APPENDIX A.3 NOP PUBLIC COMMENTS

		Subject and Draft EIR Section																	
NOTICE OF PREPARATION SUMMARY OF COMMENTS 1100 E. 5 th Street Project State and Regional Agencies and De		IV.A. Air Quality	IV.B. Cultural Resources	IV.C. Geology and Soils	IV.D. Greenhouse Gas Emissions	IV.E. Hazards and Hazardous Materials	IV.F. Hydrology and Water Quality	IV.G. Land Use and Planning	IV.H. Noise	IV.I. Population and Housing	IV.J. Public Services	IV.K. Transportation/Traffic	IV.L. Tribal Cultural Resources	IV.M. Utilities and Service Systems	IV.N. Energy Conservation	VI. Alternatives	VII. Effects Not Found to be Significant	Other	Explanation of "Other"
State of California, Governor's Office of Planning and Research. State Clearinghouse and Planning Unit	Part																	•	Section I (Introduction). The Lead Agency has complied with State Clearinghouse requirements for the NOP.
State of California, Native American Heritage Commission			•										•						
South Coast Air Quality Management District		•			•											•			
County and City Agencies and Departme	ents																_		
City of Los Angeles Bureau of Sanitation Wastewater Engineering Services Division							•							•					
Organizations and Individuals																			
Carpenters Contractors Cooperation Committee, Boris Gresely																		•	Requests information regarding the status of the project.
Chun Wu Wang Farmland Imports Inc.				•		•						•							Submitted two identical letters (email and hard copy).
Claude and Nancy Kent				•				•											

State of California, Governor's Office of Planning and Research. State Clearinghouse and Planning Unit

The Lead Agency has complied with State Clearinghouse requirements for the NOP. No substantial comments to be addressed in EIR analysis.

State of California, Native American Heritage Commission

The NAHC explains the tribal consultation requirements under AB 52 and SB 18. They also suggest mitigation measures that could be used to reduce impacts, if needed. In addition, they discuss the requirements for an archaeological resources survey and recommend mitigation measures if needed.

South Coast Air Quality Management District

The SCAQMD recommends that the Lead Agency use their CEQA Air Quality Handbook (1993) when preparing the air quality analysis for the EIR. They request that all air quality modeling files be sent to them.

The SCAQMD explains the methodology and analyses that they expect to see in the EIR air quality analysis. They suggest guidance for developing mitigation measures, alternatives to the project, and their role as a responsible agency.

City of Los Angeles Bureau of Sanitation Wastewater Engineering Services Division

The Wastewater Division explains the projected wastewater for the project and the sewer infrastructure availability to handle the project flows. The letter also explains stormwater requirements during and after construction of the project.

Last, the letter also discusses the requirements for a recycling area within the project.

Carpenters Contractors Cooperation Committee, Boris Gresely

Requests information regarding the status of the project. The City replied to their request.

Chun Wu Wang, Farmland Imports Inc.

Mr. Wang lists four questions regarding (1) the proposed excavation and proximity to his property line, (2) the proposed shoring system and impact on his property, (3) sidewalk width and pedestrian traffic, and (4) vehicle traffic and the intersection of Seaton and 5th Street.

Claude and Nancy Kent

Claude and Nancy Kent are concerned about the consistency of the proposed project with the existing manufacturing land uses and the historic character of the area. They are also concerned about the proposed density.



STATE OF CALIFORNIA Governor's Office of Planning and Research State Clearinghouse and Planning Unit



Notice of Preparation

February 26, 2018

To:

Reviewing Agencies

Re:

1100 E. 5th Street Project

SCH# 2018021069

Attached for your review and comment is the Notice of Preparation (NOP) for the 1100 E. 5th Street Project draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Will Lamborn Los Angeles Department of City Planning 200 N. Spring Street, Room 750 Los Angeles, CA 90012

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely

Scott Morgan

Director, State Clearinghouse

RECEIVED CITY OF LOS ANGELES

MAR 1 6 2018

MAJOR PROJECTS UNIT

Attachments cc: Lead Agency

Document Details Report State Clearinghouse Data Base

SCH# 2018021069

Project Title 1100 E. 5th Street Project Lead Agency Los Angeles, City of

Type NOP Notice of Preparation

Description The project proposes the demolition of three vacant warehouse buildings and surface parking, and the

construction of an up to 247,000 sf mixed use building containing up to 220 live/work units and approx 22,725 sf of open space for residents, up to 44,530 sf of commercial uses, and associated parking facilities providing approx 342 parking spaces and approx 288 bicycle parking spaces. The proposed building would be up to 110 ft (8 levels) tall and would include a three-level subterranean parking

structure.

Lead Agency Contact

Name Will Lamborn
Agency City of Los Angeles

Phone 213-978-1470

email

Address 200 N. Spring Street, Room 750

City Los Angeles

State CA Zip 90012

Fax

Project Location

County Los Angeles

City Los Angeles, City of

Region

Cross Streets E. 5th St & Seaton St

Lat / Long 34° 2' 28.57" N / 118° 14' 13.46" W

Parcel No. 5163-024, 009, -014

1 arcer 140. 0105-024, 00

Township 1S Range 13W Section 34 Base SBBM

Proximity to:

Highways I-10, US 101, I-5, SR 60

Airports

Railways Red/Purple/Gold Metro

Waterways LA River
Schools various LAUSD

Land Use warehouse land use/M3-1-RIO/heavy industrial designation

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Cumulative Effects; Drainage/Absorption;

Economics/Jobs; Flood Plain/Flooding; Geologic/Seismic; Growth Inducing; Landuse; Minerals; Noise;

Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer

Capacity; Social; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation;

Vegetation; Water Quality; Water Supply; Other Issues

Reviewing Resources Agency; Office of Historic Preservation; Department of Parks and Recreation; Department of Fish and Wildlife, Region 5; Native American Heritage Commission; Public Utilities Commission;

Santa Monica Bay Restoration; State Lands Commission; California Highway Patrol; Air Resources Board, Major Industrial Projects; State Water Resources Control Board, Division of Drinking Water; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 4; Baldwin

Hills Conservancy; Caltrans, District 7

Date Received 02/26/2018

Start of Review 02/26/2018

End of Review 03/27/2018

Note: Blanks in data fields result from insufficient information provided by lead agency.

CEQA Coordinator



William Lamborn < william.lamborn@lacity.org>

SCH# 2018021069 1100 E. 5th Street

NAHC <NAHC@nahc.ca.gov>Reply-To: NAHC@nahc.ca.gov
To: william.lambom@lacity.org

Wed, Feb 28, 2018 at 2:51 PM

Reply to: NAHC <NAHC@NAHC.ca.gov>

Device Name: Not Set Device Model: MX-4141N Location: Not Set

File Format: PDF (Medium) Resolution: 200dpi x 200dpi

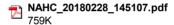
Attached file is scanned image in PDF format.

Use Acrobat(R)Reader(R) or Adobe(R)Reader(R) of Adobe Systems Incorporated to view the document.

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NATIVE AMERICAN HERITAGE COMMISSION

Environmental and Cultural Department 1550 Harbor Blvd., Suite 100 West Sacramento, CA 95691 Phone (916) 373-3710



February 28, 2018

William Lamborn Los Angeles Department of City Planning 200 North Spring Street, Room 750 Los Angeles, CA 90012

Sent via e-mail: William.lamborn@lacity.org

RE: SCH# 2018021069; 1100 E. 5th Street Project, City of Los Angeles; Los Angeles County, California

Dear Mr. Lamborn:

The Native American Heritage Commission has received the Notice of Preparation (NOP) for Draft Environmental Impact Report for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000 et seq.), specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines Section 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared. (Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd. (a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code § 21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment (Pub. Resources Code § 21084.2). Please reference California Natural Resources Agency (2016) "Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form,"

http://resources.ca.gov/ceqa/docs/ab52/Clean-final-AB-52-App-G-text-Submitted.pdf. Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code § 21084.3 (a)). AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015. If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). Both SB 18 and AB 52 have tribal consultation requirements. If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. § 800 et seq.) may also apply.

The NAHC recommends lead agencies consult with all California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments. Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - **c.** Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code § 21080.3.1 (d)).
 - **d.** A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code § 21073).
- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code § 21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. (Pub. Resources Code § 21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18). (Pub. Resources Code § 21080.3.1 (b)).
- 3. <u>Mandatory Topics of Consultation If Requested by a Tribe</u>: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code § 21080.3.2 (a)).
- 4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - **c.** Significance of the project's impacts on tribal cultural resources.
 - **d.** If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code § 21080.3.2 (a)).
- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code § 21082.3 (c)(1)).
- 6. <u>Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:</u> If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code § 21082.3 (b)).

- 7. <u>Conclusion of Consultation</u>: Consultation with a tribe shall be considered concluded when either of the following occurs:
 - a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - **b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code § 21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code § 21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code section 21084.3 (b). (Pub. Resources Code § 21082.3 (e)).
- **10.** Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
 - a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - **ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - **b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
 - **c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d. Protecting the resource. (Pub. Resource Code § 21084.3 (b)).
 - e. Please note that a federally recognized California Native American tribe or a nonfederally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code § 815.3 (c)).
 - **f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code § 5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An environmental impact report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
 - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
 - **b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code § 21082.3 (d)).

This process should be documented in the Cultural Resources section of your environmental document.

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires **local governments** to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code § 65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

- 1. <u>Tribal Consultation</u>: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe. (Gov. Code § 65352.3 (a)(2)).
- 2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
- 3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code section 65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction. (Gov. Code § 65352.3 (b)).
- **4.** Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
 - **a.** The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - **b.** Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

- 1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have been already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
- 2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - **a.** The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.

- **b.** The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.
- 3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - **b.** A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
- 4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - **b.** Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

Please contact me if you need any additional information at gayle.totton@nahc.ca.gov.

Sincerely,

Gayle Totton, M.A., PhD.

Associate Governmentał Program Analyst

(916) 373-3714

cc: State Clearinghouse

SENT VIA USPS AND E-MAIL:

March 27, 2018

William.lamborn@lacity.org
William Lamborn
City of Los Angeles, Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Notice of Preparation of Environmental Impact Report for the 1100 E. 5th Street Project (ENV-2016-3727-EIR)

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Environmental Impact Report (EIR). Please send SCAQMD a copy of the EIR upon its completion. Note that copies of the EIR that are submitted to the State Clearinghouse are not forwarded to SCAQMD. Please forward a copy of the EIR directly to SCAQMD at the address shown in the letterhead. In addition, please send with the EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files¹. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, SCAQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.

Air Quality Analysis

SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from SCAQMD's Subscription Services Department by calling (909) 396-3720. More guidance developed since this Handbook is also available on SCAQMD's website at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993). SCAQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

SCAQMD has also developed both regional and localized significance thresholds. SCAQMD staff requests that the Lead Agency quantify criteria pollutant emissions and compare the results to SCAQMD's CEQA regional pollutant emissions significance thresholds to determine air quality impacts. SCAQMD's CEQA regional pollutant emissions significance thresholds can be found here: http://www.aqmd.gov/docs/default-

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¹ Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf. In addition to analyzing regional air quality impacts, SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by SCAQMD staff or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis.

In the event that the Proposed Project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: http://www.arb.ca.gov/ch/handbook.pdf. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Guidance² on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF.

Mitigation Measures

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project, including:

• Chapter 11 of SCAQMD's CEQA Air Quality Handbook

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² In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's Air Quality and Land Use Handbook: A Community Health Perspective. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: https://www.arb.ca.gov/ch/landuse.htm.

- SCAQMD's CEQA web pages available here: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies
- SCAQMD's Rule 403 Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 Asbestos Emissions from Demolition/Renovation Activities
- SCAQMD's Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86): http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf

Alternatives

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a "no project" alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities

Since the Proposed Project would include demolition of a 35,000-square-foot warehouse and 23,000 square feet of parking, asbestos may be encountered during demolition. As such, SCAQMD staff recommends that the Lead Agency include a discussion to demonstrate compliance with SCAQMD Rule 1403 in the EIR.

Permits

In the event that the Proposed Project requires a permit from SCAQMD, SCAQMD should be identified as a responsible agency for the Proposed Project. For more information on permits, please visit SCAQMD webpage at: http://www.aqmd.gov/home/permits. Questions on permits can be directed to SCAQMD's Engineering and Permitting staff at (909) 396-3385.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available at SCAQMD's webpage at: http://www.aqmd.gov.

SCAQMD staff is available to work with the Lead Agency to ensure that project air quality impacts are accurately evaluated and any significant impacts are mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov or call me at (909) 396-3308.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

LS LAC180223-05 Control Number

CITY OF LOS ANGELES

INTER-DEPARTMENTAL CORRESPONDENCE

DATE:

March 27, 2018

TO:

Vincent P. Bertoni, Director of Planning

Department of City Planning

Attn:

William Lamborn, City Planner Department of City Planning

FROM:

Ali Poosti, Division Manager for

Wastewater Engineering Services Division

LA Sanitation

SUBJECT:

1100 E. 5^{TH} STREET PROJECT - NOTICE OF PREPERATION OF

ENVIRONMENTAL IMPACT REPORT AND PUBLIC SCOPING

MEETING

This is in response to your February 23, 2018 letter requesting a review of the proposed mixed-use project located at 1100 E. 5th Street, 506-530 S. Seaton Street, Los Angeles, CA 90013. The project will consist of residential, retail, and commercial use. LA Sanitation has conducted a preliminary evaluation of the potential impacts to the wastewater and stormwater systems for the proposed project.

WASTEWATER REQUIREMENT

LA Sanitation, Wastewater Engineering Services Division (WESD) is charged with the task of evaluating the local sewer conditions and to determine if available wastewater capacity exists for future developments. The evaluation will determine cumulative sewer impacts and guide the planning process for any future sewer improvement projects needed to provide future capacity as the City grows and develops.

Projected Wastewater Discharges for the Proposed Project:

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Proposed No. of Units	Average Daily Flow (GPD)		
Existing		<u></u>			
Warehouse	30 GPD/1000 SQ.FT	35,000 SQ.FT	(1,050)		
Proposed					
Residential:APT-1bdrm	110 GPD/UNIT	191 UNITS	21,010		
Residential:APT-2 bdrm	150 GPD/UNIT	28 UNITS	4,200		
Residential:APT-3bdrm	190 GPD/UNIT	1 UNITS	190		
Spa/Jacuzzi	Backwash Filter Flow		500		
(Commercial with					
Backwash Filters)					
Swimming Pool	Backwash Filter Flow		500		
(Commercial with					
Backwash Filters)					
Retail Area (less than	25 GPD/1000 SQ.FT	9,250 SQ.FT	231		
100,000 SF)					
Bar: Cocktail, Public	720 GPD/1000 SQ.FT	19,609 SQ.FT	14,118		

File Location: CEQA Review\FINAL CEQA Response LTRs\FINAL DRAFT\1100 E. 5th Street Project - NOP.of EIR and Public Scoping Meeting.doc

Table Area			
Commercial Use	50 GPD/1000 SQ.FT	15,671 SQ.FT	784
	40,483		

SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes an existing 8-inch line on Seaton St. The sewage from the existing 8-inch line feeds into a 12-inch line on Palmetto St before discharging into a 22-inch sewer line on Alameda St. Figure 1 shows the details of the sewer system within the vicinity of the project. The current flow level (d/D) in the 8-inch line cannot be determined at this time without additional gauging.

The current approximate flow level (d/D) and the design capacities at d/D of 50% in the sewer system are as follows:

Pipe Diameter (in)	Pipe Location	Current Gauging d/D (%)	50% Design Capacity		
8	Seaton St.	*	256,391GPD		
12	Palmetto St.	0.72	740,652 GPD		
15	Palmetto St.	1.70	969,149 GPD		
22	Alameda St.	*	3.09 MGD		
22	Alameda St.	0.44	3.09 MGD		

^{*} No gauging available

Based on recent gauging and the estimated flows, it appears a number of conveyance lines within this tributary system may be reaching their design capacity. As a result, the conveyance lines may need to be up-sized to accommodate the additional flow from the project. If the conveyance lines are increased, the sewer system might be able to accommodate the total flow for your proposed project. Further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time. Ultimately, this sewage flow will be conveyed to the Hyperion Water Reclamation Plant, which has sufficient capacity for the project.

If you have any questions, please call Christopher DeMonbrun at (323) 342-1567 or email at chris.demonbrun@lacity.org.

STORMWATER REQUIREMENTS

LA Sanitation, Watershed Protection Program (WPP) is charged with the task of ensuring the implementation of the Municipal Stormwater Permit requirements within the City of Los Angeles. We anticipate the following requirements would apply for this project.

POST-CONSTRUCTION MITIGATION REQUIREMENTS

In accordance with the Municipal Separate Storm Sewer (MS4) National Pollutant Discharge Elimination System (NPDES) Permit (Order No. R4-2012-0175, NPDES No. CAS004001) and the City of Los Angeles Stormwater and Urban Runoff Pollution Control requirements (Chapter VI, Article 4.4, of the Los Angeles Municipal Code), the Project shall comply with all mandatory provisions to the Stormwater

1100 E. 5th Street Project – NOP of EIR March 27, 2018 Page 3 of 4

Pollution Control Measures for Development Planning (LID Ordinance) and as it may be subsequently amended or modified. Prior to issuance of grading or building permits, the Applicant shall submit a LID Plan to the City of Los Angeles, Bureau of Sanitation, Watershed Protection Division (WPD), for review and approval. The LID Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.

Current regulations prioritize infiltration, capture/use, and then biofiltration as the preferred stormwater control measures. The relevant documents can be found at: www.lacitysan.org. It is advised that input regarding LID requirements be received in the early phases of the project from WPD's plan-checking staff.

GREEN STREETS

The City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-away to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. The goals of the Green Street elements are to improve the water quality of stormwater runoff, recharge local ground water basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration systems, biofiltration swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways and can be implemented in conjunction with the LID requirements. Green Street standard plans can be found at: www.eng2.lacity.org/techdocs/stdplans/

CONSTRUCTION REQUIREMENTS

All construction sites are required to implement a minimum set of BMPs for erosion control, sediment control, non-stormwater management, and waste management. In addition, construction sites with active grading permits are required to prepare and implement a Wet Weather Erosion Control Plan during the rainy season between October 1 and April 15. Additionally, construction sites that disturb more than one-acre of land are subject to the NPDES Construction General Permit issued by the State of California, and are required to prepare, submit, and implement the Storm Water Pollution Prevention Plan (SWPPP).

If there are questions regarding the stormwater requirements, please call WPP's plan-checking counter at (213) 482-7066. WPD's plan-checking counter can also be visited at 201 N. Figueroa, 3rd Fl, Station 18.

GROUNDWATER DEWATERING REUSE OPTIONS

The Los Angeles Department of Water and Power (LADWP) is charged with the task of supplying water and power to the residents and businesses in the City of Los Angeles. One of the sources of water includes groundwater. The majority of groundwater in the City of Los Angeles is adjudicated, and the rights of which are owned and managed by various parties. Extraction of groundwater within the City from any depth by law requires metering and regular reporting to the appropriate Court-appointed Watermaster. LADWP facilitates this reporting process, and may assess and collect associated fees for the usage of the City's water rights. The party performing the dewatering should inform the property owners about the reporting requirement and associated usage fees.

On April 22, 2016 the City of Los Angeles Council passed Ordinance 184248 amending the City of Los Angeles Building Code, requiring developers to consider beneficial reuse of groundwater as a

1100 E. 5th Street Project – NOP of EIR March 27, 2018 Page 4 of 4

conservation measure and alternative to the common practice of discharging groundwater to the storm drain (SEC. 99.04.305.4). It reads as follows: "Where groundwater is being extracted and discharged, a system for onsite reuse of the groundwater, shall be developed and constructed. Alternatively, the groundwater may be discharged to the sewer."

Groundwater may be beneficially used as landscape irrigation, cooling tower make-up, and construction (dust control, concrete mixing, soil compaction, etc.). Different applications may require various levels of treatment ranging from chemical additives to filtration systems. When onsite reuse is not available the groundwater may be discharged to the sewer system. This allows the water to be potentially reused as recycled water once it has been treated at a water reclamation plant. If groundwater is discharged into the storm drain it offers no potential for reuse. The onsite beneficial reuse of groundwater can reduce or eliminate costs associated with sewer and storm drain permitting and monitoring. Opting for onsite reuse or discharge to the sewer system are the preferred methods for disposing of groundwater.

To help offset costs of water conservation and reuse systems, LADWP offers the Technical Assistance Program (TAP), which provides engineering and technical assistance for qualified projects. Financial incentives are also available. Currently, LADWP provides an incentive of \$1.75 for every 1,000 gallons of water saved during the first two years of a five-year conservation project. Conservation projects that last 10 years are eligible to receive the incentive during the first four years. Other water conservation assistance programs may be available from Metropolitan Water District of Southern California. To learn more about available water conservation assistance programs, please contact LADWP Rebate Programs 1-888-376-3314 and LADWP TAP 1-800-544-4498, selection "3".

For more information related to beneficial reuse of groundwater, please contact Greg Reed, Manager of Water Rights and Groundwater Management, at (213)367-2117 or greg.reed@ladwp.com.

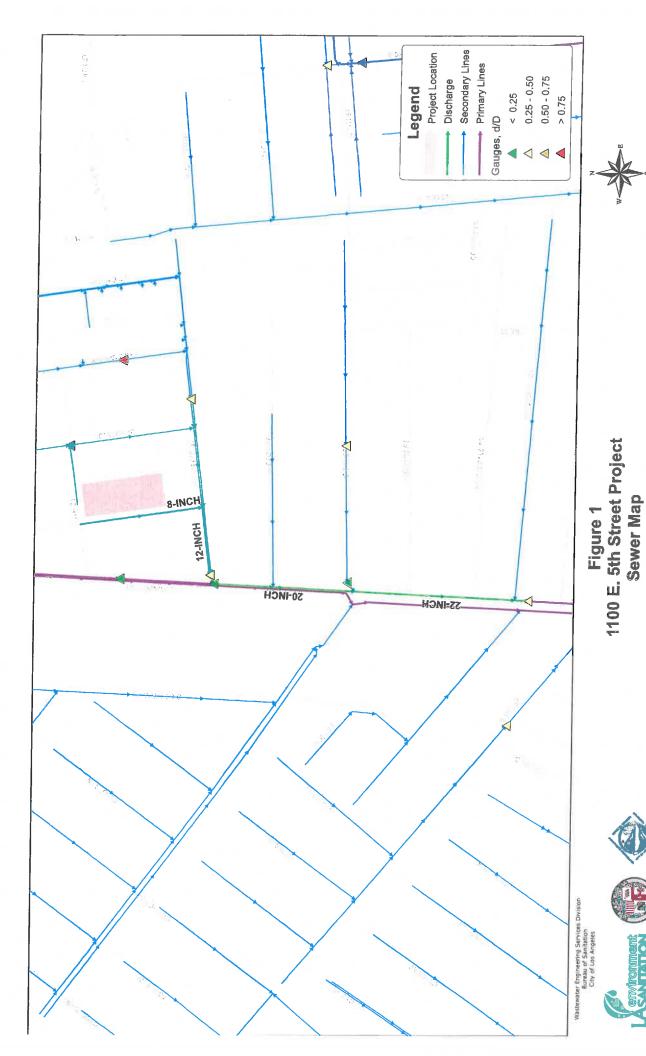
SOLID RESOURCE REQUIREMENTS

The City has a standard requirement that applies to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onsite recycling activities. For more details of this requirement, please contact LA Sanitation Solid Resources Recycling hotline 213-922-8300.

CD/AP: mg

Attachment: Figure 1 – Sewer Map

c: Kosta Kaporis, LASAN Christopher DeMonbrun, LASAN



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Thomas Brother Data reproduced with permission granted by THOMAS BROS MAP



William Lamborn < william.lamborn@lacitv.org>

Project Inquiry

Create

2 messages

Boris Gresely <pre

To: "william.lamborn@lacity.org" <william.lamborn@lacity.org>

Fri, Mar 2, 2018 at 10:51 AM

Dear William Lamborn,

I hope this email finds you well.

Allow me to e-introduce myself, my name is Boris Gresely and I'm writing on behalf of the Carpenters/Contractors Cooperation Committee (C/CCC).

The C/CCC is a labor-management cooperation committee established pursuant to the federal labor Management Cooperation Act of 1978 and supports the enforcement of labor laws in the construction industry.

Simply put, we are an organization committed to promoting quality good paying construction jobs through our labor compliance activities. As such, we would like to inquire about the current status of Case #: CPC-2016-3689-GPAJ-ZCJ-HD-MCUP-DB-SPR (676 South Mateo Street Project) & CPC-2016-3726-GPAJ-VZCJ-HD-MCUP-ZAA-DB-SPR (1110 E 5th Street Project).

I hope to hear from you soon!

Sincerely,

Boris Gresely

Public Affairs Representative

Carpenters/Contractors Cooperation Committee

533 S Fremont Avenue. Suite 510

Los Angeles CA, 90071

Tel: 213-718-3116

William Lamborn < william.lamborn@lacity.org> To: Boris Gresely

Fri, Mar 2, 2018 at 1:50 PM

Hi Boris,

Both of these projects are currently in the environmental review phase, pursuant to the California Environmental Quality Act (CEQA). An Initial Study for each project was released on February 23, 2018. Please see links below to access those documents. We are currently in the 30-day Notice of Preparation public comment period. Following the this public comment period, a Draft Environmental Impact Report will be prepared for each project.

https://planning.lacity.org/eir/nops/676_Mateo_Street/nop.pdf https://planning.lacity.org/eir/nops/676_Mateo_Street/InitialStudy.pdf

1100 E. 5th:

https://planning.lacity.org/eir/nops/1100_E_5th_street/nop.pdf https://planning.lacity.org/eir/nops/1100_E_5th_street/InitialStudy.pdf

Regards,

Will Lamborn

[Quoted text hidden]



William Lamborn Major Projects Department of City Planning 200 N. Spring Street, Rm 750

Ph: 213.978.1470

Please note that I am out of the office every other Friday.



William Lamborn < william.lamborn@lacity.org>

RE: Safety Concerns CASE NO. ENV-2016-3727-EIR

Farmland Imports, Inc. <farmlandimports@sbcglobal.net> To: william.lamborn@lacity.org

Tue, Mar 6, 2018 at 10:25 AM

Dear Mr. William Lamborn,

I, Chun Wu Wang, am the property owner of 1168 E. 5TH STREET and I am writing this in regards to the proposed **1100 E. 5th Street Project**, **CASE NO. ENV-2016-3727-EIR**. As an adjacent neighbor to this proposed project, my concerns and requests are as follows:

- 1. The proposed three-level subterranean parking is deep, possibly 30' or more. Will the proposed setback provide sufficient distance from my property line?
- 2. I request for full details regarding the underground shoring system along our neighboring property line, especially during excavation. The reassurance that our property is being protected is my biggest concern and I would request for more transparency on this matter.
- 3. The amount of pedestrian foot traffic has increased dramatically with the recent improvements and developments in the surrounding neighborhood. Due to this, I believe the current "existing" sidewalk should be expanded to 15', not 10', to better accommodate for this ever increasing surge in foot traffic.
- 4. With the proposed construction of a subterranean parking lot there will also be increased auto traffic. I would further suggest installing a 4-way stop sign at the Seaton and 5th Street intersection.

Thank you for taking the time to read some of my concerns. My hope is that these requests would not only help to alleviate some of my concerns I have for my own property but also to offer suggestions to improve upon our existing neighborhood into the future.

Best Regards,

Chun Wu Wang

(213) 621-2929 - work

(213) 422-0959 - cell

March 6, 2018

To:

William Lamborn
Department of City Planning
200 N Spring Street, Room 750, Los Angeles, CA 90012
FAX: 213-978-1470

From:

Chun Wu Wang Farmland Imports Inc. 1168 E 5th Street, Los Angeles, CA 90013 TEL: 213-621-2929

RE: Safety Concerns CASE NO. ENV-2016-3727-EIR

Dear Mr. William Lamborn,

I, Chun Wu Wang, am the property owner of 1168 E. 5TH STREET and I am writing this in regards to the proposed **1100 E. 5th Street Project**, **CASE NO. ENV-2016-3727-EIR**. As an adjacent neighbor to this proposed project, my concerns and requests are as follows:

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Best Regards, Chun Wu Wang (213) 621-2929 - work (213) 422-0959 - cell



William Lamborn < william.lamborn@lacity.org>

Environmental Case No: ENV-2016-3727-EIR

Claude Kent <indrevolution@sbcglobal.net>
Reply-To: Claude Kent <indrevolution@sbcglobal.net>
To: William Lamborn <william.lamborn@lacity.org>

Tue, Mar 27, 2018 at 3:10 PM

Claude and Nancy Kent 442 Colyton St. Los Angeles, CA 90013 213 210-6372 indrevolution@sbcglobal.net

March 27, 2013

William Lamborn
City of Los Angeles, Department of City Planning
200 N. Spring St. Room 750
Los Angeles, CA 90012
William.lamborn@lacity.org

Re: Case No: ENV-2016-3727-EIR 1100 E. 5th Street Project

Dear Mr. Lamborn,

We are writing to let you know that we think the project listed above is not consistent with the manufacturing and historic character of this area. The buildings here, which give the neighborhood its distinctive look, hence its popularity as a downtown destination, are conversions not new construction.

Because they are converted buildings, the density is lower than it would be if it were a newly developed downtown core. If you allow projects such as this one, that character would be obliterated.

Thank you, Claude and Nancy Kent