
F.E. Weymouth Water Treatment Plant Improvements Program



Final Environmental Impact Report

State Clearinghouse No. 2013121074

Metropolitan Report No. 1471

The Metropolitan Water District of Southern California

700 North Alameda Street

Los Angeles, CA 90012



March 2015

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**The Metropolitan Water District of
Southern California**

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**F.E. Weymouth Water Treatment Plant
Improvements Program**

**Metropolitan Report No. 1471
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CHAPTER 1

Minor Clarifications to the Draft EIR

This chapter contains the revised pages of the Draft Environmental Impact Report (EIR). The Metropolitan Water District of Southern California (Metropolitan) has proposed minor changes to the proposed project since publication of the Draft EIR. Accordingly, the first section of this chapter contains revisions to the Draft EIR based on changes proposed by Metropolitan. The second section of this chapter presents revisions to the Draft EIR based on comments received during the 45-day public review period (October 21, 2014 to December 6, 2014).

The following corrections and changes are made to the Draft EIR, and are incorporated herein as part of the Final EIR. Revised language and new language is underlined. Deleted language is indicated by ~~strike through~~ text.

Revisions in this chapter do not change any of the conclusions presented in the Draft EIR.

1.1 Metropolitan Initiated Revisions

1. Since the circulation of the Draft EIR and in response to comment received during the comment period, Metropolitan has modified the proposed project to include solar panels that would be approximately seven feet in total height (panel plus the foundation), rather than the originally proposed design of six to nine feet tall panels as reference in the Draft EIR. This design change would reduce the likelihood of the solar panels being visible from outside of the plant due to the existing wall height and designated setbacks (see Figures 2 through 5). The panel height change applies to the entire Draft EIR.
2. Since the circulation of the Draft EIR, Metropolitan has determined that the proposed project footprint potentially would impact more than the three mature oak trees described in the project description (Section 3.3 Biological Resources). As a result, the text has been modified to include an additional two mature oak trees. The minor addition does not impact the analysis or conclusions made in the Draft EIR. Text changes were made to pages 3.3-5 and 3.3-6 as shown below:

Page 3.3-5- Biological Resources

Construction noise may disrupt foraging, roosting, and nesting activities for wildlife in the project vicinity. Vibration caused by some construction activities can also disturb wildlife in the vicinity of construction sites. However, the Weymouth Plant is a water treatment facility that contains no native habitat. The

facility includes areas that are currently landscaped to provide aesthetic value and graded areas that lack vegetation. The only habitat of value to special-status species would be the mature trees located within the water treatment facility. These trees are located mainly along the perimeter of the plant to provide screening of views from the outside. The construction of the proposed Solar Generation Project would require removal of up to five~~three~~ mature oak trees in the southwestern corner of the plant. However, it has been determined based on the field survey, literature review and the lack of suitable habitat, that special-status species have a low to no potential to occur on the proposed project site. The closest critical habitat to the Weymouth Plant is a coastal California gnatcatcher critical habitat, located approximately 0.9 mile southwest of the plant perimeter. This critical habitat area is separated from the Weymouth Plant by urban development that includes residential and commercial developments and city streets. In addition, a search of the USFWS species occurrence database determined that no special-status species have been recorded within a one-mile radius of the Weymouth Plant. Due to the lack of suitable habitat and the ongoing activity within the plant, implementation of the proposed project would not cause any adverse effects to special-status species. Therefore, construction related impacts are considered to be less than significant and no mitigation would be required.

Page 3.3-6 (top of page) -Biological Resources

There are several mature trees within the Weymouth Plant which have the potential to provide nesting habitat to birds covered under the MBTA. The construction of the proposed Solar Generation Project would require the removal of up to five~~three~~ mature trees that have the potential to provide nesting opportunities for birds. In addition there is suitable substrate for ground-nesting birds, covered under the MBTA, within the Weymouth Plant and could be disrupted by construction of the proposed project. Consequently, the loss or abandonment (“take”) of nests of common bird species as a result of construction-related activities is considered a potentially significant impact and would conflict with State and federal laws. However, consistent with the prescriptions against “take” under the MBTA, if any construction work is to be initiated within the nesting period for migratory birds, which is generally from February 15 through August 31, a preconstruction survey of active nests for migratory birds would be conducted. No potential impacts to nesting birds are anticipated during the construction of the proposed project due to the minimal amount of potential habitat present throughout the plant. Impacts would be less than significant.

Page 3.3-6 (bottom of page)-Biological Resources

Construction – All Projects

The only proposed project that would potentially conflict with local policies or ordinances protecting biological resources during construction would be the Solar Generation Project facility located at the southwestern corner of the plant (off of

Sedalia Avenue). The implementation of the proposed solar facility would require the removal of ~~up to five~~ three oak trees which would be considered significant trees under the City of La Verne's tree preservation ordinance. The solar facilities would be an integral source of energy for Metropolitan's Oxidation Retrofit Program facilities and other facilities within the Weymouth Plant. Construction of the proposed project, including the Solar Generation Project, at the Weymouth Plant are exempt from local building and zoning regulations pursuant to Sections 53091(d) and (e) of the California Government Code. Therefore, the proposed projects are exempt from the City of La Verne's tree preservation ordinance contained within the City of La Verne's zoning code, Chapter 18.78, Preservation, Protection, and Removal of Trees, also pursuant to Sections 53091(d) and (e) of the California Government Code.

3. Since the circulation of the Draft EIR, Metropolitan has determined that the Stormwater Management Improvements would also be needed in the northeastern portion of the plant to improve sediment and erosion control measures and control surface water runoff. In addition, the Los Angeles Regional Water Quality Control Board has rescinded the Weymouth Plant's Industrial General Stormwater Permit. Therefore, the Weymouth Plant will not be required to comply with this permit. The minor additions and deletions shown below do not impact the analysis or conclusions made in the Draft EIR. Text changes were made to pages 2-11, 3.7-11 and 3.7-14 and are provided below:

Page 2-11-Project Description

Stormwater Management Improvements

The Stormwater Management Improvements project would implement long term engineering improvements throughout the Weymouth Plant to enhance, control, and reduce potential pollutants in stormwater runoff. Metropolitan has not determined specifically what improvements would be implemented. The improvements could include, but are not limited to, erosion control measures such as landscaping, bio-swales or larger scale treatment facilities (e.g., detention basins, stormwater treatment plant) to filter sediments and treat pollutants on-site. These facilities would be constructed in the southern and northeastern portions of the Weymouth Plant. In addition, canopies would be installed over outdoor storage areas to prevent potential pollutants from being introduced into stormwater runoff. The improvements would be made in accordance with the applicable local stormwater ordinance requirements, such as the City of La Verne Municipal Code (Section 13.50 Stormwater and Urban Runoff Pollution Control) and the Los Angeles County Code Ordinance (Chapter 12 Environmental Protection).

Page 3.7-11-Hydrology and Water Quality

Statewide NPDES General Permit for Industrial Activities

~~The most current Industrial General Permit (Order No. 2001-0057-DWQ, General Permit No. CAS000001) was recently adopted in April 1, 2004; however it will not become effective until July 1, 2015. The General Permit applies to stormwater~~

~~associated with industrial operations, including sewage treatment systems. Under this permit, dischargers are required to eliminate unauthorized non-stormwater discharges, develop and implement a SWPPP, and perform monitoring and reporting activities.~~

City of La Verne Municipal Code

The City of La Verne Municipal Code, Chapter 13.50 Stormwater and Urban Runoff Pollution Control, requires that all industrial/commercial facilities implement BMPs to the extent practicable following the guidelines published in the California Storm Water Best Management Practices Handbook, Industrial/Commercial, by the Storm Water Quality Task Force. The proposed project is in compliance with the City's relevant stormwater and urban runoff regulations, to the extent feasible.

Page 3.7-14-Hydrology and Water Quality

Weymouth Improvements Project

A number of improvement and maintenance projects would be implemented throughout the plant as part of the proposed project. Many of these are upgrades and replacement of existing mechanical equipment and instrumentation within existing buildings that would not impact water quality during operation or maintenance activities. In addition, one component of the proposed project is a Stormwater Management Improvements project that would improve the stormwater management system throughout the plant. Metropolitan has not determined specifically what improvements would be implemented. They could include, but are not limited to, erosion control measures such as landscaping, bio-swales or potentially larger scale treatment facilities (e.g., detention basins, stormwater treatment plant) to filter sediments and treat pollutants on-site. These facilities would be constructed in the southern and northeastern portions of the Weymouth Plant. In addition, canopies would be installed over outdoor storage areas to prevent potential pollutants from being introduced into stormwater runoff. With implementation of the stormwater management system improvements throughout the plant, impacts to water quality are anticipated to improve over existing conditions. Therefore, impacts to water quality are considered less than significant.

4. Section 3.9 Transportation and Traffic, *Regulatory Framework* on page 3.9-5 has been modified to include a more updated version of the (SCAG) Regional Transportation Plan and Sustainable Communities Strategies and the reference document has been added to page 9-8, as follows:

Page 3.9-5-Transportation and Traffic

Local

Regional Transportation Plan

The Regional Transportation Plan (RTP) is a 25-year transportation plan that focuses on improving the balance between land use and transportation systems (both current and planned) throughout the Southern California region. The Southern California Association of Governments (SCAG) is required by federal law to create an RTP that determines the needs of the transportation system and prioritizes proposed transportation projects. The RTP is also necessary to obtain and allocate federal funding for regional transportation projects (SCAG 2008~~2012~~). SCAG emphasizes sustainability and integrated planning in the 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy. The vision encompasses three principles: mobility, economy, and sustainability. The RTP must be updated and federally approved every three years. Federal approval requires a positive demonstration that RTP projects will not generate travel emissions that exceed those assumed in the applicable Air Quality Management Plan.

Page 9-8-References (Transportation and Traffic)

Southern California Association of Governments (SCAG), 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy Towards a Sustainable Future, Adopted April 2012.

1.2 Revisions to Draft EIR in Response to Comments Received

The changes below were made to the Draft EIR in response to comments received during the 45-day public review period. These corrections and clarifications do not substantially alter the proposed project, change the Draft EIR's significance conclusions, or result in a conclusion that would result in substantially more adverse environmental impacts to the proposed project. The modifications to the Draft EIR below merely "clarifies or amplifies or makes insignificant modifications" in the Draft EIR, as permitted by *State CEQA Guidelines* Section 15088.5(b).

State CEQA Guidelines Section 15088.5 requires the lead agency to recirculate an EIR only when significant new information is added to the EIR after public notice is given of the availability of the Draft EIR for public review. New information added to an EIR is not significant unless the EIR has changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial, adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect that the project's proponents have declined to implement.

In summary, significant new information consists of: (1) disclosure of a new significant impact; (2) disclosure of a substantial increase in the severity of an environmental impact; (3) disclosure of a feasible project alternative or mitigation measure considerably different from the others previously analyzed that would clearly lessen environmental impacts of the project, but the project proponent declines to adopt it; and/or (4) the Draft EIR was so fundamentally and

basically inadequate and conclusory in nature that meaningful public review and comment were precluded (*State CEQA Guidelines* Section 15088.5[a]). Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications to an adequate EIR (*State CEQA Guidelines* Section 15088.5[b]).

The modifications below present information that clarifies the scope of the proposed project and the analysis of the proposed project's impacts, but do not fundamentally alter the overall significance conclusions presented in the Draft EIR circulated for public review. Additionally, the modifications present information and analysis in response to requests from commenters. This analysis, however, merely provides further details on the analysis already provided in the Draft EIR.

5. The following text has been added to Chapter 2 Project Description at the end of *Section 2-6 Construction Characteristics* on page 2-12 of the Draft EIR, to include additional BMPs to further assist in the reduction of NO_x for the proposed project.

During construction, best management practices (BMPs) in Metropolitan's standard specifications would be required to control erosion and limit any run-off discharge. The contractor would also be required to implement appropriate BMPs as part of the Stormwater Pollution Prevention Plan (SWPPP). These would include, but would not be limited to; preventing runoff from unprotected slopes, keeping disturbed areas to a minimum, and developing check berms and de-silting basins during construction activities to prevent sediment transport off the site. The BMPs would be maintained to ensure construction-generated sediment would not leave the plant.

In addition, Metropolitan would implement traffic-related BMPs. These would include, but are not limited to, limiting truck idling in excess of 10-15 minutes, and providing temporary traffic controls measures to maintain smooth traffic flow (such as flag persons) during all phases of construction.

6. The Draft EIR text in Section 3.1 Aesthetics, page 3.1-17, has been revised to include the correct location of the solar generation facilities:

Metropolitan is in the process of removing the existing chain-link fence located along the plant's southwest boundary (along Sedalia Avenue). The fence will be replaced with a solid decorative concrete wall and landscaping. The decorative concrete wall has been approved as part of a separate project and will be constructed along Sedalia Avenue. The decorative wall will be similar to the existing solid decorative wall found near the plant's front entrance at Moreno Avenue. Drought tolerant landscaping, similar to the existing landscaping along Moreno Avenue and the Water Quality Building at Gladstone and Sedalia avenues would be planted along Sedalia Avenue. In addition, a block wall would be constructed between the plant's southwestern perimeter and residences along Highland Drive and between the plant and two residences along Capri Lane. The block wall would be approximately seven feet tall with double coil wire on top,

similar to the wall along the northern perimeter of the plant. The construction of all the walls would start sometime in the summer of 2014. The new walls and landscaping would change the Sedalia Avenue views from current condition. Nevertheless, the Solar Generation Project would be visible from Sedalia Avenue, but would be partially screened by the new decorative wall and landscaping. When the nine-foot panels are perpendicular to the ground, they would be visible over the seven-foot wall; however, panel visibility would be for a short period of time each day, for the majority of the day the panels would not be visible over the wall. Although the solar facility would be substantially different in appearance from the existing vacant lot, the overall visual character would not be significantly degraded as the solar panels would be located entirely within an existing water treatment facility. Impacts would be considered less than significant for the ~~southwestern~~~~eastern~~ solar facility and less than significant with mitigation for the ~~northeastern~~~~western~~ facility.

7. Minor revisions and additions to the air quality mitigation measures have been made. The revisions were made to address South Coast Air Quality Management District's (SCAQMD) comments and to make the mitigation measures more stringent. The text has been revised within the following sections of the Draft EIR, Executive Summary (page ES-7), Section 3.2 Air Quality (pages 3.2-18, 3.2-20, 3.2-21), and Chapter 4 Cumulative Impact (page 4-4). The text changes to the mitigation measures are provided below:

Executive Summary Page ES-7

<p>Impact 3.2-2: The proposed project could violate air quality standards or contribute substantially to an existing or projected air quality violation.</p>	<p>AQ-1: During construction, the Contractor shall use <u>2010 and newer diesel haul trucks (e.g., material delivery trucks, import/export trucks). If not feasible, the Contractor shall use trucks that meet Environmental Protection Agency 2007 NO_x emission requirements.</u></p> <p>AQ-12: All <u>off-road diesel-powered construction equipment greater than 50 horsepower (hp) shall meet or exceed Environmental Protection Agency Tier 4 emission standards, when feasible where available. The contractor shall be required to document efforts to utilize equipment meeting Tier 4 emission standards including providing justification when using Tier 4 certified or better equipment is not feasible. In the event Tier 4 equipment is not commercially available, contractor shall require Tier 3 equipment with the highest level available emission control equipment. In the event Tier 3 equipment is not available, contractor shall require Tier 2 equipment with the highest level available emission control equipment. All construction equipment shall be outfitted with best available control technology (BACT) devices that are certified by the California Air Resources Board (CARB). Any emissions control device used shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. A copy of each unit's certified tier specifications, BACT documentation, and CARB or South Coast Air Quality Management District (SCAQMD) operating permit shall be provided at the time of mobilization of each unit of equipment.</u></p>	<p>Significant and unavoidable</p>
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Air Quality Page 3.2-18

To reduce the NO_x emissions generated during the project's construction, Mitigation Measure AQ-1 would be implemented, which requires all off-road construction equipment used during the project's site preparation phase to meet Tier 4 emissions standards established by the USEPA. Implementation of Mitigation Measures AQ-1 and AQ-2 would reduce the NO_x emissions from off-road construction equipment exhaust by approximately 90 percent. The total mitigated NO_x emissions that would result from implementation of Mitigation Measures AQ-1 and AQ-2 during the site preparation phase of the construction activities are shown in **Table 3.2-5**. As shown, the maximum daily NO_x emissions generated by the project would be reduced to 107 pounds per day with mitigation. However, this would still be above SCAQMD's daily 100 pounds per day significance threshold for NO_x.

Overall, despite implementation of Mitigation Measures AQ-1 and AQ-2, the project's maximum daily NO_x emissions would continue to exceed the SCAQMD's regional significance threshold due to overlapping construction activities and associated equipment and truck exhaust emissions. Therefore, the project's regional air quality impact associated with NO_x emissions during construction would be significant and unavoidable.

*Air Quality Page 3.2-20****Mitigation Measures***

AQ-1: During construction, the Contractor shall use 2010 and newer diesel haul trucks (e.g., material delivery trucks, import/export trucks). If not feasible, the Contractor shall use trucks that meet Environmental Protection Agency 2007 NO_x emission requirements.

~~**AQ-12:** All off-road diesel-powered construction equipment greater than 50 horsepower (hp) shall meet or exceed Environmental Protection Agency Tier 4 emission standards, when feasible where available. The contractor shall be required to document efforts to utilize equipment meeting Tier 4 emission standards including providing justification when using Tier 4 certified or better equipment is not feasible. In the event Tier 4 equipment is not commercially available, contractor shall require Tier 3 equipment with the highest level available emission control equipment. In the event Tier 3 equipment is not available, contractor shall require Tier 2 equipment with the highest level available emission control equipment.~~ All construction equipment shall be outfitted with best available control technology (BACT) devices that are certified by the California Air Resources Board (CARB). Any emissions control device used shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel

emissions control strategy for a similarly sized engine as defined by CARB regulations. A copy of each unit's certified tier specifications, BACT documentation, and CARB or South Coast Air Quality Management District (SCAQMD) operating permit shall be provided at the time of mobilization of each unit of equipment.

Air Quality Page 3.2-21

As discussed in Impact 3.2-2 above, the project's unmitigated construction emissions would result in the exceedance of SCAQMD's regional threshold for NO_x. As described above, this results in a cumulative considerable net increase of regional NO_x. Although Mitigation Measures AQ-1 and AQ-2 would be implemented to reduce NO_x emissions from construction equipment, the project's maximum daily regional NO_x emissions would still exceed the SCAQMD's regional significance threshold of 100 pounds per day for NO_x. This is mainly due to overlapping construction activities and associated equipment and truck exhaust emissions. Therefore, even with mitigation, the project's short-term construction emissions contribution to cumulative air quality impacts would be significant and unavoidable.

With regards to operational emissions, the project's operational emissions currently are not exceeding the SCAQMD significance thresholds for any of the criteria pollutants. The implementation of the proposed project would replace old technology with new technology increasing the operation efficiency and reducing the operation emissions at the Weymouth Plant. When the CUF and vendor supplier are unavailable the plant would require one additional railcar and approximately five additional trucks per week to deliver chlorine to Metropolitan facilities. The additional truck trips would be temporary and would occur when the CUF and vendor supplier experience service interruptions. In addition, operational activities (monthly testing) would include one truck trip per month to deliver chlorine to Metropolitan's other water treatment facilities. The proposed project's operational emissions would have a minimal contribution to cumulative air quality impacts and would be less than significant.

Mitigation Measures

Implement Mitigation Measures AQ-1 and AQ-2

Significance after Mitigation: Significant and unavoidable during construction

Cumulative Impacts Page 4-4

Construction

Concurrent construction of the proposed project with other projects in the air basin would generate short-term emissions of criteria pollutants and toxic air contaminants, including suspended and inhalable particulate matter and equipment exhaust emissions. Other projects that would contribute to cumulative impacts on

air quality are shown in Table 4-1. In addition to the projects identified on Table 4-1 the Weymouth Plant has been under ongoing construction for approximately 10 years to comply with more stringent water treatment regulations. The implementation of the proposed project would contribute to the ongoing construction for another four years (project completion in 2017). The proposed project would exceed the maximum daily NO_x during the construction phase in year 2016. With the implementation of Mitigation Measures AQ-1 and AQ-2, the maximum daily NO_x emissions generated by the project during construction would still exceed SCAQMD's daily significance threshold resulting in a significant unavoidable impact. As a result, concurrent construction of the proposed project with other projects including past projects within the Weymouth Plant would exceed SCAQMD significance thresholds for criteria air pollutants, resulting in cumulatively considerable air quality impacts during the construction period.

8. The following text addition has been made to Section 3.2 Air Quality under *Rules and Regulations* on page 3.2-13 of the Draft EIR

Rule 1403 - Asbestos Emissions From Demolition/Renovation Activities. This rule is intended to specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM). The requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials (ACWM). All operators are required to maintain records, including waste shipment records, and are required to use appropriate warning labels, signs, and markings.

CHAPTER 2

Response to Public Comments

The responses to comments included in this section are numbered to correspond to the number of each comment as it appears in the margins of each comment letter in Appendix A.

Where the responses indicate additions or deletions to the text of the Draft EIR, additions are included as underlined text, deletions as ~~stricken text~~. The revisions do not substantially alter the conclusions in the Draft EIR.

Comment letter(s) were received from the following agencies and interested parties during the 45-day public review period (October 21, 2014 to December 6, 2014) for the Draft EIR:

- A. Mr. and Mrs. Charles and Sharon Even – November 17, 2014;
- B. California Department of Transportation (Caltrans), District 7 – November 20, 2014;
- C. South Coast Air Quality Management District (SCAQMD) – December 2, 2014;
- D. City of La Verne – December 3, 2014; and
- E. Ms. Donna Butler – December 4, 2014.

Responses to the individual comments are presented below.

Mr. and Mrs. Charles and Sharon Even

- A1. As stated in Chapter 7 Report Preparers on page 7-1 of the Draft EIR, the environmental document was commissioned by Metropolitan (Lead Agency) and written by an independent consulting firm, Environmental Science Associates. Technical support was provided by Terry A. Hayes Associates LLC, Applied EarthWorks Inc., VisionScape Imagery, and Arch Beach Consulting, Inc.
- A2. The Weymouth Plant is not an industrial facility. While the Weymouth Plant might appear to be an incongruity in the midst of residential and commercial neighborhoods, the plant was constructed in 1939 and placed into service in 1941 when La Verne was predominantly an agricultural community. La Verne's growth began after World War II with the removal of orchards, expansion of the college, and new residential, school, commercial, and industrial development built up around the plant. The Plant is zoned "Official" and "Institutional" according to the city's General Plan.

The proposed project does not constitute a plant expansion. The proposed project would occur entirely within the existing boundary of the Weymouth Plant, located at 700 Moreno Avenue. The improvement projects will not increase the amount of water the Weymouth Plant can treat but rather improve the methods of how the water is treated in compliance with more stringent drinking water regulations. The improvements would upgrade aging infrastructure to help ensure safe drinking water for years to come, increase and maintain operational reliability, enhance features of the plant that protect public safety and the environment, improve stormwater management, and reduce off-site energy demands and lower greenhouse gases. The project objectives are described in greater detail in Chapter 2 Project Description on page 2-3 of the Draft EIR.

The project includes several facility improvements such as the Filter Rehabilitation Project, Chlorine Systems Upgrade and Weymouth Improvements Project. In addition, the proposed project includes a Solar Generation Project which would add solar facilities to the southwest and northeast corners of the existing water treatment facility to offset the energy demands of the plant. A description of the improvements proposed for the project can be found in Chapter 2 Project Description, starting on page 2-1 of the Draft EIR.

- A3. Several sensitive receptors are located around the existing water treatment plant as identified in Section 3.6 Hazards and Hazardous Materials, Table 3.6-1, including eight schools within a quarter of a mile of the site. Air quality dispersion modeling was performed following South Coast Air Quality Management District's (SCAQMD) methodology for analyzing localized air quality impacts to determine whether construction activities at the project site would cause or contribute to adverse localized air quality impacts on nearby off-site sensitive receptors. The required major air pollutants analyzed included ozone (O₃), respirable particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), lead (Pb), and greenhouse gases (GHG). The results of the model determined that localized pollutant concentrations during project construction would not exceed the SCAQMD significance thresholds. The air quality and greenhouse gas technical reports can be found in Appendix 2 of the Draft EIR.

The Weymouth Plant has been in operation since the early 1940's and has never had an incident that has resulted in a release of toxic gases. Metropolitan is required to comply with all local, State and federal laws on handling of chemicals on-site.

- A4. Section 3.8 Noise and Vibration concluded that the proposed construction activities would result in a significant and unavoidable noise impact due to a temporary increase in ambient noise levels during construction activities that occur near the perimeter of the plant. The construction activities at the perimeter of the plant would be in proximity to residences, resulting in a temporary increase in ambient noise at those locations. However, the operation of the proposed project would result in a less than significant operational noise impact.

This significant and unavoidable construction noise impact finding would require Metropolitan to prepare a statement of overriding considerations, as required by *State CEQA Guidelines* Sections 15091 and 15093, for noise impacts resulting from the temporary construction phase. A statement of overriding considerations is prepared when a proposed project will result in the occurrence of significant effects which are identified in the EIR but are not avoided or substantially lessened. This information is provided to Metropolitan's decision makers to determine whether the economic, legal, social, technological, or other benefits of the proposed project outweigh the unavoidable adverse environmental effects of the project.

The Draft EIR concluded in Section 3.8 Noise and Vibration that vibration impacts at the nearest sensitive receptors would be less than the 0.2 inch per second threshold designated by the Federal Transit Administration (FTA). As a result, the proposed project was determined to have less than significant impacts related to vibration. See page 3.8-17 of the Draft EIR.

- A5. The Draft EIR concluded in Section 3.2 Air Quality that the proposed construction activities would result in a significant and unavoidable air quality impact as stated in response A4. This finding would require Metropolitan to prepare a statement of overriding considerations as required by *State CEQA Guidelines* Sections 15091 and 15093, for air quality impacts resulting from the construction phase. The reason for the air quality impact is due to the overlapping construction of different projects. The air quality model was prepared assuming the worst case scenario with the majority of the proposed projects being constructed simultaneously, resulting in a significant air impact for NO_x. It is unlikely all the projects would be constructed simultaneously; however, the worst-case scenario was analyzed to ensure full public disclosure of all potential impacts. After implementation of mitigation measures required by the Draft EIR, NO_x would exceed SCAQMD significance thresholds by seven pounds per day. However, if one project that was originally planned to be constructed incurs a delay in the schedule and is pushed out a year, then the construction emissions calculated in the model would be below the SCAQMD significance threshold and the overall project would result in a less than significant impact to air quality. The operation of the proposed project would result in a less than significant operational air quality impact.
- A6. The proposed project would not result in significant impacts to hydrology and water quality (i.e., violations to water quality standards or waste discharge requirements, a source of polluted run-off, or substantially degrade water quality) during the construction or operation phase. See Section 3.7 Hydrology and Water Quality of the Draft EIR for a discussion of the proposed project's potential impacts, all of which are concluded to have no impact or a less than significant impact.
- A7. The proposed project would not greatly escalate the risk of accidents involving movement of railcar and truck cargo trailer loads of chlorine. As described in Section 2 Project Description of the Draft EIR, a component of the Chlorine System Upgrades project would include another chlorine unloading station in the existing chlorine containment building.

These modifications would allow the plant flexibility by acting as a chlorine transfer station in the event that both of the existing chlorine supply facilities experience service interruptions. Should this occur, the Weymouth Plant would receive an additional rail delivery (equivalent to five truck cargo trailers) per week during that time. Furthermore, chlorine transport routes and transportation safety requirements are implemented by the California Highway Patrol (CHP).

- A8. Neighborhood aesthetics would not be degraded due to the proposed project. As stated in response A2, the proposed project would occur entirely within the existing boundaries of the Weymouth Plant and no projects are proposed off-site. Furthermore, the Aesthetics Section of the Draft EIR evaluated the impacts of the proposed project and concluded a less than significant impact with mitigation for visual character and less than significant impact for light and glare.
- A9. The proposed project does not introduce any new gases or chemicals to the Weymouth Plant. Any upgrades to the chemical facilities would be built to current stringent seismic standards in compliance with the California Building Code (CBC). As discussed on page 16 of the Initial Study (included in Volume 2, Appendix A of the Draft EIR), the nearest active fault is the Sierra Madre fault located approximately five miles south of the project site. And although there are active and potentially active faults in the area, the potential for surface rupture at the project site has been determined to be considered low. The Chlorine Building, where the railcars are stored, was constructed in 2001 and was built to seismic standards at that time. The Chlorine Building is seismically evaluated every five years following California Accidental Release Prevention Program (CalARP) Guidelines and is up to current seismic standards. Metropolitan will adhere to standard engineering and construction practices and conform to the CBC and other applicable seismic standards and guidance.
- A10. As discussed on page 3.6-12 Hazard and Hazardous Materials of the Draft EIR, project-related infrastructure would not emit hazardous materials or involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Once installed, the photovoltaic (PV) modules would produce no waste during operation of the proposed solar generation facilities. In addition, the transformers associated with the panels would have secondary containment to prevent the unexpected release of mineral oil from the transformers.

In the unlikely event that the PV panels were to break, broken panels would be disposed of in compliance with the manufacturer's requirements and applicable regulations by trained Metropolitan staff. Any potential accidental release from broken PV panels or release of mineral oil would be contained entirely within the Weymouth Plant. Compliance and adherence to applicable safety regulations and best management practices (BMPs) would ensure hazard and hazardous materials impacts to nearby schools and the community are reduced to a less than significant level.

A11. The proposed project would not have unavoidable increase in obtrusive light, glare, and noxious odors. As described in Section 3.1 Aesthetics of the Draft EIR, nighttime lighting for the solar generation facilities for security purposes is required. The lighting structures for the proposed project would be shielded and directed away from the neighborhoods and other sensitive receptors as is required by standard Metropolitan specifications. Although final design and layout of the lighting structures have not been finalized; they would be similar to what currently exists for all the buildings throughout the plant: light fixtures will be approximately twenty feet high and will be on a timer. Nighttime security lighting would be directed downward to avoid a nuisance to the surrounding areas. As such, all new lighting would be installed and maintained in a similar manner to what currently exists at the plant.

As stated in Section 3.1 Aesthetics of the Draft EIR, solar panels are designed to absorb light, not reflect it. Glare is rare because of the material types used to construct the panels, anti-reflective panel protective coating, and the tracking technology. In addition, project design features such as a perimeter wall, setbacks, and panel heights restricted to seven feet, further support the analysis and conclusions presented in the Draft EIR of less than significant impacts due to light and glare.

As discussed on page 3.2-24 Air Quality of the Draft EIR, odors during construction of the proposed project would be localized and generally confined to the immediate area surrounding the project site. These odors would be intermittent and temporary in nature and would not be considered a significant impact to the environment. In addition, the plant currently does not emit any adverse odors as part of its normal operating conditions and the proposed project would not add any additional equipment or processes that would emit adverse odors.

A12. Chlorine has been in use at the Weymouth Plant for disinfection purposes since plant operations began in the early 1940s. Chlorine disinfection of drinking water is an essential part of the water treatment process, integral to ensuring compliance with drinking water regulations and protecting public health by eliminating waterborne diseases. As described in the Hazards and Hazardous Materials Section of the Draft EIR, no additional chlorine quantities would be stored on the site and no additional railcars or truck cargo trailers trips would be required beyond current normal operating conditions at the Weymouth Plant. Should the Chemical Unloading Facility (CUF) and vendor supplier experience service interruptions, the Weymouth Plant would act as a chlorine back-up facility and chlorine transfer operations would be supplemented by the Plant. As described in comment response A7 above, the number of railcars and operational truck trips at the plant would increase; however, no additional volumes of chlorine would be stored on the site.

A13. As described in Section 3.9 Transportation and Traffic of the Draft EIR, and in the *Revised Construction Traffic Level of Service (LOS) Analysis for the F.E. Weymouth Water Treatment Plant* included in Volume 2 (Appendix D of the Draft EIR), the proposed project would not significantly increase traffic congestion in the project vicinity. Furthermore, a comment letter received from the California Department of Transportation stated there

would be no impact to road and highway traffic. Please see response to comment B1 below for traffic impacts.

Please see response to comment A11 above for a discussion on light and glare. The solar panels would absorb light and would be contained behind concrete and decorative walls and vegetation. As seen on the visual simulations prepared by VisionScape Imagery (Figures 2 through 5), the panels would not be visible above the wall or the vegetated fence. As a result of the plant's perimeter screening, the solar panels would not cause a glare impact to traffic. Discussion of the view simulations is further discussed in response to comment E3 below.

- A14. Please see response to comment A1 above regarding a qualified independent consultant firm.

Mitigation measures were developed in accordance with the *State CEQA Guidelines* Section 15126.4 and determined by the Draft EIR analyses.

Please see response to comment A2 above regarding plant expansion. The proposed project is not an expansion of plant water treatment capabilities or facilities, but an improvement project taking place within existing plant boundaries.

California Department of Transportation

- B1. The determination made by Caltrans is consistent with the findings of the Draft EIR. The commenter states the proposed project would generate less traffic than the peak construction period during permanent operations of the treatment plant and concludes the proposed project would not have impacts to State facilities.
- B2. One of the proposed project objectives, as well as one of the objectives of the Weymouth Improvements Project, is to improve stormwater management. As described on page 2-11 (Project Description) of the Draft EIR, the Stormwater Management Improvements project would implement long-term engineering improvements throughout the Weymouth Plant to enhance, control, and reduce potential pollutants in stormwater runoff. The improvements could include, but are not limited to, erosion control measures such as landscaping, bio-swales or larger scale treatment facilities (e.g., detention basins, stormwater treatment plants) to filter sediments and treat on-site pollutants within

As described on page 3.7-11 of Section 3.7 Hydrology and Water Quality of the Draft EIR, the Weymouth Plant has a current MS4 Permit for Los Angeles County. The Permit contains requirements to improve efforts to reduce the discharge of pollutants in stormwater runoff to the maximum extent practicable and achieve water quality standards. In addition, Metropolitan is in compliance with the City of La Verne's municipal code requirements of Chapter 13.50 Stormwater and Urban Runoff Pollution Control.

- B3. Page 3.9-4 Transportation and Traffic of the Draft EIR summarizes the Caltrans regulations for oversized construction equipment. Metropolitan will comply with all federal, State and local regulations and obtain all necessary permits. See response C3 below for additions to the Draft EIR regarding off-peak traffic hours.

South Coast Air Quality Management District

- C1. During demolition or removal of building materials for all rehabilitation or refurbishment of aging structures that have the potential to contain asbestos, Metropolitan will comply with all federal, State and local regulations, including South Coast Air Quality Management District (SCAQMD) Rule 1403. At a minimum, as part of Metropolitan's contractor specification requirements, a work plan detailing all potential locations of asbestos containing materials would be prepared prior to construction activities. The plan would contain, but would not be limited to, use of proper personal protective equipment (PPE), proper removal techniques, and a designated disposal location.

The following text addition has been made to Section 3.2 Air Quality under *Rules and Regulations* on page 3.2-13 of the Draft EIR

Rule 1403 - Asbestos Emissions From Demolition/Renovation Activities. This rule is intended to specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM). The requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfilling requirements for asbestos-containing waste materials (ACWM). All operators are required to maintain records, including waste shipment records, and are required to use appropriate warning labels, signs, and markings.

- C2. In response to this comment, a new mitigation measure has been added and Mitigation Measure AQ-1 has been modified as follows:

AQ-1: During construction, the Contractor shall use 2010 and newer diesel haul trucks (e.g., material delivery trucks, import/export trucks). If not feasible, the Contractor shall use trucks that meet Environmental Protection Agency 2007 NO_x emission requirements.

AQ-12: All off-road diesel-powered construction equipment greater than 50 horsepower (hp) shall meet or exceed Environmental Protection Agency Tier 4 emission standards, when feasible where available. ~~The contractor shall be required to document efforts to utilize equipment meeting Tier 4 emission standards including providing justification when using Tier 4 certified or better equipment is not feasible. In the event Tier 4 equipment is not commercially available, contractor shall require Tier 3 equipment with the highest level available emission control equipment. In the event Tier 3 equipment is not available, contractor shall~~

~~require Tier 2 equipment with the highest level available emission control equipment.~~ All construction equipment shall be outfitted with best available control technology (BACT) devices that are certified by the California Air Resources Board (CARB). Any emissions control device used shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. A copy of each unit's certified tier specifications, BACT documentation, and CARB or South Coast Air Quality Management District (SCAQMD) operating permit shall be provided at the time of mobilization of each unit of equipment.

The proposed project construction period would all occur post-January 1, 2015; therefore, the additional construction mitigation measure (bullet 3) describing construction project start to December 31, 2014 is not applicable.

In regard to the sixth bullet about SCAQMD "SOON" funds (Surplus Off-Road Opt-In for NO_x), Metropolitan will encourage Contractors to apply for the SOON funds and include this information in the project specifications.

- C3. In response to this comment, the following additions have been made to the end of *Section 2-6 Construction Characteristics* on page 2-12 of the Draft EIR.

In addition, Metropolitan would implement traffic-related BMPs. These would include, but are not limited to, limiting truck idling in excess of 10-15 minutes, and providing temporary traffic controls measures to maintain smooth traffic flow (such as flag persons) during all phases of construction.

In addition, Mitigation Measure Noise-3 requires that all haul routes be restricted to arterial roads and avoid residential areas, whenever feasible.

In regard to the third and fourth bullets about traffic flow, Section 3.13 Transportation and Traffic section of the Draft EIR concluded that the proposed project would create a minimal increase to traffic when compared to existing conditions. The Draft EIR concluded that with the addition of the project construction traffic, surrounding intersections would continue to operate with satisfactory level of service (LOS) with zero to minimal increases in the volume to capacity ratio (V/C). All traffic related impacts due to construction and operation of the proposed project were determined to be less than significant; therefore, the recommended construction measures for traffic flow schedule and rerouting trucks would not be necessary.

In regard to the fifth bullet about a community liaison officer, Metropolitan has a community liaison representative who works with the community to address questions, complaints and concerns. The community liaison would be available to discuss the proposed project with residents and other community members as needed.

City of La Verne

- D1. The determination made by the City of La Verne is consistent with the findings of the Draft EIR.
- D2. Metropolitan has complied with the City's replacement guidelines for heritage oak trees in the past and plans to continue coordination efforts for heritage tree protection.
- D3. Metropolitan will coordinate with the City and provide documentation related to Mitigation Measure CUL-1 (Filter Rehabilitation, Basin Nos. 5-8 Refurbishment).

Ms. Donna Butler

- E1. The Solar Generation Project is intended to augment the power supply of the Weymouth Plant; therefore, the project would be directly related to water distribution and would not be subject to zoning or building ordinances per California Government Code Section 53091.

In addition, please refer to Comment D1 from the City of La Verne comment letter (attached to this document as Appendix A), where the City concurs with the findings stated in the Draft EIR that Metropolitan is exempt from local building ordinance and planning codes per California Government Code Section 53091.

The statement is incorrect that the two sites have never been utilized as part of the water treatment plant. The two sites (northeast site and southwest site) are owned by Metropolitan and are part of the Weymouth Plant property. The sites were previously leased to the nurseries and the leases were terminated when they expired in anticipation of future treatment plant upgrades. The two sites are generally vacant but utilized for treatment plant operations periodically. Currently, the northeast site is used for pipeline sections fabrication and storage and apprentice training. A small section of the southwest site has a temporary residual solids basin while permanent basins are in construction. Block walls and stormwater drainage improvements are currently in construction at the southwest site. Previously, both sites were used for construction contractor staging areas (parking and equipment storage).

- E2. The statement made by the commenter describing the Solar Generation Project is correct. As stated on page 2-7 Project Description of the Draft EIR, solar panels would be pole-mounted, would consist of a single-axis tracking system so that the panels can track the sun's path at a 45-degree angle from east to west, would be embedded within concrete foundations, and would have a combined total of approximately 170 panels. In response to comments received, Metropolitan has evaluated the proposed project and made modifications to the solar panel design. The entire solar panel array system selected for the proposed project will be approximately seven feet tall (panel plus the foundation).

There are many types of solar generation array systems and the technology has changed over the years. The solar generation facility located adjacent to the San Dimas High School is of older technology and this technology is not considered for the Weymouth Plant. The

solar panel array system near San Dimas High School is large and bulky and likely unable to generate the three megawatt power supply required to reduce power costs at the Weymouth Plant. The solar generation facility located by the San Dimas Sheriff Station and Forest Service appears to be of recent technology compared to the facility near the High School. Although final design and layout of the solar facilities have not been finalized, the panels would likely face southwards to track the sun's path.

- E3. Although the current site of the future solar facility is primarily vacant, it is within the boundaries of the Weymouth Plant; the solar panel array system would be consistent with the existing character of the plant facilities. The Weymouth Plant is enclosed by walls and fencing for security purposes: decorative block walls are constructed along public streets (along Moreno and Sedalia streets), solid block walls are constructed between the plant and residences (along Highland/5th streets and Ancona/Vera Cruz streets), and chain-link fencing with vegetation along Wheeler Avenue. The decoration, vegetation, and trees were placed to soften the appearance of the plant from the adjacent community. In addition, Mitigation Measure AES-1 would require Metropolitan to actively maintain screening along areas that contain existing vegetation (along Wheeler Avenue) at the northeast site.

In response to public comments received, Metropolitan commissioned a consultant to prepare visual simulations of the solar generation facilities. A consultant, VisionScape Imagery, prepared four visual simulations of the proposed solar generation facilities. The visual simulations were prepared based on the following assumptions: (1) the solar panel array system would be approximately seven feet high (panel plus the foundation); (2) a setback from the plant property boundary of approximately 20 feet; (3) approximately seven-foot tall chain link fence with vegetation at the northeast site; and (4) approximately seven-foot tall solid block wall at the southwest site.

The visual simulations can be found within Appendix A of this Final EIR. Figure 1 shows the location of the visual simulations. Two views were selected to mirror views KVP 5 and KVP 6 in the Aesthetics Section of the Draft EIR. All four views were taken from public vantage points (i.e., along public roads). The simulations indicate the panels located at the northeastern site would be screened by the vegetated fence, as seen on Figures 2 and 3. The only area from which the panels would be visible from a public vantage point is through the entrance gate that does not have vegetation growing on it. As seen on Figures 4 and 5, the simulations indicate the solar panels within the southwestern facility would not be visible over the block wall.

Metropolitan also modified the project design to reduce potential solar panel visibility by selecting an approximately seven-foot tall solar panel array system and incorporating setbacks around the perimeter of the solar facilities. The visual simulation used a setback of twenty feet; however, the proposed setbacks for the southwestern solar facility from residences along Highland Drive will be greater, ranging from thirty to forty feet. The westernmost arrays will have a setback of forty feet from residences along Highland Drive due to an existing stormwater catch basin, while the easternmost arrays will have a setback of thirty feet from homes along Highland Drive. As a result, the panels would not pose a

visual impact due to the perimeter solid block wall, proposed setback and new solar facility design of a seven-foot tall solar panel array system. The visual simulations can be found within Appendix A of this Final EIR.

- E4. The Solar Generation Project is essential to the plant. As described on page 2-3 of the Draft EIR, the project objectives are: improve the reliability of the power supply and reduce power costs at the Weymouth Plant; reduce carbon emissions by using renewable energy; and, support the State's greenhouse gas reduction initiatives (Assembly Bill 32). The Weymouth Plant requires over ten million kilowatt-hour per year to treat and transport water throughout southern California; energy demand will increase by 30 to 50 percent when the ozonation facilities commence operation in 2016/2017. The three megawatt Solar Generation Facilities project would meet approximately 50 percent of the energy needs of the Weymouth Plant.

An error was identified in naming the two sites. In response to this comment, the following modifications have been made to Section 3.1 Aesthetics to the last paragraph on page 3.1-17:

...Although the solar facility would be substantially different in appearance from the existing vacant lot, the overall visual character would not be significantly degraded as the solar panels would be located entirely within and existing water treatment facility. Impacts would be considered less than significant for the south~~western~~~~eastern~~ solar facility and less than significant with mitigation for the north~~eastern~~~~western~~ facility.

- E5. Metropolitan is currently in the process of replacing the chain-link fence that is located along the plant's southern boundary, adjacent to the homes along Highland Drive, with an approximately seven-foot tall solid block wall to provide screening for the adjacent residences. Further, Metropolitan has modified the project design to include a seven-foot-tall panel array system rather than the six to nine feet system discussed in the Draft EIR.
- E6. As stated in the Draft EIR, the Aesthetics section concluded that the proposed project would result in a less than significant impact for the southwest solar facility and a less than significant impact with incorporation of mitigation for the northeast facility. The Draft EIR was prepared following *State CEQA Guidelines* which states that mitigation measures are required "where feasible, to avoid or substantially reduce significant environmental impacts that would otherwise occur." Analysis of the southwest solar facility concluded that impacts were considered less than significant and did not require mitigation measures.

State CEQA Guidelines require public views associated with scenic vistas, scenic resources, state scenic highways, historic buildings, and visual character of the site or surroundings be analyzed. This analysis is described in the Aesthetics section of the Draft EIR. For the proposed project, the visual character of the site was assessed where the public could potentially view the proposed project and these locations are along city streets and intersections, public parks and schools, and at a community church. The locations are identified in Figure 3.1-2 to Figure 3.1-8 of the Draft EIR. The only public vantage point

from the south side of the plant is at the intersection of Esther and 5th streets as was described in the Draft EIR.

Based on comments received on the Draft EIR, Metropolitan commissioned visual simulations performed by VisionScape consultants (as described in response E3 above). Although not required, a vantage point (Figure 4 of the Visual Simulations) was taken on Highland Drive between two residential homes because it has the widest side yard providing views into the southwest solar facility site. As discussed in response E3 above, with the seven-foot tall block wall, grading difference between the two properties, storm drain separating the plant from the residence, and the proposed thirty- to forty-foot setback distance, the solar panel array system would result in a less than significant impact related to Aesthetics.

- E7. Please see response E3 above for a discussion on project modifications and setbacks. A setback of approximately thirty to forty feet along the plant's southern border of the southwest solar facility is proposed. The setback will be used for security access roads. A forty-foot setback will be required for the westernmost arrays at this facility in order to avoid an existing stormwater catch basin that is located near Sedalia Street. A thirty-foot setback will be used for the easternmost solar panel arrays of the southwestern facility.
- E8. Final design and layout of the solar facilities have not been finalized; however, based on comments received, Metropolitan has made modifications to the project design. A solar panel array system (panel plus foundation) of approximately seven feet tall is proposed. The design and placement of solar panel arrays would take into consideration all environmental factors including the most effective tracking angle to complement the sun's location, surrounding community impacts, and existing below-ground facilities, where feasible.
- E9. Please see responses E3, E5, E7, and E8 above regarding setbacks, solar panels design, and visual simulations.
- E10. As stated in Section 3.1 Aesthetics of the Draft EIR, solar panels are designed to absorb light, not reflect it. Glare is rare because of the material types used to construct the panels, anti-reflective panel protective coating, and the tracking technology. In addition, project design features such as a perimeter wall, setbacks, and panel heights restricted to approximately seven feet, further support the analysis and conclusions presented in the Draft EIR of less than significant impacts due to light and glare.
- E11. The Aesthetics section of the Draft EIR indicated nighttime lighting for the solar generation facilities for security purposes is required. The aesthetics analysis indicated there would be a less than significant impact due to nighttime lighting. Further, in response to comments received, Metropolitan has modified the proposed project to use light fixtures that will have an approximate height of twenty feet, be on a timer, and be consistent with other fixtures currently used on the site. Lighting would be directed downward to avoid nuisance to the surrounding areas. In addition, all new lighting would be installed and maintained in a similar manner to what currently exists at the plant.

E12. Nighttime lighting will be required for security purposes for the Solar Generation Project. As previously discussed in response E11 above, the height of the new lighting will be approximately twenty feet. Final design and layout of the lighting locations have not been finalized; however, they will be installed along the security access road. As described in the Draft EIR, impacts associated with nighttime lighting are considered to be less than significant.

E13. Please see response A11 and E2 above regarding solar panels, glare, and anti-reflective coatings. Additional discussion can be found on page 3.1-19 of the Draft EIR for light and glare. Refer to Figures 3.1-19 and 3.1-10 for graphics/tables on common reflective surfaces and the Law of Reflection.

Please see response E2 above regarding the panel facing direction.

E14. Please see response E1 above for a discussion on the Plant's usage of the two solar facility sites for plant operations.

In accordance with Los Angeles County code, construction activities will occur during weekdays from 7:00 a.m. to 7:00 p.m. as allowed by local noise ordinances. This information on Noise is described in Section 3.8 Noise and Vibration of the Draft EIR. Metropolitan requires the construction contractor to start work after 7:00 a.m. On certain occasions, construction activities may be required before 7:00 a.m. This is to take advantage of cooler temperatures for concrete pouring/placement and workers finishing work before the extreme heat sets in on hot days. Occasionally, some noise could be heard outside of the work hours due to truck deliveries or the "beeping" alarm sound when large trucks back up. Please contact the Weymouth Plant at 909-392-5010 or Metropolitan's Public Affairs Liaison, Sal Vazquez, at 213-217-6752 should construction noise be heard outside of the authorized construction work hours. The Draft EIR includes three mitigation measures, Mitigation Measures Noise-1 through Noise-3, to help reduce noise-related impacts to the neighboring community during proposed scheduled work hours.

E15. During the installation of the poles to support the solar panels there may be minimal vibration associated with movement of construction equipment. As discussed on page 3.8-18 of the Draft EIR, the residences along Sedalia Avenue, Highland Drive and Capri Lane live approximately forty feet from the proposed construction activities. Vibrations from construction activities and equipment could be felt during pole installation activities when digging is required. However, vibration levels from the required equipment are less than the threshold designated by the Federal Transit Administration (FTA). This short-term vibration from construction would not impact the integrity of any structures. As such, ground-borne vibration impacts from the proposed project are considered less than significant, as described in the Draft EIR.

E16. As stated in Table 3.8-4 of the Noise Section of the Draft EIR, single-family residences located along Highland Drive have an unmitigated estimated dBA of 83.9. As discussed on page 3.8-12 of the Draft EIR, construction noise impacts would be considered significant and unavoidable during the temporary construction period of the Solar Generation Project.

As such, Mitigation Measures Noise-1 through Noise-3 would be implemented during construction of the Solar Generation Project. These mitigation measures do include the use of temporary noise barriers/curtains extending at least eight feet in height to be erected around the perimeter of the active construction area as described in Mitigation Measure Noise-1.

- E17. This is not the first time the Solar Generation Project is proposed for development. Metropolitan prepared a Mitigated Negative Declaration (MND) for the proposed project in 2009. The MND was made available to the City of La Verne and the community. In addition, a public meeting was held in the fall of 2009 at the La Verne city hall to discuss the project. The project was subsequently delayed but is now proposed for development. For this environmental document, the proposed project was described in the Draft EIR which was made available to the public on three separate occasions: (1) Notice of Preparation (review period from December 19, 2013 to February 26, 2014); (2) community meeting at city hall (February 26, 2014) and; (3) Draft EIR (review period from October 21 to December 6, 2014).

Please see response A1, A11, E7, E8, and E12 above regarding independent preparation of the Draft EIR document by a consulting firm, design implementations (block walls, setbacks) to screen the southwest site from residents, panel visibility, and mitigation measure adequacies.

Please see response E1 above regarding the Weymouth Plant zoning description and location of the solar generation facilities at the northwest and southeast sites. Furthermore, the two proposed sites are the only available locations within the plant property that would accommodate the 170 panels and inverters. As shown in Figure 2-2 Proposed Facilities of the Draft EIR, the plant is nearly built out.

The comments and concerns regarding the “economics” and quality of life have been noted. *State CEQA Guidelines* require certain environmental impacts to the project site be evaluated and these are described in the Draft EIR. This comment relates to the merits of the project – not to the environmental issues analyzed in the EIR. The comment will become part of the administrative record and be considered by the decision makers.

- E18. Metropolitan has made modifications to the proposed project based on comments received during the Draft EIR and suggestions made by the commenter requesting setbacks, minimal solar panel heights, and screening for the southwestern solar facility. Although final design and layout of the Solar Generation Project has not been finalized, Metropolitan has modified the design criteria for the proposed project as summarized below:

Setbacks

- Southwest facility: Approximately twenty feet along Sedalia Street and approximately forty feet from residences along Highland Drive (due to an existing stormwater catch basin) for the westernmost solar panel arrays and thirty feet from residences along Highland Drive for the easternmost solar panel arrays; and

- Northeast facility: Approximately twenty feet along Wheeler Avenue and approximately forty feet from residences along Ancona Street.

Light poles

- Maintain pole height at approximately twenty feet tall; lighting will be on a timer; lighting will face downward; located on the security access road as far as feasible from sensitive receptors.

Solar Panel Array System

- Panel system will be approximately seven feet tall (includes panel plus foundation).

Walls/Fence

- Southwest facility: Approximately seven-foot tall block wall along Highland Drive and Sedalia Street; and
- Northeast facility: Approximately seven-foot tall fencing with vegetation along Wheeler Avenue.

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APPENDIX A

Public Comments Received on the DEIR

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11/17/2014

Ms. Brenda Marines
Metropolitan Water District of Southern California
P.O. Box 54153
Los Angeles, CA 90054-0153

Re: Draft Environmental Impact Report #1471
Weymouth Water Treatment Plant, La Verne, CA

Dear Ms. Marines,

My wife and I have read the draft Environmental Impact Report for the Weymouth Water Treatment Plant Improvements Program dated October, 2014. We are very concerned with the serious, long-term, harmful effects that the proposed plant expansion will have on our health, the health of our children, and on the local environment.

The report was commissioned by the Metropolitan Water District. How can it be unbiased? Why was a qualified, independent, environmental engineering company not engaged to conduct the report?

A-1

Regarding the report, we have several specific concerns.

- This is a major industrial plant expansion taking place in the midst of a residential community. Improvements include construction of a railcar unloading station as part of a large scale modification to the existing chlorine treatment facility, as well as the installation of 170 solar panels covering 20 acres!
- Eight schools lie within a quarter mile radius of the plant, exposing the students to significant and constant air pollutants and toxic gas emissions.
- According to the report, harmful noise levels and vibration from the plant would be significant and unavoidable.
- The report cites that the adverse impact on air quality would be significant and unavoidable.
- The construction and operation of the expanded facility could result in violations of water quality standards or waste discharge requirements, provide a substantial source of polluted run-off, and otherwise substantially degrade water quality.
- The risk of accidents involving movement of railcar loads and truckloads of poisonous chlorine is greatly escalated.
- Neighborhood aesthetics would be degraded as a consequence of the large scale industrial expansion.
- An earthquake could cause the release of poisonous gases and chemicals into our neighborhood.
- The solar panels contain cancer-causing materials. The long-term effects on humans from the use of these panels and their disposition has not been determined.

A-2

A-3

A-4

A-5

A-6

A-7

A-8

A-9

A-10

- The unavoidable increase in obtrusive light, glare, and noxious odors will impact the quality of health and reduce property values. | A-11
- Storage of large quantities of hazardous materials presents unacceptable added risk to the community. | A-12
- Traffic congestion will worsen. The glare from the solar panels will increase traffic accidents in the vicinity. | A-13

The mitigates presented to these concerns and to other more technical issues presented in the report are inadequate. It would seem appropriate that an independent environmental impact report be conducted so that its conclusions may be compared with those in hand. Only then can an informed decision be reached by the Metropolitan Water District regarding the degree the harmful effects the plant expansion will present to our community. | A-14

We would appreciate your response to our concerns.

Sincerely,

Charles Even
Sharon Even
Charles and Sharon Even
1182 Lois Circle
La Verne, CA 911750

Cc Donald Kendrick, Mayor, City of La Verne
Grace Napolitano, US Representative, 32nd District



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*Serious drought.
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November 20, 2014

Ms. Brenda Marines
Metropolitan Water District
of Southern California
P.O. Box 54153
Los Angeles, CA 90054-0153

RE: F.E. Weymouth Water Treatment Plant
Improvement Program
Vic. LA-210/PM R46.65
SCH # 2013121074
Ref. IGR/CEQA No. 131260-NOP
IGR/CEQA No. 141042AL-DEIR

Dear Ms. Marines:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project would upgrade existing and/or construct new facilities at the Weymouth Plant to accommodate the plant's maximum operating capacity and update the overall facility. The Proposed Project would involve rehabilitating and refurbishing aging treatment structures, upgrading systems to improve treatment processes, enhancing worker safety, reducing carbon emissions with renewable energy, improving storm water management, and ensuring compliance with recent legislation pertaining to the State Drinking Water Act.

There are only 180 daily trips, 24/24 AM/PM peak hour trips during the construction period. The permanent operation of the facility would generate less traffic than the peak construction phase. Therefore, Caltrans concludes that this project will not have impact to the State facilities.

B-1

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State highway facilities without any storm water management plan.

B-2

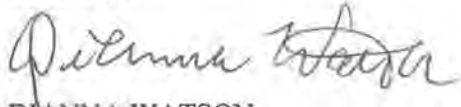
Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods.

B-3

Ms. Brenda Marines
November 20, 2014
Page 2

If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 141042AL.

Sincerely,



DIANNA WATSON
Branch Chief
Community Planning & LD IGR Review

cc: Scott Morgan, State Clearinghouse



**South Coast
Air Quality Management District**
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 s www.aqmd.gov

SENT VIA E-MAIL AND USPS:
EPT@mwdh2o.com

December 2, 2014

Ms. Brenda Marines
The Metropolitan Water District of Southern California
Environmental Planning Team
P.O. Box 54153
Los Angeles, CA 90053-0153

**Draft Environmental Impact Report (Draft EIR) for the Proposed
F.E. Weymouth Water Treatment Plant Improvement Program**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

In the project description, the Lead Agency proposes to rehabilitate and refurbish aging water treatment structures, system upgrades, and storm water management improvements. Since the project will include renovation and demolition, the Lead Agency must comply with SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities. Please provide additional information regarding compliance with SCAQMD Rule 1403 in the Final EIR.

C-1

Based on a review of the Draft EIR the Lead Agency determined that the proposed project will result in significant localized air quality impacts during construction. The air quality analysis demonstrated that the proposed project will exceed the SCAQMD’s CEQA localized construction significance thresholds for NOx even with mitigation measure AQ-1. This significant impact is primarily a result of extensive construction and use of heavy duty construction equipment.

Therefore, the SCAQMD staff recommends that pursuant to Section 15126.4 of the CEQA Guidelines the Lead Agency require the following additional mitigation measures in the Final EIR.

Additional Construction Mitigation Measures

- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and import/export) and if the Lead Agency determines that 2010 model year or newer diesel trucks cannot be obtained the Lead Agency shall use trucks that meet EPA 2007 model year NOx emissions requirements.
- Consistent with measures that other lead agencies in the region (including Port of Los Angeles, Port of Long Beach, Metro and City of Los Angeles)^[1] have enacted, require all on-site construction equipment to meet EPA Tier 3 or higher emissions standards according to the following:
 - Project start, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

C-2

^[1] For example see the Metro Green Construction Policy at:
http://www.metro.net/projects_studies/sustainability/images/Green_Construction_Policy.pdf

- o Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- o A copy of each unit’s certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
- o Encourage construction contractors to apply for SCAQMD “SOON” funds. Incentives could be provided for those construction contractors who apply for SCAQMD “SOON” funds. The “SOON” program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website: <http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>

↑
C-2

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.

Recommended Construction Mitigation Measures to Reduce NOx:

- Prohibit truck idling in excess of five minutes;
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow;
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hour to the extent practicable;
- Reroute construction trucks away from congested streets or sensitive receptor areas; and
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.
- Limit construction activities to the amounts analyzed in the Draft EIR.

C-3

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final EIR associated with this project.

Sincerely,

Jillian Baker

Jillian Baker, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

JB:JC

LAC 141021-12
Control Number



CITY OF LA VERNE CITY HALL

3660 "D" Street, La Verne, California 91750-3599

www.ci.la-verne.ca.us

December 3, 2014

The Metropolitan Water District of Southern California
Attn: Brenda Marines
Environmental Planning Team
P.O. Box 54153
Los Angeles, CA 90054-0153

RE: Draft EIR for the F.E. Weymouth Treatment Plant Improvement Program

Dear Ms. Marines:

Thank you for the opportunity to review the Draft Environmental Impact Report for the F.E. Weymouth Treatment Plant Improvement Program. The project includes several components, including the renovation of the Chlorine and Dry Polymer System Buildings; rehabilitation of the Oxidation Demonstration and the Wash Water Pump Station Facilities; construction and operation of solar generation facilities, seismic upgrades to the Water Quality Laboratory, Engineering Building, Central Stores, and Sedimentation Basin; media and internal basin component replacement to the Filtration Basins; and mechanical component upgrades to the Sedimentation/Flocculation Basins.

The City has reviewed the prepared document, and concurs with the statement made in section 2.9, Table 2-3, which states that Metropolitan projects directly related to the treatment, storage, or transmission of drinking water are exempt from local planning ordinances and local building codes (California Government Code Section 53091). The components of this project listed above are all related to the treatment, storage, or transmission of water, and do not require review, approvals, or permits from the City of La Verne (with the exception of the City of La Verne Fire Department requirements as identified in Table 2-3).

D-1

The City also concurs with the proposed mitigation measures listed for the project. However, the City asks that Metropolitan consider the following requests:

- 1) That Metropolitan, to the best of their ability, attempt to comply with the City's replacement requirements for the heritage oak trees that will be removed with the solar project as listed in La Verne Municipal Code Section 18.78.140.

D-2



- 2) That the documents created to satisfy Mitigation Measure CUL-1 (Photo-documentation to HAER Standards) be made available to City of La Verne Staff to the extent feasible upon written request by the City for historical reports, projects, or displays.

D-3

Thank you again for the opportunity to review the Draft EIR for this project. Should you have any questions about this letter, feel free to contact me at escherer@ci.la-verne.ca.us or 909-596-8706.

Sincerely,



Eric Scherer, AICP
Principal Planner

December 4, 2014

Brenda Marines
Environmental Planning Team
The Metropolitan Water District of Southern California
P. O. Box 54153
Los Angeles, CA 90054-0153

Sent via e-mail 12/5/14

RE: Draft EIR for F. E. Weymouth Treatment Plant Improvement Program

Dear Ms. Marines:

Thank you for the opportunity to comment on the "Draft Environmental Impact Report (DEIR) for the F.E. Weymouth Treatment Plant Improvement Program".

After reviewing the Draft EIR, I am especially concerned regarding the proposed Solar Generation Plant proposed at the southwestern portion of the site (referred to as "site" throughout my letter). This proposal directly affects residences on the north side of Highland Drive and west of Sedalia Avenue.

When I purchased my home in the early 1980's the vacant property along Sedalia and abutting my property to the north was zoned residential (PR4.5D) and identified by the LaVerne General Plan as Low Density Residential. This is still the current zoning and General Plan designation for the property. The property has never been utilized as part of the water treatment plant.

The installation of a solar generation plan in this area is inconsistent with both the zoning and the General Plan.

The following are general comments and comments relating to the Draft Environmental Impact Report.

Aesthetics

The DEIR states that the Solar Generation Project involves installation of a "three megawatt (MS) photo-voltaic system" and a combined total of approximately 170 panels and six electrical inverters that are necessary to convert the direct current power to alternating current. "The solar panel arrays would be mounted **six to nine** feet above the ground on metal poles



E-1



E-2

embedded within concrete foundations (either at or below grade)". The panels would be pole-mounted and consists of a single-axis tracking system so the panels can track the sun's path at a 45 degree angle from east to west on a daily basis.

I could not find any illustrative (other than Figure 3.1-10 Law of Reflectivity) or photos that show the actual type of panels or proposed mounting that will be installed. Unfortunately in reviewing various web sites relating to this type of solar panel system, the size of panels and the mounting of the panels vary in descriptions; anything from single pole installations to dual poles. Some of the installations are much less intrusive than others.

I recently visited two solar panel sites within close proximity to this area. As a note neither of these sites is adjacent to residential. Each site had different mounting techniques (see photos below) but on both sites the very large panels face south.



These panels are located by San Dimas High School and adjacent to the southbound 57 Freeway. There is no residential in the area. The single mount of these panels is bulky and massive.

↑
E-2
↓

These panels are located on a site on the south side of Bonita Avenue in San Dimas by the Sheriff's Station and Forest Service site. Again, there is no residential in the immediate area.



E-2

The panels are facing south in both facilities.

Are the panels proposed at the MWD "site" going to be facing south towards Highland Drive? This is not clear in the DEIR.

In regards to the proposed solar installation on the MWD property located at the northeastern site of the proposed facility (off of Wheeler Avenue) the properties to the north are developed with two-story single family homes. A six foot tall block wall is located along the rear of these properties. In addition "Metropolitan has planted 10 to 12 foot tall conifers spaced approximately 20 feet on center". "As the trees mature, they would act as landscape screening to soften the appearance of the water treatment facility." This appears to be an attempt by MWD to mitigate the visual impact to these properties. Properties to the east of Wheeler Avenue (a four lane roadway) are developed with single-family residences, a park and other non-residential uses which do not face onto the treatment plant.

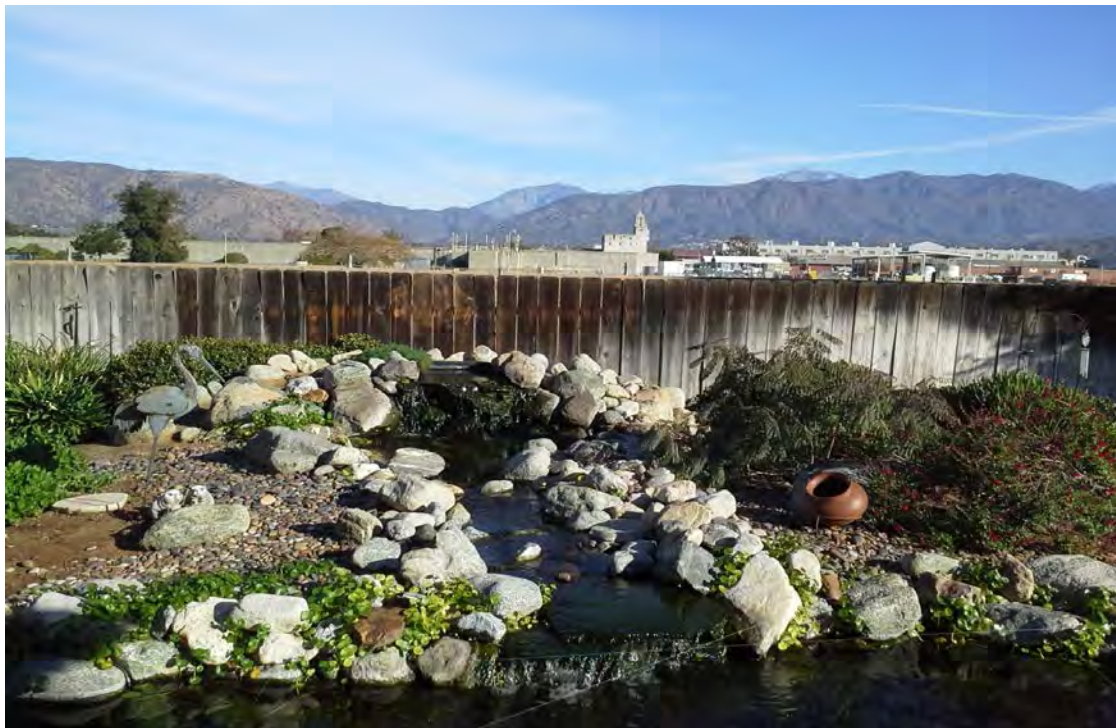
E-3

In contrast, the homes on the north side of Highland Drive directly abut the “site” where solar panels are proposed. The homes were designed with their living rooms facing north with a view of the vacant lot, the mountains, the water treatment plant and in some cases, single-family residences fronting on Sedalia.

Recently a 7’-0” high block wall was completed along the south property line of the “site”. The photos below are taken from my back yard (1281 Highland Drive). As you can see, the 7’-0” wall does not effectively screen any of the plant facilities. Because of the grade change between the properties, the new wall is only a couple of inches higher than the existing 6’-0” high fence.



E-3



The DEIR states (page 3.1-16) “Although the panels would be visible from the surrounding residences, the proposed solar arrays would be consistent with the existing character of the project site which is located entirely within a water treatment facility.” This statement is totally inaccurate. The southwestern site has not been and is not currently developed or used as part of the water treatment facility other than to provide access to properties to the east. More importantly, the current zoning of this vacant property is residential (PR4.5D) and the General Plan is Low Density Residential.

A solar generation plant is not essential to the operation of the Weymouth Water Treatment Plant. It is disingenuous to state that “Although the solar facility would be substantially different in appearance from the existing vacant lot, the overall visual character would not be significantly degraded as the solar panels would be located entirely within an existing water treatment facility. Impacts would be considered less than significant for the southeastern solar facility and less than significant with mitigation for the northwestern facility” (I believe you mean southwestern and northeastern?).

The DEIR notes that: “The solar panel height would range anywhere from six to nine feet. The worst case scenario height of the panels would be nine-feet tall and would be slightly visible

E-3

E-4

E-5

over the existing six foot tall fence” and “The only time during the day that the panels would be at the maximum height of nine feet would be during the morning and evening hours when the sun is low on the horizon. During these times the panels would be tracking the sun and would be perpendicular to the group with the solar arrays absorbing the maximum amount of light possible. When the panels are perpendicular to the ground they would be visible over the six-foot fence; however, panel visibility over the fence would not result in the degradation of the visual character of the area”.

E-5

A solar panel plant is not consistent with the residential “visual character” of the surrounding neighborhoods. In addition there is no landscaping at the southwestern site to provide any screening of the panels along Highland Drive.

Under “Aesthetics”, there are no mitigation measures for those residents adjoining the southwestern site...it is not acceptable to say that the panel visibility over the fence would not result in the degradation of the visual character of the area. It will have a significant effect on the properties on Highland Drive and none are proposed.

E-6

It is Interesting that the only photo from the south is from 5th Street and Esther Avenue where there is a significant grade change and which is screened by heavy landscaping on the MWD property as well as a 6’-0” block wall and a temporary barrier. It is unfortunate that there are no photos in the DEIR that show the southwest site from the back yard of any of the properties on the north side of Highland Drive. I realize that from sidewalks along Highland Drive there will not be a “public view” of the solar panels. Unfortunately the “public” that is most affected by the location of the solar generation plants are the those people whose properties that are immediately adjacent to the proposed installations.

There is no discussion or mention of minimum setbacks for the solar panels from the west and south property lines at this “site”? Are any proposed to help mitigate the visual impact in this area?

E-7

In order to mitigate the visual impact to the residences on the north side of Highland Drive, is there a reason that the solar panels cannot be restricted to a maximum height (at any time) of 6’-0” above grade especially since the DEIR notes that the panels will range from 6-0’ to 9-0’ in height?

E-8

It seems that those of us that do not want to view a field of solar panels will have the responsibility of planting trees or increasing the overall height of the fencing in our yards to effectively screen the solar panels. This is unsatisfactory burden to the property owners on Highland Drive.

E-9

Light and Glare

In discussing light and glare, information in the DEIR notes “For most neighboring residents, this low level glare (from the panels) would be reduced by intervening elements in the immediate view shed, such as vegetative screening created by mature landscape trees, ornamental plantings, walls, and other homes or structures which would obstruct views of the panels.”

E-10

Again, my frustration is that we are the only homes (with the exception of the homes that back up onto the northerly property fronting on Wheeler) that actually abut the vacant property where solar panels will be installed.

There is no information in the project description regarding new “light sources”, with the exception that, “the project would not create new source of substantial lighting beyond what is **currently** required for the safe operation of the plant.” This should be further discussed since it is not clear if the addition of these new/refurbished facilities will require more lighting for the “safe operation of the plant” and what is “safe operation”?

E-11

According to the DEIR, operation of the solar facilities would involve nighttime lighting for security purposes similar to what currently exists for all the buildings throughout the Weymouth Plant. All lighting would be directed away from the neighborhood and other sensitive receptors....Nighttime security lighting would be directed downward to avoid a nuisance to the surrounding areas.

E-12

What is the proposed height of light standards to be located in the solar panel areas and where will they be located? Although lighting may be directed “away” from the neighborhood, if the lights are too high there is spillover which could impact the residential areas. The height and location of lights needs to be identified. (3.1.19). It should be noted that several of the higher lights currently located on the site are visible from adjacent residential properties.

In terms of “glare”, (3.1-22) it notes that “The solar panels would be screened by a block wall at the southwest facility....Only the upper portions of the panels would be visible outside of the plant. The anti-reflective coating would reduce glare and increase the efficient of the facilities.”

E-13

Does this guarantee that there will be no light/glare from the panels? More importantly what direction will these panels face?

Noise and Vibration

Installation of the solar panels would begin by either (a) steel pipes in the ground using a truck-mounted auger; or (2b) installing ground level foundation pads. Installation would require approximately 10 workers over a period of up to fifteen months. (2-13)

When I purchased my home on Highland Drive the vacant property abutting the homes on north Highland Drive was zoned residential. Since MWD purchased this site several years later, there has been only one use on the site, a plant nursery. Since the nursery was removed, the site has remained vacant. It has never been used as part of the MWD operation.

What is frustrating to many of us is that during the past few years the construction projects to the east and north of this site have seemed to be never-ending. On several occasions grading and dirt moving activities have taken place on the “site”. The constant movement of equipment (with the back-up “beep” starting at 7:00 a.m. or in some cases earlier) is an annoyance that goes on all day, along with the continuous construction noise. During the past year or two there have been a few times when delivery of construction material or some other activity has taken place prior to the 7:00 a.m. permitted starting time.

E-14

In regards to vibration, during construction of the 7’-0” wall some sort of machinery (I believe it was a backhoe) was utilized that caused major vibrations. Will the installation of the solar panels utilize machinery which will cause similar types of vibration?

E-15

According to the DEIR, existing noise levels on Highland Drive are 46.6 dBA. An estimated dBA noise level (unmitigated) during maximum construction on Highland Drive is 83.9 dBA. Based on Table 3.8-4 Highland Drive has the highest maximum noise levels of all surrounding locations.

E-16

I am assuming that one of the mitigation measures for noise is the installation of temporary noise barriers/curtains extending 8 feet in height along the south boundary line in the southwestern site. Is this correct?

↑
E-16
↓

General Comments

As I mentioned in my original letter dated January 13, 2014, I think it is commendable that the Metropolitan Water District (MWD) is proposing to rehabilitate, upgrade and renovate “aging” buildings as well as doing seismic upgrades to current buildings. Most of the proposal addresses existing uses and in the long term will improve the operation of the plant. However, proposed installation of two solar generating plants was a surprise.

In this letter I have expressed my concerns regarding the solar generation plant especially in regards to aesthetics as it pertains to the southwestern site. It seems that no real mitigation measures have been proposed to effectively screen this site from the properties on the north side of Highland Drive. I cannot emphasize enough that the solar panels are immediately adjacent to residential properties which is unusual especially because they will be very visible .

If the panels were within the current “developed” site, the impact would be less than significant. However, to locate a generation plant with such close proximity to the backyards of residential property owners is irresponsible. Again, I am not aware of any type of solar “arrays” that are located immediately adjacent to residential properties in this area.

E-17

As you can see from this letter, I am discouraged because even though “economics” are not an “environmental impact”, the properties on the north side of Highland Drive are directly impacted by the installation of a solar generation plant with 6 to 9 foot high solar panels immediately adjacent to the properties. Selling a home that looks out at a field of solar panels is less than desirable to buyers. The impacts to the quality of life for those of us who will be looking at the 6-9 foot high solar panels every day is evident.

In the past, the Weymouth Water Treatment facility has been a good neighbor. However, I am very disappointed in the lack of sensitivity of proposing solar generation plants in such close proximity to residential neighbors especially without providing adequate mitigation measures.

↑
↓

At this time I do not believe the DEIR provides adequate information for the policy makers to certify this EIR without more thoroughly addressing the impacts of the solar generation plants on adjoining residential. More importantly the DEIR does not provide adequate information to make an informative judgment which will ultimately lead to action regarding the final projects that will take place at the Weymouth Water Treatment Plant over the next few years.

↑
E-17
|

If MWD proceeds with the “construction and operation” of a solar generation facility as set forth in the project description, at a minimum the following mitigation measures should be taken to lessen the visual/aesthetic impacts of the proposed solar panels on the southwest parcel:

- Establish a minimum setback along the westerly and southerly property lines
- Reduce the height of solar panels at full extension to a maximum of 6’0” above grade
- Provide some sort of screening along the southernly property line since the 7’-0” high wall does not screen the this site from the properties along the north side of Highland Drive

|
E-18
|

Again, thank you for this opportunity to comment on the Draft Environmental Impact Report.

Donna Butler
 1281 Highland Drive
 La Verne, CA 91750
 909-596-2057
dbutler1281@msn.com

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APPENDIX B

Visual Simulations

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SOURCE: VisionScape Imagery

Weymouth Improvements Program
Figure 1
Photo Simulation Location Map



Existing View



Photo Simulation

SOURCE: VisionScape Imagery

Weymouth Improvements Program

Figure 2
Photo Location 1:
View of the Northeast Solar Facility



Existing View



Photo Simulation



Existing View



Photo Simulation

SOURCE: VisionScape Imagery

Weymouth Improvements Program

Figure 4
Photo Location 3:
View of the Southwest Solar Facility



Existing View



Photo Simulation

SOURCE: VisionScape Imagery

Weymouth Improvements Program

Figure 5
Photo Location 4:
View of the Southwest Solar Facility

End Page