changes in noise levels at sensitive receiver locations (i.e., 3 dBA or more) are considered potentially significant. Therefore, this analysis utilizes a threshold of a 3-dBA increase to evaluate potential Project impacts related to a substantial increase in roadway noise levels. A doubling of traffic flows (e.g., an increase from 500 vehicles per day along a roadway to 1,000 vehicles per day) is needed to create a 3 dBA increase in traffic-generated noise levels.

Vibration

Neither Metropolitan nor the City has adopted construction vibration standards. Therefore, for the purposes of this analysis, the vibration criteria recommended by the FTA for evaluating the potential for architectural damage to buildings and for vibration annoyance, listed respectively in Table 20 and Table 21 in Section 3.4.3, *Regulatory Framework*, are used to evaluate construction vibration impacts. Based on FTA guidance, the proposed Project would have the potential to result in a significant vibration impact if:

- Construction activities would generate vibration levels that exceed the FTA building damage threshold level of 0.2 in/sec PPV for non-engineered timber and masonry buildings.
- Construction activities would generate vibration levels that exceed the Caltrans “strongly perceptible” human annoyance criteria of 0.1 in/sec PPV.

3.3.4.2 Methodology

The analysis of proposed Project impacts to noise is based on the Noise Technical Study prepared by Rincon Consultants, Inc. in March 2024 (Appendix C). The report presents a detailed discussion of the methodology used in evaluating impacts of the proposed Project, including quantification of noise and vibration levels associated with Project construction and operation.

3.3.5 Impacts Analysis

3.3.5.1 Project Analysis

Threshold NOI-A: Would the proposed Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project site in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

On-Site Construction Noise

On-site Construction Noise – Daytime

On-site construction noise would result in a temporary increase in ambient noise levels at surrounding nearby receivers in the Project site vicinity. Construction noise would be generated by the use of heavy-duty construction equipment, which can be stationary or mobile. Stationary equipment operates in one location for hours or days in a constant mode (e.g., generators, compressors) or generates variable noise operations (e.g., jackhammers), producing constant noise for a period of time. Mobile equipment moves around the site and is characterized by variations in power and location, resulting in significant variations in noise levels over time.

During Project construction, the nearest off-site noise-sensitive receivers exposed to increased noise levels would be residential and school uses located in proximity to the Project site. Over the course of a construction day, the highest noise levels would be generated when multiple pieces of construction equipment are being operated concurrently. Construction noise levels associated with the proposed Project were calculated for a scenario in which all construction equipment was assumed to be operating simultaneously within a given construction phase and located at the construction area nearest to the affected receivers to present a conservative impact analysis. This is considered a conservative evaluation because the Project would typically use less overall equipment on a daily basis and, as such, would generate lower noise levels. In reality, the magnitude of construction noise impacts would vary throughout the entire construction period with the greatest impacts occurring when heavy construction equipment is operating near the Project site perimeter. In addition, estimated construction noise levels do not account for the presence of intervening structures or topography, which could reduce noise levels at the nearest sensitive receivers. Therefore, the evaluation of construction noise impacts is a conservative analysis.

Estimated construction noise levels at the nearest noise-sensitive receivers during the analyzed construction scenarios are shown in Table 24. As shown therein, construction noise levels at the nearest sensitive receivers (residences) would reach as high as approximately 78 dBA L_{eq} (8-hour), which would not exceed the FTA's residential daytime threshold of 80 dBA L_{eq} (8-hour). Construction noise levels at each receiver would vary through the duration of Project construction activities depending on the specific phase of construction in progress. In addition, MPMC Section 4.50.100 indicates construction activities conducted between 7:00 a.m. and 6:00 p.m. Monday through Friday, and between 9:00 a.m. and 6:00 p.m. on Saturdays, Sundays, and holidays are not subject to the City's noise level limits. Therefore, daytime Project construction activities would not generate a substantial temporary in ambient noise levels in the vicinity of the Project in excess of applicable standards, and impacts would be **less than significant**.

Table 24 Estimated Project Construction Noise Levels

Construction Phase	Distance to Nearest Sensitive Receiver (feet)	Noise Level (dBA L _{eq} 8-hour)	Threshold of Significance (dBA L _{eq} 8-hour)	Exceed Threshold ?
Phase 1 - I/O Tower Demolition	650	65	80	No
Phase 1 - Reservoir Cover Demolition	425	67	80	No
Phase 1/2 - Surge Tank Infrastructure Installation	500	65	80	No
Phase 2 - Junction Structure Infrastructure Installation	110	78	80	No
Phase 3 - Pump Station Infrastructure Installation	90	78	80	No

dBA = A-weighted decibel; L_{eq} = average noise level equivalent
 Source: Appendix C

Applicable Mitigation Measure: None required

Significance Determination: Less than significant

On-site Construction Noise – Nighttime

As detailed in Section 2, *Project Description*, occasional nighttime activities would be required for reservoir start-up (i.e., water quality testing and inspections), which occurs 24 hours a day as the reservoir fills up. However, these activities would not involve heavy-duty construction equipment. Furthermore, MPMC Section 4.50.050 exempts public works projects performed by public agencies, or their contractors, that cannot be performed from 7:00 a.m. to 6:00 p.m. Monday through Friday from compliance with the City’s Noise Ordinance. Therefore, nighttime Project construction activities would not generate a substantial temporary increase in ambient noise levels in the vicinity of the Project site in excess of applicable standards, and impacts would be **less than significant**.

Applicable Mitigation Measure: None required

Significance Determination: Less than significant

Off-Site Construction Traffic Noise

Project construction would generate temporary trips by workers, vendors, and haul trucks. The transport of workers and materials to and from the construction site would temporarily increase noise levels along roadways in the vicinity of the Project site. Peak daily construction traffic is anticipated to be approximately 20 trips, which is unlikely to result in a doubling of traffic volumes along South Orange Avenue that would result in a significant 3 dBA or greater increase because the roadway is a minor arterial roadway that provides access between local residential neighborhoods, SR-60 to the south, and commercial areas, and schools, and I-10 to the north (Appendix C). As a result, off-site construction-related traffic would not generate a substantial temporary increase in ambient noise levels at noise-sensitive receivers along the anticipated construction traffic routes in the vicinity of the Project site in excess of applicable standards, and impacts would be **less than significant**.

Applicable Mitigation Measure: None required

Significance Determination: Less than significant

On-Site Operational Noise

Operational noise sources associated with the proposed Project would include an HVAC unit, pump station pumps, and a standby generator that may be tested during daytime hours as part of routine maintenance activities. While the generator would only be tested on occasion, it was conservatively assumed to be in operation simultaneously with the HVAC unit and pump station pumps. Although the new standby generator and HVAC unit would replace existing on-site equipment, this analysis conservatively assumes these are new noise sources. In addition, no attenuation from intervening structures or topography was conservatively assumed.

Daytime noise levels from the generator, HVAC unit, and pump station pumps are shown in Table 25, and nighttime noise levels from the HVAC unit and pump station pumps are shown in Table 26. As shown in Table 25, daytime operational noise levels would range from approximately 28 to 42 dBA L_{eq} at the nearest sensitive receivers, which would not exceed the daytime threshold of 55 dBA L_{eq} . As shown in Table 26, nighttime operational noise levels would range from approximately 18 to 32 dBA L_{eq} at the nearest sensitive receivers, which would not exceed the nighttime threshold of 50 dBA L_{eq} . (Nighttime noise levels would be lower than daytime noise levels because the standby generator would not routinely be operated during nighttime hours.) Furthermore, operation of the standby generator during emergency circumstances, such as a power outage, would be exempt from compliance with the City's Noise Ordinance pursuant to MPMC Section 4.50.050. Therefore, operational-related on-site equipment would not generate a substantial permanent increase in ambient noise levels at noise-sensitive receivers in the vicinity of the Project site in excess of applicable standards, and impacts would be **less than significant**.

Applicable Mitigation Measure: None required

Significance Determination: Less than significant

Table 25 Daytime Operational Noise Levels

Receiver ¹	Generator		HVAC Unit		Pump Station		Combined Noise Level (dBA L _{eq})	Threshold	Exceeds Threshold?
	Distance to Receiver	dBA L _{eq}	Distance to Receiver	dBA L _{eq}	Distance to Receiver	dBA L _{eq}			
Single-family residences across South Orange Avenue	150 feet	41	150 feet	31	90 feet	24	42	55	No
Hillcrest Elementary School	500 feet	31	500 feet	21	180 feet	18	32	55	No
Single-family residences to the south	800 feet	27	800 feet	17	680 feet	6	28	55	No

dBA = A-weighted decibel; L_{eq} = average noise level equivalent; HVAC = heating, ventilation, and air conditioning unit

Source: Appendix C

Table 26 Nighttime Operational Noise Levels

Receiver ¹	HVAC Unit		Pump Station		Combined Noise Level (dBA L _{eq})	Threshold	Exceeds Threshold?
	Distance to Receiver	dBA L _{eq}	Distance to Receiver	dBA L _{eq}			
Single-family residences across South Orange Avenue	150 feet	31	90 feet	24	32	50	No
Single-family residences to the south	800 feet	17	680 feet	6	18	50	No

dBA = A-weighted decibel; L_{eq} = average noise level equivalent; HVAC = heating, ventilation, and air conditioning unit

¹ Hillcrest Elementary School is not considered in the nighttime operational noise analysis because the noise-sensitive activities associated with the school (e.g., classroom instruction) do not occur during nighttime hours (10:00 p.m. to 7:00 a.m.).

Source: Appendix C

Off-Site Operational Traffic Noise

Operations and maintenance activities at Garvey Reservoir, including the frequency of staff visits, would remain the same as existing conditions once Project construction activities are completed. Accordingly, Project operation would not result in a net increase in existing noise levels along local roadways. As such, off-site operational traffic noise would not generate a substantial permanent increase in ambient noise levels at noise-sensitive receivers in the vicinity of the Project site in excess of applicable standards, and **no impact** would occur.

Applicable Mitigation Measure: None required

Significance Determination: No impact

Threshold NOI-B: Would the proposed Project result in a generation of excessive groundborne vibration or groundborne noise levels?

Construction Vibration

Construction activities at the Project site have the potential to generate low levels of groundborne vibration because the operation of heavy equipment (e.g., backhoes, dozers, excavators, graders, loaders, haul trucks) generates vibrations that propagate through the ground and diminish in intensity with distance from the source. The greatest anticipated sources of vibration during Project construction activities during Phases 1 and 2 would be a vibratory roller and a bulldozer that would be used as close as 110 feet from the nearest residential building to the east. In addition, construction activities during Phase 3 would utilize equipment similar to a large bulldozer as close as 90 feet from the nearest residential building to the east.

Vibration levels at the nearest residence for a vibratory roller and other vibration-generating equipment are shown in Table 27. As shown therein, construction vibration levels would range from less than approximately 0.01 PPV in/sec to 0.04 PPV in/sec at the nearest structures, depending on the piece of equipment in use. These levels of vibration would not exceed the FTA’s vibration damage potential threshold for non-engineered timber and masonry building structures of 0.2 PPV in/sec or Caltrans’ strongly perceptible threshold of 0.10 PPV in/sec for human annoyance. Other construction equipment not included in the table would generate similar or lower vibration levels. Therefore, Project construction would not generate excessive groundborne vibration or ground-borne noise levels, and impacts would be **less than significant**.

Applicable Mitigation Measure: None required

Significance Determination: Less than significant

Table 27 Estimated Construction Vibration Levels

Equipment	Vibration Level at Nearest Residence (PPV in/sec)				Exceed Threshold?
	Phases 1 and 2 Construction (110 feet)	Phase 3 Construction (90 feet)	Architectural Damage Threshold (PPV in/sec)	Human Annoyance Threshold (PPV in/sec)	
Vibratory Roller	0.0412	--	0.2	0.1	No
Large Bulldozer	0.0174	0.0217	0.2	0.1	No
Loaded Trucks	0.0149	0.0186	0.2	0.1	No
Small Bulldozer	0.0006	0.0005	0.2	0.1	No

PPV = peak particle velocity; in/sec = inches per second

Source: Appendix C

Operation

The proposed Project does not include any substantial vibration sources associated with operation, such as railroad or subway lines. As a result, Project operation would not generate excessive groundborne vibration or groundborne noise levels, and **no impact** would occur.

Applicable Mitigation Measure: None required

Significance Determination: No impact

3.3.5.2 Cumulative Analysis

Cumulative impacts consider impacts at the Project site together with similar impacts of existing development and reasonably anticipated projects in accordance with the City's cumulative project list. The general approach to cumulative impact analysis used in this EIR is discussed in Section 3, *Environmental Impact Analysis and Mitigation Measures*, and cumulative projects are listed in Table 5 of this section. Noise and vibration are typically localized and rapidly attenuate within an urban environment; therefore, the geographic scope of cumulative noise and vibration impacts is limited to within 0.25 mile of the Project site.

Construction

Although some cumulative projects in the surrounding area may be under construction at the same time as the proposed Project, most of these projects are more than 0.25 mile from the Project site, meaning that noise and vibration from construction activities would not impact the same sensitive receivers and structures as those impacted by Project construction. One cumulative project is located within 0.25 mile of the Project site and consists of the City's SB1 Residential Street Rehabilitation project, which includes road improvements along Browning Place, located approximately 350 feet east of the Project site. However, this cumulative project is currently under construction and is relatively small-scale in nature, and construction of the proposed Project would not begin until September 2025. Therefore, it is likely that construction of the proposed Project would not overlap with construction of the SB1 Residential Street Rehabilitation project, and sensitive receivers in the vicinity of the Project site would not be exposed to a substantial increase in ambient noise levels. Therefore, cumulative impacts related to construction noise and vibration would be **less than significant**.

Applicable Mitigation Measure: None required

Cumulative Significance Determination: Cumulative impacts related to construction noise and vibration would be **less than significant**.

Operation

Existing development and cumulative projects in the surrounding area include similar operational noise sources as the proposed Project (e.g., HVAC equipment, vehicle trips). However, operational noise and vibration from these sources is localized and rapidly attenuates within an urbanized setting due to the effects of intervening structures that block line of sight and other noise sources. In addition, similar to the proposed Project, existing development and cumulative projects are required to comply with the City's General Plan and the provisions of the MPMC related to noise regulation. Furthermore, no significant operational vibration sources are located in the vicinity of the Project site with the potential to result in cumulative operational impacts. Therefore, cumulative operational noise and vibration impacts would be **less than significant**.

Applicable Mitigation Measure: None required

Cumulative Significance Determination: Cumulative impacts related to operational noise and vibration would be **less than significant**.

3.3.5.3 Mitigation Measures

No mitigation measures would be required because no significant impacts involving noise would occur. Furthermore, the Project Contractor(s) would be required to comply with Metropolitan's standard practices related to noise control as outlined in Section 01065 of the construction contractor specifications. These standard practices include keeping construction vehicle equipment in proper working order for the duration of the construction activities, equipping construction vehicles and equipment with mufflers in proper working order for the duration of the construction activities, locating noise-generating and stationary construction equipment as far as practicable from sensitive receivers, and orienting noise-generating equipment so that the source of noise is facing away from the sensitive receivers.

3.4 Transportation

3.4.1 Introduction

This section describes the existing conditions, regulatory framework, and potential impacts to transportation that would result from the proposed Project, including conflicts with programs, plans, ordinances or policies addressing the circulation system; substantial increases in vehicle miles traveled (VMT); introduction of traffic hazards; and inadequate emergency access. The analysis of transportation impacts is based in part on the Transportation Assessment prepared by Fehr & Peers in April 2024. This report is provided as Appendix D to the Draft EIR.

3.4.2 Existing Conditions

3.4.2.1 Existing Roadway Systems

Regional Roadways

The following freeway network provides regional access to the proposed Project site vicinity:

- **SR-60 (Pomona Freeway)** is an east-west highway that runs from U.S. Route 101 in the west, through Los Angeles, to Riverside. The portion of SR-60 in the Project site vicinity is approximately one mile to the south and has eight lanes.
- **I-10 (San Bernardino Freeway)** is a major east-west interstate highway that runs from Santa Monica through Los Angeles and San Bernardino to the Arizona border. The portion of I-10 in the Project site vicinity is approximately 1.4 miles to the north and has 12 lanes.

Local Roadways

The primary local roadway potentially affected by the proposed Project is South Orange Avenue, which borders the Project site to the east. South Orange Avenue is oriented in the north-south direction. There is one travel lane in each direction with a posted speed limit of 30 miles per hour. Sidewalks are consistently provided on both sides of South Orange Avenue and are generally in good condition. Crosswalk ability across South Orange Avenue is limited. A marked crosswalk is available at the South Orange Avenue/Pepper Street intersection, east of the Project site near Hillcrest Elementary School. There are no other marked opportunities to cross South Orange Avenue at the remaining intersections in the Project site vicinity.

3.4.2.2 Public Transportation

One public transportation route runs in the proposed Project site vicinity - the City's Spirit Route 3. This bus route provides public transportation throughout western Monterey Park, beginning at City Hall and ending at the intersection of Emerson Avenue and Rural Drive. The Monterey Park Spirit Route 3 traverses along Emerson Avenue, Alhambra Avenue, South Orange Avenue, Graves Avenue, Fulton Avenue, Ackley Street, Country Road, and Rural Drive (City of Monterey Park 2023). The

closest bus stops in the vicinity of the Project site are located at the South Orange Avenue/Metro Drive intersection and the South Orange Avenue/Pepper Street intersection.

3.4.3 Regulatory Framework

This section describes the plans, policies, and regulations related to transportation that are applicable to the proposed Project.

3.4.3.1 Federal

There are no federal regulations related to transportation that would be applicable to the proposed Project.

3.4.3.2 State

California Department of Transportation

Caltrans is responsible for the design, construction, maintenance, and operation of the California State Highway System as well as the portion of the Interstate Highway System within the state's boundaries. Caltrans is responsible for permitting and regulating the use of state freeways and highways. The regional freeways and highways in the Project site vicinity fall under the jurisdiction of Caltrans District 7 and include I-10 and SR-60.

Caltrans' construction practices require temporary traffic control planning in accordance with the California Manual on Uniform Traffic Control Devices during any time the normal function of a roadway is suspended (Caltrans 2023). In addition, Caltrans requires that permits be obtained for transportation of oversized loads and certain materials as well as for construction-related traffic disturbance. Caltrans regulations would apply to the transportation of oversized construction equipment and loads for the proposed Project.

Senate Bill 743

SB 743 was signed into law on September 27, 2013 and declares that “automobile delay, as described solely by level of service (LOS) or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment.” It further directed the Office of Planning and Research (OPR) to develop revisions to the CEQA Guidelines to establish new criteria for determining the significance of transportation impacts. SB 743 changed the approach to transportation impact analysis under CEQA by establishing measures such as VMT, VMT per capita, or automobile trip generation rates as the primary measures of transportation impacts and eliminates the previously-used measures of automobile delay, LOS, and other measures of traffic congestion as the basis for determining significant impacts under CEQA.

3.4.3.3 Local

City of Monterey Park

City of Monterey Park General Plan

The Project site is within Monterey Park and subject to the policies and requirements of the City's General Plan Circulation Element. The broad purpose of the Circulation Element is to define a safe, efficient, and adequate circulation system in Monterey Park that responds to all circulation needs. To

achieve this purpose, the Circulation Element includes goals and policies aimed at improving regional access, the local street system, public transportation, bicycle and pedestrian circulation, and parking. Of these, the one applicable policy would be Policy 2.8, which is to establish and maintain truck routes consistent with Figure C-3 of the City’s General Plan (City of Monterey Park 2001).

Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service Assessment

The City of Monterey Park’s *Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (2020) describe the transportation analysis requirements for land development, roadway projects, and specific plans in Monterey Park. The purpose of these guidelines is to provide guidance on how to prepare transportation studies in the city in conformance with applicable City and state regulations.

3.4.4 Thresholds and Methodology

3.4.4.1 Thresholds of Significance

Table 28 lists thresholds from Appendix G of the CEQA Guidelines that pertain to impacts associated with transportation, which are addressed in the Draft EIR.

Table 28 CEQA Thresholds for Transportation

Threshold
Would the proposed 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?

Metropolitan has not adopted specific thresholds to use in making the determinations in Table 28. Therefore, in support of making the determination for threshold (b), the VMT screening criteria outlined in the City of Monterey Park’s *Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (2020) were utilized (Appendix D).

3.4.4.2 Methodology

The analysis of proposed Project impacts to VMT is based on the Transportation Assessment prepared by Fehr & Peers in April 2024 (Appendix D). This report presents a detailed discussion of the methodology used in evaluating impacts of the proposed Project, including methodology related to trip generation estimates and VMT screening procedures.

3.4.5 Impacts Analysis

3.4.5.1 Project Analysis

Threshold TRA-A: Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

The two primary plans that address the circulation system in the Project site vicinity are SCAG's RTP/SCS and the City's General Plan. Each of these plans addresses various modes of transportation, including vehicles, bicycles, pedestrian, and transit and includes objectives and policies related to these modes of transportation. In light of these plans, the following subsections qualitatively evaluate Project impacts related to construction and operational traffic.

Construction

Construction of the proposed Project would temporarily contribute to traffic on regional and local roadways due to construction worker vehicle trips, delivery truck trips, and haul truck trips for demolition debris and soil movement. In particular, haul trucks may reduce roadway capacities (i.e., the ability of a road to accommodate traffic volumes) due to slower movements and larger turning radii of trucks compared to passenger vehicles. Planned receiving landfill sites for export of soil and demolition debris are the Waste Management Landfill in Azusa and the Puente Hills Materials Recovery Facility in the City of Industry. The haul route for the Waste Management Landfill would likely proceed north from the Project site toward I-10 via South Orange Avenue, Graves Avenue, and New Avenue, thus avoiding Hillcrest Elementary School located directly east of Garvey Reservoir across South Orange Avenue. The haul route for the Puente Hills Materials Recovery Facility would likely proceed south from the Project site to SR-60 via South Orange Avenue, Saturn Street, and Potrero Grande Drive. The routes would be the same for both the inbound and outbound directions.

Construction activities would typically occur Monday through Friday between the hours of 7:00 a.m. and 3:00 p.m., and limited work may occur on Saturdays, consistent with the City's permitted hours. Construction-related trips would primarily occur during off-peak hours in the early morning and mid-day time periods and would thus largely avoid contributing to afternoon peak period congestion. Table 29 and Table 30 summarize the anticipated trip volumes during Project construction. As shown therein, daily construction worker trips would be highest during Phase 1 with an average number of construction worker trips per day of 40 and a peak number of construction workers per day of 100. Haul trips would only occur during soil export and demolition debris removal activities and are represented as a peak trip estimate. During Phase 1, the Project would have a peak of 24 round-trip daily haul truck trips; during Phase 2, the Project would have a peak of 10 round-trip daily haul truck trips; and during Phase 3, the Project would have a peak of 4 round-trip daily haul truck trips. Delivery truck trips would occur more regularly and often on a daily basis during construction; therefore, delivery truck estimates are presented as a daily average through the duration of each phase. The project would have an average of four daily delivery truck trips during all construction phases.

Table 29 Estimated Daily Construction Worker Round-Trips by Phase¹

Activity		Phase 1	Phase 2	Phase 3
Reservoir Cover and Liner I/O Tower	Average	30	-	-
	Peak	76	-	-
Junction Structure	Average	-	20	-
	Peak	-	26	-
Facility Electrical System Standby Generator Surge Tank Telemetry Administration Building and Water Quality Laboratory Miscellaneous Site Upgrades	Average	10	-	-
	Peak	24	-	-
Pump Station	Average	-	-	6
	Peak	-	-	10
Maximum	Average	40	30	6
	Peak	100	50	10

¹ These estimates assume that each worker commutes in a single-occupancy vehicle and makes one round trip per day.
Source: Appendix D

Table 30 Estimated Daily Truck Round-Trips by Phase

Phase	Peak Soil Export/Demolition Debris Haul Truck Trips per Day	Average Delivery Truck Trips per Day
Phase 1	24 ¹	4
Phase 2	10 ²	4
Phase 3	4	4

¹ Based on assumption that peak soil export and demolition debris export activities take place simultaneously.

² Based on 45 two-way total Phase 2 haul trips for demolition debris.

Source: Appendix D

All three driveways at the Project site would be used for construction access, which would minimize the potential for construction trucks to queue along adjacent local roadways. In addition, the Project Contractor(s) would be required to comply with Metropolitan’s standard practices related to preparation and implementation of a Traffic Control Plan as outlined in Section 01065 of the construction contractor specifications. No lane or roadway closures would be required, and no public transit stops or routes would be affected during construction. The potential closure of the sidewalk along the southbound lane of South Orange Avenue during replacement of perimeter fencing would be temporary and short-term (approximately two weeks). Furthermore, Metropolitan and its Project Contractor(s) would be required to obtain applicable permits related to safe truck travel on Caltrans facilities (e.g., I-10, SR-60).

Policy 2.8 in the City’s General Plan Circulation Element requires the establishment and maintenance of truck routes consistent with the City’s approved truck routes map. Project haul routes would be designed to provide the most direct route from the Project site to the approved haul routes, including Potrero Grande Drive to the south and New Avenue to the northeast. Therefore, Project construction traffic would not conflict with a program, plan, ordinance or policy addressing the circulation system, such as the City’s General Plan. Impacts would be **less than significant**.

Applicable Mitigation Measure: None required

Significance Determination: Less than significant

Operation

Operations and maintenance activities at Garvey Reservoir, including the frequency of staff visits, would remain the same as existing conditions once Project construction is complete. As such, Project operation would result in no net change in vehicular trips. Therefore, Project operation would not conflict with a program, plan, ordinance or policy addressing the circulation system, such as the SCAG RTP/SCS or the City's General Plan, and **no impact** would occur.

Applicable Mitigation Measure: None required

Significance Determination: No impact

Threshold TRA-B: *Would the Project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?*

CEQA Guidelines Section 15064.3(b) identifies criteria for evaluating transportation impacts. Specifically, the guidelines state VMT exceeding an applicable threshold of significance may indicate a significant impact. According to CEQA Guidelines Section 15064.3(b), a lead agency has discretion to choose the most appropriate methodology to evaluate a project's VMT, and for many projects, a qualitative analysis of construction traffic may be appropriate.

Construction

Neither the Governor's Office of Planning and Research nor any jurisdiction in the local area requires an evaluation of VMT impacts during construction (Appendix D). Caltrans' *Transportation Analysis under CEQA, First Edition* guidance document indicates that a construction VMT analysis is typically only necessary for large projects or projects located a considerable distance from urbanized areas. The guidance also states that vehicle trips related to construction activities are temporary and the associated VMT is generally minor and limited to construction equipment and personnel with no long-term trip generation. The Project site is in an urbanized area, and the proposed Project would not involve large-scale construction activities that would have the potential to result in substantial increases in regional VMT because 1) construction workers and materials would be primarily sourced locally and 2) a relatively low volume of daily truck trips is anticipated. In addition, the Project would not require lane closures that could result in out-of-direction travel as travelers attempt to avoid the construction area. Therefore, based on the Caltrans guidance, the Project would not generate substantial VMT during construction (Appendix D).

The City of Monterey Park's *Transportation Study Guidelines for Vehicle Miles Traveled and Level of Service Assessment* do not specify guidelines for evaluating construction VMT impacts. The City's VMT Policy provides for screening out projects that are presumed to have a less than significant impact. These project types include "[c]ommunity institutions (e.g., public libraries, fire stations, local government)." While Caltrans guidance indicates the Project would not generate a significant VMT impact during construction, it would also be screened out of further VMT analysis under the City's policy because the project type is a public-serving community institution (Appendix D). Therefore, the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b), and impacts would be **less than significant**.

For informational purposes, construction-related VMT for the Project was quantified. Temporary construction worker commute trips are assumed to be generated from the local area or the greater Los Angeles County area. Haul truck trip distances were based on the locations of the two planned receiving landfill sites in City of Industry and Azusa. The distance traveled by each delivery truck would vary based on the type of equipment or material and its origin facility. VMT estimates were prepared for construction workers, soil export and demolition debris haul trucks, and material delivery trucks. Table 31 shows the estimated daily automobile/light-duty truck VMT for workers by

Project phase, and Table 32 provides the estimated total medium/heavy truck VMT for soil export and demolition debris. Table 33 shows the estimated daily delivery truck VMT per Project phase.

Table 31 Estimated Daily Automobile/Light-Duty Truck VMT – Construction Workers

Project Phase	Average Daily Number of Construction Workers	Home Based Work VMT Per Employee	Daily VMT
Phase 1	20	16.2 miles	324
Phase 2	15		243
Phase 3	3		49

Source: Appendix D

Table 32 Estimated Total Medium/Heavy Truck VMT – Soil Export & Demolition Debris

Project Phase	Number of Round-Trip Haul Trips	Puente Hills Materials Recovery Facility		Waste Management Azusa Land Reclamation	
		Round-Trip Distance	Total Estimated VMT	Round-Trip Distance	Total Estimated VMT
Phase 1 ¹	753	16.2 miles	12,199	31.4 miles	23,644
Phase 2 ²	45		729		1,413
Phase 3 ³	44		713		1,382

¹ Soil export (two-month period) and demolition debris (four-month period).

² Demolition debris (no time period available).

³ Soil export (one-month period).

Source: Appendix D

Table 33 Estimated Daily Delivery Truck VMT

Project Phase	Average Daily Number of Round-Trip Delivery Truck Trips	Round-Trip Distance	Daily VMT
Phase 1	2	50 miles	100
Phase 2	2		100
Phase 3	2		100

Source: Appendix D

Applicable Mitigation Measure: None required

Significance Determination: Less than significant

Operation

Operations and maintenance activities at Garvey Reservoir, including the frequency of staff visits, would remain the same as existing conditions once Project construction is complete. As such, Project operation would result in no net change in VMT. Therefore, Project operation would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b), and **no impact** would occur.

Applicable Mitigation Measure: None required

Significance Determination: No impact

Threshold TRA-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)?*

Construction

The proposed Project does not include roadway alterations or design features that could substantially increase hazards. However, Project construction would involve the addition of haul truck traffic within a primarily residential area, which has the potential to be an incompatible use that increases hazards on local roadways. As described above under TRA-A, planned receiving landfill sites for export of soil and demolition debris are the Waste Management Landfill in Azusa and the Puente Hills Materials Recovery Facility in the City of Industry. The haul route for the Waste Management Landfill would likely proceed north from the Project site toward I-10 via South Orange Avenue, Graves Avenue, and New Avenue, thus avoiding Hillcrest Elementary School located directly east of Garvey Reservoir across South Orange Avenue. The haul route for the Puente Hills Materials Recovery Facility would likely proceed south from the Project site to SR-60 via South Orange Avenue, Saturn Street, and Potrero Grande Drive. The routes would be the same for both the inbound and outbound directions. Construction-related trips would primarily occur during off-peak hours in the early morning and midday and would thus largely avoid contributing to afternoon peak period congestion. All three driveways at the Project site would be used for construction access, which would minimize the potential for construction trucks to queue along adjacent local roadways. In addition, the Project Contractor(s) would be required to comply with Metropolitan's standard practices related to preparation and implementation of a Traffic Control Plan as outlined in Section 01065 of the construction contractor specifications. Construction equipment and staging/laydown would occur within the boundaries of Garvey Reservoir, and no lane or roadway closures would be required. Therefore, Project construction would not substantially increase hazards on the local transportation network due to geometric design features or incompatible uses, and impacts would be **less than significant**.

Applicable Mitigation Measure: None required

Significance Determination: Less than significant

Operation

Operations and maintenance activities at Garvey Reservoir, including the frequency of staff visits, would remain the same as existing conditions, and the proposed Project does not include modifications to driveway or roadway configurations in the Project site vicinity. Therefore, Project operation would not substantially increase hazards due to a geometric design feature or incompatible uses, and **no impact** would occur.

Applicable Mitigation Measure: None required

Significance Determination: No impact

Threshold TRA-D: *Would the Project result in inadequate emergency access?*

Construction

Project construction activities would occur within the boundaries of the Garvey Reservoir facility and would not affect emergency access points at the facility or in the Project site vicinity. Construction vehicle traffic outside the Project site may slow traffic or hinder some circulation around the immediate vicinity of the Project site. However, impacts to local emergency access would be temporary and limited to the construction period. In addition, Metropolitan standard practices require

Project Contractor(s) to provide appropriate advance warning signage to alert motorists to the potential for cross construction vehicle traffic from the work limits in accordance with Caltrans standards as outlined in Section 01065 of the construction contractor specifications. Therefore, Project construction would not result in inadequate emergency access, and impacts would be **less than significant**.

Applicable Mitigation Measure: None required

Significance Determination: Less than significant

Operation

Upon the completion of Project construction, operations and maintenance activities and access points at Garvey Reservoir would remain the same as existing conditions. Therefore, Project operation would not result in inadequate emergency access, and **no impact** would occur.

Applicable Mitigation Measure: None required

Significance Determination: No impact

3.4.5.2 Cumulative Analysis

Cumulative impacts consider impacts at the Project site together with similar impacts of existing development and reasonably anticipated projects in the Project site vicinity. The general approach to cumulative impact analysis used in this Draft EIR is discussed in Section 3, *Environmental Impact Analysis and Mitigation Measures*, and cumulative projects are listed in Table 5 of this section. The geographic scope for analyzing cumulative transportation impacts is the local transportation network in the immediate vicinity of the Project site and VMT in the broader Southern California region.

Although some cumulative projects in the surrounding area may be under construction at the same time as the proposed Project, the majority of these projects are not located within 0.25 mile of the Project site such that construction of these projects would impact the same local roadways and intersections as those affected by Project construction. One cumulative project is located within 0.25 mile of the Project site and consists of the City's SB1 Residential Street Rehabilitation project, which includes road improvements along Browning Place, located approximately 350 feet east of the Project site. However, this cumulative project is currently under construction and is relatively small-scale in nature, and construction of the proposed Project would not begin until September 2025. Therefore, it is likely that construction of the proposed Project would not overlap with construction of the SB1 Residential Street Rehabilitation project, and impacts to the local transportation system would not be exacerbated through additional construction traffic from cumulative projects. Therefore, cumulative impacts related to construction traffic would be **less than significant**.

Buildout of cumulative development within and near the Project site vicinity, including the projects listed in Table 5 in Section 3, *Environmental Impact Analysis and Mitigation Measures*, would increase traffic volumes on local roadways as compared to existing conditions. The cumulative increase in traffic would have the potential to conflict with plans, programs, ordinances, and policies addressing the circulation system, and depending on the travel characteristics of each project, may substantially increase per-capita VMT. Therefore, cumulative operational traffic impacts would be **significant**. However, operations and maintenance activities at Garvey Reservoir, including the frequency of staff visits, would remain the same as existing conditions once Project construction is complete and would not contribute to cumulative VMT in the region. As a result, the proposed Project's contribution to significant cumulative operational transportation impacts would **not be cumulatively considerable (no impact)**.

The projects listed in Table 5 in Section 3, *Environmental Impact Analysis and Mitigation Measures*, are primarily residential and small commercial projects with low potential to substantially increase traffic hazards due to geometric design features or incompatible uses or to substantially impede emergency access. Furthermore, potential impacts to emergency access would primarily be temporary and limited to the cumulative projects' construction period. Therefore, cumulative impacts related to traffic hazards and emergency access would be **less than significant**.

Applicable Mitigation Measure: None required

Cumulative Significance Determination: Cumulative impacts related to conflicts with plans, programs, ordinances, and policies addressing the circulation system and VMT during construction would be **less than significant**. Cumulative impacts related to conflicts with plans, programs, ordinances, and policies addressing the circulation system and VMT during operation would be **significant**, but the proposed Project's contribution would **not be cumulatively considerable (no impact)**. Cumulative impacts related to traffic hazards and emergency access would be **less than significant**.

3.5 Tribal Cultural Resources

3.5.1 Introduction

This section describes the existing conditions and regulatory framework as they pertain to Tribal Cultural Resources (TCRs) and addresses the potential for implementation of the proposed Project to result in impacts to TCRs. This section includes a summary of the tribal consultation conducted by Metropolitan. Copies of communications from the tribal consultation process are provided as Appendix E.

PRC Sections 21074(a)(1) and (2) define TCRs as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe” that are either 1) included or determined to be eligible for inclusion in the California Register of Historical Places or included in a local register of historical resources or 2) a resource that is determined to be significant by a CEQA lead agency, in its discretion and supported by substantial evidence, including the significance of the resource to a California Native American tribe. Pursuant to PRC Section 21074(b), a cultural landscape that meets the criteria of PRC Section 21074(a) can also be a TCR to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. PRC Section 21074(c) also provides that a historical resource described in PRC Section 21084.1, a unique archaeological resource as defined in PRC Section 21083.2(g), or a “nonunique archaeological resource” as defined in Section PRC 21083.2(h) may also be a TCR if it conforms with the criteria of PRC Section 21074(a).

3.5.2 Existing Conditions

The proposed Project site is located within the traditional territories of numerous Native American tribal groups. Metropolitan received requests for formal notification pursuant to PRC Section 21080.3.1 from the following three California Native American tribes that are traditionally and culturally affiliated with the geographic area of the Project site:

- Gabrieleño Band of Mission Indians-Kizh Nation
- San Gabriel Band of Mission Indians
- Soboba Band of Luiseño Indians

3.5.3 Regulatory Framework

This section describes the plans, policies, and regulations related to TCRs that are applicable to the proposed Project.

3.5.3.1 Federal

No existing federal laws or regulations related to TCRs are applicable to the proposed Project.

3.5.3.2 State

California Public Resources Code Sections 21080.3.1 and 21080.3.2

PRC Section 21080.3.1(b-d) requires that, within 14 days of a lead agency determining an application for a project is complete or a decision by a public agency to undertake a project, the lead agency must provide formal notification to the designated contact, or a tribal representative, of California Native American tribes that are traditionally and culturally affiliated with the geographic area of the project (as defined in PRC Section 21073) and who have requested in writing to be informed by the lead agency of projects within their geographic area of concern. Tribes interested in consultation must respond in writing within 30 days from receipt of the lead agency's formal notification, and the lead agency must begin consultation within 30 days of receiving the tribe's request for consultation (PRC Section 21080.3.1(d-e)).

Pursuant to PRC Section 21080.3.2(b), consultation is considered concluded when either (1) the parties agree to measures to mitigate or avoid a significant effect, if a significant effect to a TCR exists or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.

California Public Resources Code Section 21082.3(c)

PRC Section 21082.3(c)(1) states that any information, including, but not limited to, the location, description, and use of a TCR, that is submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public without the prior consent of the tribe that provided the information. If the lead agency publishes any information submitted by a California Native American tribe during the consultation or environmental review process, that information shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.

Pursuant to PRC Section 21082.3(c)(2)(B), confidentiality does not apply to data or information that are or become publicly available, are already in lawful possession of the project applicant before the provision of the information by the California Native American tribe, are independently developed by the project applicant or the applicant's agents, or are lawfully obtained by the project applicant from a third party that is not the lead agency, a California Native American tribe, or another public agency.

3.5.4 Thresholds and Methodology

3.5.4.1 Thresholds of Significance

Table 34 lists thresholds from Appendix G of the CEQA Guidelines that pertain to impacts associated with TCRs. These thresholds are addressed in the Draft EIR.

Table 34 CEQA Thresholds for Tribal Cultural Resources

Threshold
Would the proposed Project:
<p>a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</p> <ol style="list-style-type: none"> 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

3.5.4.2 Methodology

The analysis in this section is based on the results of the tribal consultation process conducted by Metropolitan. Copies of communications from the tribal consultation process are provided as Appendix E.

Metropolitan initiated tribal cultural resource consultation on January 18, 2024, by mailing letters via certified mail to the following Native American tribes that have requested notification of Metropolitan projects in the geographic area in which they are traditionally and culturally affiliated:

- Gabrieleño Band of Mission Indians-Kizh Nation
- San Gabriel Band of Mission Indians
- Soboba Band of Luiseño Indians

Each letter included the proposed Project location, Project description, maps, and results of the California Historical Resources Information System search, Sacred Lands File search, and cultural resources field survey.¹¹ Furthermore, the letters stated tribal contacts had 30 days from receipt of the letter to request, in writing, consultation regarding the proposed Project. No tribal cultural resource consultation requests were received during the consultation period.

3.5.5 Impacts Analysis

3.5.5.1 Project Analysis

Threshold TCR-A(i): *Would the proposed 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 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)?*

¹¹ The results of the California Historical Resources Information System search, Sacred Lands File search, and cultural resources field survey can be found in the Cultural Resources Report, appended to the Initial Study included in Appendix A of this EIR.

Threshold TCR-A(ii): *Would the proposed 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 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?*

Metropolitan sent tribal cultural resource consultation request letters to three tribes in January 2024, pursuant to PRC 21080.3.1(b)(1). The tribal cultural resource correspondence record is summarized under Section 3.5.4.2, *Methodology*, and the letters sent are included as Appendix E.

No tribal cultural resources were identified during the tribal cultural resource consultation process because no tribes requested consultation with Metropolitan. Additionally, Metropolitan would implement its standard practices related to the protection of archaeological resources as outlined in Section 01065 of the construction contractor specifications (see Section 2.7, *Construction Characteristics*). Adherence to Metropolitan's standard practices in the unlikely event of unanticipated discovery of an archaeological resource, including an archaeological resource that could also be a TCR, would result in the protection of a resource should one be discovered. Therefore, the proposed Project would not cause a substantial adverse change in the significance of a TCR, and **no impact** would occur.

Significance: No Impact

3.5.5.2 Cumulative Analysis

Cumulative impacts consider impacts at the Project site together with similar impacts of existing development and reasonably anticipated projects in the Project site vicinity. The general approach to cumulative impact analysis used in this Draft EIR is discussed in Section 3, *Environmental Impact Analysis and Mitigation Measures*, and cumulative projects are listed in Table 5 of this section. The geographic scope of this resource area consists of Garvey Reservoir and the surrounding region.

Nearby past, present, and reasonably foreseeable probable future projects in the region as discussed in Section 3, *Environmental Impact Analysis and Mitigation Measures*, would have the potential to disturb areas with potential TCRs. Given the potential for cumulative development to result in substantial adverse changes in the significance of these potential TCRs, cumulative impacts to TCRs would be **significant**.

However, as described under TCR-A(i) and TCR-A(ii), no tribal cultural resources were identified during the tribal cultural resource consultation process because no tribes requested consultation with Metropolitan. In addition, the Project Contractor would be required to comply with Metropolitan standard practices related to the protection of archaeological resources as outlined in Section 01065 of the construction contractor specifications (see Section 2.6, *Construction Characteristics*). Adherence to Metropolitan's standard practices in the unlikely event of unanticipated discovery of an archaeological resource, including an archaeological resource that could also be a TCR, would result in the protection of a resource should one be discovered. Therefore, because no TCRs are located within the Project site, the proposed Project's contribution to this significant cumulative impact would **not be cumulatively considerable (no impact)**.

Applicable Mitigation Measure: None required

Cumulative Significance Determination: Cumulative impacts to tribal cultural resources would be **significant**, but the proposed Project's contribution would **not be cumulatively considerable (no impact)**.

3.5.5.3 Mitigation Measures

No mitigation measures would be required because no impacts to TCRs would occur. The Project Contractor would be required to comply with Metropolitan standard practices related to the protection of archaeological resources as outlined in Section 01065 of the construction contractor specifications in the event of an unanticipated discovery of archaeological resources, including those that may be considered TCRs by locally affiliated California Native Americans (see Section 2.6, *Construction Characteristics*).

4 Other Required CEQA Discussion

CEQA requires an EIR to evaluate a project’s foreseeable effects in relationship to other broader changes that may be occurring in the environment (CEQA Guidelines Section 15126; PRC Section 21002.1). Accordingly, this chapter includes a discussion of the other CEQA-mandated analyses, including the following:

- Section 4.1, Significant and Unavoidable Environmental Impacts (CEQA Guidelines Section 15126.2[c] [Significant Environmental Effects Which Cannot be Avoided if the Proposed Project is Implemented])
- Section 4.2, Significant and Irreversible Environmental Impacts (CEQA Guidelines Section 15126.2[d] [Significant Irreversible Environmental Changes Which Would be Caused by the Proposed Project Should it be Implemented])
- Section 4.3, Growth Inducement (CEQA Guidelines Section 15126.2[e] [Growth-Inducing Impact of the Proposed Project])

The requirements of CEQA Guidelines Section 15126.2(a) (Significant Environmental Effects) are addressed throughout Sections 3.1 to 3.5 of the Draft EIR, and the requirements of CEQA Guidelines Section 15126(b) (Energy Impacts) are addressed in Section 3.6 of the Initial Study, included as Appendix A. As such, no further discussion of these topics is included in this chapter.

4.1 Significant and Unavoidable Environmental Impacts

CEQA Guidelines Sections 15126(b) and 15126.2(c) require an EIR to describe any significant impacts that cannot be avoided if the proposed Project is implemented, the implications of any impacts that cannot be avoided, and reasons why the project is being proposed, despite these effects. As discussed in Section 3, *Environmental Impact Analysis and Mitigation Measures*, all impacts associated with the proposed Project would be reduced to a less-than-significant level. Therefore, no significant and unavoidable impacts would occur as a result of the implementation of the proposed Project.

4.2 Significant Irreversible Environmental Changes

Pursuant to CEQA Guidelines Section 15126.2(d), an EIR must consider any significant irreversible environmental changes that would be caused by the proposed Project. Specifically, CEQA Guidelines Section 15126.2(d) describes significant irreversible environmental changes as follows:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as a highway improvement

which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified (14 California Code of Regulations 15126.2[d]).

Implementation of the proposed Project would result in both short- and long-term commitments of natural resources. Construction and operation of the proposed Project would require the use and consumption of nonrenewable resources, such as steel and other metals. Renewable resources, such as lumber and other wood byproducts, would also be used. Unlike renewable resources, nonrenewable resources cannot be regenerated over time. Because the nature of the proposed Project primarily involves the rehabilitation and improvement of existing infrastructure and buildings, the requirement for building materials would be reduced when compared to other similar-sized projects involving all new construction. The quantity of building materials used during implementation of the proposed Project would not result in a significant impact because these types of resources are anticipated to be available in adequate supply into the foreseeable future.

Nonrenewable and renewable energy would be consumed during both construction and operation of the proposed Project as well as during the manufacturing and transportation of building materials. As discussed in the NOP/Initial Study (Appendix A), the proposed Project would not result in the wasteful, inefficient, or unnecessary consumption of energy during construction or operation. In addition, the proposed Project includes sustainability features to minimize energy and water consumption and GHG emissions. These design features include, but are not limited to, installing LED lighting in the fixtures along the access bridge to the I/O tower and upgrading the water heater, HVAC system, and other fixtures/appliances in the Administration Building and Water Quality Laboratory to be more energy- and water-efficient. However, the proposed Project would result in the irreversible commitment of energy resources in the form of diesel fuel, gasoline and electricity during construction and operation. Nevertheless, these types of resources are anticipated to be available in adequate supply into the foreseeable future. Therefore, the use of construction materials and nonrenewable resources for implementation of the proposed Project would not be unusual or extraordinary and would not negatively impact the availability of these resources. Therefore, impacts due to these irreversible commitments of environmental resources would be **less than significant**.

4.3 Growth Inducement

CEQA Guidelines Section 15126.2(e) requires a discussion of a proposed project's potential to foster economic or population growth, including ways in which a project could remove an obstacle to growth. Growth itself does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. Generally, a project may be considered growth-inducing if it results in one or more of the conditions identified below:

- Induces population growth;
- Induces economic expansion;
- Establishes a precedent-setting action (e.g., an innovation, a radical change in zoning or general plan designation);
- Results in development or encroachment in an isolated or adjacent area of open space (i.e., being distinct from "infill" development); or
- Removes an impediment to growth (e.g., the establishment of an essential public service or the provision of new access to an area).

A proposed project's growth-inducing potential is considered significant if project-induced growth could result in significant physical effects in one or more environmental resource areas. As discussed in the following subsections, the proposed Project would not induce population growth, induce economic expansion, establish a precedent-setting action, result in development or encroachment in an isolated or adjacent area of open space, or remove an impediment to growth. As such, the proposed Project would have no impact related to growth inducement.

4.3.1 Population Growth

As discussed in the NOP/Initial Study (Appendix A), implementation of the proposed Project would not involve the construction of residential development that would have the potential to directly foster population growth. Project construction activities would be temporary, intermittent, and not expected to create substantial additional employment opportunities beyond what is typically available to construction workers in the area. Operations and maintenance activities at Garvey Reservoir would remain similar to existing conditions once construction activities are completed and would not require additional Metropolitan employees. Consequently, the proposed Project would not directly result in population growth. In addition, the proposed Project does not include construction of new water supply facilities or expansion of the reservoir and therefore would not increase water supply to the region or otherwise indirectly induce population growth. Therefore, the proposed Project would not result in an increase in potable water supplies that could indirectly induce population growth in the region.

4.3.2 Economic Expansion

Implementation of the proposed Project would involve construction activities that would likely be performed by workers hired from the local region. Because construction workers would be expected to be drawn from the existing regional workforce, Project construction activities would not induce economic expansion from a temporary employment standpoint. In addition, as indicated in Section 4.3.1, *Population Growth*, operation and maintenance activities would not require additional Metropolitan employees and therefore would not induce substantial economic expansion in Los Angeles County. As a result, the proposed Project would not induce growth from an economic expansion standpoint.

4.3.3 Precedent-Setting Action

The proposed Project does not require any General Plan or zoning amendments, does not include the construction of new water supply facilities, and would not increase the capacity of Garvey Reservoir. Rather, the proposed Project involves upgrading existing infrastructure and enhancing/improving existing operations of Garvey Reservoir. As discussed above and in the NOP/Initial Study (Appendix A), the proposed Project would not result in population growth either directly or indirectly. As such, the proposed Project would not set a precedent that would result in new growth-inducing impacts in the area.

4.3.4 Development of Open Space/Vacant Land

Development of open space is considered growth-inducing when it occurs outside urban boundaries or in isolated locations instead of infill areas. The Project site is located in an urbanized, built-out area and is within the footprint of the existing Garvey Reservoir, and does not involve development of open space or vacant land in isolated areas that could induce growth at the periphery of developed areas. As such, the proposed Project would not involve development of open space or vacant land such that growth-inducing impacts would occur.

4.3.5 Removal of an Impediment to Growth

The proposed Project consists of improvements and upgrades to Metropolitan's existing Garvey Reservoir and does not include the construction of new water supply facilities or the expansion of treatment capacity at Garvey Reservoir. In addition, the proposed Project would not extend public roadways or other utilities to areas currently lacking these services. Accordingly, the proposed Project would not remove existing obstacles to growth within the Project site vicinity.

5 Alternatives

5.1 Introduction

CEQA requires alternatives that could avoid or lessen the project’s significant effect(s) be considered (CEQA Guidelines Section 15126.6). This chapter presents potential alternatives to the proposed Project and evaluates them as required by CEQA. According to the CEQA Guidelines, an EIR must describe a range of reasonable alternatives to a proposed project which would feasibly attain most of the basic project objectives and would avoid or substantially lessen any of a proposed project’s significant environmental effects. CEQA Guidelines Section 15126.6(f) provides direction on the required alternatives analysis:

The range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.

An EIR is not required to consider every conceivable alternative to a project. Rather, the alternatives must be limited to those which meet the project objectives, are feasible, and would avoid or substantially lessen at least one of the significant environmental effects of the project. Feasible refers to a project being capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors. CEQA Guidelines Section 15126.6(b) provides further clarify on the selection of alternatives for evaluation:

Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (PRC Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

CEQA Guidelines Section 15126.6(d) provides further guidance on the extent of evaluations of alternatives:

The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed. (*County of Inyo v. City of Los Angeles* (1981) 124 Cal.App.3d 1).

An EIR must briefly describe the rationale for the selection and rejection of alternatives, including a presentation of information a lead agency relied on when selecting alternatives. An EIR should also identify any alternatives considered but rejected as infeasible by the lead agency during the scoping process, and briefly explain the reasons for exclusion. Alternatives may be eliminated from detailed consideration in the EIR if they fail to meet most of the project objectives, are infeasible, or do not avoid any significant environmental effects.

CEQA Guidelines Section 15126.6(e)(1) also requires the “No Project alternative” to be addressed in an alternatives analysis. The purpose of evaluating the No Project alternative is to allow decision-makers to compare the potential consequences of a project with the consequences that would occur without implementation of a project.

Finally, an EIR must identify an environmentally superior alternative. The No Project alternative may be environmentally superior to a project based on the minimization or avoidance of physical environmental impacts. However, the No Project alternative must also achieve the project objectives in order to be selected as the environmentally superior alternative. CEQA Guidelines Section 15126.6(e)(2) state if the No Project alternative is designated as the environmentally superior alternative, then the EIR must identify an environmentally superior alternative among the other alternatives (including the proposed Project). The environmentally superior alternative is identified in Section 5.5, *Identification of the Environmentally Superior Alternative*.

5.2 Summary of Project Objectives and Significant Impacts

5.2.1 Project Objectives

The overall objectives of the proposed Project include the following:

- Upgrade aging infrastructure to ensure safe and reliable drinking water;
- Improve existing laboratory space through building functional and safety improvements;
- Upgrade features of the Garvey Reservoir facility to improve seismic safety and building code/ADA compliance and to protect public safety and the environment;
- Enhance management of nitrification within the reservoir; and
- Improve existing facilities and install new facilities to enhance operational reliability, minimize the risk of future facility failures, and facilitate efficient operations and maintenance of Garvey Reservoir.

5.2.2 Review of Significant Environmental Impacts

As discussed in Section 5.1, *Introduction*, the range of alternatives required to be evaluated in an EIR is limited to those alternatives that would avoid or substantially lessen any significant effects of the proposed Project and would feasibly attain most of the proposed Project’s objectives.

The proposed Project would not result in a significant and unavoidable impact (i.e., a significant impact that could not be reduced to a less-than-significant level with mitigation), as described in Chapter 4, *Other Required CEQA Discussion*. The proposed Project would result in significant impacts related to air quality, which would be reduced to less-than-significant levels with implementation of MM AQ-1.

5.3 Alternatives Considered but Rejected

CEQA Guidelines Section 15126.6(a) states that an EIR shall describe “a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project,” as well as provide an evaluation of “the comparative merits of the alternatives.” Under CEQA Guidelines Section 15126.6(a), an EIR does not need to consider alternatives that are not feasible and does not need to address every conceivable alternative to the project. CEQA Guidelines Section 15126.6(f) states that the range of alternatives “is governed by the ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice.” The focus is on informed decision-making and public participation rather than providing a set of alternatives simply to satisfy format.

During the planning process, Metropolitan considered but rejected eight alternatives to the proposed Project. The alternatives that were considered but rejected and the reasoning for why these alternatives were rejected are summarized in Table 35.

Table 35 Alternatives Considered but Rejected

Alternative Number	Alternative	Description of Alternative	Reason Alternative is Considered Infeasible	Reduces Significant but Mitigable Air Quality Impact?
1	No Reservoir Cover and Liner Upgrades	Under this alternative, replacement of the existing reservoir liner and installation of a new floating cover would not be completed.	This alternative would not meet the Project objective of upgrading aging infrastructure to ensure safe and reliable drinking water because the existing reservoir cover and liner would remain at risk of further deterioration and leaks.	No – regional NO _x emissions during Phase 1 construction activities and overall cancer/chronic risks related to Project construction would continue to exceed the SCAQMD thresholds. MM AQ-1 would be required to reduce impacts.
2	No I/O Tower Upgrades	Under this alternative, seismic rehabilitation of the I/O tower would not be completed.	Rehabilitation of the I/O tower is necessary to ensure operational functionality of this critical infrastructure and minimize the risk of future system failures.	No – localized PM ₁₀ emissions during Phase 1 construction activities and overall cancer/chronic risks related to Project construction would continue to exceed the SCAQMD thresholds. MM AQ-1 would be required to reduce impacts.

Alternative Number	Alternative	Description of Alternative	Reason Alternative is Considered Infeasible	Reduces Significant but Mitigable Air Quality Impact?
3	No Junction Structure	Under this alternative, replacement of five valves in the junction structure would not occur.	This alternative would not meet the Project objectives of upgrading aging infrastructure to ensure safe and reliable drinking water and improving existing facilities to enhance operational reliability and minimize the risk of future facility failure because the existing junction structure valves would remain at risk of further deterioration and breaks.	No – overall cancer/chronic risks related to Project construction would continue to exceed the SCAQMD thresholds. MM AQ-1 would be required to reduce impacts.
4	No Facility Electrical System Upgrades	Under this alternative, upgrades to the existing facility electrical system to provide consistent power sources would not be completed.	This alternative would not meet the Project objectives of upgrading aging infrastructure and improving existing facilities to enhance operational reliability and minimize the risk of future facility failures because the existing facility electrical system would remain at risk of further deterioration.	No – regional NO _x emissions and localized PM ₁₀ emissions during Phase 1 construction activities and overall cancer/chronic risks related to Project construction would continue to exceed the SCAQMD thresholds. MM AQ-1 would be required to reduce impacts.
5	No Standby Generator Replacement	Under this alternative, the existing standby generator and its appurtenant electrical system would not be replaced.	This alternative would not meet the Project objectives of upgrading aging infrastructure and improving existing facilities to enhance operational reliability and minimize the risk of future facility failures because the existing standby generator would be at risk of further deterioration.	No – regional NO _x emissions and localized PM ₁₀ emissions during Phase 1 construction activities and overall cancer/chronic risks related to Project construction would continue to exceed the SCAQMD thresholds. MM AQ-1 would be required to reduce impacts.
6	No Surge Tank Telemetry Improvements	Under this alternative, improvements to surge tank telemetry equipment, as well as upgrades to pressure switches and automated tank controls, would not be completed.	This alternative would not meet the Project objectives of upgrading aging infrastructure and improving existing facilities to enhance operational reliability and minimize the risk of future facility failures because the existing surge tank telemetry would be at risk of further deterioration.	No – regional NO _x emissions and localized PM ₁₀ emissions during Phase 1 construction activities and overall cancer/chronic risks related to Project construction would continue to exceed the SCAQMD thresholds. MM AQ-1 would be required to reduce impacts.

Alternative Number	Alternative	Description of Alternative	Reason Alternative is Considered Infeasible	Reduces Significant but Mitigable Air Quality Impact?
7	No Administration Building and Water Quality Laboratory Upgrades	Under this alternative, upgrades to and rehabilitation of the Administration Building and Water Quality Laboratory would not be completed.	This alternative would not meet the Project objectives of improving existing laboratory space through building functional and safety improvements, and upgrading reservoir facilities to improve building code and ADA compliance.	No – regional NO _x emissions and localized PM ₁₀ emissions during Phase 1 construction activities and overall cancer/chronic risks related to Project construction would continue to exceed the SCAQMD thresholds. MM AQ-1 would be required to reduce impacts.
8	No Miscellaneous Site Upgrades	Under this alternative, miscellaneous site upgrades, including upgrades to the ammonia feed system, rehabilitation of existing reservoir roads, replacement of gates and fencing, lighting improvements, replacement of security cameras, and landscaping improvements, would not be completed.	This alternative would not meet the Project objective of improving existing facilities to enhance operational reliability.	No – regional NO _x emissions and localized PM ₁₀ emissions during Phase 1 construction activities and overall cancer/chronic risks would continue to exceed the SCAQMD thresholds. MM AQ-1 would be required to reduce impacts.

5.4 Alternatives Analysis

5.4.1 Alternative 1: No Project

Pursuant to CEQA Guidelines Section 15126.6(e)(2), the No Project alternative shall:

discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

Under the No Project alternative, the proposed Project would not be implemented. Construction of a new pump station, miscellaneous site upgrades, and rehabilitation of the reservoir cover and liner, I/O tower, junction structure, facility electrical system, standby generator, surge tank telemetry, and Administration Building and Water Quality Laboratory would not occur. Garvey Reservoir would largely continue to operate in its existing condition, and various infrastructure and buildings would remain exposed to seismic risk, reduced reliability, and reduced safety. Aging and impaired infrastructure would eventually fail, requiring unplanned shutdowns and potentially disrupting water supply to Metropolitan’s customers. If a major seismic event occurs, significant structural damage could result and compromise the integrity of Garvey Reservoir. Routine maintenance, operations, and repair activities would continue to occur at Garvey Reservoir, as under existing conditions. The No Project alternative would not meet any of the proposed Project objectives.

5.4.1.1 Impact Analysis

Under the No Project alternative, the impacts identified in Section 3, *Environmental Impact Analysis and Mitigation Measures*, and the NOP/Initial Study (Appendix A) associated with the proposed Project would not occur. The No Project alternative would have fewer environmental impacts than the proposed Project due to the lack of construction activities.

Aesthetics

Under the No Project alternative, no construction would occur at Garvey Reservoir. Garvey Reservoir's existing visual character would remain the same as existing conditions and, like the proposed Project, would not conflict with zoning or other regulations governing scenic quality. In addition, no new temporary or permanent lighting or glare sources would be introduced to Garvey Reservoir because no construction would occur. Therefore, the No Project alternative would result in no impacts to aesthetics, which is the same level of impact as the proposed Project (Appendix A).

Agriculture and Forestry Resources

Similar to the proposed Project, the No Project alternative would result in no impacts to agriculture and forestry resources because no Prime Farmland, Unique Farmland, Farmland of Statewide Importance, forestland, or timberland are present or near Garvey Reservoir (Appendix A).

Air Quality

The No Project alternative would not result in any construction or operational activities beyond existing conditions that could result in impacts to air quality. The No Project alternative would be consistent with the underlying growth assumptions of SCAQMD's AQMP because it would not induce additional growth. The No Project alternative would not generate air pollutant emissions for which the SCAB is in nonattainment, or which could adversely affect sensitive receptors. Therefore, the No Project alternative would result in no impacts to air quality, which is a lesser level of impact than the proposed Project. Implementation of MM AQ-1 (detailed in Section 3.1.5.3, *Mitigation Measure*) would not be required.

Biological Resources

The No Project alternative would not involve any construction or operational activities beyond existing conditions at Garvey Reservoir that could result in impacts to biological resources. No special status species would be affected, and the Project site does not contain riparian habitat or other sensitive natural communities (Appendix A). The No Project alternative also would not have an adverse effect to state or federally protected wetlands, interfere substantially with the movement of 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 because none are present within the Project site. The No Project alternative also would not conflict with local policies or ordinances protecting biological resources because no protected trees would be impacted. In addition, the Project site is not covered by a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan (Appendix A). Therefore, the No Project alternative would result in no impacts to biological resources, which is the same level of impact as the proposed Project.

Cultural Resources

Similar to the proposed Project, the No Project alternative would result in no impact to historic resources because none are present within the Project site. The No Project alternative would not involve any ground disturbing activities that could result in the potential disturbance of archaeological resources or human remains. As a result, the No Project alternative would result in no impact to cultural resources, which is a lesser level of impact than the proposed Project, which includes ground disturbance with limited potential to disturb archaeological resources or human remains (Appendix A).

Energy

The No Project alternative would not result in any construction or operational activities beyond existing conditions that could result in impacts to energy. However, the No Project alternative would not result in the upgrades or improvements related to energy efficiency and energy conservation that are proposed for the Administration Building and Water Quality Laboratory. Nevertheless, the No Project alternative would result in no impacts to energy resources as compared to existing conditions, which would be the same level of impact as the proposed Project (Appendix A).

Geology and Soils

The No Project alternative would not result in any construction or operational activities beyond existing conditions that could result in impacts related to erosion, loss of topsoil, unstable geologic units, expansive soils, or paleontological resources. In addition, the Project site would remain at low risk of adverse effects from fault rupture, liquefaction, and landslides. However, the No Project alternative would not include the completion of critical seismic upgrades to the I/O Tower and access bridge. As such, this structure would be exposed to greater risk of impacts related to loss, injury, or death should strong seismic groundshaking occur. As a result, the No Project alternative would result in a greater impact to geology and soils than those that would occur under the proposed Project (Appendix A). However, impacts related to geology and soils under the No Project alternative would still be less than significant.

Greenhouse Gas Emissions

The No Project alternative would not result in any construction or operational activities beyond existing conditions that could result in impacts related to GHG emissions. No GHG emissions would be generated, either directly or indirectly, that may have a significant impact on the environment, and the No Project alternative would not conflict with Metropolitan's CAP. Therefore, the No Project Alternative would result in no impacts to GHG emissions, which is a lesser level of impact than the proposed Project.

Hazards and Hazardous Materials

The No Project alternative would not result in any construction activities that could result in impacts related to hazards and hazardous materials. In addition, similar to the proposed Project, the No Project alternative would not result in changes to existing operations at Garvey Reservoir such that impacts related to airport hazards, emergency response and evacuation plans, and wildland fires would result. Therefore, the No Project Alternative would result in no impacts to hazards and hazardous materials, which is a lesser level of impact than the proposed Project (Appendix A).

Hydrology and Water Quality

The No Project alternative would not result in any construction activities that could result in impacts related to hydrology and water quality. In addition, as with the proposed Project, no groundwater supplies would be utilized, existing stormwater runoff drainage patterns and volumes would remain the same, and the Project site would remain at low risk of releasing pollutants in the event of inundation. Therefore, the No Project Alternative would result in no impacts to hydrology and water quality, which is a lesser level of impact than the proposed Project (Appendix A).

Land Use and Planning

Similar to the proposed Project, the No Project alternative would not physically divide an established community or include any features which would conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating and environmental effect because no changes to the existing Garvey Reservoir would occur (Appendix A). Therefore, the No Project alternative would not result in impacts related to land use and planning, which is the same level of impact as the proposed Project.

Mineral Resources

Similar to the proposed Project, the No Project alternative would not result in impacts to mineral resources because Garvey Reservoir and its surroundings are not designated, zoned, or used for mineral resource extraction, and the No Project alternative would not result in changes to the current land use of the Project site (Appendix A).

Noise

The No Project alternative would not result in any construction or operational activities beyond existing conditions that could result in impacts related to noise and vibration. As a result, this alternative would not generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project site in excess of applicable standards, generate excessive groundborne vibration or groundborne noise levels, or expose people residing or working the Project area to excessive noise levels. Therefore, the No Project alternative would result in no noise and vibration impacts, which is a lesser level of impact than the proposed Project.

Population and Housing

Similar to the proposed Project, the No Project alternative would not induce substantial unplanned population growth, either directly or indirectly, or displace substantial numbers of existing people or housing that would necessitate the construction of replacement housing elsewhere because no changes to existing Garvey Reservoir operations would occur. Therefore, as with the proposed Project, no impacts to population and housing would occur (Appendix A).

Public Services

Similar to the proposed Project, the No Project alternative would not result in additional Metropolitan employees and thus would result in no change in the demand for public services associated with Garvey Reservoir. This alternative would not result in substantial adverse physical environmental impacts associated with the provision of new or physically altered governmental facilities, such as fire protection, police protection, schools, and libraries, to maintain acceptable services ratios, responsive times, or other performance objectives. Therefore, the No Project alternative would result in no impacts to public services, which is the same level of impact as the proposed Project (Appendix A).

Recreation

The No Project alternative would not directly or indirectly induce population growth that would increase the use of existing neighborhood and regional parks or other recreational facilities. Similar to the proposed Project, the No Project alternative would not result in impacts related to recreation because the use of existing recreational facilities in the vicinity would not be increased and no recreational facilities would be constructed or expanded (Appendix A).

Transportation

The No Project alternative would not result in any construction or operational activities beyond existing conditions that could result in impacts related to transportation. The No Project alternative would not increase VMT or result in other activities that could conflict with programs, plans, ordinances, or policies addressing the circulation system or conflict with CEQA Guidelines Section 15064.3(b). The No Project alternative also would not substantially increase hazards due to a geometric design feature or incompatible uses or result in inadequate emergency access because no changes to the existing Garvey Reservoir would occur. Therefore, the No Project alternative would result in no impacts to transportation, which is a lesser level of impact than the proposed Project.

Tribal Cultural Resources

Because no archaeological resources were identified within the Project site and no TCRs were identified within the Project site during the tribal consultation process, the potential to encounter TCRs at the Project site is low (see Section 3.6, *Tribal Cultural Resources*). In addition, the No Project alternative would not involve any construction activities, changes to Garvey Reservoir operations, or ground disturbance that could result in the potential disturbance of TCRs. Therefore, the No Project alternative would result in no impacts to TCRs, similar to the proposed Project.

Utilities and Service Systems

Under the No Project alternative, no construction or operational activities would occur that would increase demand for utilities and service systems beyond existing conditions. The No Project alternative would not require the relocation or construction of additional utility infrastructure or increase water demand, wastewater generation, or solid waste generation. Therefore, the No Project alternative would result in no impacts to utilities and service systems, which is a lesser level of impact than the proposed Project (Appendix A).

Wildfire

The Project site is not located within a State Responsibility Area or a Very High Fire Hazard Severity Zone. Similar to the proposed Project, the No Project alternative would result in no impacts related to wildfire because no construction activities or changes to existing Garvey Reservoir operations would occur that could impair adopted emergency response and evacuation plans, exacerbate wildfire risks, require the installation or maintenance of wildfire prevention infrastructure that may result in temporary or ongoing impacts to the environment, or expose people or structures to significant post-fire risks (Appendix A).

5.4.2 Alternative 2: No Pump Station

Under the No Pump Station alternative, the proposed pump station adjacent to South Orange Avenue and the proposed subsurface valve tie-in to the Middle Feeder would not be constructed. As such, construction activities would conclude with Phase 2 in 2027, and no Phase 3 construction activities would occur. In addition, because the pump station would not be constructed, on-site electricity usage

would not increase. The No Pump Station alternative would meet most of the Project objectives except for enhancing management of nitrification within the reservoir. Under the No Pump Station alternative, nitrification potential in the reservoir would need to be managed through different means, similar to existing conditions. Nitrification potential is currently managed through enhanced mixing within the reservoir; however, this method is not feasible when demand is low due to low reservoir turnover and could create water quality issues in the future.

5.4.2.1 Impact Analysis

Overall, the No Pump Station alternative would avoid environmental impacts associated with Phase 3 construction activities (such as air quality, energy, GHG emissions, noise, and transportation) and would reduce environmental impacts associated with pump station operation (such as energy and GHG emissions) when compared to the proposed Project because the proposed pump station and subsurface valve tie-in would not be installed. However, this alternative would not avoid the proposed Project's significant but mitigable impact related to air quality because 1) regional NO_x and localized PM₁₀ emissions would continue to exceed SCAQMD thresholds during Phase 1 of construction and 2) Phase 3 construction activities represent a minor contribution to the Project's overall cancer and chronic risks that exceed SCAQMD thresholds.

Aesthetics

The No Pump Station alternative would be developed within the same Project footprint but would exclude the proposed pump station adjacent to South Orange Avenue. Therefore, the No Pump Station alternative would have the same impacts related to scenic vistas, views from a state scenic highway, regulations governing scenic quality, and light/glare as the proposed Project. As a result, the No Pump Station alternative would also result in no impacts to aesthetics, which is the same level of impact as the proposed Project (Appendix A).

Agriculture and Forestry Resources

Similar to the proposed Project, the No Pump Station alternative would result in no impact to agriculture and forestry resources because no Prime Farmland, Unique Farmland, Farmland of Statewide Importance, forestland, or timberland are present or near Garvey Reservoir (Appendix A).

Air Quality

Under the No Pump Station alternative, no air pollutant emissions associated with Phase 3 construction activities would occur due to the exclusion of the proposed pump station. However, as with the proposed Project, all Phase 1 construction activities would still occur under this alternative, resulting in an exceedance of the regional NO_x threshold and localized PM₁₀ threshold (see Table 9 and Table 10 in Section 3.1, *Air Quality*). In addition, construction activities associated with the proposed pump station represent a minor contribution to the overall cancer and chronic health associated with Project construction (see Table 14); therefore, cancer and chronic health risk under this alternative would also continue to exceed SCAQMD thresholds. As a result, implementation of MM AQ-1 (detailed in Section 3.1.5.3, *Mitigation Measure*) would be required for this alternative. Although impacts to air quality under this alternative would be slightly lesser when compared to the proposed Project, impacts would remain less than significant with mitigation incorporated, similar to the proposed Project.

Biological Resources

The No Pump Station alternative would require similar construction activities as the proposed Project and would have similar operational characteristics as the proposed Project. No additional special status species, sensitive vegetation communities, wetlands, or other regulated biological resources would be impacted under this alternative. Therefore, the No Pump Station alternative would result in no impacts to biological resources, which is the same level of impact as the proposed Project (Appendix A).

Cultural Resources

The No Pump Station alternative would require similar construction activities as the proposed Project and would have similar operational characteristics as the proposed Project. Because the No Pump Station alternative would involve less ground disturbance due to the exclusion of the proposed pump station, this alternative would result in a nominally reduced potential to unearth previously undisturbed cultural resources when compared to the proposed Project. As such, the No Pump Station alternative would result in less-than-significant impacts to cultural resources, which is the same level of impact as the proposed Project (Appendix A).

Energy

The No Pump Station alternative would require generally similar construction activities as the proposed Project. However, because the No Pump Station alternative would involve less overall construction than the proposed Project, this alternative would result in less energy consumption for construction equipment and construction vehicles when compared to the proposed Project. Similar to the proposed Project, construction of the No Pump Station alternative would occur in accordance with applicable CARB and USEPA standards. Also, Metropolitan and its contractors, for the purposes of environmental awareness and cost-efficiency, would not use energy wastefully, inefficiently, or unnecessarily. In addition, the No Pump Station alternative would avoid the increase in annual on-site electricity usage of approximately 450,000 kWh associated with the pump station. The No Pump Station alternative would also similarly not conflict with or obstruct the energy-related policies of Metropolitan's CAP. As such, the No Pump Station alternative would result in no impacts to energy resources, which is the same level of impact as the proposed Project (Appendix A).

Geology and Soils

The No Pump Station alternative would require similar construction activities as the proposed Project and would have the same operational characteristics as the proposed Project with the exclusion of the proposed pump station. Similar to the proposed Project, seismic rehabilitation of existing infrastructure under the No Pump Station alternative would occur in accordance with California Building Code requirements. As a result, similar impacts related to seismic hazards, soil erosion and loss of topsoil, unstable geologic units and soils, expansive soils, septic tanks and alternative wastewater disposal systems, and paleontological resources would occur under this alternative. Therefore, the No Pump Station alternative would also result in less-than-significant impacts to geology and soils, which is the same level of impact as the proposed Project (Appendix A).

Greenhouse Gas Emissions

The No Pump Station alternative would result in a shorter construction period, which would decrease total GHG emissions during construction by approximately 161 MT of CO₂e to approximately 3,771 MT of CO₂e¹² (see Table 16 in Section 3.2, *Greenhouse Gas Emissions*), resulting in annual

¹² 3,932 MT of CO₂e for proposed Project construction – 161 MT of CO₂e for pump station construction = 3,771 MT of CO₂e per year

amortized construction emissions of approximately 126 MT of CO₂e per year.¹³ In addition, under this alternative, no increase in on-site electricity usage would occur, which would avoid the operational GHG emissions of approximately 109 MT of CO₂e per year associated with the proposed Project (see Table 17 in Section 3.2, *Greenhouse Gas Emissions*). Therefore, total GHG emissions for the No Pump Station alternative would be approximately 126 MT of CO₂e per year, which would be 114 MT of CO₂e per year less than the proposed Project. Metropolitan's annual 2023 CAP Progress Report states approximately 9,252,380 MT of CO₂e remains in the carbon budget for 2023-2045 (Metropolitan 2024). Total GHG emissions for the No Pump Station alternative would be approximately 3,771 MT of CO₂e, which is within the remaining quantified carbon budget as of 2023. This alternative would have the same operational characteristics as the proposed Project related to building and equipment electrification and LED lighting. Therefore, the No Pump Station alternative would be similarly consistent with Metropolitan's CAP. As such, the No Pump Station alternative would result in reduced GHG emissions as compared to the proposed Project and would result in less-than-significant impacts related to GHG emissions, which is the same level of impact as the proposed Project.

Hazards and Hazardous Materials

The No Pump Station alternative would require similar construction activities and would have the same operational characteristics as the proposed Project. As a result, similar impacts related to the routine transport, use, or disposal of hazardous materials; the creation of a significant hazard through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; the emission of hazardous materials or substances near schools; hazardous waste sites; airport hazards; emergency response and evacuation plans; and wildland fires would occur under this alternative. Therefore, the No Pump Station alternative would result in less-than-significant impacts to hazards and hazardous materials, which is the same level of impact as the proposed Project (Appendix A).

Hydrology and Water Quality

The No Pump Station alternative would require similar construction activities and would have similar operational characteristics as the proposed Project. As a result, similar impacts related to surface and groundwater quality, groundwater supplies and recharge, existing drainage patterns, and the release of pollutants due to flooding would occur under this alternative. Therefore, the No Pump Station alternative would result in less-than-significant impacts to hydrology and water quality, which is the same level of impact as the proposed Project (Appendix A).

Land Use and Planning

Similar to the proposed Project, the No Pump Station alternative would not physically divide an established community or conflict with the existing land uses of Garvey Reservoir such that environmental impacts would occur. Therefore, the No Pump Station alternative would result in no impacts to land use and planning, which is the same level of impact as the proposed Project (Appendix A).

Mineral Resources

Similar to the proposed Project, the No Pump Station alternative would not result in impacts to mineral resources because Garvey Reservoir and its surroundings are not designated, zoned, or used

¹³ 3,771 MT of CO₂e / 30 years = 126 MT of CO₂e per year

for mineral resource extraction, and this alternative would not result in changes to the current land use of the Project site (Appendix A).

Noise

The No Pump Station alternative would require similar construction activities as the proposed Project. However, the No Pump Station alternative would involve less overall construction than the proposed Project due to the exclusion of the proposed pump station. As a result, the duration of exposure of nearby sensitive receivers to construction noise and vibration would be reduced. In addition, because the proposed pump station would not be installed, noise associated with pump station operation would be avoided, which would reduce daytime and nighttime operational noise levels experienced at nearby sensitive receivers as compared to the proposed Project. Operational noise levels from this alternative would be under the applicable thresholds, similar to the proposed Project. Off-site roadway noise levels as well as operational vibration levels generated by the No Pump Station alternative would be the same as the proposed Project. Therefore, under the No Pump Station alternative, impacts related to noise would be less than significant, which is the same level of impact as the proposed Project.

Population and Housing

Similar to the proposed Project, the No Pump Station alternative would not induce unplanned population growth, either directly or indirectly, or displace existing people or housing that would necessitate the construction of replacement housing elsewhere, because no changes to existing Garvey Reservoir operations would occur. Therefore, as with the proposed Project, no impacts to population and housing would occur (Appendix A).

Public Services

Similar to the proposed Project, the No Pump Station alternative would not result in additional Metropolitan employees and thus would result in no change in the demand for public services associated with Garvey Reservoir. This alternative would not result in substantial adverse physical environmental impacts associated with the provision of new or physically altered governmental facilities, such as fire protection, police protection, schools, and libraries, to maintain acceptable services ratios, responsive times, or other performance objectives. Therefore, the No Pump Station alternative would result in no impact to public services, which is the same level of impact as the proposed Project (Appendix A).

Recreation

The No Pump Station alternative would not directly or indirectly induce population growth that would increase the use of existing neighborhood and regional parks or other recreational facilities. Similar to the proposed Project, the No Pump Station alternative would not result in impacts related to recreation because the use of existing recreational facilities in the vicinity would not be increased and no recreational facilities would be constructed or expanded (Appendix A).

Transportation

The No Pump Station alternative would require similar construction activities and would have similar operational characteristics as the proposed Project. However, because Phase 3 construction activities would be avoided, the No Pump Station alternative would reduce the duration of construction-related transportation impacts. As such, the No Pump Station alternative would result in slightly lower impacts to the local transportation network during construction as compared to the proposed Project.

The No Pump Station alternative would result in less-than-significant impacts to transportation, which is the same level of impact as the proposed Project.

Tribal Cultural Resources

Because no archaeological resources were identified within the Project site and no TCRs were identified within the Project site during the tribal consultation process, the potential to encounter TCRs at the Project site is low (see Section 3.6, *Tribal Cultural Resources*). Because the No Pump Station alternative would involve less ground disturbance due to the exclusion of the proposed pump station, this alternative would result in a nominally reduced potential to unearth previously undisturbed archaeological resource, including an archaeological resource that could also be a TCR, when compared to the proposed Project. The No Pump Station alternative would result in no impacts to TCRs, which is the same level of impact as the proposed Project.

Utilities and Service Systems

The No Pump Station alternative would require similar construction activities and would have similar operational characteristics as the proposed Project. Therefore, the No Pump Station alternative would result in less-than-significant impacts to utilities and service systems, which is the same level of impact as the proposed Project (Appendix A).

Wildfire

The Project site is not located within a State Responsibility Area or a Very High Fire Hazard Severity Zone. The No Pump Station alternative would require similar construction activities and would have similar operational characteristics as the proposed Project. As such, this alternative would not substantially impair an adopted emergency response or an emergency evacuation plan, or exacerbate any wildfire risks due to slope, prevailing winds, and other related wildfire factors. The No Pump Station alternative would result in no impacts related to wildfire, which is the same level of impact as the proposed Project (Appendix A).

5.4.3 Summary of Alternatives Analysis

Table 36 compares the environmental impacts of the identified alternatives to the proposed Project.

Table 36 Summary Comparison of Alternative Impacts

Environmental Resource Area	Proposed Project	No Project	No Pump Station
Aesthetics	No Impact	No Impact	No Impact
Agriculture and Forestry Resources	No Impact	No Impact	No Impact
Air Quality	AQ-A: Less Than Significant with Mitigation Incorporated AQ-B: Less Than Significant with Mitigation Incorporated AQ-C: Less Than Significant with Mitigation Incorporated AQ-D: Less Than Significant	No Impact	AQ-A: Less Than Significant with Mitigation Incorporated AQ-B: Less Than Significant with Mitigation Incorporated AQ-C: Less Than Significant with Mitigation Incorporated AQ-D: Less Than Significant

Environmental Resource Area	Proposed Project	No Project	No Pump Station
Biological Resources	No Impact	No Impact	No Impact
Cultural Resources	Less Than Significant/ No Impact	No Impact	Less Than Significant/ No Impact
Energy	No Impact	No Impact	No Impact
Geology and Soils	Less Than Significant/ No Impact	Less Than Significant/ No Impact	Less Than Significant/ No Impact
Greenhouse Gas Emissions	GHG-A: Less Than Significant GHG-B: No Impact	No Impact	GHG-A: Less Than Significant GHG-B: No Impact
Hazards and Hazardous Materials	Less Than Significant/ No Impact	No Impact	Less Than Significant/ No Impact
Hydrology and Water Quality	Less Than Significant/ No Impact	No Impact	Less Than Significant/ No Impact
Land Use and Planning	No Impact	No Impact	No Impact
Mineral Resources	No Impact	No Impact	No Impact
Noise	NOI-A: Less Than Significant NOI-B: Less Than Significant	No Impact	NOI-A: Less Than Significant NOI-B: Less Than Significant
Population and Housing	No Impact	No Impact	No Impact
Public Services	No Impact	No Impact	No Impact
Recreation	No Impact	No Impact	No Impact
Transportation	TRA-A: Less Than Significant TRA-B: Less Than Significant TRA-C: Less Than Significant TRA-D: Less Than Significant	No Impact	TRA-A: Less Than Significant TRA-B: Less Than Significant TRA-C: Less Than Significant TRA-D: Less Than Significant
Tribal Cultural Resources	TCR-A: No Impact	No Impact	TCR-A: No Impact
Utilities and Service Systems	Less Than Significant/ No Impact	No Impact	Less Than Significant/ No Impact
Wildfire	No Impact	No Impact	No Impact

Note: Environmental impacts studied in this Draft EIR are further organized by threshold (e.g., AQ-A, AQ-B, AQ-C, AQ-D). Those impacts studied in the Initial Study (Appendix A) are organized broadly by category (e.g., aesthetics, wildfire).

5.5 Environmentally Superior Alternative

If an alternative is considered clearly superior to a proposed project relative to identified impacts, CEQA Guidelines Section 15126.6 requires that alternative be identified as the environmentally superior alternative. By statute, if the environmentally superior alternative is the No Project Alternative, an EIR must also identify an environmentally superior alternative among the other alternatives.

Table 36 compares the impacts of the identified alternatives to the proposed Project. Based on the analysis provided in Section 5.4, *Alternatives Analysis*, the No Project alternative would have “similar,” “similar but reduced,” or “reduced” environmental impacts compared to the proposed Project with regard to: aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, energy, GHG 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, and wildfire. The No Project alternative would result in reduced impacts because no construction activities or changes to the existing operational characteristics of Garvey Reservoir would occur, and the proposed Project's significant but mitigable impacts related to air quality would not occur. Although this alternative would result in greater impacts than the proposed Project related to seismic groundshaking due to lack of upgrades to aging infrastructure, the No Project alternative would overall result in fewer environmental impacts than the proposed Project.

The No Pump Station alternative would have "similar" or "similar but reduced" environmental impacts as the proposed Project with regard to: aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, energy, geology and soils, GHG 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, and wildfire. Environmental impacts under this alternative would generally be similar but reduced as compared to the proposed Project because of the reduced duration of construction activities and because no on-site increase in electricity usage would be required. However, this alternative would not avoid the proposed Project's significant but mitigable impact related to air quality.

Therefore, among the proposed Project and the two alternatives evaluated, the No Project alternative would be the environmentally superior alternative because it would avoid the proposed Project's significant but mitigable impacts related to air quality and would result in generally similar or reduced impacts to other environmental resources. However, the No Project alternative would not meet any of the Project objectives. If the No Project alternative is the environmentally superior alternative, CEQA requires identification of an environmentally superior alternative among the remaining alternatives (CEQA Guidelines Section 15126.6[e]). As a result, between the proposed Project and the No Pump Station alternative, the No Pump Station alternative would be considered the environmentally superior alternative because it would result in similar or lesser impacts to most environmental resources as compared to the proposed Project, reduce the severity of the significant but mitigable air quality impact (but would not eliminate the need for implementation of Mitigation Measure AQ-1), and would meet most of the Project objectives. However, this alternative would not meet the Project objective of enhancing management of nitrification within the reservoir.

6 References and Preparers

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6.2 Preparers

6.2.1 The Metropolitan Water District of Southern California

Jennifer Harriger, Manager, Environmental Planning Section

Sean Carlson, Team Manager, Environmental Planning Section

Michelle Morrison, Senior Environmental Specialist, Environmental Planning Section

Elizabeth Florence, Associate Environmental Specialist, Environmental Planning Section

6.2.2 Rincon Consultants, Inc.

Jennifer Haddow, PhD, Principal Environmental Scientist

Jennifer Jacobus, PhD, Principal of Water Planning and Sustainability

Annaliese Torres, Senior Environmental Planner

Bill Vosti, Senior Environmental Planner

Nicholas Carter, Environmental Planner

Yaritza Ramirez, Publishing Specialist

7 Acronyms and Abbreviations

AB	Assembly Bill
ADA	Americans with Disabilities Act
AERMOD	American Meteorological Society/Environmental Protection Agency Regulatory Model
AQMP	Air Quality Management Plan
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CalOSHA	California Occupational Safety and Health Administration
CEQA	California Environmental Quality Act
City	City of Monterey Park
CO	Carbon Monoxide
CO ₂	Carbon Dioxide
CO ₂ e	Carbon Dioxide Equivalent
dB	decibels
dBA	A-weighted decibels
DPM	diesel particulate matter
EIR	Environmental Impact Report
EO	Executive Order
FTA	Federal Transit Administration
GHG	Greenhouse Gas
GWP	global warming potential
HVAC	heating, ventilation, and air conditioning
I-10	Interstate 10
I/O	inlet/outlet
in/sec	inches per second

IPCC	Intergovernmental Panel on Climate Change
kWh	kilowatt-hour
LED	Light Emitting Diode
L _{eq}	Equivalent Noise Level
LOS	Level of Service
LST	Localized Significance Threshold
MATES	Multiple Air Toxics Exposure Study
Metropolitan	The Metropolitan Water District of Southern California
MMRP	Mitigation Monitoring and Reporting Program
MPMC	Monterey Park Municipal Code
MT	metric tons
NAAQS	National Ambient Air Quality Standards
NO _x	nitrogen oxides
NOP	Notice of Preparation
OPR	California Governor's Office of Planning and Research
PM	particulate matter
PM ₁₀	particulate matter 10 microns or less in diameter
PM _{2.5}	particulate matter 2.5 microns or less in diameter
PPV	peak particle velocity
PRC	Public Resources Code
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCH	State Clearinghouse
SO ₂	sulfur dioxide
SR	State Route
SRA	Source Receptor Area
TACs	toxic air contaminants
TCR	Tribal Cultural Resources
USEPA	United States Environmental Protection Agency
VMT	vehicle miles traveled
VOCs	volatile organic compounds



*THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA*

**The Metropolitan Water District
of Southern California**

700 North Alameda Street
Los Angeles, CA 90012-2944

213-217-6000

mwdh2o.com
