

4.12 Public Services and Utilities

This section describes the environmental and regulatory setting and discusses impacts associated with the construction and operation of the Mesa 500-kilovolt (kV) Substation Project (proposed project) proposed by Southern California Edison Company (SCE, or the applicant) with respect to public services and utilities.

During the scoping period, one comment was received related to public services and utilities. The Metropolitan Water District of Southern California (MWD) submitted a comment letter stating that a portion of a Metropolitan Middle Feeder pipeline traverses the proposed project area and would need to be relocated to an alternative alignment in order to maintain reliable deliveries of treated water to its member agencies, as well as to facilitate SCE's expansion of the Mesa Substation. The comment highlighted the importance of developing and approving a relocation agreement between MWD and SCE.

4.12.1 Environmental Setting

The proposed project's main components would be constructed within or across several incorporated and unincorporated areas within Los Angeles County, as discussed in Chapter 2.0, "Project Description" and shown in Figure 2-1, "Project Overview." In addition, minor work would occur within the perimeter fence lines of 27 existing satellite substations throughout the Western Los Angeles Basin Electrical Needs Area in southern Los Angeles County and northern Orange County, as shown in Figure 2-2, "Existing Transmission and Subtransmission Lines Associated with the Mesa 500-kV Substation Project."

An existing 72-inch diameter water pipeline owned by MWD traverses the proposed Mesa Substation site, as shown in Figure 2-3a. This pipeline would be removed, and a new 84-inch diameter water pipeline would be constructed across the project site west of the current alignment.

Work at 24 of the 27 satellite substations would not include any ground disturbing activities and would occur primarily within the existing Mechanical Electrical Equipment Room at each of these substations. This work would not impact public services or utilities; therefore, work at these 24 substations is not discussed further in this section.

Operation of the proposed project would serve the Western Los Angeles Basin Electrical Needs Area in southern Los Angeles County and northern Orange County.

4.12.1.1 Public Services

Police Departments

The proposed Mesa Substation site is located within the jurisdiction of the Monterey Park Police Department. The closest police station is located at 320 West Newmark Avenue, Monterey Park, approximately 1.7 miles from the proposed substation site area. The Monterey Park Police Department is a full service police agency with 72 sworn police officers and 46 civilian personnel (City of Monterey Park 2015a). Project components located in Montebello are within the jurisdiction of the Montebello Police Department. The closest police station is located at 1600 West Beverly Boulevard, Monterey Park, approximately 0.2 mile from Telecommunications Route 2A. The Montebello Police Department has 84 sworn police officers, 17 reserve officers, and 45 civilian

1 personnel (City of Montebello 2015). Work in the North Area; in the South Area; along
 2 Telecommunications Routes 1 and 3; and at Walnut, Vincent, and Pardee Substations would be
 3 located within or would cross several other incorporated and unincorporated areas within Los
 4 Angeles County. Each of these different jurisdictions has its own police department.

5
 6 Project components in the Whittier Narrows Natural Area, located on property owned by the
 7 United States Army Corps of Engineers and managed by the County of Los Angeles Department of
 8 Parks and Recreation, is covered by three police jurisdictions, corresponding to the City of Industry,
 9 City of Pico Rivera, and Temple City (LA Times 2015). The City of Pico Rivera, which contracts with
 10 the Los Angeles County Sheriff's Department for law enforcement services, has the closest police
 11 station, located at 6631 Passons Boulevard, Pico Rivera, approximately 2.8 miles from
 12 Telecommunications Route 3.

13
 14 **Fire Departments**

15 The proposed Mesa Substation site area is within the jurisdiction of the Monterey Park Fire
 16 Department. The closest fire station to the proposed project is Monterey Park Fire Department
 17 Station 62 at 2001 West Elmgate, Monterey Park, approximately 1 mile from the proposed
 18 substation site. The Monterey Park Fire Department has 52 sworn fire personnel and three fire
 19 stations (City of Monterey Park 2014). Project components located in Montebello are within the
 20 jurisdiction of the Montebello Fire Department. The closest fire station is Montebello Fire Station 55
 21 located at 600 North Montebello Boulevard, approximately 0.2 mile from the nearest project
 22 component. The Montebello Fire Department consists of 67 sworn personnel and three fire stations
 23 (City of Montebello n.d.).

24
 25 Project components located in the Whittier Narrows Natural Area are within the jurisdiction of the
 26 Los Angeles County Fire Department, which staffs and manages 171 fire stations located
 27 throughout the County (LACoFD n.d.). Table 4.12-1 provides information about the closest fire
 28 stations to the proposed project, corresponding to Battalions 8 and 9, which provide fire and rescue
 29 services and safe haven services for unincorporated Los Angeles County and for cities in the County
 30 which contract with it.

31 **Table 4.12-1 Fire Stations within 5 miles of the Proposed Project**

Station	Address	Approximate Distance from Nearest Component (miles)
Battalion 10 – Headquarters	3615 Santa Anita Avenue, El Monte	3.3
Battalion 8 – Headquarters	7733 Greenleaf Avenue, Whittier	4.5
Battalion 8 – Station 103	7300 Paramount Boulevard, Pico Rivera	2.8

Source: LACoFD n.d.

32
 33 **Medical Facilities**

34 Three full service medical centers with 24/7 Emergency Rooms are located within 6 miles of the
 35 proposed Mesa Substation site:

- 36
 37 • Monterey Park Hospital, located at 900 South Atlantic Boulevard, Monterey Park,
 38 approximately 1.5 miles northwest of the proposed Mesa Substation site area.

- Garfield Medical Center, located at 525 North Garfield Avenue, Monterey Park, approximately 2 miles north of the proposed Mesa Substation site area.
- Los Angeles County + USC Medical Center, located at 2051 Marengo Street, Los Angeles, approximately 5.5 miles northeast of the proposed Mesa Substation site area.

Schools

There are nine public elementary schools, middle schools, and high schools within 0.25 mile of the proposed project in addition to three childcare/preschools and four adult education centers. A complete list of schools within 0.25 mile of the proposed project is included in Table 4.7-3 in Section 4.7, “Hazards and Hazardous Materials.”

Parks and Recreation Facilities

There are more than 30 parks and recreation facilities, including public parks, recreational areas, community centers, trails, and public golf courses located within 1 mile of the proposed project. The closest recreation areas to the proposed Mesa Substation site are La Loma Park (0.3 mile), George E. Elder Park (0.5 mile), Potrero Heights Park (0.7 mile), and Acuna Park (0.8 mile). Telecommunications Route 3 also crosses the Rio Hondo Bike Path, Bosque Del Rio Hondo, Whittier Narrows Recreation Area, and the Whittier Narrows Natural Area.

For a complete list of recreation facilities within 1 mile of the proposed project, and further discussion of park facilities, see Section 4.13, “Recreation.”

Libraries

There are two public libraries within 2 miles of the proposed Mesa Substation site area: the Monterey Park Bruggemeyer Library, located at 318 South Ramona Avenue, Monterey Park, and the Montebello Public Library, located at 1550 West Beverly Boulevard, Montebello.

4.12.1.2 Utilities

Water

The Monterey Park Department of Public Works Water Utility Division provides approximately 95 percent of the City of Monterey Park’s water supply. Two private water companies, the California Water Service Company and the San Gabriel Valley Water Company, supply water for the remaining 5 percent of residences and businesses in the city. The city has 11 pumping wells, which have a total pumping capacity of 14,071 gallons per minute, or 22,677 acre-feet per year (AFY) (City of Monterey Park 2005).

Annually, Monterey Park delivers about 2.8 billion gallons (or 8,593 AFY) of water to 12,300 customers. The city’s water supply consists entirely of groundwater from the Main San Gabriel Basin. There is no limit to the quantity of water that the City of Monterey Park may extract from this basin. However, the city has a prescriptive pumping right to 6,704.08 AFY and a pumper’s share of 3.39216 percent of the Operating Safe Yield. The Operating Safe Yield is determined by the Main San Gabriel Basin Watermaster¹ each year based on need and the existing basin condition. The Main San Gabriel Basin has been in overdraft since 1953. For fiscal year 2014–2015, the operating safe

¹ The Main San Gabriel Basin Watermaster is the agency charged with administering adjudicated water rights within the Main San Gabriel Groundwater Basin.

1 yield was 150,000 AFY. The preliminary Operating Safe Yield recommendation for the Main San
2 Gabriel Basin for fiscal year 2015–2016 is 150,000 AFY and 130,000 AFY for each subsequent year
3 through 2020 (Main San Gabriel Basin Watermaster 2015a). In addition to its pumper’s share,
4 Monterey Park has a cyclic storage agreement with the Watermaster enabling the advance
5 purchase of untreated imported water stored in the Main San Gabriel Basin and its extraction when
6 imported water supplies are short. Monterey Park’s Cyclic Storage Account is regularly used to
7 balance differences between the city’s production right and production each year (Main San Gabriel
8 Basin Watermaster 2013). At the end of each water year, the amount of water extracted by the City
9 of Monterey Park is compared to the production right determined by the Watermaster. Unused
10 rights can be carried over to the next year. Over-production is balanced using available cyclic
11 storage and the Watermaster charges a fee for each acre-foot of the remaining over production.
12

13 Table 4.12-2 presents the city’s historic water use (Main San Gabriel Basin Watermaster 2015b,
14 2014, 2013, 2012, 2011). Based on information provided by Watermaster, the average baseline
15 water use in the city (which was determined by averaging water use from 2011 through 2015) is
16 8,631 AFY.
17

Table 4.12-2 City of Monterey Park's Historic Water Use (AFY)

Water Year	Production Right ⁽¹⁾	Production	Overproduction ⁽²⁾	Cyclic Storage Purchase	Replacement Requirement
2010–2011	766.67	8,403.21	7,636.54	7,500	7,636.54
2011–2012	123.54	8,758.49	8,634.95	N/A	1,134.95 ⁽³⁾
2012–2013	6,784.32	8,833.51	2,049.39	7,000	0 ³
2013–2014	6,105.89	9,024.76	2,918.87	2,549.19	0 ³
2014–2015	4,829.24	8,139.54	3,310.30	N/A	3,310.30

Source: Main San Gabriel Basin Watermaster 2011, 2012, 2013, 2014, 2015b.

Notes:

(1) The annual water supply allocated to the city is dependent on the recommended operating safe yield for the basin for each fiscal year.

(2) Over-production was calculated by subtracting Production Right from Production for each water year.

(3) Water was balanced through the use of cyclic storage.

Key:

AFY acre-feet per year

N/A not applicable

18
19 The city published an updated Water Management Plan in 2012. Since 2000, the maximum annual
20 water use was recorded at 11,018 acre-feet (AF) in water year 2006–2007. Water use has declined
21 since 2007. According to the 2012 report, future water use is not expected to change from the
22 demand calculated in the 2012 report, which totaled 8,403.21 AF in water year 2010–2011 (City of
23 Monterey Park 2012). As shown in Table 4.12-2, each year the city produces more water than is
24 allocated to it and uses either water in its cyclic storage account or payments to the Watermaster to
25 account for the overproduction. In 2012–2013, overproduction reached a minimum of 2,049.39 AF.
26

27 The MWD supplies water to the southern portion of unincorporated Los Angeles County, including
28 the unincorporated areas in the vicinity of the proposed project. This pipeline also serves the cities
29 of Compton and Long Beach, as well as the Central Basin Municipal Water District, Upper San
30 Gabriel Valley Municipal Water District, and Three Valleys Municipal Water District (MWD 2015).
31 An existing 72-inch MWD water pipeline currently traverses the proposed Mesa Substation site
32 area and Potrero Grande Drive in a north-south alignment, as shown in Figure 2-3a “Project
33 Components.” This pipeline would be relocated as part of the proposed project.

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Wastewater

The City of Monterey Park sewer system consists of 126 miles of sewer pipelines and 2,498 manholes. The city collects the wastewater from the community and transports it to Los Angeles County Sanitation District (LACSD) for treatment at the Joint Water Pollution Control Plant, located at 24501 South Figueroa Street, Carson. This plant treats over 300 million gallons of wastewater per day (Sanitation Districts of Los Angeles County n.d.). LACSD operates several trunk lines through the city and there are also areas of the city that connect directly into the LACSD trunk line (Phoenix Civil Engineering Inc. 2014).

Stormwater

The proposed project area is located within the Los Angeles River Watershed, which covers an area of approximately 834 square miles (LACDPW 2015). On-site runoff flows toward the southwest area of the substation site and into the existing drainage system, where it is collected in storm drains that flow into the Rio Hondo Channel southeast of the project site. Onflow from areas west of the proposed Mesa Substation site area currently flows into the proposed project area and would be rerouted around the proposed substation site.

The City of Monterey Park is responsible for the operation and maintenance of the local drainage and storm water facilities within the city limits. Stormwater runoff in Monterey Park is managed from all streets and parking lots with approximately 855 catch basins or points of entry into the system (City of Monterey Park n.d.).

Solid Waste

The proposed project would generate solid waste during construction (e.g., concrete, non-recyclable metals, green waste, refuse, spoils, trash, and wood poles). SCE would use ~~three~~ four approved, licensed landfills in the vicinity of the proposed project for the solid waste materials: Savage Canyon Landfill in Whittier, ~~Azuza~~ Azuza Land Reclamation Landfill in ~~Azuza~~ Azuza, and Scholl Canyon Landfill in Los Angeles, ~~and El Sobrante Landfill in Corona~~. These landfills are rated as Class III landfills, which accept clean dirt, concrete, and asphalt (CalRecycle 2015a, b, c). Additionally, Asuza landfill can accept asbestos and nonhazardous petroleum contaminated soil (CalRecycle 2015a). ~~Savage Canyon~~ El Sobrante Landfill can also accept treated wood waste (CalRecycle 2015b). Disposal of hazardous materials is discussed in Section 4.7, “Hazards and Hazardous Materials.” Characteristics of the ~~three~~ four landfills that would serve the proposed project are shown in Table 4.12-3. The two Class I landfills where hazardous waste may be disposed of (Clean Harbors Buttonwillow Landfill and Kettleman Hills Facility) are also included in the table.

Table 4.12-3 Landfills Serving the Proposed Project

Landfill	Distance to Mesa Substation (miles)	Estimated Closure Date	Total Amount of Waste Permitted (cubic yards)	Remaining Estimated Waste Capacity (cubic yards)
Savage Canyon Landfill	10	2055	19,337,450	9,510,833
Azuza <u>Azuza</u> Land Reclamation	17	2025	66,670,000	34,100,000

Table 4.12-3 Landfills Serving the Proposed Project

Landfill	Distance to Mesa Substation (miles)	Estimated Closure Date	Total Amount of Waste Permitted (cubic yards)	Remaining Estimated Waste Capacity (cubic yards)
Scholl Canyon Landfill	36	2030	58,900,000	9,900,000
<u>El Sobrante Landfill</u>	<u>40</u>	<u>2040</u>	<u>184,930,000</u>	<u>145,530,000</u>
<u>Clean Harbors Buttonwillow Landfill</u>	<u>~135</u>	<u>2040</u>	13,250,000	<u>9,362,500</u>
<u>Kettleman Hills Facility</u>	<u>~200</u>	<u>Unknown</u>	15,600,000	<u>Unknown</u>

Source: CalRecycle 2015a,b,c

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4.12.2 Regulatory Setting

This subsection summarizes federal, state, and local laws; regulations; and standards that govern public services and utilities in the project area.

4.12.2.1 Federal

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act of 1976 (RCRA) (42 United States Code § 6901 et seq.) establishes requirements for the management of solid and hazardous waste and authorizes the states to carry out many functions of RCRA through their own waste programs and laws. The U.S. Environmental Protection Agency has promulgated regulations to implement the provisions of RCRA (40 Code of Federal Regulations Parts 239–282).

4.12.2.2 State

Emergency Regulations Related to California Drought Conditions

On January 17, 2014, Governor Brown issued an Executive Order declaring a State of Emergency due to current drought conditions in California. The January 17th Executive Order directed the Department of Water Resources to coordinate with local water districts on a campaign urging Californians to reduce water usage by 20 percent (CA Office of the Governor 2014a).

On April 24, 2014, Governor Brown issued another Executive Order urging that immediate action be taken “to mitigate the effects of the drought conditions upon the people and property within the State of California.” The April 24th Executive Order also directed the State Water Resources Control Board to “adopt and implement emergency regulations pursuant to Water Code section 1058.5, as it deems necessary to prevent the waste, unreasonable use, unreasonable method of use, or unreasonable method of diversion of water, to promote water recycling or water conservation, and to require curtailment of diversions when water is not available under the diverter’s priority of right” (CA Office of the Governor 2014b).

On July 6, 2014, the State Water Resources Control Board responded to the Governor’s April 24th Executive Order by adopting Emergency Regulations that require urban water suppliers to promote

1 water conservation, prepare water shortage contingency plans, and submit monthly monitoring
2 reports, among other measures (SWRCB 2014).

4 **California Integrated Waste Management Act (Assembly Bill 939) and Assembly Bill 341**

5 The California Integrated Waste Management Act of 1989 (Public Resource Code 40000 et seq.;
6 Assembly Bill 939) requires all county and local governments to adopt a Source Reduction and
7 Recycling Element to identify ways to reduce the amount of solid waste sent to landfills. This law
8 set reduction targets of 25 percent by 1995 and 50 percent by the year 2000. Assembly Bill 341,
9 signed into law in 2011, established a new statewide target of 75 percent disposal reduction by the
10 year 2020.

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12 Assembly Bill 341 requires the California Department of Resources Recycling and Recovery
13 (CalRecycle) to develop and adopt regulations for mandatory commercial recycling, which was not
14 required under the previous version of the Integrated Waste Management Act. The new Mandatory
15 Commercial Recycling Regulation was approved at the CalRecycle monthly public meeting in
16 January 2012. On and after July 1, 2012, businesses are required to recycle. The Integrated Waste
17 Management Act, as amended by Assembly Bill 341, however, does not mandate a diversion
18 percentage for businesses. It only requires that businesses implement a commercial recycling
19 program.

20 21 **California Green Building Standards**

22 California Code of Regulations Title 24, Part 11 establishes requirements for improving health,
23 safety, and general welfare by enhancing the planning, design, operation, construction, use, and
24 occupancy of every newly constructed building or structure throughout the State of California.
25 Section 5.408 of this code establishes mandatory requirements for construction waste reduction,
26 disposal, and recycling for nonresidential building structures. In particular, Section 5.408.1 requires
27 recycling and/or salvaging for reuse of a minimum of 50 percent of the nonhazardous construction
28 and demolition waste. In addition, Section 5.408 requires preparation of a Construction Waste
29 Management Plan, selection of a waste management company that can provide verifiable
30 documentation, alternatives for waste stream reduction, and requirements for managing excavated
31 soils and land clearing debris.

32 33 **Underground Service Alert: Protection of Underground Infrastructure**

34 Pursuant to California Government Code Sections 4216–4216.9, the appropriate regional
35 notification center must be contacted at least two working days prior to any excavation activities.
36 Following field-marking by the underground infrastructure operator, the excavator is then required
37 to determine the exact location of subsurface installations that may be affected by excavating with
38 hand tools within the area of the approximate location of subsurface installations.

39 40 **4.12.2.3 Regional and Local**

41 42 **County of Los Angeles Water Wasting Ordinance**

43 The 2010 County of Los Angeles' Water Wasting Ordinance establishes regulations for the
44 conservation of water, including (Los Angeles County 2010):

- 45
46 • Prohibits watering down or washing sidewalks, walkways, driveways, parking areas, and
47 other paved surfaces.

- 1 • Prohibits watering lawns or landscaping between the hours of 10:00 a.m. and 5:00 p.m.
- 2 • Prohibits watering lawns or landscaping more than once a day.
- 3 • Prohibits watering to the extent that water runs onto adjoining streets, parking lots, or
- 4 alleys.
- 5 • Requires that hoses, faucets, and sprinkling systems be inspected for leaks and that leaks be
- 6 repaired as soon as is reasonably practicable.
- 7

8 **County of Los Angeles Water-Efficient Landscaping Ordinance**

9 Chapter 71 of the Los Angeles County Code (Title 26) provides regulations for designing, installing
10 and maintaining water-efficient landscapes in new projects (Los Angeles County 1987). New
11 projects are required to submit a landscaping documentation package that specifies landscaping
12 types and conservation measures, as well as estimates water usage. This chapter also provides for
13 water management practices and water waste prevention for established landscapes.

14 **City of Monterey Park General Plan**

15 The Safety and Community Services Element and the Resources Element of the City of Monterey
16 Park General Plan addresses public service systems and facilities, including solid waste and utilities
17 and service systems as well as parks. Specifically, the following goals are applicable to the proposed
18 project component within the City of Monterey Park (City of Monterey Park 2000):

- 19 • **Safety and Community Service Element Goal 9.0:** *Achieve and maintain a 50 percent*
20 *reduction (from baseline year 1994) in solid waste produced by the City.*
- 21 • **Safety and Community Service Element Goal 13.0:** *Provide adequate sewer, water, and*
22 *drainage systems to meet the needs of City residents and businesses.*
- 23 • **Resources Element Goal 1.0:** *Optimize use of established public parks, and provide park*
24 *facilities that meet the needs of the City's population.*
- 25 • **Resources Element Goal 4.0:** *Conserve and protect groundwater supply and water resources.*
26

27 **City of Monterey Park Urban Water Management Plan**

28 The City of Monterey Park Urban Water Management Plan describes the management tools and
29 options used by the City of Monterey Park to maximize resources and minimize the need to import
30 water from other regions (City of Monterey Park 2005).

31 **City of Monterey Park Water Conservation Ordinance**

32 The City of Monterey Park adopted a water conservation ordinance enacting water conservation
33 measures and requirements in accordance with Emergency Regulations Promulgated by the
34 California State Water Resources Control Board in 2015. This ordinance requires residents and
35 businesses to conserve water in response to the statewide drought, including the following specific
36 provisions (City of Monterey Park 2015b):

- 37 • Prohibits washing down sidewalks, walkways, driveways, parking areas, or other paved
38 surfaces.
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- 1 • Prohibits washing cars, boats, trailers, or other mobile equipment, except at a commercial
2 car wash, using only reclaimed water, or by using a bucket or a water hose equipped with
3 an automatic shut-off nozzle.
- 4 • Prohibits watering lawns or landscaping more than once a day, and between the hours of
5 9:00 a.m. and 5:00 p.m. any day.
- 6 • Requires inspection of hoses, faucets, or sprinklers for leaks and requires that repairs are
7 made as soon as possible.
- 8 • Requires inspection of indoor plumbing and faucets for leaks and requires that repairs are
9 made as soon as possible.
- 10 • Prohibits the installation of single pass cooling systems in new commercial buildings
11 requesting new water utility service.
- 12 • Prohibits leaving a water hose running.

13
14 **City of Monterey Park Resolution Declaring a Stage 2 Drought Emergency**

15 On July 1, 2015, the Monterey Park City Council adopted Ordinance No. 2121 declaring a Stage 2
16 drought emergency. This action requires additional mandatory water restrictions for residents and
17 businesses effective August 1, 2015. The Council action to declare the Stage 2 drought emergency
18 plan:

- 19
- 20 • Bans watering public street medians and all watering between 9 a.m. and 5 p.m.
- 21 • Limits all watering to two days per week: Mondays and Thursdays only.
- 22 • Adopts a 20 percent water conservation goal citywide that aligns with mandated reductions
23 set by the state.
- 24 • Reinforces that violators face fine up to \$500 per incident.

25
26 **City of Montebello General Plan**

27 The Conservation Element of the City of Montebello General Plan includes the following goal (City
28 of Montebello 1975):

- 29
- 30 • **Goal 3:** *Promote the reclamation of waste and recycling of materials wherever feasible*

31
32 **City of Montebello Water Conservation Ordinance**

33 In 2009, the City of Montebello adopted its Water Conservation Ordinance (Chapter 8.28 of
34 Montebello Municipal Code). This ordinance includes requirements to reduce water consumption
35 within the City of Montebello through conservation and effective water supply planning.
36 Specifically, the ordinance contains the following provisions:

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- 38 • Prohibits the watering or irrigating of a lawn, landscape, or other vegetated area with
39 potable water between 10:00 a.m. and one hour before sunset.
- 40 • Limits continuous water usage for irrigation purposes to no longer than 15 minutes per day.
- 41 • Prohibits excessive water flow or runoff onto non-landscaped areas.
- 42 • Prohibits the use of water for washing down hard or paved surfaces.

- Prohibits the use of water for washing vehicles, except by use of a hand-held bucket.

Other General Plans

General Plans for the following jurisdictions were also reviewed, but none of the goals and policies related to recreation contained in these documents were found to be applicable to the proposed project:

- City of Bell Gardens (1995) General Plan
- City of Commerce (2008) 2020 General Plan
- City of Industry (2014) General Plan
- City of Pasadena (not dated) General Plan
- City of Rosemead (2010) General Plan
- City of South El Monte (2000) General Plan
- Los Angeles County (2015) General Plan

4.12.3 Impact Analysis

4.12.3.1 Methodology and Significance Criteria

Impacts on public services and utilities were evaluated according to the following significance criterion. The criterion was defined based on the checklist items in Appendix G of the California Environmental Quality Act Guidelines. The proposed project would cause a significant impact on public services or utilities if it would:

- a) Result in substantial adverse physical impacts on governmental facilities or from the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services: (1) fire protection, (2) police protection, (3) schools, (4) parks, or (5) other public facilities;
- b) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board (RWQCB);
- c) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- d) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- e) Not have sufficient water supplies available to serve the project from existing entitlements and resources or require new or expanded entitlements;
- f) Result in determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments;
- g) Be served by a landfill without sufficient permitted capacity to accommodate the project's solid waste disposal needs; or

1 h) Not comply with federal, state, or local statutes and regulations related to solid waste.
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3 **4.12.3.2 Applicant Proposed Measures**
4

5 There are no applicant proposed measures associated with public services or utilities.
6

7 **4.12.3.3 Environmental Impacts**
8

9 **Impact PSU-1: Result in substantial adverse physical impacts on governmental facilities or**
10 **from the need for new or physically altered governmental facilities, the construction of**
11 **which could cause significant environmental impacts, in order to maintain acceptable**
12 **service ratios, response times, or other performance objectives for any of the following**
13 **public services: (1) fire protection, (2) police protection, (3) schools, (4) parks, or (5) other**
14 **public facilities.**
15

16 **Fire Protection**

17 *LESS THAN SIGNIFICANT*

18 Risks to people or structures associated with the potential for loss, injury, or death related to
19 wildland fires is discussed in Section 4.7, "Hazards and Hazardous Materials." As noted in that
20 section, the proposed main project components would not be located in an area designated by the
21 California Department of Forestry and Fire Protection as a Very High Fire Hazard Severity Zone.
22 Sparks from construction equipment or from site personnel smoking would increase the risk of fire
23 in the proposed project area. However, project components would be located within, or cross,
24 several jurisdictions, each of which provide fire protection for areas within their jurisdiction. The
25 temporary increase in fire risk in any one of these jurisdictions would not impact the level of
26 service for fire protection in that jurisdiction such that construction of new or alteration of existing
27 fire station would be needed to maintain acceptable service.
28

29 Temporary lane closures or lane reductions would be required during construction. These closures
30 would be coordinated with emergency services and appropriate traffic controls measures would be
31 implemented, as discussed in Section 4.14, "Traffic and Transportation." Therefore, there would be
32 no impact on response times.
33

34 Proposed project operations would be similar to ongoing operations for the existing Mesa
35 Substation and existing distribution, subtransmission, and transmission lines. There would be no
36 increase in personnel during operations from the existing conditions. The applicant would continue
37 to comply with California Public Utilities Commission (CPUC) General Order requirements related
38 to clearance for electrical equipment to reduce the potential for fire hazards, as discussed further in
39 Section 4.7, "Hazards and Hazardous Materials." Therefore, impacts to fire protection during
40 construction and operation would be less than significant.
41

42 **Police Protection**

43 *LESS THAN SIGNIFICANT*

44 Police assistance may be needed in the case of theft or vandalism of the applicant's materials, which
45 would be stored within the proposed Mesa Substation work area, staging yards, or work areas at
46 satellite substations. These areas would be secured during construction to reduce the potential for

1 such activities. Construction equipment would also be stored at staging yards, which would be
2 fenced to reduce the potential for theft.

3
4 Proposed operations would be similar to ongoing operations for the existing Mesa Substation and
5 existing distribution, subtransmission, and transmission lines. The Mesa Substation site area would
6 be enclosed by a 12-foot perimeter wall constructed in compliance with federal and municipal
7 security requirements. Barbed and/or razor wire would be affixed near the top of the enclosure
8 inside of the substation site. There would be no increase in personnel during operations from the
9 existing conditions.

10
11 The potential need for police services in any one of the jurisdictions within which the proposed
12 project is located, or crosses, would not impact the level of service such that construction of new or
13 alteration of existing police station would be needed to maintain acceptable service. Therefore,
14 impacts to police protection during construction and operation would be less than significant.

15 **Schools, Parks, and other Public Facilities**

16 *NO IMPACT*

17
18 Construction of the proposed project would last approximately 55 months. During peak
19 construction periods, the applicant estimates that up to 435 employees could be working
20 simultaneously on various components throughout the proposed project area.

21
22 The applicant anticipates that construction would be performed by either the applicant's local
23 construction crews or contractors commuting from the Los Angeles area and would not require
24 workers to relocate, as discussed further in Section 4.11, "Population and Housing," and Section
25 4.13, "Recreation." There would be no increase in personnel during operations. Therefore, the
26 proposed project would not impact the performance levels of schools, parks, or other public
27 facilities, necessitating the construction of new, or alteration of existing, public facilities for these
28 uses. For additional information regarding impacts on recreation associated with construction of
29 the proposed project see Section 4.13, "Recreation."

30 **Impact PSU-2: Exceed wastewater treatment requirements of the applicable Regional Water** 31 **Quality Control Board.**

32 *LESS THAN SIGNIFICANT*

33 **Construction**

34
35 Some wastewater would be generated during the 55-month construction period. Up to 435
36 employees may use portable restrooms during peak construction periods. Portable restrooms
37 would be located in various locations across the proposed project area (e.g., at the proposed Mesa
38 Substation site, at staging yards, along telecommunications routes, or at other existing substations
39 where work would be performed). Wastewater from these portable restrooms would be disposed
40 of by a licensed contractor at an off-site location, in accordance the Los Angeles RWQCB's
41 requirements. Therefore, the proposed project would not exceed wastewater treatment
42 requirements established by the Los Angeles RWQCB, and there would be a less than significant
43 impact under this criterion during construction.

44 **Operation and Maintenance**

45
46 During operations, minimal wastewater would be generated at the proposed Mesa Substation site
47 from the use of on-site restroom facilities. The City of Monterey Park is the current service provider

1 for the existing Mesa Substation and would continue to provide service for the proposed Mesa
2 Substation during operations. Wastewater collected by the city would be transported through
3 sewer pipelines to the LACSD for treatment at the Joint Water Pollution Control Plant in Carson,
4 California. Staffing at the proposed Mesa Substation is anticipated to be similar to current staffing at
5 the existing Mesa Substation; therefore, the amount of wastewater generated would not be an
6 increase from baseline conditions. No other proposed components would have any effect on
7 wastewater treatment requirements during operations. As a result, impacts under this criterion
8 would be less than significant during operations.
9

10 **Impact PSU-3: Require or result in the construction of new water or wastewater treatment**
11 **facilities or the expansion of existing facilities, the construction of which could cause**
12 **significant environmental effects.**

13 *LESS THAN SIGNIFICANT*

14 **Construction**

15 As previously described, construction crews would use portable toilets and only a small amount of
16 wastewater would be generated from the up to 435 construction workers during construction.
17 Wastewater generated during construction would be disposed of by a licensed contractor at an off-
18 site location, in compliance with Los Angeles RWQCB standards and sanitation waste management
19 practices. Potable water is not needed during construction.
20

21 Construction of the proposed project would also require the relocation of an existing MWD 72-inch
22 pipeline, which currently crosses the proposed Mesa Substation site area and Potrero Grande Drive
23 in a north-south alignment. This activity would not impact water or wastewater treatment facilities.
24 Other impacts associated with the MWD pipeline relocation are discussed under Impact PSU-9.
25

26 Therefore, construction of the proposed project would not result in the need for additional capacity
27 of the existing municipal water or wastewater treatment systems, the construction of which could
28 cause a significant environmental effect. Impacts under this criterion would be less than significant
29 during construction.
30

31 **Operation and Maintenance**

32 Operation and maintenance activities for the proposed project would be similar to those currently
33 conducted by SCE at the existing substation facility. As previously discussed, these activities would
34 generate minimal wastewater, mainly from the on-site permanent restrooms and sinks. SCE would
35 apply for and obtain approval for modification of sewer service from the City of Monterey Park in
36 order to connect its new facilities to the sewer system. However, since the number of staff is not
37 anticipated to increase at the substation, the amount of wastewater generated from the use of
38 restroom facilities would not increase. Accordingly, there would be no increase in the wastewater
39 volume generated during operations. Therefore, the proposed project would not result in the need
40 to expand existing or construct new wastewater treatment facilities.
41

42 During operations, SCE has indicated that there would be no increase in water use from existing
43 operations and maintenance activities at the proposed project site. SCE currently uses an annual
44 average of 3 AFY. SCE has indicated that it would continue to use water for the restroom facilities,
45 irrigation, and equipment maintenance. Because there is no anticipated increase in water use, no
46 new or expanded water delivery facilities would be necessary for operation of the proposed project.
47 Potable water would be used for the irrigation of any on-site landscaping associated with the
48 substation, and deionized water would also be used for equipment maintenance, similar to current

1 operations. In addition, the proposed project would comply with Monterey Park Emergency Water
2 Conservation Regulations, in accordance with a water ordinance adopted by the City in 2015. (City
3 of Monterey Park 2015b). The ordinance enacts water conservation measures and requirements in
4 response to emergency regulations promulgated by the State Water Resources Control Board
5 (SWRCB), including irrigation and watering restrictions. Therefore, impacts under this criterion
6 would be less than significant during operations.
7

8 **Impact PSU-4: Require or result in the construction of new storm water drainage facilities or**
9 **expansion of existing facilities.**

10
11 **Construction**

12 *LESS THAN SIGNIFICANT WITH MITIGATION*

13 Construction of the proposed Mesa Substation would alter the existing drainage patterns on site.
14 The proposed Mesa Substation site area currently slopes from the northeast toward the southwest.
15 During construction, the applicant would remove vegetation and grade and fill the site area to level
16 the site. There are several ephemeral drainages that would be filled during site preparation, as
17 discussed further in Section 4.3, "Biological Resources." Construction of the proposed Mesa
18 Substation would result in approximately 18.1 acres of new impervious surfaces from new
19 driveways, equipment foundation pads, and buildings within the site area.
20

21 Impacts to these drainage features, grading, vegetation removal and the introduction of new
22 impervious surfaces would increase water runoff to the storm water drainage system during
23 construction. The use of water for dust control purposes would also contribute to runoff. Onflow
24 from upstream areas (i.e., ~~west~~ east of the proposed substation site area) would also be interrupted
25 by construction of the proposed substation. Changes to sheetflow and onflow could require or
26 result in the construction of new storm water drainage facilities or the expansion of existing
27 facilities if not properly managed, which would result in significant environmental impacts.
28 However, MM HY-1 (see Section 4.8, "Hydrology and Water Quality") would require that SCE
29 develop a Storm Water Pollution Prevention Plan (SWPPP), which would include design features to
30 control runoff rates, direct water to the direction of natural drainage, and incorporate SWPPP best
31 management practices to minimize erosion that could cause sedimentation and loss of receiving
32 water capacity during construction. In addition, MM HY-3 requires a drainage plan be prepared and
33 implemented by the applicant and approved by Monterey Park and the CPUC. The design would
34 limit impacts to existing drainage patterns downstream of the substation by ensuring that runoff
35 does not alter swales and other drainage features outside of the substation limits. With
36 implementation of the SWPPP and design features as part of the final grading plan, the proposed
37 project would not result in the construction of new storm water drainage facilities or the expansion
38 of existing facilities during project construction and impacts under this criterion would be less than
39 significant.
40

41 **Operation and Maintenance**

42 *LESS THAN SIGNIFICANT WITH MITIGATION*

43 During operation, on-site runoff at the proposed Mesa Substation site would be directed to a
44 detention basin in the southwest corner of the site area or otherwise contained by allowing it to
45 percolate into the ground in permeable areas. Runoff discharge from the detention basin would
46 follow the existing drainage pattern, from the northeast towards the southwest. However, impacts
47 from detention basin that is not calculated to adequately capture runoff may overwhelm the system

1 and could result in the construction of new storm water drainage facilities or an expansion of
2 existing facilities. This could result in significant environmental impacts. To ensure the detention
3 basin is adequate to handle stormwater runoff MM HY-4 requires it be built in accordance with the
4 Los Angeles County Department of Public Works Hydrology Manual and its Low Impact
5 Development Standards Manual. Stormwater runoff would be collected in existing and upgraded
6 drainage systems on site that would be designed to accept the anticipated runoff capacity.
7 Therefore, the proposed project would not result in the construction of new storm water drainage
8 facilities or the expansion of existing facilities during project operations, and impacts under this
9 criterion would be less than significant.

10
11 **Impact PSU-5: Insufficient water supplies available to serve the project from existing**
12 **entitlements and resources or new or expanded entitlements required.**
13 *LESS THAN SIGNIFICANT*

14 **Construction**

15 During construction, The Monterey Park Department of Public Works Water Utility Division would
16 supply water for the proposed project. An estimated ~~404279~~ AF of water would be used throughout
17 the 55-month duration of construction.

18 As previously discussed, the City of Monterey Park has a prescriptive pumping right to 6,704.08
19 AFY and a pumper's share of 3.39216 percent of the operating safe yield (OSY). The preliminary
20 OSY for the Main San Gabriel Basin for fiscal year 2015–2016 is 150,000 AFY and approximately
21 130,000 AFY through 2020 (Main San Gabriel Basin Watermaster 2015a). Based on this OSY, the
22 city would be entitled to approximately 5,882 AFY in fiscal year 2015–2016 and approximately
23 5,098 AFY in fiscal years 2017 through 2020.

24 In fiscal year 2014–2015, the City of Monterey Park pumped a total of 8,139 AFY of groundwater
25 from wells (Main San Gabriel Basin Watermaster 2015b). In the last five years, the highest water
26 use in the City was 9,024.67 AF (Main San Gabriel Basin Watermaster 2015b). Given the likely OSY
27 and predicted demand, it is reasonable to assume that the City will produce more than its
28 entitlement during the years of project construction and will be required to pay the Watermaster a
29 fee to recharge the ground basin. To conservatively assess impacts, it is assumed that up to half of
30 ~~the estimated construction water, or 140 AF,~~ may be used in the first two years and last year of
31 construction, when the majority of grading activities would occur, and less in ~~other subsequent~~
32 years. This water requirement would add to the City's expected overproduction beyond their
33 entitlement. However, 140 AF would amount to a less than 7 percent increase in overproduction
34 (based on 2012, when the City's overproduction was the lowest in the last five years and totaled
35 2,049 AF). The applicant had requested the City to issue a will-serve letter to cover a five-year
36 water supply during construction. Based on the current state of the basin, the City stated it would
37 only issue a will-serve letter to cover one to two years of supply (Talbot et al. 2015). However, it is
38 reasonable to assume that the City could provide sufficient water for the duration of project
39 construction based on the City's past practice with overproduction and the fact the City of Monterey
40 Park is not limited in the total water it may pump from the Main San Gabriel Basin. Therefore, there
41 would be sufficient water supply available to serve the project during construction, and no new or
42 expanded entitlements would be required for construction of the proposed project. Impacts under
43 this criterion would be less than significant.

1 **Operation and Maintenance**

2 During operations, SCE has indicated that there would be no increase in water use over that used
3 for existing operations and maintenance activities at the proposed project site. SCE currently uses
4 an annual average of 3 AFY. SCE has indicated that it would continue to use water for the restroom
5 facilities, irrigation, and equipment maintenance. Because there is no anticipated increase in water
6 use, no new or expanded water supply entitlements would be necessary for operation of the
7 proposed project. In addition, the project would comply with Monterey Park Emergency Water
8 Conservation Regulations, according to a water ordinance adopted by the city in 2015, which
9 requires water conservation measures and requirements in response to emergency regulations
10 promulgated by the SWRCB, including irrigation and watering restrictions, for as long as they are in
11 effect (City of Monterey Park 2015b). Impacts under this criterion would be less than significant.
12

13 **Impact PSU-6: Result in a determination by the wastewater treatment provider, which**
14 **serves or might serve the project, that it has adequate capacity to serve the project's**
15 **projected demand in addition to the provider's existing commitments.**
16

17 **Construction**

18 *LESS THAN SIGNIFICANT*

19 Portable toilets would be used during construction to manage sanitation wastewater for an average
20 of 126 workers and a maximum of 435 workers. Based on 29 Code of Federal Regulations Section
21 1926.51(c), at least eight portable toilets will be required when the maximum number of workers
22 are on site. The average portable toilet holds 60 gallons of wastewater; therefore, approximately
23 480 gallons of wastewater would be generated per day during construction. The generated
24 wastewater would be pumped by licensed sanitation contractors, in compliance with RWQCB
25 standards and sanitation waste management practices, and transported to a wastewater treatment
26 plant. The Joint Water Pollution Control Plant, located in Carson, California, serves the City of
27 Monterey Park Area and treats over 300 million gallons of wastewater per day (Sanitation Districts
28 of Los Angeles County n.d.). The small, temporary increase in wastewater comprises 0.00016
29 percent of and would be negligible in comparison to the 300 million gallons of wastewater treated
30 daily at the facility and would not result in an exceedance of wastewater treatment capacity.
31 Therefore, impacts during construction would be less than significant under this criterion.
32

33 **Operation and Maintenance**

34 *NO IMPACT*

35 Operation and maintenance activities for the proposed project would be similar to those currently
36 conducted by SCE on the existing substation facility. As previously discussed, these activities would
37 generate minimal wastewater, mainly from the on-site permanent restrooms and sinks. However,
38 since the number of staff is not anticipated to increase at the substation, the amount of wastewater
39 generated from the restroom facilities would not increase. Because there would be no increase in
40 wastewater volumes, there would be no impact on wastewater treatment facilities during
41 operations.
42

1 **Impact PSU-7: Served by a landfill without sufficient permitted capacity to accommodate the**
2 **project's solid waste disposal needs.**

3 *LESS THAN SIGNIFICANT*

4 **Construction**

5 During construction of the proposed project, solid waste, e.g., waste from building construction,
6 waste associated removal of existing buildings, excess soils, green waste, refuse, spoils, and treated
7 wood poles would be generated. Treated wood poles would be reused by SCE, returned to the
8 manufacturers, disposed of in a Class I hazardous waste landfill, or disposed of in the lined portion
9 of an RWQCB-certified municipal landfill, as discussed further in Section 4.7, "Hazards and
10 Hazardous Materials." The remaining solid waste that cannot be recycled would be classified and
11 transported to Savage Canyon Landfill, ~~Azuza~~ Azusa Land Reclamation Landfill, ~~or~~ Scholl Canyon
12 Landfill, or El Sobrante Landfill in accordance with all applicable federal, state, and local regulations
13 for solid and hazardous waste disposal. These ~~three~~ four landfills have a combined remaining
14 capacity of approximately ~~53.5~~ 199 million cubic yards (CY) (CalRecycle 2015a, b, c) as shown in
15 Table 4.12-3. The estimated quantity of solid waste that would be generated for the proposed
16 project to be deposited at approved landfills is approximately 41,800 CY. Impacts under this
17 criterion would be less than significant.

18
19 **Operation and Maintenance**

20 During operations, activities at the proposed Mesa Substation would be similar to ongoing
21 operations at the existing Mesa Substation. Because there would be no increase in employees at the
22 site, there would be no increase in common waste generated by employees. Standard, periodic
23 maintenance activities at all of the proposed components could generate minimal waste from the
24 materials used to perform the activities. However, there would be no increase in the amount of
25 solid waste generated from ongoing operations at these same components. Because there would be
26 no increase in solid waste generated from the current baseline, and because there are several
27 landfills within the area with sufficient capacity, there would be no impact under this criterion.

28
29 **Impact PSU-8: Noncompliance with federal, state, or local statutes and regulations related to**
30 **solid waste.**

31 *NO IMPACT*

32 **Construction**

33 Construction of the proposed project would result in the generation of both hazardous and non-
34 hazardous solid wastes. Disposal of hazardous waste is discussed under Impact PSU-7, as well as in
35 Section 4.7, "Hazards and Hazardous Materials." Non-hazardous waste (e.g., wood, soil, vegetation,
36 sanitary waste, and metal) would be disposed of at an appropriate landfill with sufficient capacity,
37 as discussed under Impact PSU-7, or recycled to the extent feasible.

38
39 The majority of project-related construction waste would be generated within the City of Monterey
40 Park from work at the proposed Mesa Substation site and on adjacent transmission line
41 components. The proposed project would generate approximately 41,800 CY of solid waste during
42 construction, of which approximately 18,392 CY (or 44 percent) would be recycled (SCE 2015). The
43 City of Monterey Park has adopted a Source Reduction and Recycling Element to document its
44 waste diversion goals, recycling programs, and strategies for achieving solid waste diversion goals
45 in compliance with Assembly Bill 939 (California Integrated Waste Management Act) standards
46 (City of Monterey Park 2000). The applicant would comply with Assembly Bill 939 and local Source
47 Reduction and Recycling Elements. In addition, the California Green Building Standards require

1 recycling and/or salvaging for reuse of a minimum of 50 percent of the nonhazardous construction
2 and demolition waste for nonresidential building structures. The applicant would comply with this
3 requirement for covered buildings at the proposed Mesa Substation site. Therefore, there would be
4 no impact under this criterion.

5
6 **Operation and Maintenance**

7 During operations, the amount of solid waste generated by the proposed project would be similar
8 to that associated with ongoing operations and maintenance at the existing facilities. The applicant
9 would continue to comply with all federal, state, and local statutes pertaining to solid waste during
10 operations. Therefore, impacts under this criterion would be less than significant during
11 operations.

12
13 **Impact PSU-9: Result in interruption of utilities and cause a substantial adverse impact.**

14
15 **Construction**

16 *LESS THAN SIGNIFICANT WITH MITIGATION*

17 Proposed construction activities would require ground disturbing activities in several work areas.
18 Pursuant to California Government Code Sections 4216–4216.9, the applicant would contact the
19 Underground Service Alert of Southern California at least two working days prior to conducting
20 excavation activities for any component of the proposed project within a public right-of-way.

21
22 As previously discussed, construction of the proposed project would require the removal of an
23 existing MWD 72-inch pipeline, which currently bisects the proposed Mesa Substation site in a
24 north-south direction and crosses Potrero Grande Drive. The removal of this pipeline without an
25 agreement to replace the waterline would result in the interruption of utilities to a portion of the
26 MWD’s service area. The lack of water supply could result in a significant effect to critical services
27 such as fire protection and hospitals. To ensure the water service is not interrupted by the
28 construction of the Mesa Substation, MM PS-1 requires that SCE reach a relocation agreement with
29 MWD prior to construction of the proposed project. This relocation agreement would ensure that
30 MWD customers do not experience inadequate water service. Impacts would be less than
31 significant with mitigation.

32
33 In order to loop in the existing Goodrich–Laguna Bell 220-kV Transmission Line to Mesa Substation,
34 a line outage would be required, which would result in electrical outages within the City of
35 Pasadena. However, the proposed project would involve the installation of a steel pole structure
36 and conductor to temporarily connect the Eagle Rock–Mesa 220-kV Transmission Line to Goodrich
37 Substation and provide a second line of service to the City of Pasadena during this outage.

38
39 Other minor planned outages would be required during conductor and cable stringing. These
40 outages would be short term and temporary. Furthermore, critical services, such as hospitals, have
41 backup electricity for outage situations. The minor temporary disruptions would therefore not
42 result in a significant impact.

1 **Operation and Maintenance**

2 *NO IMPACT*

3 Operation and maintenance activities of the proposed project would not require any expected
4 interruptions to utilities services. Therefore, there would be no impact under this criterion during
5 operations.

6
7 **4.12.4 Mitigation Measures**

8
9 **MM PS-1: Relocation Agreement with ~~Municipal~~ Metropolitan Water District.** Prior to
10 construction that would take the MWD's 72-inch Middle Feeder Pipeline out of service, the
11 applicant shall reach an agreement with the MWD that will identify an alternate alignment that
12 crosses the project site. This relocation agreement will enable the MWD to maintain reliable
13 deliveries of treated water to its member agencies during relocation of the pipeline. SCE shall
14 submit to the CPUC information from the MWD confirming that relocation of the pipeline will not
15 result in inability to adequately serve customers. SCE shall submit this documentation at least 30
16 days prior to the pipeline being taken out of service.

17

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