



RESOLUTION NO. _____

BOARD LETTER APPROVAL

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Senior Assistant General Manager
Water System

Aram Benyamin (Aug 23, 2024 09:50 PDT)

ARAM BENYAMIN
Chief Operating Officer

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CEO and Chief Engineer

DATE: August 8, 2024

SUBJECT: Adoption of the Headworks Site Development Project Mitigated Negative Declaration in Accordance with the California Environmental Quality Act

SUMMARY

This resolution is to fulfill the LADWP's responsibilities under the California Environmental Quality Act (CEQA) prior to implementation of the Headworks Site Development Project (Project).

The proposed Project is comprised of three individual components: a new Water Quality Laboratory (WQL) with state-of-the-art testing technology to replace the existing facility currently located in Pasadena, a Direct Potable Reuse (DPR) Demonstration Facility to determine the feasibility of treating recycled water and purifying to potable standards on a large scale, and development of a Restoration Park on top of the Headworks West Reservoir in addition to ancillary recreational connections to Griffith Park. Project will improve LADWP's ability to effectively test, and continue to provide, the highest quality water for customers, determine the feasibility of advanced water purification technology, and provide public learning opportunities and recreational spaces for residents and visitors in Los Angeles. The total Project is estimated to cost \$271,000,000 (budgeted) over the planning, design, and construction timeline, through Fiscal Year (FY) 2024-2025 to FY 2027-2028 for the Restoration Park, through FY 2026-2027 to FY 2029-2030 for WQL, and through FY 2029-2030 to FY 2030-2031 for the DPR Demonstration Facility.

City Council approval is not required.

RECOMMENDATION

It is recommended that the Board of Water and Power Commissioners adopt the attached Resolution authorizing adoption of the Initial Study/Mitigated Negative Declaration (IS/MND) and approve Project for the purposes of CEQA.

ALTERNATIVES CONSIDERED

Restoration Park

Alternative locations and layouts of the Restoration Park were considered at the Headworks complex. LADWP had previously considered the installation of a wetlands area in collaboration with the United States Army Corps of Engineers, which would have been located west of the existing West Reservoir, resulting in the concrete reservoir being fully buried like the East Reservoir. However, the currently proposed park layout was chosen as the alternative, which provides sufficient space for the proposed WQL and DPR demonstration facility on the Headworks grounds, focuses on achieving the goals that are outlined in the Los Angeles River Master Plan for a Headworks Park, and allows the west façade of the West Reservoir to remain unburied to showcase the technological and engineering achievement of the reservoir.

Water Quality Laboratory

Alternative 1 (Do Nothing Alternative): This alternative would keep the existing WQL in Pasadena. Laboratory staff within each group continues to increase which further reduces the gross area per person and may cause additional safety concerns. At this time, due to lack of space, the laboratory cannot add additional instrumentation which will be needed in the next few years. The existing WQL currently has ongoing issues regarding airflow, air quality, temperature and moisture control, energy costs, and parking restrictions. As a result, constant maintenance will be required, and the maintenance costs will continue to increase for the existing lab. In addition, the facility was not designed to house the specific laboratory functions that are currently being operated at this location. Due to the inability to expand the building space and the need for continuous maintenance, this alternative was not selected.

Alternative 2 (Retrofit Existing WQL): This alternative would retrofit the existing WQL. The work would include seismic and structural upgrades to the building, electrical upgrades, Heating, Ventilation, and Air Conditioning renovations, plumbing upgrades, and existing elevator modernization to comply with the California Building Code. In addition, there would be reconfiguration of the laboratory spaces and office cubicles to accommodate increased staff and instruments. During construction, a temporary staging area and relocation of both office and laboratory personnel and instruments would be required. This alternative does not solve the parking restrictions, meet the project objective to provide standard space requirements for the laboratory instruments, bring the laboratory back to the Los Angeles service area, nor provide a centralized reporting location for WQL personnel and field collectors. Therefore, this alternative was not selected.

Alternative 3 (Construct a New WQL Building at the Headworks Site): This alternative would construct a new approximately 100,000 square feet laboratory building, site infrastructure, landscaping, perimeter security fencing, and provide parking for staff, department vehicles, and visitors. Alternative 3 was ultimately selected and will allow sufficient space for work areas and equipment, provide a centralized reporting location for field sample collectors within the Los Angeles service area, enable efficient adjacency among laboratories and office spaces, and accommodate parking needs. The final building layout will house laboratories, offices, conference rooms, and landscaped courtyards.

Direct Potable Reuse Demonstration Facility

No alternatives to developing a DPR Demonstration Facility were considered, as the technology must be tested prior to the potential implementation of DPR. However, alternative locations were considered for the development of this facility and ultimately rejected. The Tom LaBonge Headworks Water Complex was decided upon due to the following beneficial reasons: LADWP retains an easement on the land parcel for operations and infrastructure improvements, the nearby Los Angeles River provides a convenient means of discharging purified water during the testing phase, and an existing recycled water conveyance line is located nearby to facilitate access to a recycled water source. Additionally, should the technology prove viable, access to the large Headworks reservoirs provides an opportunity to blend the treated and purified water.

FINANCIAL INFORMATION

The total Project is estimated to cost \$271,000,000. The breakdown of Project component cost and duration is included below. The Restoration Park is estimated to cost \$35,000,000 over the planning, design, and construction timeline, through Fiscal Year (FY) 2024-2025 to FY 2027-2028. WQL is estimated to cost \$189,000,000 over the planning, design, and construction timeline, through FY 2026-2027 to FY 2029-2030. The DPR Demonstration Facility is estimated to cost \$47,000,000 over the planning, design, and construction timeline, through FY 2029-2030 to FY 2030-2031. The above costs are associated with materials, equipment, and labor throughout design and construction. Funding is budgeted in the Water Fund.

BACKGROUND

The Headworks Spreading Grounds property has historically been a source for water extraction, storage, and distribution for the City of Los Angeles, associated with the adjacent Los Angeles River and the San Fernando Groundwater Basin. The property was acquired by the City of Los Angeles (City) in 1899 to serve as the “headworks” for its water distribution system by extracting groundwater from beneath the adjacent Los Angeles River. The property was used for over a century for water capture and storage, including development of infiltration galleries to extract groundwater in the early 20th century, and utilizing an inflatable dam in the 1950s to redirect river flows into the spreading grounds.

In 2012, construction began on what is now known as the Tom LaBonge Headworks Water Complex. The Tom LaBonge Headworks Water Complex replaced the storage capacity provided by the uncovered Silver Lake Reservoir Complex, which was removed from service to comply with updated United States Environmental Protection Agency water quality regulations. The East Reservoir was completed in 2015, and the West Reservoir was completed in 2022. The reservoirs, which have a combined storage capacity of 110 million gallons (MG), are located in the eastern portion of Headworks, and occupy approximately half the property. While soil embankments have been built up around the above-grade walls of the reservoirs, the west facade of the West Reservoir remains exposed to showcase the technical and engineering achievement of the reservoir's construction.

LADWP proposes to develop three facilities within its existing Tom LaBonge Headworks Water Complex. The facilities would include a WQL, a DPR Demonstration Facility, and a public park (Headworks Restoration Park), which are the components of the Headworks Site Development Project. The purpose of WQL is to replace the existing obsolete LADWP laboratory facility, which is in the City of Pasadena. The purpose of the DPR Demonstration Facility is to test various water purification technologies for treating recycled wastewater to help the City meet the goal to recycle all its wastewater for beneficial reuse by 2035. The purpose of Headworks Restoration Park is to provide recreational access and educational opportunities regarding local ecosystems and water use. The proposed Project would also include roads interior to the Headworks property, surface parking for staff and visitors, landscaping, and security lighting and fencing where required. These new facilities would enhance LADWP's ability to effectively test, and continue to provide, the highest quality water for customers, test the feasibility of advanced water purification technology, and provide public learning opportunities and recreational spaces for residents and visitors in Los Angeles.

ENVIRONMENTAL DETERMINATION

PUBLIC REVIEW

Determine item is exempt pursuant to CEQA Guidelines Section 15070-15075. In accordance with this section, it was determined that the proposed Project would not have a significant effect on the environment with the incorporation of mitigation measures; therefore, an IS/MND has been prepared.

- IS/MND was made available for a 30-day public review period from April 25, 2024, through May 28, 2024.
- Copies of IS/MND were available for review at the LADWP Corporate Environmental Affairs Division and on the LADWP website.
- The notice was published as a legal notice in the *Los Angeles Times* on Thursday, April 25, 2024.
- The Notice of Intent to Adopt a Mitigated Negative Declaration was mailed to appropriate agencies, interested parties, and a list of California Native American Tribes provided by the Native American Heritage Commission.

- During the public review period, a total of five comment letters were received. One comment letter was received after the public review period closed and was incorporated into the comment log.

Letter Number	Agency/Organization/Individual	Letter Date
1	Department of Water Resources	May 22, 2024
2	South Coast Air Quality Management District	May 24, 2024
3	California Department of Transportation	May 28, 2024
4	Office of Councilmember Nithya Raman – CD 5	May 28, 2024
5	Forest Lawn Memorial-Parks & Mortuaries	May 28, 2024
6	Los Angeles Department of Recreation and Parks	June 24, 2024

While written responses to comments (RTC) on a proposed IS/MND are not required by CEQA, the RTC document is provided to demonstrate LADWP's careful consideration of the comments received. These responses provide LADWP's good faith and reasoned analysis on the major environmental issues raised in the comments. Commenters were directly responded to in writing. Comment letters and RTC are included as an attachment.

TRIBAL CONSULTATION

In accordance with LADWP's CEQA Assembly Bill 52 Policy, tribal consultation was conducted per Public Resources Code 21080.3.1. Consultation invitation letters were sent to eight tribes, based on a list of California Native American tribes provided by the Native American Heritage Commission. Consultation proceeded with responding tribes and a discussion of tribal cultural resources informed the environmental document. Consultation was completed with the adoption of mitigation measures.

- Two California Native American tribes, the Fernandeno Tataviam Band of Mission Indians and Gabrielino Tongva Indians of California, have requested formal consultation pursuant to Public Resources Code section 21080.3.1. In response, LADWP initiated the consultation process with tribal representatives, which included a discussion of the level of environmental review, potential adverse impacts to tribal cultural resources, development of an appropriate tribal monitoring plan, and the invitation of a Native American monitor to be present during ground-disturbance activities. LADWP has accommodated these requests in mitigation measure MM-TCR-1, as described in the enclosed IS/MND.

CITY ATTORNEY

The Office of the City Attorney reviewed and approved the Agreement and Resolution as to form and legality.

ATTACHMENTS

- Resolution
- Project Map
- Notice of Intent
- *Los Angeles Times* Legal Posting
- IS/MND and Appendices
- Errata, Comment Letters, and Responses
- Mitigation Monitoring and Reporting Program