

DRAFT ENVIRONMENTAL IMPACT REPORT GRAYSON REPOWERING PROJECT

ENVIRONMENTAL IMPACT ANALYSIS
September 15, 2017

4.11 CUMULATIVE IMPACT ANALYSIS

The section below, sets forth the list of projects that is the basis for the cumulative impact analysis that appears in Sections 4.2 through 4.9 above. Sections 4.2 through 4.9 then set forth the analysis of potentially significant environmental impacts, both Project-specific and Section 4.11 for cumulative, for each resource area evaluated in this EIR. Readers should note that a number of potential impacts were determined to be less than significant in the first instance, or were determined not to be potential impacts of the project at all, and those determinations are set forth in Section 6.3 (effects Found Not to be significant).

4.11.1 Overview

The technical analysis contained in Sections 4.1 through 4.9 examines both Project-specific impacts and the potential environmental effects associated with related cumulative development. CEQA requires that EIRs discuss cumulative impacts, in addition to Project-specific impacts. In accordance with CEQA, the discussion of cumulative impacts must reflect the severity of the impacts and the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the Project alone. According to Section 15355 of the CEQA Guidelines:

“Cumulative impacts” refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. (a) The individual effects may be changes resulting from a single project or a number of separate projects. (b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

More specifically, Section 15130(a) of the CEQA Guidelines requires that EIRs discuss the cumulative impacts of a project when the project’s incremental effect is “cumulatively considerable.” Where a Lead Agency is examining a project with an incremental effect that is not cumulatively considerable, it need not consider the effect significant but must briefly describe the basis for its conclusion. Section 15130(a)(l) of the CEQA Guidelines further states, “a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts.”

If the combined cumulative impact associated with the project’s incremental effect and the effects of other projects is not significant, Section 15130(a)(2) of the CEQA Guidelines requires a brief discussion in the EIR of why the cumulative impact is not significant and why it is not discussed in further detail. Section 15130(a)(3) of the CEQA Guidelines requires supporting analysis in the EIR if a determination is made that a project’s contribution to a significant

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cumulative impact is rendered less than cumulatively considerable and, therefore, is not significant.

The fact that a cumulative impact is significant does not necessarily mean that the contribution of an individual project to the cumulative impact is significant as well. Instead, under CEQA, a project's contribution to a significant cumulative impact is only significant if the contribution is "cumulatively considerable." CEQA Guidelines 15130(a).

Section 15130(b) of the CEQA Guidelines recognizes that the analysis of cumulative impacts need not be as detailed as the analysis of project-related impacts, but instead should "be guided by the standards of practicality and reasonableness." Pursuant to this section, the following two elements should be considered as necessary to provide an adequate discussion of cumulative impacts: "(a) a list of past, present, and reasonably anticipated future projects producing related or cumulative impacts, including those projects outside the control of the Agency, or (b) a summary of projections contained in an adopted general plan or related planning document that is designed to evaluate regional or areawide conditions."

The discussion of cumulative impacts in this Draft EIR focuses on past, present, and reasonably anticipated future projects producing related or cumulative impacts, including those projects outside the control of the City of Glendale.

4.11.2 Projects Considered

The incremental effects of the Grayson Repowering Project, in connection with effects from past, current, and probable future projects that may result in similar impacts were assessed to determine potential cumulative impacts. The types of projects considered include other power generating projects in the area and projects at the Scholl Canyon Landfill where landfill gas currently being combusted at the Grayson Power Plant is collected. Projects of a similar nature within Glendale and neighboring areas identified through correspondence with water and power department representatives in the nearby Cities of Los Angeles, Burbank, and Pasadena were reviewed. Based on this review, the following projects were identified for consideration within the cumulative impact analysis for the Project:

- Scholl Canyon Landfill Expansion Project – The City of Glendale is proposing to increase the life of the Scholl Canyon Landfill and is evaluating two alternative development scenarios to increase capacity of the landfill with construction occurring from 2020 through 2040. A Draft EIR was circulated for public review in March 2014. As this EIR was being prepared, the City of Glendale announced during July 2017 that the City now has no immediate plans to proceed with any expansion of the landfill, and possibly may not proceed with such an expansion for some time, if ever, depending on the success of the City's waste management alternatives. The landfill expansion continues to be included in the list of projects to be considered, given that it had been proposed during the preparation of this EIR, and that it could be proposed again in the future. This inclusion,

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however, is not intended to alter in any way the City's July announcement that it has no immediate plans to proceed with any expansion, and that it may not ever propose such an expansion. This project site is located approximately five-miles southeast of the Project.

- Green Waste Digester Project – The City of Glendale is evaluating approaches to comply with California Assembly Bill 1594, Chapter 719, Sections 40507 and 41781.3, which precludes accounting of green waste used as alternative daily cover in the 50 percent waste diversion by recycling requirements of State law. Use of green waste digesters which would produce methane for use as fuel in vehicles or for power production is being evaluated to meet the requirements of this law by 2020. The location of digesters, if used, has not been determined.
- Biogas Renewable Generation Project - The project would include construction and operation of an approximately 12-megawatt power generation facility on approximately three-acres of land at the Scholl Canyon Landfill. The purpose of the project is to beneficially utilize methane-rich renewable landfill gas as fuel to generate electricity at the landfill where the landfill gas is generated and collected. Construction of the project will occur over a course of approximately 15 to 18 months through implementation of approximately three phases of development: demolition and removal of existing equipment, site grading and construction, and system startup. Construction is expected to be initiated in the second half of 2018. This project site is located approximately five-miles southeast of the Project.
- Silver Lake Reservoir Complex Storage Replacement Project – The Los Angeles Department of Water and Power is constructing the Headworks Reservoir to replace the existing Silver Lake Reservoir Complex in order to comply with State and Federal water quality regulations. The project includes the construction of two buried reservoirs (Headworks East and Headworks West), a 2-MW hydroelectric power plant, and a flow regulating station, as well as ecosystem restoration at the Headworks Spreading Grounds site. The project is scheduled to be completed within four phases. Phase One, the construction on Headworks East, was completed in 2014; Phase Two, construction on Headworks West, is scheduled to be complete in 2022; Phase Three, scheduled to begin in 2019, will include construction of a bypass pipeline, the hydroelectric power plant and the regulating station and is scheduled to complete in 2023; Phase Four, will involve ecosystem restoration of the project site and is scheduled to be complete in 2024. This project site is located approximately two-miles northwest of the Project.

The listing of projects for the cumulative analysis includes projects of a similar nature, but in some cases (such as aesthetics) additional nearby projects that are not of a similar nature that could combine with the project impacts to make a more significant cumulative impact were considered for specific issue areas. In each instance, none of the additional projects would combine with this Project to make a greater impact.

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4.11.3 Aesthetics Cumulative Impacts

The geographic scope of the potential cumulative impacts with respect to aesthetics is usually limited to areas within the same viewshed as the Project. Therefore, visual resource impacts of the related projects are site-specific and would not result in a cumulative impact with other projects if they are not in the same viewshed.

With the implementation of the mitigation measures described herein, the Project would have a less than significant impact on aesthetic resources. Furthermore, the Project would be required to comply with the design review guidelines outlined in the City's Municipal Code. The nearest past, current, and probable future projects occurring near the Project range from approximately 2 to 5 miles from the Project. Due to the distance spatial relationships, development of the Project would not combine with these nearby projects. The Project would not contribute a cumulatively considerable aesthetic impact, and cumulative aesthetics impacts as a whole would be less than significant.

Level of Significance before Mitigation:

Less than Significant Impact

Mitigation Measures:

No mitigation is required

Level of Significance after Mitigation:

Less than Significant Impact

4.11.4 Air Quality Cumulative Impacts

The overall air quality impacts of the Project are expected to be below significance thresholds. The daily mass emissions during the construction phase of the Project were estimated not to exceed the construction mass daily significance thresholds for the criteria pollutants.

Air dispersion modeling was conducted to analyze the air quality impacts of the Project during commissioning and commercial operation phase for criteria pollutants and Toxic Air Contaminants. The model demonstrates that criteria pollutants emissions will not exceed state and federal ambient air quality standards outside the facility boundary. Additionally, the model shows Toxic Air Contaminants emission from the Project will not impact public health at levels exceeding the significance thresholds at any residential and worker receptors outside the facility boundary.

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The Biogas Renewable Generation Project, which consists of constructing a new power generation facility at Scholl Canyon Landfill, may be the closest project that can cause significant contribution to the ambient air quality and health risk. However, the project location is approximately six miles east of the Grayson power plant. Emissions from both projects are not expected to have cumulative impact toward ambient air quality standards and public health, given their distance from each other.

Other significantly large projects in the Basin are not believed to be under consideration for construction. Should such a project exist, however, it would be subject to the SCAQMD regulatory program and permitting standards, including the requirement to minimize emissions through the utilization of BACT, the full mitigation of emissions through offset programs, and demonstrations that the Project would not cause or significantly add to a violation of California or federal ambient air quality standards.

Level of Significance before Mitigation:

Less than Significant Impact

Mitigation Measures:

No mitigation is required

Level of Significance after Mitigation:

Less than Significant Impact

4.11.5 Geology and Soils Cumulative Impacts

Depending on timing for implementation of the projects considered in the cumulative impacts analysis, there could be a temporary increase in the transport, use, storage, and disposal of hazardous materials during demolition and construction of the projects considered in the cumulative impacts analysis. For example, decommissioning and construction of the Project had been scheduled to be completed by 2020¹² while the Scholl Canyon Landfill Expansion Project is not scheduled to begin until 2020 and the Green Waste Digester Project would be required to be implemented by 2020. Consequently, there may be some overlapping construction schedules for these projects if currently anticipated implementation schedules are realized. However, hazardous materials that will be used during decommissioning and construction activities are common to the construction and industrial trade and are regulated in accordance with the California Code of Regulations (CCR) Title 22, 23, 26, & 27, 29 CFR 1910.119, California

¹² As this EIR was being prepared, the City of Glendale announced during July 2017 that the City now has no immediate plans to proceed with any expansion, and possible may not for some time, if ever, depending on the success of the City's waste management alternatives. The landfill expansion continues to be included in the list of projects to be considered, given that it had been proposed during the preparation of this EIR, and that it could be proposed again in the future. This inclusion, however, is not intended to alter in any way the City's July announcement that it has no immediate plans to proceed with any expansion, and that it may not ever propose such an expansion.

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Fire Codes CFR Title 24, and City of Glendale Fire Department Health and Safety code. Additionally, the Project is located five miles from the Scholl Canyon Landfill and there would be no cumulative interaction during decommissioning and construction activities of hazardous materials among the facilities considered in the cumulative impacts analysis. Therefore, the Project would not contribute to cumulatively considerable hazards and hazardous materials impacts during demolition and construction activities.

During operation of the projects considered in the cumulative impacts analysis, hazardous materials would continue to be transported, used, stored, and disposed according to current procedures and in accordance with regulatory requirements. Additionally, the Project is located five miles from the Scholl Canyon Landfill and there would be no cumulative interaction of hazardous materials during operational activities among the facilities considered in the cumulative impacts analysis. Therefore, the Project would not contribute to cumulatively considerable hazards and hazardous materials impacts during operation.

Level of Significance before Mitigation:

Less than Significant Impact

Mitigation Measures:

No mitigation is required

Level of Significance after Mitigation:

Less than Significant Impact

4.11.6 Greenhouse Gases Cumulative Impacts

By complying with the State cap-and-trade program, including the full offset of GHG emissions, the Project will result in a net zero increase in GHG emissions. Therefore, the Project will not contribute any GHG emissions to any other GHG related projects. The GHG cumulative impacts of this Project would be less than significant.

Level of Significance before Mitigation:

Less than Significant Impact

Mitigation Measures:

No mitigation is required

Level of Significance after Mitigation:

Less than Significant Impact



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4.11.7 Hazards and Hazardous Materials Cumulative Impacts

Depending on timing for implementation of the projects considered in the cumulative impacts analysis, there could be a temporary increase in the transport, use, storage, and disposal of hazardous materials during demolition and construction of the projects considered in the cumulative impacts analysis. For example, decommissioning and construction of the Project had been scheduled to be completed by 2020¹³ while the Scholl Canyon Landfill Expansion Project is not scheduled to begin until 2020 and the Green Waste Digester Project would be required to be implemented by 2020. Consequently, there may be some overlapping construction schedules for these projects if currently anticipated implementation schedules are realized. However, hazardous materials that will be used during decommissioning and construction activities are common to the construction and industrial trade and are regulated in accordance with the California Code of Regulations (CCR) Title 22, 23, 26, & 27, 29 CFR 1910.119, California Fire Codes CFR Title 24, and City of Glendale Fire Department Health and Safety code. Additionally, the Project is located five miles from the Scholl Canyon Landfill and there would be no cumulative interaction during decommissioning and construction activities of hazardous materials among the facilities considered in the cumulative impacts analysis. Therefore, the Project would not contribute to cumulatively considerable hazards and hazardous materials impacts during demolition and construction activities.

During operation of the projects considered in the cumulative impacts analysis, hazardous materials would continue to be transported, used, stored, and disposed according to current procedures and in accordance with regulatory requirements. Additionally, the Project is located five miles from the Scholl Canyon Landfill and there would be no cumulative interaction of hazardous materials during operational activities among the facilities considered in the cumulative impacts analysis. Therefore, the Project would not contribute to cumulatively considerable hazards and hazardous materials impacts during operation.

Level of Significance before Mitigation:

Less than Significant Impact

Mitigation Measures:

No mitigation is required

¹³ As this EIR was being prepared, the City of Glendale announced during July 2017 that the City now has no immediate plans to proceed with any expansion, and possible may not for some time, if ever, depending on the success of the City's waste management alternatives. The landfill expansion continues to be included in the list of projects to be considered, given that it had been proposed during the preparation of this EIR, and that it could be proposed again in the future. This inclusion, however, is not intended to alter in any way the City's July announcement that it has no immediate plans to proceed with any expansion, and that it may not ever propose such an expansion.

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Level of Significance after Mitigation:

Less than Significant Impact

4.11.8 Hydrology and Water Quality Cumulative Impacts

Depending on timing for implementation of the projects considered in the cumulative impacts analysis, there could be a temporary increase in the transportation of suspended solids eroded from areas of exposed soil during demolition and construction of the projects considered in the cumulative impacts analysis. For example, decommissioning and construction of the Project is scheduled to be completed by 2020 while the Scholl Canyon Landfill Expansion Project had not previously been scheduled to begin until 2020¹⁴ and the Green Waste Digester Project would be required to be implemented by 2020. Consequently, there may be some overlapping construction schedules for these projects if currently anticipated implementation schedules are realized. However, such sediment transport during decommissioning and construction activities are common to such construction projects and implementation of the measures included in the Project's SWPPP will further minimize potential for substantial impacts to water quality. Additionally, the Project is located five miles from the Scholl Canyon Landfill and there would be no significant cumulative interaction during decommissioning and construction activities of stormwater runoff among the facilities considered in the cumulative impacts analysis. Therefore, the Project would not contribute to cumulatively considerable water quality impacts during demolition and construction activities.

As noted above, the Grayson facility's recycled water and stormwater management systems will be improved as a component of the Project. As such, operation of the Project will not contribute to cumulative water quality impacts when combined with the projects considered in the cumulative impacts analysis. Additionally, the Project is located five miles from the Scholl Canyon Landfill and there would be no significant cumulative interaction of stormwater runoff during operational activities among the facilities considered in the cumulative impacts analysis. Therefore, the Project would not contribute to cumulatively considerable water quality impacts during operation.

Level of Significance before Mitigation:

Less than Significant Impact

¹⁴ As this EIR was being prepared, the City of Glendale announced during July 2017 that the City now has no immediate plans to proceed with any expansion of the landfill, and possibly may not proceed with such an expansion for some time, if ever, depending on the success of the City's waste management alternatives. The landfill expansion continues to be included in the list of projects to be considered, given that it had been proposed prior to the preparation of this EIR, and that it could be proposed again in the future. This inclusion, however, is not intended to alter in any way the City's July announcement that it has no immediate plans to proceed with any expansion, and that it may not ever propose such an expansion.

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Mitigation Measures:

No mitigation is required

Level of Significance after Mitigation:

Less than Significant Impact

4.11.9 Noise Cumulative Impacts

The nearest cumulative project considered in this analysis is located approximately two miles from the Grayson Power Plant. Because of the distance between the Project to the other projects evaluated in this analysis, potential cumulative noise impacts would be less than significant.

Level of Significance before Mitigation:

Less than Significant Impact.

Mitigation Measures:

No mitigation is required.

Level of Significance after Mitigation:

Less than Significant Impact.

4.11.10 Transportation and Traffic Cumulative Impacts

Approved and Pending Projects

The Traffic and Circulation Study completed for the Project evaluated approved and pending projects in the Project vicinity. Review of the City of Glendale Community Development – Current Projects list indicates that there are no approved or pending development projects proposed that would add traffic to the study area in the near future. The Disney Grand Central Creative Campus (GC3) Project, a long-range redevelopment master plan for the Grand Central Business Center located north of the Project site, is ongoing with an updated buildout schedule of 2035. However, no current replacement or rehabilitation projects are currently underway that would result in traffic additions by 2020.

Doran Street and Broadway/Brazil Grade Separation Project

The Los Angeles County Metro in cooperation with the cities of Glendale and Los Angeles, the SCRRA, and the California High Speed Rail Authority (CHSRA), has programmed a grade separation project that addresses safety and mobility at the existing at-grade railroad crossings



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at Doran Street and Broadway/Brazil Street. The project consists of an interim safety improvement and several ultimate improvements:

- Interim safety improvement:
 - Widening of west leg at Doran Street railroad crossing to the north and installation of a raised median;
 - Conversion to guarded crossing and installation of advanced traffic signal for eastbound traffic; and
 - Striping improvements.

- Ultimate grade separation improvements:
 - Closure of the Doran Street and Broadway/Brazil Street at-grade crossings;
 - Construction of an overpass from Sperry Street to Salem Street; and
 - Extension of West San Fernando Road from Doran Street to Fairmont Ave (Fairmont Connector).

The interim safety improvement at the Doran Street crossing is programmed to be constructed between June 2018 to February 2019. The crossing will be open during this construction period, except for an approximate six-week period when median construction and railway work necessitate roadway closure. The ultimate improvements are scheduled to commence in November 2020 and be completed in December 2022.

Construction of the interim safety improvement at the Doran Street crossing is scheduled from June 2018 to April 2019; coinciding with the demolition phase (June 2018 to March 2019) and the first month of the construction phase of the Project. The Project personnel calculations indicate that during this period, the number of demolition and construction personnel would be between 25 and 60 personnel on a daily basis. Parking demand generated by these personnel would be accommodated entirely on the Glendale Water & Power Utility Operation Center. It is not expected that the temporary parking lot would be utilized extensively until October 2019. The interim safety improvement was therefore assumed to be in place for the Project 2020 analysis.

The start of construction of the ultimate grade separation improvements (November 2020) coincides with the end of the construction phase (December 2020) and commissioning phase (January 2021 to May 2021) of the Project. The number of construction personnel and commissioning personnel during this period would be 100 personnel during November and December, and 25 to 35 personnel thereafter. The start of construction of the ultimate grade separation improvements could potentially impact access to the temporary parking lot on Doran Street, which may remain in operation during November and December 2020.

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Level of Significance before Mitigation:

Potentially significant impact.

Mitigation Measures:

TRA-9: The temporary parking lot on Doran Street is served by two driveways. To provide for sufficient spacing from the railroad tracks and sufficient queuing capacity, the driveway adjacent to the railroad tracks will be limited to entry only and the driveway located 400 feet west of the railroad tracks will be limited to exit only.

Level of Significance after Mitigation:

Impacts related to transportation and traffic during the demolition, construction and commissioning phases would be less than significant after implementation of mitigation measures.

4.11.11 Tribal Cultural Resources Cumulative Impacts

Cumulative impacts of the Grayson Repowering Project, the Scholl Canyon Landfill Power Project, and the Scholl Canyon Landfill Digester Project would have no impact after mitigation to tribal cultural resources.

Level of Significance before Mitigation:

No impact.

Mitigation Measures:

No mitigation is required.

Level of Significance after Mitigation:

No Impact.