

CEQA Initial Study

Little Lake Aqueduct Crossover Project

October 2023

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Section 1 Project and Agency Information

1.1 PROJECT TITLE AND LEAD AGENCY

Project Title:	Little Lake Aqueduct Crossover Project
Lead Agency Name:	Los Angeles Department of Water & Power
Load Aganay Addungs	111 North Hope Street, Room 1044
Lead Agency Address:	Los Angeles, California 90012
Contact Person:	Ms. Kathryn Laudeman
Contact Phone Number:	(213) 367-6376
Project Sponsor:	Same as Lead Agency

1.2 PROJECT BACKGROUND AND OBJECTIVES

1.2.1 Background

The City of Los Angeles Department of Water and Power (LADWP) is proposing to construct the Little Lake Aqueduct Crossover Project (LAA Crossover Project, proposed project) to connect the First Los Angeles Aqueduct (LAA1) and Second Los Angeles Aqueduct (LAA2) in Rose Valley, California (Figure 1). Once installed, the 60-inch diameter LAA Crossover pipe will allow water to be diverted from LAA1 into LAA2.

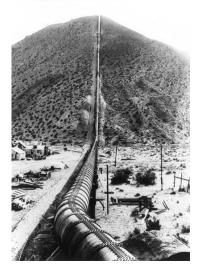
Inspection and maintenance activities on the LAA1 currently take the facility out of service for approximately 117 days per year. During outages, flow interruptions in the LAA1 prevent power generation at the Haiwee Power Plant. The proposed project will allow water to flow through Haiwee Power Plant to generate approximately 3,150 megawatt hours of additional power per year. The LAA Crossover Project will also increase operational flexibility by approximately doubling the existing water flow capacity from South Haiwee Reservoir through LAA2.

LADWP has prepared this Initial Study (IS) to address the impacts of construction and operation of the LAA Crossover Project. The IS has been prepared in accordance with the California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et seq., and the State CEQA Guidelines, Title 14 California Code of Regulations (CCR) Section 15000 et seq. The IS identifies the site-specific impacts, evaluates their potential significance, and determines the appropriate document needed to comply with CEQA. For this project, LADWP has determined, based on the information reviewed and contained herein, that the proposed project would not have a significant environmental impact with mitigation measures incorporated into the project. Based on this IS, a Mitigated Negative Declaration (MND) is the appropriate CEQA document for evaluating the potential environmental impacts of the LAA Crossover Project.

1.2.1.1 Los Angeles Aqueduct

Completed in 1913 after 5 years of construction, LAA1 has a capacity of 485 cubic feet per second (cfs) and conveys water 233 miles from the Owens Valley to the Lower San Fernando Reservoir in the northern area of the City of Los Angeles (Figure 2). Operated under unpressurized conditions, the LAA1 system includes lined and unlined open channel, concrete conduit, lined tunnels, and steel and concrete pipe. Completed in 1970, LAA2 has a capacity of 290 cfs and conveys water in concrete conduit and steel pipe 137 miles, from the Merritt Diversion Structure at the junction of the North and South Haiwee Reservoirs to the North Portal of the Elizabeth Tunnel near the Fairmont Reservoir in northern Los Angeles County. LAA2 operates under pressurized conditions.





1.2.1.2 Haiwee Power Plant

The last of the Aqueduct power plants in the Owens Valley, the Haiwee Power Plant is located at the base of a drop in the Aqueduct, downstream of the Haiwee Reservoirs. The following is a select timeline of events relevant to the LAA1 and Haiwee Power Plant:

- 1913 To meet water supply demands in the city of Los Angeles, the LAA1 was completed, and storage of Owens River water began at North and South Haiwee Reservoirs. An inline hydroelectric plant was proposed as part of the original construction, and the intake tower and tunnel within the dam were constructed. However, the powerhouse was not designed in time, and an open bypass channel was constructed around the section where the proposed powerhouse and penstock were to be located.
- 1913 Los Angeles residents received their first deliveries of water from the LAA1.
- 1917 Installed from the base of the dam, the upper 1,600 feet of the Haiwee Penstock was constructed and connected to a small hydroelectric unit.

- 1926 The penstock was extended to approximately 10,000 feet, made primarily of 102-inch diameter coated and lined, riveted steel pipe, connecting to two 2.5 megawatt (MW) hydroelectric units; the old unit was removed from service.
- 1970 Rose Valley LAA2 was constructed and a wye branch (three openings) connection was made to the Haiwee penstock at the location of the old hydroelectric unit.

1.2.2 Project Objective

The objective of the LAA Crossover Project is to increase the functionality and flexibility of the LAA system. The goal of the project is to install a water conveyance connection between the first and second LAAs to allow the Haiwee Power Plant to continue power generation while the LAA1 is out of service for maintenance and unforeseen emergencies.

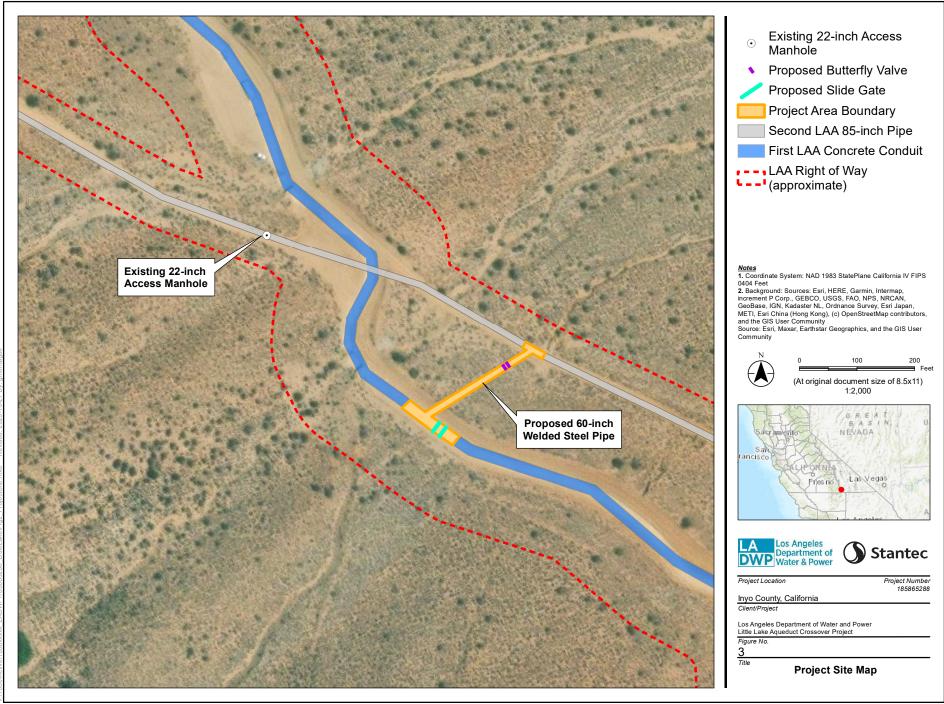
1.3 PROJECT LOCATION AND ENVIRONMENTAL SETTING

The crossover pipeline will be installed in the Rose Valley of Inyo County, California, east of the Sierra Nevada and west of the Coso Range (Figure 1). Located approximately 25 miles south of Olancha and 25 miles northwest of Ridgecrest, the project site is located west of Little Lake reservoir. Little Lake is a perennial manmade lake sustained by springs, approximately 90 acres in surface area and 3 to 5 feet deep (Nilssen and Bevill 2017). Accessed via Highway 395, the project is located on the Little Lake, California 1983 United States Geological Survey (USGS) 7.5-minute quadrangle map. The site is in Township 23S, Range 37E, Section 1.

The climate of the Rose Valley is hot and arid with average precipitation of 5 inches a year. Water sources in the area consist of perennial springs fed by groundwater, ephemeral streams and washes, as well as manmade lakes and reservoirs. The project site elevation is approximately 3,500 feet above mean sea level (msl), with the area sloping slightly to the east. Onsite vegetation (upland desert scrub) is dominated primarily by a mix of shrubs, including creosote bush (*Larrea tridentata*), white bursage scrub (*Ambrosia dumosa*), and blackbrush (*Coleogyne ramosissima*). Surface sediments consist of younger Quaternary alluvial deposits of sand, silt, and gravel with older alluvial fan deposits in the project vicinity (Dibblee and Minch 2008).

The crossover will be installed within the boundaries of the 250-foot wide LAA1 Bureau of Land Management (BLM) right-of-way (ROW) and 100-foot wide LAA2 BLM ROW in between two graded roads used to access the LAA1 and LAA2 (Figure 3). For the LAA1, the City was granted the right-of-way on June 30, 1906:

"...not to exceed two hundred and fifty feet in width, over and through the public lands of the United States in the Counties of Inyo, Kern and Los Angeles, State of California, and over and through the Sierra and Santa Barbara Forest Reserve and the San Gabriel Timber Land Reserve, in said State, for the purpose of constructing, operating and maintaining canals, ditches, pipes and pipe lines, flumes, tunnels and conduits for conveying water to the City of Los Angeles, and for the purpose of constructing, operating and maintaining power and electric plants, poles and lines for the generation and distribution of electric energy..."



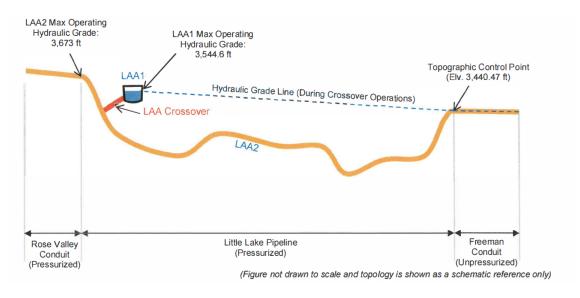
PROJECT DESCRIPTION

The proposed project would connect the LAA1 (concrete conduit) and LAA2 (riveted steel pipeline) through installation of approximately 183 feet of 60-inch diameter pipe. The LAA Crossover Project description includes:

- Pipe material will be determined during design based on factors including pressure, constructability, operational requirements, seismic requirements, installation, cost and procurement durations. Welded-steel pipe will be considered.
- An isolation structure will be installed on the LAA1 downstream of the LAA Crossover connection. This structure will include two sets of slide gates and reinforcement of the LAA1 required for installation of the slide gates.
- Two 60-inch diameter butterfly valves will be installed on the Crossover pipeline to prevent back flow into the LAA1 when the LAA2 is in service.
- A new crossover pipe would be added below grade and a new mechanical platform would be constructed atop the replacement segment of the LAA1.
- The LAA Crossover will connect to the existing LAA1 downstream of the LAA1-LAA2 intersection point. A new connection structure will be installed to allow for the connection of the LAA Crossover pipeline to the LAA1 concrete channel.
- The LAA Crossover connection to LAA2 would be located downstream of the LAA1-LAA2 intersection. The LAA2 connection will be a pipe to pipe connection.
- Galvanic cathodic protection system will be installed for corrosion control.

Operating Criteria. The flow capacity through the LAA Crossover will be limited by a topographical control point of the Little Lake Pipeline which has a centerline elevation of 3,440.47 feet above msl. Under normal operations, LAA2 operates at a higher hydraulic grade than LAA1, preventing operation of the LAA Crossover while LAA2 is in service. Flow through the LAA Crossover will not exceed 145 cfs to maintain freeboard in LAA1. Figure 4 presents a hydraulic schematic.

Figure 4. LAA Crossover Project Hydraulic Schematic



1.3.1 Project Construction

Construction for the proposed project will include excavation, demolition of select sections of the existing LAA, and installation of new facilities. In general, the construction sequence would be as follows:

- Excavation and removal of 23 ft section of LAA2
- Installation of new section with outlet wye to 60-inch crossover pipe
- Installation of crossover pipe to two butterfly values
- Use butterfly valves as double block and continue excavation for installation of 60-inch crossover pipe to just before LAA1
- Excavation and demolition of a section of LAA1, formwork and concrete placement for new LAA1 section to include slide gates and outlet to crossover pipe
- Connect LAA1 structure to 60-inch crossover pipe
- Backfill and close out

Equipment anticipated to be needed for project construction is summarized in Table 1.

Table 1. Typical Construction Equipment

Equipment	Approximate Number During Project Construction			
Boom truck crane	1			
Crane	1			
Pile boring equipment	1			
Roller compactor	1			
Hand compactor	1			
Excavator	1			
Backhoe	1			
Water Truck	1			
Auger	1			
Vibratory hammer	1			
Dump trucks	1-2			
Wheel loader	1			
Concrete trucks	1-2			
Concrete pump	1			
Generators	1-2			
Light plants	2-4			
Welding machine	1			
Weld truck with trailer	1			
Forklift	1			
Utility pickup trucks	4			
Air blowers	1-2			
Skid Steer	1			
Tractor (delivery trucks)	Up to 10 over construction period			

Construction is anticipated to take approximately 9 months. All construction work, including vehicle and equipment staging, will be conducted within the existing BLM ROWs. Excavated soils

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would be used as backfill; soil export offsite is not anticipated. Construction work hours would be limited to sunrise to sunset. Deliveries and exports of construction vehicles, materials, and equipment would occur from 6:00 a.m. to 6:00 p.m., Monday through Friday, 7:00 a.m. to 5:00 p.m. on Saturday.

Best Management Practices

The following best management practices (BMPs) and standard measures would be implemented during project construction:

- **BMP** Water Trucks. Water trucks would spray roadway travel surfaces on existing and temporary roads used for construction and soil stockpiles.
- BMP High Wind Events. Work activities would be stopped during high wind events.
- BMP Cultural Resources Awareness Training. All field supervisors and all construction workers shall participate in training on cultural resources awareness prior to the initiation of project construction on project sites that involve ground-disturbing activities. The training shall include a description of the types of cultural resources (including tribal cultural resources and human remains) that could inadvertently be encountered during ground-disturbing activities, the sensitivity of the resources, the legal basis for protection of the resources, and the penalties for unauthorized collection of or knowingly damaging the resources. The training shall address the proper procedures in the event of an inadvertent discovery of a cultural resource, including the immediate halting of work in the area of the discovery, notification of appropriate individuals of the discovery, the establishment of appropriate protective buffer zones around the discovery, and the continued avoidance of the protected area until the resource has been evaluated by qualified individuals and an appropriate treatment plan has been developed and implemented. These procedures shall be documented in a cultural resources monitoring plan (CRMP) that shall establish, in the event of inadvertent discovery of cultural resources, monitoring procedures (including potential Native American monitors), notification procedures, key staff, and preliminary treatment measures for potential discoveries. The CRMP shall be written to ensure compliance with appropriate state and federal laws. The training presentation and CRMP shall be available to additional supervisory or construction personnel who may join after project construction has begun.
- BMP Unanticipated Discoveries. In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the proposed project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, evaluates the significance of the find and determines whether or not additional study is warranted. Should it be required, temporary flagging may be installed around a resource to avoid any disturbances from construction equipment. Depending upon the significance of the find under CEQA (14 California Code of Regulations Section 15064.5(f); PRC Section 21082), the archaeologist may record the find to appropriate standards (thereby addressing any data potential) and allow work to continue. If the

archaeologist observes the discovery to be potentially significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery, may be warranted. Work in the area may resume once evaluation and treatment of the resource is completed or the resource is recovered and removed from the site.

- Standard Measure Unanticipated Human Remains. In the event that human remains are inadvertently encountered during ground disturbing activities, they would be treated consistent with state and local regulations including California Health and Safety Code Section 7050.5, California Public Resources Code Section 5097.98, and the California Code of Regulations Section 15064.5(e). In accordance with these regulations, if human remains are found, the County Coroner must be immediately notified of the discovery. No further excavation or disturbance of the project site or any nearby (no less than 100 feet) area reasonably suspected to overlie adjacent remains can occur until the County Coroner has determined if the remains are potentially human in origin. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she is required to notify the Native American Heritage Commission (NAHC) that shall then notify those persons believed to be the most likely descendant. The most likely descendant shall determine, in consultation with the property owner, the disposition of the human remains.
- BMP Biological Resources Worker Environmental Awareness Program. All field related project personnel, including LADWP employees, contractors, and subcontractors, shall be required to attend a worker environmental awareness program (WEAP) prior to construction. The WEAP shall be conducted prior to ground disturbance. WEAP training shall include a brief review of special-status species and other sensitive resources that could exist in the project area (including their life history and habitat requirements), the locations of sensitive biological resources, and their legal status and protection under the U.S. Endangered Species Act of 1973 and the California Endangered Species Act (Sections 2080-2080.5 of the California Fish and Game Code).
- BMP Nesting Bird Surveys. A nesting bird survey shall be conducted within three (3) days prior to the start of project construction if activities are proposed to begin during the nesting bird season (February 15 to August 30). If an active nest is found, the biological monitor shall establish an appropriate buffer around the nest. The prescribed buffers for common species are generally 300 feet but may be adjusted by the qualified biologist based on existing conditions around the nest, planned construction activities, tolerance of the species, and other pertinent factors. For example, buffers for common passerines, often found to be habituated to human activity, may be adjusted down to 25 50 feet depending on the disturbance tolerance of each specific species. No construction activity shall occur within the established buffer area. The monitor shall then observe the nesting bird to determine if construction activity is causing it stress. If the bird appears unduly stressed by construction activity, the monitor shall review the buffer area and construction activities shall be limited until any young have fledged.

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• BMPs – Stormwater Management. BMPs for the protection of stormwater quality would be implemented during project construction.

Housekeeping Measures

- · Conduct an inventory of products used or expected to be used
- Cover and/or berm loose stockpiled construction materials
- · Store chemicals in watertight containers

Employee Training

- Brief staff on the importance of preventing stormwater pollution
- · Have staff review SWPPP
- · Conduct refresher training during the wet season
- · Document training

Erosion and Sediment Controls

- Provide effective cover for inactive areas cover, berm, or direct runoff to suitable basins
- · Establish and maintain effective perimeter control
- Stabilize construction entrances and exits to control sediment inspect ingress and egress points daily, and maintain as necessary
- Control dust during earthwork
- Place sandbags or other barriers to direct stormwater flow to suitable basins

Spill Prevention and Control

- · Inspect construction equipment for leaking
- Use drip pans until equipment can be repaired
- Cleanup spills Immediately remove adsorbent promptly
- · Notify the proper entities in the event of a spill

Concrete Truck Washing Waste

- Provide containment for capture of wash water
- Maintain containment area

Hazardous Waters Management and Disposal

- Store hazardous wastes in covered, labeled containers with secondary containment for liquid hazardous wastes
- · Store wastes separately to promote recycling and to prevent undesirable chemical reactions

Materials Handling and Storage

- · Establish a designated area for hazardous materials
- Berm, cover, and/or contain the storage area as necessary to prevent materials from leaking or spilling
- · Store the minimum volume of hazardous materials necessary for the work

Vehicle and Equipment Maintenance, Repair, and Storage

- Inspect vehicles and equipment regularly
- · Conduct maintenance as necessary
- Designate areas for storage where fluids can be captured and disposed of properly

Scheduling

- Avoid work during storm events
- Stabilize work areas prior to predicted storm events

1.3.2 Operations and Maintenance

Operation and maintenance (O&M) activities for the LAA Crossover project are not anticipated to require substantial ground disturbance. O&M activities would include:

Butterfly Valves (Pratt)

Maintenance (Annually): Typical maintenance would be shaft packing replacement and actuator adjustment.

- Cycle the valve verify operation
- Check for leakage fully close the valve
- Check flange connections for leakage
- Check for shaft leakage check for leakage and replace valve packing
- Remove scale that interfere with disc travel. Inspect seat wear.
- No lubrication required

Water Control Gates (Fontaine Aquanox)

Inspection Frequency:

- Initial After 25 operation cycles /2 weeks after start-up
- Second 50 cycles after initial inspection / 6 months after start-up
- Subsequent Every 100 operation cycles / 6 months
- Intense/Extreme Conditions Inspect every 3 months

Gate Maintenance:

- Clean gate with clean water to remove deposits
- Verify guides and seals are in good condition

Stem Maintenance:

- Verify stem and lift nut thread conditions in order to detect excessive wear
- Thoroughly clean the stem thread using a plastic/stainless steel brush to prevent contamination of the stem
- Lubricate the stem threads with the proper grease (Lubriplate food grade, non-toxic)

1.4 APPLICABLE PLANS AND POLICIES

As depicted in Figure 3, the project is located on land managed by the BLM within ROW granted to the City of Los Angeles adjacent to the Aqueducts. Inyo County designates the land use of the parcel as SFL (State and Federal Lands). The zoning overlay is OS-40 (Open Space, 40-acre lot minimum). The Inyo County General Plan (2001) and subsequent amendments serve as the County's long range policy document to guide physical and economic growth and environmental protections.

1.5 PROJECT APPROVALS

Permits, approvals, and notifications to other agencies are anticipated to include:

- The project is located within LADWP's ROW with BLM, therefore no BLM approvals are required. Coordination between LADWP and BLM regarding the project is ongoing. LADWP will notify BLM of the specific project construction schedule once determined.
- If the work site exceeds 1 acre, construction would be completed in compliance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, NPDES NO. CAS000002). As applicable, a Storm Water Pollution Prevention Plan (SWPPP) incorporating BMPs for erosion control would be developed and implemented during project construction.
- As applicable, a Transportation Permit would be obtained for transportation of heavy construction equipment and/or materials which requires the use of oversized transport vehicles on State highways.
- As applicable, the owner of the portable diesel engine must obtain a California Air Resources Board Portable Equipment Registration Program (PERP) registration or a Great Basin Unified Air Pollution Control District (GBUAPCD) permit from the respective agencies for temporary use during project construction. The project would also comply with GBUAPCD Rule 401 which requires construction projects to incorporate fugitive dust reduction measures.
- Based on the depth of groundwater at the site, dewatering is not anticipated to be required. Therefore, permits related to water discharges are not anticipated.
- Significant impacts to special status species or other biological resources are not anticipated for the project (see Section 2.3.4). However, if special status species are observed prior to or during construction of the project, notifications to the California Department of Fish and Wildlife (CDFW) and/or United State Fish and Wildlife Service (USFWS) will be made as applicable.

Section 2 Environmental Analysis

2.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

check		es. However, mitigation		gnificant impacts as indicated by the been identified to reduce impacts on
	Aesthetics	Greenhouse Gas E	missions	Population and Housing
	Agricultural Resources	☐ Geology and Soils		☐ Public Services
	Air Quality	Hazards and Hazar	dous Materials	Recreation
\boxtimes	Biological Resources	☐ Hydrology and Wat	er Quality	Transportation
\boxtimes	Cultural Resources, Tribal Resources	Land Use and Plan	ning	☐ Utilities and Service Systems
	Energy	☐ Mineral Resources ☐ Noise		Wildfire
2.2 On the	AGENCY DETER			
OII III	e basis of this initial eval	uation.		
	I find that the project C DECLARATION will be pre		nificant effect on	the environment, and a NEGATIVE
		e revisions in the project	have been made	vironment, there will not be a significant by or agreed to by the applicant. A
	I find that the project MAY REPORT is required.	have a significant effect	on the environmer	nt, and an ENVIRONMENTAL IMPACT
	impact on the environment pursuant to applicable lega	t, but at least one effect of standards, and 2) has be attached sheets. An ENV	1) has been adequen en addressed by m RONMENTAL IMI	potentially significant unless mitigated" lately analyzed in an earlier document nitigation measures based on the earlier PACT REPORT is required, but it must
	significant effects (a) have to applicable standards, a	been analyzed adequately nd (b) have been avoided	in an earlier EIR o d or mitigated purs	e environment, because all potentially or NEGATIVE DECLARATION pursuant suant to that earlier EIR or NEGATIVE posed upon the project, nothing further
Signat	ure: Janestr		_ Title: <u>Ma</u> and	nager of Environmental Planning I Assessment
Printed	_{d Name:} Jane Hauptma	an)/18/2023

2.3 ENVIRONMENTAL CHECKLIST

2.3.1 Aesthetics

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect on a scenic vista?			\boxtimes	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				

Discussion: The project site is located in Rose Valley in a remote area adjacent to BLM wilderness. Views of the project site are presented in Figures 5 and 6.

a) and c) Less than Significant Impact. Construction activities for the project include excavation and earthwork required for installation of 173 feet of 60-inch diameter pipeline. Views of the project site during construction would include approximately 20 construction vehicles, pieces of equipment and construction worker vehicles. The level of construction activity would alter views in the immediate area of the crossover installation for approximately 9 months. Due to the small size of the construction zone and relatively short construction period, the impact of ground disturbance associated with project construction would be temporary and less than significant on the visual character of the project area.

The new crossover pipe would be added below grade and would have no visual impacts during operation. A new mechanical platform would be constructed atop the replacement segment of the LAA1 (Figure 7). At approximately 14 feet high and 9 feet wide, the mechanical platform would change the view of the immediate project site but would be relatively unobtrusive. The new platform would be compatible with the LAA1 because of its minimal design of plain geometric forms and modest size, scale, proportion, and massing. Installation of the aboveground portions of the project would alter views of the site but would not substantially degrade the existing visual character of the site. The operational impact on scenic vistas and visual quality would be less than significant.

b) Less than Significant Impact. Scenic roadways are designated by BLM, Inyo National Forest, Caltrans, and the Federal Highway Administration. U.S. 395 is an officially designated

State Scenic Highway from Independence to north of Tinemaha Reservoir (postmiles 76.5 to 96.9) (Caltrans 2018). U.S. 395 is eligible for designation in the portions north and south of that segment (Caltrans 2018). The project area is 1.4 miles west of U.S. 395 in the eligible, but not designated, portion of the roadway. There are no trees, major landform features, rock outcroppings, or historic buildings within the immediate project area and none would be disturbed by project implementation. Due to the distance to U.S. 395, construction and operation of the crossover pipeline and new mechanical platform would not substantially alter views from an eligible but not designated scenic roadway. Impacts to scenic resources within a state scenic highway would be less than significant.

d) Less Than Significant Impact. The proposed project does not include permanent installation of new sources of lighting. Construction activities would occur primarily in daylight hours; some limited use of lighting may be necessary in the early morning or evening hours. Use of portable lights during construction, if any, would be localized. Since the proposed lighting would be of limited duration and confined to the specific area of construction, impacts on light and glare that could affect day or nighttime views of the project area would be less than significant.



Figure 5. Overview of the Little Lake Crossover Project Area (LADWP 2021)



Figure 6. View of the Little Lake Crossover Project Site Between the Aqueduct Maintenance Roads (LADWP 2021)

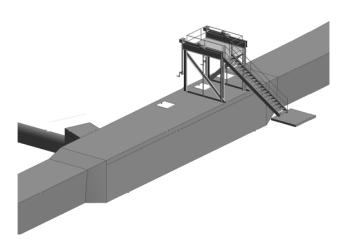


Figure 7. Little Lake Crossover Project 3D View of Platform (30% Design Drawing)

2.3.2 Agricultural and Forest Resources

	Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
W	ould 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?				
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?				
c)	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 Production (as defined by Government Code section 51104(g))?				
d)	Result in the loss of forest land or conversion of forest land to non-forest use?				\boxtimes
e)	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?				

Discussion:

- a) **No Impact.** The Farmland Mapping and Monitoring Program (FMMP) does not include Inyo County; therefore the proposed project would have no impact on conversion of FMMP designated Farmland (California Department of Conservation 2023a).
- b) **No Impact.** The project is located on land managed by the BLM within ROW granted to the City of Los Angeles. Existing zoning by Inyo County is OS-40 with a land use designation of SFL (Inyo County 2023a). Since Inyo County does not offer a Williamson Act program (California Department of Conservation 2019), the proposed project would have no impact on agricultural zoning or Williamson Act contracts.
- c) and d) **No Impact.** The project site is not zoned as forested land and the proposed project would not result in conversion of forest land to non-forest use. Public Resources Code Section 12220 (g) defines "Forest land" as land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. Since no trees exist on the project site, removal of native trees is not proposed. Therefore, the proposed project would have no impact on forest lands.

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e) **No Impact.** Irrigated farmland and ranches occur throughout Inyo County; however, none are present in the immediate vicinity of the project site. The project does not include new permanent fences, alter water distribution, or include haul routes across ranch properties. Therefore, there would be no impact on agricultural operations from construction and operation of the LAA Crossover Project.

2.3.3 Air Quality

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?				
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non- attainment under an applicable federal or state ambient ai quality standard?				
c) Expose sensitive receptors to substantial pollutant concentrations?				\boxtimes
d) Result in other emissions (such as those leading to odors) affecting a substantial number of people?				

Discussion:

The project is located within the Great Basin Valleys Air Basin (GBVAB), which includes Inyo, Mono, and Alpine Counties. GBVAB is under the jurisdiction of the GBUAPCD. The GBVAB is split into different planning areas, the project lies in the southwestern portion of the GBVAB known as the Coso Junction Plan Area. The Coso Junction Plan Area is an arid desert flanked by the Sierra Nevada Mountain Range to the west and the Coso Range to the east. Air pollution within the Coso Junction Plan Area is driven by windblown dust transported from Owens Lake as well as from geothermal power generation facilities, military operations, and volcanic cinder and pumice mining operations (GBUAPCD 2021).

Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards for outdoor concentrations. The federal and state standards have been set at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons such as children, pregnant women, and the elderly, from illness or discomfort. Criteria air pollutants include ozone (O₃), nitrogen dioxide (NO₂), carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter 2.5 microns or less in diameter (PM_{2.5}), particulate matter ten microns or less in diameter (PM₁₀), and lead (Pb). O₃ is not directly emitted but is a secondary pollutant formed from a chemical reaction between nitrous oxides (NO₃) and volatile organic compounds (VOC₅). Pursuant to the federal Clean Air Act, the GBUAPCD is responsible for reducing emissions of criteria air pollutants for which the GBVAB is considered in non-attainment. The Coso Junction Plan Area is in maintenance for PM₁₀ and has potential to violate the state hydrogen sulfide standards but has not yet done so because the standard does not apply to military operations within the area (GBUAPCD nd).

The Coso Junction PM₁₀ Planning Area Second 10-Year Maintenance Plan (Maintenance Plan) was prepared by the GBUAPCD in 2021 to demonstrate continued maintenance of the federal air quality standards to the United States Environmental Protection Agency (USEPA). The Maintenance Plan demonstrates that the area will continue to meet the PM₁₀ standard for the next decade (2020 to 2030) (GBUAPCD 2021).

- a) Less Than Significant Impact. This impact is determined based on whether the proposed project would conflict with or obstruct implementation of the applicable air quality plan and/or applicable portions of the State Implementation Plan, which would lead to increases in the frequency of severity of existing air quality violations. As a pipeline project, the proposed project would not induce unplanned growth, remove an existing obstacle to growth, or lead to permanent increases in vehicle miles travelled by existing motorists. Therefore, the proposed project would not conflict with or obstruct implementation of the applicable air quality plan and the impact is less than significant.
- b) Less Than Significant Impact. The project is in the Coso Junction Plan Area of the GBVAB, which is in a maintenance area for PM₁₀ and is in attainment for other air pollutants. During construction, the project would generate air emissions from off-road construction equipment and vehicle travel. As a pipeline, the project is not anticipated to result in any additional emissions during operation. Minor emissions from vehicles for inspections and potentially maintenance would be the same as existing conditions. Construction air emissions were calculated with the Sacramento Metropolitan Air Quality Management District (SMAQMD) Roadway Construction Model. The Roadway Construction Model is applicable for linear construction projects. Construction emissions are presented in Table 2.

Table 2. Estimated Project Construction Emissions

Emissions	PM10	PM2.5
Maximum Daily Emissions (lbs/day)	2.93	2.21
Annual Emissions (tons/year)	0.27	0.21

Note: Roadway Construction Model output files provided in Appendix A.

The GBUAPCD does not have any CEQA criteria air pollutant thresholds for either construction or operation. Therefore, emissions are provided for demonstrative purposes only. However, the emissions would be considered less than significant as the project would comply GBUAPCD Rule 401 which requires construction projects to incorporate fugitive dust reduction measures. As such, impacts are less than significant.

- c) **No Impact.** Sensitive receptors include schools, day-care facilities, nursing homes, and residences. No sensitive receptors are located near the project site or would be exposed to substantial pollutant concentrations. As such, no impacts would occur.
- d) **No Impact.** Project construction and operation would result in minor localized odors associated with fuel use for equipment and vehicles. These odors are common, not normally considered offensive, and would not be experienced by any residences since none are located on or immediately adjacent to the project site. Additionally, construction activities would be minimal and emissions would disperse rapidly from the remote project site.

Land uses typically considered to be associated with odors include wastewater treatment facilities, waste-disposal facilities, or agricultural operations. The project does not contain land uses typically associated with emitting objectionable odors. As such, no impacts would occur.

2.3.4 Biological Resources

	Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
W	ould 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 Wildlife or U.S. Fish and Wildlife Service?				
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 and Wildlife or U.S. Fish and Wildlife Service?				
c)	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				
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 wildlife nursery sites?				
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				
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?				

Discussion: Located in Inyo County east of the Sierra Nevada in the Mojave Desert, the project site is located between two maintained roads that are graded to access LAA1 and LAA2. The elevation of the project area is approximately 3,500 feet. Vegetation is dominated primarily by a mix of shrubs, including creosote bush (*Larrea tridentata*), white bursage scrub (*Ambrosia dumosa*), and blackbrush (*Coleogyne ramosissima*).

a) Less than Significant Impact with Mitigation Incorporated. Based on California Natural Diversity Data Base (CNDDB) listings for the project area and surrounding USGS quadrangle maps, and LADWP knowledge of the areas, sensitive plant and animal species and sensitive natural communities have the potential to occur on or near areas to be impacted by the project. LADWP Watershed Resources staff conducted a biological survey of the project area in April 2021. The survey reviewed the potential for special status species to be present at the project site. Special status species are defined as:

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- Species listed or proposed for listing as threatened or endangered, or are candidates for possible future listing as threatened or endangered, under the Federal Endangered Species Act or the California Endangered Species Act
- Species that meet the definitions of rare or endangered under CEQA Guidelines Section 15380
- Species covered under an adopted Natural Community Conservation Plan (NCCP) and/or Habitat Conservation Plan (HCP)
- Species designated by CDFW as Species of Special Concern
- Wildlife "fully protected" in California (California Fish and Game Code Sections 3511, 4700, and 5050)
- Species designated by BLM and U.S. Forest Service (USFS) as Sensitive species or a Species of Conservation Concern, respectively
- Wildlife protected by the Migratory Bird Treaty Act (MBTA)
- Plants ranked as a 1 or 2 by the California Native Plant Society (CNPS)
- Plants protected under the California Desert Native Plants Act (CDNPA)
- Plants protected under California Penal Code Section 384a

Literature Review. Prior to conducting the site visits, LADWP Watershed Resources Staff consulted the CDFW CNDDB, Rarefind and BIOS (CDFW 2021), CNPS Inventory of Rare and Endangered Vascular Plants of California (CNPS 2021), and LADWP's existing data resources to identify special-status species as well as natural communities that could occur in the project area and immediate vicinity.

Nine USGS quadrangle maps were searched (Cactus Peak, Coso Junction, Lamont Peak, Little Lake, Long Canyon, Ninemile Canyon, Pearsonville, Sacatar Canyon, and Volcano Peak) with an elevation between 3,000 ft and 4,000 ft. The CNPS Rare Plant Inventory was searched for these same quadrangle maps with the same elevation limits. The CNPS list is limited to Rare Plant ranks 1 and 2. The CNDDB species and CNPS lists are include in Appendix B.

Survey. LADWP Watershed Resources Staff surveyed the project area on April 1 and April 8, 2021 for special-status species. The site was also previously surveyed on April 20 and October 23, 2020. During these visits, native and non-native plant species, wildlife observations and/or applicable sign (e.g., track, nests, scat), habitat types, and community descriptions were recorded. Plant species were identified to the taxonomic level needed to determine rarity and listing status. A species list for the project area and immediate vicinity is included in Appendix B.

Results. Habitat assessment for special status species potentially present at the project site considered previously recorded occurrences (e.g., LADWP Watershed Resources Staff reports, monitoring data, local expert knowledge, databases), habitat preferences, geographic ranges,

habitat suitability (e.g., on-site vegetation and habitat quality, topography, elevation, soils, surrounding land uses), and any habitat changes (e.g., fire). Potential impacts to each species due to the type, duration, and timing of project activities were considered. Results are summarized in Appendix B.

The "potential for impact" categories are defined as follows:

- Unlikely: The project area and immediate vicinity do not contain habitat or is not within the known range for a particular species as confirmed by recent biological survey(s). Therefore, the proposed project would not have direct or indirect impacts to the species.
- Low: The project area and immediate vicinity contain suboptimal habitat for a particular species as confirmed by recent biological survey(s). There may be no recorded occurrences or older records of the species in the project area and immediate vicinity. There would likely be none to limited direct and/or indirect impacts to the species because habitat is such that it is unlikely to occur in the project area or immediate vicinity, and/or the proposed project would avoid sensitive time periods (e.g., nesting bird season, fish spawning season) for the species.
- Medium. The project area and immediate vicinity contain suitable habitat for a particular species as confirmed by recent biological survey(s). There may be no recorded occurrences or older records of the species in these areas, but habitat quality is such that the species could occur there. The proposed project may also occur during sensitive time periods for the species. As a result, project activities may directly and/or indirectly impact the species. The proposed project incorporates measures to avoid and/or minimize impacts to the species.
- High. The project area and immediate vicinity contain suitable habitat for a particular species as well as occurrences of the species. The presence of the species and/or suitable habitat may have also been confirmed during a recent biological survey or surveys. The proposed project may incorporate measures to avoid and/or minimize impacts to the species, but there could still be direct and/or indirect impacts to the species

For the majority of the species considered, implementation of the project would be unlikely to impact the species (Appendix B). Suitable habitat is present for two wildlife species considered to have medium potential to occur on the project site.

• Mojave Ground Squirrel. Mohave Ground Squirrel (MGS) is a small, grayish, diurnal squirrel that is currently listed under the California Endangered Species Act as a threatened species. MGS occur in the western half of the Mojave Desert. This species' historical range encompasses an area between Antelope Valley and Lucerne Valley in the south. However, MGS occurrences in the southern portion of its range are very rare. The northern limits of the range are near Owens Lake, in the north, and through China Lake Naval Air Weapons Station and Fort Irwin Military Base, in the east. The eastern limits extend to Barstow and

south along the Mojave River. The western limits loosely follow Highway 14 and the foothills of the southern Sierra Nevada escarpment (Best 1995). MGS inhabits flat to moderate terrain and is not generally found in steep contours (Best 1995, Leitner and Leitner 1998). Critical habitat centers on availability of food resources and soils with appropriate composition for burrow construction. The presence of shrubs that provide reliable forage during drought years may be critical for a population to persist in a particular area. Plant species such as spiny hopsage (*Grayia spinosa*), winterfat (*Krascheninnikovia lanata*), desert thorn (*Lycium* sp.) and saltbush (*Atriplex* sp.) are consumed extensively in the early spring before annuals are available, during the summer after annuals have dried, and during drought years (Leitner and Leitner 1998).

The proposed project site is on the western edge of MGS range. There were 11 occurrences of MGS documented within the nine-quadrangle CNDDB search area. Occurrences ranged from 2 miles southeast to 13 miles northeast of the project area. The dates of these occurrences ranged from 1978 to 2010. There are potentially suitable soils with appropriate composition for burrow construction in the project area for MGS, and key plant species imperative to early spring and summer survival such as *Krascheninnikovia lanata* and *Lycium cooperi* are present in the project area. Therefore, the habitat suitability is characterized as high to support MGS within the project area and in the immediate vicinity.

Smaller burrow complexes, most likely inhabited by mice or kangaroo rats, were observed in and around a 300-foot buffer of the project area. A couple of larger burrows were observed that could be inhabited by squirrel species such the more common Antelope Ground Squirrel.

A biological monitor shall be present on-site during project construction (BIO-1) to prevent significant impacts to MGS. Implementation of mitigation measures BIO-1, BIO-3, BIO-4, BIO-5, BIO-6, and BIO-7 would reduce potential impacts on MGS to less than significant levels.

Endangered Species Act and the California Endangered Species Act. Desert Tortoises occupy a variety of habitats from flats and slopes dominated by creosote bush scrub and white bursage at lower elevations to rocky slopes in blackbrush scrub and juniper woodland ecotones at higher elevations (Germano et al. 1994 as cited in USFWS 2010). Throughout most of the Mojave Desert, Desert Tortoises occur most commonly on gently sloping terrain with sandy-gravel soils and where there is sparse cover of low-growing shrubs, which allows establishment of herbaceous plants. Soils must be friable enough for digging of burrows, but firm enough so that burrows do not collapse. Typical habitat for the Desert Tortoise in the Mojave Desert has been characterized as creosote bush scrub below 5,500 feet, where precipitation ranges from 2 to 8 inches, the diversity of perennial plants is relatively high, and production of ephemerals is high (USFWS 2011).

Desert Tortoise is known to occur within the vicinity of the project area based on past biological surveys along the LAA1 (LADWP 2016). The CNDDB documents occurrences of Desert Tortoise at locations 8 to 11 miles north of the project based on observations

from 2006 and 2016. The habitat surrounding the project area contains suitable soils with appropriate composition for burrow construction. The plant community consists mainly of creosote bush and cattle saltbush (*Atriplex polycarpa*) which are both desirable shrubs for digging burrows to provide shade and cooler temperatures underground. Although cheatgrass (*Bromus tectorum*) and red brome (*Bromus madritensis*) have encroached into the area, there is an abundance of annual wildflowers in the spring, offering a variety of forage desirable for the Desert Tortoise. Due to suitable habitat present, the potential for Desert Tortoise to occur within the project area is high. The project area and 300-foot buffer was surveyed for Desert Tortoise and sign (i.e., burrows, scat, tracks, shell fragments, etc). No Desert Tortoise individuals or sign were observed. However, there is potential for Desert Tortoise to traverse through the project area. A biological monitor shall be present on-site during project construction (BIO-1) to prevent significant impacts to Desert Tortoise. Implementation of mitigation measures BIO-1, BIO-3, BIO-4, BIO-5, BIO-6, and BIO-7 would reduce potential impacts on Desert Tortoise to less than significant levels.

Suitable habitat is present for four sensitive plant species, although the potential for each of these species to be present on the site is considered low (Appendix B).

• *Phacelia nashiana* (Charlotte's phacelia). *Phacelia nashiana* has a California Rare Plant Rank of 1B.2; 1B rankings are also considered sensitive species by BLM. This species is endemic to California, where it is known only from 1,920 to 7,040 feet in elevation, the ecotone where the lower Sierra Nevada and Tehachapi Mountains transition into the Mojave Desert. It grows in sandy to rocky, granitic east-facing slopes in Joshua tree or pinyon-juniper woodland. It blooms from February to June (Walden et al. 2013).

There were five occurrences from the CNDDB quadrangle search. The closest location was 0.9 miles south of the project area located in Little Lake Canyon. The other occurrences were 5 to 10 miles south in other canyons and located on steep slopes with granitic sand or gravelly soils. The records ranged in year from 1987 to 2015.

The project area lacks the habitat features that would be suitable for *Phacelia nashiana* to grow, therefore, the potential for this species to be in the project area is low. No *Phacelia nashiana* was observed during the April 2021 surveys.

• *Mentzelia tridentata* (creamy blazing star). *Mentzelia tridentata* is an annual herb that is native and endemic to California with a California Rare Plant Rank of 1B.3. This species occurs between about 2,300 and 4,200 feet in creosote bush scrub and flowers between April and May (Brokaw et al. 2012).

There were three occurrences in the nine-quadrangle search. They ranged from 2 miles southeast and north-northeast to 8 miles east-southeast of the project area. Cresote bush scrub does occur in the vicinity of the project area, but no *Mentzelia tridentata* was observed.

• *Eremothera boothii ssp. boothii* (Booth's evening-primrose). *Eremothera boothii ssp. boothii* is an annual herb that is native to California and has a California Rare Plant Rank

of 2B.3. It occupies sandy flats and steep loose slopes in Joshua tree and pinyon-juniper woodland in between 3,000 and 8,000 feet in elevation. It blooms between June and August.

There was one occurrence in the nine-quadrangle search. The Jepson eFlora (2021) indicates that the closest occurrence to the project area was from 1931 about 8 miles north on a gravelly roadside. Suitable habitat may exist in and around the project area, but no occurrences of this species were observed.

• Penstemon fruticiformis var. amargosae (Amargosa beardtongue). Penstemon fruticiformis var. amargosae is a perennial herb that is native to California and has a California Rare Plant Rank of 1B.3. It occupies creosote bush scrub between 3,300 and 5,700 feet in elevation and blooms between May and June.

The Jepson eFlora (2021) indicates that the closest occurrence to the project area in the nine-quadrangle search was in the Cactus Peak quadrangle. The occurrence is about 10 miles northeast of the project area, but the information on the record is vague as to the exact location and date. The project area is surrounded by creosote bush scrub, and one *Penstemon sp.* was observed though it had been eaten by herbivores, which made identification difficult.

Potential Impacts to Rare Plants. Rare plants were not observed during surveys of the site in 2021 and the potential for impacts to rare plants is considered unlikely to low. However, 2020 and 2021 were below average water years which negatively impacted the germination of desert annual plant species. Additionally, the timing of the surveys in April 2021 could have limited detection of some species. Therefore, a rare plant survey shall be conducted prior to construction of the project (BIO-2) to verify the absence of these species. Additionally, a biological monitor shall be present on-site during project construction (BIO-1) to prevent potential significant impacts to rare plants. Implementation of mitigation measures BIO-1, BIO-2, BIO-5, BIO-6 and BIO-8 would reduce potential impacts on rare plants to less than significant levels.

- b) Less Than Significant Impact with Mitigation Incorporated. Per the CDFW California Natural Community List (2023), sensitive vegetation communities in the project area include white bursage scrub and black brush scrub. To reduce potential impacts on these communities, mitigation measure BIO-6 would be implemented to restrict construction work areas to the existing ROW and to reduce disturbance of shrubs and surface soils to the extent feasible. With implementation of mitigation measures BIO-1, BIO-2, BIO-5, BIO-6 and BIO-8 impacts on sensitive vegetation communities would be reduced to less than significant levels.
- c) **No Impact**. No riparian or wetland vegetation occurs on the project site and none would be impacted by construction or operation of the proposed project.
- d) Less than Significant Impact. Construction activity would likely reduce wildlife movement through the immediate area of the project site for the 9 months of construction. However, the project site is in a remote area adjacent to BLM wilderness lands and wildlife movement

around the construction zone would not be impeded. Once installed, wildlife movement at the project site would the same as existing conditions. Overall, impacts on wildlife movement would be temporary and less than significant.

e) Less Than Significant Impact with Mitigation Incorporated. No tree ordinances apply to the project area and Joshua Trees near the project area would be avoided during project construction (BIO-6).

The Inyo County General Plan Goals and Policies document (2001) includes two goals for biological resources issues: Maintain and enhance biological diversity and healthy ecosystems throughout the County, and provide a balanced approach to resource protection and recreation use of the natural environment (Goals BIO-1 and BIO-2). Once the crossover pipeline is installed, use of the project site by wildlife would be similar to existing conditions. The project would not impact or conflict with Inyo County goals for biological resources. Impacts on local policies or ordinances protecting biological resources would be less than significant.

f) **No Impact.** LADWP prepared a HCP for LADWP-owned lands in Inyo and Mono Counties (LADWP 2015) for the protection of seven species: Owens Pupfish, Owens Tui Chub, Owens/Long Valley Speckled Dace, bi-state population of Greater Sage-Grouse (*Centrocercus urophasinus*), Yellow-billed Cuckoo (*Coccyzus americanus*), Willow Flycatcher (*Empidonax traillii*), and Bell's Vireo. However, these species are not known for the project site and the site is located on federal lands within a ROW granted to the City of Los Angeles. Therefore the HCP is not applicable to the project.

There are no NCCPs within Inyo County (CDFW 2019). Additionally, the project site is not within a BLM-designated Area of Critical Environmental Concern (ACEC) (BLM 2018). Addition of the crossover pipeline within the existing utility ROW would therefore have no impact on conservation planning.

Mitigation Measures

In addition to BMPs for worker awareness training and nesting bird surveys (see Section 1.3.1), the following mitigation measures shall be implemented to reduce impacts on biological resources to less than significant levels:

BIO-1 Construction Monitoring for Biological Resources. A biological monitor shall be onsite for the duration of project construction. The biological monitor shall be familiar with the wildlife species and other sensitive biological resources known to occur in the general project area and be qualified to recognize potential construction effects on these resources. The monitor shall coordinate with the construction foreman or supervisor daily for any biological resource issues that may arise. The biological monitor shall conduct a preconstruction clearance survey prior to ground disturbing activities and ensure that protective measures are adhered to. They shall also have the authority to immediately stop any activity that is not in compliance with the biological resources mitigation measures.

BIO-2 Survey for Rare Plants. Prior to ground disturbance or vegetation clearing within the proposed project site, a qualified biologist shall conduct preconstruction rare plant clearance surveys (no more than seven (7) days prior to site disturbing activities) where suitable habitat is present and will be directly impacted by construction activities. Any rare plants found will be counted and flagged or fenced for avoidance, as feasible. If it cannot be avoided, then an appropriate relocation strategy shall be developed and coordinated with the CDFW and/or USFWS.

BIO-3 Special-Status Wildlife. Prior to ground disturbance or vegetation clearing within the proposed project site, a qualified biologist shall conduct preconstruction wildlife clearance surveys (no more than seven (7) days prior to site disturbing activities) where suitable habitat is present and will be directly impacted by construction activities.

If a special-status species enters the project area, (e.g., MGS, Desert Tortoise, etc.) work shall cease and the animal will be allowed to safely leave the site. A Watershed Resources Specialist supervisor will be notified immediately and work shall recommence upon approval. If a potential squirrel burrow is found within the ground disturbance area and cannot be avoided, the biological monitor shall carefully dig the squirrel burrow out by hand, allowing any potential occupant to escape unharmed. Where active relocation is required, special status wildlife shall be captured by a qualified biologist with proper handling permits. The qualified biologist shall prepare a species-specific list (or plan) of proper handling and relocation protocols. The list (or plan) of protocols shall be implemented during construction.

CDFW shall be notified and consulted regarding the presence of any special-status wildlife species found on site during surveys prior to or during ground-disturbing construction activities. If a federally-endangered species is found prior to or during ground disturbance of the site, the USFWS shall also be notified.

- BIO-4 Protective Measures for Open Pits and/or Trenches. Temporary construction fencing shall be setup around open trenches left overnight, as relevant. A ramp shall be placed inside or the sides sloped of any open trench to allow entrapped wildlife to escape. The biological monitor shall check trenches prior to backfilling.
- **BIO-5 Equipment and Material Staging.** Spoil sites, project building material, and/or construction equipment shall be placed in previously disturbed areas lacking native vegetation or where habitat quality is poor. Storage shall not occur in drainages.
- **BIO-6 Minimize Construction-Related Impacts.** Project design shall minimize temporary construction work areas to stay within the right-of-way and minimize the impacts to native vegetation and habitat. To the extent possible, disturbance of shrubs and surface soils due to stockpiling will be minimized. Construction personnel and contractors shall be responsible for working around all shrubs within the construction zone to the extent feasible. Joshua trees and a suitable buffer area established by the biological monitor shall be avoided during project construction.

BIO-7 Personnel Guidelines and Traffic Controls. The following precautionary measures shall be implemented during construction to protect wildlife resources:

- During construction all trash and food-related waste shall be placed in containers that can be securely covered or contained in vehicles, and removed daily from the site to prevent the attraction of wildlife and Common Ravens (*Corvus corax*) to the project area.
- All project generated debris, materials and rubbish shall be disposed of offsite in a legal manner.
- Construction personnel shall not feed wildlife.
- Vehicular traffic shall be confined to approved routes of travel to and from the project site, and cross-country vehicle and equipment use outside designated work areas shall be prohibited.
- The speed limit when traveling on dirt access routes shall not exceed 20 miles per hour. Workers shall be trained to comply with the speed limit, and enforcement provisions shall apply.

BIO-8 Weed Management and Control. Containment measures shall be implemented to prevent the introduction and spread of weed species in the project area. These measures include limiting disturbance areas during construction to the minimum required to perform work; limiting ingress and egress to defined routes; ensuring vehicles are inspected for plant debris and washed prior to first entering the project area; and closely monitoring the types of materials brought on site to minimize the potential for weed introduction and/or translocation to another site.

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2.3.5 Cultural Resources

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?				
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?				
c) Disturb any human remains, including those interred outside of formal cemeteries?				

Discussion: A cultural resources assessment for Little Lake Crossover project was conducted on behalf of LADWP by AECOM in 2021. The results of the investigation are generally summarized with limited information below. To protect archaeological resources present in the project vicinity, the cultural resources report is on file with LADWP but is not appended to the Initial Study. The confidentiality of records and information pertaining to the location, character, or ownership of archaeological sites and historic properties will be maintained consistent with National Historic Preservation Act (NHPA) Section 304, Archeological Resources Protection Act (ARPA) Section 9, and California Government Code 6254.10, as applicable.

A Historical Resources Technical Report (HRTR) was prepared on behalf of LADWP by Stantec in 2023 (Appendix C). The HRTR identifies and documents potential historical resources on the project site, evaluates the resources for inclusion in the National Register of Historic Places (NRHP) and California Register of Historical Resources (CRHR), and assesses the Project's potential to result in a substantial adverse change to the significance of an historical resource pursuant to Title 14 California Code of Regulations (CCR) §15064.5.

Ethnographic Overview. The project areas are situated within the southwest portion of the Western Shoshone traditional territory. The region ascribed to the Western Shoshone, also referred to as the Panamint and Koso Shoshone, is expansive and extends from the base of the eastern Sierra Nevada foothills in the west, eastward across Nevada, and into southern Idaho and northwest Utah (Thomas et al. 1986). While the project location is clearly located within the Little Lake and Koso district described by Steward (1938), it is clear that the area was an interface zone with a wide range of interaction occurring between the Tubatulable, Kawaiisu, and Owens Valley Paiute, ranging from cooperative hunting to intermarriage (Steward 1933, 1938).

The Western Shoshone, who refer to themselves as Newe, are a diverse community, historically evidenced by Steward (1937, 1938) whose work with Shoshone informants identified up to 48 regional subgroups. Western Shoshone settlements near the project areas were encompassed within the Little Lake and Koso (Coso) Mountains district. This district, referred to as Kuhwiji, encompassed 1,000 square miles surrounding the Coso Mountains (Steward 1938:81). Steward (1938:81) documented four main villages in the district, the nearest village was Pagundunzi, or Pagunda which means lake, located at Little Lake. The village was estimated to have 50 to 60 inhabitants in 1870, making it one of the largest settlements in the region.

Western Shoshone subsistence practices within the district of Kuhwiji were directly related to settlement patterns, centered around reliable plant resources and supplemented by a wide variety fauna available at the different environments present in their territory.

Historic Overview. The historic record of the eastern Sierra Nevada begins at the turn of the nineteenth century with early explorers and settlers in the region. From the mid to late 1800s, Euro-American incursions were more frequent, fueled by growing mining and railroad interests. During the early twentieth century, construction of the LAA1 brought another influx of labor and industry to the region. Construction of the LAA1 began in 1907 and was completed in 1913. The system originally extended approximately 233 miles with 4 storage reservoirs, 164 tunnels totaling 52 miles, 24 miles of open, unlined channel, 37 miles of concrete-lined channel, 12 miles of steel and concrete pipeline, and 98 miles of covered conduit (Nilsson and Bevill 2017). The need for additional infrastructure downstream from Mono Basin incited construction of the LAA2 between 1965 and 1970. The LAA2 extends roughly parallel with the LAA1 for 137 miles between the Haiwee Reservoir and the Van Norman Reservoir. It comprises 64 miles of concrete conduit, 69 miles of steel pressure pipes, and 4 miles of other facilities (Nilsson and Bevill, 2017).

Records Searches. In 2001-2002 AECOM legacy firm URS conducted a records search from the Eastern Information Center (EIC) housed at the University of California, Riverside in connection with an archaeological study of the Los Angeles Aqueduct. That records search included the APE and a 0.5-mile buffer for the Little Lake Crossover project. No previous investigations were identified within the records search area.

Additional archival research was conducted in 2021 and included review of:

- EIC provided site records and report data, historic site and property inventories, and historic maps
- National Register of Historic Places (NRHP)
- California Register of Historical Resources (CRHR)
- California State Built Environment Resource Directory (BERD)
- California Historical Landmarks and Points of Interest
- Caltrans Historic Highway Bridge Inventory (for both local and state agency bridges)
- City of Los Angeles Historic-Cultural Monuments (LAHCMs)
- Supplemental resource information provided by the BLM District Archaeologist (D. Storm)

The records search revealed that one recorded resource, the First Los Angeles Aqueduct (CA-INY-4591H), was previously identified as eligible for the NRHP. No other historic or precontact cultural resources are recorded within the project area.

a) Less than Significant Impact. For the HRTR, a Study Area was established to account for potential impacts to historical resources. The Study Area for the HRTR considered the project site plus a radius of 100 feet from the center of the project site.

The proposed project would alter segments of the NRHP-eligible LAA1, completed in 1913, and the LAA2, completed in 1970. The LAA2 is not currently listed in national, state, or local

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landmark or historic district programs and is not included as significant in any historic resource surveys of the area. Since this structure is more than 50 years old, it was evaluated for the NRHP and CRHR to determine if it qualifies as a historical resource. Inyo County does not have a local landmark designation program or maintain a local historic register; therefore, the LAA2 was not evaluated for local landmark programs.

The LAA2 is recommended eligible for the NRHP and CRHR at a local level of significance under Criterion A/1 for its association with the history of Los Angeles' water supply system (Appendix C, Department of Parks and Recreation [DPR] Form Set). It therefore is a historical resource for the purposes of CEQA, pursuant to Title 14 CCR §15064.5. The recommended status code is 3S and 3CS, which is defined as appearing individually eligible for the NRHP and CRHR through survey evaluation.

The threshold for determining significant impacts to historical resources in the CEQA Guidelines is whether the proposed project would cause a substantial adverse change, which is defined as demolition, destruction, relocation, or alteration of the resource or its immediate vicinity such that the historical resource is materially impaired. The project has the potential to directly impact the two historical resources on the project site. An 80-foot-long segment of the LAA1 and a 23-foot-long segment of the LAA2 would be demolished and replaced as part of the project. A new crossover pipe would be added below grade and a new mechanical platform would be constructed atop the replacement segment of the LAA1. The project, together with the North Haiwee Dam No. 2 Project, also has the potential to contribute to cumulative impacts to the two historical resources on the project site. However, the project would have no indirect impact on historical resources because, besides the Aqueduct segments within the project site, no other previously identified historical resources are in the Study Area.

The project would directly impact the two historical resources within the project site, but would not result in a substantial adverse change to the integrity of the identified historical resources to the degree that they would no longer be eligible CEQA—defined historical resources. The project would not impact the vast majority of the LAA1 or LAA2 as over 99.9 percent of the structures are outside the project area; therefore, the two historical resources would retain all aspects of integrity overall. The project, in conjunction with the North Haiwee Dam Seismic Improvement Project, would contribute to incremental impacts to the First Los Angeles Aqueduct, but the impact would be less than cumulatively considerable. Together, both projects only constitute 0.37 miles, or 0.0016 percent, of the approximately 233-mile-long LAA1. The remaining portion of the historical resource—approximately over 232.7 miles—would remain intact and its integrity of location, setting, design, materials, workmanship, feeling, and association would be preserved. For these reasons, the project would have a less than significant impact on historical resources.

b) Less than Significant Impact. An intensive pedestrian survey for archaeological resources was conducted in the project area on April 14, 2021, by Marc Beherec, Ph.D., RPA, and Allison Hill, M.A., RPA. Dr. Beherec and Ms. Hill both meet the Secretary of the Interior's Professional Qualifications Standards for Archaeology. Surface visibility ranged from approximately 65 percent to 100 percent. Much of the ground surface was visible with some patches partially obscured by vegetation. Soil was a low compaction silty sand with numerous

granitic cobbles and boulders in portions of the APE that were outside of the dirt roads where LAA1 and LAA2 are located below ground surface. Vegetation observed included creosote, salt brush, rabbit brush, and chia, with Joshua trees present in the surrounding area. The APE is on a gentle slope which exhibits evidence of mechanical modification (i.e., grading) from the construction of the Aqueduct systems.

No archaeological resources were observed during the survey, and based on the previous disturbance for construction and maintenance of the Aqueduct system, the potential to encounter significant resources is considered low. However, excavation and earthwork for the crossover pipeline installation has the potential to disturb previously unknown cultural resources. Implementation of BMPs as part of the project (see Section 1.3.1) would reduce impacts on cultural resources to less than significant levels.

c) Less than Significant Impact. No recorded cemeteries are known for the project area. In the unexpected event that human remains are discovered during project construction or operation, the County Coroner shall be contacted, the area of the find would be protected, and provisions of State CEQA Guidelines Section 15064.5 and Public Resources Code 5097 would be followed. With implementation of this standard procedure (see Section 1.3.1), project-related impacts on human remains and associated funerary objects potentially present in the project area would be less than significant.

2.3.6 Energy

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?				
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				

- a) Less Than Significant Impact. Construction would require fuels for heavy equipment, electric power and fuel for personal vehicles over approximately 9 months. Limited quantities of fuel would also be used for periodic inspections and potentially maintenance during project operation, as under existing conditions. However, once installed, the Little Lake Crossover project would allow water to flow through the Haiwee Power Plant to generate approximately 3,150 megawatt hours of additional power per year. Therefore, energy use for the project construction would not be wasteful. Impacts on energy use would be less than significant.
- b) **No Impact.** The Inyo County General Plan Conservation and Open Space Element includes a section on Energy Efficiency (Inyo County 2001). The County has established the following energy policies:
 - Policy EE-1.1 The County will work to reduce the overall energy usage at its facilities by 10% by 2016 (or 3.34% per year), as long as the reductions will also result in cost savings to the County.
 - Policy EE-1.2 The County will continue to evaluate energy use and reduction targets as a way to promote energy efficiency throughout the county and as a means to reduce operating costs.
 - Policy EE-1.3 The County will continue to implement the action items identified in the 2012 Energy Action Plan to meet its overall energy reduction goals as long as those actions will result in savings to the County from reduced energy usage.
 - Policy EE-1.4 The County will consider adopting incentive programs for homeowners who exceed the State's requirements for new construction, remodels, and additions.
 - Policy EE-1.5 The County will consider adopting recognition programs for homeowners who exceed the State's requirements for new construction, remodels, and additions.
 - Policy EE-1.6 The County will consider adopting incentive programs for business owners and all other non-residential building owners who exceed the State's requirements for new construction, remodels, and additions.

• Policy EE-1.7 The County will consider adopting recognition programs for business owners and all other non-residential building owners who exceed the State's requirements for new construction, remodels, and additions.

The County also prepared a Renewable Energy General Plan Amendment (2015) that provides siting guidance for community- and utility-scale solar facilities. Focused on solar photovoltaic renewable energy, the Plan is not relevant to or in conflict with the Little Lake Crossover project.

Construction and operation of the project would require the consumption of fossil fuels and electric power. Overall, the project would not use energy in a wasteful manner and would be consistent with Inyo County policies for energy efficiency. The project would have no impact on energy planning.

2.3.7 Geology and Soils

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
 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? Refer to Division of Mines and Geology Special Publication 42.				
ii) Strong seismic ground shaking?			\boxtimes	
iii) Seismic-related ground failure, including liquefaction?			\boxtimes	
iv) Landslides?			\boxtimes	
b) Result in substantial soil erosion or the loss of topsoil?			\boxtimes	
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?				
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?				
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?				
f) Directly or indirection destroy a unique paleontological resource or site or unique geologic feature?		\boxtimes		

Discussion: The Project area is located in the far southwestern edge of the Basin and Range geomorphic province (California Geologic Survey 2002). This province has been undergoing west-northwest directed extension since its initiation approximately 16 to 19 million years ago (Harden 2004). This extension created a vast terrain of structurally complex basins infilled with thick stacks of alluvial sediments eroded from the surrounding mountain ranges with superposed lacustrine and fluvial deposits (Parsons 2006). The Basin and Range province is dominated by mountains, valleys, and normal faults that trend north-south or northwest-southeast. It is characterized by high geographic relief, with steep mountain ranges separated by deep valleys, such as Death Valley, Owens Valley, Saline Valley, and Rose Valley, where the project area resides. These valleys are characterized by primarily right-lateral strike slip faults that trend northwest.

Locally, the project is in the southern end of Rose Valley, a roughly north-south trending valley that feeds into Owens Valley in the north and is bound by the Sierra Nevada Mountains to the west and the Coso Range to the east and south. Rose Valley is typical of the basins in the Basin and

Range province, with a thick stack of alluvial sediments collecting on the valley floor. The valley has been volcanically active throughout the Quaternary, with volcanoes of the Coso Range east of the valley active up to the late Pleistocene (Yang et al. 2011).

Stratigraphy of the project is characterized as an alluvial fan complex sourced from the southern Sierra Nevada. Surficial materials in the complex consist of older alluvial fan deposits (Qof) dissected by younger alluvial deposits (Qa) (Dibblee and Minch 2008). Although Dibblee and Minch (2008) indicate the site is underlain by younger alluvial deposits, an earlier geologic map by Whitmarsh (1997) suggests the site is underlain by older alluvial deposits. Based on a geotechnical engineering investigation conducted for the project (LADWP 2022), the site is more likely underlain by younger alluvial fan deposits based on soils encountered during the field investigation in September 2021. According to Dibblee and Minch (2008), the younger alluvial deposits generally consist of loose sand, silt, and gravel associated with ephemeral stream channels that dissect the older alluvial fan deposits. The older alluvial fan deposits consist of boulders, gravels, sands, and breccia, highly cemented with calcified tuffaceous cement.

a)-i) and a)-ii) Less Than Significant Impact. The project area is located within a seismically active region known for active faults and historic seismicity. The project area is not mapped within a currently designated State of California Earthquake Fault Zone (formerly Alquist-Priolo Special Studies Zones) for surface fault rupture. However, the site is located on the Little Lake USGS quadrangle map which includes a designated Earthquake Fault Zone south of the project site (California Department of Conservation 1990). No known active faults cross the proposed Project site. The nearest fault segments to the project are associated with the Sierra Nevada fault zone, with the closest segment located approximately 0.18 miles east-northeast of the project site (USGS 2008). Additionally, the Fault Activity Map of California suggests that the site is located between two fault splays likely associated with the Sierra Nevada Fault Zone (Jennings and Bryant 2010a and 2010b); however, the most recent activity is characterized as Late Quaternary (last 700,000 years). Due to the scale of this map, the fault locations are not considered as reliable as the other local geologic maps.

Based on the geotechnical investigation completed for the project (LADWP 2022), the potential for damage from surface fault rupture is considered low. Additionally, design of the pipeline will incorporate seismic design requirements per the American Society of Civil Engineers. Since habitable structures would not be built as part of the proposed project, people would not be exposed to adverse effects involving seismic ground shaking. Damage to the project pipeline or associated facilities would be repaired as necessary. Overall, impacts related to seismic hazards would be less than significant.

a)-iii) Less Than Significant Impact. The project site is located on unsaturated alluvial fan deposits that are generally not considered susceptible to liquefaction. Per the geotechnical report completed for the project (LADWP 2022), the potential for damage from liquefaction is considered low. Additionally, the project does not expose people to potential substantial adverse effects involving strong seismic-related ground failure, including liquefaction. Impacts related to seismic-related ground failure would be less than significant.

- a)-iv) Less Than Significant Impact. Due to the relatively gentle sloping terrain and lack of adverse geologic structure or existing landslides, the potential for damage due to mass wasting or earthquake induced landslides is considered low (LADWP 2022). Additionally, since habitable structures would not be built as part of the proposed project, people would not be exposed to adverse effects involving landslides. Impacts related to landslides would be less than significant.
- b) Less Than Significant Impact. Excavation and earthwork required for crossover installation have the potential to temporarily increase soil erosion from disturbed areas. However, since construction methods would include BMPs identified in a SWPPP completed in compliance with the NPDES General Permit for Storm Water Discharges Associated with Construction Activity (General Permit), wind and water erosion of soils during construction would be minimized. Also, the project area has moderate relief reducing the likelihood of severe erosion. Impacts related to soil erosion and loss of topsoil would be less than significant.
- c) Less Than Significant Impact. The proposed project is located on unsaturated alluvial fan deposits that do not contain active groundwater production or oil production wells. No new production wells are proposed as part of the project. Therefore, the potential for ground subsidence from groundwater or oil withdrawal is considered low (LADWP 2022). Since no habitable structures would be built as part of the proposed project, impacts related to unstable soils would be less than significant.
- d) **No Impact.** Habitable structures would not be built as part of the proposed project. Therefore, there would be no project-related impacts from expansive soils.
- e) **No Impact.** Sanitation facilities are not present or proposed for the project site. Therefore, there would be no impact on soils related to wastewater disposal.
- f) Less than Significant Impact with Mitigation Incorporated. A paleontological resource assessment for the project consisted of an analysis of existing data including a museum records search from the Natural History Museum of Los Angeles County and a review of the most recent geologic mapping, relevant scientific literature, a geotechnical study of the project area, and the online collections of the University of California Museum of Paleontology (Stantec 2023, Appendix C). The closest documented fossil locality to the Project area is from the north end of Haiwee Reservoir, where a mammoth fossil was collected (LACM 2023). This research was used to assign paleontological potential rankings of the Society of Vertebrate Paleontology (2010) to the geologic units present in the project area, either at the surface or in the subsurface.

The results of this study indicate that the project area consists of artificial fill overlying young alluvium, which is assessed as having low-paleontological potential. These sediments are underlain by older alluvial sediments with high paleontological potential at depths of over 13 feet below ground surface. With designation of a qualified paleontologist meeting professional standards as defined by Murphey et al. (2019), and implementation of mitigation measures GEO-1, GEO-2 and GEO-3, impacts to paleontological resources would be less than significant.

Mitigation Measures

The following mitigation measures would reduce project-related impacts to paleontological resources to less than significant levels.

GEO-1 Paleontological Monitoring and Mitigation Plan. The Project Paleontologist shall develop and oversee the implementation of a Paleontological Monitoring and Mitigation Plan tailored to the project plans that provides for paleontological monitoring of earthwork and ground disturbing activities into undisturbed geologic units with high paleontological potential anticipated to be present at depths of greater than 13 feet, to be conducted by a paleontological monitor meeting industry standards (Murphey et al. 2019). Monitoring recommendations are as follows:

- Paleontological spot checks shall be conducted by a qualified paleontological monitor for initial ground disturbance over 13 feet in depth. Should older alluvial sediments with high paleontological potential be identified during spot checks, full time monitoring will be implemented.
- The Project Paleontologist may alter the frequency of monitoring or spot checks, based on subsurface conditions.

GEO-2 Worker's Environmental Awareness Program. The Project Paleontologist shall develop a Worker's Environmental Awareness Program training that communicates requirements and procedures for the inadvertent discovery of paleontological resources during construction, to be delivered by the paleontological monitor to the construction crew prior to the onset of ground disturbance.

GEO-3 Paleontological Discoveries. In the event that paleontological resources are encountered during construction activities, all work shall stop in the immediate vicinity of the finds while the paleontological monitor documents the find. The Project Paleontologist shall assess the find. Should the Project Paleontologist assess the find as significant, the find shall be collected and curated in an accredited repository along with all necessary associated data and curation fees.

2.3.8 Greenhouse Gas Emissions

Issues and Supporting	Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
 Generate greenhouse gas en indirectly, that may have a sig environment? 					
b) Conflict with an applicable pla adopted for the purpose of re greenhouse gases?					

Discussion:

Greenhouse gases (GHG) absorb and emit radiation within the thermal infrared range. When radiation from the sun reaches the Earth's surface, some of it is reflected back into the atmosphere as infrared radiation (heat). GHGs absorb this infrared radiation and trap the heat in the atmosphere. Over time, the amount of energy from the sun to the Earth's surface should be approximately equal to the amount of energy radiated back into space, leaving the temperature of the earth's surface roughly constant. GHGs, which are transparent to solar radiation, are effective in absorbing infrared radiation. This phenomenon is known as the greenhouse effect.

Among the prominent GHGs contributing to the greenhouse effect are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), nitrogen trifluoride (NF₃) and sulfur hexafluoride (SF₆). Each GHG differs in its ability to absorb heat in the atmosphere based on the lifetime, or persistence, of the gas molecule in the atmosphere. Often, estimates of GHG emissions are presented in carbon dioxide equivalents (CO₂e), which weigh each gas by its global warming potential (GWP).

GHG emissions are predominantly associated with activities related to energy production; changes in land use, such as deforestation and land clearing; industrial sources; agricultural activities; transportation; waste and wastewater generation; and commercial and residential land uses. Worldwide, energy production, including the burning of coal, natural gas, and oil for electricity and heat, is the largest single source of global GHG emissions.

LADWP has numerous programs for reducing GHG emissions, such as providing rebates to encourage use of energy efficient equipment, retrofitting City-owned facilities for increased energy efficiency, promoting the installation of solar and renewable power, and reducing GHG from vehicles by purchasing electric fleet vehicles.

a) Less Than Significant Impact. During construction, the project would generate short-term GHGs from off-road construction equipment and vehicle travel. As a pipeline, the project is not anticipated to result in additional GHG emissions during operation. Minor vehicle emissions during inspection and potentially maintenance would be the same as existing conditions. Construction emissions were calculated with the Sacramento Metropolitan Air

Quality Management District (SMAQMD) Roadway Construction Model. The Roadway Construction Model is applicable for linear construction projects.

Construction GHG emissions are presented in Table 3. Consistent with recommendations from the South Coast Air Quality Management District (SCAQMD), construction emissions were amortized over a 30-year period (SCAQMD 2008).

Table 3. Project GHG Emissions

Source	MT CO2e
Construction	1,309
Amortized Construction Emissions	43.63

The GBUAPCD does not have any CEQA significance thresholds for GHG emissions. However, construction would be short-term and emissions would cease once construction was complete. Therefore, impacts would be less than significant.

b) Less than Significant Impact. The California Air Resources Board (CARB) prepares scoping plans every five years pursuant to Assembly Bill (AB) 32. The purpose of the scoping plans are to generate a blueprint for the state to meet GHG reduction goals set forth in AB 32, Senate Bill (SB) 32, and AB 1279. The latest CARB Scoping Plan was released in 2022 with the goal of guiding the state to carbon neutrality by 2045 (CARB 2022). As a pipeline project that would not generate any long-term operational impacts, the Project would be consistent with the goals of the 2022 Scoping Plan.

At this time, there are no other applicable local plans or mandatory GHG policies that would apply to this project. Impacts related to GHG planning would therefore be less than significant.

2.3.9 Hazards and Hazardous Materials

	Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
W	ould the project:				
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				
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?				
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				
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?				
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?				
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				

Discussion:

a) and b) Less Than Significant Impact. Hazardous materials are not currently used or stored on the project site. Construction of the proposed project would require the routine transport, use, and storage of limited quantities of gasoline and diesel fuel, and potentially degreasers and solvents for construction vehicle maintenance. However, vehicle maintenance would occur at the existing LADWP maintenance facilities in Mojave (60 miles to the south) or the Sulfate Facility in Keeler (approximately 35 miles north of the project site). The Sulfate Facility includes a vehicle wash station, refueling station, and fuel tanks and areas for vehicle maintenance. The vehicle and equipment staging area for the project would be located on-site, within the existing BLM ROWs. Other chemical use is not anticipated.

Once installed, the Little Lake Crossover would require periodic inspection and potentially infrequent maintenance. Aside from fuels for vehicles and equipment, hazardous materials would not be used during operation.

LADWP has standard operating procedures for the routine transport, use, storage, handling, and disposal of hazardous materials related to the operation of construction equipment. LADWP also prepares an annual report on the transport, use, storage, handling, and disposal of hazardous materials. Therefore, with adherence to the standard operations procedures for hazardous materials use, impacts related to release or accidental exposure to humans or the environment would be less than significant.

- c) **No Impact.** There are no schools within ½ mile of the Little Lake Crossover. The closest school is located in Inyokern (Inyokern Elementary School) over 20 miles south of the project site. Additionally, hazardous materials use would be limited to fuels for construction vehicles. These materials would be properly handled (as described above). Since none are present, the project would have no impact on schools within ½ mile of the project site.
- d) **No Impact.** Section 65962.5 of the California Government Code requires the California Environmental Protection Agency (CalEPA) to update a list of known hazardous materials sites, which is also called the "Cortese List." The sites on the Cortese List are designated by the State Water Resources Control Board (SWRCB), the Integrated Waste Management Board, and the Department of Toxic Substances Control (DTSC).

Based on a search of hazardous waste and substances sites listed in the DTSC "EnviroStor" database; a search of leaking underground storage tank (LUST) sites listed in the SWRCB "GeoTracker" database; and a search of solid waste disposal sites identified by the SWRCB with waste constituents above hazardous waste levels outside the waste management unit, there were no sites listed on or adjacent to the project site. Therefore, the project would have no impact related to hazardous waste sites.

- e) **No Impact.** Seven public access airports and six private airstrips are located throughout Inyo County (Inyo County 2001) and another 27 airports are located throughout Kern County. The Inyokern Airport is closest to the project site; approximately 20 miles south. However, the project does not propose new tall structures and the project area is not located sufficiently near either a private airstrip or public airport to pose a safety risk. Therefore, there would be no project-related impacts on airport safety.
- f) Less Than Significant Impact. U.S. 395 runs through the Owens Valley and serves most of Inyo County's residents, including the populations of Bishop, Big Pine, Independence, and Lone Pine. The highway runs north into Mono County and south into San Bernardino County and serves as the main evacuation route for Owens Valley communities (Inyo County 2017). Construction equipment and vehicles would access the project site via U.S. 395. However, it is anticipated that equipment would mobilize to the site once and then remain on-site until construction was completed. Project operation would not generate substantial vehicle traffic for periodic inspection and maintenance. The project site is not a designated emergency staging area. Overall, the approximately 20 construction vehicles and 10 delivery trucks travelling on U.S. 395 would have a less than significant impact on emergency access and evacuation plans.

g) Less Than Significant Impact. The project area is not typically subject to wildland fires and the project site has only limited vegetation. Permanent habitable structures do not exist and none are proposed. The project site is mapped in a Moderate fire hazard zone (Inyo County 2023b). During construction, standard operating procedures for welding and/or other construction activities with an increased fire risk would be implemented. During operation, the crossover would not increase fire risk over existing conditions. Therefore, the project would have a less than significant impact related to wildland fires.

2.3.10 Hydrology and Water Quality

Issues and Supporting I	nformation Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
 a) Violate any water quality stand requirements or otherwise sub or groundwater quality? 	•				
 b) Substantially deplete groundw substantially with groundwater may impede sustainable ground basin? 	recharge such the project				
c) Substantially alter the existing site or area, including through of a stream or river or through surfaces, in a manner which	n the alteration of the course on the addition of impervious				
i) Result in substantial erosio	n or siltation on- or offsite?			\boxtimes	
ii) Substantially increase the r runoff in a manner which w offsite?	ate or amount of surface ould result in flooding on- or				
 iii) Create or contribute to rund exceed the capacity of exis drainage systems or provid sources of polluted runoff; 	ting or planned stormwater e substantial additional				
iv) Impede or redirect flood flo	ws?			\boxtimes	
d) In flood hazard, tsunami, or se pollutants due to project inund					
e) Conflict with or obstruct impler control plan or sustainable groplan?					

Discussion:

a) Less than Significant Impact. Beneficial uses and water quality objectives are specified in the Water Quality Control Plan for the Lahontan Region (Basin Plan) prepared by the Lahontan Regional Water Quality Control Board (Regional Board 2005). Surface water features are not present at the project site. Relevant to the project site, beneficial uses are designated for Rose Valley groundwater (Basin 6-56) for municipal, agricultural, and industrial use, and freshwater replenishment. Specific water quality objectives are not prescribed for Rose Valley, but water quality objectives for bacteria, chemical constituents, radioactivity, and taste and odor apply to all groundwater basins in the Lahontan Region.

Water Quality Impacts During Construction. During project construction, disturbance to surface soils would result from excavation and earthwork for installation of the crossover pipeline. During construction, stormwater would be managed in accordance with BMPs identified in a SWPPP completed in compliance with the NPDES General Permit for Storm Water. Specific BMPs would be selected and implemented by the Construction Contractor.

Table 4 summarizes typical stormwater BMPs. With the required SWPPP implementation, impacts on water quality during project construction would be less than significant.

Based on the geotechnical study conducted for the project (LADWP 2022), shallow groundwater is considered unlikely beneath the project site. Therefore, dewatering and discharge of shallow groundwater is not anticipated to be relevant for the proposed project.

- b) Less than Significant Impact. Excavation and earthwork required to install the crossover pipeline would require the use of water trucks to control fugitive dust. Water trucks would be filled with LAA water and therefore originally Owens Valley surface or groundwater. Otherwise, construction and operation of the crossover pipeline would not require the use of groundwater. Impacts related to groundwater volumes would be less than significant.
- c) i, ii, iii **Less than Significant Impact.** Excavation and earthwork of new DCMs would result in minor localized changes to drainage patterns in the immediate vicinity of the construction area. Stormwater drainage infrastructure is not present on the project site. Once the crossover pipeline is installed, surface topography would be returned to existing conditions. Impacts on erosion, drainage patterns and stormwater would temporary, minor and less than significant.
 - iv) Less than Significant Impact. The project site is not mapped within a 100-year or 500-year flood zone (Inyo County 2017) and the potential for regional flooding is considered low (LADWP 2022). Additionally, no habitable structures are present or proposed as part of the project. No levees or dams are present on the project site and no off-site levees or dams would be modified as part of project implementation. The project would have a less than significant on flood flows.
- d) Less than Significant Impact. Due to the distance to the ocean, tsunami is not relevant for the proposed project. Due to the distance to major bodies of water, localized seiche is not relevant for the proposed project. Mudflows, as relevant, would not impact habitable structures since none are present. Impacts related to inundation would be less than significant.
- e) **No Impact**. The state of California has adopted the Sustainable Groundwater Management Act to mandate sustainable groundwater development. This legislation mandates avoidance of adverse groundwater conditions by defining what constitutes an adverse condition (a minimum threshold) and by requiring avoidance of the adverse condition by management action. The project would not include groundwater pumping and would have no impact on groundwater volumes and quality. The project would therefore have no adverse impacts on water resources planning.

2.3.11 Land Use and Planning

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?				\boxtimes
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				

Discussion: The project is located on land managed by the BLM within ROW granted to the City of Los Angeles adjacent to the Aqueducts. Inyo County designates the land use of the parcel as SFL. The zoning overlay is OS-40. The Inyo County General Plan (2001) and subsequent amendments serve as the County's long range policy document to guide physical and economic growth and environmental protections.

- a) **No Impact.** The closest community to the project site is Pearsonville, located approximately 9 miles south of the crossover site. No permanent habitable structures are located on or immediately adjacent to the project site, and none are planned as part of the proposed project. Construction for the crossover project would be confined to the existing ROW. Therefore, there would be no project-related impacts on established communities.
- b) Less than Significant Impact. The project site is located in Inyo County on federally-owned lands managed by BLM.

Bureau of Land Management. The crossover site is located within the 25-million-acre California Desert Conservation Area (CDCA). Congress enacted the Federal Land Policy and Management Act of 1976 (FLPMA) which directed BLM to inventory CDCA resources and to prepare a comprehensive land-use management plan for the area. Originally completed in 1980, the CDCA plan was reprinted in 1999. The project site is not within a BLM-designated ACEC (BLM 2018).

Installation of the crossover would be consistent with the purpose of the existing ROW for water transmission as part of Aqueduct operations. Addition of 173 feet of 60-inch diameter pipe would not conflict with BLM land use plans for the area. Installation and operation of the crossover pipeline would have a less than significant impact on federal land use planning.

Inyo County General Plan. The Land Use Element of the Inyo County General Plan (2001) includes Policy LU-5.6 State and Federal Lands Designation. This designation applies to those State- and Federally-owned parks, forests, recreation, and/or management areas that have adopted management plans. The Conservation/Open Space Element of the Inyo County General Plan (2001) includes Policy REC-1.2 Recreational Opportunities on Federal, State, and LADWP Lands: Encourage the continued management of existing recreational areas and open space, and appropriate expansion of new recreational opportunities on federal, state, and

LADWP lands. For safety, public access for recreation at the crossover location would be restricted during construction. However, once installed, access to the project areas would the same as existing conditions. The impact on Inyo County land use planning would be less than significant.

2.3.12 Mineral Resources

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				
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?				

Discussion: Mineral resources are naturally occurring materials in the earth that can be utilized for commercial purposes (Inyo County 2001). As mapped by the California Department of Conservation (2023b), mines near the project area include Red Hill Quarry (2 miles northeast of the project site) and a sand and gravel pit (Materials Site #179) located approximately 7 miles southeast of the site. The area of the project site has also been studied for the potential to yield commodities such as gold, copper, lead, and tungsten (USGS 1985).

Inyo County is the Lead Agency for the processing of surfacing mining reclamation plan applications on private lands; Inyo County's Road Department, City of Los Angeles, and California Department of Transportation borrow pits; and surface mining on federally administered lands. All surface mining operations that disturb greater than 1 acre or move more than 1,000 cubic yards must have an approved reclamation plan before the start of mining activity. Reclamation plans are required by SMARA to assure that:

- Adverse environmental effects are prevented or minimized and mined lands are reclaimed to a useable condition readily adaptable for alternate land uses.
- Production and conservation of minerals are encouraged, while considering recreation, watershed, wildlife, aesthetic, range and forage values.
- Residual hazards to public health and safety are eliminated.
- a) and b) **No Impact.** Installation of the crossover would not impact active mining operations since none are present in the immediate project area. Construction and operation of a water pipeline between the two existing aqueducts would not result in the loss of availability of mineral resource recover sites since this area is within a City of Los Angeles ROW and would not be subject to mining. The project would have no impacts on mineral availability or mining operations.

2.3.13 Noise

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				
b) Generation of excessive groundborne vibration or groundborne noise levels?				
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 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?				

Discussion: The Little Lake Crossover is located in a remote area of Rose Valley where the main source of noise is U.S. 395 located 1.4 miles east of the project site. The Inyo County General Plan Public Safety Element (2001) defines sensitive receptors as residential areas, hospitals, convalescent homes and extended care facilities, schools, libraries, daycare centers, and other similar land uses. Inyo County General Plan Policy NOI-1.7 is relevant to noise controls during construction:

Contractors will be required to implement noise-reducing mitigation measures during construction when residential uses or other sensitive receptors are located within 500 feet.

Implementation Measure 5.0: Construction activities within 500 feet of existing noise sensitive uses shall be limited to the hours of 7:00 a.m. to 7:00 p.m. Monday through Saturday. No construction shall occur on Sunday or federal holidays without a special permit from the County for unusual circumstances.

a) Less Than Significant Impact. Sensitive noise receptors are absent from the immediate project area. The closest structures to the project site are associated with the LADWP's Aqueduct and reservoir keepers house over 3,000 feet southeast of the site. The closest other residence is over 1.5 miles from the crossover site and on the opposite side of U.S. 395. The closest school is in InyoKern, over 20 miles south of the project area.

During installation of the crossover, noise would be generated from excavators, backhoes, augers, delivery trucks, water trucks, dump trucks, and other construction equipment at the site. Noise could be intermittently noticeable to recreational users of adjacent BLM wilderness areas. However, noise would attenuate within a short distance. For example, construction equipment emitting 90 dBA at 50 feet would attenuate to 64 dBA at 1,000 feet (Canter 1977). Additionally, construction activity would not occur during 10:00 p.m. to 6:00 a.m. when there is greater potential for noise disturbance. Relevant to Inyo County noise policy, no construction

would occur within 500 feet of sensitive receptors. Therefore, given the absence of sensitive noise receptors to the project site, the project would not cause noise levels to exceed established thresholds and noise impacts would be less than significant.

Noise generated during project operation would include vehicle noise related to periodic inspection and potentially maintenance, the same as under existing conditions. The noise would be minor, infrequent, and due to the distance to the nearest receptors, noise impacts from project operation would be less than significant.

- b) Less Than Significant Impact. Equipment used for project construction may create minor groundborne vibration or groundborne noise. Since the closest habitable buildings are over 3,000 feet away, impacts related to temporary groundborne vibration or noise would be less than significant.
- c) **No Impact.** Seven public access airports and six private airstrips are located throughout Inyo County (Inyo County 2001) and 27 more are located throughout nearby Kern County. The InyoKern Airport is the closest public access airport to the project site; it is located approximately 20 miles south of the site. Therefore, the project is not located sufficiently near either a private airstrip or public airport to expose people residing or working in the area to experience excessive noise levels. There would be no project-related impacts on noise near an airport/airstrip.

2.3.14 Population and Housing

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				
 b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? 				

Discussion:

- a) Less Than Significant Impact. Since the project does not include construction of homes or businesses, it would not directly impact population growth in the Little Lake area. However, construction of the project would require workers to be in the area for approximately 9 months. These workers may be LADWP staff or a mix of LADWP staff and contractors. Staffing for operations and maintenance would be similar to existing conditions. The limited number of workers (approximately 20) over the construction period would have a less than significant impact on population growth.
- b) **No Impact.** No habitable structures are located on or immediately adjacent to the project areas, and none are planned as part of the proposed project. Therefore, there would be no impacts on housing from implementation of the Little Lake Crossover project.

2.3.15 Public Services

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project 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 impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i) Fire protection?				\boxtimes
ii) Police protection?				\boxtimes
iii) Schools?				\boxtimes
iv) Parks?				\boxtimes
v) Other public facilities?				\boxtimes

Discussion:

a)-i – v) **No Impact.** Habitable structures are not present on the project site and none are proposed as part of the project. The limited number of construction workers required to implement the project would not generate substantial population growth or create the need for new or expanded public services. Installation of a connecting pipeline between the two aqueducts would not alter the existing low risk of fire. Therefore, there would be no project-related impacts on fire protection, police protection, schools, parks, or other public facilities.

2.3.16 Recreation

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				
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?				

Discussion:

- a) **No Impact.** Habitable structures are not present on the project site and none are proposed as part of the project. The number of construction workers required to implement the project would not generate substantial population growth or create the need for new or expanded parks. Therefore, the project would have no impact on neighborhood or regional parks or other recreation facilities.
- b) Less Than Significant Impact. The project site is within City of Los Angeles ROW on BLM administered lands immediately adjacent to the Sacatar Trail Wilderness. The Wilderness area includes valleys, canyons, and alluvial fans to steep hills that lead into granite peaks and ridgetops reaching elevations of more than 7,800 feet. Springs in the canyons support riparian habitats of cottonwoods, willows, and grasses. Construction of the Little Lake Crossover over approximately 9 months would limit public access in the immediate area of construction to ensure public and worker safety. However, public use of the Wilderness area would not be altered. Operation of the crossover pipeline would not impact public access to adjacent recreational facilities. The project would not generate population growth that would require the construction or expansion of recreational facilities. Overall, impacts on recreation would be less than significant.

2.3.17 Transportation and Traffic

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
 a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities. 				\boxtimes
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?				
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				
d) Result in inadequate emergency access?				

Discussion: The main north-south transportation route through Inyo County and the Owens Valley, U.S. 395 is the only major roadway in the immediate project area. The majority of U.S. 395 is a four-lane divided highway.

Haul trucks traveling on state routes and highways would comply with the State of California Vehicle Code. Haul trucks would be within the Caltrans legal load limit (i.e., less than 189,000 pounds).

- a) **No Impact**. The project does not include housing, employment, roadway improvements or alternative transportation measures. Therefore, there would be no project-related impacts on alternative transportation plans and policies.
- b) Less Than Significant Impact. CEQA Guidelines Section 15064.3 describes considerations for evaluating the transportation impacts of projects and states that vehicle miles traveled (the amount and distance of automobile travel attributable to a project) is generally the most appropriate measure of transportation impacts. Since the proposed project is neither a housing or commercial development project nor a transportation project that would permanently increase vehicle miles traveled in the project area, vehicle use for construction is considered.

During project mobilization, vehicles required for construction (excavators, backhoes, compactors, dump trucks, water trucks, etc.) would be transported to the site via U.S. 395. It is anticipated that individual vehicles and pieces of equipment would be transported to the site once, remain on-site for up to 9 months, and then be demobilized. Vehicle trips per day would also result from the approximately 20 construction workers that would travel to the project site per day. Additionally, approximately 10 haul trucks would bring construction materials to the site over the course of the construction period. Combined, these sources are estimated to result in fewer than 30 vehicle trips per day. Since 100 vehicle trips per day is the threshold for studying consistency with a congestion management program, the vehicle trips per day related to project construction would result in less than significant impacts on transportation.

- c) Less Than Significant Impact. The proposed project does not include construction or modification of roadways. The construction site is located in a remote area. As relevant, warning lights, signs, traffic cones, signals, flag persons and/or comparable measures would be implemented to maintain safe travel on the Aqueduct access roadway. Impacts related to traffic safety would be less than significant.
- d) Less Than Significant Impact. Project construction would temporarily increase the volume of trucks travelling on U.S. 395 but would not alter any access points. The impact of the addition of approximately 30 construction-related vehicle trips per day would be less than significant on emergency access.

2.3.18 Tribal Cultural Resources

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
 Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or 				
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				

Discussion: On March 28, 2022, a search of the Sacred Lands File (SLF) from the NAHC was requested. A response letter was received via email from the NAHC on May 26, 2022, stating that the results of the SLF search failed to indicate the presence of Native American cultural resources in the immediate project site; though they stated that negative results do not preclude the presence of Native American cultural resources within the project site. The NAHC also provided a list of seven Native American tribes who are traditionally or culturally affiliated with the geographic area of the project, and may have direct knowledge of Native American cultural resources in the project site.

Consultation with Native American organizations and individuals was initiated to satisfy the requirements of AB 52. On December 19, 2022, LADWP sent notification letters via certified mail and follow-up emails to the seven Native American contacts provided by the NAHC, to request information regarding local knowledge about cultural resources, traditional gathering areas, or sacred lands in or near the project site. As of October 2023, consultation with tribal representatives is ongoing.

a) i and ii) **Less than Significant Impact with Mitigation Incorporated.** Since archaeological resources are not known for the project site, project construction and operation would not be anticipated to impact Tribal Cultural Resources. However, cultural BMPs and standard procedures (see Section 1.3.2) and mitigation measures TCR-1 and TCR-2 shall be implemented to further protect unknown cultural resources. As mitigated, the project would have a less than significant impact on CRHR-listed or eligible resources, or on resources significant to a California Native American tribe.

Mitigation Measures

Implementation of the following mitigation measures would reduce impacts on Tribal cultural resources to less than significant levels.

TCR-1 Tribal Notification. In the event that an archaeological resource inadvertently discovered during project construction is determined to be potentially of Native American origin based on the initial assessment of the find by a qualified archaeologist pursuant to California Public Resources Code Section 21083.2(i), the Native American tribes that consulted on the proposed project pursuant to California Assembly Bill 52 shall be notified and be provided information about the find to allow for early input from the tribal representatives with regards to the potential significance and treatment of the resource.

If, as a result of the resource evaluation and tribal consultation process, the resource is considered to be a tribal cultural resource in accordance with California PRC Section 21074, determined to be eligible for inclusion in the California Register of Historic Resources or a local register of historical resources or determined to be significant by LADWP (the CEQA lead agency), the qualified archaeologist shall monitor all remaining ground-disturbing activities in the area of the resource, and a tribal monitor from a consulting Native American tribe shall be invited to monitor the ground-disturbing activities. The tribal monitor shall be ancestrally affiliated with the project area and qualified by their tribe to monitor tribal cultural resources.

The input of all consulting tribes shall be taken into account in the preparation of any required treatment plan for the resources prepared by the qualified archaeologist. Work in the area of the discovery may not resume until evaluation and treatment of the resource is completed and/or the resource is recovered and removed from the site. Construction activities may continue on other parts of the construction site while evaluation and treatment of the resource takes place.

TCR-2 Tribal Monitoring. A tribal monitor shall be invited to monitor project-related ground-disturbing activities that have a reasonable likelihood of encountering tribal cultural resources. The tribal monitor shall be ancestrally affiliated with the project area and qualified by their tribe to monitor tribal cultural resources. Before initiating ground-disturbing activities, the tribal monitor shall conduct a brief awareness training session for the benefit of all construction workers and supervisory personnel. The training, which could be held in conjunction with the project's initial on-site safety meeting, shall explain the importance of and legal basis for the protection of significant tribal cultural resources. Each worker shall be notified of the proper procedures to follow in the event that tribal cultural resources or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and immediately contacting the site supervisor and LADWP's Environmental Planning and Assessment Group.

2.3.19 Utilities and Service Systems

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?				
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?				
c) 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?				
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?				
e) Comply with federal, state, and local management and reduction statues and regulations related to solid waste?				

Discussion:

a) Less than Significant Impact with Mitigation Incorporated. Habitable structures are not present on the project sites and none are proposed as part of the project. The limited number of construction workers required to implement the project would not generate substantial population growth or create the need for new or expanded water or wastewater service facilities.

The project is the installation and operation of a new water pipeline. As noted in the Initial Study, project construction would have potentially significant impacts on biological, tribal, and paleontological resources. As described previously, mitigation measures have been defined to reduce impacts to less than significant levels.

- b) **No Impact**. The project is a crossover pipeline to connect the Aqueducts and increase operational flexibility. Since the project does not impact water demand, it would have no impact on water supplies.
- c) Less Than Significant Impact. Wastewater generated at portable toilets is treated by the Lone Pine Community Services District in compliance with the requirements of the Lahontan Regional Water Quality Control Board. The limited number of construction workers required to implement the project would not generate substantial population growth or create the need for new or expanded water or wastewater service facilities. Impacts on wastewater service would be less than significant.

d) and e) Less Than Significant Impact. Project construction would create limited volumes of construction debris requiring disposal. Waste generated by construction workers would be disposed at a permitted landfill in compliance with applicable regulations. The Construction Contractor would select the disposal location. However, the Lone Pine Landfill serves the area and has a remaining site life of over approximately 40 years (GBUAPCD 2008). Impacts related to solid waste disposal and solid waste regulations would be less than significant.

2.3.20 Wildfire

Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands as classified as very high fire hazard severity zones, would the project:				
 a) Substantially impair an emergency response plan or emergency evacuation plan? 				
b) Due to slope, prevailing winds, or other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				

Discussion: CalFire is required by state law to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. The Little Lake Crossover site is mapped as a Federal Responsibility Area and no fire hazard severity zone is designated (CalFire 2022).

- a) Less Than Significant Impact. U.S. 395 serves as the main evacuation route for Owens Valley communities (Inyo County 2017). Construction equipment and vehicles would access the project site via U.S. 395. However, it is anticipated that equipment would mobilize to the site once and then remain on-site until construction was completed. Project operation would not generate substantial vehicle traffic for periodic inspection and maintenance. The project site is not a designated emergency staging area. Overall, the approximately 20 construction vehicles and 10 delivery trucks travelling on U.S. 395 would have a less than significant impact on emergency access and evacuation plans.
- b) Less Than Significant Impact. Habitable structures are not present on or adjacent to the project site and none are planned as part of the project. The project would not substantially alter existing vegetation such that fire risk would be increased. During construction, standard operating procedures for welding and/or other construction activities with an increased fire risk would be implemented. During operation, the crossover would not increase fire risk over existing conditions. Therefore, the project would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire. Project-related impacts on wildfire risk would be less than significant.

- c) **No Impact**. The project includes installation of 173 feet of 60-inch water pipeline. No additional infrastructure such as roads, fuel breaks, emergency water sources, power lines or other utilities that could exacerbate fire risk would be required. The project would have no impact on fire risk from associated infrastructure.
- d) **No Impact**. Habitable structures are not present on the project site and none are proposed as part of the project. Landslide and post-fire slope instability are not hazards identified for the project area. Therefore, the project would not expose people or structures to significant post-fire risks.

2.3.21 Mandatory Findings of Significance

	Issues and Supporting Information Sources	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				
b)	Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals?				\boxtimes
c)	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, effects of other current projects, and the effects of probable future projects.)?				
d)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				

Discussion:

- a) Less than Significant Impact with Mitigation Incorporated. Installation of the proposed crossover pipeline has the potential to impact biological, tribal, and paleontological resources. However, with incorporation of mitigation measures BIO-1 to BIO-8, the proposed project would not substantially degrade biological resources and impacts would be less than significant. Cultural resources are not known for the project sites, however BMPs, standard measures, and mitigation measures TCR-1 and TCR-2 have been identified to protect resources in the unlikely event they are discovered during construction. With designation of a qualified paleontologist, and implementation of mitigation measures GEO-1, GEO-2 and GEO-3, impacts to paleontological resources would be less than significant. Therefore, the project would not eliminate important examples of the major periods of California history or prehistory.
- b) **No Impact**. The project goal is to increase flexibility of Aqueduct operations and maximize power generation at the Haiwee Power Plant. The project would be constructed over approximately 9 months. There are no short-term goals related to the project that would be disadvantageous to this long-term goal.
- c) Less than Significant Impact. Related projects on the Aqueduct system or construction projects in the immediate vicinity of the proposed project have not been identified. Operation of the proposed crossover pipeline and operation of the Haiwee Power Plant would be cumulatively beneficial for the generation of renewable energy.

d)	Less than Significant Impact. The project goal is enhanced flexibility of the Aqueduct system to ensure generation of renewable energy at the Haiwee Power Plant – a beneficial impact on human beings. Temporary, less than significant impacts on air quality and noise would occur during project construction.

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3.2 ACRONYMS AND ABBREVIATIONS

AB Assembly Bill

ACEC Area of Critical Environmental Concern
ARPA Archaeological Resources Protection Act

BACM Best Available Control Measure

BERD Built Environment Resource Directory

Bgs below ground surface

BLM (United States) Bureau of Land Management

BMP best management practice

Caltrans California Environmental Protection Agency
Caltrans California Department of Transportation

CARB California Air Resources Board
CCR California Code of Regulations

CDCA California Desert Conservation Area
CDF California Department of Forestry

CDFW California Department of Fish and Wildlife

CDNPA California Desert Native Plants Act
CEQA California Environmental Quality Act

CFR Code of Federal Regulation

cfs cubic feet per second

CH₄ methane

CNDDB California Natural Diversity Database

CNPS California Native Plant Society

CO carbon monoxide CO₂ carbon dioxide

CO₂e carbon dioxide equivalent

CRHR California Register of Historic Resources
CRMP Cultural Resources Monitoring Plan

DTSC Department of Toxic Substances Control

DWR (California) Department of Water Resources

EIC Eastern Information Center
EIR Environmental Impact Report

EPA (United States) Environmental Protection Agency

Farmland Prime Farmland, Unique Farmland, or Farmland of Statewide Importance

FEMA Federal Emergency Management Agency

FLMPA Federal Land Policy and Management Act of 1976

FMMP Farmland Mapping and Monitoring Program

FRP fiberglass reinforced plastic

GBUAPCD Great Basin Unified Air Pollution Control District

GBVAB Great Basin Valleys Air Basin

GHG greenhouse gas

GWP global warming potential HCP Habitat Conservation Plan

HFC hydrofluorocarbon

Hp Horsepower

HRTR Historical Resources Technical Report

IS Initial Study

LAA Los Angeles Aqueduct

LADWP (City of) Los Angeles Department of Water and Power

LAHCM Los Angeles Historic-Cultural Monument

lbs pounds

LUST leaking underground storage tank

MBTA Migratory Bird Treaty Act
MGS Mohave Ground Squirrel

MND Mitigated Negative Declaration

MOA Memorandum of Agreement

msl mean sea level

MW megawatt

NAAQS National Ambient Air Quality StandardsNAHC Native American Heritage CommissionNCCP Natural Community Conservation Plan

NF₃ nitrogen trifluoride

NOx nitrous oxides

NPDES National Pollutant Discharge Elimination System

NRHP National Register of Historic Places

 O_3 ozone

O&M Operations & Maintenance

Pb lead

PERP Portable Equipment Registration Program

PFC perflurocarbon
PM particulate matter

PM₁₀ particulate matter 10 microns or less in diameter PM_{2.5} particulate matter 2.5 microns or less in diameter

PRA Paleontological Resources Assessment

ROW right-of-way SB Senate Bill

SCAQMD South Coast Air Quality Management District

SF₆ sulfur hexafluoride

SFL State and Federal Lands
SIP State Implementation Plan

SLF Sacred Lands File

SMAQMD Sacramento Metropolitan Air Quality Management District

SMARA Surface Mining and Reclamation Act

SNA Significant Natural Areas

SO2 sulfur dioxide

SRA State Responsibility Area

SWPPP Storm Water Pollution Prevention Plan
SWRCB State Water Resources Control Board

TSP total suspended particulates

USEPA United States Environmental Protection Agency

USFS United States Forest Service

USFWS United States Fish and Wildlife Service

USGS United States Geological Survey

VOC volatile organic compound

WEAP worker environmental awareness program

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