

# FINAL ENVIRONMENTAL IMPACT REPORT GRAYSON REPOWERING PROJECT

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## 6.0 OTHER CEQA

This section considers and discusses other topics identified in the State CEQA Guidelines, including the potential for the Project to induce growth and the identification of irreversible impacts.

### 6.1 GROWTH INDUCING IMPACTS

Section 15126.2(d) of the CEQA Guidelines requires discussion of the ways by which a project may directly or indirectly foster spatial, economic, or population growth, including factors that would remove obstacles to such growth. This discussion should include characteristics of the project that may facilitate other activities that might significantly affect the environment. Growth should not be considered either beneficial or detrimental. It should also not be considered of little significance. The purpose of this Section is to evaluate the growth inducing potential and impact of the Project.

In general, a project may foster spatial, economic, or population growth if it meets any one of following criteria.

- Removal of an impediment to growth (e.g., establishing an essential public service or providing new access to an area)
- Economic expansion or growth (e.g., constructing additional housing, growth in employment)
- Establishment of a precedent-setting action (e.g., innovating, changing zoning)
- Development or encroachment in an isolated or adjacent area of open space (being constructed on a greenfield)

Should a project meet any of these criteria, it can be considered growth inducing. An evaluation of this Project compared against these growth-inducing criteria is provided in the following.

#### 6.1.1 Removal of an Impediment to Growth

Growth in an area may result from removing physical impediments or restrictions to growth, as well as removing planning impediments caused by land use plans and policies. Physical growth impediments may include nonexistent or inadequate access to a site or a lack of essential public services, such as water. Planning impediments may include restrictive zoning and/or general plan designations.

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The Project involves repowering the existing Grayson Power Plant which is located on industrial zoned land. The Project does not involve a land use or zone change, general plan amendment. The purpose of the Project is to replace old, inefficient, and unreliable power generation equipment with modern, efficient, and reliable power generation at the same site. The existing power generation units have met or exceeded their expected lifespans and have become increasingly unreliable and cost-prohibitive to maintain. The Project would result in replacing an existing source of power generation to maintain existing and projected electricity demand and reliability within Glendale covering the 20-year Integrated Resource Plan period from 2015 to 2035 (Pace Global, 2015). Potable and recycled water "Will Serve" letters issued for the Project are included in Appendix B. The Project would result in the consumption of less potable water compared to existing conditions as the Project proposes to use recycled water for generation process water needs. The Project does not include development outside the existing Grayson Power Plant boundary, including connections with existing utility infrastructure to serve the Project.

### 6.1.2 Economic Growth

The second criterion by which induced growth can be measured involves economic factors. In the short-term, the Project would provide construction and remediation employment opportunities. Long-term growth is not expected to occur, as the Project primarily aims to updating existing infrastructure. Therefore, the Project should not be considered growth inducing.

### 6.1.3 Precedent-Setting Action

~~Changes from the Project that could be precedent setting include are few. The most notable precedent setting actions are the adoption of potentially utilizing biogas in an urban setting, which involves combusting and producing electricity at the landfill site, thereby gaining the ability to remove the approximately five-mile pipeline between the landfill and the Project site. Such a decommissioning could set a precedent for other cities to do the same.~~

~~Other potentially precedent setting actions of the Project is the contribution the Project would make toward the City of Glendale's effort to meet the State's Renewable Energy Standard Mandate. Successful implementation of the Project would serve as an example to other cities and power plants within the State of California to follow in its footsteps.~~

### 6.1.4 Development on Isolated or Adjacent Area of Open Space

The Project involves the modernization of an existing power plant, that has operated on the industrial zoned land since 1941. The Project does not include development outside the existing Grayson Power Plant boundary. The Project does not include development or encroachment in an isolated or adjacent area of open space.

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## **6.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES**

Section 15126.2(c) of the CEQA Guidelines requires an evaluation of significant irreversible environmental changes that would be caused by implementing a project.

Power plants, by their nature, consume limited, slowly renewable, and non-renewable resources. This consumption occurs during the construction phase, and continues throughout the operational lifetime. Project operation would require: the consumption of natural gas ~~and~~ biogas for the purpose of power generation, building material, fuel and operational materials and resources, and the transportation of goods and people to and from the Project site.

Construction of the Project would involve the consumption of resources that are non-renewable or those that renew so slowly they should be considered non-renewable. These resources would include the following construction supplies: the sand, gravel and stone found in concrete and asphalt, steel, copper, and lead, and petrochemical materials such as plastics. Nonrenewable fossil fuels such as gasoline and oil would be consumed by construction vehicles, transportation vehicles, and equipment.

### **6.2.1 Irreversible Commitment of Resources**

Most of the facilities located at the Grayson Power Plant, with exception of Unit 9 (built in 2003), were completed between 1941 and 1977. The Projects proposes for these facilities to be replaced with more reliable, efficient, flexible, and cleaner units and other related infrastructure. The Project proposes to replace 238 MW from the boiler units (Units 3, 4, 5) and combined cycle units (Units 1, 2, 8A and 8BC) with more efficient generating facilities. Unit 9 commissioned in 2003, would remain. The Project would comprise of two 50 MW simple cycle units and two 75 MW one-on-one combined cycle units. The Project also proposes to remove existing above- and below-ground equipment, and facilities and building new generation facilities.

Due to the increase in power generation capacity the Project would provide, an irreversible commitment of increased resources would occur if the City of Glendale grows significantly. However, the demand for all resources is expected to increase (if assumption consumption patterns remains the same) regardless of whether the Project commences. The State Department of Finance indicates that the population of Southern California will increase 62 percent over the 30-year period between 1990 and 2020. Such an increase population would directly result in the need for more retail, commercial, and residential facilities, all of which require a power supply.

While the proposed repowering of the Grayson Power Plant is considered necessary to meet current and future City energy needs and California Renewables Portfolio Standard requirements, the Project represents a commitment to nonrenewable resources over the long term. Pursuant with Senate Bill 350, the Renewables Portfolio Standard requires retail sellers and publicly owned utilities including the Glendale Department of Water and Power to procure at

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least 50 percent of their electricity through renewable energy by 2030. The City currently serves its power system through a combination of renewable energy sources (both local and imports), non-renewable imports, and local generation. While the Project does include more efficient use of biogas, and the City's commitment City remains committed to SB 350, natural gas is still the main source of electrical generation at the Project site.

**6.2.2 Irreversible Environmental Changes**

Irreversible long-term environmental changes associated with the Project would include a change in the visual character of the site. The Project would result in short-term noise and vibration impacts during construction. However, the Project is already located in an urban area and the Project area is already used for electrical generation. With repowering, the Project is not expected to increase the amount of air quality impacts. Therefore, there are few environmental variations that are expected to occur.

**6.2.3 Potential Environmental Damage from Accidents**

The Project is expected to be reliable, and be able to account for the City of Glendale's power needs. The repowering is expected to be safer than the current operations, reducing the chance of an accident to occur.

The Project site is located within a seismically active region and would be exposed to ground shaking during an earthquake. Conformance with the regulatory provisions of the City of Glendale, the California Building Code (CBC), and all other applicable building codes pertaining to construction standards would minimize, to the extent feasible, damage, and injuries in the event of such an occurrence.

**6.3 EFFECTS FOUND NOT TO BE SIGNIFICANT**

Based on the findings of the Initial Study, the following environmental impact analysis were determined to be effects found not to be significant.

Issues	Less Than Significant Impact	No Impact
<b>AESTHETICS: Would the Project:</b>		
<b>a) Have a substantial adverse effect on a scenic vista?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The Project site is zoned for industry and is within the City of Glendale at 800 Air Way, Glendale, CA 91201, just northeast of the Interstate 5 and Highway 134 interchange. The site has a flat topography and is bounded to the south by the Verdugo Wash and Highway 134, to the west by the Los Angeles River and Interstate 5, to the north by commercial property and to the east by commercial property and then residential property. No scenic vistas, as identified in the City's Open Space and Conservation Element		



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Issues	Less Than Significant Impact	No Impact
(City of Glendale 1993), exist within or in proximity to the Project site. Therefore, there would be no impact on a scenic vista.		
b) <b>Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
According to the City of Glendale General Plan established by Caltrans "California Scenic Highway Mapping System," there are no state scenic highways located adjacent to, or within view of, the Project site. Therefore, no impacts to scenic resources within a state scenic highway would occur.		
<b><u>AGRICULTURE AND FORESTRY RESOURCES:</u> Would the Project:</b>		
a) <b>Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
There is no existing prime farmland, unique farmland, or farmland of statewide importance within or adjacent to the Project site and no agricultural activities take place on the Project site. No agricultural use zone currently exists within the City of Glendale, nor are any agricultural zones proposed. Therefore, no impacts would occur.		
b) <b>Conflict with existing zoning for agricultural use, or a Williamson Act contract?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The proposed property is not in the Williamson Act Conservation Contract database. Because the Project site is not part of a Williamson Act contract, no impacts associated with this issue would occur with development of the Project.		
c) <b>Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526, or timberland zoned Timberland Protection (as defined by Government Code section 51104(g))?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
There is no existing zoning of forest land or timberland in the City of Glendale. Therefore, no impacts to these resources are expected to occur as a result of this Project.		
d) <b>Result in the loss of forest land or conversion of forest land to non-forest use?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
There is no forestland within the City of Glendale. No forestland would be converted to non-forest use under the Project. Therefore, no impacts are expected to occur as a result of this Project.		
e) <b>Involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural use or conversion of forest land to non-forest use?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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Issues	Less Than Significant Impact	No Impact
There is no farmland in the vicinity of or on the Project site. The Project would not result in conversion of farmland to non-agricultural uses. No impacts are expected to occur as a result of this Project.		
<b><u>BIOLOGICAL RESOURCES:</u> Would the Project:</b>		
<b>a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The Project site is located in an urban area on developed land for the existing Grayson Power Plant and does not contain vegetation. The Project would therefore have no direct impact to sensitive plant and wildlife species. Coyote brush scrub ( <i>Baccharis pilularis</i> Shrubland Alliance) and willow thickets ( <i>Salix sp.</i> Shrubland Alliance) vegetation communities were identified in the buffer area, but would not be directly impacted by Project implementation. Therefore, no impacts to sensitive habitats or species would occur from Project implementation.		
<b>b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish or U.S. Fish and Wildlife Service?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The Project site does not contain any riparian habitat or other sensitive natural communities identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service. The Project would eliminate the use of potable water in the generation process by increasing use of recycled water. The Project's use of recycled water is not anticipated to result in a substantial change in the volume of discharges to the Los Angeles River, particularly when considering that the Los Angeles – Glendale Water Reclamation Plant (LAGWRP) is one of many water discharge sources to the Los Angeles River. Therefore, the Project would not impact a riparian habitat or other sensitive natural communities.		
<b>c) Have a substantial adverse effect on federally protected wetlands as defined by Section 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?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The Project Site does not contain wetlands and would not have impacts related to federally protected wetlands as defined by Section 404 of the Clean Water Act. The Project is adjacent to the Los Angeles River and would have no substantial change to hydrological conditions to receiving waters. Therefore, the Project would have no impact on wetlands.		
<b>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?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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Issues	Less Than Significant Impact	No Impact
<p>The Project site does not contain rivers, creeks, or waterways. The Project is located entirely within the existing Grayson Power Plant Site and surrounded by urban uses and wildlife species are unlikely to use the Project site as a migratory corridor due to the urban and industrial nature of the surrounding areas. As a result, the Project would have no impact on the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors.</p>		
<p><b>e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?</b></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>The Project would occur on developed land with poor quality habitat to support biological resources. The Project would not result in removal of vegetation or trees nor would it involve an activity that has the potential to substantially reduce the volume of discharges to the Los Angeles River from the LAGWRP that could adversely affect biological resources in the Los Angeles River. The Project would have no impact.</p>		
<p><b>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?</b></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>According to the Glendale General Plan, there is no habitat conservation plan or natural community conservation plan in the City of Glendale. There is a Significant Ecological Area (SEA) within the Verdugo Mountains, which is implemented with the intention to preserve designated sensitive areas. However, the Project is not located within the SEA. As such, implementation of the Project would not conflict with the SEA program or other habitat conservation plans. No impact would occur.</p>		
<p><u>CULTURAL RESOURCES:</u> <b>Would the Project:</b></p>		
<p><b>a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?</b></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Based on previous studies and the 2016 Resource Study, the Project would not cause a substantial adverse change to the significance of historical resources as defined in Section 15064.5, nor would the Project have impacts on significant local resources as defined in Chapter 15.20 of the City of Glendale Municipal Code. However, there is always a possibility that buried historic, cultural, or paleontological deposits could be found during construction and earth disturbing activities. In the event, buried historic, cultural, or paleontological deposits are discovered, regulatory compliance of State Health and Safety Code Section 7050.5 and Public Code Resources Code Section 5097.98 would be implemented. There would be no impact to historical resources.</p>		
<p><b>b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?</b></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>The potential to encounter archaeological resources appears to be very low because the Project area has been previously disturbed and altered by construction of the existing Grayson Power Plant. There were no archaeological resources identified during the 2003 survey and no other archaeological resources were documented within or adjacent to the Project area. Based on the findings in this study, the Project would not cause a substantial adverse change to the significance of archaeological resources as defined in Section 15064.5, nor would the Project have impacts on significant local resources as defined in Chapter 15.20 of the City of Glendale Municipal Code. However, there is always a possibility that buried historic, cultural, or paleontological deposits could be found during construction and earth disturbing activities. Therefore, in the event archeological resources are discovered, regulatory</p>		

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Issues	Less Than Significant Impact	No Impact
compliance of State Health and Safety Code Section 7050.5 and Public Code Resources Code Section 5097.98 would be implemented. This would be a less than significant impact.		
<b>c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
While the Project would be constructed in an area that has been considerably disturbed and/or altered, any extensive ground disturbing activities have the potential to encounter geologic formations that could potentially contain paleontological resources. In the event that potential paleontological resources are encountered during construction activities, all work must stop and a qualified paleontologist should be contacted immediately to assess the significance of the new find. Additionally, the following may be implemented in order to ensure that impacts are less than significant: 1) worker education training for all construction personnel regarding the significance of paleontological resources; 2) monitoring during construction by a qualified paleontologist; 3) screening of sediment samples for small fossil remains; 4) documentation and identification of newly identified resources and their handling. Based on the foregoing, there would be a less than significant impact.		
<b>d) Disturb any human remains, including those interred outside of dedicated cemeteries?</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
There is no evidence to suggest the Project site has been used for human burials. The California Health and Safety Code (Section 7050.5) states that if human remains are discovered onsite, no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98, including coordination with persons to be the descendants of the deceased Native Americans if the remains are identified as prehistoric. Adherence to applicable California Health and Safety Code and Public Resource Code requirements is standard for all Projects. Impacts associated with the disturbance of human remains would be a less than significant.		
<u><b>GEOLOGY AND SOILS:</b></u> <b>Would the Project:</b>		
<b>a) i. Expose people or structures to the 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?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Based on a review of the Map of the State of California Special Studies Zones (Burbank Quadrangle), effective January 1, 1979, the Project site is not identified as being within an Alquist-Priolo Earthquake Fault Zone. As such, no fault rupture impact would result from the implementation of this Project.		
<b>a) ii. Expose people or structures to strong seismic ground shaking?</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
The Project site has the potential to be subject to seismic ground shaking and failure during a major earthquake along the San Andreas Fault. The intensity of the ground shaking would depend on the distance to the epicenter and the geology of the areas between the epicenter and the Project area. Compliance with the seismic design requirements specified by the California Building Code would reduce the potential impacts from seismic ground shaking and ground failure on building occupants and structures to a less than significant level.		
<b>a) iv. Expose people or structures to landslides?</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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<p>According to the United States Geological Survey Map, the area contains no major landforms, is relatively flat, and contains no potential for landslides. Additionally, a review of the State of California Seismic Hazards Zones – Burbank Quadrangle Map (released March 25, 1999) indicates that the Project area is not located within an "Earthquake-Induced Landslides" zone, which is defined as an area where previous occurrence of landslide movement or local topographic, geological, geotechnical, and subsurface water conditions indicate a potential for permanent ground displacement such that mitigation as defined in Public Resources Code Section 2693(c) would be required. Impacts associated with landslides are anticipated to be less than significant.</p>		
<p><b>d) Be located on expansive soil, as defined in the Uniform Building code (2016), creating substantial risks to life or property?</b></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>The Geotechnical Study conducted at the site concluded that the soils are not expansive, as identified in the Uniform Building Code (2016), and do not create substantial risks to life or property. Therefore, development of the Project would have a less than significant impact from shrink/swell potential, subsidence or differential settlement and substantial risks to life or property are not anticipated.</p>		
<p><b>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?</b></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>The Project does not include any new construction of septic tanks or alternative wastewater disposal system. Therefore, there would be no impact.</p>		
<p><b>HAZARDS AND HAZARDOUS MATERIALS: Would the Project:</b></p>		
<p><b>c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?</b></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>The Project site is not located within a quarter mile of an existing school and therefore, does not have the potential to expose students to hazardous emissions such as diesel emissions during construction. Therefore, there would be no impact associated with this issue.</p>		
<p><b>d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?</b></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>The Project site is not included on a list of hazardous materials site identified by Government Code Section 65962.5. The Project site is within the boundary of the initial investigations for the San Fernando Valley Superfund Sites, which is an area of contaminated groundwater covering approximately 7 square miles beneath the North Hollywood neighborhood of the City of Los Angeles and the City of Burbank. The use of an alternate water supply and the operation of the groundwater treatment system in the North Hollywood and Burbank areas have reduced the potential of exposure to contaminated drinking water at the San Fernando Valley site and will continue to protect residents near this site while additional cleanup activities are planned and implemented. Regardless, the Project is not expected to result in encountering potentially impacted groundwater. Therefore, there would be no impact associated with this issue.</p>		

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<p><b>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?</b></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>There is no public airport or public use airports within the vicinity of the Project site. The Project site is not located within the Air Installation Compatible Use Zone (AICUZ). Therefore, the Project would not result in a safety hazard for people utilizing or working within the Project area. No impact would occur.</p>		
<p><b>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?</b></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>The Project site is not located within the vicinity of a private airstrip or heliport. Consequently, no impacts associated with this issue would occur.</p>		
<p><b>g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?</b></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>The Project would be designed, constructed, and maintained in accordance with applicable standards associated with vehicular access, resulting in the provision of adequate vehicular access that would provide for adequate emergency access and evacuation. Construction activities that may temporarily restrict vehicular traffic would be required to implement adequate and appropriate standards to facilitate the passage of persons and vehicles through/around any required road closures. Adherence to these standards would reduce potential impacts related to this issue to a less than significant level.</p>		
<p><b>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?</b></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>The Project site is not located within the wildfire hazard zone as specified by the City of Glendale General Plan. Areas surrounding the Project site consist of urban development with minimal ground cover or vegetation. Because of lack of abundant vegetation and the amount of industrial development within the vicinity of the Project site, on-site and adjacent areas do not have the capability to support a wildfire. Therefore, the Project does not have the potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires. No impact would occur.</p>		
<p><u>HYDROLOGY AND WATER QUALITY:</u> <b>Would the Project:</b></p>		
<p><b>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?</b></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>There are currently two water wells on the Project site and the Grayson Power Plant uses approximately 20-acre feet of well water per year. The Project would entirely utilize recycled water for generation process cooling thereby limiting groundwater use to domestic consumption by the plant staff and for emergency generation process cooling in the event service of recycled water from the Los Angeles-</p>		

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<p>Glendale Water Reclamation Plant was interrupted. As a result, operation of the Project would utilize less groundwater and contribute more to groundwater recharge compared to existing Grayson Power Plant operation. Operation of the Project would therefore have a beneficial impact to groundwater resources. Construction of the Project does not include any component with the potential to deplete groundwater supplies or interfere substantially with groundwater recharge and would therefore have no impact.</p>		
<p><b>d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?</b></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>The Project would include redevelopment of an existing site land use and equivalent amount of impervious surface subject to sheet flow. The Project also includes a stormwater infiltration component to improve site drainage and groundwater recharge potential compared to existing Grayson Power Plant operation. Operation of the Project would not substantially alter the existing drainage pattern of the site or area or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Project construction does not include a component with the potential to increase surface runoff in a manner that would result in on- or off-site flooding. No impact related to this issue is anticipated to occur.</p>		
<p><b>f) Otherwise substantially degrade water quality?</b></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>The Project does not include a component with the potential to otherwise substantially degrade water quality. No impact would occur.</p>		
<p><b>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?</b></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>The Project is not within a 100-year flood hazard area as identified on the Flood Insurance Rate Map (FIRM; Panel 06037C1345F, effective 9/26/2008) generated by the Federal Emergency Management Agency (FEMA). The Project is also not within a 100-year Los Angeles River overtopping flood hazard area identified by the US Army Corps of Engineers Hydraulics and Floodplain Analysis of the Los Angeles River (US Army Corps of Engineers, 2016). The 2016 US Army Corps analysis indicates that overbank flow during a 100-year and 500-year storm event would impact Ferraro Fields on the southwest side of the Los Angeles River would not flood the Project site located on the opposite (northeast) side of the river. In addition, the Project does not involve the construction of housing. Therefore, the Project would not place housing within a 100-year flood hazard area. No impact related to this issue is anticipated to occur.</p>		
<p><b>h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?</b></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>See above. No impacts would occur.</p>		
<p><b>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?</b></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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<p>There are no levees or dams within the vicinity of the Project site according to the City of Glendale General Plan and the Project site is not located within an inundation area or within the 100-year Los Angeles River overtopping area identified by the US Army Corps of Engineers. Therefore, the Project would have no impact related to the exposure of people or structures to flooding risks, including flooding as a result of the failure of a levee or dam.</p>		
<p><b>j) Inundation by seiche, tsunami, or mudflow?</b></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Inundation of the Project site by a tsunami is highly unlikely as the Project site is more than 15 miles from the Pacific Ocean. Because the Project site is not located adjacent to any enclosed bodies of water, no seiche-related flooding is anticipated to occur on-site. Due to the relatively flat topography in the vicinity of the Project site, it is unlikely that a mudflow would impact the site. There would be no impact from inundation, seiche, tsunami, or mud flow.</p>		
<p><u>LAND USE AND PLANNING:</u> <b>Would the Project:</b></p>		
<p><b>a) Physically divide an established community?</b></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>The Project would be replacing existing generating units and ancillary facilities and would not physically divide an established community. The existing power plant is in an industrial area of the City and there are no existing residential uses located on the property. The Project would not entail the displacement of any residential uses or the use of any land designated for residential uses. Therefore, the Project would have no impact and would not disrupt or physically divide an established community.</p>		
<p><b>b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect?</b></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>The Project is consistent with surrounding development and does not conflict with the adopted plans for the purpose of avoiding or mitigating an environmental effect. The Project is a permitted use in the Industrial zone and is not anticipated to conflict with any applicable land use plan. Therefore, the Project would have no impact related to this issue.</p>		
<p><b>c) Conflict with any applicable habitat conservation plan or natural community conservation plan?</b></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>According to the Glendale General Plan, there is no habitat conservation plan or natural community conservation plan in the City of Glendale. There is, however, a Sensitive Ecological Area (SEA) program in the City of Glendale, which is implemented with the intention to preserve these designated sensitive areas. According to the Glendale General Plan, the Grayson Repowering Project site is not located within the established SEA. As such, implementation of the Project would not conflict with the SEA program or other habitat conservation plans. Therefore, the Project would have no impact to local, regional, or State habitat conservation plans.</p>		
<p><u>MINERAL RESOURCES:</u> <b>Would the Project:</b></p>		
<p><b>a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?</b></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>The Project site is located within a substantially industrial area surrounded by existing industrial uses, limiting its potential for mineral resource conservation or extraction. No mineral resource extraction, recovery, or</p>		



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processing activities underway on or adjacent to the Project site. The site is not designated in the City's General Plan or Zoning Code for any extractive use. Implementation of the Project would therefore have no impact on the availability of known mineral resources in the Project vicinity currently available for extraction.		
<b>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?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The Project site is located within a substantially industrial area surrounded by existing industrial uses, limiting its potential for mineral resource conservation or extraction. The Project site is not classified as an area of locally important mineral resource recovery. As such, no impact related to this issue would occur.		
<u>NOISE:</u> <b>Would the Project:</b>		
<b>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?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The Project is not within an airport land use plan. Therefore, no impacts to excessive noise levels as a result of airports in the vicinity of the Project site would occur.		
<b>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?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The Project is not within the vicinity of a private airstrip. Therefore, no impacts to excessive noise levels as a result of private airstrips in the vicinity of the Project site would occur.		
<u>POPULATION AND HOUSING:</u> <b>Would the Project:</b>		
<b>a) Induce substantial population growth in an area, either directly or indirectly?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The Project does not include new residents or extend any major infrastructure that could support additional development. The incremental increase in power would serve existing demand, meet reliability requirements, and allow for increased integration of renewable energy sources into GWP's portfolio to meet RPS requirements. The Project does not include new homes or businesses. No new substantial employment would be generated by the Project that could potentially contribute to additional demand for housing or services in the surrounding area. In addition, the regional area has the required workforce that would commute daily to the Project site and would not require new housing infrastructure. The workforce required to operate the Project would be similar to that required to operate the existing power plant. Therefore, the Project would not have impacts related to population growth.		
<b>b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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<p>The Project would not result in the removal or demolition of any residential units because there are no existing residential units on the property. The Project would not entail the displacement of any residential uses or the use of any land designated for residential uses. No impacts would occur.</p>		
<p><b>c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?</b></p>	<p><input type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>
<p>The Project would not result in the removal or demolition of any existing residential units because there are no existing residential uses on the property. The Project would not entail the displacement of any residential uses or the uses of any land designated for residential use. Therefore, the Project would not have impacts related to the displacement of people.</p>		
<p><u>PUBLIC SERVICES:</u> <b>Would the Project:</b></p>		
<p><b>a) i. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impact, in order to maintain acceptable service ratios for fire protection?</b></p>	<p><input type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>
<p>The Project is required to comply with all Fire Department standards and policies, including installation of public and private fire hydrants as specified by the Glendale Fire Department. The Project would comply with the City's latest standards and will therefore, improve the site's existing conditions. For these reasons, the Project would have no impact.</p>		
<p><b>a) ii. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impact, in order to maintain acceptable service ratios for police protection?</b></p>	<p><input type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>
<p>Existing law enforcement service in the area would adequately meet the demand for police protection services under the Project because repowering of the Grayson Power Plant would not require additional services beyond those currently provided. Therefore, the Project would have no impact.</p>		
<p><b>a) iii. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impact, in order to maintain acceptable service ratios for schools?</b></p>	<p><input type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>
<p>The Project would not adversely impact schools because no population increase or shifts in population would occur as a result of the Project. The Project would not include any residential population or increase the number of employees at the facilities. Therefore, the Project would have no impact.</p>		

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<p><b>a) iv. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impact, in order to maintain acceptable service ratios for parks?</b></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>The Project would not entail the construction of residential or commercial uses that would result in an increase in park usage. The Project is not anticipated to contribute substantially to meet the need for additional parks. Therefore, the Project would have no impact.</p>		
<p><b>a) v. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impact, in order to maintain acceptable service ratios for other public facilities?</b></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>The Project is not anticipated to adversely affect the City's overall ability to provide services Citywide including school and library services. The Project would not create any significant increase in demand for library services. Therefore, the Project would have no impact.</p>		
<p><u>RECREATION:</u> <b>Would the Project:</b></p>		
<p><b>a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?</b></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>The Project would not entail the construction of residential or commercial uses that would result in an increased use of area parks or recreation facilities. There are no increases to the use of existing neighborhood or regional parks or other recreation facilities such that substantial physical deterioration of the facility would occur or be accelerated. Therefore, no impacts related to the physical deterioration of a park associated with the Project would occur.</p>		
<p><b>b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?</b></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>The Project does not include the construction of recreational facilities either on or off the Project property. Therefore, the Project would have no impacts.</p>		
<p><u>TRANSPORTATION AND TRAFFIC:</u> <b>Would the Project:</b></p>		
<p><b>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?</b></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>There are no private airstrips within the vicinity of the Project site. Therefore, the Project would not cause any change in the air traffic patterns during construction or operation. No impact would occur.</p>		

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<b>d) Substantially increase hazards due to a design feature or incompatible uses?</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>The Project would be constructed in the existing boundaries of the Grayson Power Plant in which deliveries of large equipment do not require modifications or changes to existing City streets or state highways. Roadway improvements in and around the Project site have not changed and would continue to satisfy all City requirements for street widths, corner radii, intersection control, and design standards tailored specifically to site access requirements. A less than significant impact would occur.</p>		
<b>e) Result in inadequate emergency access?</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>The Project's emergency access would not change in design from the existing and approved Grayson Power Plant. The Project would be required to be designed, constructed, and maintained to provide for adequate emergency access and evacuation. Construction activities, which may temporarily restrict vehicular traffic, would be required to implement adequate and appropriate measures to facilitate the passage of persons and vehicles through/around any required road closures. The Project design would be submitted to and approved by the City's Fire and Police Departments prior the issuance of construction permits. A less than significant impact related to this issue would occur.</p>		
<b>f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>The Project site is located in an industrial area that contains an extensive network of sidewalks, bike plans, and public transit system. The Project as designed would not conflict with adopted transportation policies as indicated in the City General Plan. No impact associated with this issue would occur.</p>		
<p><u>TRIBAL CULTURAL RESOURCES:</u> <b>Would the Project:</b></p>		
<b>a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Based on previous studies and the 2016 Resource Study, the Project would not cause a substantial adverse change to the significance of historical resources as defined in Section 15064.5, nor would the Project have impacts on significant local resources as defined in Chapter 15.20 of the City of Glendale Municipal Code. However, there is always a possibility that buried historic, cultural, or paleontological deposits could be found during construction and earth disturbing activities. In the event, buried historic, cultural, or paleontological deposits are discovered, regulatory compliance of State Health and Safety Code Section 7050.5 and Public Code Resources Code Section 5097.98 would be implemented. There would be no impact to historical resources.</p>		
<p><u>UTILITIES AND SERVICE SYSTEMS:</u> <b>Would the Project:</b></p>		
<b>a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Wastewater discharge from operation of the Project would be regulated by an Industrial Wastewater Discharge Permit, which establishes pretreatment standards for wastewater effluent prior to discharge into the City of Glendale sewer system. The Grayson Power Plant currently operates under an existing Industrial Wastewater Discharge Permit. The existing Industrial Wastewater Discharge Permit would be modified to</p>		

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<p>address the new process of wastewater generation and treatment from the Project. Compliance with the Industrial Wastewater Discharge Permit requirements would ensure that the Project would not exceed the wastewater treatment requirements of the City of Glendale or RWQCB. Therefore, the project would not exceed wastewater treatment requirements of the applicable RWQCB. No impact associated with this issue would occur.</p>		
<p><b>b) 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?</b></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>The Project will rely on recycled water for generation process cooling and will result in a reduction of groundwater use compared to existing power plant operation. The volume of recycled water necessary for the Project's wet cooling system is within the City's allocation from the Los Angeles-Glendale Water Reclamation Plant that maintains a connection infrastructure with the Grayson Power Plant. The Project may also incorporate on-site water treatment in support of cooling tower operation. The project would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities. No impact associated with this issue would occur.</p>		
<p><b>c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?</b></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>The Project site is located on developed lands with impervious services. Stormwater flows via surface sheet flow to existing localized gutters, catch basins, storm drain piping and outfalls to Verdugo Wash and Los Angeles River. The Project would include redevelopment of an existing site land use and equivalent amount of impervious surface subject to sheet flow. The Project also includes a stormwater infiltration component to improve site drainage and groundwater recharge potential compared to existing Grayson Power Plant operation. The Project would not require or result in the construction of new off-site storm water drainage facilities or expansion of existing facilities. No impact associated with this issue would occur.</p>		
<p><b>d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?</b></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>The Project would eliminate the use of potable water in the generation process by increasing use of recycled water. The potential increase of 230 acre-feet per year of recycled water from the Project is within Grayson's allocation. In addition, the volume of recycled water being used by the City has declined in recent years as golf courses and other large water users have reduced their demand for water. There are sufficient water supplies available to serve the Project from existing entitlements. A less than significant impact associated with this issue would occur.</p>		
<p><b>e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?</b></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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<p>The Project will rely on recycled water from the Los Angeles-Glendale Water Reclamation Plant for generation process cooling. The volume of recycled water necessary for the Project's wet cooling system is within the City's allocation from and treatment capacity of the Los Angeles-Glendale Water Reclamation Plant that maintains a connection infrastructure with the Grayson Power Plant. No impact associated with this issue would occur.</p>		
<p><b>f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?</b></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Similar to existing conditions on the project site, waste generated by operation of existing power generating units and associated facilities would be properly managed and/or disposed of in compliance with federal, state, and local statutes and regulations related to solid and hazardous waste management. Because the Project involves the replacement of the existing generation units and would not increase the number of employees on site, the Project would not result in increased waste disposal over existing conditions. The minimal hazardous waste that would be generated during project construction would be transported to a Class 1 landfill in California. The amount of waste disposed would remain similar to existing conditions and additional capacity would not be required. Therefore, operational impacts of the Project would be less than significant.</p>		
<p><b>g) Comply with federal, state, and local statutes and regulations related to solid waste?</b></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>The Project would be required to comply with applicable solid waste ordinances, and thus, would meet Glendale's and California's solid waste diversion regulations. In addition, the Project would comply with Chapter 8.58 of the Glendale Municipal Code and design requirements for refuse storage areas. Therefore, the Project would follow applicable federal, state, and local statutes and regulations related to solid waste and impacts would be less than significant.</p>		
<p><u>ENVIRONMENTAL JUSTICE:</u> <b>Would the Project:</b></p>		
<p><b>a) Substantially increase project air emissions that disproportionately impact low-income or minority communities in proximity to the project site?</b></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Glendale is not considered an environmental justice community and the Project would therefore not substantially increase project air emissions that disproportionately impact low-income or minority communities in proximity to the project site. No impact associated with this issue would occur.</p>		
<p><b>b) Degrade the health and safety of low-income or minority communities disproportionately?</b></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Glendale is not considered an environmental justice community and the Project would therefore not degrade the health and safety of low-income or minority communities disproportionately. No impact associated with this issue would occur.</p>		
<p><b>c) Fail to provide for or encourage effective participation of low-income or minority communities adjacent to, or in the affected vicinity of, the project area in the environmental review and decision-making process for this project?</b></p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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Glendale is not considered an environmental justice community. No impact associated with this issue would occur.		
<b>d) Cause a disproportionately high and adverse impact on low-income or minority communities adjacent to or in the affected vicinity of the project area?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Glendale is not considered an environmental justice community. No impact associated with this issue would occur.		
<u>SOCIOECONOMICS:</u> <b>Would the Project:</b>		
<b>a) Substantially alter the existing economic characteristics of the vicinity and region affected by construction and operation of the project?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The Project would require a maximum workforce of approximately 250 workers, which would cause no adverse impact on the socioeconomic character of the City of Glendale. The local economics of the City of Glendale would potentially improve with the purchase of local resources and employment of a local workforce. Therefore, the Project would not alter the economic base, fiscal resources, and economic characteristics of the vicinity and region affected by the construction and operation of the Project. There would be no impact.		
<b>b) A substantial decrease in the expenditures for locally purchased materials for the construction and operation phases of the project?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The Project would not substantially decrease the expenditures for locally purchased materials for the construction phase of the Project. In fact, the local economics of the City of Glendale would potentially improve with the purchase of local resources and employment of a local workforce. There would be no impact.		
<b>c) Result in the increase of population and housing caused directly and indirectly by the project?</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The Project would not increase the population and housing of the surrounding Project area by producing more electricity for developing housing Projects within the City of Glendale. The Project would not be producing more electricity. In fact, the Project is repowering the existing Grayson Power Plant. In addition, a potential increase in the number of workers to be employed each month by craft during construction and for operations would not increase the population and housing of the surrounding community. There would be no impact.		

