

**SUBJECT: NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT**

**PROJECT TITLE: PROPOSED LOS ANGELES DEPARTMENT OF WATER AND POWER'S ELECTRICAL GENERATION STATIONS MODIFICATIONS PROJECT**

In accordance with the California Environmental Quality Act (CEQA), the South Coast Air Quality Management District (SCAQMD) is the Lead Agency for the project identified above and will be preparing a Draft Environmental Impact Report (EIR). This Notice of Preparation (NOP) serves to notify the public of the SCAQMD's intent to prepare a Draft EIR to assess potential adverse environmental impacts that may result from implementing the proposed project and to solicit the public's input on the scope of the environmental analysis for the proposed project. Consequently, the Draft EIR will discuss all topics required by CEQA, including mitigation measures, if necessary and available, to reduce potential significant adverse environmental impacts.

This NOP and the Initial Study (IS) are not SCAQMD applications or forms requiring a response from you. Its purpose is simply to provide information to you on the above project. If the proposed project has no bearing on you or your organization, no action on your part is necessary.

The proposed project's description, location, and potential adverse environmental impacts are described in the IS that is attached to this NOP. Comments focusing on your area of expertise, your agency's area of jurisdiction, or issues relative to the environmental analysis to be conducted in the Draft EIR as identified in this NOP/IS may be submitted during the 30-day public review and comment period beginning Tuesday, October 3, 2000, and ending 5 p.m. on Friday, November 3, 2000. **Please send any comments to Mr. Darren Stroud (c/o Office of Planning, Rule Development, and Area Sources) at the address shown above.** Comments can also be sent via facsimile to (909) 396-3324 or e-mail at dstroud@aqmd.gov. Mr. Stroud can be reached by calling (909) 396-2526. Please include the name and phone number of the contact person for your agency.

**Date:** September 29, 2000

**Signature:** Steve Smith

Steve Smith, Ph.D.  
Program Supervisor

**SUBJECT: NOTICE OF PREPARATION OF AN ENVIRONMENTAL ASSESSMENT**

**PROJECT TITLE: PROPOSED LOS ANGELES DEPARTMENT OF WATER AND POWER'S ELECTRICAL GENERATION STATIONS MODIFICATIONS PROJECT**

In accordance with the California Environmental Quality Act (CEQA), the South Coast Air Quality Management District (SCAQMD) is the Lead Agency for the project identified above and will be preparing a Draft Environmental Impact Report (EIR). This Notice of Preparation (NOP) serves to notify the public that the of the SCAQMD's intent to prepare a Draft EIR to assess potential adverse environmental impacts that may result from implementing the proposed project and to solicit the public's input on the scope of the environmental analysis for the proposed project. Consequently, the Draft EIR will discuss all topics required by CEQA, including mitigation measures, if necessary and available, to reduce potential significant adverse environmental impacts.

This NOP are not SCAQMD applications or forms requiring a response from you. Their purpose is simply to provide information to you on the above project. If the proposed project has no bearing on you or your organization, no action on your part is necessary.

The Initial Study, which identifies the environmental impacts that will be analyzed in the Draft EIR, and other relevant documents may be obtained by calling the SCAQMD's Public Information Center at (909) 396-3600 or downloaded from the SCAQMD's website at <http://www.aqmd.gov/ceqa/nonaqmd.html>. Comments focusing on your area of expertise, your agency's area of jurisdiction, or issues relative to the environmental analysis to be conducted in the Draft EIR as identified in this NOP/IS may be submitted during the 30-day public review and comment period beginning Tuesday, October 3, 2000, and ending 5 p.m. on Friday, November 3, 2000. **Please send any comments to Mr. Darren Stroud (c/o Office of Planning, Rule Development, and Area Sources) at the address shown above.** Comments can also be sent via facsimile to (909) 396-3324 or e-mail at [dstroud@aqmd.gov](mailto:dstroud@aqmd.gov). Mr. Stroud can be reached by calling (909) 396-2526. Please include the name and phone number of the contact person for your agency.

Date: September 29, 2000

Signature: 

Steve Smith, Ph.D.  
Program Supervisor

Reference: California Code of Regulations, Title 14, §§15082(a), 15103, and 15375

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

**NOTICE OF PREPARATION**

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**Project Title:**

Proposed Los Angeles Department Of Water And Power's (LADWP) Electrical Generation Stations Modifications Project

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**Project Location:**

The Harbor Generating Station (161 North Island Avenue, City of Los Angeles (Wilmington) adjacent to the Port of Los Angeles), the Scattergood Generating Station (12700 Vista Del Mar in the City of Los Angeles (Playa Del Rey)), and the Valley Generating Station (9430 San Fernando Road in the City of Los Angeles (Sun Valley)).

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**Description of Nature, Purpose, and Beneficiaries of Project:**

LADWP is proposing modifications to three generating stations located in the Basin. It is envisioned that the proposed project, consistent with the intent of SCAQMD's Regulation XX – Regional Clean Air Market Incentives (RECLAIM), will achieve an overall decrease in oxides of nitrogen emissions from the affected generating stations.

In particular, LADWP at its Harbor Generating Station is proposing to install five 47-MegaWatt (MW) combustion turbines (CTs), associated selective catalytic reduction (SCR) systems, and ancillary equipment to control various combustion emissions from the new CTs. The project site will also include either installation of a 30,000-gallon aboveground aqueous ammonia storage tank or the construction of a pipeline to transport the ammonia from an existing on-site tank to the new SCRs.

LADWP at its Scattergood Generating Station is proposing to install SCR on three existing units and install three 30,000-gallon aboveground aqueous ammonia storage tanks.

LADWP at its Valley Generating Station is proposing to install one 47-MW CT, an associated SCR, ancillary equipment to control various combustion emissions from the new CT, and install one 30,000-gallon aboveground aqueous ammonia storage tank.

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**Lead Agency:**

South Coast Air Quality  
Management District

**Division:**

Planning, Rule Development, and Area Sources  
CEQA Section

**Contact Person:**

Darren W. Stroud

**Phone Number:**

(909) 396-2526

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**Initial Study and all supporting  
documentation are available at:**

SCAQMD Headquarters  
21865 E. Copley Drive  
Diamond Bar, CA 91765

**or by calling:**

(909) 396-3600

**or by accessing the SCAQMD's website at:**

<http://www.aqmd.gov/ceqa/nonaqmd.html>

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**Initial Study Review Period:**

October 3 – November 3, 2000

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

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**DRAFT INITIAL STUDY FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR:**

**Los Angeles Department Of Water And Power's Installation Of Five Combustion Turbines At The Harbor Generating Station, Installation Of Three Selective Catalytic Reduction Systems At The Scattergood Generating Station, And The Installation Of One Combustion Turbine At The Valley Generating Station**

**September 2000**

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## **CHAPTER 1**

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### **INTRODUCTION**

**Project Overview**

**Agency Authority**

**Project Location**

## 1.1 PROJECT OVERVIEW

Regulation XX - Regional Clean Air Incentives Market (RECLAIM), is an alternative regulatory program designed and adopted by the South Coast Air Quality Management District (SCAQMD) to reduce oxides of Nitrogen (NO<sub>x</sub>) and sulfur dioxides (SO<sub>x</sub>) emissions from stationary sources in the South Coast Air Basin (Basin) while lowering the cost of attaining clean air through the use of market incentives. The goals of RECLAIM are to give affected facilities added flexibility in meeting their emission reduction requirements, to lower the cost of compliance, and assist the SCAQMD's efforts to attain and maintain state and federal ambient air quality standards. RECLAIM prescribes only total facility emissions goals and facility operators are free to choose control strategies that work best for their facility. The emission reduction goals are established in the form of declining annual Allocations. Facilities comply with RECLAIM by installing control equipment that limits their annual NO<sub>x</sub> and or SO<sub>x</sub> emission to below or at their annual Allocations or purchase additional RECLAIM Trading Credits (RTCs) to account for any exceedances above their annual Allocations.

To help LADWP comply with its annual RECLAIM Allocations for future years, improve in-Basin power reliability, and participate in the California Independent System Operator ("Cal-ISO") by supplying excess electrical power on a daily basis during the summer, thereby reducing the risk of blackouts for the state, LADWP is proposing modifications to three generating stations located in the Basin. It is envisioned that the proposed project, consistent with the intent of RECLAIM, will achieve an overall decrease in NO<sub>x</sub> emissions from the affected facilities.

To accomplish the aforementioned goals at the earliest possible time and prevent potential future exceedances of their RECLAIM annual Allocations, LADWP has entered into a compliance agreement with the SCAQMD. The agreement requires that LADWP begin equipment installation and modifications at three generating facilities starting early in 2001, such that affected power generating units will be in-use by summer 2001. The modifications that will be conducted at the three LADWP power generating facilities, all of which are subject to the SCAQMD's RECLAIM Program, are briefly discussed below. For a complete description proposed project and the anticipated activities at the three project sites, the reader is referred to Chapter 2 of this document.

### **Harbor Generating Station (HGS)**

At this power generating station, LADWP is proposing to install five 47-MegaWatt (MW) combustion turbines (CTs), associated selective catalytic reduction (SCR) systems, and ancillary equipment to control various combustion emissions from the new CTs. The project site will also include either installation of a 30,000-gallon aboveground aqueous ammonia storage tank or the construction of a pipeline to transport the ammonia from an existing on-site tank to the new SCRs

### **Scattergood Generating Station (SGS)**

At this power generating station, LADWP is proposing to install SCR units on three existing power generating units and install three 30,000-gallon aboveground aqueous ammonia storage tanks.

### **Valley Generating Station (VGS)**

At this power generating station, LADWP is proposing to install one new 47-MW CT, an associated SCR, ancillary equipment to control various combustion emissions from the new CT, and install one 30,000-gallon aboveground aqueous ammonia storage tank.

## **1.2 AGENCY AUTHORITY**

The California Environmental Quality Act (CEQA) applies to “projects” proposed to be undertaken or requiring approval by State and local government agencies. The proposed installation of the CTs and SCRs constitutes a “project” as defined by CEQA (Cal. Public Resources Code §§21000 et seq.). However, where a project requires approvals from more than one public agency, CEQA requires one of these public agencies to serve as the “lead agency.” Pursuant to CEQA Guidelines §15367, “‘Lead Agency’ means the public agency which has the principal responsibility for carrying out or approving a project.” As this project is being undertaken to comply with air quality regulations (i.e., RECLAIM), LADWP and the SCAQMD have concluded that the SCAQMD is the appropriate lead agency.

As a lead agency for this project, the SCAQMD must complete an environmental review to determine if the proposed project could create significant environmental impacts. To fulfill the purpose and intent of CEQA, this Initial Study (IS) has been prepared. Based on the project description and the responses to the environmental checklist (see Chapter 3), the impact areas for which no significant environmental impact is expected to occur have been identified and thereby eliminated from further evaluation. Impact areas for which there is a potential for significant environmental impacts will be evaluated in an Environmental Impact Report (EIR), prepared for this project.

The Final Environmental Assessment (FEA) for the RECLAIM program (October 1993) analyzed generally the impacts associated with the use of various add-on pollution controls to comply with RECLAIM. In particular, the FEA for the RECLAIM program incorporated by reference specific environmental analyses conducted for specific add-on pollution controls (e.g., SCR) that could be used by power generating facilities to comply with RECLAIM. To the extent that these analyses adequately address the potential environmental impacts associated with this project, no further analysis will be required (CEQA Guidelines §15152(d)).

The SCAQMD is evaluating the potential adverse impacts from the actions at each project site that comprise this project in a single EIR rather than three separate EIRs for the following reasons: projects are being undertaken by a single entity; the actions will occur within the relative same time period; the actions are being undertaken to comply with a single regulation (e.g., RECLAIM); and the actions undertaken are similar in nature (e.g., installation of CTs and use, storage, and handling of aqueous ammonia). The EIR for the proposed project will not only include an of the potential site-specific impacts at each facility, but allow the SCAQMD to provide a more comprehensive analysis of the cumulative impacts from all three project sites.

### **1.3 PROJECT LOCATION**

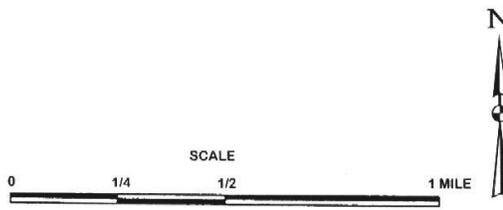
The locations of the LADWP's three power generating stations are shown in Figures 1-1, 1-2, and 1-3. The HGS is located at 161 North Island Avenue, City of Los Angeles (Wilmington) adjacent to the Port of Los Angeles. A site plan is shown on Figure 1-4. The HGS occupies an irregularly shaped parcel of land bordered by Harry Bridges Boulevard to the north; Avalon Boulevard to the east; a container storage area to the south; and Lagoon Avenue to the west. The nearest residential area is located approximately one-quarter mile to the north.

The SGS is located at 12700 Vista Del Mar in the City of Los Angeles (Playa Del Rey). A site plan is shown on Figure 1-5. The facility is bounded to the west by the Pacific Ocean; to the east by a residential neighborhood of single-family dwellings; to the south by Grand Avenue, beyond which is the Chevron El Segundo Refinery; and to the north by the Hyperion Wastewater Treatment Plant.

The VGS is located at 9430 San Fernando Road in the City of Los Angeles (Sun Valley). A site plan is shown on Figure 1-6. The VGS occupies a parcel of land bounded by Glenoaks to the northeast; Sheldon Road to the southeast; San Fernando Road to the southwest; and a flood control channel to the northwest, beyond which is Branford Road. The area surrounding the facility is primarily commercial/industrial; however, an emergency medical clinic, a hospital and two motels are adjacent to the site on San Fernando Road. A sand and gravel plant is located adjacent to the northwest of the site. There are no residences in the immediate vicinity of the VGS. The nearest residential properties are located approximately one-half mile to the north.



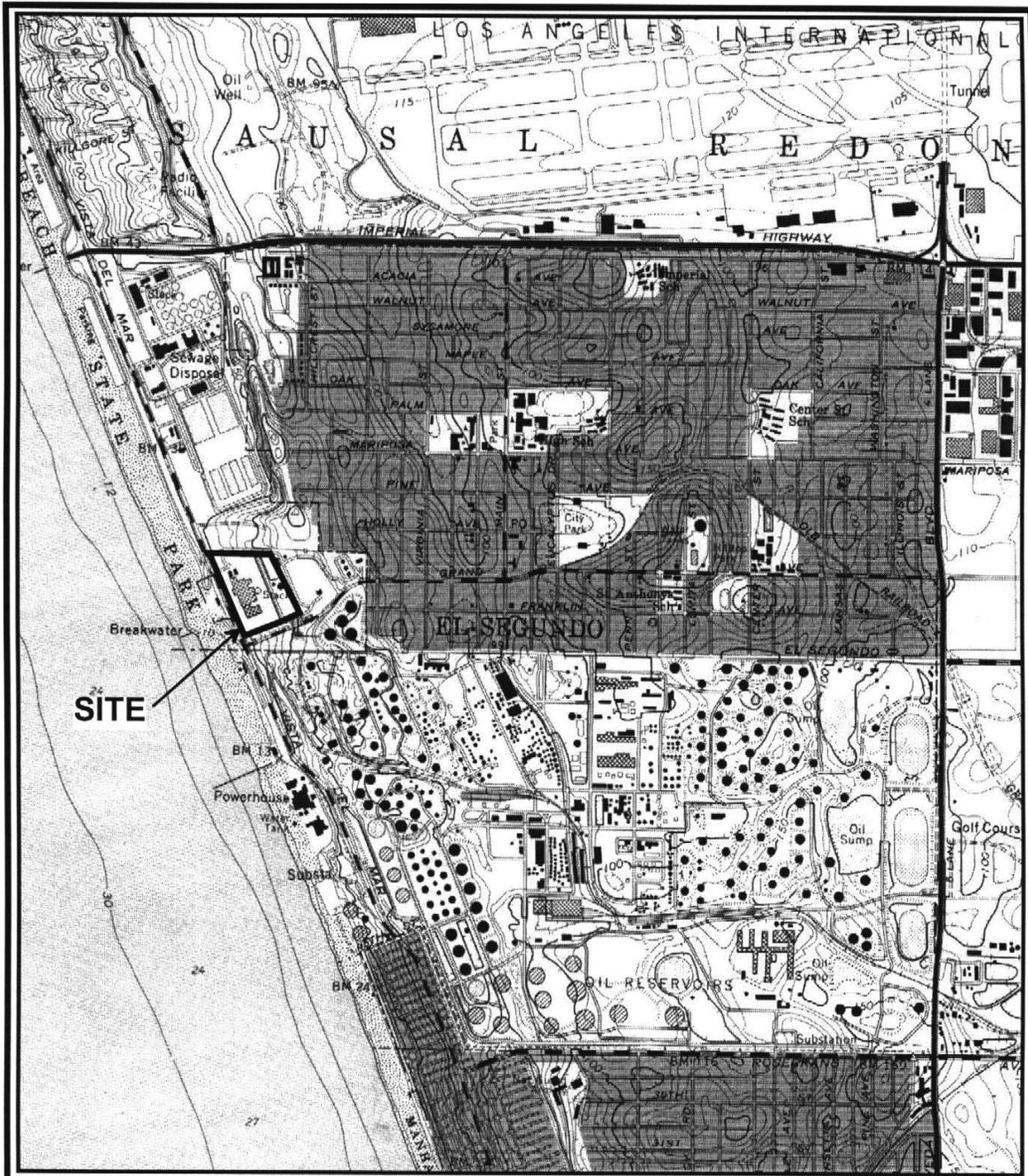
SOURCE: USGS 7.5 Minute Topographic Quadrangle, Torrance, CA, 1964, Photorevised 1981



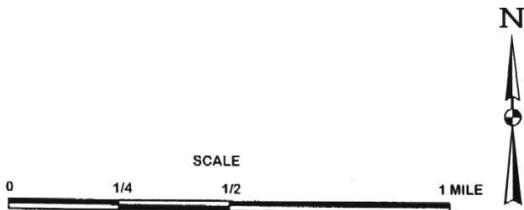
**ENSR**

FIGURE 1  
**SITE LOCATION MAP**  
 Harbor Generating Station  
 161 North Island Avenue  
 Wilmington, CA

Drawn by: M. Scop	Date: 8/30/2000	Project Number: 6190-026-100
Figure Name: 6190026C.dsf	Checked by:	



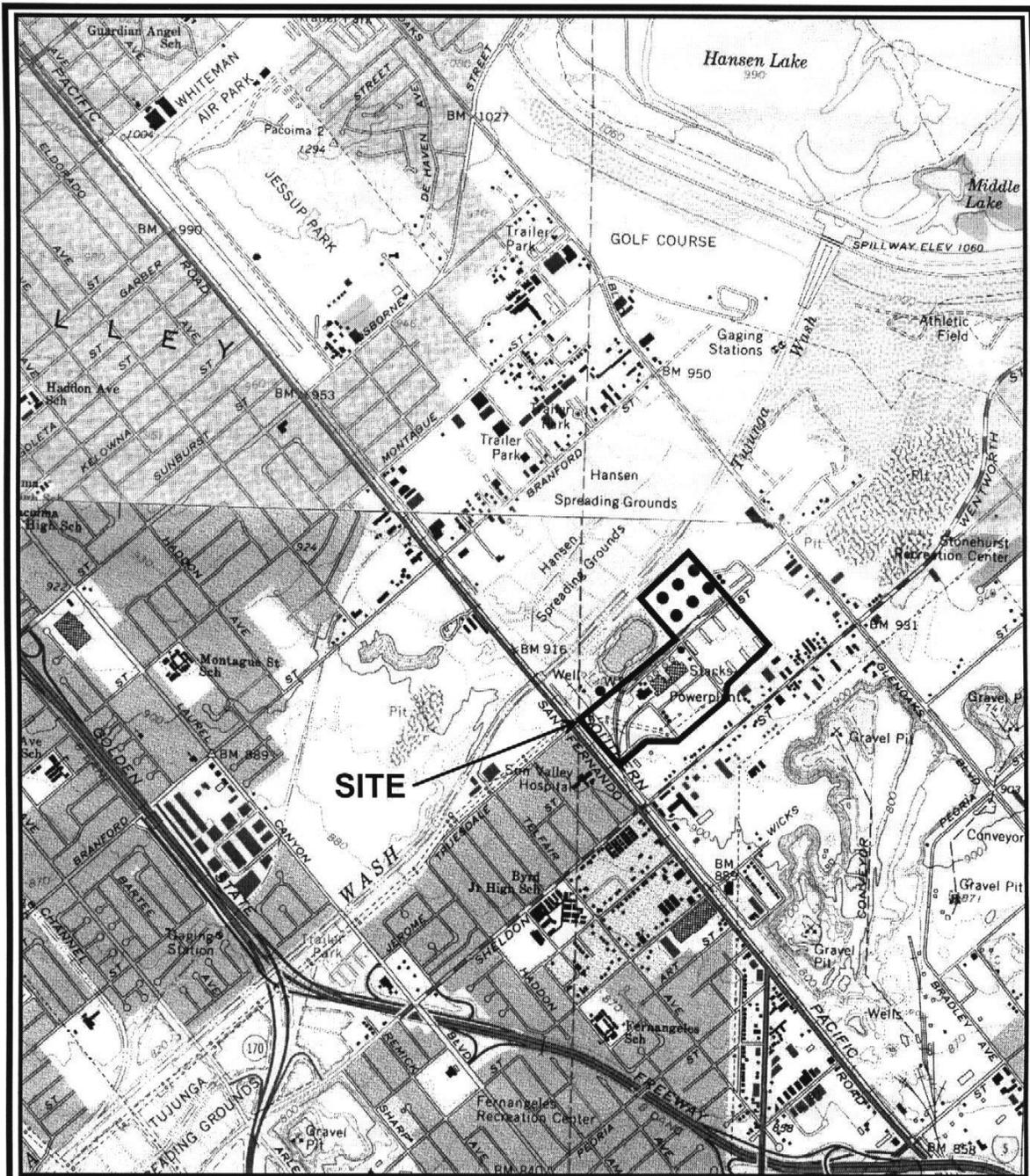
SOURCE: USGS 7.5 Minute Topographic Quadrangle, Venice, CA, 1964, Photorevised 1981



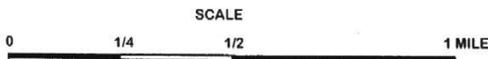
**ENSR**

FIGURE 2  
**SITE LOCATION MAP**  
 Scattergood Generating Station  
 12700 Vista Del Mar  
 Playa Del Rey, CA

Drawn by: M. Scop	Date: 8/30/2000	Project Number 6190-026-100
Figure Name: 6190026b.dsf	Checked by:	



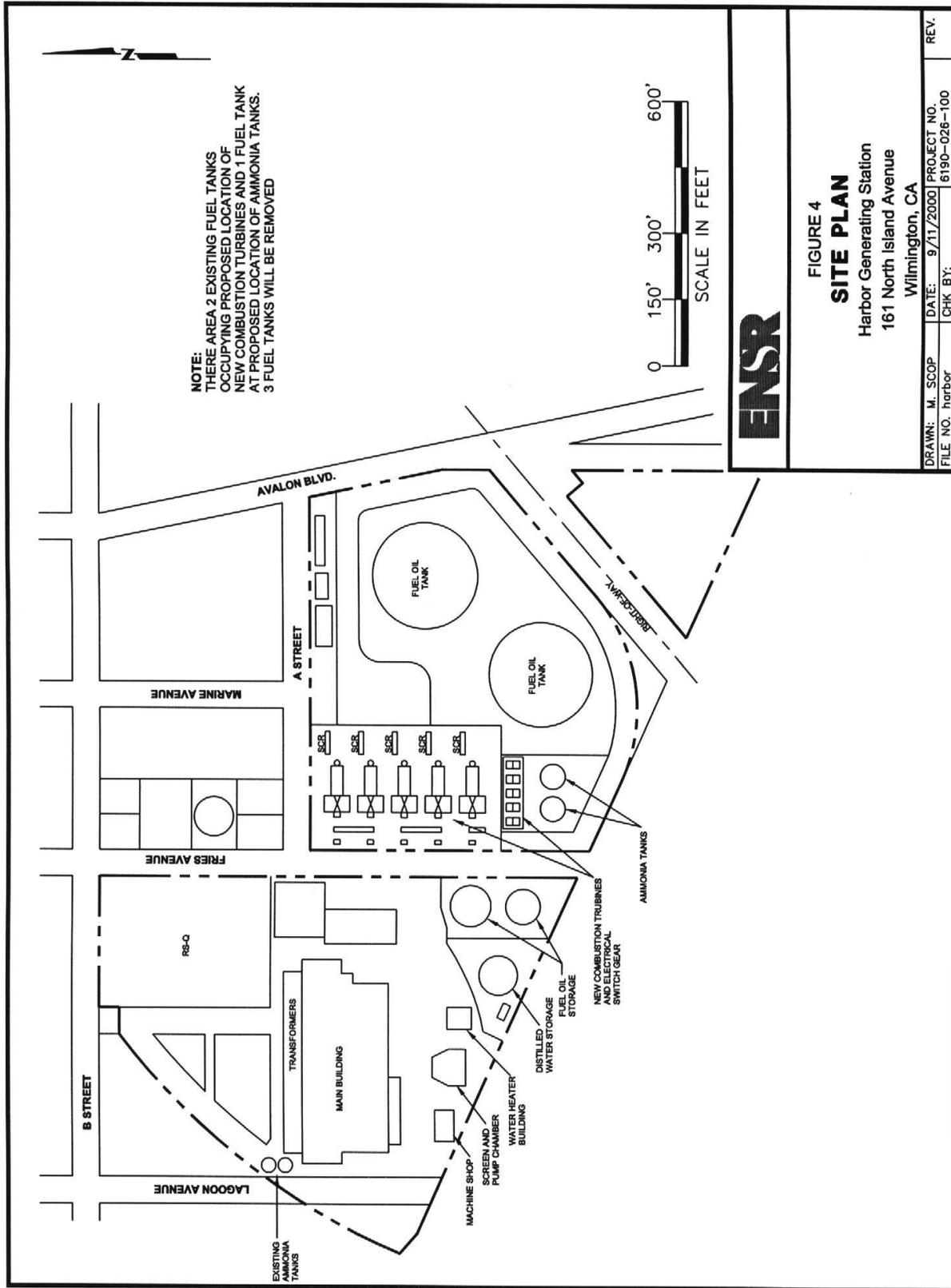
SOURCE: USGS 7.5 Minute Topographic Quadrangles,  
 Van Nuys and San Fernando, CA,  
 1966, Photorevised 1972

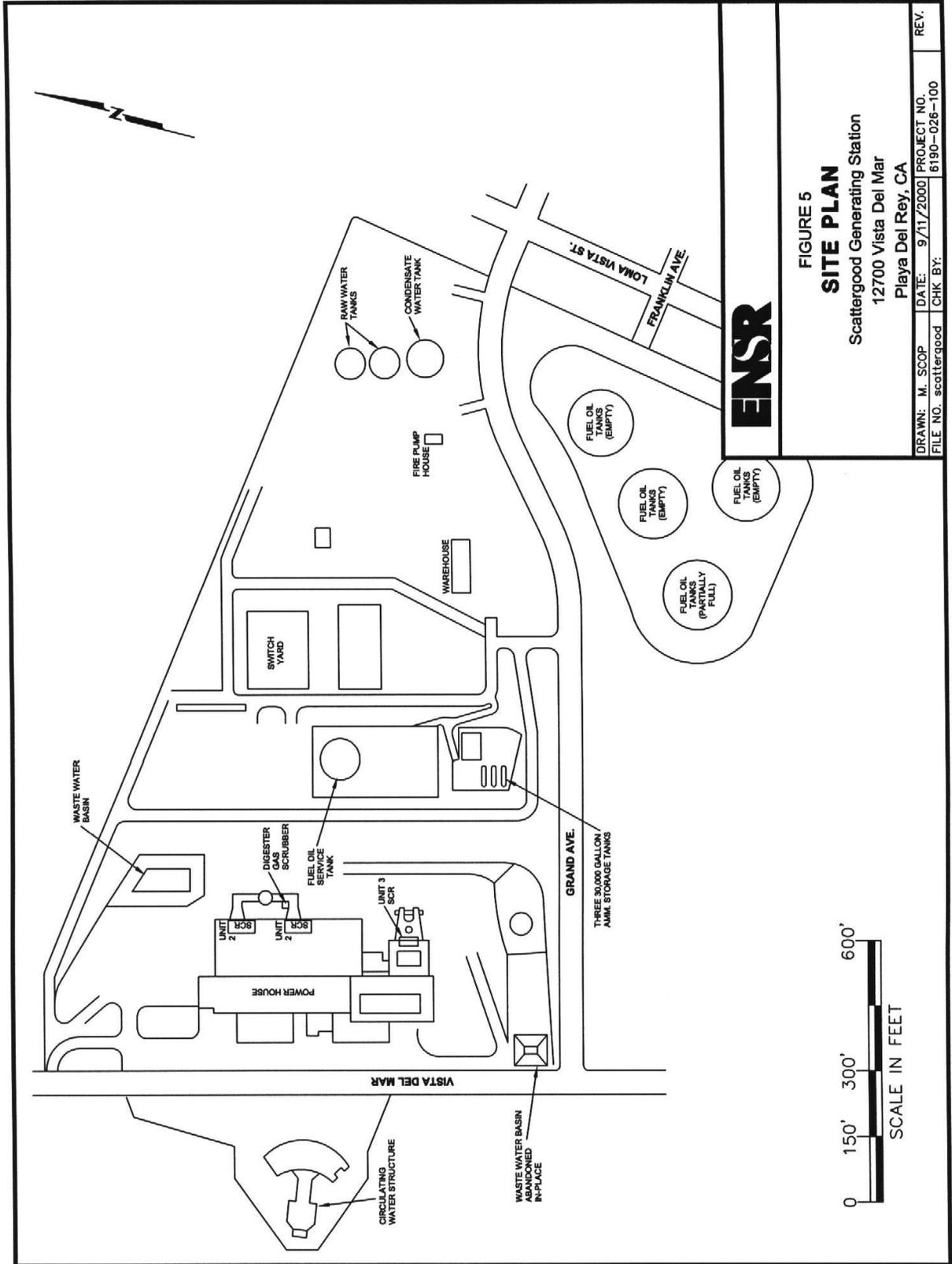


**FIGURE 3**  
**SITE LOCATION MAP**

Valley Generating Station  
 9430 San Fernando Road  
 Los Angeles, CA

Drawn by: M. Scop	Date: 9/25/2000	Project Number 6190-026-100
Figure Name: 6190026D2.dsf	Checked by:	





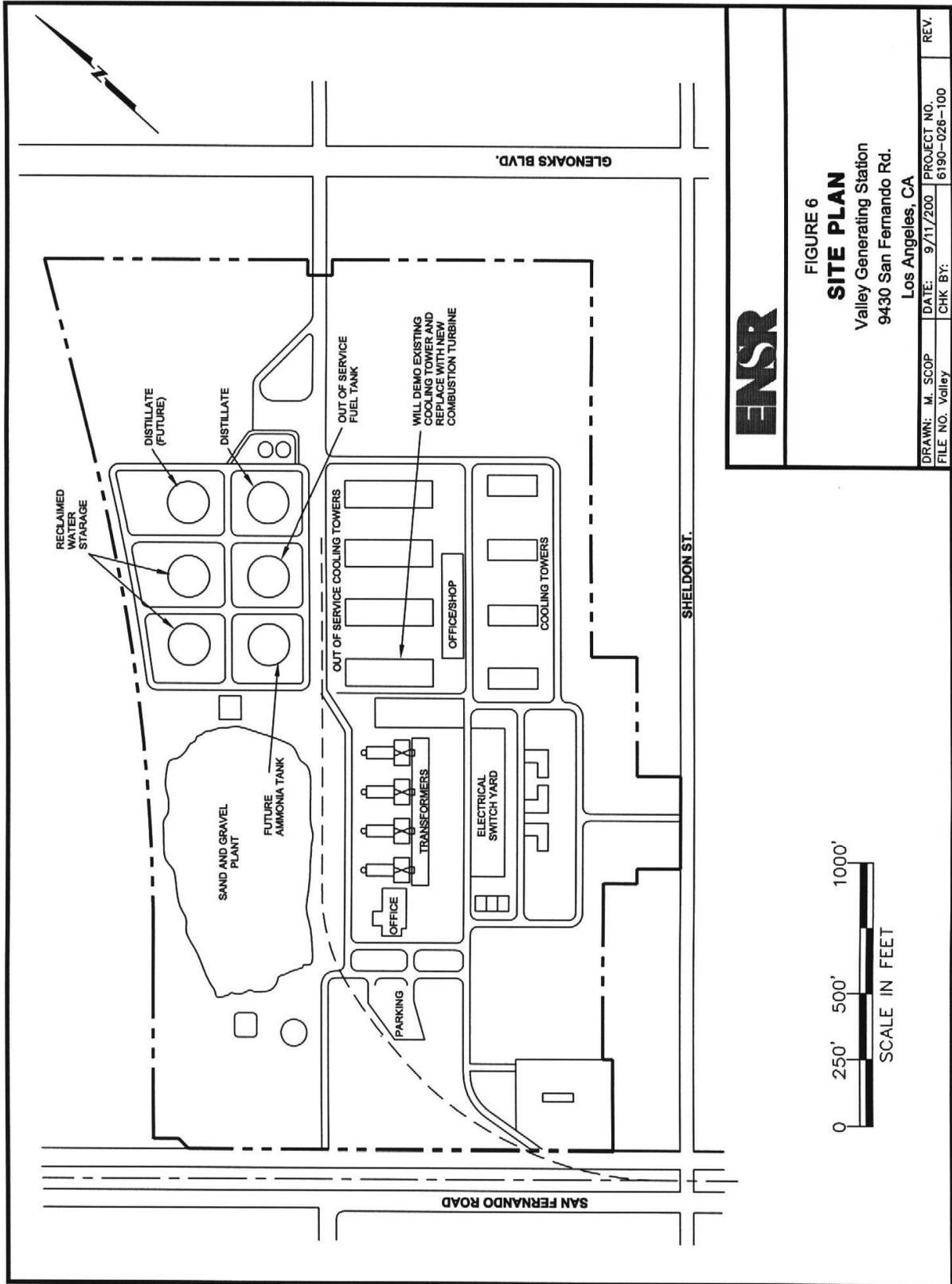
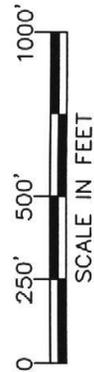


FIGURE 6

**SITE PLAN**

Valley Generating Station  
9430 San Fernando Rd.  
Los Angeles, CA

DRAWN: M. SCOP	DATE: 9/11/200	PROJECT NO. 6190-026-100	REV.
FILE NO. Valley	CHK BY:		



## **CHAPTER 2**

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### **PROJECT DESCRIPTION**

**Proposed Project**

**Permits and Approvals**

**Construction Schedule**

**Operation**

**Project Termination and Decommissioning**

## 2.1 PROPOSED PROJECT

The proposed activities associated with the proposed project for each facility are described separately in the following subsections.

### 2.1.1 Harbor Generating Station

As mentioned previously, LADWP is proposing to install and operate five 47-MW natural gas fired simple cycle peaking CTs at the HGS. In addition to the CTs, associated SCRs and ancillary equipment to control various combustion emissions will be installed. The SCR process uses a catalyst to facilitate a reaction between  $\text{NO}_x$  and an injected reagent, aqueous ammonia, to reduce  $\text{NO}_x$  emissions and produce nitrogen and water.

The CTs and ancillary equipment will be installed in an area that formerly served as a tank farm. Existing tanks that currently occupy space in the tank farm area will be decommissioned and removed prior to the installation of the five new CTs, SCRs, and ancillary equipment. If during the decommissioning and removal process of the existing tanks hydrocarbon-impacted soils are encountered, remediation procedures to properly treat the impacted soils will be conducted prior to the installation of the new CTs.

The project site will also include either installation of a 30,000-gallon aqueous ammonia storage tank or the construction of a pipeline to transport the ammonia from an existing on-site tank to the new SCRs

### Power Generating Equipment

The CTs that will be installed are envisioned to be the equivalent to General Electric's (GE) LM6000. According to GE's product specifications, the LM6000 is a two-shaft gas turbine with an output speed of 3,600 revolutions per minute and a simple cycle heat rate of approximately 8,300 British thermal units per kilowatt-hour.

The CTs will have built-in pollution controls that will preliminarily reduce  $\text{NO}_x$  emissions prior to any add-on controls such as SCR. These built in-controls could consist of one or more of the following: water injection, steam injection, or a low- $\text{NO}_x$  combustor.

The CTs will be designed to meet super peak power needs, those times when additional power is needed at a moment's notice due to hot temperatures or interruptions of power from other sources. The CTs will be able to be turned on literally by the "flip-of-a-switch," a benefit over traditional utility boilers that need hours to come on-line and begin delivering power. These CTs will have the added advantage of being able to instantly supply power to Los Angeles area businesses and

residents instead of using dirtier in-basin power or power from outlying generation stations.

## **SCR**

SCR is a post-combustion control technology capable of NO<sub>x</sub> reductions in excess of 90 percent. The SCR process anticipated to be used at the HGS will use a catalyst with an optimal temperature window of approximately 350° to 400° Centigrade to facilitate a heterogeneous reaction between NO<sub>x</sub> and ammonia (NH<sub>3</sub>) to produce nitrogen and water. A typical SCR system is comprised of an ammonia storage tank, vaporization and injection equipment for ammonia, a booster fan for the flue gas, an SCR reactor with catalyst, and instrumentation and control equipment.

The catalyst planned for use in the HGS' SCRs associated with the five new CTs are expected to be vanadium based, on a titanium support matrix. Vanadium catalysts are preferred for their high activity, insensitivity to sulfur in the exhaust, and useful life span.

### **Ammonia Handling and Storage**

The proposed project will use aqueous ammonia (ammonium hydroxide at 29.5 percent concentration by weight) as the SCR reductant. Aqueous ammonia has been selected primarily for its ease of use and its ability to be safely transported and handled onsite at the HGS. The ammonia will either be stored in a new 30,000-gallon storage tank or be transported via pipeline from an existing onsite tank to the new SCRs. The ammonia will be delivered to HGS via tanker truck.

The aqueous ammonia will be atomized with air and vaporized with hot flue gas. The ammonia/air mixture is blended with a static mixer and injected into the flue gas ahead of the catalyst bed via an injection grid. Ammonia is injected on a 1:1 molar ratio with NO<sub>x</sub>.

### **2.1.2 Scattergood Generating Station**

LADWP proposes to install SCR systems on three existing utility boilers at the SGS. As described above, SCR is a post-combustion NO<sub>x</sub> control technology capable of NO<sub>x</sub> reductions in excess of 90 percent. As there is no existing storage capacity for the aqueous ammonia required by SCR technology, the project will also include the installation of three 30,000-gallon aboveground storage tanks on the SGS site. In addition, to make room for the SCR equipment, an existing exhaust stack may be relocated. For more information concerning the SCR system and ammonia handling and storage to be installed at SGS, see the relevant section above under the HGS discussion.

### **2.1.3 Valley Generating Station**

The proposed project includes the installation of one 47-MW CT with SCR at the VGS. The turbine will be similar in design and operation to the turbines described above in section 2.1.1. As there is currently insufficient ammonia storage capacity at the facility, the project also includes the installation of one 30,000-gallon aqueous ammonia storage tank. For more information concerning the SCR system and ammonia handling and storage to be installed at the VGS, see the relevant section above under the HGS discussion.

## **2.2 PERMITS AND APPROVALS**

The proposed project will require a number of permits and approvals before construction can commence. The majority of the permits and approvals will include SCAQMD air permits (e.g., permits for the new CTs and ammonia tanks and permit changes to existing units to install SCRs). While no changes in land use designations are expected for the project sites, approvals (e.g., modifications to conditional use permits) will be required from the City of Los Angeles for all project sites, changes in ocean discharge permits for HGS and SGS may be required from the California Coastal Commission, and a change in the wastewater discharge permit for HGS may be required from the Regional Water Quality Board. These public agencies will act as responsible agencies for the proposed project<sup>1</sup>.

## **2.3 CONSTRUCTION**

Construction of the proposed project is scheduled to begin early 2001 and be completed in the summer of 2001 at HGS and VGS. Construction at the SGS is not scheduled to be complete until early 2002. Construction activities are anticipated to take place five days per week, Monday through Friday, from 6:00 a.m. to 5:00 p.m. However, night and/or weekend shifts may be required to maintain the construction schedule.

## **2.4 OPERATION**

The proposed project will require no additional workers for operations. The project will operate whenever the new CTs generate electric power, up to 24 hours per day for 365 days per year at HGS, VGS, and the SCRs full-time at SGS.

## **2.5 PROJECT TERMINATION AND DECOMMISSIONING**

The estimated life of the proposed project additions and modifications is over 30

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<sup>1</sup> “ ‘Responsible Agency’ means a public agency which proposes to approve a project for which a lead agency is preparing an EIR. . . ” (CEQA Guidelines §15381).

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years. The appropriate equipment may then be shut down and/or decommissioned, modified, and/or expanded in accordance with applicable regulations and market conditions prevailing at the time of termination. The form of decommissioning would likely involve a combination of salvage or disposal at an approved landfill, as well as site restoration.

## **2.6 PROJECT ALTERNATIVES**

The Draft EIR will discuss and compare alternatives to the proposed project as required by CEQA Guidelines §15126.6. Alternatives must include realistic strategies for attaining the basic objectives of the proposed project and provide a means for evaluating the comparative merits of each alternative. In addition, the range of alternatives must be sufficient to permit a reasoned choice, it need not include every conceivable project alternative. The key issue is whether the selection and discussion of alternatives fosters informed decision making and public participation. A CEQA document need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.

Alternatives will be developed based in part on the major components of the proposed project. The rationale for selecting alternatives rests on CEQA's requirement to present "realistic" alternatives; that is, alternatives that can actually be implemented. CEQA also requires an evaluation of a "No Project Alternative." Project alternatives may also be based on suggested alternatives received during the 30-day public comment period for this IS.

## **CHAPTER 3**

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### **ENVIRONMENTAL CHECKLIST**

### 3.1 INTRODUCTION

The environmental checklist provides a standard evaluation tool to identify a project's adverse environmental impacts. This checklist identifies and evaluates potential adverse environmental impacts that may be created by the proposed project.

### 3.2 GENERAL INFORMATION

Lead Agency Name:	South Coast Air Quality Management District 21865 E. Copley Drive
Lead Agency Address:	Diamond Bar, CA 91765
Contact Person:	Darren W. Stroud
Contact Phone Number:	(909) 396-2526
Project Sponsor's Name:	Los Department of Water and Power 111 North Hope Street
Project Sponsor's Address:	Los Angeles, CA 90012-2694
General Plan Designation:	HGS: Heavy Industrial SGS: Heavy Industrial VGS: Public Facilities
Zoning:	HGS: M3-1D and P SGS: M3 and P VGS: [Q]PF-1XL and [Q]PF-1XL-G (Public Facilities)
Description of Project:	LADWP is proposing to: install five 47-MW CTs, associated SCRs, and ancillary equipment at the HGS; install SCR on three existing utility boilers at the SGS; and install one 47-MW CT, associated SCR, and ancillary equipment at the VGS.
Surrounding Land Uses and Setting:	HGS is located adjacent to the Port of Los Angeles in a primarily industrial area. SGS is located in the City of Los Angeles (Playa Del Rey) adjacent to the Hyperion Wastewater Treatment Plant and the Chevron El Segundo Refinery. VGS is located in the City of Los Angeles (Sun Valley). See Chapter 1, Section 1.3 for additional information.
Other Public Agencies Whose Approval is Required:	Various local agencies where the project sites are located including the City of Los Angeles and the California Coastal Commission.

### 3.3 POTENTIALLY SIGNIFICANT IMPACT AREAS

The following environmental impact areas were determine to be affected by the proposed project. As indicated by the checklist on the following pages, environmental topics marked with an "✓" may be adversely affected by the proposed project. An explanation relative to the determination of impacts can be found following the checklist for each area.

- |   |   |  |
|---|---|--|
| <input type="checkbox"/> Aesthetics                       | <input type="checkbox"/> Agriculture Resources                    | <input checked="" type="checkbox"/> Air Quality                        |
| <input checked="" type="checkbox"/> Biological Resources  | <input type="checkbox"/> Cultural Resources                       | <input checked="" type="checkbox"/> Energy                             |
| <input checked="" type="checkbox"/> Geology Soils         | <input checked="" type="checkbox"/> Hazards & Hazardous Materials | <input checked="" type="checkbox"/> Hydrology/Water Quality            |
| <input type="checkbox"/> Land Use/Planning                | <input type="checkbox"/> Mineral Resources                        | <input checked="" type="checkbox"/> Noise                              |
| <input type="checkbox"/> Population/Housing               | <input type="checkbox"/> Public Services                          | <input type="checkbox"/> Recreation                                    |
| <input checked="" type="checkbox"/> Solid/Hazardous Waste | <input checked="" type="checkbox"/> Transportation/Traffic        | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

### 3.4 DETERMINATION

On the basis of this initial evaluation:

- I find the proposed project COULD NOT have a significant effect on the environment, and that a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be significant effects in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect(s) on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Steve Smith, Ph.D.  
Program Supervisor

### 3.5 ENVIRONMENTAL CHECKLIST AND DISCUSSION

Issues identified that may result in significant impacts will be fully evaluated in the EIR for the proposed project. It should be noted that in the following analysis, the term “project” refers to all three project sites.

	<b>Potentially Significant Impact</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>I. AESTHETICS.</b> Would the project:			
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

I.a) The HGS is located in the Port of Los Angeles in a highly industrialized area. The predominant adjacent land uses include container storage, petroleum storage, bulk handling of petroleum coke, coal sulfur, etc., and light industry. Aboveground fuel storage tanks will be decommissioned and the turbines will be installed in the area of the former tank farm. The installation of the CTs will require additional exhaust stacks which are expected to be approximately 100 feet in height.

The SGS is located in an area of mixed uses, with industrial, recreation, residential, and commercial uses nearby. The predominant adjacent land uses include the Chevron El Segundo Refinery, the Hyperion Wastewater Treatment Plant, a residential neighborhood, and the Pacific Ocean. The SCR equipment will be installed on three existing boilers and the aboveground storage tanks will be constructed adjacent to existing to existing equipment.

The VGS is located in an area of mixed uses, with industrial, residential and commercial uses nearby. The predominant adjacent land uses include a sand and gravel plant, light industry, an emergency medical clinic, a hospital, and two motels. The CT will be installed at the location of a former cooling tower and the aboveground storage tank will be constructed at the location of a former demineralized water storage tank.

Modifications at each of the facilities are expected to blend with the existing facilities with no significant negative visual resource affects.

I.b) Dockweiler State Beach and Manhattan Beach are located adjacent to the west of the SGS. The modifications to the equipment at the facility are not expected to negatively affect visual resources, as the proposed modifications are located entirely within the boundaries of the existing facility and the new equipment is expected to blend with the existing industrial setting. Scenic resources do not exist near the area of the HGS or the VGS.

I.c) Proposed equipment modifications and construction would be conducted within the confines of the affected LADWP generating stations. Because the structures being added are similar to existing facility components, the project is not expected to result in a significant impact to visual resources.

I.d) Permanent light sources in addition to existing lighting sources, will be installed at the affected LADWP generating stations. However, due to the industrial nature of the areas, the additional lighting is not expected to result in significant impacts to day or nighttime views. Construction activities are not anticipated to require additional lighting because activities are scheduled to take place during daylight hours. However, if the construction schedule is such that nighttime activities are necessary, temporary lighting may be required. If necessary, additional temporary lighting is expected to be short-term and often not discernible from the existing lighting. Therefore, no significant impacts associated with light and glare during construction are anticipated as part of this project.

Based upon the above considerations, significant aesthetics impacts at the HGS, SGS, and VGS are not expected and will not be further analyzed in the draft EIR.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
<b>II. AGRICULTURE RESOURCES.</b> Would the project:			
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

II.a, b and c) The proposed project includes improvements and modifications to three existing industrial facilities. No agricultural resources are present on or in close proximity to the three generating station sites. Therefore, the project would not convert farmland (as defined in item a above) to non-agricultural use or involve other changes in the existing environment that would convert farmland to non-agricultural use.

Additionally, the sites are not zoned for agricultural use. Therefore, the project would not conflict with existing agricultural zone or Williamson Act contracts. Based on these considerations, significant agricultural resources impacts at the HGS, SGS, and VGS are not anticipated and will not be further analyzed in the draft EIR.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
<b>III. AIR QUALITY.</b> Would the project:			
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) 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 (including releasing emissions that exceed quantitative thresholds for ozone precursors)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Diminish an existing air quality rule or future compliance requirement resulting in a significant increase in air pollutant(s)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

III.a, b, and c) As mentioned previously, the project involves the installation of CTs, associated SCRs and ancillary equipment (ammonia storage tanks, ammonia delivery systems, etc.). The installation of this equipment at the various LADWP generating stations will involve the removal of existing storage tanks, the cleaning up or removal of any contaminated soil, site preparation, and equipment erection. Accordingly, these construction-related activities could result in short-term air quality impacts. Therefore, the draft EIR will analyze whether emissions generated during construction-related activities (e.g., operation of on-site heavy-duty construction equipment, on-site worker activities, worker commute trips, construction material

transport trips, and the potential removal and/or cleaning up of contaminated soil) contribute to potential significant adverse air quality impacts.

In the context of operational-related emissions, although the new CTs at HGS and VGS will be equipped with both pre- and post-combustion air pollution controls (e.g., SCR, carbon monoxide (CO) catalyst, etc.) to comply with the SCAQMD's New Source Review (NSR) Best Available Control Technology (BACT) requirements, the CTs will still emit combustion contaminants such as NO<sub>x</sub>, CO, SO<sub>x</sub>, particulate matter (PM), and volatile organic compounds (VOCs). The draft EIR will analyze whether the combustion emissions generated from the CTs at HGS and VGS have the potential to create potential significant adverse air quality impacts.

Additionally, since the SCR units require the use of ammonia as a reductant to reduce NO<sub>x</sub> emissions, some of the ammonia slips through the SCR system and to form PM in the atmosphere. The draft EIR will analyze whether ammonia slippage associated with the operation of SCRs on the CTs at HGS and VGS, as well as the existing units at SGS could result in potential significant adverse air quality impacts. Also, in the context of ammonia usage, the draft EIR will analyze the mobile source emissions associated with tanker trucks delivering ammonia to the three LADWP generating stations for use in the newly installed SCRs.

III.d) Emissions from the project may potentially expose sensitive receptors to adverse health affects. A health risk assessment based on the estimated emissions will be conducted to determine the net effect of the proposed project on human health in the vicinity of the three generating stations. The results of the health risk assessment will be included in the draft EIR.

III.e) Ammonia potentially has an objectionable odor. The ground level ammonia concentrations will be estimated and compared to the odor threshold for this chemical as well as background odor concentrations in the vicinity of the three generating stations. The results will be presented in the draft EIR.

III.f) The proposed project will be required to comply with all relevant source specific rules for new equipment (SCAQMD Regulation XI), all relevant prohibitory rules (SCAQMD Regulation IV), and all rules governing the installation of new, modified or relocated equipment (Regulation XIII, which includes requirements for NSR, offsets, and BACT; Regulation XX-RECLAIM; and Rule 1401-New Source Review of Toxic Air Contaminants). It is not expected that an existing air quality rule or a future compliance requirement will be diminished. The SCAQMD will not issue air quality permits for the proposed project unless it is demonstrated that the permittable units of the project comply with all SCAQMD rules and regulations. Therefore, this issue will not be further evaluated in the draft EIR.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
<b>IV. BIOLOGICAL RESOURCES.</b> Would the project:			
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by §404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflicting with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<b>Potentially Significant Impact</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>IV. BIOLOGICAL RESOURCES.</b> Would the project:			
f) Conflict with the provisions of an adopted Habitat Conservation plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

IV.a, b, c, and d) The proposed project will be located within the boundaries of existing power generating stations which have already been greatly disturbed as a result of the original construction of each facility. These areas do not support riparian habitat, federally protected wetlands, or migratory corridors. According to the California Natural Diversity Database (June 15, 2000), no special status plants, animals or natural communities are found in proximity to the HGS or VGS. However, due to the proximity of the SGS to the coastal environment, the potential impacts of the proposed project at that location will be evaluated in the draft EIR.

IV.e and f) The proposed project will not conflict with local policies or ordinances protecting biological resources nor local, regional, or state conservation plans. The project will not conflict with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or any other habitat conservation plan. Therefore, these impact areas will not be further assessed in the draft EIR.

	<b>Potentially Significant Impact</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>V. CULTURAL RESOURCES.</b> Would the project:			
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<b>Potentially Significant Impact</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>V. CULTURAL RESOURCES.</b> Would the project:			
b) Cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Disturb any human remains, including those interred outside a formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

V.a) Because construction is confined within the footprint of existing power generating stations, no impacts to historical resources will occur as a result of this project.

V.b, c, and d) Constructing new storage tanks, turbines, SCRs, and other associated equipment will require disturbance of previously disturbed areas. Furthermore, past projects conducted at the project sites have not revealed any archaeological or paleontological resources. Therefore, potential impacts to archaeological, paleontological, and human remains are not expected.

Based upon these considerations, significant cultural resources impacts are not expected at the HGS, SGS, or VGS, and will not be further analyzed in the draft EIR.

	Potentially Significant Impact	Less Than Significant Impact	No Impact
<b>VI. ENERGY.</b> Would the project:			
a) Conflict with adopted energy conservation plans?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the need for new or substantially altered power or natural gas utility systems?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Create any significant effects on local or regional energy supplies and on requirements for additional energy?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create any significant effects on peak and base period demands for electricity and other forms of energy?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Comply with existing energy standards?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

VI.a and e) LADWP is expected to comply with existing energy conservation standards to minimize operating costs. The proposed project is therefore not expected to conflict with energy conservation plans. Accordingly, this impact area will not be further analyzed in the draft EIR.

VI.b) The project will result in a net increase in the amount of natural gas consumed by the HGS and VGS. However, LADWP already holds large portions of firm capacity rights on interstate gas pipelines (California Gas Report, CEC 1998) and the infrastructure and natural gas supply is ample to supply this increased demand. As new CTs are not being constructed at SGS, a net increase in natural gas usage is not expected. Therefore, the project will not require the need for a new or significantly modified natural gas distribution system. Accordingly, this impact area will not be further analyzed in the draft EIR.

VI.c) Because of its clean burning characteristics, natural gas-powered technology is considered to be BACT for most combustion sources in the district and, therefore, it

is required by the SCAQMD to be the primary fuel for most combustion sources. In the utility electric generation sector in the basin, natural gas is used as the primary combustion fuel in power generating equipment such as utility boilers and gas turbines.

Although natural gas (consisting primarily of methane) can be synthetically produced, current supplies are obtained primarily from naturally occurring subsurface reservoirs. The CEC indicates that natural gas supplies to California will remain plentiful for the next several decades. The total resource base (gas recoverable with today's technology) for the lower 48 states is estimated to be about 975 trillion cubic feet (TCF), enough to continue current production levels for more than 50 years.

California is the second largest consumer of natural gas in the nation, ranking behind Texas (1998 Energy Baseline Outlook, CEC 1998). Four producing regions supply California with natural gas. Three of them -- the Southwest US, the Rocky Mountains, and Canada -- provide approximately 85 percent of all gas used in California. The remainder is produced inside California. The total supply to meet California consumption is expected to increase from 5.9 billion cubic feet (BCF) per day in the 1994 base year to 7.8 BCF per day by 2019 (1999 Fuels Report, CEC 1999). The California's Energy Commission's projections of natural gas supply to Basin is 1.14 TCF in 2000 and 1.54 TCF in 2015.

Although five new CTS will be installed at HGS and one new CT installed at VGS, due to a more efficient operational mix of units (e.g., new CTs in lieu of older less efficient utility boilers) at these project sites, the incremental increase in natural gas usage associated with the new CTs should be negligible. Based on projected natural gas supplies as discussed above, a sufficient supply of natural gas should be available to meet any small incremental demand created at these project sites.

The SGS will receive only SCR units on existing equipment in conjunction with this project, and consequently, there will be no net increase in natural gas usage as a result of the proposed modifications.

The project will result in a minor increase in the electrical consumption at each facility due to the operation of blowers and the pumps associated with the SCR units. This will be more than offset by the new power generated by the project.

However, incremental gasoline and diesel usage will occur during construction activities (e.g., operation of construction equipment, material delivery trucks, potential remediation activities, and worker commute vehicles). Accordingly, the draft EIR will further analyze the potential gasoline and diesel demand associated with the proposed project's construction-related activities.

VI.d) Peak electricity demand, expressed in megawatts, measures the highest instantaneous consumption of electricity integrated over an hour of time during a calendar year. Coincident peak electricity demand estimates for the planning areas within the SCAQMD’s jurisdiction are expected to increase approximately 1.2 percent per year, from 24,116 MW in 1997 to 27,109 MW in 2007 (1998 Baseline Energy Outlook, CEC 1998). The proposed project involves the installation of five 47-MW simple-cycle CTs at HGS and one 47- MW simple cycle-CT at the VGS specifically intended to alleviate the power shortages experienced during peak hours. Therefore, the proposed project will improve the electrical energy supply to the local, regional, and statewide power grid. Therefore, this impact area will not be further analyzed in the draft EIR.

	<b>Potentially Significant Impact</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>VII. GEOLOGY AND SOILS.</b> Would the project:			
a.) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:			
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact	No Impact
<b>VII. GEOLOGY AND SOILS.</b> Would the project:			
c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

VII.a) Southern California is an area known for seismic activity. The construction and installation of various project elements will conform to the Uniform Building Code and other applicable codes. Where appropriate, the project design will be reviewed and approved by civil or structural engineer(s) with training in design methods to prevent damage from a possible earthquake. The potential for impacts from seismic shaking or ground rupture from any known earthquake fault will be addressed in the EIR. If potential significant impacts are found, appropriate feasible mitigation measures will be identified and implemented.

VII.b) Minimal grading is planned and, therefore, the proposed project is not expected to result in substantial soil erosion or the loss of topsoil. Therefore, further analysis of this impact issue will not be presented in the draft EIR.

VII.c) The soil types present at the SGS and VGS are not particularly susceptible to expansion or liquefaction and are not prone to landslides. However, according to the California Seismic Hazard Zones Map: Torrance Quadrangle, the HGS is located in an area where historic occurrence of liquefaction, or local geological, geotechnical and groundwater conditions indicate a potential for permanent ground displacement. Therefore, this issue will be further assessed in the draft EIR for the HGS.

No unique geologic features are located on the three power generating sites. However, subsidence has been an issue in the past in the Wilmington area where the HGS is located. Because salt water is being reinjected in place of oil and gas extracted from reservoirs beneath the Harbor area, subsidence has not been a problem for recent projects and is not expected to be a problem during construction or operation of the proposed project at the HGS. Subsidence is not expected to occur at the SGS or VGS. Accordingly, this impact issue will not be further examined in the draft EIR.

VII.d and e) The project improvements are primarily modifications at existing power generating stations, and are not expected to be adversely affected by expansive soils or and does not include installation of alternative wastewater disposal systems. Therefore, this impact issue will not be further analyzed in the draft EIR.

	<b>Potentially Significant Impact</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>VIII. HAZARDS AND HAZARDOUS MATERIALS.</b> Would the project:			
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions, or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact	No Impact
<b>VIII. HAZARDS AND HAZARDOUS MATERIALS.</b> Would the project:			
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Significantly increased fire hazard in areas with flammable materials?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

VIII.a) As previously mentioned, the proposed project at the HGS includes the addition of five 47-MW CTs with SCRs utilizing aqueous ammonia injection for NO<sub>x</sub> control. Aqueous ammonia is currently stored on site in a 30,000-gallon tank. The SCR systems associated with the five new CTs would require additional ammonia, which will be piped to the SCRs from an existing aboveground aqueous ammonia storage tank (29.9 percent concentration by volume) or a new 30,000-gallon storage tank will be installed. For SGS and VGS, new 30,000-gallon storage tanks will be constructed onsite.

The increased ammonia supply for HGS, SGS, and VGS is expected to be replenished on a weekly basis by one tanker truck delivering 5,000 gallons of aqueous ammonia. As a result, the transport and use of the additional ammonia at the generating stations will create an incremental risk. The magnitude and frequency of a catastrophic release due to a tanker truck accident due to the transport and use of aqueous ammonia will be thoroughly analyzed in the draft EIR.

VIII.b) With regard to upset and accident situations associated with ammonia storage, the new tanks at the generating stations would create potential hazards impacts if a tank were to lose its contents due to a catastrophic release or accident. Structural failure, accidental damage, external events such as earthquakes, or operational mishaps during filling can cause spills. A containment dike to restrict the spill area and reduce ammonia vapors in the event of a leak or catastrophic tank failure will surround each new tank. The tanks and/or pipeline would be subject to external events, such as earthquakes; therefore, the equipment will be constructed to current seismic code specifications. The frequency and magnitude of various ammonia release scenarios associated with new aqueous ammonia storage tanks and/or the pipeline will be evaluated in the draft EIR.

It should be noted that human health effects associated with ammonia slippage from the installed SCRs at HGS, SGS, and VGS will be addressed in the Air Quality section of the draft EIR.

VIII.c) Although none of the facilities are located within one-quarter mile of an existing or proposed school, there is a potential that routes taken by tanker trucks delivering ammonia to the project sites could pass within one-quarter mile of a school. If an accident occurred and an ammonia tanker truck released its contents, a school may be adversely affected. The magnitude and frequency of such a scenario will be further evaluated in the draft EIR.

VIII.d) The affected power generating stations are on the Resources Conservation and Recovery Information System (Government Code § 65962.5) database because the sites are large-quantity generators of hazardous waste. However, the sites are not on a list of known contaminated sites. Hazardous wastes from these stations are managed in accordance with applicable federal, state, and local rules and regulations. The types of waste expected to be generated from the proposed project will consist primarily of spent catalyst, which is not expected to present a significant risk to human health or the environment. The catalyst will be disposed/recycled at an approved facility. Accordingly, significant hazards impacts from the disposal of hazardous materials are not expected, and will not be further analyzed in the draft EIR. This conclusion is consistent with the conclusion regarding the disposal of spent catalysts in the RECLAIM FEA.

VIII.e and f) The HGS and VGS are not located within two miles of a public or private airport. However, the SGS is located approximately two miles northwest of Los Angeles International Airport (LAX). Therefore, this project sites' activities will be evaluated in the draft EIR to determine if they conflict with the current activities at LAX.

VIII.g and h) The proposed project is expected to have less than a significant hazards impact concerning the impairing of or physically interfering with adopted emergency response plan or emergency evaluation plans. Procedures for emergency response are provided to all LADWP employees along with training guidelines in the use of personal protective equipment. These procedures and guidelines will be updated as necessary to account for the installation of new equipment. All construction and operation personnel associated with the proposed project would receive safety-training in accordance with LADWP procedures and guidelines. Additionally, the proposed project sites are located in an urban area and would not impact wildlands. Based upon the above considerations, this impact issue will not be further analyzed in the draft EIR.

VIII.i) The new CTs at HGS and VGS will be fueled by natural gas. No new CTs are being installed at SGS. Natural gas for the CTs will be supplied from existing pipelines and no additional pipeline capacity is required. The potential impact of a pipeline accident would not incrementally increase the facilities' fire hazard risks. The severity of potential fires or explosions due to a failure of the pipeline would extend out to about the same distance from the main pipeline, from each turbine or the lines connecting to the turbines, depending on the location of the accident. Fire suppression measures that currently exist at the facilities will be expanded to accommodate the new turbines. These impacts are considered less than significant and will not be evaluated in the draft EIR.

<b>Potentially Significant Impact</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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**IX. HYDROLOGY AND WATER QUALITY.**

Would the project:

- |   |                                     |                          |                          |
|---|-------------------------------------|--------------------------|--------------------------|
| a) Violate any water quality standards or waste discharge requirements? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|---|-------------------------------------|--------------------------|--------------------------|

	Potentially Significant Impact	Less Than Significant Impact	No Impact
<b>IX. HYDROLOGY AND WATER QUALITY.</b>			
Would the project:			
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact	No Impact
<b>IX. HYDROLOGY AND WATER QUALITY.</b>			
Would the project:			
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
k) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
l) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
m) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
n) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>Potentially Significant Impact</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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**IX. HYDROLOGY AND WATER QUALITY.**

Would the project:

- |  |                                     |                          |                          |
|--|-------------------------------------|--------------------------|--------------------------|
| o) Require in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--|-------------------------------------|--------------------------|--------------------------|

IX.a and f) Because the project will include the construction of new ammonia storage tanks at SGS and VGS and either a new tank or a pipeline at HGS, surrounding bodies of water both above and below ground could be adversely affected if a leak or rupture occurs. Accordingly, potential water quality impacts associated with this scenario will be examined in the draft EIR. In addition, the project at the HGS may include the utilization of an existing once-through circulating ocean water system. The draft EIR will assess potential impacts associated with the use of this system.

IX.b and n) The proposed project will require water for both construction (e.g., dust suppression) and operation (e.g., cooling, NO<sub>x</sub> control, and wash systems). Therefore, the affects associated with additional water usage will be addressed in the draft EIR.

IX.c, d, and e) As the proposed project would be undertaken at existing power generating stations and involves the construction of a limited number of surface features, no significant changes to stormwater runoff, drainage patterns, groundwater characteristics or flow would result. Therefore, this impact issue is expected to be insignificant, and will not be further evaluated in the draft EIR.

IX.g, h, i, and j) Based upon site topographies and/or site elevations in relation to sea level, the anticipated modifications will not result in an increased risk of flood, seich, tsunami, or mud flow hazards at the project sites. Accordingly, this impact issue will not be further evaluated in the draft EIR.

IX.k and o) The proposed project may result in additional wastewater discharge from cooling operations, cleaning operations and NO<sub>x</sub> control. As a result, public sewers

or publicly owned treatment works may be adversely affected. Therefore, this impact issue will be further evaluated in the draft EIR.

IX.l) The proposed facility modifications are not expected to increase stormwater discharges at the project sites. Therefore, construction of new stormwater drainage facilities or expansion of existing facilities will not be required and this issue will not be further evaluated in the draft EIR.

IX.m) Even though it is expected that no new wastewater treatment facilities or modifications to existing facilities will be required for the proposed project and no significant water quality impacts are anticipated, this impact issue will be further assessed in the draft EIR.

	<b>Potentially Significant Impact</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>X. LAND USE AND PLANNING.</b> Would the project:			
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with any applicable habitat conservation or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

X.a and c) No new property will be acquired for the project at any of the three project sites. As a result, there will be no impacts to established communities. Additionally, the proposed project is not expected to conflict with local habitat conservation plans or natural community conversation plans, as the project sites are

previously developed industrial facilities and project activities would occur completely onsite of the project sites.

X.b) The land use and surrounding areas at the HGS are designated as Heavy Industrial in the Wilmington Community Plan. The project site and surrounding areas are currently zoned as M3-1D and P. This zoning designation allows for the current and future similar uses as well as additions and facility modifications consistent with the proposed project. Additionally, because of the M3-1D and P zoning and land use designation, the facility modifications at this project site would not conflict with the community plan or the current zoning ordinance. As the project includes modifications to an existing facility, conflicts with a coastal plan are not expected.

The SGS is designated as heavy Industrial in the Westchester-Playa Del Rey Community Plan. The proposed project site is currently zoned as M-3 and P. This zoning allows current and future uses as well as additions and facility modifications. Because of the M-3 zoning and land use designation, the facility modifications at this project site would not conflict with the community plan or the current zoning ordinance. As the project includes modifications to an existing facility, conflicts with a coastal plan are not expected.

The VGS is designated as “Public Facilities” in the Sun Valley Community Plan. Because the southwest portion of the property is subject to conditional use provisions, a site plan review will be required prior to project implementation.

Because the proposed project is expected to occur within the existing footprint of existing facilities, it is not expected to conflict with a habitat conservation or natural community conservation plan or divide an established community.

Based on the above considerations, no significant project-related impacts to land use and planning are expected to occur. Therefore, this impact area will not be further analyzed in the draft EIR.

	<b>Potentially Significant Impact</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>XI. MINERAL RESOURCES.</b> Would the project:			
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

XI.a and b) The project modifications would be constructed on land within existing industrial uses. There are no known mineral resources on the three affected project sites. Therefore, the project would not result in the loss of a known mineral resource that would be of value to the region and residents of California. Similarly, because there are no known mineral resources on the project sites, the project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.

Based upon these considerations, significant mineral resource impacts are not expected and will not be further analyzed in the draft EIR.

	<b>Potentially Significant Impact</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>XII. NOISE.</b> Would the project result in:			
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact	No Impact
<b>XII. NOISE.</b> Would the project result in:			
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

XII.a) The proposed project sites are located in existing industrial settings. Exposure of persons to or generation of excessive noise levels will be assessed in the draft EIR and compared with standards established in the local general plans, local noise ordinances, or applicable standards of other agencies (e.g., Occupational Safety and Health Administration [OSHA]).

XII.b) The proposed project is not anticipated to expose people near the project sites to or generate excessive groundborne vibration or groundborne noise levels. The construction and operation noises are anticipated to be comparable to existing activity and OSHA worker safety regulations will be in effect at the three project sites. Therefore, this impact issue will not be further examined in the draft EIR.

XII.c) A permanent increase in ambient noise levels in the project vicinity above existing levels may occur due to installation and operation of the new CTs, SCR, and associated equipment. Therefore, potential operational noise impacts will be qualitatively evaluated in the draft EIR.

XII.d) A temporary or periodic increase in ambient noise levels in the vicinities of the sites above existing levels may occur due to various construction-related activities. Therefore, potential construction noise impacts will be qualitatively evaluated in the draft EIR.

XII.e) The proposed project consists of improvements at the HGS and VGS, which are not near an existing airport. Therefore, any incremental generated noise from the proposed project at these locations would be unlikely to significantly interact with airport noise. Although the SGS is located approximately two miles south of the Los Angeles International Airport, the noise expected from the proposed project would be unlikely to significantly interact with noise generated from the airport. Thus, the proposed project is not expected to expose people residing or working within the project sites to excessive noise levels. Accordingly, this impact issue will not be further evaluated in the draft EIR.

XII.f) The proposed project sites are not located within the vicinity of a private airstrip and would not expose people residing or working in the project area to excessive noise levels. Therefore, this impact issue will not be further analyzed in the draft EIR.

	<b>Potentially Significant Impact</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>XIII. POPULATION AND HOUSING.</b> Would the project:			
a) Induce substantial growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (e.g. through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<b>Potentially Significant Impact</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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**XIII. POPULATION AND HOUSING.** Would the project:

- |   |                          |                          |                                     |
|---|--------------------------|--------------------------|-------------------------------------|
| c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|

XIII.a) The proposed project would occur within existing industrial power generating facilities located in highly urbanized areas. It is expected that the existing large labor pool in these urbanized areas would accommodate the labor requirements for the amount necessary at each construction project site because construction activities are expected to be relatively minor. Additionally, although the proposed project may require one to two additional maintenance personnel at each construction site, it is expected that the large labor pool can accommodate this negligible demand. As such, the proposed project will not result in changes in population densities or induce significant growth in population.

XIII.b and c) Because the proposed project includes improvements and modifications at existing industrial facilities, no existing houses or people will be displaced as a result of this project.

Based on these considerations, significant population and housing impacts are not expected from the proposed project. Therefore, this impact area will not be further analyzed in the draft EIR.

<b>Potentially Significant Impact</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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**XIV. PUBLIC SERVICES.** Would the proposal result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:

- |                             |                          |                                     |                                     |
|-----------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a) Fire protection?         | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Police protection?       | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| c) Schools?                 | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| d) Parks?                   | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| e) Other public facilities? | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

XIV.a and b) The role of the fire and police departments in relationship to this project is focused primarily on response to emergency situations. Although the proposed equipment requires the additional use of natural gas and ammonia, the proposed project will be installed at existing facilities in which several similar devices already exist. Therefore, the incremental impact on local fire protection services or police services is expected to be insignificant.

XIV.c) The local labor pool (e.g., workforce) is adequate to fill the short-term construction positions and long-term additional full time staff associated with this project. Therefore, it is anticipated that the local labor pool in each project site vicinity will supply any additional construction workers or full-time employees. Accordingly, since workers or employees will not be moving into the vicinities near the project sites, impacts to local schools are not anticipated.

XIV.d and e) The local workforce is adequate to fill the short-term construction and long-term additional full-time staff associated with this project. Therefore, it is anticipated that the local labor pool in the project vicinity area will supply any local additional construction workers or full-time employees. Accordingly, since workers or employees will not be moving into the areas around the project sites, impacts to local parks or other public facilities are not anticipated.

Based on these considerations, significant public services impacts are not envisioned from the proposed project and will not be further evaluated in the draft EIR.

	<b>Potentially Significant Impact</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>XV. RECREATION.</b>			
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

XV.a) The proposed project will not result in changes in population densities around the three project sites. Therefore, the proposed project will not increase the use of existing neighborhood and/or regional parks or other recreational facilities.

XV.b) The proposed project includes improvements and modifications to existing industrial power generating facilities. Therefore, the proposed project will not involve the use of recreational facilities or require the construction or expansion of recreational facilities near the three project sites.

Based on these considerations, significant recreation impacts are not expected from the proposed project, and will be not further analyzed in the draft EIR.

	<b>Potentially Significant Impact</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>XVI. SOLID/HAZARDOUS WASTE.</b> Would the project:			
a) Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Comply with federal, state, and local statutes and regulations related to solid and hazardous waste?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

XVI.a) Solid waste generation and disposal would increase during construction. The wastes would most likely consist of concrete, asphalt, wood, and metal debris. The construction debris would be disposed in an appropriate landfill or recycled. Because construction will take place on a former tank farm at the SGS, petroleum-contaminated soils may be encountered. The contaminated soil, if encountered, will be treated or disposed. If the construction/demolition material is disposed, the material would be sent to a Class II (industrial) or Class III (municipal) landfill and the estimated capacity of the 48 Class II/III landfills within the district is approximately 111,198 tons per day. As the increases in solid waste disposal related to construction/demolition activities would be small and temporary, it is not expected that the disposal of this material would present a significant impact. However, the solid waste streams will be quantified and evaluated in the draft EIR.

Operationally, over time the catalyst material used in the SCR process loses its effectiveness and must be replaced. The spent catalyst is either disposed at a Class I (hazardous waste) landfill or recycled. It is assumed that the spent catalyst will be recycled. If the catalyst can not be recycled, there are currently three Class I landfills located in California. For example, Chemical Waste Management Corporation in Kettleman City is a treatment, storage and disposal facility that has a capacity of 13 million cubic yards. At current disposal rates, this capacity would last for approximately 26 years (Turek, 1996). Hazardous wastes can also be transported to permitted facilities outside of California.

As spent catalyst is generated periodically and the catalyst will be preferentially recycled, adequate landfill capacity is available for the disposal of the material and

no significant impacts are expected. However, the volume of catalyst potentially disposed of will be quantified and evaluated in the draft EIR.

XVI.b) Wastes generated by construction activities and operations would be properly managed in accordance with federal, state, and local statutes and regulations. No significant impacts related to improper management of solid/hazardous wastes are expected as a result of this project. Therefore, this issue will not be discussed in the draft EIR.

	<b>Potentially Significant Impact</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>XVII. TRANSPORTATION/TRAFFIC.</b> Would the project:			
a) Cause an increase in traffic, which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>Potentially Significant Impact</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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**XVII. TRANSPORTATION/TRAFFIC.** Would the project:

- |   |                          |                          |                                     |
|---|--------------------------|--------------------------|-------------------------------------|
| e) Result in inadequate emergency access?   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Result in inadequate parking capacity?   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g. bus turnouts, bicycle racks)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

XVII.a) During construction, the proposed project will create a temporary increase in the number of vehicle trips to the individual project sites. As a result, this could create congestion at intersections or increase the volume to capacity ratio on roads in the vicinity of the project sites. Additionally, during the operational phase of the project, there will be additional truck trips to the facilities to deliver aqueous ammonia to be used in the SCRs. Since these changes in transportation could affect the local transportation systems, these impacts will be evaluated in the draft EIR.

XVII.b) The increase in vehicle trips associated with the project’s construction and operational phases may potentially create a change in the level of service standard at intersections in the vicinity of the project sites. Accordingly, this impact issue will be further evaluated in the draft EIR.

XVII.c) The proposed project involves the installation of equipment at existing power generating facilities. This equipment (e.g., CTs, SCRs, and ancillary equipment) will be similar in height and appearance to the existing structures at the project sites. Therefore, the proposed project is not expected to adversely affect air traffic patterns. Additionally, no increase in air traffic is expected as a result of the proposed project. Therefore, this issue will not be further analyzed in the draft EIR.

XVII.d) The proposed project involves the installation of equipment at existing power generating facilities. No offsite modifications are anticipated at SGS and VGS. However, the project at the HGS may include the installation of a pipeline

under a public thoroughfare. Therefore, impacts associated with additional hazards associated with the pipeline will be assessed in the draft EIR.

XVII.e) The proposed project will take place at existing power generating facilities with no changes expected to emergency access. Therefore, the proposed project is not expected to adversely impact emergency access in the vicinity of the project sites and will not be further evaluated in the draft EIR.

XVII.f) Additional parking in the vicinity of the proposed project sites will be required for workers during the construction phase of the project. The construction workers are expected to park within facility boundaries. Therefore, the project is not expected to result in inadequate offsite parking and this impact issue will not be further assessed in the draft EIR.

XVII.g) The proposed project will take place at existing facilities and will not result in conflicts with alternative transportation. Therefore, this impact issue will not be further evaluated in the draft EIR.

<b>Potentially Significant Impact</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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**XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.**

- |  |                                     |                          |                          |
|--|-------------------------------------|--------------------------|--------------------------|
| a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--|-------------------------------------|--------------------------|--------------------------|

<b>Potentially Significant Impact</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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**XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.**

- |   |                                     |                          |                          |
|---|-------------------------------------|--------------------------|--------------------------|
| b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

XVIII.a) Based on the analysis above, no potential impacts to cultural/historical resources are expected from the proposed project. However, due to the proximity of the SGS to the coastal environment, the project does have the potential to reduce the number or restrict the range of a rare or endangered plant or animal; therefore, these issues will be further examined in the draft EIR.

XVIII.b) The proposed project may cause cumulative impacts depending on other projects that may occur concurrently with or subsequent to the proposed project. The potential for significant cumulative impacts will be evaluated in the draft EIR.

XVIII.c) The proposed project may cause adverse effects on human beings. Air quality, biological resources, energy, geology and soils, hazards and hazardous materials, hydrology/water quality, noise, solid/hazardous waste, and transportation/traffic may be adversely affected as a result of the proposed project. These environmental issues will be evaluated in the draft EIR.

No impacts to aesthetics, agricultural resources, cultural resources, land use and planning, mineral resources, population and housing, public services, and recreation are expected as a result of the project. Therefore, these environmental issues will not be further evaluated in the draft EIR.