
F.E. Weymouth Water Treatment Plant Improvements Program



Findings of Fact and Statement of Overriding Considerations

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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Southern California**

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Overriding Considerations**

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Improvements Program**

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CHAPTER 1

Introduction

The Metropolitan Water District of Southern California (Metropolitan) has prepared an Environmental Impact Report (EIR) pursuant to the requirements of the California Environmental Quality Act (CEQA) (Public Resource Code [PRC] Section 21080(d)) and the *State CEQA Guidelines* (14 California Code of Regulations Section 15063) evaluating potential environmental effects that may result from the proposed Weymouth Improvements Program. These Findings of Fact (Findings, Chapter 1-5) and Statement of Overriding Considerations (SOC, Chapter 6) have been prepared for the project pursuant to *State CEQA Guidelines* Sections 15091 and 15093. A Mitigation Monitoring and Reporting Program (MMRP, Chapter 7), which includes all mitigation measures required by the proposed project, has been prepared to aid in the implementation of the EIR.

1.1 Certification

In accordance with *State CEQA Guidelines* Section 15090, Metropolitan, as Lead Agency for the project, certifies that:

- (a) The Final EIR for the project has been completed and processed in compliance with the requirements of CEQA;
- (b) The Final EIR was presented to the Metropolitan Board of Directors (Board), and as the decision-making body for Metropolitan, the Board reviewed and considered the information contained in the Final EIR prior to approving the project; and
- (c) The Final EIR reflects Metropolitan's independent judgment and analysis.

With the adoption of these Findings, Metropolitan has exercised independent judgment in accordance with PRC Section 21082.1(c) while retaining its own environmental consultant, i.e., directing the consultant in preparation of the entire EIR as well as reviewing, analyzing, and revising material prepared by the consultant.

These Findings and SOC have been prepared in accordance with CEQA and the *State CEQA Guidelines*. The purpose of these Findings is to satisfy the requirements of PRC Section 21081 and Sections 15090, 15091, 15092, 15093, 15094, and 15097 of the *State CEQA Guidelines*, in connection with the approval of the Weymouth Improvements Program.

Before project approval, a Final EIR must be certified pursuant to Section 15090 of the *State CEQA Guidelines*. Additionally, Metropolitan must make one or more of the following findings in its Findings, accompanied by a brief explanation of the rationale, pursuant to PRC Section

21081 and Section 15091 of the *State CEQA Guidelines*, for each identified potentially significant adverse impact:

- (1) Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final EIR.
- (2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
- (3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

Metropolitan has made one or more of the specific written findings above regarding each potentially significant impact associated with the project. Those Findings are presented here, along with a presentation of facts in support of the findings. The proposed mitigation measures identified as feasible and within Metropolitan's authority to implement for the approved project become express conditions of approval that Metropolitan commits and binds itself to upon project approval. These requirements are referenced in the MMRP, adopted concurrently with these Findings, and will become effective and implemented, as applicable, through project implementation (i.e., pre-construction, construction, post-construction, operation, and routine maintenance).

Section 15092 of the *State CEQA Guidelines* states that after consideration of an EIR, and in conjunction with the Section 15091 findings identified above, the Lead Agency may decide whether or how to approve or carry out the proposed project. The Lead Agency may approve a project with unavoidable significant adverse environmental effects only when it finds that specific economic, legal, social, technological, or other benefits of the proposed project outweigh those effects. Section 15093 of the *State CEQA Guidelines* requires the Lead Agency to document and substantiate any such determination in a "Statement of Overriding Considerations" as a part of the record.

Metropolitan's SOC is presented in Chapter 6. As required by CEQA, Metropolitan expressly finds that the Final EIR for the Weymouth Improvements Program reflects Metropolitan's independent review and judgment. In accordance with the provisions of CEQA and the *State CEQA Guidelines*, Metropolitan adopts these Findings and SOC as part of its certification of the Final EIR. A brief explanation of the rationale for each finding, including a description of project alternatives, is provided in Chapters 4 and 5.

The Final EIR is hereby incorporated by reference into these Findings in its entirety, including the Draft EIR.

1.2 Organization of CEQA Findings of Fact

The content and format of these CEQA Findings are designed to meet the latest CEQA Statutes and Guidelines. For purposes of these findings, the term “avoid” refers to the effectiveness of one or more mitigation measures to reduce an otherwise potentially significant effect to a less-than-significant level. In contrast, the term “substantially lessen” refers to the effectiveness of such measure or measures to reduce the severity of a significant effect, but not to reduce that effect to a level that is less than significant. This document is organized into the following chapters:

Chapter 1, Introduction outlines the organization of this document and identifies the location and custodian of the record of proceedings.

Chapter 2, Project Description describes the location, project overview, project objectives, and the required permits and approvals for the project.

Chapter 3, CEQA Review and Public Outreach describes the steps Metropolitan has undertaken to comply with the *State CEQA Guidelines* as they relate to public input, review, and participation during the preparation of the Draft and Final EIR.

Chapter 4, Environmental Impacts

Less-than-Significant Environmental Impacts with Mitigation provides a summary of potentially significant environmental impacts for which implementation of proposed feasible mitigation measures would avoid or reduce the environmental impacts to less-than-significant levels.

Significant and Unavoidable Environmental Impacts provides a summary of potentially significant and significant environmental impacts for which no feasible mitigation measures are identified, or for which implementation of proposed feasible mitigation measures would not avoid or reduce the environmental effects to less-than-significant levels. This section also provides specific written findings regarding each significant impact associated with the proposed project.

Chapter 5, Project Alternatives provides a summary of the alternatives considered for the proposed project.

Chapter 6, Statement of Overriding Considerations provides a summary of all of the project’s significant unavoidable adverse impacts. In addition, this chapter identifies the project’s substantial benefits that outweigh and override the project’s significant unavoidable impacts, such that the impacts are considered acceptable.

Chapter 7, Mitigation Monitoring and Reporting Program provides a brief discussion of the project’s compliance with the *State CEQA Guidelines* regarding the adoption of a program for reporting and monitoring.

1.3 Record of Proceedings

The environmental documents and other materials (Draft EIR, Final EIR, Findings, SOC, MMRP) are located at the Metropolitan offices: 700 North Alameda Street, Los Angeles, California 90012.

1.4 Legal Effects of Findings

To the extent that these Findings conclude that the proposed mitigation measures outlined in the Final EIR are feasible and have not been modified, superseded or withdrawn, Metropolitan hereby commits to implementing these measures. These Findings, in other words, are not merely informational, but rather constitute a binding set of obligations that will come into effect when Metropolitan adopts a resolution approving the proposed project.

The mitigation measures are referenced in the MMRP (Chapter 7 of this document) adopted concurrently with these findings, and will be implemented, as applicable, through the process of implementing the proposed project elements (i.e., pre-construction, construction, post-construction, operation, and routine maintenance).

CHAPTER 2

Project Description

2.1 Environmental Setting

2.1.1 Existing Setting

The F. E. Weymouth Water Treatment Plant (Weymouth Plant) was originally designed to treat water delivered by the Colorado River Aqueduct (CRA) but since the 1970s has had the capability to treat any blend of CRA water and State Water Project (SWP) water delivered from northern California. The Weymouth Plant typically operates at an annual flow of approximately 250 million gallons per day (mgd) with peak summer flows of approximately 400 mgd. The Weymouth Plant's design capacity is 520 mgd.

Metropolitan is proposing to implement the Weymouth Improvements Program. The proposed project consists of the following elements: Filter Rehabilitation, Solar Generation Project, Chlorine System Upgrades, and Weymouth Improvements Project. The proposed project would upgrade, maintain, and/or construct new facilities at the existing Weymouth Plant to enhance operational reliability and update the overall facility.

2.1.2 Surrounding Land Uses

The Weymouth Plant is located at 700 Moreno Avenue in the City of La Verne, California, approximately 30 miles east of the City of Los Angeles, near the eastern boundary of Los Angeles County. The 135-acre plant is bordered by Wheeler Avenue on the east, Moreno and Sedalia Avenues on the west with primarily residential development beyond these streets, and residential development immediately to the north and south. The proposed project would be constructed entirely within the boundary of the existing Weymouth Plant (see Figure 2-2 of the Draft EIR).

2.2 Project Overview

2.2.1 Filter Rehabilitation

The proposed Filter Rehabilitation project would rehabilitate all 48 filters at the Weymouth Plant. The rehabilitation of filters would include replacing filter media based on optimized size and specifications; replacing the surface wash system with improved flow configurations; replacing the underdrains; upgrading instrumentation and raising and replacing the existing troughs to

accommodate a greater depth of filter media. Filter gullet walls would also be reinforced to improve seismic stability.

The proposed project would also include replacing the existing actuators, guard rails and light posts surrounding the filter cells. New guard rails would be added between the filter basin cells and ladders installed inside the basin cells.

2.2.2 Solar Generation Project

The proposed Solar Generation Project would install a three megawatt (MW) photo-voltaic system at two separate locations (northeast and southwest sites) within the Weymouth Plant. The solar panel arrays would be mounted above the ground on metal poles embedded within concrete foundations (either at- or below-grade). The solar panel systems would be approximately seven feet tall (panel plus foundation). Approximately 170 panels and six electrical inverters would be required to convert the direct current (DC) power to alternating current (AC). The northeast site would be approximately 12 acres in size and the southwest site would be approximately 8 acres in size.

Setbacks from residential neighborhoods would be implemented along both facilities as part of the proposed project. The northwest facility would have a setback of approximately twenty feet along Wheeler Avenue and approximately forty feet from residences along Ancona Street. The proposed setbacks for the southwest solar facility from residences along Highland Drive would range from thirty to forty feet. The westernmost arrays would have a setback of forty feet from residences along Highland Drive due to an existing stormwater catch basin, while the easternmost arrays would have a setback of thirty feet from homes along Highland Drive.

Nighttime security lighting would be approximately twenty feet tall, would be directed downward to avoid a nuisance to the surrounding areas and would be on a timer. Light poles would be similar to those currently within the plant and would be approximately twenty feet. New light poles would be located on access roads and placed as far as feasible from surrounding sensitive receptors.

2.2.3 Chlorine System Upgrades

The Chlorine System Upgrades project is required to improve operational reliability at the Weymouth Plant. The proposed project would install new chemical equipment (e.g., evaporator system, chlorinators, instrumentation) to reliably meet drinking water disinfection requirements. The chlorine building would be expanded to house the new chemical equipment.

The Chlorine System Upgrades project would also include the construction of a chlorine chemical unloading station adjacent to the existing chlorine building. The station would house a chlorine unloading system that would be capable of transferring chlorine from railcars to truck cargo trailers. The chlorine station at the treatment plant would be utilized as a back-up facility in the event that Metropolitan's existing chlorine supply facilities (Chemical Unloading Facility [CUF])

and local vendor supply facility) experience service interruptions. If these facilities are unavailable, chlorine transferring operations would be supported by the Weymouth Plant.

2.2.4 Weymouth Improvements Project

Basin Nos. 5-8 Refurbishment

The Basin Nos. 5-8 Refurbishment project would replace existing components within Basin Nos. 5-8 flocculation and sedimentation sections. Proposed rehabilitation to the existing flocculation section would include replacement of guide gates, baffle walls and paddle wheel boards, flocculator drive shaft assemblage, and associated components (e.g., baffle supports, flocculator bearings and couplings, pillow block assembly, wall sealant); and installation of new ladders. Proposed rehabilitation of the sedimentation section would include: refurbishment of the launder troughs (e.g., steel guides and chains, clarifier drive), sludge rake mechanisms and drive assemblage; seismic upgrades to the basin inlet channel walls; and replacement of existing structural members of the catwalks. The proposed project would also include replacement of the existing gates and actuators, guard rails and light posts surrounding the basins.

Domestic and Fire Water System Improvements

The Domestic and Fire Water System Improvements project would enhance reliability of the domestic and fire water system within the Weymouth Plant. Improvements would include completion of the water service loop, installation of fire hydrants; installation of a surge tank and air compressor near the finished water reservoir; and installation of air release and vacuum valves throughout the plant for surge protection.

Dry Polymer System Upgrades

The Dry Polymer System Upgrades project would remove the outdated single polymer mixing train and replace it with two parallel mixing trains. In addition, the proposed project would replace the polymer feed pumps and make modifications to the Dry Polymer Building.

Oxidation Demonstration Plant Rehabilitation

The Oxidation Demonstration Plant (ODP) is a demonstration-scale test facility that was built to evaluate oxidation processes before implementation of such processes at Metropolitan's other full-scale plants. The facility will continue to be utilized to conduct water quality studies to cost-effectively optimize treatment processes at Metropolitan's full-scale plants and prepare for new regulations. The proposed project would include rehabilitation of the existing chemical storage and feed system, and chemical pumps and piping modifications. Existing ozone generators would be replaced and associated wiring and control features would be installed. Construction and rehabilitation would occur entirely within the existing facility.

Stormwater Management Improvements

The Stormwater Management Improvements project would implement long term engineering improvements throughout the Weymouth Plant to address, enhance, control, and reduce potential

pollutants in stormwater runoff. Metropolitan has not determined specifically what improvements would be implemented. They could include, but are not limited to, erosion control measures such as landscaping and bio-swales; or larger scale treatment facilities, such as detention basins or a stormwater treatment facility to filter sediments and treat pollutants on-site. These facilities would be constructed in the southern and northeastern portion of the Weymouth Plant. In addition, canopies would be installed over outdoor storage areas to prevent potential pollutants from being exposed to rainfall. Stormwater Management Improvements would be made in accordance with 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).

Seismic Upgrades – Water Quality Lab, Engineering Building, Central Stores

The proposed project would implement seismic upgrades to the following three buildings:

Water Quality Lab

The Water Quality Lab Seismic Upgrade project would replace structural members within the existing building frame with diagonal braces that meet current seismic code. In addition, modifications would be made to connections at the building foundations.

Engineering Building

The Engineering Building Seismic Upgrade project would require the construction of new exterior steel frames with concrete foundations, and interior bracing, to provide the building with additional seismic resistance.

Central Stores Warehouse

The Central Stores Warehouse Seismic Upgrade project would include the construction of exterior steel frames with concrete foundations, interior bracing, and new connections between the roofing system and building walls.

Wash Water Pump Station Improvements

The proposed project would improve the recycled wash water flow at the Weymouth Plant. The improvements would include replacing two pumps in the ODP with two new pumps with variable frequency drives (adjustable-speed motor). The improvement project would also include approximately 60 linear feet of 24-inch diameter piping from the ODP pumps to the wash water return line just north of the filters.

2.2.5 Construction Activities

Project construction would involve demolition and removal of existing facilities, site grading and excavation to prepare for new facilities, construction and rehabilitation of structures including structural improvements, piping, finish work, equipment installation, paving and landscaping.

Construction activities would occur only during the daytime, no nighttime construction is proposed. It is anticipated that project construction would not require the entire Weymouth Plant to be shut down for any period of time. Localized shut-downs would be required and would occur during construction of the Filter Rehabilitation and Basin Nos. 5-8 Refurbishment project. The specific facilities would experience a temporary interruption in service that would not impact normal plant operations.

Construction is expected to take approximately four years from 2015 to 2018, though the construction period for each individual project component would be less than two years.

2.3 Project Objectives

The overall objectives of the Weymouth Improvements Program are as follows:

- Upgrade aging infrastructure to ensure safe drinking water for years to come;
- Install new, more-efficient treatment technologies to meet more stringent drinking water standards;
- Increase and maintain operational reliability;
- Enhance features of the treatment plant that protect public safety and the environment;
- Improve stormwater management; and
- Reduce off-site energy demands and lower greenhouse gas emissions.

The need and project objectives for each component of the proposed project are summarized below.

Filter Rehabilitation

- Improve reliability, performance, capacity, and operational efficiency of the Weymouth Plant filtration system by increasing filter robustness at design filtration rates;
- Upgrade aging facilities to ensure effective treatment for years to come; and
- Enhance worker safety standards.

Solar Generation Project

- Improve the reliability of the power supply and reduce power costs at the Weymouth Plant;
- Reduce the carbon emissions at the Weymouth Plant by using renewable energy; and
- Support the State of California's greenhouse gas reduction initiatives (i.e., Assembly Bill [AB] 32).

Chlorine System Upgrades

- Enhance reliability of the existing disinfection system at the Weymouth Plant to maintain water quality standards;
- Improve operational reliability of chlorine deliveries to all of Metropolitan’s treatment facilities by providing a back-up source of chlorine distribution;
- Increase flexibility for chlorine deliveries during an unexpected event or a chlorine facility service interruption; and
- Enhance safety measures at the Weymouth Plant chlorine building.

Weymouth Improvements Project

- Maintain reliable operation and meet current seismic design practices and code requirements;
- Improve stormwater management;
- Maintain capability to perform water quality analysis in compliance with regulations;
- Maintain and enhance worker and industrial safety standards;
- Minimize the risk of future system failures and major rehabilitation work; and,
- Update and modernize existing facilities according to current standards and improve operation reliability to meet current and future water processing demands.

2.4 Discretionary Actions

An EIR is a public document used by a public agency to analyze the potentially significant environmental effects of a proposed project, to identify feasible alternatives, and to disclose possible ways to reduce or avoid such impacts to the physical environment (CCR, Title 14, Section 15121). As an informational document, an EIR does not recommend for or against approval of a project. The main purpose of an EIR is to inform governmental decision makers and the public about the potential environmental impacts of a proposed project. This Final EIR will be used by Metropolitan, as the Lead Agency under CEQA, and Responsible Agencies in making decisions with regard to the construction and operation of the proposed project. Metropolitan and these Responsible Agencies would use the analysis contained within this Final EIR to support the following regulatory permits or approvals (Table 2-1).

**TABLE 2-1
 DISCRETIONARY PERMITS POTENTIALLY REQUIRED**

Agency	Permits and Authorizations
Environmental Protection Agency	<ul style="list-style-type: none"> • Update Risk Management Plan (RMP) • Chlorine cargo tank filling
SWRCB Division of Drinking Water	<ul style="list-style-type: none"> • Modification to Water Supply Permit

Agency	Permits and Authorizations
South Coast Air Quality Management District	<ul style="list-style-type: none"> • Permit to Operate
Los Angeles County Fire Department (Certified Unified Program Agency, CUPA)	<ul style="list-style-type: none"> • Update Hazardous Materials Inventory • Update CalARP RMP • Chlorine cargo tank filing
City of La Verne Fire Department	<ul style="list-style-type: none"> • Update Hazardous Materials Inventory • Plancheck, Update Fire Code Occupancy Permit • Review of Fire Sprinkler and Alarm System (per Ordinance 869)
Regional Water Quality Control Board	<ul style="list-style-type: none"> • Construction General Permit Stormwater Pollution Prevention Plan (SWPPP)
City of La Verne*	<ul style="list-style-type: none"> • Construction Permit
City of La Verne*	<ul style="list-style-type: none"> • Building and Grading Permits, Tree Removal

* California Government Code Section 53091 exempts Metropolitan, as a regional public water purveyor and utility, from local planning ordinances and local building codes. At the Weymouth Plant this exemption has been interpreted to pertain only to activities at the plant site directly related to the treatment, storage, or transmission of drinking water.

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CHAPTER 3

CEQA Review and Public Outreach

Metropolitan has complied with CEQA and the *State CEQA Guidelines* during the preparation of the EIR for the proposed project. In accordance with Section 15082 of the *State CEQA Guidelines*, an NOP was circulated to local, State, and federal agencies and to other interested parties on December 19, 2013. The 30-day review period was extended an additional 30 days ending on February 14, 2014. Copies of the NOP were made available for local review at the Los Angeles County Clerk/Recorders Office and the Metropolitan web site: www.mwdh2o.com. The NOP was also submitted to the California Office of Planning and Research, State Clearinghouse to solicit participation from State agencies in determining the scope of the EIR. A public scoping meeting was held on February 26, 2014 at the City of La Verne Community Center.

In response to the NOP, written comment letters were received from the following organizations: Native American Heritage Commission, California Department of Transportation District 7, South Coast Air Quality Management District, City of La Verne, and stakeholders in the City of La Verne. The comment letters are included in Appendix A of the Draft EIR.

The Draft EIR was circulated for public review and comment on October 21, 2014, initiating a 45-day public review period pursuant to CEQA and its implementing guidelines. The document and Notice of Completion (NOC) were distributed to the California Office of Planning and Research, State Clearinghouse. Relevant agencies also received copies of the document. A Notice of Availability (NOA) was distributed to interested parties, adjacent property owners and residents, and advertised in the local newspaper, which provided information for where the documents could be viewed and how comments could be submitted to Metropolitan. The 45-day review period ended on December 6, 2014.

During the public review period, copies of the Draft EIR and technical appendices were made available at the La Verne Public Library (3640 D Street, La Verne, CA 91750) and San Dimas Public Library (145 North Walnut Avenue, San Dimas, CA 91773), and were posted on Metropolitan's website at www.mwdh2o.com.

A Final EIR has been completed and includes written comments on the Draft EIR received by mail and electronic mail, written responses to the written comments, and minor changes to the Draft EIR.

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CHAPTER 4

Environmental Impacts

4.1 Less-than-significant Environmental Impacts with Mitigation

Pursuant to *State CEQA Guidelines* Section 15091, the following are impacts of the proposed project for which mitigation measures were proposed in the Draft EIR. These measures will avoid or reduce the following potentially significant environmental impacts to a less-than-significant level.

4.1.1 Project-Level Impacts

Aesthetics

Impact 3.1-1: The Final EIR concludes in Impact 3.1-1 that the operation of the northeast solar facility could substantially degrade the existing visual character or quality of the site and its surroundings. (Draft EIR page 3.4-8)

Mitigation Measure AES-1: Prior to installation of the solar panels for the northeastern Solar Generation Project, Metropolitan shall verify that vegetative barriers installed along the perimeter fences of the Weymouth Plant adjacent to the solar facility shall be sufficient to screen views of the solar panel arrays from Wheeler Avenue and Pelota Park. Metropolitan shall replace and actively maintain any vegetation that has died or provide alternative screening options at a similar height.

With Mitigation the Environmental Effects are Found to be:

Significant Not Significant

Finding(s) per *State CEQA Guidelines* Section 15091:

- Changes or alterations have been required in, or incorporated into, the project which avoid or “substantially lessen” the significant environmental effect as identified in the Final EIR. (Subdivision (a)(1).)
- Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency. (Subdivision (a)(2).)

- Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR. (Subdivision (a)(3).) See Chapter 6, Statement of Overriding Considerations.

Rationale/Supporting Explanation: When the panels are perpendicular to the ground, they would be visible over the seven-foot fence; however, panel visibility over the fence would not result in the degradation of the visual character of the area. 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. Due to the lack of screening, the northeastern solar facility would be visible from Wheeler Avenue and Pelota Park. However, the implementation of **Mitigation Measure AES-1** would require maintaining vegetation along the eastern perimeter fence of the plant to screen public views. With the visual screening, impacts associated with the northeast solar facility would be considered less than significant. (Draft EIR page 3.1-16)

Cultural Resources

Impact 3.4-1: The Final EIR concludes in Impact 3.4-1 that project construction could cause a substantial adverse change in the significance of a historical resource as defined in *State CEQA Guidelines* Section 15064.5. (Draft EIR page 3.4-11)

Mitigation Measure CUL-1: Photo-documentation to HAER Standards:

- (a) **Prior to construction**, Metropolitan will document the history of the resource's technology at HAER Standards Level 2 (compilation of historical plans, as-built drawings, photographs, and contractor specifications; for further detail see www.cr.nps.gov/htp). Prior to the loss of original material (whether visible from the surface or representing character-defining engineered aspects of the Weymouth plant) will be taken to depict their visual setting and existing condition, using large-format photography (4 x 5 inch or greater). Photo-documentation will be guided by a qualified architectural historian.
- (b) **During and after construction**, photographs will be taken to depict the demolition, new construction, and completed work of the project components, using 35-mm photography or larger.
- (c) **After construction**, the collected documentation will be combined into a HAER-like documentation package (using HAER documentation and formatting) and will be maintained at Metropolitan's Headquarters. This documentation effort will be guided by a qualified architectural historian and documentation will be available for research as appropriate, with consideration given to the security of Metropolitan's facilities.

Mitigation Measure CUL-2: On-site Exhibit or Display:

- (a) An on-site interpretative display will be prepared to illustrate the evolution of the design change in filter cells technology over time. The display will depict the original filter cell

- design, construction, and modifications made as technology changed between 1941 to present.
- (b) An example of each distinct actuator type (those south of Filter Building No. 2 and south of Basins 5 to 8) of the period of significance will be retained for display on the grounds of the Weymouth Plant.

With Mitigation the Environmental Effects are Found to be:

- Significant Not Significant

Finding(s) per *State CEQA Guidelines* Section 15091:

- Changes or alterations have been required in, or incorporated into, the project which avoid or “substantially lessen” the significant environmental effect as identified in the final EIR. (Subdivision (a)(1).)
- Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency. (Subdivision (a)(2).)
- Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR. (Subdivision (a)(3).) See Chapter 6, Statement of Overriding Considerations.

Rationale/Supporting Explanation:

Proposed changes as part of the Filter Rehabilitation and Basin Nos. 5 to 8 Refurbishment have the potential to have a lasting and significant adverse change to the significance of the historic resource. Within the historic portion of the Weymouth Plant, design/engineering is considered a contributing element to the significance of the resource. It is these character-defining features and design elements that contribute to the significance of the property as a highly technical facility. Their removal or alteration potentially constitutes a substantial adverse change in the significance of the historical resource unless mitigated. Impacts can be reduced to a less than significant level with application of the *Secretary’s Rehabilitation Standards* and adherence to Mitigation Measures CUL-1 and CUL-2. (Draft EIR page 3.4-24)

4.2 Significant and Unavoidable Environmental Impacts

Pursuant to *State CEQA Guidelines* Section 15091, the following project impacts are significant environmental effects for which feasible mitigation measures are not available to avoid or reduce the potentially significant environmental effects to below a level of significance. The adverse impacts would remain significant and unavoidable.

4.2.1 Project-Level Impacts

Air Quality

Impact 3.2-2: The Final EIR concludes in Impact 3.2-2 that construction of the proposed project would violate air quality standards or contribute substantially to an existing or projected air quality violation. (Draft EIR page 3.2-18)

Mitigation Measure 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.

Mitigation Measure AQ-2: All off-road diesel-powered construction equipment greater than 50 horsepower (hp) shall meet or exceed Environmental Protection Agency Tier 4 emission standards, where available. 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.

With Mitigation the Environmental Effects are Found to be:

Significant Not Significant

Finding(s) per *State CEQA Guidelines* Section 15091:

- Changes or alterations have been required in, or incorporated into, the project which avoid or "substantially lessen" the significant environmental effect as identified in the final EIR. (Subdivision [a][1].)
- Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency. (Subdivision [a][2].)
- Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR. (Subdivision [a][3].) See Chapter 6, Statement of Overriding Considerations.

Rationale/Supporting Explanation: Daily construction emissions associated with the proposed project would exceed the SCAQMD localized thresholds for nitric oxide (NO_x). Mitigation Measures AQ-1 and AQ-2, require that 2010 and newer diesel haul trucks and all off-road construction equipment be 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 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. No additional feasible mitigation measures are available that would reduce air quality impacts to a level of less than significant.

The project's maximum daily NO_x emissions would 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 considered significant and unavoidable. (Draft EIR page 3.2-18)

Noise

Impact 3.8-1: The Final EIR concludes in Impact 3.8-1 that construction of the proposed project could substantially generate noise levels in excess of standards established in applicable plans or noise ordinances. (Draft EIR page 3.8-11)

Mitigation Measure NOISE-1: Prior to any significant noise-generating work (i.e., excavation, grading, demolishing) to be performed for the Solar Generation Project, Filter Rehabilitation, Dry Polymer System Upgrades, ODP Rehabilitation and Seismic Upgrades to the Water Quality Lab, temporary noise barriers/curtains extending at least eight feet in height shall be erected around the perimeter of the active construction area or project site boundary such that the off-site receptor has no view of the construction effort. The noise barrier/curtain would be designed to achieve a reduction of 5 dBA or greater. The surface of the noise barrier (or sound wall, acoustic blanket) would present a solid face from top to bottom without any openings or cutouts.

Mitigation Measure NOISE-2: During construction, the following measures shall be implemented, as necessary, to ensure compliance with applicable construction noise ordinances:

- All construction equipment, fixed or mobile, shall be outfitted with properly operating and maintained exhaust and intake mufflers, consistent with manufacturers' standards.
- Impact tools (e.g., jack hammers, etc.) used for construction shall be hydraulically or electrically powered when feasible to avoid noise associated with compressed air exhaust from pneumatically powered tools. When use of pneumatic tools is necessary, an exhaust muffler on the compressed air exhaust shall be used. External jackets on the tools themselves shall be used when feasible. Quieter procedures, such as use of drills rather than impact tools, shall be used whenever feasible.
- Stationary noise sources shall be located as far from adjacent receptors as possible.

Mitigation Measure NOISE-3: Haul routes shall be restricted to arterial roads and shall not be designated through residential areas whenever feasible.

With Mitigation the Environmental Effects are Found to be:

- Significant Not Significant

Finding(s) per *State CEQA Guidelines* Section 15091:

- Changes or alterations have been required in, or incorporated into, the project which avoid or “substantially lessen” the significant environmental effect as identified in the final EIR. (Subdivision [a][1].)
- Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency. (Subdivision [a][2].)
- Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR. (Subdivision [a][3].) See Chapter 6, Statement of Overriding Considerations.

Rationale/Supporting Explanation: Construction of the proposed project would potentially expose persons to or generate noise levels in excess of standards. Construction activities would produce ambient noise that exceeds established standards by more than 5 dBA. Implementation of Mitigation Measures NOISE-1 through NOISE-3 will not reduce the impacts of the Filter Rehabilitation project, Solar Generation Project, Dry Polymer System Upgrades project, ODP Rehabilitation project, and Seismic Upgrade to the Water Quality Lab to below a level of significance due to the close proximity of sensitive receptors to construction activity. No additional feasible mitigation measures are available that would reduce noise impacts to a level of less than significant during construction. Impacts would be considered significant and unavoidable. (Draft EIR page 3.8-11)

4.2.2 Cumulative Impacts

Air Quality

Chapter 4: The Final EIR concludes in Chapter 4 that concurrent construction of the project with other projects in the air basin could exceed significance thresholds established by SCAQMD for pollutants that are already in non-attainment of federal standards. (Draft EIR page4-4)

Mitigation Measure 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.

Mitigation Measure AQ-2: All off-road diesel-powered construction equipment greater than 50 horsepower (hp) shall meet or exceed Environmental Protection Agency Tier 4 emission standards, where available. 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.

With Mitigation the Environmental Effects are Found to be:

Significant Not Significant

Finding(s) per *State CEQA Guidelines* Section 15091:

- Changes or alterations have been required in, or incorporated into, the project which avoid or "substantially lessen" the significant environmental effect as identified in the final EIR. (Subdivision [a][1].)
- Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency. (Subdivision [a][2].)
- Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR. (Subdivision [a][3].) See Chapter 6, Statement of Overriding Considerations.

Rationale/Supporting Explanation: Construction of the proposed project would generate significant and unavoidable short-term emissions of criteria pollutants from the use of heavy-duty construction equipment. As the SCAB is currently classified as a state nonattainment area for ozone, NO_xPM₁₀, and PM_{2.5}, cumulative development consisting of the proposed project along with other reasonably foreseeable future projects in the SCAB as a whole could violate an air quality standard or contribute to an existing or projected air quality violation. 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 maximum daily NO_x emissions generated by the project would be reduced to 107 pounds per day with mitigation. No additional feasible mitigation measures are available that would further reduce cumulative air quality impacts to a level of less than significant. Therefore, as discussed in Section 3.2, Air Quality of the Draft EIR, the project would exceed SCAQMD significance thresholds for criteria air pollutants, resulting in significant and unavoidable air quality impacts during construction.

Noise

Chapter 4: The Final EIR concludes in Chapter 4 that concurrent construction of the project with other projects within the plant could exceed established noise significance thresholds established by the County of Los Angeles. (Draft EIR page 4-8)

Mitigation Measure NOISE-1: Prior to any significant noise-generating work (i.e., excavation, grading, demolishing) to be performed for the Solar Generation Project, Filter Rehabilitation, Dry Polymer System Upgrades, ODP Rehabilitation and Seismic Upgrades to the Water Quality Lab, temporary noise barriers/curtains extending at least eight feet in height shall be erected around the perimeter of the active construction area or project site boundary such that the off-site receptor has no view of the construction effort. The noise barrier/curtain would be designed to achieve a reduction of 5 dBA or greater. The surface of the noise barrier (or sound wall, acoustic blanket) would present a solid face from top to bottom without any openings or cutouts.

Mitigation Measure NOISE-2: During construction, the following measures shall be implemented, as necessary, to ensure compliance with applicable construction noise ordinances:

- All construction equipment, fixed or mobile, shall be outfitted with properly operating and maintained exhaust and intake mufflers, consistent with manufacturers' standards.
- Impact tools (e.g., jack hammers, etc.) used for construction shall be hydraulically or electrically powered when feasible to avoid noise associated with compressed air exhaust from pneumatically powered tools. When use of pneumatic tools is necessary, an exhaust muffler on the compressed air exhaust shall be used. External jackets on the tools themselves shall be used when feasible. Quieter procedures, such as use of drills rather than impact tools, shall be used whenever feasible.
- Stationary noise sources shall be located as far from adjacent receptors as possible.

Mitigation Measure NOISE-3: Haul routes shall be restricted to arterial roads and shall not be designated through residential areas whenever feasible.

With Mitigation the Environmental Effects are Found to be:

Significant Not Significant

Finding(s) per *State CEQA Guidelines* Section 15091:

- Changes or alterations have been required in, or incorporated into, the project which avoid or "substantially lessen" the significant environmental effect as identified in the final EIR. (Subdivision [a][1].)
- Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency. (Subdivision [a][2].)
- Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR. (Subdivision [a][3].) See Chapter 6, Statement of Overriding Considerations.

Rationale/Supporting Explanation: Construction of the proposed project would generate significant and unavoidable short-term noise from the use of heavy-duty construction equipment. Implementation of Mitigation Measures NOISE-1 through NOISE-3 would help reduce impacts. However, for the Filter Rehabilitation project, Solar Generation Project, Dry Polymer System Upgrades project, ODP Rehabilitation project, and Seismic Upgrade to the Water Quality Lab, implementation of mitigation measures would not reduce noise levels at the nearest sensitive receptors to below County thresholds. As a result, concurrent construction of the proposed project with other projects, including past projects within the Weymouth Plant, would exceed the County noise significance thresholds and generally continue the impacts to nuisance ambient noise in the immediate vicinity of the plant. This impact would result in a cumulatively considerable noise impact during construction. No additional feasible mitigation measures are available that would reduce cumulative impacts to a level of less than significant.

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CHAPTER 5

Project Alternatives

Because the proposed project would result in unavoidable, significant environmental effects, as stated in Chapter 4 of this document, Metropolitan must consider the feasibility of any environmentally superior alternatives to the proposed project. Metropolitan must evaluate whether one or more of these alternatives could avoid or substantially lessen the proposed project's unavoidable, significant environmental effects. (*Citizens for Quality Growth v. City of Mount Shasta* [1988] 198 Cal.App.3d 433, 443-445 [243 Cal.Rptr. 727]; see also PRC Section 21002.)

In preparing and adopting Findings, a Lead Agency need not necessarily address the feasibility of both mitigation measures and environmentally superior alternatives when contemplating approval of a proposed project with significant impacts. Where a significant impact can be mitigated to an acceptable level solely by the adoption of mitigation measures, the agency, in drafting its Findings, has no obligation to consider the feasibility of environmentally superior alternatives, even if their impacts would be less severe than those of the proposed project as mitigated. (*Laurel Hills Homeowners Association v. City Council* [1978] 83 Cal.App.3d 515,521 [147 Cal.Rptr. 842]; see also *Kings County Farm Bureau v. City of Hanford* [1990] 221 Cal.App.3d 692, 730-731 [270 Cal.Rptr. 650]; and *Laurel Heights Improvement Association v. Regents of the University of California* [1988] 47 Cal.3d 376, 400-403 [253 Cal.Rptr. 426].) Accordingly, in adopting Findings concerning project alternatives, Metropolitan considers only those environmental impacts that, for the proposed project, are significant and cannot be avoided through mitigation.

These Findings examine the two project alternatives to the extent they lessen or avoid the proposed project's significant environmental effects. Metropolitan need not consider the alternatives with respect to the proposed project's environmental impacts that are not significant or are avoided through mitigation. The objectives of implementing the proposed project are listed in Section 2.3 Project Objectives, of this report.

5.1 No Project Alternative

According to Section 15126.6(e) of the *State CEQA Guidelines*, discussion of the No Project Alternative must include a description of existing conditions and reasonably foreseeable future conditions that would exist if the project were not approved. The No Project Alternative does not meet the overall project objectives, or the objectives of the individual project components, as stated above. Aging infrastructure would not be upgraded and new more efficient treatment technologies would not be installed to meet more stringent drinking water standards. Aging machinery and infrastructure would eventually fail requiring unplanned plant shutdowns. Without the solar project, reductions to off-site energy demands and decrease in greenhouse gas emissions would not occur. In addition, current seismic standards may not be met without the

proposed seismic upgrades. Chlorine delivery flexibility in case of an unexpected event would not be available and stormwater management would not be improved on-site.

Under the No Project Alternative, the impacts identified in Chapters 3 and 4 of the Draft EIR that are associated with construction and operation of the proposed project, including all significant and unavoidable impacts, would be avoided. The No Project Alternative would have fewer impacts than the proposed project due to the lack of construction activities at the site (Draft EIR page 6-5)

5.2 Alternative 2: No Solar Project Alternative

Alternative 2 would contain all of the components of the proposed project, except the construction of the solar generation facilities. The No Solar Project Alternative would not meet any of the Solar Generation Project objectives or the overall Weymouth Improvements Program objective to reduce off-site energy demands. However, all other project-specific objectives would be met. All of the other proposed projects (with the exception of the solar generation facilities) would still be constructed on-site; upgrades to aging infrastructure and installation of more efficient treatment technologies to ensure safe drinking water and compliance with more stringent drinking water standards would occur. Stormwater management would be improved and features of the treatment plant would be enhanced to protect public safety and the environment. With the removal of the Solar Generation Project, this alternative would not help reduce off-site energy demands and lower greenhouse gas emissions.

The No Solar Project Alternative would not avoid any of the significant and unavoidable impacts of the proposed project (air quality and noise). Impacts to aesthetic resources considered less than significant with mitigation would be reduced with the removal of the solar facility along the northeast corner of the Weymouth Plant to less than significant and no mitigation would be required. Although some of the other impacts may be slightly reduced due to the removal of the Solar Generation Project, impact determinations would remain similar to those of the proposed project described in the Draft EIR. (Draft EIR page 6-8)

CHAPTER 6

Statement of Overriding Considerations

When a proposed project results in significant, unavoidable adverse impacts, CEQA requires the decision-making body of the Lead Agency to weigh the benefit of the proposed project against such environmental impacts in determining whether or not to approve the proposed project (*State CEQA Guidelines* Section 15043). In making this determination the Lead Agency is guided by the *State CEQA Guidelines* Section 15093, which states:

- CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered “acceptable.”
- When the Lead Agency approves a project which will result in the occurrence of significant effects which are identified in the Final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the Final EIR and/or other information in the record. The Statement of Overriding Considerations shall be supported by substantial evidence in the record.
- If an agency makes a Statement of Overriding Considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

In addition, PRC Section 21081(b) requires that when a public agency finds that economic, legal, social, technological or other reasons make infeasible the mitigation measures or alternatives identified in the EIR and the project thereby continues to have significant unavoidable adverse impacts, the public agency must also find that specific overriding economic, legal, social, technological or other benefits of the project outweigh those significant unavoidable impacts of the project.

The Final EIR identified two alternatives to the proposed project: the No Project Alternative and the No Solar Project Alternative. These alternatives were evaluated to the extent to which they met the project objectives, while avoiding or substantially lessening any significant adverse impacts of the proposed project.

The reasons detailed in the Findings and the Draft EIR (Chapter 6 of the Draft EIR) indicate only one of the alternatives would be considered environmentally superior to the proposed project (i.e., the No Solar Project Alternative). The sections below explain the overriding considerations Metropolitan relied on in selecting the proposed project rather than the environmentally superior alternative.

6.1 Significant Unavoidable Impacts

6.1.1 Air Quality

Based on the information and analysis set forth in the Final EIR and the record of proceedings, construction of the proposed project would result in temporary significant impacts related to air quality. Construction of the proposed project would generate significant and unavoidable short-term emissions of criteria pollutants from the use of heavy-duty construction equipment. Implementation of Mitigation Measure AQ-1 and AQ-2 would reduce the NO_x emissions from off-road construction equipment exhaust by approximately 90 percent. The maximum daily NO_x emissions generated by the project would be reduced to 107 pounds per day with mitigation. However, the project nevertheless would exceed SCAQMD significance thresholds for criteria air pollutants, resulting in significant and unavoidable adverse air quality impacts during construction. Impacts would be considered significant and unavoidable.

6.1.2 Noise

Construction activities of the proposed project would potentially expose persons to or generate noise levels in excess of standards resulting in temporary significant impacts related to noise. Construction activities would produce ambient noise that exceeds established standards by more than five dBA. Implementation of Mitigation Measures NOISE-1 through NOISE-3 would not reduce the impacts of certain project components (Filter Rehabilitation project, Solar Generation Project, Dry Polymer System Upgrades project, ODP Rehabilitation project, and Seismic Upgrade to the Water Quality Lab) to below a level of significance due to the close proximity of sensitive receptors to construction activity. No additional feasible mitigation measures are available that would reduce noise impacts during construction to a level of less than significant. Impacts would be considered significant and unavoidable.

6.1.3 Cumulative Air Quality-Construction Impacts

Construction of the proposed project would generate significant and unavoidable short-term emissions of criteria pollutants from the use of heavy-duty construction equipment. 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 maximum daily NO_x emissions generated by the project would be reduced to 107 pounds per day with mitigation. No additional feasible mitigation measures are available that would further reduce cumulative air quality impacts to a level of less than significant. Therefore, the project would exceed SCAQMD

significance thresholds for criteria air pollutants during construction, resulting in significant and unavoidable cumulatively considerable air quality impacts.

6.1.4 Cumulative Noise-Construction Impacts

Construction of the proposed project would generate significant and unavoidable short-term noise from the use of heavy-duty construction equipment. Implementation of Mitigation Measures NOISE-1 through NOISE-3 would help reduce impacts. However, for the Filter Rehabilitation project, Solar Generation Project, Dry Polymer System Upgrades project, ODP Rehabilitation project, and Seismic Upgrade to the Water Quality Lab, implementation of mitigation measures would not reduce noise levels at the nearest sensitive receptors to below County thresholds. As a result, concurrent construction of the proposed project with other projects (including past projects within the Weymouth Plant), would exceed the County noise significance thresholds and generally continue the impacts to nuisance ambient noise in the immediate vicinity of the plant. No additional feasible mitigation measures are available that would reduce cumulative impacts to a level of less than significant. Therefore, the proposed project would result in a cumulatively considerable noise impact during construction.

6.2 Project Benefits

Metropolitan has (i) independently reviewed the information in the Final EIR and the record of proceedings; (ii) made a reasonable and good faith effort to eliminate or reduce the impacts resulting from the project to the extent feasible by adopting the mitigation measures identified in the EIR; and (iii) balanced the project's benefits against the project's significant unavoidable air quality and noise impacts. Metropolitan finds that the project's benefits outweigh the project's temporary significant unavoidable impacts. Metropolitan finds that the following benefits are overriding considerations that warrant approval of the project notwithstanding the project's significant unavoidable impacts to air quality and noise. Substantial evidence supports the various benefits as discussed below.

6.2.1 Filter Rehabilitation

The Weymouth Plant currently provides potable water treatment via chlorination, coagulation, flocculation, sedimentation, filtration, and disinfection. The filtration process includes 48 filters that vary in age from 50 to over 70 years old. While the filters were considered state-of-the-art technology at the time of their construction, they were designed to meet much less stringent performance and water quality standards than are currently in place. The filters are operating at less than optimal flow rates, which lower the effectiveness of the treatment and affect the resulting water quality. The proposed Filter Rehabilitation project would rehabilitate all 48 existing filters to allow for increased flow rates and improve effectiveness of the filtration process to ensure continued compliance with the Safe Drinking Water Act. (Draft EIR page 2-3)

6.2.2 Solar Generation Project

The proposed project would upgrade and/or construct new facilities within the existing Weymouth Plant to accommodate the plant's maximum operating capacity and update the overall facility. The main source of power at the Weymouth Plant is currently provided through Southern California Edison (SCE). Construction of the Solar Generation Project would allow for a secondary source of power to offset and reduce the amount of power purchased from SCE.

The Weymouth Plant consumes an average of approximately 10,200 megawatt-hours per year of energy for operational purposes (based on 2010 and 2013 data). With the addition of the Oxidation Retrofit Program (ORP), currently under construction, it is anticipated that energy usage will increase by approximately 40 percent, resulting in an energy usage of 14,227 megawatt-hours per year starting in 2016. The 3-MW Solar Generation Project would reduce on-site energy usage by an estimated 7,700 megawatt-hours per year. The addition of the Solar Generation Project would also assist in the reduction of the plant's estimated operational emissions of CO₂e by 1,818 metric tons per year. (Draft EIR page 3.5-10)

A critical benefit of the proposed 3-MW Solar Generation Project includes the opportunity to meet approximately 50 percent of the energy needs of the existing facilities at the Weymouth Plant. In addition, this would result in an approximate 49 percent reduction in GHG emissions from the Weymouth Plant. These reductions are consistent with State and local goals to substantially reduce regional GHG emissions through the use of renewable energy. (Draft EIR page 3.5-11)

6.2.3 Weymouth Improvements Project

The Weymouth Plant has been in continuous operation for over 70 years and improvements are required from time to time to bring the facility up to current standards. The Weymouth Improvements Project includes upgrades and maintenance projects needed to maintain and improve the treatment facilities to enhance overall plant reliability while meeting current and future water supply demands and increasingly stringent water quality standards. (Draft EIR page 2-5)

Dry Polymer System Upgrades

The Weymouth Plant currently has one polymer mixing train, which requires that cationic and anionic polymers be prepared in separate batches. The proposed Dry Polymer System Upgrade project would remove the outdated single polymer mixing train and replace it with a more updated system, which uses two parallel mixing trains. Further, the proposed project would replace the heating, ventilation and air conditioning air duct system within the building. These upgrades and modifications would assist in the updating and modernization of existing facilities to meet more stringent drinking water standards and increase and maintain operational reliability. (Draft EIR page 2-9)

Oxidation Demonstration Plant Rehabilitation

The Oxidation Demonstration Plant (ODP) is a demonstration-scale test facility that was built to evaluate oxidation processes before implementation of such processes at Metropolitan's other full-scale plants. The facility will continue to be utilized to conduct water quality studies to cost-effectively optimize treatment processes at Metropolitan's full-scale plants and prepare for new regulations. The proposed project would include rehabilitation of the existing chemical storage and feed system, and chemical pumps and piping modifications. Existing ozone generators would be replaced and associated wiring and control features would be installed. Construction and rehabilitation would occur entirely within the existing facility. These upgrades and modifications would help maintain the plant's capability to perform water quality analysis in compliance with regulations, assist in the updating and modernization of existing facilities according to current standards, and improve operation reliability to meet current and future water processing demands. (Draft EIR page 2-11)

Seismic Upgrades – Water Quality Lab

The proposed project would implement seismic upgrades to three buildings on-site, including the Water Quality Lab. The Water Quality Lab Seismic Upgrade project would replace structural members within the existing building frame with diagonal braces that meet current seismic code and would make modification to connections at the building foundations. These improvements would enhance worker safety and maintain industrial safety standards. (Draft EIR page 2-11)

6.3 Statement of Overriding Considerations

After balancing the specific economic, legal, social, technological, and other benefits of the proposed project, Metropolitan has determined that the significant and unavoidable adverse environmental impacts identified in Section 6.1 may be considered "acceptable" due to the specific considerations listed in Section 6.2 which outweigh the significant and unavoidable adverse environmental impacts of the proposed project.

Metropolitan has considered information contained in the Final EIR, as well as the public testimony and record of proceedings in which the proposed project was considered. In addition, Metropolitan commits to the proposed mitigation measures and acknowledges that project benefits outweigh the few significant and unavoidable adverse impacts (all temporary during construction activities) identified in Section 6.1 of this document. In making this determination and commitment, Metropolitan incorporates by reference the Findings (Chapters 1 through 5 of this document) and the proposed MMRP (Chapter 7), as well as all of the supporting evidence cited therein and in the record of proceedings and administrative record.

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CHAPTER 7

Mitigation Monitoring and Reporting Program

The Mitigation Monitoring and Reporting Program (MMRP) for the proposed project has been prepared in accordance with PRC Section 21081.6 and *State CEQA Guidelines* Section 15091(d). Metropolitan will use this MMRP to track compliance with the project mitigation measures. Metropolitan's Board of Directors will consider the MMRP during the certification hearing for the Final EIR. The final MMRP will incorporate all mitigation measures adopted for the proposed project.

This MMRP summarizes potentially significant impacts and mitigation commitments identified in the Weymouth Improvements Program Final EIR. **Table 7-1** provides the MMRP which includes all mitigation measures, monitoring process, monitoring timing, and responsible persons/agency for implementation. Impacts and mitigation measures are presented in the same order as in the Final EIR. The columns in the table provide the following information:

- **Mitigation Measures:** The action(s) that will be taken to reduce the impact to a less-than-significant level.
- **Monitoring Process:** This column outlines the appropriate steps to implement and verify compliance with the mitigation measures.
- **Monitoring Timing:** This column indicates the general schedule for conducting each monitoring task, either prior to construction, during construction, and/or after construction.
- **Responsible Person(s):** This column lists the agency responsible for ensuring implementation of the mitigation measure. Metropolitan or one of the Responsible Agencies will assume responsibility for all monitoring and reporting actions.

**TABLE 7-1
 MITIGATION MONITORING AND REPORTING PROGRAM – WEYMOUTH IMPROVEMENTS PROGRAM**

Mitigation Measures	Monitoring Process	Monitoring Timing	Responsible Person(s)
3.1: Aesthetics			
<p>Mitigation Measure AES-1: Prior to installation of the solar panels for the northern Solar Generation Project, Metropolitan shall verify that vegetative barriers installed along the perimeter fences of the Weymouth Plant adjacent to the solar facility shall be sufficient to screen views of the solar panel arrays from Wheeler Avenue and Pelota Park. Metropolitan shall replace and actively maintain any vegetation that has died or provide alternative screening options at a similar height.</p>	Site Inspection	During Construction, Post-Construction	Metropolitan
3.2: Air Quality			
<p>Mitigation Measure 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.</p>	Equipment Inspection	During Construction	Metropolitan
<p>Mitigation Measure AQ-2: All off-road diesel-powered construction equipment greater than 50 horsepower (hp) shall meet or exceed Environmental Protection Agency Tier 4 emission standards, where available. 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.</p>	Equipment Inspection Site Monitoring	Prior to Construction, During Construction	Metropolitan
3.5: Cultural Resources			
<p>Mitigation Measure CUL-1: Photo-documentation to HAER Standards :</p> <p>(a) Prior to construction, Metropolitan will document the history of the resource's technology at HAER Standards Level 2 (compilation of historical plans, as-built drawings, photographs, and contractor specifications; for further detail see www.cr.nps.gov/htp). Prior to the loss of original material (whether visible from the surface or representing character-defining engineered aspects of the Weymouth plant) will be taken to depict their visual setting and existing condition, using large-format photography (4 x 5 inch or greater). Photo-documentation will be guided by a qualified architectural historian.</p> <p>(b) During and after construction, photographs will be taken to depict the demolition, new construction, and completed work of the project components, using 35-mm photography or larger.</p> <p>(c) After construction, the collected documentation will be combined into a HAER-like documentation package (using HAER documentation and formatting) and will be maintained at Metropolitan's Headquarters. This documentation effort will be guided by a qualified architectural historian and documentation will be available for research as appropriate, with consideration given to the security of Metropolitan's facilities.</p>	Site Inspection/Survey	Prior to Construction, During Construction, Post-Construction	Metropolitan

TABLE 8-1 (continued)
MITIGATION MONITORING AND REPORTING PROGRAM – WEYMOUTH IMPROVEMENTS PROGRAM

Mitigation Measures	Monitoring Process	Monitoring Timing	Responsible Person(s)
<p>Mitigation Measure CUL-2: On-site Exhibit or Display:</p> <p>(a) An on-site interpretative display will be prepared to illustrate the evolution of the design change in filter cells technology over time. The display will depict the original filter cell design, construction, and modifications made as technology changed between 1941 to present.</p> <p>(a) An example of each distinct actuator type (those south of Filter Building No. 2 and south of Basins 5 to 8) of the period of significance will be retained for display on the grounds of the Weymouth Plant.</p>	Site Inspection	Post-Construction	Metropolitan
3.8: Noise and Vibration			
<p>Mitigation Measure Noise-1: Prior to any significant noise-generating work (i.e., excavation, grading, demolishing) to be performed for the Solar Generation Project, Filter Rehabilitation, Dry Polymer System Upgrades, ODP Rehabilitation and Seismic Upgrades to the Water Quality Lab, temporary noise barriers/curtains extending at least eight feet in height shall be erected around the perimeter of the active construction area or project site boundary such that the off-site receptor has no view of the construction effort. The noise barrier/curtain would be designed to achieve a reduction of 5 dBA or greater. The surface of the noise barrier (or sound wall, acoustic blanket) would present a solid face from top to bottom without any openings or cutouts.</p>	Site Monitoring	Prior to Construction, During Construction	Metropolitan
<p>Mitigation Measure Noise-2: During construction, the following measures shall be implemented, as necessary, to ensure compliance with applicable construction noise ordinances:</p> <ul style="list-style-type: none"> • All construction equipment, fixed or mobile, shall be outfitted with properly operating and maintained exhaust and intake mufflers, consistent with manufacturers' standards. • Impact tools (e.g., jack hammers, etc.) used for construction shall be hydraulically or electrically powered when feasible to avoid noise associated with compressed air exhaust from pneumatically powered tools. When use of pneumatic tools is necessary, an exhaust muffler on the compressed air exhaust shall be used. External jackets on the tools themselves shall be used when feasible. Quieter procedures, such as use of drills rather than impact tools, shall be used whenever feasible. • Stationary noise sources shall be located as far from adjacent receptors as possible. 	Equipment Inspection Site Monitoring	During Construction	Metropolitan
<p>Mitigation Measure Noise-3: Haul routes shall be restricted to arterial roads and shall not be designated through residential areas whenever feasible.</p>	Design Phase Site Monitoring	Prior to Construction During Construction	Metropolitan

End Page