3: Approach to Analysis

3.1 Introduction

Southern California Gas Company has filed an application seeking approval to decommission and sell their Montebello Gas Storage Facility (MGSF). As described in Section 2, the MGSF decommission includes recovery and sale of cushion gas, abandonment of wells, removal of equipment and demolition of buildings. Following decommissioning, all remaining land assets would be sold.

Implementation of the project actions could generate direct and indirect environmental effects on and around the project area in portions of the cities of Montebello and Monterey Park. The project actions may create opportunities that would be expected to generate indirect or secondary connected actions that would not otherwise occur if the MGSF continued in operation or was "moth-balled." Some effects would result from the proposed project while others may be related to the cumulative and final effects of the conversion of the MGSF to urban development. The structure of the Application and of the project actions is such that some "other actions" could conceivably occur but cannot be reasonably expected or assessed.

The general approach of the environmental assessment is conservative and assumes reuse of the MGSF properties under current land use regulations. The analysis reflects the uncertainty and possibilities involved in the proposed actions and their long-term effects.

3.2 Baseline Condition

The MGSF currently operates under a variety of permits granted to SCG and the facility by various public agencies as noted in Table 2.5-3 in Section 2. Over the years that SCG has operated the facility the level of operation (injection and recovery of natural gas) has

fluctuated to respond to market conditions. For the purposes of this analysis the baseline condition is assumed to be the currently permitted levels of operation. These current permits allow for operation of the MGSF for the storage of natural gas, which includes:

- Injection and recovery of natural gas
- Operation and maintenance of all existing wells, including the drilling of new wells and the abandonment of existing wells
- Operation and maintenance of all MGSF facilities
- Periodic facility and equipment upgrading

It is these existing baseline conditions that serve as the point of beginning for analysis of the proposed project. The analysis presented in this Initial Study evaluates the net change from these conditions to conditions that could exist following decommissioning and sale of the MGSF.

3.3 Project Actions

The proposed project actions would be expected to generate direct effects on the environment of Montebello and Monterey Park (e.g., truck traffic, demolition noise, noise and odors related to well abandonment, etc.).

RECOVERY AND SALE OF CUSHION GAS

As indicated in Section 2, SCG proposes to recover a large volume of storage gas ("cushion gas") in the deep gas Storage Zone of the West Montebello Oil Field. Such recovery would render the Storage Zone largely unusable for storage by others at a later date. A remote possibility exists that some oil production could be continued but may not be reasonably valuable commercially unless oil prices increased substantially above recent highs.

DECOMMISSIONING OF THE MGSF

Recovery of the cushion gas and elimination of future gas storage capability in the West Montebello Field would effectively eliminate any usefulness for the MGSF as a gas utility asset. The Application originally requested approval for gas retrieval and decommissioning of the MGSF either by SCG or by others. Although the current Settlement does not specifically require closure and decommissioning of the MGSF, the approval of the gas recovery would lead directly to these activities including decommissioning of the MGSF, abandonment of wells, and sale of the property to others.

SALE OF MGSF ASSETS

Sale of the MGSF assets is the final step in the proposed project and may be conducted in several different ways. At present, the expected method after approval would be to auction the equipment, materials, and lands with some structural assets to the public with a minimum of practical limitations and liabilities.

RELATIONSHIP TO PROJECT DESCRIPTION

The proposed actions are a part of the project described in the Project Description (Section 2). The environmental impact of the cushion gas recovery, decommissioning and sale are considered in the Initial Study (Section 4).

3.4 Connected Actions

BASIS FOR DEFINING CONNECTED ACTIONS

Purpose of Analysis of Connected Actions

Project descriptions under CEQA are required to account for reasonably foreseeable future phases, or other reasonably foreseeable consequences of proposed projects. A two pronged test to identify reasonably foreseeable projects requires that an EIR must include an analysis of an action if: "(1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will likely change the scope or nature of the initial project or its environmental effects." (Laurel Heights Improvement Association of San Francisco, Inc. v. Regents of the University of California, 1988).

Three major project actions would cause some direct changes in activities on the MGSF lands. Once the initial activities of the project are successfully underway or completed, very different incentives and conditions would be formed in Montebello and Monterey Park, which in turn would generate connected actions and effects.

Connected actions are considered to be those indirect or secondary actions and related effects which:

- Would not be expected if the project was not approved and conditions continued as at present ("permitted operation levels");
- Would reasonably be expected to arise if the project is approved and implemented successfully ("decommissioned facility"); or
- Reflect surrounding environmental and practical opportunities and constraints ("urban context")

POSSIBLE CONNECTED ACTIONS

A range of possible actions could occur if SCG decommissions and sells the MGSF. These actions may be induced by the decommissioning and sale; some of the induced effects could result in physical changes to the environment.

The possible connected actions include:

- Development of the MGSF properties in accordance with current land use regulations
- Development of the MGSF properties at densities and intensities greater than currently allowed by land use regulations
- Continued oil and gas operations
- Other utility operations

Development of the MGSF Properties in Accordance with Current Land Use Regulations

Following decommissioning of the MGSF it is assumed that the asset sale (land) will be to individuals and entities that are interested in redeveloping the properties for urban uses. Land use regulation authorities for the various MGSF properties are held by the cities of Montebello and Monterey Park. Development of the properties requires review and approval by the respective cities prior to issuance of entitlement and use permits.

Currently, the cities have imposed land use regulations that allow for development densities and intensities that are less than those of adjacent developed properties. Development of the properties in a form consistent with current land use regulations is considered a reasonably foreseeable connected action of the MGSF decommissioning and sale. This Initial Study evaluates development of the properties a this manner, which would allow for a total of 22 new single family homes on the MGSF properties within the City of Montebello and development of a small industrial / manufacturing / service commercial use on the Monterey Park Lots.

Development of the MGSF Properties at Densities and Intensities Greater than Currently Allowed by Land Use Regulations

While development of the MGSF properties consistent with the current land use regulations is a reasonably foreseeable connected action, so too is development of the properties at a density and intensity other than that allowed by the current regulations.

There is a prospect that future owners of MGSF lands may seek changes to land use regulations to allow a greater intensity of development. Presented on the following pages is a brief evaluation of the range of effects that might result from an increase in allowed land use to a level comparable to that of developed surrounding properties. This evaluation is focused on the Main Facility and East Site. The Townsite lots are now zoned for single-family development and they are of a size that would not be expected to offer an increased development potential. As such they are evaluated for their maximum development potential in Section 3.

The three larger sites (Main Facility, East Site, and the small triangular parcel in Monterey Park) currently have General Plan and Zoning Ordinance designations significantly different from their surrounding lands. Development of these properties at par with their surroundings would require General Plan and Zoning Ordinance amendments.

Representatives of the City of Montebello Planning Department indicated that amendment of the current land use regulations to allow a greater development potential might be favorably received (Pace, Tonya, December 5, 2000). A representative of the City of Monterey Park indicated that a draft General Plan Update designates the two Monterey Park Lots for open space uses. Any General Plan amendment requires a significant public review process, including consideration of potential environmental consequences consistent with provisions of CEQA.

A brief discussion of the possible consequences of an intensified urban development on the MGSF properties is presented later in this Section.

CONTINUED OIL/GAS OPERATIONS

The degassing of the deep Storage Zone 8 in the West Montebello Field can be considered to be the practical end of the MGSF and to commercially viable oil production. Compaction of the Storage Zone during gas withdrawals over a 5-year period would reduce the capability of the zone to receive, store, and return gas in the future. Some consideration has been given to the possibility of continued oil production from the higher “Shallow Zones”; these zones have yielded less than 100 bbl / day of oil and 1,000,000 cf of gas / day in the past.

The change in predominate activities from gas storage to oil production would require approvals and new permits from DOGGR and the City of Montebello. The City may not allow the major MGSF sites to be used for oil production amongst residential properties.

As a distinct operation and separate from the economic benefits from gas storage activities, oil production from the West Montebello Field would most likely not be commercially viable and would require some form of secondary recovery as practiced at the main Montebello Field, east of Montebello Boulevard. Secondary oil production could be attempted with fewer wells than used for gas storage and monitoring, but MGSF wells would require substantial modifications in order to produce from the Storage and Shallow Zones of the field. Secondary recovery in the Shallow Zones could increase risks of gas escaping to the ground surface and could endanger existing and future development. The recovery would require significant effort and expense to control the oil recovery process and assure safety above the recovery area.

Oil production could eventually prove economically viable at much higher oil prices, but production could be accomplished using fewer existing wells along with some additional facilities in the adjacent oil field areas east of Montebello Boulevard. Such development has occurred in the older Long Beach and Los Angeles fields where secondary systems lie within dense urban areas. The only known explosion and injuries resulting from ground gases in Los Angeles occurred over the Salt Lake Oil Field, where secondary recovery was conducted.

Although oil or gas development would be theoretically possible and may eventually be practical, the development would be similar in character and effects to that of the proposed project. A field operator would remove most (if not all) equipment and reduce available commercial reserves of oil and gas to those that were present when SCG took over the field in the mid 1950s after production by oil/gas operators. In order to recover the highest financial returns, useable lands would be sold off for urban development and as few wells as possible for production and secondary operations would be utilized.

Continued oil/gas operations at the MGSF are therefore not reasonably foreseeable. The impacts of this scenario are therefore not described in this Initial Study.

OTHER UTILITY OPERATIONS

Options for future development do exist for the proposed project's connected actions, including open space and recreational uses for some lots and light commercial uses for others. Once the MGSF has been decommissioned, the two large parcels would be available for future land development. The Main Facility and East Site have several opportunities which could allow markedly different, more intense land uses: large size of the parcels, their connections to gas and water networks, and their proximity to major power networks north of the OII Landfill. The Montebello Special Use Permit for utility purposes could be retained for future utility use by public or private entities; the question would arise as to what utility or public service uses would be consistent with the conditions of the special use permit and the surrounding urban and environmental conditions. The intense land uses could be very different from the existing or more probable residential land uses: power plant, water or wastewater plant, solid waste processing plant, etc. The Main Facility (MF) contains somewhat different opportunities

than those of the East Site (ES) along Montebello Boulevard, and the preliminary review of these sites suggested the possibilities of:

- Large water supply storage or sewage treatment plant (MF/ES)
- 100-200 MW gas-fuelled power plant (MF/ES)
- Solid waste transfer station and materials recovery facilities (ES)
- Public maintenance yards and warehouses (ES)
- Commercial transport-haulage and warehouse (ES)

As with petroleum production, other alternative locations for such utility/services uses exist in more industrial or less residential areas of Montebello and Monterey Park. The East Site could be developed for utility/services uses more easily than the Main Facilities, but from a practical and market approach, the value of the lands for residential uses appears to outweigh those values for public utilities and services. The impacts of this scenario are therefore not described in this Initial Study.

LEVEL OF ASSESSMENT

The approach in the Initial Study has focused on programmatic assessments and, where possible, identification of specific effects. Assessment of effects does not preclude future assessments by other agencies when specific projects are submitted for discretionary review and action. This programmatic review can assist others in their assessment of both the general effects and more specific effects.

This Initial Study analyzes in detail the connected action of development in accordance with current land use regulations. Development at densities greater than or different than current zoning is discussed as a possible connected action in this section only, due to the following issues:

- Timing
- Nature of development
- Need for additional discretionary review by other agencies

3.5 Review of Environmental Effects of Alternative Urban Development

INTRODUCTION FOR FUTURE DEVELOPMENT

Decommissioning of the MGSF would be expected to create few adverse effects. The future development of the lands held under the MGSF can be reasonably expected to be developed in a manner consistent with existing land use regulations. Under current land use regulations a maximum of 22 single family homes could be developed on the 22 existing lots that comprise the MGSF properties within the City of Montebello. The two Monterey Park lots would, under current land use regulations, be developed with a small industrial/manufacturing/service commercial use.

For the purposes of this evaluation, a forecast of potential changes to the General Plans of the cities of Montebello and Monterey Park has been made, as follows:

- Main Facility – 28 acres of the Main Facility site would be developed at an overall, average density of 4.5 units per acre, consistent with adjacent General Plan land use designations
- East Site - the entire 11 acre site would be developed at an overall, average density of 4.5 units per acre, consistent with adjacent General Plan land use designations
- Monterey Park Parcels – the site would not be developed for urban uses purposes and would remain "as-is" (informal open space) or be developed for utility purposes (e.g., water tanks, substation, etc.)

The result of this forecast would be the development of approximately 175 single-family homes. During the review of the project and review of future development prospects, several environmental sectors are considered to experience little or no adverse environmental effects or would not yield different conclusions than for the proposed project, including:

- Agriculture
- Biological Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation

Primary environmental topics of concern for environmental effects include:

- Aesthetics
- Air Resources
- Cultural Resources
- Hydrology and Utilities / Services
- Transportation and Traffic

The following review follows the same general format of Section 4, and references to "Checklist Questions" reflect those used in checklists for individual sectors in Section 4.

Environmental settings for the individual sectors are provided in Section 4, and only important features may be referenced below.

Where environmental effects are considered important, prospective measures for reducing effects are recommended for consideration in the future by other appropriate agencies which would be expected to have discretionary authority over the development of the MGSF lands.

The following discussion is predicated on an evaluation of a potential change in land use regulations and a development proposal that would not be expected to be formally filed for review for at least 5 years from the date that MGSF decommissioning begins. The discussion is based on a snapshot of conditions as they exist today. The environment of Montebello and Monterey Park in the context of baseline environmental conditions, regulatory provisions and community expectations will most certainly evolve over the course of the next five years.

AESTHETICS

Development of the MGSF properties at densities or intensities greater than currently allowed will result in a greater number of residential units on the properties and in the case of the Monterey Park Lots there would be no development of buildings for non–open space uses. That change will result in a changed aesthetic for the properties than would be expected under current development limits.

Effects of Intensified Urban Development

Disruption of the Montebello Boulevard vistas could arise from the earthwork and construction on the East Site. No existing screening trees exist along the western road margin, and the site is in full view of the major arterial. The most probable grading plan would slope the site from the westerly crests to the Montebello Boulevard levels.

Development at the larger Main Facility site could be less noticeable than that of the East Site as the existing landscaping and elevation differences reduce direct views onto the property.

Future development would cause changes to the MGSF sites arising after the sale of lands to the new owner(s) and their development for residential uses. The most significant changes from existing visual conditions to an intensified urban development would be at the East Site where a somewhat natural setting would be changed to residential development. Intensified residential development of the Main Facility would also change the remaining natural setting to urban development.

Future development of residential communities and lots would add street and building-related lighting to the areas. Lighting and glare from development of the East Site would fill-in lighting along the entire western side of the Montebello Boulevard frontage from Lincoln to Montebello Town Center. It would be expected that lighting levels would be comparable to existing urban levels in the area. Similarly, light and glare generated by development of the Main Facility site would only fill-in existing glare generation and not add as significantly as that of the East Site.

Prospective Measures for Intensified Development

To mitigate changed vistas of the site consideration should be given to the installation of landscape screening along the properties' edges to soften vistas of the site from off-site vantage points.

AIR RESOURCES

Effects of Intensified Urban Development

Intensified urban development of the MGSF properties could result in an increase in sources of air pollution, with the principal source being construction equipment during construction activities and vehicles after construction. With intensified urban development there would also be the introduction of greater numbers of sensitive receptors to the area that would be exposed to the increase emissions.

According to SCAQMD guidelines, the current operational air quality threshold criteria for residential development is 200 homes. The intensified urban development scenario does not reach the threshold, but is close to it warranting careful consideration if such a proposal should be forth coming.

Types of pollutants released during the development phase would differ greatly from current MGSF operations and the expected emissions during decommissioning. Hydrocarbon vapors, sulfurous gases, and some NO_X emissions would be replaced by vehicular emissions of higher levels of $PM_{2.5-10}$, CO, hydrocarbons, and NO_X. Potential development of 175 dwellings would generate about 175 AM commuter trips and about 1,750 average daily trips (ADT) in the local Montebello area.

Intensification of development potential on the MGSF properties will result in an increased contribution to air emissions from both construction activities and post construction activities (motor vehicles). The intensification may not generate significant emission levels local, but will add to the cumulative South Cast Air Basin air shed. As noted, the current SCAQMD threshold for new residential development is 200 units so by those current standards a significant effect would not result. At the time a more intense urban development may be proposed it will be necessary to evaluate the proposal with standards in place at the time to determine a level of significance. Cumulatively, an intensified urban development will contribute to the challenge of the SCAQMD in meeting its plan for attainment of federal clean air standards.

Intensification of urban uses on the MGSF properties will increase the number of sensitive receptors to local and regional air emissions and pollutants.

During construction an intensified urban development will present the opportunity to increase construction related air emissions including dust and exhaust fumes.

Prospective Measures for Intensified Development

The City may want to explore with the proponent for development of the MGSF properties opportunities to incorporate transit features into project design. These could include a park-and-ride lot or a bus stop.

CULTURAL RESOURCES

Effects of Future Development

Once decommissioning has taken place, the MGSF sites could be developed for urban uses. Such development could involve forms of land disturbances that may reach greater depths than previously experienced on the lands (especially the East Site). The new forms

of land disturbances could create a potential for encountering previously undisturbed, unknown archaeological resources.

Future development of the MGSF would be expected to have little significant impact on historical resources. Some effects may occur to historic-aged debris of the 1920-1940s in the vicinity of the older oil wells during building construction on the East Site and some Townsite Lot sites.

Future development on the Main Facility site and East Site could require earthwork and could encounter archaeological resources in previously undisturbed areas.

Future earthworks on the Main Facility and East Site could be expected directly or indirectly to encounter unique paleontological resources or unique geologic features. The highest potential for encounters exist at the Main Facility where potentially fossiliferous materials are at the surface and have not been buried by other fills or destroyed by typical soil processes.

Urban development of the MGSF may encounter fossils immediately below the existing ground surfaces, while deeper excavations on the East Site and some Townsite Lots may be sufficient to reach natural, geological formations containing fossils.

No burials are expected in the MGSF sites and therefore no effects are anticipated. Any encounter with human remains under any conditions requires immediate suspension and determination of the remains and their origins.

Prospective Measures for Future Development

Any substantial earthwork in the MGSF lands should be monitored. Earthwork in areas of undisturbed soils should be evaluated by a qualified archaeologist before earthwork begins and monitored during earth-moving activities.

As indicated above, paleontological resources would most likely be encountered in the old quarry floor and walls of the Main Facility, and measures should include surveying and monitoring of earthwork areas and activities of the Main Facility site and similar bedrock exposures in the East Site. Measures and related activities during decommissioning would provide the basis for review of development activities after decommissioning and future disposition of the MGSF sites. Results during decommissioning should be reviewed by a qualified paleontologist to determine if future protective measures are required. Measures recommended by the paleontologist should be implemented.

GEOLOGICAL RESOURCES

Effects of Future Development

Anticipated future development of the MGSF Project sites would eventually add housing, other supporting development, and infrastructure systems to the area. Such development would result in increased human occupancy and exposure to potentially adverse geological conditions.

Migration of Subsurface Gas to the Surface

Storage gas has traveled to the surface through leaking wells or geologic pathways; evidence exists for past conditions and no evidence exists to exclude such in the future

with absolute certainty. Even if no leaks are detected from all known wells, no evidence exists that leaks could not develop at an undetermined future time. In addition, undocumented abandoned wells or dry holes in the Project vicinity could provide potential vertical gas migration pathways to the ground surface and structures.

Potential effects are associated with exposure of populations and structures to an accumulation of soil gas in residential areas. Soil gas can accumulate inside or under buildings or infrastructure systems and pose threats of fire or explosion. Various methods exist for detection and removal of soil gas, thus minimizing the potential for accumulation inside structures even when present in considerable levels. Without control measures, this gas accumulation would result in a significant adverse impact.

Increasing populations and improvements in areas with past histories of gas migration creates increased risk of damaging events.

Prospective Measures for Future Development

No new mitigation measures are necessary for the development of new construction on the MGSF sites. Existing regulations will govern the preparation, submittal, and approval of development plans, grading plans, and tract maps. Prior to the sale and transfer of the MGSF and subsequent parcelization, the primary goal shall be to demonstrate that each site is free of surface and shallow gas. The primary means to accomplish this should be field ground gas and well testing, and if gas is present, safe removal and disposition of the vented gas in perpetuity. Effects of such gas migration are deemed a potentially significant adverse effect that can be mitigated to less than significant levels. As such, measures should be undertaken prior to, during, and perhaps after the transfer of MGSF assets.

Prospective Measures (Intermediate)

Immediate measures may be required (See Section 4) to ascertain the composition and origins of surface gas releases, to determine the most probable pathways for releases to the surface, and to monitor near-surface gas releases. Such determinations are required over the entire Storage Zone and area of influence. Problem areas may be identified and a remediation program to safely remove the gas will be established during or even before transfer and later development. As the current operations and storage conditions should have stabilized after the period of inactivity, a baseline condition can be established

Storm drains often act as collectors for natural gas due to their shallow embedment and open construction. A survey methodology should be established and peer reviewed to assure adequacy of geographic coverage and appropriateness of methods.

Soil gas survey testing should be conducted on a grid over the entire Storage Zone and individually for each parcel in the proposed project to determine the presence or absence of soil gas. Where gas is determined to be from the Storage Zone a monitoring program should be established and the pathway for release of the gas should be determined. An independent expert should review the monitoring program procedures in advance to determine the adequacy of the program. In addition, all monitoring records should be reviewed to delineate any possible gas leaks in the area identified by the testing program.

Well and Field Documentation and Circulation

Well information contained in SCG files should be reviewed and provided to the subsequent owner(s) of those lots within 100 ft of any well.

For well sites where storage gas is detected, problem areas could be identified and a remediation program to safely remove the gas should be established.

Appropriate remedial actions could be implemented if soil gas surveys, routine monitoring programs, or evaluation of well data identified any leaking or potential problem wells. These measures could include re-abandonment of leaking wells, drilling and installation of shallow gas recovery wells, construction of gas collection and venting systems, or other approaches as needed.

Transfer Measures

Transfer measures are required to implement approved plans to remove any known or suspected escaping near-surface or well gases from the sale parcels and development. The Michael Collins Circle program may be one such program, although the precise details of removal (e.g., wells versus trenches) may vary depending upon the nature and extent of the release, as well as underlying geologic material. All systems should be documented, reviewed, and approved by the regulating agencies in order that building permits can be issued following transfer of ownership. Special assessment districts for gas venting may be required for larger parcels if gas is suspected.

In some cases, passive soil gas collection may be adequate. In other cases, vacuum extraction is required, such as neighborhoods like Michael Collins Circle where extraction systems require collection manifolds and extensive piping.

Transfer measures are required to legally document the responsibilities of the parties following the transfer. In particular, documents should define who retains responsibility for maintaining and operating the field-testing, monitoring, and remediation sites and equipment. The transfer documents should also prescribe necessary indemnification and insurance requirements (if any) for the buyers and seller.

Prospective Measures for Future Development

Based on terms and condition set for in the property transfer documents, the responsibilities of the parties could be defined upon execution of sales contracts. The responsible parties could maintain and operate field test stations, monitoring stations, and remediation site equipment. The transfer documents should also prescribe necessary indemnification and insurance requirements (if any) for the buyers and seller.

HYDROLOGY, UTILITIES, AND SERVICES

Effects of Future Development

Future urban development of the MGSF lands could increase storm runoff, the demand for potable water, the demand for collection and treatment of wastewater and further reduce groundwater basin recharge..

Hydrology

Intensified urban development of the MGSF properties will result in increased impervious surfaces over the current development potential outlined by the General Plan. The increase in impervious surfaces will result in greater storm water flows from the properties; which flows must be accommodated in the City's storm water collection system. The storm water collection and disposal system is a region-wide system and its ability to accept additional storm water flows from the project site will need to be evaluated at the time a specific development proposal is presented to the City for review. In addition to increased storm water flows, intensified urban development will reduce opportunities to recharge area groundwater basins. Further, increased impervious surfaces will increase the potential for introduction of pollutants to the area's watercourses and water bodies, with a focus on pollutants associated with motor vehicles.

Utilities

Intensified urban development of the MGSF sites will incrementally increase the demand for wastewater collection and treatment facilities. The City of Montebello has indicated that wastewater collection systems in the vicinity of the MGSF Main Facility and East Site are at or near capacity and may not be able to accommodate significant increased flows from the project sites. At this time the City has indicated that there are no plans for increasing capacities of the area's existing collection systems.

Collectively, increased storm water flows and increased generation of wastewater appears to be the two most significant hydrology, utilities and service effects that would result from increased urban development.

Prospective Measures for Future Development

The City should consider the area's capacity to accommodate additional storm water flows from the project area. If existing system capacity is inadequate consideration should be given to on-site measures including construction of a retention basin, limiting impervious surfaces, requiring the use of pervious paving materials and limiting building footprints. In addition to addressing system capacities regard storm water collection and disposal, minimizing increased storm water flows from the site will allow some continued recharge of the area's groundwater basin.

The proponent for a development that exceeds the then existing capacity of the wastewater collection system may be required to increase the system's capacity, or alternatively, to explore options to reduce project wastewater flows.

Measures for reducing effects for both water-related and associated utilities/services effects can be combined by intercepting storm water flows to recharge the groundwater table while avoiding discharges to the storm drain systems..

NOISE

Effects of Future Development

Intensified urban development of the MGSF properties will result in an increase in vehicular traffic, and in turn an increase in traffic related noise. Within the largely

developed urban environment of Montebello the increase would be expected to be relatively minimal.

Prospective Measures for Future Development

During the course of project review for an intensified development proposal the City should consider conducting site-specific noise assessment to define ambient noise levels at the time of development. Depending on the City's adopted noise standards at the time consideration may be warranted for construction of a sound mitigation wall between the intensified development and adjacent roadways and incorporation of additional sound mitigation materials in the homes.

TRANSPORTATION AND TRAFFIC

Effects of Future Development

Intensified urban development of the MGSF sites will increase the sites' trip generation potential over levels now anticipated by the General Plan, and will also incrementally add to traffic movements on adjacent roadways.

Construction and operations of future developments have focused on residential construction and activities for the two main MGSF sites: the Howard Avenue corridor for the Main Facility and the Jefferson Boulevard corridor for the East Site, assuming no direct access would be provided to Montebello Boulevard. A total of almost 40 ac could be developed for residential uses and support of 175 homes. Construction of 175 homes on the Main Facility site and East Site could increase morning commute congestion on the Howard-Jefferson corridor and intersections due to inbound construction workers, materials deliveries and the outbound commuting residents.

The increase in commuter traffic onto the Howard-Jefferson corridor and the two major intersections could degrade turnings on those intersections, increase congestion (reduce LOS), and increase accident rates, especially for the left-turn outbound traffic onto Montebello Boulevard. Using typical generation factors of 10 trips per day per household and 10% for peak-hour, development of the MGSF lands would generate an increase of 1,750 average daily trips (ADT) to the overall local traffic and 175 peak-hour trips during the morning commute.

These issues should be addressed by future development plans for the two sites and by the City of Montebello during their environmental review of future planned urban development for the sites. The types of mitigation could vary depending on the development proposal.

Commuter traffic could be generated on both Jefferson and Howard and could only exit from the area at the Jefferson / Montebello Boulevards and Howard / Lincoln intersections. The Jefferson / Montebello intersection has a higher capacity and would be affected by only 50 additional peak hour trips, while the Howard corridor and the Howard / Lincoln intersection has less capacity and currently experiences delays and congestion.

The Jefferson / Montebello and Sonora / Jefferson intersections (within less than 400 ft) could be affected somewhat by increased entry traffic from the south side of Jefferson with right-turns followed by an immediate lane change for the left turn onto Montebello. The combination of turnings and lane changes during the morning commute could increase

the hazards to traffic circulation in this area. In addition, the arrangement of the north and south entry of Sonora onto Jefferson creates potential conflicts between the turning traffic; little traffic crosses Jefferson.

Similarly, current turning congestion and risks could be increased at the Sandy Rock-Texcoco / Howard intersection only 300 ft north of the Howard / Lincoln intersection.

Because of current congestion, various intersection measures have been undertaken in the past. Few additional measures can be incorporated to these intersections for both decommissioning and future development effects. The significant effects on the Howard corridor and lesser effects on the Jefferson corridor can be mitigated to less than significant levels.

Prospective Measures for Future Development

At the time a proponent files a specific proposal with the City for review, the City should conduct a project specific traffic study to identify current traffic volumes and turning movements for the purpose of identifying required system improvements or enhancements. Among the system improvements that may be warranted are:

- Dedicated turn pockets
- Merge lanes
- Deceleration lanes
- Additional travel lanes
- Modification of overall roadway system traffic controls

3.6 No Project Alternative

Denial of the SCG Application and Settlement for the MGSF would result in continuation of the current status of the facilities and lands. Most of the cushion gas would remain within the Storage Zone. Continuation of the current status would not require abandonment or decommissioning of any facilities or equipment and would require low levels of activities related to monitoring equipment and field pressures and maintaining equipment in good condition. SCG would resume operation at any time to produce the existing gas.

Continuing Storage Zone pressures at current levels may require some periodic removal of oil and water from the zone and would require monitoring and controls of gas pressures in the overlying Shallow Zones.

3.7 Conclusions

The scenarios identified as reasonably foreseeable in the above evaluations are analyzed in Chapter 4 of this document. The scenarios identified as reasonably foreseeable are:

- Decommissioning and sale of the MGSF
- Development of 22 single family homes on the Montebello properties
- Development of a small industrial / manufacturing / service retail development on the Monterey Park Lots