

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

**DRAFT INITIAL STUDY FOR THE LOS ANGELES DEPARTMENT OF
WATER AND POWER'S INSTALLATION OF A COMBINED CYCLE
GENERATING FACILITY AT THE VALLEY GENERATING STATION**

May 2001

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CHAPTER 1

INTRODUCTION

Project Overview

Agency Authority

Project Location

1.1 PROJECT OVERVIEW

The 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_x) and oxides of sulfur (SO_x) 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 facilities added flexibility in meeting their emission reduction requirements, to lower the cost of compliance, and achieve clean air for the Basin. RECLAIM prescribes only total annual facility emission goals. Facility operators are free to choose control strategies that work best for their facility. The emission goals are established in the form of annual allocations comprised of RECLAIM trading credits (RTCs). Facilities comply with RECLAIM by installing control equipment that limits their annual NO_x and/or SO_x emissions to below or at their annual allocations; or by purchasing additional RTCs to account for any exceedances above their annual allocations.

To help Los Angeles Department of Water and Power (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 peak electricity demand periods, thereby reducing the risk of blackouts for the state, LADWP is proposing modifications to its Valley Generating Station (VGS), which is located in the Basin. It is envisioned that the proposed project, consistent with the intent of RECLAIM, will achieve an overall decrease in NO_x emissions, resulting in both localized and regional air quality benefits.

To accomplish the aforementioned goals at the earliest possible time, LADWP has entered into a compliance agreement with the SCAQMD. The agreement requires that LADWP begin equipment installation and modifications at the VGS starting in 2001, such that affected power generating units will be in-use by Summer 2003. The modifications that will occur at the facility are summarized below. For a complete description of the proposed project and the anticipated activities at the VGS, please refer to Chapter 2 of this document.

The LADWP is proposing to install a new combined cycle generating facility (CCGF) at an existing generating station. The CCGF will replace four existing utility boilers, and will include two combustion gas turbines (CTs), a new steam turbine generator, two heat recovery steam generators (HRSGs) and associated selective catalytic reduction (SCR) systems, cooling towers and ancillary equipment.

1.2 AGENCY AUTHORITY

The California Environmental Quality Act (CEQA) applies to proposed “projects”

initiated by, funded by, or requiring discretionary approvals from State or local government agencies. The proposed installation of the CTs, HRSGs, steam turbine generator, cooling towers and SCRs constitutes a “project” as defined by CEQA (California 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 proposed project is being initiated to comply with air quality regulations (e.g., RECLAIM), LADWP and the SCAQMD have determined 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 adverse 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, the issue areas for which no significant adverse environmental impact is expected to occur have been identified and thereby eliminated from further evaluation. Issue 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 expected to be used to comply with the declining annual allocations required under 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 potentially significant adverse environmental impacts associated with the proposed project, no further analysis will be required (CEQA Guidelines §15152(d)).

The California Energy Commission (CEC) was also considered for the role of lead agency since the proposed project involves modifications at a power-generating facility. However, the proposed project is not subject to the provisions of the Warren-Alquist Act, since it will not exceed the maximum net generating increase allowed by the CEC.

The VGS currently consists of four power generating units (Units 1 through 4) with a net generating capacity of 520.6 megawatts (MW). The net generating capacity of the proposed project is 528.5 MW and the net generating capacity of the peaking plant under construction at VGS (part of a project previously evaluated in accordance with CEQA) is 42 MW. The total net generating capacity of 570.5 MW from the proposed project and the peaking plant under construction is less than the allowed maximum net capacity of 570.6 MW (520.6 + 50), which exempts the proposed

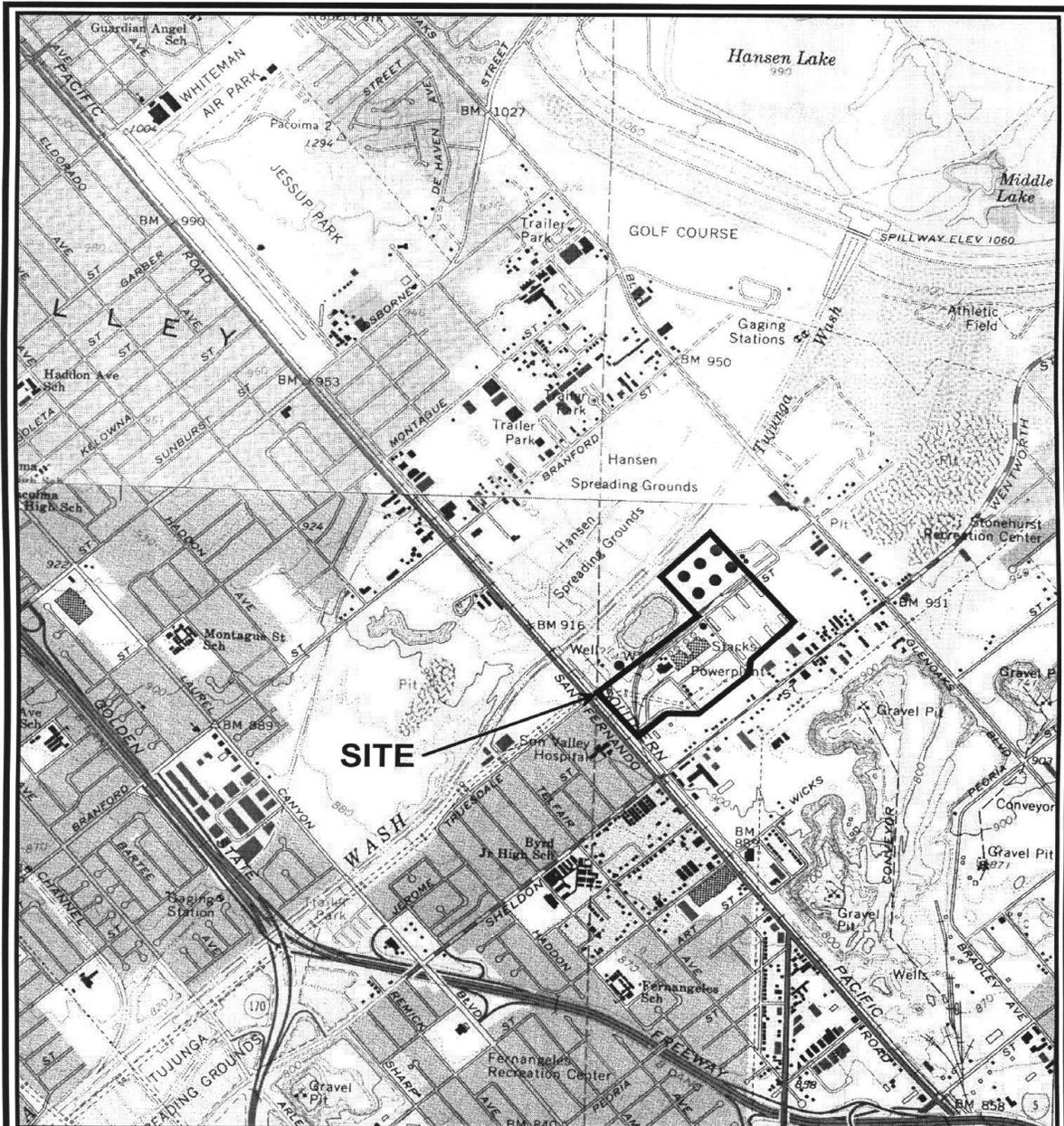
project from the requirements of the Warren-Alquist Act.

Units 1 and 2 are already decommissioned. Within 120 days of the date of establishing successful commercial operation of the new CCGF, LADWP will apply for non-operational status per SCAQMD Rule 2102 for Units 3 and 4. LADWP will disconnect fuel feed lines and place flanges at both ends of the disconnected lines or remove a major component of the units necessary for their operation.

1.3 PROJECT LOCATION

The LADWP Valley Generating Station is located at 11801 Sheldon Street in the City of Los Angeles (Sun Valley) (please refer to Figure 1-1). The facility is bounded by Glenoaks Boulevard to the northeast and San Fernando Road to the southwest. The Union Pacific Railroad parallels San Fernando Road to the southwest of the site. The Tujunga Wash, a flood control channel, is to the northwest (Please refer to Figure 1-2).

The land use surrounding the facility is primarily commercial and industrial. Other uses located nearby on San Fernando Road include an emergency medical clinic, a hospital and two motels. The closest residential property is located approximately ½ mile to the north of the VGS. A sand and gravel plant is located adjacent and to the northwest of the site.



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

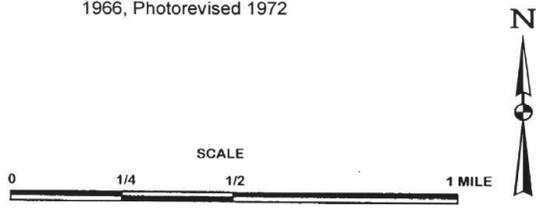
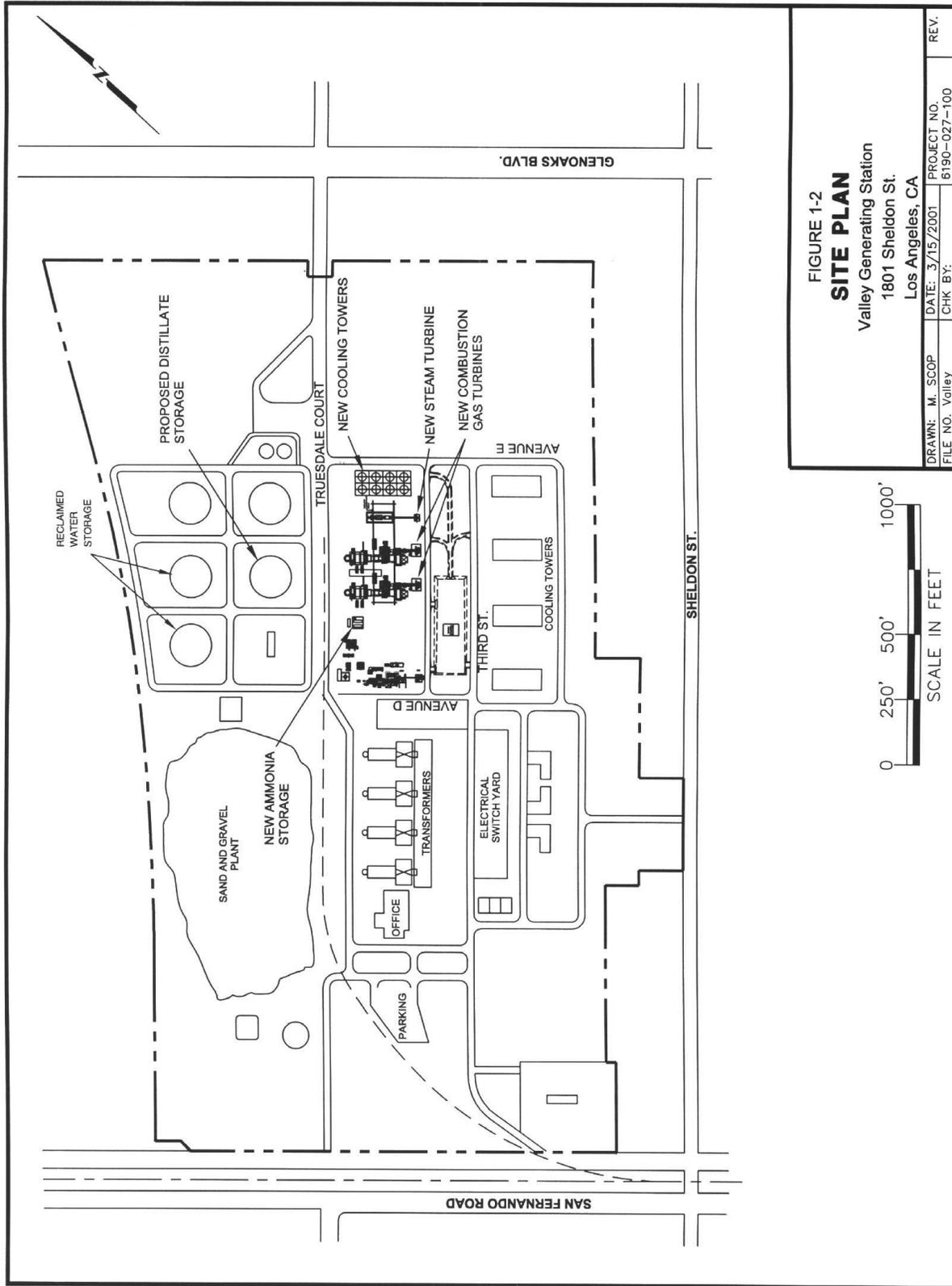


FIGURE 1-1
SITE LOCATION MAP

Valley Generating Station
 11801 Sheldon St.
 Los Angeles, CA

| | | |
|----------------------------|-----------------|--------------------------------|
| Drawn by: M. Scop | Date: 3/15/2001 | Project Number 6190-027-100 |
| Figure Name: 6190026D2.dsf | Checked by: | |



CHAPTER 2

PROJECT DESCRIPTION

Proposed Project

Permits and Approvals

Construction Schedule

Operation

Project Termination and Decommissioning

2.1 PROPOSED PROJECT

The VGS is a 150-acre electric power generating facility designed to supply power to the LADWP distribution grid. The facility currently consists of four utility boilers with associated generating capacities ranging from 100 MW to 172.8 MW. LADWP is proposing to install new combined cycle generating equipment at the VGS to replace the four existing boilers.

The proposed project includes the installation of two new CTs, a steam turbine generator, two HRSGs with associated SCRs, cooling towers and ancillary equipment to control various combustion emissions. The SCR process uses a catalyst to facilitate a reaction between NO_x and aqueous ammonia, to reduce NO_x emissions and produce nitrogen and water. The project will also include a change in service of one aboveground storage tank (AST) which will be used to store distillate fuel. Two new 20,000-gallon ASTs will be constructed to store aqueous ammonia for the SCR units.

Power Generating Equipment

The combined cycle equipment will include two General Electric PG7241 FA CTs in a two-on-one configuration with one General Electric steam generator. The excess heat from the two turbines will be supplied to the steam generator. The equipment will be designed to provide a based load capacity of approximately 500 MW with a peaking capacity of 528.5 MW. The combined cycle facility will be fired by natural gas with the capability to fire with distillate fuel under emergency conditions. The CTs will produce thermal energy through the combustion of natural gas and the conversion of thermal energy into mechanical energy required to drive the compressors and generators, which produce electricity. Air is supplied to the CTs through an inlet air filter and evaporative coolers by an air inlet duct. Fuel (natural gas) is supplied at approximately 450 pounds per square inch gauge (psig) pressure by gas compressors. This mixture of fuel and air is ignited and burned, producing high temperature pressurized gas to drive the turbine and electric generator.

Exhaust gases from two CTs will be directed to individual HRSGs, each with its own stack. Steam generated from the HRSGs will flow through high and low pressure piping to the steam turbine generator. Exhaust steam will be vented from the turbine to a circulating water-cooled condenser and then returned by pumps to the HRSGs. Each of the three electrical generators will feed each of the three corresponding generator step-up transformers which will be connected by pole lines to the existing switchyard and 230 kilovolt (kV) transmission lines. Excess heat from the new CCGF process will be managed by installing new cooling towers.

The CTs will include built-in pollution controls based on a dry combustion design to reduce NO_x emissions. SCR will be installed on the HRSGs to reduce NO_x and CO

emissions. In addition, each CT will include a weatherproof, acoustic (e.g., sound dampening) enclosure with separate compartments for the turbine and generator. Lighting as well as fire and gas detection equipment will be provided in each compartment.

Ammonia Handling and Storage

Aqueous ammonia (ammonium hydroxide at 29.5 percent concentration by weight) will be used to reduce NO_x emissions. Aqueous ammonia has been selected primarily for its ease of use and its ability to be safely transported and handled onsite at the VGS. The ammonia will be delivered by truck and stored in two new 20,000-gallon ASTs.

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.

2.2 PERMITS AND APPROVALS

The proposed project will require permits and approvals prior to construction and then once the VGS modifications go online. The majority of permits and approvals will be SCAQMD permits to construct and permits to operate (e.g., permits for the new CTs and steam turbine generator). Permits may also be required from the City of Los Angeles. The City of Los Angeles is a CEQA responsible agency for this project¹.

2.3 CONSTRUCTION

Construction of the proposed project is scheduled to begin in the fall of 2001 and continue to the summer of 2003. Construction activities are anticipated to take place six days per week, Monday through Saturday, from 6:00 a.m. to 5:00 p.m. Night and/or Sunday shifts may be required to ensure that construction activities stay on schedule.

Construction activities will require a laydown area within the existing facility to store equipment and materials. In addition, contractors may require that temporary trailers be located onsite for construction planning and management activities.

2.4 OPERATION

Once complete, the proposed project will not require additional personnel to support

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

operations at the VGS. During peak demands, the facility will operate 24 hours per day, seven days per week.

2.5 PROJECT TERMINATION AND DECOMMISSIONING

The estimated life of the modifications to the VGS is expected to be over 30 years. Equipment which is no longer effective may then be shut down and/or decommissioned, replaced, or modified in accordance with applicable regulations and market conditions prevailing at the time of termination. Decommissioning would likely involve a combination of salvage or disposal in accordance with applicable federal, state, and local regulations, as well as site restoration consistent with the surrounding land use and zoning laws.

2.6 PROJECT ALTERNATIVES

Based on the evaluation of the proposed project and the findings of potential significant adverse impacts identified in this initial study, an environmental impact report (EIR) will be prepared.

The EIR will describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. The EIR need not consider every conceivable alternative to the project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. The EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives (California Code of Regulations [CCR], Title 14, §15126.6(a)).

Alternatives will be developed based in part on the major components of the proposed project. The rationale for selecting alternatives rests on the CEQA requirement to present “realistic,” and feasible alternatives; that is, alternatives that can actually be implemented. The discussion will identify the practical result of the project’s non-approval, and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment.

CEQA also requires an evaluation of a “no project alternative.” The purpose of describing and analyzing a no project alternative is to allow decisionmakers to compare the impacts of approving the proposed project, with the impacts of not approving the proposed project. The no project alternative analysis is not the baseline for determining whether the proposed project’s environmental impacts may be significant, unless it is identical to the existing environmental setting analysis

which does establish that baseline (CCR, Title 14, §15126.6(e)(1)).

The “no project” analysis will discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced. The analysis will also include what would be reasonable expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the “no project” alternative, the EIR will also identify an environmentally superior alternative among the other alternatives (CCR, Title 14, §15126.6(e)(2)).

Project alternatives may also be based on suggested alternatives received during the public comment period for the initial study.

CHAPTER 3

ENVIRONMENTAL CHECKLIST

3.1 INTRODUCTION

The initial study environmental checklist provides a standard evaluation tool to identify a project's adverse environmental impacts. The environmental factors found to be potentially affected by the proposed project will be further analyzed in an appropriate CEQA document. This checklist also identifies the factors which will not be adversely affected by the proposed project, thereby eliminating the need for further analysis of these issues in any subsequent CEQA document.

3.2 GENERAL INFORMATION

| | |
|---|---|
| Lead Agency Name: | South Coast Air Quality Management District |
| Lead Agency Address: | 21865 E. Copley Drive Diamond Bar, CA 91765 |
| Contact Person: | Kathy C. Stevens |
| Contact Phone Number: | (909) 396-3439 |
| Project Sponsor's Name: | Los Angeles Department of Water and Power |
| Project Sponsor's Address: | 111 North Hope Street Los Angeles, CA 90012-2694 |
| General Plan Designation: | Public Facilities |
| Zoning: | [Q]PF-1XL and [Q]PF-1XL-G (Public Facilities) |
| Description of Project: | The LADWP is proposing to install a new CCGF to replace four existing utility boilers at the VGS. The new CCGF will include two CTs, a new steam turbine generator, two HRSGs and associated SCR systems, cooling towers and ancillary equipment. |
| Surrounding Land Uses and Setting: | VGS is located in the City of Los Angeles (Sun Valley). The land uses in the area are primarily commercial and industrial. |
| Other Public Agencies Whose Approval is Required: | The City of Los Angeles. |

3.3 POTENTIALLY SIGNIFICANT IMPACT AREAS

The following environmental factors were determined to be potentially affected by the proposed project. As indicated by the checklist and associated discussions on the following pages, the environmental topics marked with an "✓" may be adversely affected by the proposed project. These topics will be evaluated in further detail in the appropriate CEQA documents.

-
- | | | |
|---|--|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture Resources | <input checked="" type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input checked="" type="checkbox"/> Geology Soils | <input type="checkbox"/> Hazards & Hazardous Materials | <input 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 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.

| | Potentially Significant Impact | Less Than Significant Impact | No Impact |
|--|---|---|-------------------------------------|
| I. AESTHETICS. 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 VGS is located in an area of existing mixed uses. Industrial, residential and commercial uses are located within ½ mile of the facility. The predominant adjacent land uses include a sand and gravel plant, light industry, an emergency medical clinic, a hospital, and two motels. The CTs and steam turbine generator will be installed at the location of former cooling towers. The installation of the CTs will require additional exhaust stacks, which are expected to be approximately 140 feet high.

These modifications are expected to blend with the existing facilities with no significant adverse impacts on existing scenic vistas.

I.b) Scenic resources do not exist in the immediate or surrounding areas near the VGS. Further, the VGS is not located within a state scenic highway.

I.c) Proposed facility construction and equipment modifications will be conducted within the confines of the existing generating station. The VGS is located in an area of mixed uses, including commercial, industrial and residential. The proposed new structures and equipment are similar to existing facility components and are not expected to result in significant adverse impacts to the existing visual character or quality of the proposed project site or the immediate vicinity.

I.d) Additional permanent light sources will be installed at the VGS; however due to the industrial nature of the areas, the new lighting is not expected to result in significant impacts to day or nighttime views. In addition, the new lighting will not adversely affect residences, which are approximately ½ mile away. The proposed equipment modifications are not expected to require materials that would add a new glare source to the facility.

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 would be short-term. Therefore, no significant adverse impacts associated with light and glare during construction are anticipated as part of this project.

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

| | Potentially Significant Impact | Less Than Significant Impact | No Impact |
|--|---|---|-------------------------------------|
| II. AGRICULTURE RESOURCES. 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"/> |

| | Potentially Significant Impact | Less Than Significant Impact | No Impact |
|--|---|---|------------------|
|--|---|---|------------------|

II. AGRICULTURE RESOURCES. Would the project:

- | | | | |
|---|--------------------------|--------------------------|-------------------------------------|
| 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 an existing industrial facility. No agricultural resources are present on or in close proximity to the site. Therefore, the project would not convert farmland (as defined in #a above) to non-agricultural use or involve other changes in the existing environment that would convert farmland to non-agricultural use.

Additionally, the facility is not zoned for agricultural use, nor are adjacent land uses zoned for agricultural use. Therefore, the project would not conflict with existing agricultural zone or Williamson Act contracts. Based on these considerations, significant adverse Agricultural Resources impacts at the VGS are not anticipated and will not be further analyzed in the draft EIR.

| | Potentially Significant Impact | Less Than Significant Impact | No Impact |
|--|---|---|------------------|
|--|---|---|------------------|

III. AIR QUALITY. Would the project:

- | | | | |
|--|-------------------------------------|--------------------------|-------------------------------------|
| a) Conflict with or obstruct implementation of the applicable air quality plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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"/> |

| | Potentially Significant Impact | Less Than Significant Impact | No Impact |
|--|---|---|------------------|
|--|---|---|------------------|

III. AIR QUALITY. Would the project:

- | | | | |
|--|-------------------------------------|--------------------------|-------------------------------------|
| 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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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) The proposed project is being undertaken as a result of an Order of Abatement between LADWP and the SCAQMD. This order establishes a specific schedule for reducing emissions from the VGS to bring the facility into compliance with its annual NO_x RECLAIM allocation. The RECLAIM program is a State Implementation Plan (SIP)-approved regulation. As a result, the proposed project is being implemented to meet the Reasonable Further Progress (RFP) requirements of RECLAIM to reduce NO_x emissions at the facility, and to be in compliance with the policies and emission reduction targets contained in the SCAQMD's AQMP. Therefore, this issue will not be further analyzed in the draft EIR.

III.b and c) The proposed project involves the installation of two CTs and associated SCR systems, a steam turbine generator, and ancillary equipment. The installation of this equipment at VGS will involve site preparation, construction and equipment installation. The emissions generated during construction-related activities (e.g., operation of on-site heavy-duty construction equipment, on-site worker activities, worker commute trips, and construction material transport trips) will be analyzed in the draft EIR to determine whether construction emissions could contribute to potential significant adverse air quality impacts.

Although the proposed project is being undertaken in part to comply with air quality regulations, operational emissions will be analyzed to determine if the proposed project could create significant adverse air quality impacts. For example, although the new CTs will be equipped with both pre- and post-combustion air pollution controls (e.g., SCR, carbon monoxide (CO) catalyst) to comply with the SCAQMD's New Source Review (NSR) Best Available Control Technology (BACT) requirements, the CTs will still release combustion emissions such as NO_x, CO, SO_x, fine particulate matter (PM₁₀), and volatile organic compounds (VOCs). These combustion emissions generated from operation of the CTs will be analyzed in the draft EIR to determine whether the emissions will create potential significant adverse air quality impacts.

The SCR units require the use of aqueous ammonia as a reductant to reduce NO_x emissions. Some of the ammonia passes through the SCR system unreacted (known as "ammonia slip") to form PM₁₀ in the atmosphere. Ammonia slip associated with the operation of SCRs on the CTs will be analyzed in the draft EIR to determine whether it could result in potential significant adverse air quality impacts. The mobile source emissions associated with tanker trucks delivering ammonia will be evaluated in the draft EIR as well.

III.d) Emissions from the proposed project may potentially expose local residents, worker populations, and sensitive receptors to toxic air contaminants. A health risk assessment (HRA) based on these estimated emissions will be conducted to determine the human health impacts of the proposed project in the vicinity of VGS. The results of the health risk assessment will be included in the draft EIR and the HRA will be included in the EIR as an appendix.

III.e) Byproducts from the combustion of natural gas are not known to produce objectionable odors. Ammonia slip is anticipated at approximately 5 parts per million (ppm) in the flue gas from the CTs. The odor threshold (the concentration in air at which the odor can be detected by a person) for ammonia is 25 ppm, and therefore, an objectionable odor is not anticipated from ammonia. As a result, potential significant adverse odor impacts will not be further analyzed in the draft EIR.

III.f) The proposed project will be required to comply with all relevant federal, state and local regulations. Specific permits will be required prior to construction. Prior to operation, the SCAQMD will require an approved “permit to operate” for the facility demonstrating compliance with applicable rules and regulations. The generating station, both current operations and proposed modifications, must also comply with SCAQMD regulations governing specific equipment or components of the facility. Air quality compliance will be discussed in the draft EIR. The compliance discussion will include, but is not limited to, source-specific rules for existing equipment (SCAQMD Regulation XI), relevant prohibitory rules (SCAQMD Regulation IV), rules governing the installation of new, modified or relocated equipment (Regulation XIII-New Source Review), Regulation XX-RECLAIM (specifically Rule 2005), Prevention of Significant Deterioration (Regulation XVII), and Rule 1401-New Source Review of Toxic Air Contaminants).

| | Potentially Significant Impact | Less Than Significant Impact | No Impact |
|---|--------------------------------|------------------------------|-------------------------------------|
| IV. BIOLOGICAL RESOURCES. 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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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"/> |

| | Potentially Significant Impact | Less Than Significant Impact | No Impact |
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IV. BIOLOGICAL RESOURCES. Would the project:

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|--|--------------------------|--------------------------|-------------------------------------|
| 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 entirely within the boundaries of an existing power generating station which has already been greatly disturbed. The VGS and area in the immediate vicinity 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 identified by the California Department of Fish and Game or the U.S Fish and Wildlife Service are found in proximity to the VGS. Therefore, no significant adverse impacts to biological resources are expected and the issue will not be further evaluated in the draft EIR.

IV.e and f) The proposed project will not conflict with local policies or ordinances protecting biological resources; will not conflict with local, regional, or state conservation plans; and 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.

| | Potentially Significant Impact | Less Than Significant Impact | No Impact |
|---|---|---|-------------------------------------|
| V. CULTURAL RESOURCES. 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) 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) The proposed project will be confined within the footprint of existing power generating station. In addition, an archaeological survey was conducted at the VGS as part of the LADWP Electrical Generation Stations Modifications Project (Environmental Impact Report, SCAQMD, 2001. SCH No. 2000101008). According to Conejo Archaeological Consultants' archaeological survey report *Phase I Archaeological Investigation of Limited Areas within the Los Angeles Department of Water and Power's Harbor, Scattergood, and Valley Generating Stations, Los Angeles, California*, dated October 26, 2000, no historically significant properties were identified within the confines of the VGS site. Therefore, no impacts to historical resources as defined in CCR Title 14, § 15064.5 will occur as a result of the proposed project.

V. b, c and d) Construction activities for the turbines, SCRs, and other associated equipment will occur in previously disturbed areas. In addition, according to information provided in the October 2000 Conejo Archaeological Consultants' report referenced above, no archaeological prehistoric or historic resources or cultural resources were identified within the project area. Therefore, potential adverse impacts to archaeological, paleontological and human remains are not expected.

Based upon the results of the Conejo Archaeological Consultants' report, significant cultural resources impacts are not expected, and will not be further analyzed in the draft EIR.

| | Potentially Significant Impact | Less Than Significant Impact | No Impact |
|---|---|---|-------------------------------------|
| VI. ENERGY. 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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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. The proposed project is therefore not expected to conflict with energy conservation plans.

VI. b, c and d) The intent of the proposed project is two-fold: (1) to comply with an Order of Abatement between the LADWP and the SCAQMD to bring the VGS into compliance with its NO_x RECLAIM annual allocation; and (2) to respond to the current need, as well as future demands, for additional electric power.

The proposed project replaces inefficient boilers with efficient gas turbines. This modification is intended to create a net reduction in natural gas demand for the VGS. An estimated net reduction in natural gas demand is expected. The proposed project is also expected to produce additional energy to meet the increased peak and base period demands. The expected net increase in generating capacity as a result of the installation of the new CTs is approximately 6.0 megawatts (1.15 percent increase of the total VGS capacity).

The VGS requires natural gas to operate the facility. California is the second largest consumer of natural gas in the nation, ranking behind Texas (CEC 1998a). In 1997, California consumed more than 20,000 million therms (approximately 5.5 billion cubic feet per day), with approximately 35 percent of that amount used to generate electricity. Peak demand, expressed in MW, measures the highest instantaneous consumption of electricity integrated over an hour of time during a calendar year. Coincident peak 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, August 1998). Statewide natural gas consumption is expected to increase by one percent per year from 12,978 million therms in 1997 to 14,235 million therms in 2007; however, the CEC states that natural gas resources are expected to be adequate for the next several decades (CEC report on California Natural Gas Analysis and Issues, November 2000).

The proposed project will not result in the need for new or substantially altered power or natural gas utility systems, will not create significant adverse impacts on local or regional energy supplies, or create significant adverse impacts on peak or base period demands for electricity or other forms of electricity. The proposed project will increase electric energy to support both current and future demands. As a result, energy resources will not be further evaluated in the draft EIR

| | Potentially Significant Impact | Less Than Significant Impact | No Impact |
|---|-------------------------------------|------------------------------|-------------------------------------|
| VII. GEOLOGY AND SOILS. 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"/> |
| c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

| | Potentially Significant Impact | Less Than Significant Impact | No Impact |
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VII. GEOLOGY AND SOILS. Would the project:

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|--|--------------------------|--------------------------|-------------------------------------|
| 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 wastewater disposal systems where sewers are not available for the disposal of wastewater? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

VII.a.) Southern California is an area known for seismic activity. There are numerous active faults in the area, the closest of which is the Verdugo Fault. The project is located outside of areas identified as active fault traces within the Alquist Priolo Earthquake Fault Zones. Subsurface geologic materials consist predominantly of sand, silty sand, gravel and cobbles. Groundwater in nearby wells is reported to be 180 to 200 feet below ground surface. Due to the depth of groundwater, the potential for ground failure due to liquefaction of subsurface sediments during an earthquake is unlikely. The slopes immediately adjacent to the 80-foot deep gravel pit have been identified as areas potentially susceptible to slope failure during an earthquake by the California Division of Mines and Geology; however the project elements are located outside of the areas identified as potentially affected. The construction and installation activities will conform to the latest versions of the California Building Code, the Uniform Building Code, the City of Los Angeles Building Code and other applicable federal, state and local codes. Where appropriate, engineering drawings will be reviewed and approved by registered professional civil or structural engineer(s) and/or registered engineering geologists. The potential for impacts from seismic shaking or ground failure will be addressed in the draft EIR. If potential significant impacts are found, appropriate feasible mitigation measures will be identified and implemented.

VII.b) Construction activities include minimal grading. The proposed project will occur within an area that has been previously graded. As a result, 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 VGS are not particularly susceptible to collapse, lateral spreading or liquefaction. The project elements are located outside of the area identified as susceptible to seismically induced landslides. No known unique geologic features are located on the site and subsidence is not expected to occur. Therefore, these issues will not be further evaluated in the draft EIR.

VII.d) The project is not expected to be impacted by expansive soils. Therefore, this impact issue will not be further analyzed in the draft EIR.

VII e) The site is served by a public sewer system. Therefore, the use of septic tanks or alternative wastewater disposal systems will not be further assessed in the draft EIR.

| | Potentially Significant Impact | Less Than Significant Impact | No Impact |
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VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

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|---|-------------------------------------|--------------------------|-------------------------------------|
| 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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

| | Potentially Significant Impact | Less Than Significant Impact | No Impact |
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VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

- | | | | |
|--|--------------------------|-------------------------------------|-------------------------------------|
| 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 type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 checked="" type="checkbox"/> | <input 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) The proposed project includes the addition of two new CTs with SCR systems utilizing aqueous ammonia (29.5 percent by volume) injection for NO_x control. These new SCR systems will require additional ammonia, which will be piped to the SCRs from two new 20,000-gallon ASTs. A 20,000-gallon AST is being constructed to store aqueous ammonia for a peaking turbine currently under construction. This turbine will be in service prior to the start of the proposed project.

The required additional aqueous ammonia for VGS will be replenished on a weekly basis by one tanker truck with a capacity of 5,000 gallons. As a result, the transportation and use of the additional aqueous ammonia will create an incremental increased risk of an accidental release. The magnitude and frequency of a catastrophic release during a tanker truck accident or collision due to the transportation of aqueous ammonia analyzed in the draft EIR.

VIII.b) The storage of aqueous ammonia onsite may increase the potential for accidental releases. Structural failure, accidental damage, external events such as earthquakes, or operational mishaps during filling can cause spills. The frequency and magnitude of various ammonia release scenarios associated with new aqueous ammonia storage tanks will be evaluated in the draft EIR.

VIII.c) The facility is not located within one-quarter mile of an existing or proposed school. As a result, this issue will not be further evaluated in the draft EIR.

VIII.d) Government Code §65962.5 refers to a list of facilities which may be subject to the Resource Conservation and Recovery Act (RCRA) corrective action program. VGS is listed on the database only because the facility is a large-quantity generator of hazardous waste. The VGS is not on a list of known contaminated sites. Hazardous wastes from the facility are managed in accordance with applicable federal, state, and local rules and regulations. The hazardous waste generated from proposed project activities 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 adverse hazards impacts from the disposal of hazardous materials are not expected, and will not be further analyzed in the draft EIR.

VIII.e and f) The VGS is not located within two miles of a public or private airport; therefore, this impact issue will not be further evaluated in the draft EIR.

VIII.g) The proposed project is not expected to adversely affect local emergency response or evacuation 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. Therefore, no adverse occupational health impacts are expected as a result of construction and operation of this project.

VIII.h and i) The proposed project site is located in an urban area. No wildlands are located in the immediate or surrounding area. As a result, there is no risk of loss, injury or death involving wildland fires, and thus no potential significant adverse impact. This topic area will not be further evaluated in the draft EIR.

The new power generating equipment will be fueled by natural gas. Natural gas for the CTs will be supplied from existing pipelines and no additional pipeline capacity is required. Fire suppression measures that currently exist will be expanded to accommodate the new turbines. These impacts are considered less than significant and will not be evaluated in the draft EIR.

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| Potentially Significant Impact | Less Than Significant Impact | No Impact |
|---|---|------------------|

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 |
|--|---|---|-------------------------------------|
| IX. HYDROLOGY AND WATER QUALITY. | | | |
| 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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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"/> |

| | Potentially Significant Impact | Less Than Significant Impact | No Impact |
|--|-------------------------------------|------------------------------|-------------------------------------|
| IX. HYDROLOGY AND WATER QUALITY. | | | |
| Would the project: | | | |
| 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"/> |
| 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"/> |

| | Potentially Significant Impact | Less Than Significant Impact | No Impact |
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IX. HYDROLOGY AND WATER QUALITY.

Would the project:

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|--|-------------------------------------|--------------------------|--------------------------|
| 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"/> |
| 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) The existing VGS operates within strict water quality standards and in accordance with applicable federal, state and local rules and regulations. The proposed project, a modification to this facility, will also comply and operate within the parameters of federal, state, and local rules and regulations.

As a result, the proposed project will not pose a potential significant adverse impact to water quality standards or waste discharge requirements. This topic area will not be further evaluated in the draft EIR.

IX.b) The proposed project will not require the use of groundwater or require the construction of groundwater wells, or substantially interfere with groundwater recharge capabilities. No potential groundwater supply impacts are anticipated as a result of the proposed project. Potential impacts to groundwater will not be further evaluated in the draft EIR.

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| Potentially Significant Impact | Less Than Significant Impact | No Impact |
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IX. HYDROLOGY AND WATER QUALITY.

Would the project:

IX.c, d, and e) As the proposed project would be undertaken at an existing power generating station 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.f) Because the proposed project will include the additional storage of aqueous ammonia in ASTs, waters of the U.S. could be impacted if a leak or rupture occurs. Accordingly, potential adverse water quality impacts associated with this scenario will be examined in the draft EIR.

IX.g, h, i, and j) Based upon site topography and/or site elevation 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 will result in additional wastewater discharge from cooling operations, cleaning operations and NO_x control to the publicly owned treatment works (POTW). Wastewater will not be discharged to waters of the State. The additional discharge volumes are not expected to exceed the capacity of the existing wastewater facilities. In addition, these discharges will be monitored for water quality to ensure compliance with the permit of the POTW. As a result, the proposed project is not anticipated to adversely impact existing wastewater facilities. Therefore, this impact issue will not be further evaluated in the draft EIR.

IX.l and m) The proposed facility modifications are not expected to require the construction of new stormwater drainage facilities or expansion of existing facilities, or require the construction of new water or wastewater treatment facilities or expansion of existing facilities. As a result, a further discussion of the need for additional or expanded stormwater, water or wastewater facilities will not be included in the draft EIR.

IX.n) The proposed project is a modification to an existing facility and is not expected to require a significant demand for an increase in water supplies. Sufficient water supplies are available to the facility from existing entitlements. As a result, a further evaluation of water supply will not be included in the draft EIR.

| | Potentially Significant Impact | Less Than Significant Impact | No Impact |
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X. LAND USE AND PLANNING. Would the project:

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| a) Physically divide an established community? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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| | Potentially Significant Impact | Less Than Significant Impact | No Impact |
|--|---|---|-------------------------------------|
| X. LAND USE AND PLANNING. Would the project: | | | |
| 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) The proposed project is located within an existing industrial facility. No communities or private residences are located within 1/2 mile of the facility. As a result, the proposed project will not divide an established community, nor will it conflict with local habitat conservation plans or natural community conversation plans.

X.b) The proposed project will comply with applicable land use plans, policies or regulations of an agency with jurisdiction over the project.

Based on the above considerations, no significant project-related adverse impacts to Land Use and Planning are expected to occur. Therefore, land use issues will not be further analyzed in the draft EIR.

| | Potentially Significant Impact | Less Than Significant Impact | No Impact |
|---|---|---|-------------------------------------|
| XI. MINERAL RESOURCES. 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 proposed project modifications would be constructed on land within existing industrial uses. There are no known mineral resources on the VGS, and the proposed project will not result in the loss of important mineral resources. Therefore, no significant adverse Mineral Resource impacts are expected and no further evaluation of mineral resources will be included in the draft EIR.

| | Potentially Significant Impact | Less Than Significant Impact | No Impact |
|---|---|---|-------------------------------------|
| XII. NOISE. 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"/> |
| 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"/> |

| | Potentially Significant Impact | Less Than Significant Impact | No Impact |
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XII. NOISE. Would the project result in:

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|---|-------------------------------------|--------------------------|-------------------------------------|
| 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 site is located in an existing industrial setting. However, a hospital is located adjacent to the VGS. Therefore, 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 site 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. 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, SCRs, and associated equipment. Therefore, potential operational noise impacts will be evaluated in the draft EIR.

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

XII.e) VGS is not near an existing airport. Therefore, incremental generated noise from the proposed project would be unlikely to significantly interact with airport noise. Accordingly, this impact issue will not be further evaluated in the draft EIR.

XII.f) The VGS is not located within the vicinity of a private airstrip and project activities 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.

| | Potentially Significant Impact | Less Than Significant Impact | No Impact |
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XIII. POPULATION AND HOUSING. Would the project:

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|---|--------------------------|--------------------------|-------------------------------------|
| 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"/> |
| 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 will occur within an existing industrial power generating facility located in a highly urbanized area. The proposed project will not require the recruitment of additional personnel, nor induce substantial population growth in the area. In addition, the proposed project, which is a modification to an existing facility, will not require either directly or indirectly additional infrastructure development (e.g., roads, water/wastewater systems). Based upon this information the proposed project will not result in changes in population densities or induce significant growth in population.

XIII.b and c) The proposed project involves improvements and modifications at an existing industrial facility. No existing houses or people will be displaced as a result of this project. No construction of replacement housing will be necessary in order to implement the proposed 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.

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| Potentially Significant Impact | Less Than Significant Impact | No Impact |
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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 type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Police protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" 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 proposed project site is located within an existing industrial facility. Local police, fire and ambulance entities will respond in the case of an emergency. The proposed project is a modification to an existing facility and is not expected to generate the need for additional fire, police or emergency services.

XIV.c, d, and e) The proposed project is located within a highly urbanized industrial area. No schools, parks or other public facilities will be significantly impacted by the proposed project. No schools, parks or other public facilities are located within the vicinity of the proposed project. The proposed project will not induce population growth, require the construction of additional housing, or result in a permanent increase in personnel at the VGS. Temporary changes at the facility will include the addition of a local labor workforce during construction activities. The local labor pool (e.g., workforce) is adequate to fill the short-term construction needs for personnel.. Since a local labor pool will provide the temporary workforce, they will not be relocated to the project vicinity and will not impact schools, parks or other public facilities. As a result, these public services are not expected to be adversely impacted by the proposed project, and will not be further evaluated in the draft EIR.

| | Potentially Significant Impact | Less Than Significant Impact | No Impact |
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XV. RECREATION.

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| 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 and b)The proposed project is a modification to an existing facility in a predominately industrial area. No recreational facilities are located within the immediate vicinity of the project site. The proposed project will not result in changes in population densities around the facility or cause the relocation of people to the area. Therefore, the proposed project will not increase the use of existing neighborhood and/or regional parks or other recreational facilities or require the construction or expansion of recreational facilities near the project site. Therefore, significant adverse impacts to recreation are not expected from the proposed project, and this issue area will not be further evaluated in the draft EIR.

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

XVI.a) The proposed project is a modification to an existing industrial facility that currently generates solid waste which typically is disposed to an appropriate disposal facility, or recycled. The estimated capacity of the landfills within the Basin is expected to be adequate. Solid waste generation and disposal will increase during the construction phase of the proposed project. These wastes will most likely consist of concrete, asphalt, wood, and metal debris. The construction debris will be disposed in an appropriate landfill or recycled. 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.

Small amounts of hazardous wastes will be generated by proposed project operations. Over time, the catalyst material used in the SCR process loses its effectiveness and must be replaced. The spent catalyst will be preferentially recycled, otherwise it will be disposed at a Class I (hazardous waste) landfill or recycled. There are currently three Class I landfills located in California and hazardous wastes can also be transported to permitted facilities outside California. Based on the fact that spent catalyst is generated periodically, the catalyst will be preferentially recycled, and adequate landfill capacity is available for the disposal of the material, no significant impacts are expected and this issue will not be evaluated in the draft EIR.

XVI.b) The proposed project will occur at an existing industrial facility. Solid wastes, both non-hazardous and hazardous, are accumulated, handled and disposed in accordance with federal, state and local regulations. Since the proposed project is a modification to this existing facility, additional solid wastes (both non-hazardous and hazardous), will also be accumulated, handled and disposed in accordance with federal, state and local regulations. As a result, compliance issues associated with solid/hazardous wastes will not be further evaluated in the draft EIR.

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| Potentially Significant Impact | Less Than Significant Impact | No Impact |
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XVII. TRANSPORTATION/TRAFFIC. Would the project:

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| 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"/> |
|---|-------------------------------------|--------------------------|--------------------------|

| | Potentially Significant Impact | Less Than Significant Impact | No Impact |
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| XVII. TRANSPORTATION/TRAFFIC. Would the project: | | | |
| 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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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, b, e and f) A detailed traffic analysis will be prepared for the proposed project. The analysis will include an evaluation of existing traffic patterns and circulation; street system capacity and level of service; project-related vehicle trips; truck traffic; volume to capacity ratios; emergency access; consistency with local traffic/transportation plan, policies and programs; construction-related traffic control plans; and parking capacity (both during construction and during operation). The draft EIR will include an evaluation of potential traffic/transportation impacts, and include the actual detailed report as an appendix to the document.

XVII.c) The proposed project involves the installation of equipment at an existing power generating facility. This equipment (e.g., CTs, SCRs, and ancillary equipment) will be similar in height and appearance to the existing structures at the project site. Therefore, the proposed project is not expected to impact 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 an existing power generating facility and no offsite modifications are anticipated. Therefore, impacts associated with hazards associated with design features or incompatible uses will not be assessed in the draft EIR.

XVII.g) The project will take place at an existing facility in an industrial area and will not result in conflicts with policies, plans or programs supporting alternative transportation. Therefore, this impact issue will not be further evaluated in the draft EIR.

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| Potentially Significant Impact | Less Than Significant Impact | No Impact |
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XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.

| | Potentially Significant Impact | Less Than Significant Impact | No Impact |
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XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.

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|--|-------------------------------------|--------------------------|-------------------------------------|
| 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 type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects) | <input 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"/> |

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| Potentially Significant Impact | Less Than Significant Impact | No Impact |
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XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.

XVIII.a) As presented within this initial study, the proposed project involves equipment modifications to an existing power generated facility which is located in an industrial area. The project vicinity does not support riparian habitat, federally protected wetlands, migratory corridors, or cultural resources. No potential impacts to cultural/historical or biological resources are expected.

XVIII.b) The proposed project may contribute to cumulative impacts, depending on other projects that are currently ongoing or which may occur at the same time as the proposed project. The draft EIR will include a discussion of potential project-related cumulative impacts.

XVIII.c) The initial study process has identified specific environmental topic areas which may potentially be adversely affected by the proposed project. These areas will be evaluated in the draft EIR and include: Air Quality, Geology and Soils, Hazards and Hazardous Materials, Hydrology/Water Quality, Noise, and Transportation/Traffic.

Based on the findings of this initial study, specific environmental topic areas do not have the potential to be adversely affected by the proposed project. These areas will not be further evaluated in the draft EIR and include: Aesthetics, Agricultural Resources, Biological Resources, Cultural Resources, Energy, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation, and Solid/Hazardous Waste.