Initial Study/Mitigated Negative Declaration

St. Andrews Place Demolition Project

Los Angeles Department of Water and Power
Environmental Affairs
111 North Hope Street, Room 1044
Los Angeles, California 90012

November 2020

CEQA Initial Study and Mitigated Negative Declaration

St. Andrews Place Demolition Project

November 2020

General Manager
Marty L. Adams

Senior Assistant General Manager
Water System
Richard F. Harasick

Director of Environmental Affairs
Mark J. Sedlacek

Manager of Environmental Planning and Assessment
Charles C. Holloway

Prepared by
Los Angeles Department of Water and Power
111 North Hope Street, Room 1044
Los Angeles, CA 90012

Technical Assistance Provided by
ESA
626 Wilshire Blvd., Suite 1100
Los Angeles, CA 90017

COUNTY CLERK'S USE

CITY CLERK'S USE

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
PROPOSED
MITIGATED NEGATIVE DECLARATION
(Article I, City CEQA Guidelines)

LEAD CITY AGENCY:	**COUNCIL DISTRICT**
Los Angeles Department of Water and Power (LADWP) 111 North Hope Street, Room 1044 Los Angeles, CA 90012	CD No. 8 Councilmember Marqueece Harris-Dawson
PROJECT TITLE: St. Andrews Place Demolition Project	**CASE NO.**

PROJECT DESCRIPTION: The proposed project would include the demolition of an existing two-story structure and auxiliary structures on a 1.1-acre parcel owned by LADWP. Once construction is completed, the proposed project site would be used as open air storage.

PROJECT LOCATION: 6236 S. St. Andrews Place in the City of Los Angeles

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY

FINDING: See attached Initial Study for Mitigation Measures Imposed

NAME OF PERSON PREPARING THIS FORM:	**TITLE:**	**PHONE:**
Eduardo Cuevas	Environmental Engineering Associate	(213) 367-3553
ADDRESS: 111 N. Hope Street, Room 1044 Los Angeles, CA 90012	**SIGNATURE (Official)** Charles C. Holloway, Manager of Environmental Planning and Assessment	**DATE** 11-6-20

TABLE OF CONTENTS

Initial Study and Mitigated Negative Declaration for St. Andrews Place Demolition Project

Page

Section 1, Project Description 1-1
1.1 Introduction 1-1
1.2 Project Location 1-1
1.3 Project Background 1-1
1.4 Project Description 1-4
1.5 Project Construction 1-4
1.6 Operation and Maintenance Activities 1-5
1.7 Project Approvals 1-5

Section 2, Environmental Checklist 2-1
Initial Study 2-1
Environmental Factors Potentially Affected 2-2
2.1 Aesthetics 2-3
2.2 Agriculture and Forestry Resources 2-6
2.3 Air Quality 2-8
2.4 Biological Resources 2-19
2.5 Cultural Resources 2-22
2.6 Energy 2-27
2.7 Geology and Soils 2-30
2.8 Greenhouse Gas Emissions 2-35
2.9 Hazards and Hazardous Materials 2-41
2.10 Hydrology and Water Quality 2-45
2.11 Land Use and Planning 2-48
2.12 Mineral Resources 2-50
2.13 Noise 2-51
2.14 Population and Housing 2-63
2.15 Public Services 2-64
2.16 Recreation 2-66
2.17 Transportation 2-67
2.18 Tribal Cultural Resources 2-70
2.19 Utilities and Service Systems 2-73
2.20 Wildfire 2-75
2.21 Mandatory Findings of Significance 2-76

Page

Appendices

A: Air Quality, GHG, Energy Technical Report
B: Cultural Resources Reports
B.1: Archaeological Resources Assessment
B.2: Historic Resources Assessment
C: Noise and Vibration Technical Report

Figures

1 Regional Location....1-2
2 Project Location....1-3

Tables

1-1 Discretionary Permits Potentially Required 1-6
2-1 Unmitigated Maximum Daily Regional Construction Emissions (pounds per day) 2-12
2-2 Unmitigated Maximum Daily Localized Construction Emissions (pounds per day) 2-15
2-3 Estimated Project Construction Fuel Consumption 2-28
2-4 Amortized Annual Construction GHG Emissions.... 2-38
2-5 Construction Equipment and Estimated Noise Levels.... 2-54
2-6 Unmitigated Maximum Construction Noise Levels at Sensitive Receptors.... 2-56
2-7 Mitigated Maximum Construction Noise Levels at Sensitive Receptors 2-57
2-8 Vibration Source Levels for Construction Equipment 2-60

SECTION 1
Project Description

1.1 Introduction

The Los Angeles Department of Water and Power (LADWP) proposes to implement the St. Andrews Place Demolition Project (project). The proposed project would include the demolition of an existing two-story structure and auxiliary structures on a 1.1-acre parcel owned by LADWP. Once construction is complete and the site is cleared, the proposed project site would be used as open air storage. The property is located adjacent to an existing LADWP well field property that includes an area used for open air storage.

1.2 Project Location

The proposed project site is located south of downtown Los Angeles, at 6236 S. St. Andrews Place in the City of Los Angeles, as shown in **Figure 1**. The project site is bound by an existing LADWP well field property to the north, West Gage Avenue to the south, St. Andrews Place to the west, and existing industrial uses to the east. The site can be accessed through a gate on St. Andrews Place. Regional access to the project site is provided by Interstate 110 (I-110) approximately 1.7 miles east.

1.3 Project Background

The project site is composed of one parcel (Assessor's Parcel No. 6001 016 901), owned by LADWP, with a two-story structure along the western portion of the property (**Figure 2**). In addition to the two-story structure, the project site is developed with an auxiliary structure and a paved area used for parking along the eastern side of the property. A concrete wall separates the paved parking area from the property to the north. LADWP would like to expand the available storage area currently used along the northern side of the project site.

The two-story structure that will be demolished as part of the proposed project was constructed in 1928 and originally served as Bauman Brothers Furniture Manufacturing Co. (Bauman Brothers) facilities. The existing structure consists of various materials with an exterior that is mostly unreinforced masonry[1] and includes floors that are made of wood framing.

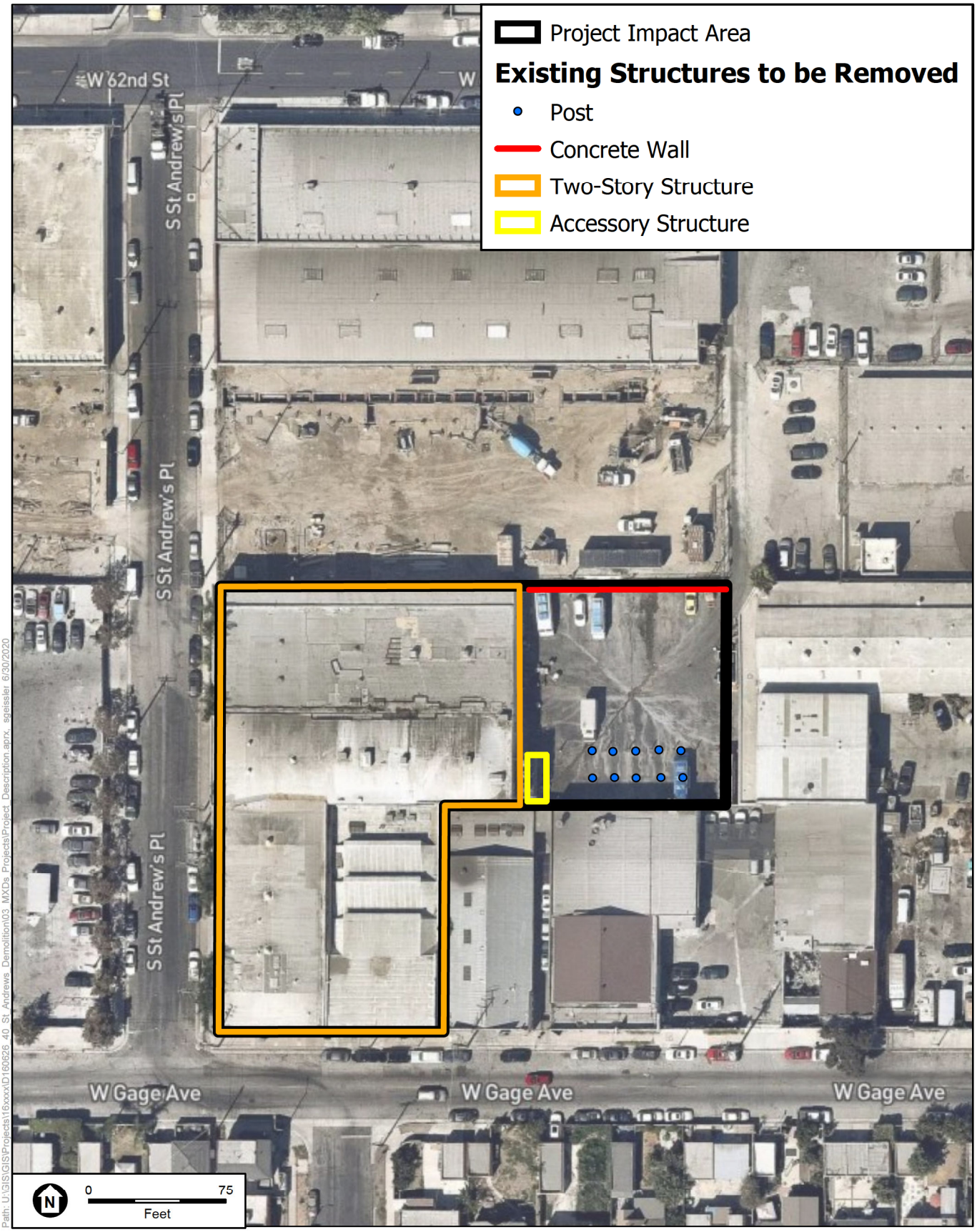
[1] Unreinforced masonry is a type of building where load-bearing walls, non-load-bearing walls, or other structures are made of brick, cinderblock, tiles, adobe, or other masonry material that is not braced by reinforcing material, such as rebar in a concrete or cinderblock.

SOURCE: Open Street Map, 2020.

St. Andrews Demolition Project

Figure 1
Regional and Project Location

ESA



SOURCE: Open Street Map, 2020.

St. Andrews Demolition Project

Figure 2
Project Site Location

ESA

1.4 Project Description

The proposed project would include the demolition of a 64,434-square-foot, 26-foot-tall, two-story structure. The structure's footprint is approximately 38,484 feet. In addition, the proposed project would remove a 456-square-foot auxiliary structure, a concrete wall along the northern property line, and 10 posts located on the paved portion of the site, which were previously used as truck charging stations. Once the site is demolished and cleared of debris, a new chain-link fence with privacy slats or other privacy cover would be constructed along the perimeter of the property. The fence would be 8 feet tall and similar to the existing chain-link fence that surrounds the adjacent LADWP well field. The fence would include posts every 10 feet and barbed wire along the top. Once all structures and posts have been removed, the existing paved parking along the eastern side of the property would remain in place and the rest of the site would be slightly graded. No additional improvements to the site would occur. The proposed project would result in a new open air storage area to supplement the adjacent storage area at the LADWP well field property.

1.5 Project Construction

Prior to proposed demolition activities, utilities related to the existing structure would be capped and hazardous materials remediation would be implemented at the project site to limit exposure to potentially toxic materials, such as asbestos-containing materials (ACMs) and lead-based paint (LBP), during demolition activities. Prior to the start of demolition activities, a Hazardous Materials Survey would be conducted to assess the types and quantities of hazardous material that may be encountered during the demolition work. After the assessment, hazardous waste would be removed and disposed of in compliance with and all federal, state, and local laws. The demolition work would commence after the hazardous waste has been properly assessed and safely removed and disposed of.

Because of the two-story structure's proximity to the sidewalk along St. Andrews Place and West Gage Avenue, barricades, protection fences, and/or canopies will be provided along the sidewalk to protect pedestrians from construction activities. No sidewalk or road closures are anticipated.

The proposed project would include mobilization and capping of utilities, hazardous materials remediation, installation of pedestrian protection and fencing, salvaging of construction materials, removal of wood framing, removal of walls, removal of foundation, backfilling and minor grading, and cleanup and removal of construction fencing.

Construction demolition waste required to be exported off-site would include approximately 1,280 cubic yards (CY) of concrete, 1,670 CY of unreinforced masonry, and approximately 1,300 CY of wood. Minor excavation would be required to remove a concrete slab and perimeter footings. The maximum depth of excavation for the footings would be no deeper than 60 inches.

All demolition debris and excavation material would be sent to 25th Street Recycling (2121 East 25th Street, Los Angeles, CA) or California Waste Services (621 West 152nd Street, Gardena, CA),

or a similar facility. All hazardous materials would be disposed of at an appropriate facility that accepts such waste.

Site access would occur via a gate located along the north side of the project site along St. Andrews Place. On average, approximately 10 workers per day would be at the project site, and up to 20 workers per day during the peak construction period, which would last approximately 3 weeks. This would result in a total of 20 worker trips per day on average and 40 worker trips per day during peak construction. Approximately 25 truck haul trips per day would occur during the heaviest period of construction.

Construction Staging

Construction staging areas and equipment and vehicle laydown areas would be accommodated within the project site's paved parking area and within the adjacent LADWP property, if needed.

Construction would require, but would not be limited to, the following equipment:

- Flatbed truck
- Light pickup truck
- Truck-mounted earth auger
- Heavy-duty trucks (2)
- Dump trucks (2)
- Crawler loader
- Air compressor
- Pavement breakers (2)
- Air hoses (2)
- Two-drum roller

Construction Schedule

The proposed project would take approximately 4.5 months to complete, which would include approximately 2 months of hazardous material remediation and 2.5 months of demolition work. Construction of the proposed project is anticipated to start in August 2021.

Construction for the proposed project would occur Monday through Friday, between the hours of 6:00 A.M. and 5:00 P.M. No nighttime construction would occur as part of the proposed project.

1.6 Operation and Maintenance Activities

Once construction is complete and the site is cleared, the project site would be used for open air storage, similar to the existing adjacent property. It is anticipated that existing LADWP staff would operate and maintain the new open air storage area similar to the current adjacent well field property. It is estimated that approximately three truck trips per week would enter/exit the storage area and 3 hours of forklift usage per week would occur at the project site.

1.7 Project Approvals

This Initial Study (IS)/Mitigated Negative Declaration (MND) has been prepared to meet all of the substantive and procedural requirements of the California Environmental Quality Act (CEQA) (California Public Resources Code Section 21000 et seq.), the State CEQA Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.). Accordingly, LADWP is the

Lead Agency for the proposed project, and **Table 1-1** summarizes the project's permit requirements from their respective agencies. This IS/MND may be used for future project approvals.

TABLE 1-1
DISCRETIONARY PERMITS POTENTIALLY REQUIRED

Agency	Permits and Authorizations Potentially Required
Regional Water Quality Control Board	• Construction General Permit • General Stormwater NPDES for Industrial Facilities
City of Los Angeles Department of Building and Safety	• Demolition permit

SECTION 2 ENVIRONMENTAL CHECKLIST
Initial Study

1.	**Project Title:**	St. Andrews Place Demolition Project
2.	**Lead Agency Name and Address:**	Los Angeles Department of Water and Power 111 N. Hope Street, Room 1044 Los Angeles, CA 90012
3.	**Contact Person and Phone Number:**	Eduardo Cuevas Environmental Engineering Associate (213) 367-3553
4.	**Project Location:**	6236 S. St. Andrews Place, Los Angeles, California 90047
5.	**Project Sponsor's Name and Address:**	Same as Lead Agency
6.	**General Plan Designation(s):**	Light Industrial (South Los Angeles Community Plan)
7.	**Zoning:**	M2 (Light Industrial)

8. **Description of Project:** (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)

   The proposed project would include the demolition of an existing two-story structure and auxiliary structures on a 1.1-acre parcel owned by Los Angeles Department of Water and Power (LADWP). Once construction is complete and the site is cleared, the proposed project site would be used by LADWP as open air storage.

9. **Surrounding Land Uses and Setting.** (Briefly describe the project's surroundings.)

   Light industrial to the north, west, and east and hybrid industrial and low residential to the south.

10. **Other public agencies whose approval is required** (e.g., permits, financing approval, or participation agreement.)

    - Regional Water Quality Control Board
    - City of Los Angeles Department of Building and Safety

11. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

    To date, one California Native American tribe has requested consultation. A consultation meeting was held on August 27, 2020. See Section 2.18 for details.

Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality
☐ Biological Resources	☒ Cultural Resources	☐ Energy
☒ Geology/Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
☐ Hydrology/Water Quality	☐ Land Use/Planning	☐ Mineral Resources
☒ Noise	☐ Population/Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resources
☐ Utilities/Service Systems	☐ Wildfire	☒ Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial study:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Nadia J Panlu for

Signature

11-6-20

Date

Charles C. Holloway, Manager of Environmental Planning and Assessment

Signature

Date

2.1 Aesthetics

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
AESTHETICS — Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒
d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?	☐	☐	☐	☒

Discussion

a) **Less than Significant Impact**. Scenic vistas are defined by the City of Los Angeles as the panoramic public view of the ocean, striking or unusual natural terrain, or unique urban or historic features. There are several scenic vistas located around the City of Los Angeles, including the San Gabriel and Santa Susana Mountains to the north, the Santa Monica Mountains that extend across the middle of the city, the Palos Verdes Hills and Pacific Ocean to the south and west, and views of the Los Angeles River throughout the city (City of Los Angeles 2001). However, the City of Los Angeles General Plan and the South Los Angeles Community Plan do not designate scenic vistas on or near the proposed project site (City of Los Angeles 2001; City of Los Angeles 2017). The nearest scenic vistas are the eastern Santa Monica Mountains located approximately 8.6 miles north of the project site. The Santa Monica Mountains can be viewed in the distance by motorists traveling north along St. Andrews Place, the north/south road at the western boundary of the project site.

During the proposed demolition, construction equipment and stockpiled materials would be visible at the project site for only a temporary amount of time. Equipment and materials would be used/stored within the LADWP property and out of the public right-of-way for the duration of construction. The proposed project would not significantly obstruct scenic vistas of the Santa Monica Mountain range from St. Andrews Place during construction. Once construction is complete and the site is cleared, the project site would be used for open space storage in compliance with Light Industrial Zone (M2) zoning regulations applicable to the project site (City of Los Angeles 2020). The M2 zoning designation allows for open storage of equipment at the project site, provided that the property is enclosed by fencing that is at least 8 feet in height and that equipment stored at the project site does not exceed the height of the fence (zoning regulations

applicable to the project site are described in detail in Section 2.11, *Land Use* (City of Los Angeles 1974). Further, since implementation of the proposed project would demolish a 26-foot-tall structure and construct an 8-foot-tall fence with privacy slats, thereby reducing the tallest structure on the project site by 18 feet, scenic views available to the public traveling north along St. Andrews Place would be improved at completion of the project compared to existing conditions. Therefore, the proposed project would not result in a substantial adverse effect on a scenic vista. Impacts are considered to be less than significant.

b) **No Impact.** There are no officially designated State Scenic Highways in the vicinity of the project site, nor are there any known scenic resources or rock outcroppings in close proximity to the project site (Caltrans 2020; City of Los Angeles 2017). As discussed in Section 2.6 (a), the Bauman Brothers industrial complex does not qualify as a historical resource and its demolition would not constitute a significant impact. Construction of the project would not include the removal of trees, rock, outcroppings, or historic buildings that are visible from State Scenic Highways. Therefore, the proposed project would not impede any views of scenic resources from State Scenic Highways.

c) **No Impact.** The project site is located in a highly urbanized area within the City of Los Angeles, and is within the South Los Angeles Community Plan area. Visually, the project site has industrial characteristics, including a two-story structure that was formerly a furniture manufacturing facility. The area surrounding the project site is visually characterized by residential, institutional, and commercial uses.

The project site is designated for Light Industrial land use in the South Los Angeles Community Plan and is zoned as Light Industrial (M2). Once the project construction is completed, the site would serve an as open air storage site, similar to the existing property to the north. This use would not conflict with applicable zoning and other regulations governing scenic quality. No impact would occur.

d) **No Impact.** The project site is located in a highly urbanized area, which receives light and glare from vehicles and streetlights during the day and night. Light and glare associated with daytime construction of the proposed project is not expected to be substantially greater than existing conditions. Construction of the proposed project would occur Monday through Friday, within the hours between 6:00 A.M. and 5:00 P.M. As construction would occur during daytime hours, no additional light sources would be introduced to the project site during construction. If nighttime lighting is required, the construction contractor would comply with the City of Los Angeles Municipal Code 41.40 nighttime lighting standards and all lighting would be shielded and pointed toward the construction activity, away from the surrounding street and sensitive land uses. Once demolition activity is complete, the site would serve as an open air storage area. No new sources of light are required or would be implemented as part of the project. No impact would occur.

References

California Department of Transportation (Caltrans), 2020. Officially Designated County Scenic Highways. Available online at: https://dot.ca.gov/-/media/dot-media/programs/design/documents/od-county-scenic-hwys-2015-a11y.pdf. Accessed on May 15, 2020.

City of Los Angeles 1974. Los Angeles Municipal Code. Section 12.19 "M2" Light Industrial Zone, Amended by Ord. no. 146,030, Eff. July 11, 1974. Available at: http://library.amlegal.com/nxt/gateway.dll/California/lapz/municipalcodechapteriplanningandzoningco/chapterigeneralprovisionsandzoning/article2specificplanning-zoningcomprehen/sec1219m2lightindustrialzone?f=templates$fn=default.htm$3.0$vid=amlegal:lapz_ca$anc=JD_12.19. Accessed May 21, 2020.

City of Los Angeles, 2001. City of Los Angeles General Plan, Conservation Element, Adopted September 2001. Available at: https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf. Accessed May 12, 2020.

City of Los Angeles, 2017. South Los Angeles Community Plan. Available at: https://planning.lacity.org/odocument/b909e749-754e-4caa-af7f-14c82adaa2b7/South_Los_Angeles_Community_Plan.pdf. Accessed May 13, 2020.

City of Los Angeles, 2020. Zone Information and Map Access System (ZIMAS). Available at: https://planning.lacity.org/zoning/zoning-map. Accessed May 13, 2020.

2.2 Agriculture and Forestry Resources

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
AGRICULTURE AND FORESTRY RESOURCES — In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Discussion

a) **No Impact.** The project site is not included within the Department of Conservation Farmland Mapping and Monitoring Program survey boundaries (California Department of Conservation 2016a). The project site is not located on land that is designated as agriculture by the South Los Angeles Community General Plan and is not located on land zoned for agricultural uses. The proposed project would be implemented on private property that is designated by the City of Los Angeles for Light Industrial land uses and zoned as M2 (Light Industrial Zone) (City of Los Angeles 2017; City of Los Angeles 2020). Therefore, implementation of the proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. No impact would occur.

b) **No Impact.** According to the California Department of Conservation, the project site is not located on land under a Williamson Act contract (California Department of Conservation 2016b). In addition, the project site is not located on land zoned for agricultural use (City of Los Angeles 2017; City of Los Angeles 2020). Therefore, implementation of the proposed project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impact would occur.

c, d) **No Impact.** The South Los Angeles Community Plan land use map and the City of Los Angeles zoning map do not include zoning categories related to forest land, timberland, or timberland zoned as Timberland Production (City of Los Angeles 2017; City of Los Angeles 2020). The project is not located on U.S. Department of Agriculture Forest Service land. The nearest forest land is Angeles National Forest approximately 29 miles northeast of the project site (NRCS 2020). The project would be constructed on a currently developed parcel and would not conflict with existing zoning for its current or proposed use. The proposed project would not result in the conversion of forest land and no impact would occur.

e) **No Impact.** As discussed above, the project site is not located on land designated as Prime Farmland, Unique Farmland, Farmland of Statewide Importance, timberland, or forest land. Therefore, implementation of the proposed project would not convert farmland or forestland, and no impact would occur.

References

California Department of Conservation, 2016a. Los Angeles County Important Farmland Map. Available at: ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf. Accessed May 12, 2020.

California Department of Conservation, 2016b. Los Angeles County Williamson Act FY 2015-2016 Map. Available at: https://www.conservation.ca.gov/dlrp/wa. Accessed May 13, 2020.

City of Los Angeles, 2001. City of Los Angeles General Plan, Conservation Element, Adopted September 2001. Available at: https://planning.lacity.org/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf. Accessed May 12, 2020.

City of Los Angeles, 2017. South Los Angeles Community Plan. Available at: https://planning.lacity.org/odocument/b909e749-754e-4caa-af7f-14c82adaa2b7/South_Los_Angeles_Community_Plan.pdf. Accessed May 13, 2020.

City of Los Angeles, 2020. Zone Information and Map Access System (ZIMAS). Available at: https://planning.lacity.org/zoning/zoning-map. Accessed May 13, 2020.

USDA Natural Resources Conservation Service (NRCS), 2020. Farmland Protection Policy Act Web Site. Available at: https://www.nrcs.usda.gov/wps/portal/nrcs/main/national/landuse/fppa/. Accessed May 13, 2020.

2.3 Air Quality

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
AIR QUALITY — Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Discussion

a) **Less than Significant Impact.** The project site is located within the 6,745-square-mile South Coast Air Basin (SCAB). Air quality planning for the SCAB is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD has adopted a series of Air Quality Management Plans (AQMPs) to meet the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS) for criteria air pollutants. The SCAQMD is required, pursuant to the federal Clean Air Act (CAA), to reduce emissions of criteria pollutants for which the SCAB is in non-attainment of the NAAQS (i.e., ozone [O_3] and fine particulate matter [PM2.5]). The SCAQMD, California Air Resources Board (CARB), and United States Environmental Protection Agency (USEPA) have adopted the 2012 AQMP, which incorporates scientific and technological information and planning assumptions, regarding air quality and regional growth projections from the Southern California Association of Governments (SCAG), and emission inventory methodologies for various source categories (SCAQMD 2013). The key undertaking of the 2012 AQMP is to bring the SCAB into attainment with the NAAQS for the 24-hour PM2.5 standard. It also intensifies the scope and pace of continued air quality improvement efforts toward meeting the 8-hour O_3 standard with new measures designed to reduce reliance on the CAA Section 182(e)(5) long-term measures for nitrogen oxide (NO_X) and volatile organic compound (VOC) reductions. The SCAQMD expects exposure reductions to be achieved through implementation of new and advanced control technologies as well as improvement of existing technologies.

The 2012 AQMP was prepared to accommodate growth, reduce the high levels of pollutants within the areas under the jurisdiction of SCAQMD, return clean air to the region, and minimize the impact on the economy. Projects that are consistent with the assumptions used in the AQMP do not interfere with attainment because the growth is included in the projections used in the formulation of the AQMP. Thus, projects, uses,

and activities that are consistent with the applicable growth projections and control strategies used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP, even if they would individually exceed the SCAQMD's numeric indicators.

The SCAQMD released the Draft 2016 AQMP on June 30, 2016, for public review and comment. A revised Draft 2016 AQMP was released in October 2016, and the SCAQMD Governing Board adopted the 2016 AQMP on March 3, 2017. CARB approved the 2016 AQMP on March 23, 2017 (SCAQMD 2016). USEPA approval is pending, but is a necessary requirement before the 2016 AQMP can be incorporated into the State Implementation Plan. Key elements of the 2016 AQMP include implementing fair-share emissions reductions strategies at the federal, state, and local levels; establishing partnerships, funding, and incentives to accelerate deployment of zero and near-zero-emissions technologies; and taking credit from co-benefits from greenhouse gas (GHG), energy, transportation, and other planning efforts. The strategies included in the 2016 AQMP are intended to demonstrate attainment of the NAAQS for the federal O_3 and PM2.5 standards. Until such time as the 2016 AQMP is approved by USEPA, the 2012 AQMP remains the applicable AQMP.

Construction

Construction activities associated with the project have the potential to generate temporary criteria pollutant emissions through the use of heavy-duty construction equipment, such as loaders and air compressors, and through vehicle trips generated from worker trips, vendor trucks, and haul trucks traveling to and from the construction areas. In addition, fugitive dust emissions would result from construction activities. Mobile source emissions, primarily NO_X, would result from the use of construction equipment. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of construction activity, and prevailing weather conditions. The assessment of construction air quality impacts considers each of these potential sources.

Under this criterion, the SCAQMD recommends that lead agencies demonstrate that a project would not directly obstruct implementation of an applicable air quality plan and that a project be consistent with the assumptions (typically land use related, such as resultant employment or residential units) upon which the air quality plan is based. The project would result in an increase in short-term employment compared to existing conditions. Being relatively small in number and temporary in nature, construction jobs under the project would not conflict with the long-term employment projections upon which the AQMP is based. Control strategies in the AQMP with potential applicability to short-term emissions from construction activities include strategies denoted in the 2012 AQMP as ONRD-04 and OFFRD-01 and in the 2016 AQMP as MOB-08 and MOB-10 and are intended to reduce emissions from on-road and off-road heavy-duty vehicles and equipment by accelerating replacement of older, emissions-prone engines with newer engines meeting more stringent emission standards. Construction contractors would be required to comply with the CARB Air Toxic Control Measure that limits heavy-duty diesel motor vehicle idling to no more than 5 minutes at any given location. In addition,

contractors would be required to comply with required and applicable Best Available Control Technology (BACT) and the CARB In-Use Off-Road Diesel Vehicle Regulation to use lower-emitting equipment in accordance with the phased-in compliance schedule for equipment fleet operators. The project would not conflict with implementation of these strategies. The project would also comply with SCAQMD regulations for controlling fugitive dust pursuant to SCAQMD Rule 403.

Compliance with these requirements is consistent with and meets or exceeds the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. Because the project would not conflict with the control strategies intended to reduce emissions from construction equipment, the project would not conflict with or obstruct implementation of the AQMP, and impacts would be less than significant.

Operations

Both the 2012 AQMP and 2016 AQMP were prepared to accommodate growth, reduce the levels of pollutants within the areas under the jurisdiction of the SCAQMD, return clean air to the region, and minimize the impact on the economy. Projects that are considered consistent with the AQMP would not interfere with attainment because this growth is included in the projections used in the formulation of the AQMP. The project would result in an open storage area that would have no effect on long-term population and employment growth. The project does not include residential or commercial development, and its implementation is not forecast to induce any additional growth within the service area. Once demolition is complete and the site is cleared of debris, a new chain-link fence would be constructed along the perimeter of the property. The project would not generate net new operational emissions aside from minimal use of trucks and equipment, as it is estimated that approximately three truck trips per week would enter/exit the storage area and 3 hours of forklift usage per week would occur at the project site. Therefore, the project would not conflict with growth projections in the AQMP. As the project would not conflict with the growth projections in the AQMP, impacts would be less than significant.

b) **Less than Significant Impact.** As indicated above, the project site is located within the SCAB. State and federal air quality standards are exceeded in many parts of the SCAB for O_3 and PM2.5, including those monitoring stations nearest to the project site. The project would contribute to local and regional air pollutant emissions during construction (short-term or temporary). However, based on the following analysis, construction and operation of the project would result in less than significant impacts relative to the daily significance thresholds for criteria air pollutant emissions established by the SCAQMD for construction and operational phases.

Daily regional construction and operational source project criteria pollutant emissions (VOC, NO_X, carbon monoxide [CO], sulfur dioxide [SO_2], respirable particulate matter [PM10], and PM2.5) were estimated using the California Emissions Estimator Model (CalEEMod) Version 2016.3.2, which is designed to model construction emissions for

land use development projects based on building size, land use and type, and disturbed acreage, and allows for the input of project-specific information. Project-generated emissions of criteria air pollutants (i.e., CO, SO_2, PM10, and PM2.5) and ozone precursors (i.e., VOC and NO_X) were modeled based on project-specific information provided in the proposed project description by LADWP, and default SCAQMD-recommended settings and parameters attributable to the proposed land use types and site location. The model incorporates emission factors from the CARB OFFROAD model and the on-road vehicle EMFAC2014 model and is considered to be an accurate and comprehensive tool for quantifying air quality impacts from land use projects throughout California; the model is also recommended by the SCAQMD.[2] The emissions from worker vehicle trips, haul truck trips, and vendor truck trips were estimated outside of CalEEMod to account for the CARB 2017 on-road vehicle emissions factor (EMFAC2017) model, because EMFAC2017 has not yet been incorporated in the current version of CalEEMod, and to incorporate the adjustment factors for the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part I: One National Program (SAFE Rule Part I). In addition, the construction off-road construction equipment emissions accounts for implementation of applicable Environmental Standards of the South Los Angeles Community Plan Implementation Overlay (CPIO) District, including that on-site generators are required to meet 0.01 grams per brake horsepower-hour (g/bhp-hr) standard for particulate matter, or be equipped with BACT for particulate matter emissions reductions (see **Appendix A** for additional details).

Construction

Construction activities associated with the project would generate temporary and short-term emissions of VOC, NO_X, CO, SO_2, PM10, and PM2.5. Construction-related emissions are expected from construction activities and construction worker commutes. As described in Section 1.5, *Project Construction*, project construction would include mobilization and capping of utilities, hazardous materials remediation, installation of pedestrian protection and fencing, salvaging of construction materials, removal of wood framing, removal of walls, removal of foundation, backfilling and minor grading, and cleanup and installation of fencing. Project construction is expected to commence in August of 2021 and would take approximately 4.5 months to complete. Maximum daily activities would involve up to two crews working simultaneously, with specified crews based on the different tasks. The construction schedule used in the air quality impact analysis assumes one crew per task, with two crews overlapping during installation of pedestrian protection and fencing and salvaging of construction materials, and two crews partially overlapping during the removal of wood framing and removal of walls. If project construction commences later than the anticipated start date, air quality impacts would be less than those analyzed herein, because a more energy-efficient and cleaner-burning construction equipment fleet mix would be expected in the future, pursuant to state regulations that require construction equipment fleet operators to phase in less

[2] See: South Coast Air Quality Management District, Air Quality Modeling, http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-modeling.

polluting heavy-duty equipment. Therefore, air quality impacts would generally be less than those analyzed herein due to the likelihood of less emissions generated in a day.

The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per CEQA Guidelines. Site-specific construction fleets may vary due to specific project needs at the time of construction. A detailed summary of construction equipment assumptions by task is provided in the modeling files in the Air Quality, Greenhouse Gas, and Energy Technical Report included as Appendix A.

The estimated unmitigated maximum daily construction emissions are summarized in **Table 2-1**. As shown in Table 2-1, construction-related daily emissions would not exceed the SCAQMD numeric indicator of significance. As the project's maximum regional emissions from construction would not exceed the regional numeric indicator, the project's regional construction emissions impacts would be less than significant.

TABLE 2-1
UNMITIGATED MAXIMUM DAILY REGIONAL CONSTRUCTION EMISSIONS (POUNDS PER DAY) [a]

Source	VOC	NO_X	CO	SO_2	PM10 [b]	PM2.5 [b]
Mobilization and Capping of Utilities	<1	3	5	<1	<1	<1
Hazardous Materials Remediation	1	12	8	<1	1	<1
Installation of Pedestrian Protection and Fencing	<1	3	3	<1	<1	<1
Salvaging of Construction Materials	1	9	4	<1	1	<1
Removal of Wood Framing	1	12	6	<1	2	1
Removal of Walls	1	10	5	<1	1	<1
Removal of Foundation	2	19	15	<1	2	1
Backfilling and Minor Grading	<1	2	3	<1	<1	<1
Cleanup and Removal of Fencing	<1	3	3	<1	<1	<1
Demolition Finish	<1	<1	1	<1	<1	<1
Overlap of Installation of Pedestrian Protection and Fencing and Salvaging of Construction Materials	1	12	7	<1	1	1
Overlap of Removal of Wood Framing and Removal of Walls	2	22	11	<1	3	1
Maximum Daily Emissions	2	22	15	<1	3	1
SCAQMD Numeric Indicators	**75**	**100**	**550**	**150**	**150**	**55**
Exceeds Thresholds?	No	No	No	No	No	No

[a] Totals may not add up exactly due to rounding in the modeling calculations.

[b] Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

SOURCE: ESA, 2020

Operations

Once construction is complete and the site is cleared, the project site would be used by LADWP for open air storage. Operation of the project would not result in a net increase in operational emissions. The project would not generate net new operational emissions aside from infrequent truck trips and minimal usage of equipment, as it is estimated that approximately three truck trips per week would enter/exit the storage area and 3 hours of forklift usage per week would occur at the project site. Therefore, project operational-source emissions would not exceed applicable SCAQMD regional thresholds of significance. As such, operation of the project would result in a less than significant impact.

The SCAB is currently in extreme non-attainment for the O_3 and PM2.5 NAAQS and CAAQS and non-attainment for the PM10 CAAQS.[3] A significant impact may occur if a project were to add a cumulatively considerable contribution of a federal or state non-attainment pollutant. Because the SCAB is currently in non-attainment for O_3, PM10, and PM2.5, related projects could cause ambient concentrations to exceed an air quality standard or contribute to an existing or projected air quality exceedance. Cumulative impacts to air quality are evaluated under two sets of thresholds for CEQA and the SCAQMD. In particular, CEQA Guidelines Section 15064(h)(3) provides guidance in determining the significance of cumulative impacts. Specifically, Section 15064(h)(3) states in part that:

> *"A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program which provides specific requirements that will avoid or substantially lessen the cumulative problem (e.g., water quality control plan, air quality plan, integrated waste management plan) within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency…"*

For purposes of the cumulative air quality analysis with respect to CEQA Guidelines Section 15064(h)(3), the project's incremental contribution to cumulative air quality impacts is determined based on compliance with the SCAQMD-adopted AQMP. The AQMP includes demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment), developed by SCAG for their Regional Transportation Plan. As discussed under Section 2.3 (a), the project would be consistent with the AQMP.

[3] The Los Angeles County portion of the SCAB is also non-attainment for the lead NAAQS; however, this was due to lead emissions from a battery-recycling facility that is no longer in operation. The project would not result in lead emissions to the environment; therefore, lead impacts from the project would not occur.

The SCAQMD CEQA Air Quality Handbook states that "[f]rom an air quality perspective, the impact of a project is determined by examining the types and levels of emissions generated by the project and its impact on factors that affect air quality. As such, projects should be evaluated in terms of air pollution thresholds established by the District" (SCAQMD 1993). The SCAQMD has provided guidance on an acceptable approach to addressing the cumulative impacts issue for air quality. The SCAQMD "uses the same significance thresholds for project-specific and cumulative impacts…projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant" (SCAQMD 2003).

As the project is not part of an ongoing regulatory program, the SCAQMD also recommends that project-specific air quality impacts be used to determine the potential cumulative impacts to regional air quality. As discussed above, peak daily emissions of construction-related pollutants would not exceed SCAQMD regional significance thresholds and construction impacts would be less than significant. Operational emissions would not exceed the SCAQMD regional significance thresholds and operational impacts would be less than significant. By applying SCAQMD's cumulative air quality impact methodology, implementation of the project would not result in an addition of criteria pollutants such that cumulative impacts would occur in conjunction with related projects in the region.

c) **Less than Significant Impact.** The localized effects from the on-site portion of the emissions are evaluated at air-quality-sensitive receptor locations potentially impacted by the project according to the SCAQMD's Localized Significance Threshold Methodology, which relies on on-site mass emission rate screening tables and project-specific dispersion modeling typically for sites greater than 5 acres, as appropriate (SCAQMD 2008). The localized significance thresholds (LSTs) are applicable to emissions of NO_X, CO, PM10, and PM2.5. For NO_X and CO, the thresholds are based on the ambient air quality standards. For PM10 and PM2.5, the thresholds are based on requirements in SCAQMD Rule 403 (Fugitive Dust) for construction and Rule 1303 (New Source Review Requirements) for operations. The SCAQMD has established conservative screening criteria that can be used to determine the maximum allowable daily emissions that would satisfy the LSTs and therefore not cause or contribute to an exceedance of the applicable ambient air quality standards without project-specific dispersion modeling. The screening criteria depend on: (1) the source receptor area (SRA) in which the project is located; (2) the size of the project site; and (3) the distance between the project site and the nearest sensitive receptor (e.g., residences, schools, hospitals). These screening criteria were used in this assessment. For the project, the appropriate SRA for the LSTs is the Southwest Los Angeles County Coastal Monitoring Station (SRA 3). The nearest sensitive receptors would be single-family and multi-family residential uses located south of the project site across Gage Avenue. The SCAQMD's methodology clearly states that "off-site mobile emissions from the project should not be included in the emissions

compared to LSTs." Therefore, for purposes of the LST analysis, only emissions included in the CalEEMod "on-site" emissions outputs were considered.

Construction

Table 2-2 identifies the localized impacts at the nearest receptor, assumed to be located south of the project site.

TABLE 2-2
UNMITIGATED MAXIMUM DAILY LOCALIZED CONSTRUCTION EMISSIONS (POUNDS PER DAY) [a]

Source	NO_X	CO	PM10 [b]	PM2.5 [b]
Mobilization and Capping of Utilities	3	4	<1	<1
Hazardous Materials Remediation	3	4	<1	<1
Installation of Pedestrian Protection and Fencing	3	2	<1	<1
Salvaging of Construction Materials	7	2	1	<1
Removal of Wood Framing	7	2	1	<1
Removal of Walls	7	2	1	<1
Removal of Foundation	15	12	1	1
Backfilling and Minor Grading	2	2	<1	<1
Cleanup and Removal of Fencing	3	2	<1	<1
Demolition Finish	0	0	0	0
Overlap of Installation of Pedestrian Protection and Fencing and Salvaging of Construction Materials	10	5	1	<1
Overlap of Removal of Wood Framing and Removal of Walls	14	5	2	1
Maximum Daily Emissions	15	12	2	1
SCAQMD Numeric Indicators[c]	**91**	**664**	**5**	**3**
Exceeds Thresholds?	No	No	No	No

[a] Totals may not add up exactly due to rounding in the modeling calculations.
[b] Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.
[c] Based on SCAQMD lowest screening criteria for SRA 3 at 25 meters for a 1-acre site.
SOURCE: ESA, 2020

Localized emissions would not exceed the screening criteria at sensitive receptor locations. Therefore, localized impacts would be less than significant.

Operations

According to SCAQMD LST methodology, LSTs would apply to the operational phase of a project if the project includes stationary sources, or attracts mobile sources, that may spend long periods queuing and idling at the site (e.g., warehouse or transfer facilities). Once construction is complete and the site is cleared, the project site will be used by LADWP for open air storage, and no new stationary emission sources would be required. Overall, given the infrequent truck trips and minimal usage of equipment, as

it is estimated that approximately three truck trips per week would enter/exit the storage area and 3 hours of forklift usage per week would occur at the project site, localized project operational-source emissions would not exceed applicable SCAQMD localized thresholds of significance and operational impacts would be less than significant.

CO "Hot Spot" Analysis

A CO hot spot is an area of localized CO pollution that is caused by severe vehicle congestion on major roadways, typically near intersections. Projects may worsen air quality if they increase the percentage of vehicles in cold start modes by 2 percent or more, significantly increase traffic volumes (e.g., by 5 percent or more) over existing volumes, or worsen traffic flow, defined for signalized intersections as increasing average delay at intersections operating at Level of Service (LOS) E or F or causing an intersection that would operate at LOS D or better without the project, to operate at LOS E or F. While construction-related traffic on the local roadways would occur during construction, the net increase of construction worker vehicle trips to the existing daily traffic volumes on the local roadways would be relatively small and would not result in CO hot spots. Additionally, the construction-related vehicle trips would only occur in the short-term, and would cease once construction activities end. During operation, the project site would be used as an open air storage area and only minimal emissions would be generated from infrequent truck trips and minimal usage of equipment. It is estimated that approximately three truck trips per week would enter/exit the storage area and 3 hours of forklift usage per week would occur at the project site during operation and maintenance activities. Therefore, impacts would be less than significant.

Toxic Air Contaminants

Concentrations of toxic air contaminants (TACs) are also used as indicators of ambient air quality conditions. A TAC is defined as an air pollutant that may cause or contribute to an increase in mortality or in serious illness, or that may pose a hazard to human health. TACs are usually present in minute quantities in the ambient air; however, their high toxicity or health risk may pose a threat to public health even at low concentrations.

Construction

Construction activities associated with the project would result in temporary and short-term emissions of diesel particulate matter, which the State has identified as a TAC. During construction, the exhaust of off-road heavy-duty diesel equipment and heavy-duty trucks would emit diesel particulate matter during general construction activities.

Diesel particulate matter poses a carcinogenic health risk that is generally measured using an exposure period of 30 years for sensitive residential receptors, according to the California Environmental Protection Agency, Office of Environmental Health Hazard Assessment (OEHHA) *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments* (OEHHA Guidance), which was updated in 2015 with new exposure parameters, including age sensitivity factors (OEHHA 2015). Sensitive receptors would be located south of the project site; however, localized diesel particulate

matter emissions (strongly correlated with PM2.5 emissions) would be minimal and would be below localized thresholds as presented in Table 2-2. Although the localized analysis does not directly measure health risk impacts, it does provide data that can be used to evaluate the potential to cause health risk impacts. Furthermore, construction activity would occur for a temporary and short-term duration. The low level of PM2.5 emissions coupled with the very short-term duration of construction activity at any one location, and the relatively small-scale of the project, would result in an overall low level of diesel particulate matter concentrations at sensitive receptor locations. Furthermore, compliance with the CARB anti-idling Air Toxics Control Measure, which limits idling to no more than 5 minutes at any location for diesel-fueled commercial vehicles, would further minimize diesel particulate matter emissions in the construction area. The project would also use a construction contractor(s) that complies with required and applicable BACT and the In-Use Off-Road Diesel Vehicle Regulation. Thus, it is expected that sensitive receptors would be exposed to emissions below thresholds and construction TAC impacts would be less than significant.

Operations

The project would not require new stationary equipment. The project would not result in any other substantial sources of operational TAC emissions. Therefore, the project would not expose surrounding sensitive receptors to net new long-term TAC emissions and impacts would be less than significant.

d) **Less than Significant Impact.** Potential sources that may emit odors during construction activities include construction equipment exhaust. According to the SCAQMD CEQA Air Quality Handbook, construction equipment is not a typical source of odors. Further, any potential odor from construction emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of construction. No construction activities or materials are proposed that would create objectionable odors. In addition, through adherence with mandatory compliance with SCAQMD rules, impacts would be considered less than significant during construction.

According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities. The project does not have any uses matching any of the listed categories. Therefore, operation of the proposed project would not generate odors affecting a substantial number of people and impacts would be less than significant.

References

Office of Environmental Health Hazard Assessment (OEHHA), 2015. Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. Available at: http://oehha.ca.gov/air/crnr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0. Accessed June 2020.

South Coast Air Quality Management District (SCAQMD). 1993. CEQA Air Quality Handbook. 1993, p. 6-1.

SCAQMD, 2003. Cumulative Impacts White Paper, Appendix D. Available at: http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf?sfvrsn=4. Accessed June 2020.

SCAQMD, 2008. Final Localized Significance Threshold Methodology. Available at: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds. Accessed June 2020.

SCAQMD, 2013. Final Air Quality Management Plan. Available at: http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2012-air-quality-management-plan. Accessed June 2020.

SCAQMD, 2016. Air Quality Management Plan (AQMP), Final 2016 AQMP. Available: http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan. Accessed June 2020.

2.4 Biological Resources

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
BIOLOGICAL RESOURCES — Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Discussion

a) **No Impact.** The project site does not contain any vegetation and therefore does not contain any native plant habitat or support any special-status plant or wildlife species. The project site has been operating as an urban land use for decades. The site is paved and contains an existing two-story structure that covers the majority of the approximately 1.1-acre parcel. These characteristics are not conducive to wildlife habitat. Any wildlife potentially occurring on-site would likely be transitory and would be a species associated with urban areas (e.g., rats, mice). The project site does not contain any trees or vegetation. The proposed project would not remove any existing trees. In addition, the project vicinity is highly urbanized and does not support habitat for candidate, sensitive, or special-status plant species. Therefore, no impacts to candidate, sensitive, or special-status plant species would occur.

b) **No Impact.** The project site does not contain any riparian habitat or other sensitive natural communities identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service. Furthermore, the project site is not located in or adjacent to a Significant Ecological Area

as defined by the County of Los Angeles (County of Los Angeles 2019). As such, the project would have no impact on any riparian habitat or other sensitive natural community because those habitats do not occur on or near the project site.

c) **No Impact.** The U.S. Army Corps of Engineers defines wetlands as an area that has the following three attributes: (1) at least periodically, the land supports predominantly hydrophytes (e.g., "water-loving plants); (2) the substrate is predominantly undrained hydric (i.e., waterlogged soils); and (3) the substrate is saturated with or covered by shallow water at some time during the growing season. There are no geomorphic features that would qualify as a bed and bank defining a stream, impacts to which are regulatory by the California Department of Fish and Wildlife under California Fish and Game Code Section 1600 et seq. The proposed project is located within a highly urbanized area and the site is currently developed. No wetlands are present at the project site and the site does not include hydrophytes (such as cattails, bulrushes, and mulefat) or other features that define a wetland. Therefore, the project would not have a substantial adverse effect on federally protected wetlands. No impact would occur.

d) **No Impact.** The proposed project is located within a highly urbanized area and the site is currently developed with a two-story structure. There are no potential or established resident or migratory wildlife corridors on the project site or in the vicinity. This is due to the highly urbanized setting and lack of open space areas, particularly those areas that could facilitate the movement of wildlife species between larger stands of undeveloped habitat. Accordingly, the development of the project would not substantially interfere or impede any regional wildlife corridors or native wildlife nursery sites. Further, no water bodies that could serve as a habitat for fish exist on the project site or in the vicinity.

The federal Migratory Bird Treaty Act (16 USC, Sec. 703, Supp. 1, 1989) prohibits killing, possessing, or trading in migratory birds, except in accordance with regulations prescribed by the Secretary of the Interior. Native birds, their eggs, and nests are also protected by California Fish and Game Code Sections 3500 and 3800, and thus impacts to native birds or their nests during the breeding season are potentially significant. There are no trees or vegetation within the project site, and the proposed project would not remove existing trees or plant new trees. The project site is developed with a two-story structure and parking area, and once construction is complete and the site is cleared, the proposed project site would be used as an open air storage site for LADWP. The proposed project implementation would not interfere with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. No impacts would occur.

e) **No Impact.** The City of Los Angeles Protected Tree Ordinance (Los Angeles Municipal Code [LAMC] Chapter IV, Article 6) regulates the relocation or removal of all Southern California native oak trees (the genus *Quercus*, excluding scrub oak), Southern California black walnut trees (*Juglans californica*), western sycamore trees (*Platanus racemosa*) and California bay trees (*Umbellularia californica*) of at least 4 inches in diameter at

breast height. These tree species are considered "protected" by the City of Los Angeles. The Ordinance prohibits, without permit, the removal of any regulated protected tree, including "acts which inflict damage upon root systems or other parts of the tree …" and requires that all regulated protected trees that are removed be replaced on at least a two-to-one basis with trees that are of a protected variety. The project site does not contain locally-protected biological resources, including trees such as oak trees, Southern California black walnut, western sycamore, and California bay trees. Project implementation would not involve the removal of any protected or California native trees, nor would it conflict with any local policies or ordinances protecting biological resources. Thus, the project would not disturb any native or protected trees as defined by LAMC Section 17.02, and there would be no impact. The proposed project would not conflict with any local policies or ordinances protecting biological resources and impacts would not occur.

f) **No Impact.** The proposed project is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plans. The project site is also not located within a Significant Ecological Area, as defined by the County of Los Angeles to hold important biological resources representing the wide-ranging biodiversity of the County (County of Los Angeles 2019). No impact would occur.

References

County of Los Angeles, 2019. Figure 9.3: Significant Ecological Areas and Coastal Resource Areas Policy Map, October 2019. Available at: http://planning.lacounty.gov/site/sea/maps/. Accessed May 26, 2020.

2.5 Cultural Resources

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
CULTURAL RESOURCES — Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

Discussion

The analysis of impacts to archaeological and historic resources is based, in part, on the following two reports: *St. Andrews Place Demolition Project - Archaeological Resources Assessment* and *6236 S. St. Andrews Place Historic Resources Assessment* prepared by ESA in June 2020. These reports are included as **Appendix B**.

a) **Less than Significant Impact with Mitigation.** One historic-period built resource, the Bauman Brothers Furniture Manufacturing Co. (Bauman Brothers) industrial complex, was identified within the project site.

The industrial complex was identified as a potentially eligible resource in the City of Los Angeles citywide historical resources survey (SurveyLA) of Industrial Zone Properties in South Los Angeles, in 2016. SurveyLA identified the resource as potentially eligible for listing in the National Register of Historic Places (National Register), the California Register of Historical Resources (California Register), and for local listing because it represents an excellent and rare example of 1920s industrial development in the area.

The first building in the industrial complex to be constructed was completed in 1928 as a Mediterranean Revival-style furniture factory with Italianate decorative elements designed by architect John M. Cooper Company for Bauman Brothers industrial complex, fronting S. St. Andrews Place. An additional brick vernacular industrial building designed by John M. Cooper Company was also constructed fronting Gage Avenue in 1928. Over the years, several additions and alterations were made to the factory to support the expansion of the Bauman Brothers industrial enterprise, most notably, construction of one additional building in 1941 in a utilitarian Late Moderne-style south of the original building designed by Engineer H. Sage Webster, and another similar building further south in 1946 also in a utilitarian Late Moderne-style designed by Engineer A. Karl Leatherwood, constructed fronting S. St. Andrews Place. Bauman Brothers continued to own the property and manufacture furniture at this location until 1968.

As part of the current project, the industrial complex was subject to evaluation for inclusion in the National Register, California Register, and local listing as a Los Angeles Historic Cultural Monument. The evaluation included intensive-level pedestrian site survey of the exterior and interior of the complex, as well as extensive occupation and construction history research to document the complex's chronology and alterations. As a result of the evaluation, the industrial complex was recommended not eligible for listing in the National Register, the California Register, or for local listing. The complex is ineligible under Criterion A/1/1 because it has undergone many modifications and large additions that detract from its integrity and association with 1920s industrial development of South Los Angeles, and Bauman Brothers was a small unimportant enterprise and does not appear to have made any significant contribution to the development of the furniture manufacturing industry. The complex is ineligible under Criterion B/2/2 because there are no important persons associated with the complex. The complex is ineligible under Criterion C/3/3 because it does not appear to be architecturally significant. The complex is ineligible under Criterion D/4 because it does not reveal important information about prehistory or history. Therefore, the Bauman Brothers industrial complex does not qualify as a historical resource and its demolition would not constitute a significant impact.

The archaeological resources assessment prepared for the project included a records search conducted by the California Historical Resources Information System – South Central Coastal Information Center, a Sacred Lands File search conducted by the California Native American Heritage Commission (NAHC), a review of historic aerial photographs and topographic maps, and a subsurface archaeological resources assessment. No known archaeological resources were identified within the project site as a result of the archaeological resources assessment. The subsurface archaeological sensitivity assessment indicates the project site is underlain by late Pleistocene to Holocene-age alluvial sediments, which encompass the entirety of the region's human occupation, and therefore would have the potential to contain subsurface archaeological deposits. Given that project-related ground-disturbing activities will extend to depths of 5 feet, there is the potential for pockets of undisturbed soil containing archaeological resources that qualify as historical resources to be encountered during project implementation. As such, project implementation has the potential to cause a substantial adverse change in the significance of a historical resource. With the incorporation of **Mitigation Measures CUL-1 through CUL-4**, potential impacts to unknown archaeological deposits that could qualify as historical resources would be reduced to less than significant.

Mitigation Measures

CUL-1: Prior to the start of ground-disturbing activities, LADWP shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (U.S. Department of the Interior 2012) to support the implementation of cultural resources mitigation measures and monitoring.

CUL-2: Prior to the start of ground-disturbing activities, a cultural resources sensitivity training shall be conducted for all construction personnel. Construction personnel shall be informed of the types of archaeological resources that may be encountered, and of the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains. LADWP shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.

CUL-3: An archaeological monitor (working under the direction of the qualified archaeologist) shall observe all subsurface ground-disturbing activities. A Native American monitor from the Native American groups identified by the NAHC as having affiliation with the project area shall also be invited to observe subsurface ground-disturbing activities. The qualified archaeologist, in coordination with LADWP, may reduce or discontinue monitoring if it is determined that the possibility of encountering buried archaeological deposits is low based on observations of soil stratigraphy or other factors. Archaeological monitoring shall be conducted by an archaeologist familiar with the types of archaeological resources that could be encountered within the project site. The archaeological monitor and Native American monitor, in coordination with the construction manager or resident engineer, shall be empowered to request the halting or redirecting of ground-disturbing activities away from the vicinity of a discovery until the qualified archaeologist has evaluated the discovery and determined appropriate treatment. The archaeological monitor shall keep daily logs detailing the types of activities and soils observed, and any discoveries. After monitoring has been completed, the qualified archaeologist shall prepare a monitoring report that details the results of monitoring. The report shall be submitted to LADWP and any Native American groups who request a copy. A copy of the final report shall be filed at the South Central Coastal Information Center.

CUL-4: In the event of the unanticipated discovery of archaeological materials, LADWP shall immediately cease all work activities in the area (within approximately 50 feet) of the discovery until it can be evaluated by the qualified archaeologist. Construction shall not resume until the qualified archaeologist has conferred with LADWP on the significance of the resource.

If it is determined that the discovered archaeological resource constitutes a historical resource and/or a unique archaeological resource pursuant to CEQA, avoidance and preservation in place shall be the preferred manner of mitigation. Preservation in place maintains the important relationship between artifacts and their archaeological context. Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement. In the event that preservation in place is determined to be infeasible and data recovery through excavation is the only feasible mitigation available, an Archaeological Resources Treatment Plan shall be prepared and implemented by the qualified archaeologist in consultation with LADWP that provides for the adequate recovery of the scientifically consequential information contained in the archaeological resource. LADWP shall consult with appropriate Native American representatives in determining treatment for prehistoric or Native American resources to ensure cultural values ascribed to the resource, beyond that which is scientifically important, are considered.

b) **Less than Significant Impact with Mitigation.** As noted above under Section 2.5 (a), no known archaeological resources were identified within the project site as a result of the archaeological resources assessment prepared for the project. However, the project site is underlain by sediments of appropriate age to contain subsurface archaeological deposits. Given that project-related ground-disturbing activities will extend to depths of 5 feet, there exists the possibility that pockets of undisturbed soil containing archaeological resources that do not qualify as a historical resource, however do qualify as a unique archaeological resources could be encountered. As such, project implementation has the potential to cause a substantial adverse change in the significance of a unique archaeological resource. With the incorporation of **Mitigation Measures CUL-1 through CUL-4**, potential impacts to unknown archaeological deposits that could qualify as unique archaeological resources would be reduced to less than significant.

c) **Less than Significant Impact with Mitigation.** No known formal or informal cemeteries or other burial places are known to exist within the project site. However, because the project would involve earthmoving activities to depths of 5 feet, there is the possibility that such actions could unearth, expose, or disturb previously unknown human remains. With the incorporation of **Mitigation Measure CUL-5**, which requires compliance with State Health and Safety Code Section 7050.5 and Public Resources Code (PRC) Section 5097.98, potential impacts to human remains would be less than significant.

Mitigation Measure

CUL-5: If human remains are encountered, LADWP shall halt work in the vicinity (within 100 feet) of the find and contact the Los Angeles County Coroner in accordance with PRC Section 5097.98 and Health and Safety Code Section 7050.5. If the County Coroner determines that the remains are Native American, the NAHC shall be notified, in accordance with Health and Safety Code Section 7050.5, subdivision (c), and PRC Section 5097.98 (as amended by AB 2641). The NAHC shall designate a most likely descendant (MLD) for the remains per PRC Section 5097.98. LADWP shall ensure that the immediate vicinity where the Native American human remains are located is not damaged or disturbed by further development activity, according to generally accepted cultural or archaeological standards or practices, until the landowner has discussed and conferred with the MLD regarding their recommendations, as prescribed in PRC Section 5097.98, taking into account the possibility of multiple human remains.

References

Environmental Science Associates (ESA). 2020a. *St. Andrews Place Demolition Project Archaeological Resources Assessment.* Prepared for the Los Angeles Department of Water and Power by ESA.

_____. 2020b. *6236 S. St. Andrews Place Historic Resources Assessment.* Prepared for the Los Angeles Department of Water and Power by Environmental Science Associates.

U.S. Department of the Interior, National Park Service. 2012*, Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation (As Amended and Annotated),* www.nps.gov/history/local- law/arch_stnds_0.htm, accessed November 4, 2014, 2008.

2.6 Energy

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
ENERGY — Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Discussion

a) **Less than Significant Impact.** The analysis below includes the project's energy requirements and energy use efficiencies by fuel type for each stage of the project (construction and operations).

Construction

The project would consume energy during construction activities, which would last approximately 4.5 months, primarily as a result of on- and off-road vehicle fuel consumption in the form of diesel and gasoline, necessary to construct the project.

Construction electricity consumption would include electricity consumed to power the construction trailers (lights, electronic equipment, and heating and cooling) and exterior uses such as lights, conveyance of water for dust control, and any electrically driven construction equipment. Electricity consumption for the project is anticipated to be approximately 9 MWh for the duration of the construction activities. This represents less than 0.001 percent of the anticipated sales for LADWP and electricity use would be considered less than significant. Construction activities typically do not involve the consumption of natural gas.

The estimated fuel usage for off-road equipment is based on the number and type of equipment that would be used during construction activities, hour usage estimates, the total duration of construction activities, and hourly equipment fuel consumption factors from the CARB OFFROAD model, which was used in the project's air quality analysis. On-road vehicles would include trucks to haul material to and from the project site, vendor trucks to deliver supplies necessary for project construction, and fuel used for employee commute trips. **Table 2-3** summarizes the project's total and yearly fuel consumption from construction activities.

TABLE 2-3
ESTIMATED PROJECT CONSTRUCTION FUEL CONSUMPTION

	Total Project Fuel Consumption (gallons)	
	Diesel	**Gasoline**
Total Project	11,400	1,615
Annual Average	11,400	1,615
County Usage[a]	530,000,000	3,640,000,000
% County Usage	0.002%	<0.001%

[a] CEC. 2018.
SOURCE: ESA, 2020

The petroleum-based fuel use summary provided in Table 2-3 represents the amount of transportation energy that could potentially be consumed during project construction based on a conservative set of assumptions, provided in **Appendix A**. As shown, on- and off-road vehicles would consume an estimated 1,615 gallons of gasoline and approximately 11,400 gallons of diesel fuel throughout the project's construction. For comparison purposes, the fuel usage during project construction would represent less than 0.001 percent of the 2018 annual on-road gasoline-related energy consumption and 0.002 percent of the 2018 annual diesel fuel-related energy consumption in Los Angeles County, as shown in Appendix A.

The project construction contractors would comply with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. CARB adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling time in order to reduce public exposure to diesel particulate matter and other TACs. CARB approved the Truck and Bus regulation to reduce NO_X, PM10, and PM2.5 emissions from existing diesel vehicles operating in California. In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models.

While intended to reduce construction criteria pollutant emissions, compliance with the above anti-idling and emissions regulations would also result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Thus, construction of the proposed project would use energy necessary to construct the new open space storage area, but would not result in the wasteful, inefficient, and unnecessary use of energy and impacts would be considered less than significant.

Operations

As stated above, operational energy consumption would be minimal as the project includes the demolition of an existing two-story structure and auxiliary structures, and future use of the project site for open air storage. The project would not result in net new electricity or natural gas energy consumption, but would require infrequent truck trips and minimal usage of equipment, as it is estimated that approximately three truck trips per week would enter/exit the storage area and 3 hours of forklift usage would be required per week. Fuel consumption from the minimal weekly truck trips and few pieces of equipment during project operations to move material to and from the project site would result in minimal energy use. Operation of the project would use energy necessary for the project's operational purposes but would not result in the wasteful, inefficient, and unnecessary use of energy and impacts would be considered less than significant.

b) **Less than Significant Impact.** Construction and operation of the project would not result in an appreciable increase in demand for electricity or natural gas. Once constructed the project would be an open air storage facility, and would contribute to minimal operational related energy consumption. Therefore, the project's burden on energy demand would be minimal and would not result in a need for increased supply or distribution infrastructure capabilities. Thus, impacts would be less than significant.

References

California Air Resources Board, Proposed Regulation Order: Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling, Appendix A, 2004. Available athttps://ww3.arb.ca.gov/regact/idling/isorappf.pdf Accessed June 2020.

California Energy Commission, 2018. California Retail Fuel Outlet Annual Reporting (CEC-A15) Results. https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/california-retail-fuel-outlet-annual-reporting. Accessed June 2020.

2.7 Geology and Soils

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
GEOLOGY AND SOILS — Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Discussion

a.i) **No Impact.** Seismically induced surface or ground rupture occurs when movement on a fault deep within the earth breaks through to the surface as a result of seismic activity. Fault rupture almost always follows preexisting faults, which are zones of weakness. Sudden displacements are more damaging to structures because they are accompanied by shaking. Under the Alquist-Priolo Earthquake Fault Zoning Act, which was passed in 1972, the California Geologic Survey (CGS) identifies areas in the state that are at risk from surface fault rupture. The Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. This requires CGS to establish regulatory zones, known as Alquist-Priolo Earthquake Fault Zones, around the surface traces of active faults and to issue appropriate maps that identify these zones.

The project site is located in the Los Angeles Basin, which is a northwest-trending alluvial plain on the coast of Southern California. The plain is bounded by mountains and hills on the north, northeast, east and southeast (Yerkes et al. 1965). The project site is not known to contain an active fault (movement within the last 11,000 years) and is not located within an Alquist-Priolo Earthquake Fault Zone (CGS 1986). Furthermore, the project site is not located in a City of Los Angeles designated Fault Rupture Study Zone (City of Los Angeles 1996). The nearest active fault is the Newport-Inglewood Fault, which is located approximately 3.5 miles southwest of the project site (SCEDC 2020). The proposed project would include the demolition of an existing two-story structure and auxiliary structures, and future use of the project site for open air storage, and would not require full time employees at the site. No impact would occur.

a.ii) **Less than Significant Impact.** As stated above, the proposed project is not located within an established Alquist-Priolo Earthquake Fault Zone. However, the project site is located in a seismically active region with numerous active faults. The Newport-Inglewood Fault is the nearest active fault, located approximately 3.5 miles southwest of the project site. Given the distance of known faults, there is a potential for high-intensity groundshaking associated with earthquakes in this region. The intensity of such an event would depend on the causative fault and the distance to the epicenter, the strength and duration of shaking, and the nature of the geologic materials within the project site. Seismic shaking during proposed demolition activity could place people and structures at risk. However, construction activity would be temporary and peak demolition activity would occur over a period of 2 weeks. No new structures would be constructed as part of the proposed project and operation and maintenance of the storage area would be minimal. Therefore, the proposed project's impact related to strong ground shaking would be considered less than significant.

a.iii) **Less than Significant Impact.** Liquefaction is a form of earthquake induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils. Liquefaction can occur when these types of soils lose their inherent shear strength due to excess water pressure that builds up during repeated movement from seismic activity. A shallow groundwater table, the presence of loose to medium dense sand and silty sand, and a long duration and high acceleration of seismic shaking are factors that contribute to the potential for liquefaction.

The project site is located within an area considered to have a high potential for liquefaction as designated by the Los Angeles General Plan Safety Element (City of Los Angeles 1996) and CGS mapping (CGS 1986). However, construction activity would be temporary and peak demolition activity would occur over a period of 2 weeks. No new structures would be constructed as part of the proposed project and operation and maintenance of the open storage area would be minimal. Therefore, the proposed project would not expose people or structures to potential substantial adverse effects related to liquefaction and impacts would be less than significant.

a.iv) **No Impact.** Landslides are movements of a mass of rock, debris, or earth down a slope (USGS 2020). The project site is located on a flat property and is not located within an area susceptible to landslides as designated in the Los Angeles General Plan Safety Element (City of Los Angeles 1996) and as designated on CGS mapping (CGS 1986). Therefore, the proposed project would not expose people or structures to potential substantial adverse effects related to landslides and no impact would occur.

b) **Less than Significant Impact.** During construction, the proposed project would include minor excavation up to 60 inches to remove perimeter footings from the two-story structure. These types of construction activities have the potential to disturb and expose native soils to soil erosion. Thus, construction of the proposed project has the potential to result in the erosion of soils during construction activities. Because the overall footprint of construction activities would exceed 1 acre, the proposed project would be required to comply with the *NPDES General Permit for Discharges of Storm Water Runoff Associated with Construction and Land Disturbance Activities* (Order 2009-0009-DWQ, NPDES No. CAS000002; as amended by Orders 2010-0014-DWQ and 2012-006-DWQ) (Construction General Permit). The Construction General Permit requires preparation and implementation of a stormwater pollution prevention plan (SWPPP), which requires applications of best management practices (BMPs) to control runoff from construction work sites. The BMPs would include, but would not be limited to, physical barriers to prevent erosion and sedimentation, construction of sedimentation basins, limitations on work periods during storm events, protection of stockpiled materials, and a variety of other measures that would substantially reduce or prevent erosion from occurring during construction. Following construction activity, backfilling and minor grading would occur.

During operation, the proposed project site where the two-story structure was previously located would be exposed soil. This soil would be compacted and maintained. In addition, LADWP would implement operational BMPs to avoid the loss of any topsoil or erosion within the project site. With implementation of the site specific SWPPP and BMPs, impacts related to substantial soil erosion or loss of topsoil would be considered less than significant.

c) **Less than Significant Impact.** As discussed above, impacts relating to liquefaction and landslides would be less than significant. Land subsidence can occur as a result of groundwater or oil extraction. Construction and operation of the proposed project would not include water or oil extraction and would not involve the pumping of groundwater. As such, implementation of the proposed project would not promote subsidence. No impact would occur.

d) **No Impact.** Expansive soils are defined as soils possessing clay particles that react to moisture changes by shrinking when dry or swelling when wet. Changes in soil moisture content can result from precipitation, landscape irrigation, utility leakage, roof drainage, perched groundwater, drought, or other factors and may result in unacceptable settlement or heave of structures or concrete slabs to support on grade. The National Resource Conservation Service has not mapped this location for the potential presence of expansive

soils. In addition, the proposed project would not involve construction of any new structures on the project site that would have the potential to be impacted by expansive soils. No impact would occur.

e) **No Impact.** The proposed project would not include the installation or use of septic tanks or alternative wastewater disposal systems. Therefore, no construction or operational impacts associated with septic tanks or alternative wastewater disposal systems would occur.

f) **Less than Significant Impact with Mitigation**. Geologic mapping indicates the project site is located near the interface of Pleistocene-age (2,580,000 to 11,700 years ago) Quaternary older alluvium and Holocene-age (11,700 years ago to present) Quaternary alluvium (Dibblee and Minch 2007). Holocene-age sediments are typically too young to contain fossils; however, Pleistocene-age sediments are of appropriate age to contain paleontological resources. The depths at which Pleistocene sediments may occur is unknown. Project-related disturbance is anticipated to extend to depths of 5 feet for the removal of existing footings. Given the extent of previous disturbances associated with the historic construction of the complex and the relatively shallow depths of disturbance, project-related excavations are unlikely to encounter intact paleontological sediments during project implementation. Nonetheless, there is the potential for pockets of undisturbed soil containing paleontological resources to be encountered during project implementation. As such, there exists the potential for the project to directly or indirectly destroy a paleontological resource or unique geologic feature. With the incorporation of **Mitigation Measures GEO-1 through GEO-3**, potential impacts to paleontological resources and/or unique geologic features would be reduced to less than significant.

Mitigation Measures

GEO-1: Prior to the start of construction activities, LADWP shall retain a qualified paleontologist that meets the standards of the Society of Vertebrate Paleontology (2010) to support the implementation of mitigation measures related to paleontological resources.

GEO-2: Prior to the start of any ground-disturbing activities, a paleontological resources sensitivity training shall be conducted for all construction personnel. This training shall include information on what types of paleontological resources could be encountered during excavations, what to do in case an unanticipated discovery is made by a worker, and laws protecting paleontological resources. All construction personnel shall be informed of the possibility of encountering fossils and instructed to immediately inform the construction foreman or supervisor if any fossils are unexpectedly unearthed. LADWP shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.

GEO-3: If a unique geologic feature or paleontological resource is discovered during construction, LADWP shall immediately cease all work activities in the area (within approximately 50 feet) of the discovery until it can be evaluated by the qualified paleontologist. Construction shall not resume until the qualified

paleontologist has conferred with LADWP on the significance of the resource. At the qualified paleontologist's discretion and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing and evaluation of the find. All significant fossils shall be collected by the qualified paleontologist. Collected fossils shall be prepared to the point of identification and catalogued before they are submitted to their final repository. Any fossils collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Los Angeles County Natural History Museum, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they may be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school that accepts the fossils.

References

California Geological Survey (CGS), 1986. Earthquake Zones of Required Investigation of the Inglewood Quadrangle, July 1, 1986. Available at: https://gmw.conservation.ca.gov/SHP/EZRIM/Maps/INGLEWOOD_EZRIM.pdf. Accessed June 5, 2020.

City of Los Angeles, 1996. City of Los Angeles General Plan, Safety Element. Available at: https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf. Accessed May 19, 2020.

Dibblee, T.W., and J.A. Minch, 2007, Geologic Map of the Venice and Inglewood Quadrangles, Los Angeles County, California, Scale: 1:24,000, Dibblee Geological Foundation Map DF-322.

Society of Vertebrate Paleontology (SVP). 2010. Standard Procedures for the assessment and mitigation of adverse impacts to paleontological resources. Available at: http://www.vertpaleo.org/Impact_Mitigation_Guidelines.htm. Accessed November 1, 2018.

Southern California Earthquake Data Center (SCEDC), Significant Earthquakes and Faults, Fault Name Index: Newport-Inglewood Fault Zone, 2020. Available at: https://scedc.caltech.edu/significant/newport.html. Accessed June 5, 2020.

U.S. Geological Survey (USGS), 2020. *What is a landslide and what causes one?* Available at: https://www.usgs.gov/faqs/what-a-landslide-and-what-causes-one?qt-news_science_products=0#qt-news_science_products. Accessed June 5, 2020.

Yerkes, R.F.; T.H. McCulloh; J.E. Schoellhamer; and J.G. Vedder; Geology of the Los Angeles Basin California—an Introduction, *Geology of the Eastern Los Angeles Basin Southern California*, U.S. Geological Survey Professional Paper 420-A, 1965.

2.8 Greenhouse Gas Emissions

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
GREENHOUSE GAS EMISSIONS — Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Discussion

a) **Less than Significant Impact.** Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation, and storms. Historical records indicate that global climate changes have occurred in the past due to natural phenomena; however, current data increasingly indicate that the current global conditions differ from past climate changes in rate and magnitude. Global climate change attributable to anthropogenic (human) GHG emissions is currently one of the most important and widely debated scientific, economic, and political issues in the United States and the world. The Intergovernmental Panel on Climate Change (IPCC), in its *Fifth Assessment Report, Summary for Policy Makers*, stated that "it is *extremely likely* that more than half of the observed increase in global average surface temperature from 1951 to 2010 was caused by the anthropogenic increase in greenhouse gas concentrations and other anthropogenic forcings together."

GHGs are those compounds in the Earth's atmosphere which play a critical role in determining temperature near the Earth's surface. More specifically, these gases allow high-frequency shortwave solar radiation to enter the Earth's atmosphere, but retain some of the low-frequency infrared energy which is radiated back from the Earth towards space, resulting in a warming of the atmosphere. Not all GHGs possess the same ability to induce climate change; as a result the warming contribution of a GHG is commonly quantified in the common unit of carbon dioxide equivalent (CO_2e) over a 100-year period, by applying the appropriate global warming potential (GWP) value.[4]

The State defines GHGs as carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride (SF_6), perfluorocarbons (PFCs), and hydrofluorocarbons (HFCs). Because different GHGs have different global warming potentials (GWPs) and CO_2 is the most common reference gas for climate change, GHG emissions are often quantified and reported as CO_2 equivalents (CO_2e). For example, CH_4 has a GWP of 25 (over a 100-year period); therefore, 1 metric ton (MT) of CH_4 is equivalent to 25 MT of CO_2 equivalents ($MTCO_2e$). The IPCC has since updated the GWP values based on the latest science in its

[4] GWPs and associated CO_2e values were developed by the IPCC, and published in its Second Assessment Report (SAR) in 1996. Historically, GHG emission inventories have been calculated using the GWPs from the IPCC's SAR. The IPCC updated the GWP values based on the latest science in its AR4. The CARB reports GHG emission inventories for California using the GWP values from the IPCC AR4.

Fourth Assessment Report (IPCC AR4) and Fifth Assessment Report (IPCC AR5), published in 2007 and 2014, respectively (IPCC 2007; IPCC 2014). By applying the GWP ratios, project-related CO_2e emissions can be tabulated in units of $MTCO_2e$ per year. Large emission sources are reported in million metric tons (MMT) of CO_2e.

According to the California Environmental Protection Agency (CalEPA), the potential impacts in California due to global climate change may include: loss in snow pack; sea-level rise; more extreme heat days per year; more high-ozone days; larger forest fires; more drought years; increased erosion of California's coastlines and sea water intrusion into the Sacramento and San Joaquin Deltas and associated levee systems; and increased pest infestation (CalEPA 2006).

The CARB compiles GHG inventories for the State of California. Based on the 2018 GHG inventory data (i.e., the latest year for which data are available from CARB), California emitted 423.5 $MMTCO_2e$, including emissions resulting from imported electrical power (CARB 2020). The transportation sector is the largest contributor to statewide GHG emissions at approximately 40 percent in 2018.

Impacts of GHGs are borne globally, as opposed to localized air quality effects of criteria air pollutants and TACs. The quantity of GHGs that it takes to ultimately result in climate change is not precisely known; however, it is clear that the quantity is enormous, and no single project would measurably contribute to a noticeable incremental change in the global average temperature, or to global, local, or micro climates. From the standpoint of CEQA, GHG impacts to global climate change are inherently cumulative.

In December 2008, the SCAQMD adopted a 10,000 $MTCO_2e$ per year significance threshold for industrial facilities for projects in which the SCAQMD is the lead agency. Although SCAQMD has not formally adopted a significance threshold for GHG emissions generated by a project for which SCAQMD is not the lead agency, or a uniform methodology for analyzing impacts related to GHG emissions on global climate change, in the absence of any industry-wide accepted standards applicable to this project, the SCAQMD's significance threshold of 10,000 $MTCO_2e$ per year for industrial projects is the most relevant GHG significance threshold and is used as a benchmark for the project. It should be noted that the SCAQMD's significance threshold of 10,000 $MTCO_2e$ per year for industrial projects is intended for long-term operational GHG emissions. The SCAQMD has developed guidance for the determination of the significance of GHG construction emissions that recommends that total emissions from construction be amortized over an assumed project lifetime of 30 years and added to operational emissions, and then compared to the threshold (SCAQMD 2008).

The justification for the threshold is provided in SCAQMD's Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans (SCAQMD 2008). The SCAQMD Interim CEQA GHG Threshold for Stationary Sources identifies a screening threshold to determine whether additional analysis is required. As stated by the SCAQMD:

> *"…the…screening level for stationary sources is based on an emission capture rate of 90 percent for all new or modified projects…the policy objective of [SCAQMD's] recommended interim GHG significance threshold proposal is to achieve an emission capture rate of 90 percent of all new or modified stationary source projects. A GHG significance threshold based on a 90 percent emission capture rate may be more appropriate to address the long-term adverse impacts associated with global climate change because most projects will be required to implement GHG reduction measures. Further, a 90 percent emission capture rate sets the emission threshold low enough to capture a substantial fraction of future stationary source projects that will be constructed to accommodate future statewide population and economic growth, while setting the emission threshold high enough to exclude small projects that will in aggregate contribute a relatively small fraction of the cumulative statewide GHG emissions. This assertion is based on the fact that [SCAQMD] staff estimates that these GHG emissions would account for slightly less than one percent of future 2050 statewide GHG emissions target (85 [MMTCO$_2$e per year]). In addition, these small projects may be subject to future applicable GHG control regulations that would further reduce their overall future contribution to the statewide GHG inventory. Finally, these small sources are already subject to [Best Available Control Technology (BACT)] for criteria pollutants and are more likely to be single-permit facilities, so they are more likely to have few opportunities readily available to reduce GHG emissions from other parts of their facility."*

Thus, based on guidance from the SCAQMD, if an industrial project would emit GHGs less than 10,000 MTCO$_2$e per year, the project would not be considered a substantial GHG emitter and GHG emission impacts would be less than significant, requiring no additional analysis and no mitigation.

CEQA Guidelines 15064.4 (b)(1) states that a lead agency may use a model or methodology to quantify GHGs associated with a project. In late 2017, the SCAQMD in conjunction with the California Air Pollution Control Officers Association (CAPCOA) released the latest version of the CalEEMod (Version 2016.3.2). The purpose of this model is to estimate construction-source and operational-source emissions from direct and indirect sources. Accordingly, the latest version of CalEEMod has been used for this project to estimate the project's emission impacts. As described in Section 2.3 (a), the emissions from worker vehicle trips, haul truck trips, and vendor truck trips were estimated outside of CalEEMod to account for the CARB 2017 on-road vehicle emissions factor (EMFAC2017) model because EMFAC2017 has not yet been incorporated in the current version of CalEEMod.

Construction

Construction activities associated with the project would occur for approximately 4.5 months and would result in emissions of CO_2 and to a lesser extent CH_4 and N_2O. Construction-period GHG emissions were quantified based on the same construction schedule, activities, and equipment list as described in Section 2.3 (b). To amortize the

emissions over the life of the project, the SCAQMD recommends calculating the total GHG emissions attributable to construction activities, dividing it by the 30-year project life, and then adding that number to a project's annual operational-phase GHG emissions. As such, construction emissions were amortized over a 30-year period. As shown in **Table 2-4**, the project construction GHG emissions would not exceed the threshold of significance. Therefore, impacts would be less than significant.

TABLE 2-4
AMORTIZED ANNUAL CONSTRUCTION GHG EMISSIONS

Source	$MTCO_2e$
Off-road Project Emissions	45
On-road Project Emissions	103
Total Project Construction Emissions	**148**
Amortized Project Construction Emissions	**5**
Threshold of significance	**10,000**
Exceed Threshold	**No**

SOURCE: ESA 2020.

Operational Emissions

Operational activities associated with the project would result in minor amounts of GHG emissions. Operational sources of GHG emissions would only generate minor amounts of operational emissions from infrequent truck trips and minimal usage of equipment, as it is estimated that approximately three truck trips per week would enter/exit the storage area and 3 hours of forklift usage per week would occur at the project site. Therefore, GHG emission impacts would be less than significant.

b) **Less than Significant Impact.** Construction and operation of the project would not conflict with plans, policies or regulations adopted for the purpose of reducing the emissions of GHG as discussed below.

Construction

As discussed in Section 2.8 (a), the GHG emissions generated by the project would not exceed the SCAQMD's recommended threshold of 10,000 $MTCO_2e$ per year for industrial projects. The primary source of GHG emissions generated by project implementation would occur during construction, which would be short-term and temporary in nature. The project would use contractors that are in compliance with regulations including the USEPA Heavy Duty Vehicle Greenhouse Gas Regulation, the CARB anti-idling Air Toxics Control Measure that limits heavy-duty diesel motor vehicle idling, and the State's low-carbon fuel standard regulation. While the idling measure was adopted for the purpose of reducing diesel particulate matter emissions and reducing health risk impacts, the measure has co-benefits of minimizing GHG emissions

from unnecessary truck idling. The project would not conflict with these GHG-reducing measures and regulations. Therefore, impacts would be less than significant.

Operations

Operation of the project would generate minor amounts of GHG emissions from infrequent truck trips and minimal usage of equipment, as it is estimated that approximately three truck trips per week would enter/exit the storage area and 3 hours of forklift usage per week would occur at the project site. These equipment and mobile source emissions would only add trace amounts of GHG emissions annually and would have no impact on the implementation of the SCAG Regional Transportation Plan/Sustainable Communities Strategy to reduce GHG emissions from vehicle travel. The project would also have no net effect on long-term water consumption and associated GHG emissions from water supply, conveyance, distribution, and treatment. For these reasons, the implementation of the proposed project would not generate GHG emissions that would hinder the State's ability to achieve the GHG reduction goals under Health and Safety Code Division 25.5 – California Global Warming Solutions Act of 2006. Furthermore, the proposed project would not conflict with or impede the future statewide GHG emission reductions goals. CARB has outlined a number of potential strategies for achieving the 2030 reduction target of 40 percent below 1990 levels. These potential strategies include renewable resources for 60 percent of the State's electricity by 2030, reducing petroleum use in cars and trucks, reducing the carbon content of transportation fuels, continuation of the Cap-and-Trade Program, and adopting regulations for oil refineries. The project would not conflict with these future regulations, as promulgated by the USEPA, CARB, California Energy Commission, or other agency. Impacts would be considered less than significant.

References

California Air Resources Board (CARB), 2020. California Greenhouse Gas 2000-2018 Inventory by Scoping Plan Category – Summary. Available at: https://ww2.arb.ca.gov/ghg-inventory-data. Accessed October 2020.

California Environmental Protection Agency (CalEPA), 2006. Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature.

Intergovernmental Panel on Climate Change (IPCC), 2007. Changes in Atmospheric Constituents and in Radiative Forcing. In: Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the IPCC.

IPCC, 2013. Summary for Policymakers. In: Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the IPCC.

IPCC. 2014. Climate Change 2014 Synthesis Report. Available: http://ipcc.ch/report/ar5/syr/. Accessed June 2020.

South Coast Air Quality Management District (SCAQMD). 2008. Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, October 2008. Available at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2. Accessed June 2020.

2.9 Hazards and Hazardous Materials

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
HAZARDS AND HAZARDOUS MATERIALS — Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☐	☒

Discussion

a, b) **Less than Significant Impact.** Construction activities required for implementation of the proposed project would involve demolition of a two-story structure and auxiliary structures. The proposed construction activities would require equipment that uses hazardous materials such as petroleum fuels and oil. During construction activities, hazardous materials (including hazardous building materials) could accidentally be spilled or otherwise released into the environment and expose construction workers, the public, and/or the environment to potentially hazardous conditions. Construction activities that involve hazardous materials would be governed by several agencies, including the USEPA, Los Angeles Department of Transportation (LADOT), Division of Occupational Safety and Health (Cal/OSHA), and Department of Toxic Substances Control (DTSC). Construction contractors would be required to implement BMPs for handling hazardous materials during construction activities, including following manufacturers' recommendations and regulatory requirements for: use, storage, and disposal of chemical products and hazardous materials used in construction; avoiding

overtopping construction equipment fuel tanks; routine maintenance of construction equipment; and proper disposal of discarded containers of fuels and other chemicals.

Prior to the demolition, a Hazardous Material Survey would be conducted to assess the types and quantities of hazardous materials that may be encountered during the demolition work, including hazardous building materials, such as ACMs and LBP. Materials containing ACMs, LBP, and other hazardous building debris would be removed from the project site prior to the start of demolition activities as required under the California Code of Regulations (CCR) Title 8,

Division 1, Chapter 4, Article 4, Sections 1529 and 5208, for ACMs and under CCR Title 8, Division 1, Chapter 4, Article 4, Section 1532.1 for LBP. The regulations require that all work with these materials must be conducted by a State-certified professional who would be responsible for ensuring compliance with all applicable regulations. If ACMs and/or LBP are determined to exist on-site, a site-specific hazard control plan must be prepared detailing removal methods and specific instructions for providing protective clothing and equipment for abatement personnel. If necessary, a state-certified LBP and an asbestos removal contractor would be retained to conduct the appropriate abatement measures as required by the plan. Wastes from abatement and demolition activities would be disposed of at a landfill licensed to accept such waste. Once all abatement measures have been implemented, the contractor would conduct a clearance examination and provide written documentation to the SCAQMD that testing and abatement have been completed in accordance with all federal, state, and local laws and regulations.

The removal of ACMs is regulated under the SCAQMD Rule 1403, Asbestos Emissions from Demolition/Renovation Activities, which specifies work practices to limit asbestos emissions from building demolition and renovation activities, including the removal and disturbance of ACMs. This rule is generally designed to protect workers conducting demolition or renovation activities from exposure to asbestos emissions. Rule 1403 requires surveys of any facility being demolished or renovated for the presence of all friable and Class I and Class II non-friable ACM, and provides the definition of those classes. Rule 1403 establishes notification procedures, removal procedures, handling operations, and warning label requirements. Approved procedures for ACM removal to protect surrounding uses and people identified in Rule 1403 include HEPA filtration, the glovebag method, wetting, and some methods of dry removal.

All other hazardous materials determined to be present during the Hazardous Material Survey would be handled in accordance with all federal, state, and local laws and regulations, and disposed of at the appropriate waste disposal facility.

Compliance with applicable federal, state, and local standards is required; therefore, construction impacts related to the transport, use, or disposal of hazardous materials or accidental release of hazardous materials would be considered less than significant.

Once construction activity is complete, the project site would be used for open air storage for construction equipment and other supplies to support wellfield storage at the adjacent property. Operation and maintenance of the storage area would require approximately three trucks per week to enter/exit the project site. As such, operation of the proposed project would include the transport and storage of hazardous materials, such as petroleum fuels and oil, at the project site. During operation activities, hazardous materials could accidentally be spilled or otherwise released into the environment exposing workers, the public and/or the environment to potentially hazardous conditions. The proposed project is required to comply with applicable federal, state, and local standards, and LADWP is required to implement BMPs for handling hazardous materials during operation activity. Therefore, operation related impacts in regards to the transport, use, or disposal of hazardous materials or accidental release of hazardous materials including hazardous building materials would be considered less than significant.

c) **No Impact.** The proposed project is not located within 0.25 miles of any existing or proposed schools. The nearest school to the project is Mann UCLA Community School (7001 St. Andrews Place, Los Angeles, CA 90047) located approximately 0.5 miles south of the project. No impact would occur.

d) **Less than Significant Impact.** Government Code Section 65962.5 requires CalEPA to develop and annually update the Hazardous Waste and Substances Sites (Cortese) List. The information contained in the Cortese List is provided by DTSC and other state and local government agencies. A review of the DTSC EnviroStor and State Water Resources Control Board (SWRCB) GeoTracker databases did not indicate any hazardous waste facilities within the project site (DTSC 2020; SWRCB 2020a). An open Leaking Underground Storage Tank (LUST) cleanup site is located approximately 0.3 miles southeast of the project site, at 6300 Western Avenue. However, the LUST site is listed as eligible for closure as of February 27, 2020; SWRCB determined that the site has a low threat for groundwater contamination from gasoline, and will close the site pursuant to the SWRCB Low Threat Case Closure Policy following destruction of the monitoring wells (SWRCB 2020b). A Phase I Environmental Site Assessment was conducted for the project site that included an assessment of the potential impacts of the LUST site to the project. The assessment concluded that although operation of the former furniture manufacturing facility at the project site included use of spray paint, no spills or releases were reported at the site. The potential impact of former spray painting operations and of the LUST site to groundwater beneath the project area was determined to be unknown. The project would only include minor grading and would not include soil removal or impacts to groundwater. Because only minor grading activities are proposed for the project, no further investigations would be required. Based on the results of the Phase I Environmental Site Assessment, implementation of the proposed project would not pose a hazardous threat to the public or environment. Impacts would be less than significant.

e) **No Impact.** The proposed project is not located within an airport land use plan or within 2 miles of a public airport, public use airport, or private airstrip. The nearest public airport is the Los Angeles International Airport (LAX) located approximately 6.2 miles

southwest of the project site. Therefore, no impact related to airport-related hazardous would occur.

f) **No Impact.** The sections of S. St. Andrews Place and Gage Avenue that front the project are not designated as Selected Disaster Routes on the City of Los Angeles Safety Element's Critical Facilities & Lifeline Systems Map (City of Los Angeles 1996). In addition, the proposed project would not include road closures that could impact the travel of emergency vehicles. Operational activities would occur entirely within the project parcel and would not impact emergency access. No impacts would occur.

g) **No Impact.** The proposed project would be located within a highly urbanized area, and would continue to be served by the Los Angeles Fire Department. According to the California Department of Forestry and Fire Protection (CAL FIRE) (CAL FIRE 2007; CAL FIRE 2011) the project site would not be located in an area classified as a Very High Fire Hazard Severity Zone. In addition, the City of Los Angeles Safety Element's Selected Wildfire Hazard Areas in the City of Los Angeles map indicates that the project site is not located in the Mountain Fire District nor within a fire buffer zone (City of Los Angeles 1996). The proposed project would not expose people or structures to hazards related to wildlife fires. No impact would occur.

References

California Department of Forestry and Fire Protection (CAL FIRE), 2007. Fire Hazard Severity Zones in State Responsibility Areas Map. Available at: https://osfm.fire.ca.gov/media/6636/fhszs_map.pdf. Accessed April 20, 2020.

CAL FIRE, 2011. Los Angeles Very High Fire Hazard Severity Zones in LRA Map. Available at: https://osfm.fire.ca.gov/media/5830/los_angeles.pdf. Accessed April 20, 2020.

City of Los Angeles, 1996. City of Los Angeles General Plan, Safety Element. Available at: https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf. Accessed May 19, 2020.

Department of Toxic Substances Control (DTSC). EnviroStor Database. Available at: http://www.envirostor.dtsc.ca.gov/public/. Accessed June 1, 2020.

Los Angeles Department of Water and Power (LADWP), 2017. *Phase I Environmental Site Assessment. 6236 South St. Andrews Place. Assessor's ID Number: 6001-016-015. Los Angeles, California*. April 17, 2017.

State Water Resources Control Board (SWRCB), 2020a. GeoTracker. Available at: https://geotracker.waterboards.ca.gov/. Accessed June 1, 2020.

SWRCB, 2020b. SWRCB Staff Letter to the City of Los Angeles. "Underground Storage Tank Program – Well Destruction Requirement," April 30, 2020. Available at: https://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T10000008789. Accessed June 1, 2020.

2.10 Hydrology and Water Quality

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY — Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Discussion

a) **Less than Significant Impact.** Construction of the proposed project would involve minor excavation. Sediment associated with earthmoving activities and exposed soil would have the potential to erode and be transported to downgradient areas, potentially resulting in water quality standard violations. In the event of heavy rain, erosion of stockpiles may occur resulting in scouring and sedimentation of local drainages. Additionally, stormwater passing through the construction site has the potential to pick up construction-related chemicals (such as fuels or oils from construction equipment), and toxic materials from demolished structures (such as LBP or asbestos) that may pass into the local stormwater collection system, impacting water quality. However, the proposed project would be required to prepare a project-specific SWPPP to minimize soil erosion. The SWPPP would identify site-specific BMPs to control erosion, sediment, and other potential construction-related pollutants. Compliance with the SWPPP would maintain water quality in accordance with the Regional Water Quality Control Board standards such that construction of the proposed project would not violate any water quality standards. Therefore, implementation of the SWPPP would ensure construction

impacts related to water quality standards or waste discharge requirements would be less than significant.

Once construction is completed, the proposed project would be used for open air storage similar to the adjacent LADWP wellfield property. No new structures would be implemented within the project site, operation of the proposed project would not conflict with any water quality standards or waste discharge requirements, and impacts would be less than significant.

b) **No Impact.** The proposed project would include the demolition of an existing two-story structure and auxiliary structures, and future use of the project site for open air storage. Excavation to a depth of approximately 60 inches would be required to remove the footings of the structure being demolished. The proposed project would not impact groundwater or interfere with groundwater recharge. No impact would occur.

c) **Less than Significant Impact.** Construction of the proposed project would temporarily alter the localized drainage pattern in the project area due to ground-disturbing activities, such as grading and excavation, and demolition. Such alterations in the drainage pattern may temporarily result in erosion or siltation and/or increase the rate or amount of surface runoff if substantial drainage is rerouted. However, as discussed above in Section 2.10 (a), implementation of the required project-specific SWPPP would minimize the potential for erosion or siltation and flooding through the implementation of BMPs. Therefore, impacts associated with substantial erosion and temporary drainage alterations, including flooding during construction, would be less than significant.

Once construction is complete and the existing structures are removed, the project site would be used for open air storage and would not be paved. No new structures or impervious surfaces would be constructed on the proposed project site. As a result, the proposed project would not substantially alter the existing drainage pattern or substantially increase surface runoff. Therefore, impacts associated with substantial erosion or drainage alterations, including flooding during operation, would be less than significant.

d) **Less than Significant Impact.** The southwest portion of the project site is located on land that is designated by the Federal Emergency Management Agency (FEMA) as a 100-year flood hazard area and northeast portion of the project site is located on a 500-year flood hazard area (FEMA 2018). Additionally, the City of Los Angeles General Plan identifies the project site as a potential inundation zone (City of Los Angeles 1996). Potential inundation of the project site would have the potential to release chemicals (such as those from fuels or oils from construction equipment) from the project site during demolition/construction and toxic materials (such as LPB or asbestos) from demolished structures. However, the proposed project would be required to prepare a project-specific SWPPP to minimize the potential for pollutant runoff in the event flooding/inundation occurs. The SWPPP would identify site-specific BMPs to control erosion, sediment, and other potential construction-related pollutants. Compliance with

the SWPPP would maintain water quality in accordance with the Regional Water Quality Control Board standards such that construction of the proposed project would not violate any water quality standards. Therefore, implementation of the SWPPP would ensure construction would not violate water quality standards or waste discharge requirements. Impacts related to flooding and pollutant release are considered less than significant.

The project area is not located near the ocean, nor is it located within a tsunami hazard area (City of Los Angeles 1996). There are no harbors, bays, lakes, rivers, or canals in close proximity to the project site that could expose the project site to impacts related to a seiche event. Therefore, no impact related to seiches or tsunamis would occur.

e) **No Impact.** The project would include the demolition of an existing two-story structure and auxiliary structures, and future use of the project site for open air storage. The project would not impact groundwater during construction or operation. No impacts would occur.

References

City of Los Angeles, 1996. City of Los Angeles General Plan, Safety Element, Adopted September 2001. Available at: https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf. Accessed May 26, 2020.

Federal Emergency Management Agency (FEMA), 2018. FEMA Flood Map Service Center. Available at: https://msc.fema.gov/portal/search?#searchresultsanchor. Accessed May 26, 2020.

2.11 Land Use and Planning

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
LAND USE AND PLANNING — Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

Discussion

a) **No Impact.** The physical division of an established community typically refers to the construction of a linear feature, such as a highway or railroad, or removal of a means of access, such as a road or bridge that would impact mobility within or between existing communities. The proposed project would include the demolition of an existing two-story structure and auxiliary structures, and future use of the project site for open air storage. The proposed project would not divide an established community. No impact would occur.

b) **No Impact.** The project site is designated for Light Industrial land use in the South Los Angeles Community Plan and is zoned as Light Industrial (M2) (City of Los Angeles 2017; City of Los Angeles 2020). The M2 zoning designation allows for the open storage of materials and equipment at the project site, provided that storage is contained to an area that is "enclosed with a solid fence not less than eight feet in height," and provided that equipment is not stored to a height which exceeds the solid fence, among other limitations described in Article 2, Section 12.19 Municipal Code (City of Los Angeles 1974). To comply with these requirements, the project would construct an 8-foot chain-link fence with privacy slats or other privacy cover around the perimeter of the property prior to use of the project site for open storage of LADWP equipment, and stored materials and equipment would comply with applicable height requirements. The proposed project would not conflict with land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental impact. No impact would occur.

References

City of Los Angeles 1974. Los Angeles Municipal Code. Section 12.19 "M2" Light Industrial Zone, Amended by Ord. no. 146,030, Eff. July 11, 1974. Available at: http://library.amlegal.com/nxt/gateway.dll/California/lapz/municipalcodechapteriplanningandzoningco/chapterigeneralprovisionsandzoning/article2specificplanning-zoningcomprehen/sec1219m2lightindustrialzone?f=templates$fn=default.htm$3.0$vid=amlegal:lapz_ca$anc=JD_12.19. Accessed May 21, 2020.

City of Los Angeles, 2017. South Los Angeles Community Plan. Available at: https://planning.lacity.org/odocument/b909e749-754e-4caa-af7f-14c82adaa2b7/South_Los_Angeles_Community_Plan.pdf. Accessed May 13, 2020.

City of Los Angeles, 2020. Zone Information and Map Access System (ZIMAS). Available at: https://planning.lacity.org/zoning/zoning-map. Accessed May 13, 2020.

2.12 Mineral Resources

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
MINERAL RESOURCES — Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

Discussion

a) **No Impact.** According to maps prepared by the CGS in accordance with the California Surface Mining and Reclamation Act of 1975, the project site is in an area that is classified as MRZ-1. The MRZ-1 classification designates areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence (California Department of Conservation, Division of Mines and Geology 1994). According to the Geology Energy Management Division Well Statewide Tracking and California Geologic Energy Management Division (CalGEM) Reporting System (WellSTAR) database, there are no oil wells that exist on the project site (California Department of Conservation CalGEM 2020). Therefore, the proposed project would not result in the loss of availability of a known mineral resource, and no impact would occur.

b) **No Impact.** The project site is not used for mineral extraction and is not known as a locally important resource recovery site. Further, the project site is not delineated on the City of Los Angeles or South Los Angeles Community Plans or any other land use plan for mineral resource recovery uses. Therefore, no impact would occur.

References

California Department of Conservation, Division of Mines and Geology, 1994. Update of Mineral Land Classification of Portland Cement Concrete Aggregate in Ventura, Los Angeles, and Orange Counties, California, Part II – Los Angeles County, Miller R. V., Open File Report 94-14. Plate 1B Map. Available at: ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR_94-14/OFR_94-14_Plate1B.pdf. Accessed May 18, 2020.

California Department of Conservation CalGEM, 2020, WellSTAR Database. Available at: https://www.conservation.ca.gov/calgem/Pages/Wellfinder.aspx. Accessed May 18, 2020.

2.13 Noise

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
NOISE — Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Discussion

a) **Less than Significant Impact with Mitigation.** Noise is defined as unwanted sound; however, not all unwanted sound rises to the level of a potentially significant noise impact. To differentiate unwanted sound from potentially significant noise impacts, the City of Los Angeles has established noise regulations. The following analysis evaluates potential noise impacts at noise-sensitive land uses in each jurisdiction resulting from construction and operation of the project. As discussed below, the construction and operation of the project would not generate noise levels in excess of local standards and impacts would be less than significant.

Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air). Noise is generally defined as unwanted sound (i.e., loud, unexpected, or annoying sound). Acoustics is defined as the physics of sound. In acoustics, the fundamental scientific model consists of a sound (or noise) source, a receiver, and the propagation path between the two. The loudness of the noise source and obstructions or atmospheric factors affecting the propagation path to the receiver determines the sound level and characteristics of the noise perceived by the receiver. Acoustics addresses primarily the propagation and control of sound.

Sound, traveling in the form of waves from a source, exerts a sound pressure level (referred to as sound level) that is measured in decibels (dB), which is the standard unit of sound amplitude measurement. The dB scale is a logarithmic scale (i.e., not linear) that describes the physical intensity of the pressure vibrations that make up any sound, with 0 dB corresponding roughly to the threshold of human hearing and 120 to 140 dB corresponding to the threshold of pain. In a non-controlled environment, a change in sound level of 3 dB is considered “just perceptible,” a change in sound level of 5 dB is considered “clearly noticeable,” and a change in 10 dB is perceived as a doubling of

sound volume (Caltrans 2013a). Pressure waves traveling through air exert a force registered by the human ear as sound.

The typical human ear is not equally sensitive to all frequencies of the audible sound spectrum. As a consequence, when assessing potential noise impacts, sound is measured using an electronic filter that deemphasizes the frequencies below 1,000 hertz (Hz) and above 5,000 Hz in a manner corresponding to the human ear's decreased sensitivity to extremely low and extremely high frequencies. This method of frequency weighting is referred to as A-weighting and is expressed in units of A-weighted decibels (dBA). A-weighting follows an international standard methodology of frequency de-emphasis and is typically applied to community noise measurements.

An individual's noise exposure is a measure of noise over a period of time, whereas a noise level is a measure of noise at a given instant in time. Community noise varies continuously over a period of time with respect to the contributing sound sources of the community noise environment. Community noise is primarily the product of many distant noise sources, which constitute a relatively stable background noise exposure, with the individual contributors unidentifiable. The background noise level changes throughout a typical day, but does so gradually, corresponding with the addition and subtraction of distant noise sources such as traffic. What makes community noise variable throughout a day, besides the slowly changing background noise, is the addition of short-duration, single-event noise sources (e.g., aircraft flyovers, motor vehicles, sirens), which are readily identifiable to the individual. These successive additions of sound to the community noise environment change the community noise level from instant to instant, requiring the measurement of noise exposure over a period of time to legitimately characterize a community noise environment and evaluate cumulative noise impacts.

The time-varying characteristic of environmental noise over specified periods of time is described using statistical noise descriptors in terms of a single numerical value, expressed as dBA. The most frequently used noise descriptors are summarized below:

Leq: The Leq, or equivalent sound level, is used to describe the noise level over a specified period of time, typically 1-hour, i.e., Leq(1), expressed as Leq. The Leq may also be referred to as the "average" sound level.

Lmax: The maximum, instantaneous noise level.

Lmin: The minimum, instantaneous noise level.

Lx: The noise level exceeded for specified percentage (x) over a specified time period; i.e., L50 and L90 represent the noise levels that are exceeded 50 and 90 percent of the time specified, respectively.

Ldn: The Ldn is the average noise level over a 24-hour period, including an addition of 10 dBA to the measured hourly noise levels between the hours of 10:00 P.M. to 7:00 A.M. to account nighttime noise sensitivity. Ldn is also termed the day-night average noise level or DNL.

CNEL: Community Noise Equivalent Level (CNEL), is the average noise level over a 24-hour period that includes an addition of 5 dBA to the measured hourly noise levels between the evening hours of 7:00 P.M. to 10:00 P.M., and an addition of 10 dBA to the measured hourly noise levels between the nighttime hours of 10:00 P.M. to 7:00 A.M. to account for noise sensitivity during the evening and nighttime hours, respectively.

City of Los Angeles Municipal Code

The City of Los Angeles Noise Regulation is provided in Chapter XI of the LAMC and establishes acceptable ambient sound levels to regulate intrusive noises within specific land use zones and provides procedures and criteria for the measurement of the sound level of noise sources. These procedures recognize and account for differences in the perceived level of different types of noise and/or noise sources.

Section 111.01 and Section 111.03 of the LAMC define the ambient noise as the actual measured ambient noise level or the City's presumed ambient noise level, whichever is greater. The actual ambient noise level is the measured noise level averaged over a period of at least 15 minutes Leq.

Section 111.02 of the LAMC provides procedures and criteria for the measurement of the sound level of "offending" noise sources. In accordance with the LAMC, a noise level increase of 5 dBA over the existing average ambient noise level at an adjacent property line is considered a noise violation. To account for people's increased tolerance for short-duration noise events, the Noise Regulation provides a 5 dBA allowance for noise occurring more than 5 but less than 15 minutes in any 1-hour period and an additional 5 dBA allowance (total of 10 dBA) for noise occurring 5 minutes or less in any 1-hour period.

Section 112.05 of the LAMC sets a maximum noise level for construction equipment of 75 dBA at a distance of 50 feet when operated within 500 feet of a residential zone. Compliance with this standard is required only where "technically feasible."

Section 41.40 of the LAMC prohibits construction between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, 6:00 P.M. and 8:00 A.M. on Saturday, and at any time on Sunday (i.e., construction is allowed Monday through Friday between 7:00 A.M. to 9:00 P.M.; and Saturdays and National Holidays between 8:00 A.M. to 6:00 P.M.). In general, the City's Department of Building and Safety enforces noise ordinance provisions relative to equipment and the Los Angeles Police Department enforces provisions relative to noise generated by people.

Construction

As discussed in Chapter 1, *Project Description*, the project would include the demolition of a 64,434 square-foot, 26-foot-tall, two-story structure. The structure's footprint is approximately 38,484 feet. In addition, the proposed project would remove a 456-square-foot auxiliary structure, a concrete wall along the northern property line, and 10 posts located on the paved portion of the site, which were previously used as truck charging

stations. Once demolition is complete and the site is cleared of debris, a new chain-link fence with privacy slats would be constructed along the perimeter of the property. Project construction is expected to commence in August 2021 and would take approximately 4.5 months to complete. As described in Section 2.3 (b), maximum daily activities would involve up to two crews working simultaneously, with specified crews based on the different tasks. The construction schedule received from LADWP was used in the noise impact analysis, where it assumes one crew per task, with two crews overlapping during installation of pedestrian protection and fencing and salvaging of construction materials, and two crews partially overlapping during the removal of wood framing and removal of walls. The analysis includes consideration of construction noise effects on noise-sensitive receivers in the vicinity of the project site due to the use of construction equipment (on-site construction activities) and haul trucks (off-site construction activities).

The project site is located on a 1.1-acre parcel north of Gage Avenue and east of St. Andrews Place. The closest sensitive receptors are residential uses located approximately 50 feet or more to the south of the project site, south of Gage Avenue.

On-Site Construction Activities

Noise from on-site construction activities would be generated by the use of equipment involved during various stages of construction activities. The noise levels generated by construction equipment would vary depending on factors such as the type and number of equipment, the specific model (horsepower rating), the construction activities being performed, and the maintenance condition of the equipment. Individual pieces of construction equipment anticipated to be used during project construction could produce maximum noise levels of 78 dBA to 89 dBA Lmax at a reference distance of 50 feet from the noise source, as shown in **Table 2-5**. These maximum noise levels would occur when equipment is operating under full power conditions. The estimated usage factor for the equipment is also shown in Table 2-5. The usage factors are based on the Federal Highway Administration (FHWA) Roadway Construction Noise Model User's Guide (FHWA 2006).

TABLE 2-5
CONSTRUCTION EQUIPMENT AND ESTIMATED NOISE LEVELS

Source	Estimated Usage Factor (%)	Reference Noise Level at 50 feet (dBA Lmax)
Air Compressor	40%	78
Auger Drill Rig	20%	84
Generator Set	50%	81
Jackhammer	20%	89
Roller	20%	80
Loader	40%	79

SOURCE: FHWA 2006

To characterize construction-period noise levels, the hourly Leq noise level associated with each construction phase is estimated based on the quantity, type, and usage factors for each type of equipment used during each construction phase and are typically attributable to multiple pieces of equipment operating simultaneously. Over the course of a construction day, the highest noise levels would be generated when multiple pieces of construction equipment are operated concurrently.

The estimated noise levels at noise-sensitive receptors were calculated based on a maximum concurrent operation of construction equipment, which is considered a worst-case evaluation because the project would typically use less equipment simultaneously, and as such would generate lower noise levels. Noise calculation worksheets are included the Noise and Vibration Technical Report attached as **Appendix C**. The nearest sensitive receptors to the construction areas would be single family and multi-family residential uses located south of the project site across Gage Avenue in the City of Los Angeles. **Table 2-6** shows the estimated maximum construction noise levels that would occur at the nearest off-site sensitive uses during a peak day of construction activity. As shown, construction noise levels were estimated to reach a maximum of 91 dBA Leq at 50 feet during the Removal of Foundation, 79 dBA Leq at 50 feet during the combined Installation of Pedestrian Protection and Fencing and Salvaging of Construction Materials, and 78 dBA Leq at 50 feet during the combined Removing of Wood Frame and Removal of Walls, which would exceed the standard for construction equipment of 75 dBA at a distance of 50 feet when operated within 500 feet of a residential zone. However, this increase would only occur for a temporary duration at a sensitive receptor location as construction activities would occur across the project site. In addition, construction activities would only occur at the site for a period of approximately 2.5 months; therefore, construction-related noise would be experienced by nearby sensitive receptors for only a relatively short duration. Although construction noise impacts are expected to be limited in duration, construction noise levels could exceed the established thresholds at the nearest sensitive receptors as shown on Table 2-6.

TABLE 2-6
UNMITIGATED MAXIMUM CONSTRUCTION NOISE LEVELS AT SENSITIVE RECEPTORS

Source	Estimated Distance (feet)	Noise Level (dBA Leq)
Demolition		
Mobilization and Capping of Utilities	50	78
Hazardous Materials Remediation	50	78
Installation of Pedestrian Protection and Fencing	50	77
Salvaging of Construction Materials	50	75
Removal of Wood Framing	50	75
Removal of Walls	50	75
Removal of Foundation	50	91
Backfilling and Minor Grading	50	79
Cleanup and Removal of Fencing	50	77
Demolition Finish	50	0
Overlap of Installation of Pedestrian Protection and Fencing and Salvaging of Construction Materials	50	79
Overlap of Removal of Wood Framing and Removal of Walls	50	78
Maximum Noise Level	**50**	**91**
Significance Threshold	**50**	**75**

NOTES:
A) Construction schedule provided by LADWP.
B) Detailed construction noise calculations are provided in Appendix C.
SOURCE: ESA 2020

Implementation of **Mitigation Measures NOI-1, NOI-2**, and **NOI-3** would reduce construction noise levels by a minimum of 20 dBA to the extent technically possible. **Mitigation Measure NOI-4** would require noticing of residences prior to construction. As shown in **Table 2-7**, with incorporation of **Mitigation Measures NOI-1 through NOI-4**, construction noise levels were estimated to reach a maximum of 71 dBA Leq at 50 feet during the Removal of Foundation phase. This estimated noise level would not exceed the standard set forth in LAMC Section 112.05, which sets a maximum noise level for construction equipment of 75 dBA at a distance of 50 feet when operated within 500 feet of a residential zone. Therefore, the short-term construction noise impacts would be mitigated to less than significant.

TABLE 2-7
MITIGATED MAXIMUM CONSTRUCTION NOISE LEVELS AT SENSITIVE RECEPTORS

Construction Phase	Distance (ft)	dBA, Leq
Mobilization and Capping of Utilities	50	58
Hazardous Materials Remediation	50	58
Installation of Pedestrian Protection and Fencing	50	57
Salvaging of Construction Materials	50	55
Removal of Wood Framing	50	55
Removal of Walls	50	55
Removal of Foundation	50	71
Backfilling and Minor Grading	50	59
Cleanup and Removal of Fencing	50	57
Demolition Finish	50	0
Overlap of Installation of Pedestrian Protection and Fencing and Salvaging of Construction Materials	50	59
Overlap of Removal of Wood Framing and Removal of Walls	50	58
Maximum Combined Noise Levels	50	**71**
Significance Threshold	**50**	**75**

NOTES:
A) Construction schedule provided by LADWP.
B) Detailed construction noise calculations are provided in Appendix C.
SOURCE: ESA 2020

As mentioned above, Section 41.40 of the LAMC prohibits construction between the hours of 9:00 P.M. and 7:00 A.M., Monday through Friday, 6:00 P.M. and 8:00 A.M. on Saturday, and at any time on Sunday (i.e., construction is allowed Monday through Friday between 7:00 A.M. to 9:00 P.M.; and Saturdays and National Holidays between 8:00 A.M. to 6:00 P.M.). The project construction workday would start at 6:00 A.M. and end at 5:00 P.M. Monday through Friday, and no construction would occur on the weekends. However, no noise generating construction activities would occur on-site between 6:00 A.M and 7:00 A.M as the initial hour of the workday would be used for setting up activities, planning and personnel meetings, and other similar activities. In addition, no operation of off-road equipment and truck loading activities would occur until 7:00 A.M. Therefore, as the project would be in compliance with applicable noise standards established in the LAMC, construction noise impacts would be considered less than significant.

Off-Site Construction Activities

On-road trucks would be used to transport materials to and from the construction areas. Trucks would travel past noise-sensitive residential uses along Gage Avenue in the City of Los Angeles. However, the number of trucks would be minimal at approximately 25 trucks per day (3 trucks during a peak hour is assumed in the analysis). The temporary addition of this number of trucks per day during construction activities would result in a

peak hour noise level of 53.6 dBA Leq and CNEL of 54.1 dBA at 20 feet from the roadway (or approximately 35 feet from the centerline based on a 30-foot roadway width typical of roadways in the vicinity of the project site). The ambient noise levels at the roadways around the project site analyzed in the City of Los Angeles Citywide General Plan Framework FEIR is 55.0 dBA CNEL at 20 feet from the roadway (City of Los Angeles 1996). At 54.1 dBA CNEL, the project's temporary noise from truck travel would contribute to increased noise levels to 57.6 dBA Leq on any given roadway around the project area during construction, which would not exceed the threshold of 60.0 dBA Leq. Therefore, the off-site construction traffic noise impacts would be less than significant.

Operations

As discussed in Chapter 1, *Project Description*, the project would demolish a two-story structure and auxiliary structures, and the project site would be used for open air storage. The existing noise environment surrounding the project site is dominated by traffic noise from nearby roadways. Once construction is completed, the proposed project site would be used by LADWP as open air storage, and operation of the project would not result in a net increase in operational noise levels. The project would require approximately three truck trips per week and 3 hours of forklift usage per week at the project site. Given the infrequent truck trips and minimal usage of equipment, project operation would not result in an audible increase in noise levels. As such, operation of the project would result in a less than significant impact.

Mitigation Measures

NOI-1: For construction activities adjacent to noise-sensitive receptors (e.g., residences), the contractor shall ensure that all construction equipment, fixed or mobile, are equipped with properly operating and maintained noise-shielding and muffling devices, consistent with manufacturers' standards. The contractor shall use muffler systems (e.g., absorptive mufflers) that provide a minimum reduction of 5 dBA compared to the same equipment without an installed muffler system, reducing maximum construction noise levels. The contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturers' specifications. The contractor shall also keep documentation on-site verifying compliance with this measure.

NOI-2: For construction activities adjacent to noise-sensitive receptors (e.g., residences) along West Gage Avenue, where physically and technically feasible, the contractor shall provide a temporary fence or other barrier with a performance standard of achieving a 15 dBA noise level reduction at the residential receptors to the south. A 16-foot tall temporary fence or other barrier shall be used along West Gage Avenue extending approximately 100 feet from the S. St. Andrews Place intersection. A minimum 8-foot tall temporary fence or other barrier shall be used in all other areas along the project site's southern boundary along West Gage Avenue. The temporary fence or barrier shall be used during peak noise-generating construction phases when the use of heavy equipment is prevalent. A noise barrier is not required if it would pose a safety risk or unreasonably prevent access to the construction area as deemed by the

on-site construction manager, such as in areas that have limited equipment-maneuvering space or access.

NOI-3: Limit engine idling of construction equipment (e.g., haul trucks, loaders) to a minimum of 200 feet from any boundary of the nearest sensitive receptors.

NOI-4: Prior to commencement of construction activities, LADWP shall notify in writing adjacent residents and businesses near the project site, including the residents along Gage Avenue south of the project site, of proposed construction activities and the tentative schedule. The notices shall also provide a contact person and hotline where local residents or business owners can call during active construction with questions or comments. LADWP shall respond to inquiries regarding construction noise and vibration.

In addition, LADWP shall provide a construction site notice that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

b) **Less than Significant Impact.** The project would be constructed using typical construction techniques and would use impact equipment, such as jackhammers. As such, it is anticipated that the equipment to be used during construction would generate groundborne vibration.

Ground-borne vibration is primarily generated from the use of construction equipment and from heavy-duty vehicle traffic and trains. Ground-borne vibration propagates from the source through the ground to adjacent buildings by surface waves. Vibration energy dissipates as it travels through the ground, causing the vibration amplitude to decrease with distance away from the source. Vibration in buildings is typically perceived as rattling of windows, shaking of loose items, or the motion of building surfaces. The vibration of building surfaces also can be radiated as sound and heard as a low-frequency rumbling noise, known as ground-borne noise. Vibration levels for potential structural damage is described in terms of the peak particle velocity (PPV) measured in inches per second (in/sec). Road vehicles rarely create enough ground-borne vibration amplitude to be perceptible to humans unless the receiver is in immediate proximity to the source or the road surface is poorly maintained and has potholes or bumps.

Human sensitivity to vibration varies by frequency and by receiver. Generally, people are more sensitive to low-frequency vibration. Human annoyance also is related to the number and duration of events; the more events or the greater the duration, the more annoying it becomes. Ground-borne vibration related to human annoyance is generally related to root mean square (rms) velocity levels and expressed as velocity in decibels (VdB).

The City of Los Angeles does not address vibration in the City's municipal code or general plan noise elements. Thus, for this project, the Federal Transit Authority's (FTA's) criteria for structural damage and human annoyance is used. With respect to ground-borne vibration from construction activities, the California Department of Transportation (Caltrans) has adopted guidance to limit ground-borne vibration based on the age and/or condition of the structures that are located in close proximity to construction activity. With respect to residential and commercial structures, the FTA, provides a vibration damage potential criterion for continuous/frequent intermittent vibration sources of 0.5 in/sec PPV for Category I, Reinforced-concrete, steel, or timber (no plaster) buildings, which includes newer residential structures and modern industrial/commercial buildings and 0.2 in/sec PPV for Category III, Non-engineered timber and masonry buildings, which includes older residential structures (FTA 2018). The guidance also provides an 80 VdB threshold for construction and operational vibration impacts associated with human annoyance for infrequent events (FTA 2018) (see Appendix C for additional details).

Construction

According to the FTA, ground vibrations from construction activities very rarely reach the level that can damage structures. A possible exception is the case of old, fragile buildings of historical significance where special care must be taken to avoid damage (FTA 2006). The construction activities that typically generate the most severe vibrations are blasting and impact pile driving, which would not be utilized for the project. The project would utilize construction equipment such as use of loaded trucks and jackhammers, which would generate ground-borne vibration during construction activities. The vibration velocities at various distances for several types of construction equipment that can generate perceptible vibration levels are identified in **Table 2-8**. Based on the information presented in Table 2-8, vibration velocities could range from 0.003 to 0.089 in/sec PPV at 25 feet from the source of activity.

TABLE 2-8
VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT

	Approximate PPV (in/sec)						
Equipment	**25 Feet**	**50 Feet**	**60 Feet**	**75 Feet**	**100 Feet**	**200 Feet**	**300 Feet**
Bore/Drill Rig	0.0890	0.0361	0.0285	0.0213	0.0147	0.0060	0.0035
Loaded Trucks	0.0760	0.0309	0.0244	0.0182	0.0125	0.0060	0.0035
Jackhammer	0.0350	0.0142	0.0112	0.0084	0.0058	0.0051	0.0030
Small Bulldozer	0.0030	0.0012	0.0010	0.0007	0.0005	0.0023	0.0014

SOURCE: FTA 2018; ESA 2020.

Proposed construction activities would occur throughout the project site and would not be concentrated at the point closest to the nearest structure. Based on the vibration levels presented in Table 2-8, at a distance of 10 feet from the vibration source, the maximum

vibration level would be up to approximately 0.352 in/sec PPV for a drill rig, which would not exceed the significance threshold of 0.5 in/sec PPV. Therefore, the use of all construction equipment would not result in a groundborne vibration velocity levels above 0.5 inches per second at the nearest off-site structure and impacts would be less than significant. With respect to human annoyance, the nearest residential buildings are located approximately 50 feet from the project site and would be exposed to vibration levels at approximately 78 VdB which is not above the 80 VdB threshold for human annoyance. Therefore, impacts would be less than significant. Based on this assessment, construction vibration impacts would be less than significant.

Operations

Once construction activities have been completed, there would be no substantial sources of vibration activities from operation of the project. The project would not include new stationary sources of vibration. The approximately three truck trips per week entering/exiting the storage area and 3 hours of forklift usage per week would not generate perceptible vibration levels that would cause structural damage or human annoyance. Therefore, vibration impacts during project operation would be less than significant.

c) **No Impact.** The project would not locate noise-sensitive uses within an airport land use plan area or within 2 miles of a public airport or public use airport. In addition, the project would not locate noise-sensitive uses within the vicinity of a private airstrip, or heliport or helistop. Therefore, the project would not result in an exposure of noise-sensitive uses to excessive noise levels from such uses. No impact would occur.

References

California Department of Transportation (Caltrans), 2013a. Technical Noise Supplement (TeNS), Section 2.2.1, September 2013. Available at: http://www.dot.ca.gov/env/noise/docs/tens-sep2013.pdf. Accessed June 2020.

Caltrans, 2013b. Transportation and Construction Vibration Guidance Manual, September 2013. Available at: http://www.dot.ca.gov/env/noise/docs/tcvgm-sep2013.pdf. Accessed June 2020.

City of Los Angeles, Los Angeles Citywide General Plan Framework Final Environmental Impact Report, June 1996. Available at: https://planning.lacity.org/eir/LA%20citywide%20GP%20Fmwk/FrameworkFEIR.pdf. Accessed June 2020.

Federal Highway Administration (FHWA), 2006. Roadway Construction Noise Model – RCNM and User Guide, January 2006. Available at: https://www.fhwa.dot.gov/environment/noise/construction_noise/rcnm/. Accessed June 2020.

Federal Transit Administration, 2006. Transit Noise and Vibration Impact Assessment, May 2006. Available at: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf. Accessed June 2020.

Federal Transit Administration (FTA), 2018. Transit Noise and Vibration Impact Assessment Manual.

2.14 Population and Housing

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
POPULATION AND HOUSING — Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Discussion

a) **No Impact.** The project does not include housing or commercial development that would directly affect the number of residents or employees in the area and would not contribute to the creation of additional housing or jobs in the City of Los Angeles. The project would not directly or indirectly induce growth or remove an obstacle to growth, since the proposed project would be implemented to create an open air storage area that would supplement existing storage on an adjacent LADWP facility. Up to 20 workers would be required during project construction and operational activities would be minimal, with LADWP using existing staff for operations and maintenance of the proposed project site. The project would not directly induce population growth as the proposed project would not include the construction of new homes and businesses and would not indirectly support new population or economic expansion. The proposed project would not result in any substantial change to the existing land use pattern or trigger growth in the area. Therefore, no impact would occur.

b) **No Impact.** The proposed project would include the demolition of an existing two-story structure and auxiliary structures, and future use of the project site for open air storage. The project would not involve the demolition or construction of housing. Therefore, the proposed project would not displace people or housing, and no impact would occur.

2.15 Public Services

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
PUBLIC SERVICES —				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:				
i) Fire protection?	☐	☐	☐	☒
ii) Police protection?	☐	☐	☐	☒
iii) Schools?	☐	☐	☐	☒
iv) Parks?	☐	☐	☐	☒
v) Other public facilities?	☐	☐	☐	☒

Discussion

a.i) **No Impact.** The Los Angeles Fire Department (LAFD) provides fire suppression and emergency medical services to the project site and surrounding area. The primary fire station that would service the project site is LAFD Station 66, located approximately 0.8 miles north of the project site at 1909 West Slauson Boulevard (LAFD 2020). Construction activities related to the proposed project would not result in the need for additional fire protective services beyond what is already provided. Once constructed, the project would involve use and maintenance of an open air storage facility, which would be operated approximately three times per week similar to the adjacent wellfield area and by existing LADWP staff. Therefore, there would be no need for new or physically altered fire facilities to serve the proposed project site. No impact would occur.

a.ii) **No Impact.** Police protection services for the project site would be provided by the Los Angeles Police Department. The closest station to the project site is the 77th Street Community Police Station located at 7600 South Broadway, approximately 2.9 miles southeast of the project site (LAPD 2020). Once constructed, the project would involve use and maintenance of an open air storage area, which would be operated approximately three times per week similar to the adjacent wellfield area and by existing LADWP staff. Therefore, there would be no need for new or expanded law enforcement facilities in order to provide adequate police protection services. No impact would occur.

a.iii) **No Impact.** The proposed project would include the demolition of an existing two-story structure and auxiliary structures, and future use of the project site for open air storage. The proposed project would not change existing demand for school services, as the proposed project would not result in an increase in population. No impact would occur.

a.iv) **No Impact.** The proposed project would include the demolition of an existing two-story structure and auxiliary structures, and future use of the project site for open air storage. The proposed project would not result in an increase in population, and would not prompt the need for new parks. No impact would occur.

a.v) **No Impact.** The proposed project would include the demolition of an existing two-story structure and auxiliary structures, and future use of the project site for open air storage. The proposed project would not include new housing or businesses to the area that would require any additional services or public facilities, including libraries. No impact would occur.

References

Los Angeles Fire Department, 2020. Find Your Station Web Tool. Available at: https://www.lafd.org/fire-stations/station-results. Accessed May 19, 2020.

Los Angeles Police Department, 2020. Community Police Station Address Directory. Available at: http://www.lapdonline.org/our_communities/content_basic_view/6279. Accessed May 19, 2020.

2.16 Recreation

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
RECREATION —				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Discussion

a) **No Impact.** The project site does not contain any recreational facilities. The nearest recreational facility is Harvard Park (1535 West 62nd Street, Los Angeles) located approximately 0.3 miles northeast of the project site. The proposed project would not result in direct or indirect growth in population or housing and is not expected to impact existing neighborhood or regional parks or any other recreational facilities due to increases in park usage. No impact would occur.

b) **No Impact.** The project would include the demolition of an existing two-story structure and auxiliary structures, and future use of the project site for open air storage. The proposed project would not include the development of recreational facilities or require the construction or expansion of recreational facilities. No impact would occur.

2.17 Transportation

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
TRANSPORTATION — Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d) Result in inadequate emergency access?	☐	☐	☒	☐

Discussion

a) **Less than Significant Impact.** The proposed project would include the demolition of an existing two-story structure and auxiliary structures, and future use of the project site for open air storage. Regional access to the proposed project is provided by I-110 approximately 1.7 miles to the east. Local access to the project site would occur from Slauson Avenue and Gage Avenue, which intersect with St. Andrews Place. Project construction is anticipated to take approximately 2.5 months. Construction would occur fully within the project site and would not encroach into the public right-of-way. Export of demolition debris would be required and would be hauled from the project site and transported along existing roads/highways surrounding the project site. Materials would be delivered to nearby recycling and landfill facilities as described in Section 1.5, *Project Construction*. Construction equipment, including a flatbed truck, a light pickup truck, a truck-mounted earth auger, two heavy-duty trucks, two dump trucks, a crawler loader, an air compressor, two pavement breakers, an air hose, and a two-drum roller would be transported to the project site at the beginning of project construction and would be removed once project construction is completed. It is estimated that a maximum of 25 truck haul trips per day would be required to remove demolition debris from the project site during peak construction activity. The peak period of construction would last approximately 3 weeks, when the proposed project would remove walls and foundation materials from the existing two-story structure. Daily trips to and from the project site would consist of workers in pickup trucks accessing the site. Worker trips are estimated to peak at 20 round-trips per day. Since the proposed project is in a highly urbanized area and peak trips to and from the project site would be minor relative to existing traffic conditions in the City of Los Angeles, the proposed project would not conflict with any program plans, or any ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Impacts would be considered less than significant.

Once operational, existing staff would periodically maintain and access the project site similar to existing conditions at the adjacent LADWP property. It is estimated that

approximately three trips per week would enter/exit the storage area once construction is complete. Therefore, the proposed project would not increase transit in the area surrounding the project site. No impact would occur.

b) **Less than Significant Impact.** In accordance with Senate Bill (SB) 743, the new CEQA Guidelines Section 15064.3, subdivision (b) was adopted in December 2018 by the California Natural Resources Agency. These revisions to the CEQA Guidelines criteria for determining the significance of transportation impacts are primarily focused on projects within transit priority areas and shift the focus from driver delay to reduction of GHG emissions, creation of multimodal networks, and promotion of a mix of land uses. Vehicle miles traveled (VMT) is a measure of the total number of miles driven to or from a development and is sometimes expressed as an average per trip or per person. The newly adopted guidance provides that a lead agency may elect to be governed by the provisions of this section immediately. On July 30, 2019, the Los Angeles City Council adopted VMT as part of its CEQA Transportation Thresholds as a criterion to determine transportation impacts, pursuant to SB 743 and the recent changes to CEQA Guidelines Section 15064.3.[5] The City's required methodology for VMT analysis is documented in the LADOT's Transportation Assessment Guidelines (TAG) (LADOT 2019). The TAG indicates that a project's VMT impact would be less than significant if the project would generate fewer than 250 daily vehicle trips. As documented above in Section 2.17 (a), construction of the proposed project would generate a maximum of 25 haul truck trips per day, and 20 worker trips per day. Since construction of the proposed project would generate less than 250 daily vehicle trips, and operation of the proposed project would be similar to existing conditions at the adjacent LADWP property (i.e., no new operational vehicle trips), it can be assumed that the proposed project would result in a less than significant impact with respect to VMT.

c) **No Impact.** The proposed project would include the demolition of an existing two-story structure and auxiliary structures, and future use of the project site for open air storage. The proposed project would not include any new geometric design features that could be considered dangerous or increase hazard in the project site. No impact would occur.

d) **Less than Significant Impact.** Construction activities for the proposed project would take place mainly within the 6236 S. St. Andrews Place property. Construction staging areas, and equipment and vehicle laydown areas would be accommodated within the project site's paved parking area and within the adjacent LADWP property, if needed. No road closures are required. Emergency access would be maintained at all times in the area surrounding the project site. In addition, LADWP would coordinate with City staff and would provide an anticipated schedule of activities outlining approximate daily active construction dates and times. Impacts would be considered less than significant.

5 City of Los Angeles, City of Los Angeles Adoption of Vehicle Miles Traveled as the Transportation Impact Metric under the California Environmental Quality Act, August 9, 2019.

References

LADOT, 2019. City of Los Angeles California Environmental Quality Act (CEQA) Transportation Thresholds. Available at: https://planning.lacity.org/odocument/5d17e8b1-7645-4a9b-b994-689baaf5701d/Transportation_FAQ.pdf. Accessed June 26, 2020.

2.18 Tribal Cultural Resources

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
TRIBAL CULTURAL RESOURCES —				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources. Code Section 5020.1(k), or	☐	☐	☐	☒
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☐	☒

Discussion

California Assembly Bill (AB) 52, through its implementing regulations, requires that lead agencies consult with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed project and who have requested in writing to be informed by the lead agency of proposed projects in the tribe's geographic area (PRC Section 21080.3.1[b] and [d]).

A Sacred Lands File search conducted by the NAHC on May 8, 2020, indicates that Native American cultural resources are not known to be located within the project site.

On May 26, 2020, LADWP sent notification of the proposed project to California Native American tribal representatives traditionally or culturally affiliated with the geographic area. The letter notified the tribes of the proposed project, provided a description of the project and location information, assured the Tribe of LADWP's commitment to confidentiality under PRC Section 21082.3(c), LADWP's contact information, and invited the tribes to respond within 30 days with their interest in AB 52 consultation. On June 8, 2020, Andrew Salas, Chairman of the Gabrieleño Band of Mission Indians – Kizh Nation responded to LADWP's formal notification and requested consultation. A consultation meeting was subsequently held on August 27, 2020, with Chairman Salas and Matthew Teutimez of the Kizh Nation.

On September 10, 2020, Chairman Salas provided via email documentation to LADWP, including historic maps, excerpts about potential locations of villages, and other relevant ethnographic literature. The documentation indicated trade routes, trails, waterways, and the village of *Tajauta* were historically located in the region around the project site. Chairman Salas

stated that historic railroad right-of-ways typically followed traditional Gabrieleño trade routes and the railroad corridors represent geographically defined locations of Gabrieleño trade routes. Based on the maps provided by Chairman Salas, a railroad corridor, representing a traditional trade route, is depicted approximately 0.25 miles northwest of the project site.

Chairman Salas also stated that waterways in the vicinity of the project area, as depicted by historic maps provided by Chairman Salas, were used by the Gabrieleño for subsistence purposes and provided a setting for seasonal and permanent settlements, trade depots, ceremonial and religious prayer sites, and burials and cremation sites. The maps provided by Chairman Salas indicate waterways were historically located from 2.5 to 3 miles north and west of the project site, respectively.

Chairman Salas stated the historic location of the village of *Tajauta* overlaps the project site and provided relevant literature which describes the location of *Tajauta*. The literature provided was an excerpt from McCawley (1996), which described *Tajauta* as a Gabrieleño placename associated with what is presently the Watts area, approximately 5 miles southeast of the project site.

As a result of the consultation, no tribal cultural resources were identified within the project site. However, based on the materials provided by Chairman Salas, the Kizh Nation considers the project site sensitive for the presence of subsurface deposits potentially containing cultural items and human remains. Language provided by Chairman Salas also described several traditional and protective procedures to be implemented in the event that Native American human remains are encountered.

a.i) **No Impact.** No tribal cultural resources were identified as a result of the consultation with the Gabrieleño Band of Mission Indians – Kizh Nation. Therefore, no tribal cultural resources that are listed in or eligible for listing in the California Register, or in a local register of historical resources as defined in PRC Section 5020.1(k) would be impacted by project implementation. No impact would occur.

Although no tribal cultural resources were identified as a result of the consultation, Chairman Salas of the Kizh Nation considers the project site to be sensitive for the presence of subsurface cultural items and human remains. As such, **Mitigation Measures CUL-3**, **CUL-4**, and **CUL-5**, which include archaeological and Native American monitoring and inadvertent discovery protocols for archaeological resource and human remains, would be implemented.

a.ii) **No Impact**. As noted above under Section 2.18 (a.i), no tribal cultural resources were identified as a result of the consultation with the Gabrieleño Band of Mission Indians – Kizh Nation. Therefore, no tribal cultural resources that have been determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1, would be impacted by program implementation. No impact would occur.

Although no tribal cultural resources were identified as a result of the consultation, Chairman Salas of the Kizh Nation considers the project site to be sensitive for the presence of subsurface deposits potentially containing cultural items and human remains. As such, **Mitigation Measures CUL-3**, **CUL-4**, and **CUL-5**, which include archaeological and Native American monitoring and inadvertent discovery protocols for archaeological resources and human remains, would be implemented.

References

McCawley, William. 1996. *The First Angelinos: The Gabrielino Indians of Los Angeles*, Malki Museum Press, Banning, California.

2.19 Utilities and Service Systems

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
UTILITIES AND SERVICE SYSTEMS — Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	☒
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Discussion

a) **No Impact.** The proposed project would include the demolition of an existing two-story structure and auxiliary structures, and future use of the project site for open air storage. Upon demolition of the existing structures, utilizes would be capped and left in place. Operation of the proposed project would include storage of materials and crane usage to move materials around within the parcel. The proposed project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electrical power, natural gas, or telecommunications facilities. No impact would occur.

b) **Less than Significant Impact.** Construction of the project would require some water for dust control, which would be provided by imported water trucks. Wastewater generated during construction of the proposed project would be minimal, consisting of portable toilet waste generated by construction workers. Wastewater generated during construction would be collected within portable toilet facilities. All wastewater generated in portable toilets would be collected by a permitted portable toilet waste hauler and appropriately disposed of at an identified liquid-disposal station. Therefore, construction or expansion of water or wastewater facilities would not be required for construction of the proposed project.

Operation of the project would be minimal, requiring three worker trips per week and 3 hours of forklift usage per week at the project site, and would not require or result in the

construction of new or expanded water facilities. Therefore, impacts would be less than significant.

c) **Less than Significant Impact.** As described above within Section 2.19 (b), wastewater generated during construction of the proposed project would be minimal, and would be collected by a permitted portable toilet waste hauler and appropriately disposed of at an identified liquid-disposal station. Upon completion of construction activities, the proposed project would be used as an open air storage area. Therefore, impacts related to the wastewater treatment provider having adequate capacity to serve the project's needs would be considered less than significant.

d) **Less than Significant Impact.** The project anticipates that an excess of 1,280 CY of concrete, 1,670 CY of Unreinforced Masonry, and 1,300 CY of wood would be hauled off-site for disposal. Demolition debris and excavation material is assumed to be sent to one of two recycling facilities: 25th Street Recycling (2121 East 25th Street, Los Angeles, CA) or California Waste Services (621 West 152nd Street, Gardena, CA). Any non-recyclable solid waste would be serviced by Scholl Canyon Landfill, which has a remaining capacity of 9.9 million CY and a maximum daily capacity of 3,400 tons per day, and is estimated to be in operation through April 2030 (CalRecycle 2011). As the majority of waste generated by the proposed project would occur during construction, and because the proposed project would divert debris generated during construction to recycling facilities, the amount of waste generated at the project site is not anticipated to significantly impact nearby landfill serving capacities. No impact would occur.

e) **Less than Significant Impact**. As described in Section 2.19 (d), the project would be served by recycling facilities that would be capable of accommodating solid waste generated at the project site. During construction, solid waste would be taken to nearby recycling facilities. Upon completion of construction, the project site would be used as an open air storage area and would not generate or required the disposal of solid waste. The proposed project would continue to comply with federal, state, and local regulations related to solid waste. Impacts would be less than significant.

References

CalRecycle, 2011. Solid Waste Facility Permit No. 19-AA-0012. Available at: file:///C:/Users/acardoza/Downloads/Scholl%20Canyon%20Permit.pdf. Accessed May 22, 2020.

2.20 Wildfire

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
WILDFIRE — If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Discussion

a-d) **No Impact**. The project site is located in a highly urbanized area. The proposed project is not included within or near an area designated as a State Responsibility Area and is not located in an area classified as a Very High Fire Hazard Severity Zone according to maps prepared by CAL FIRE (CAL FIRE 2007; CAL FIRE 2011). In addition, the City of Los Angeles Safety Element's Selected Wildfire Hazard Areas in the City of Los Angeles map indicates that the project site is not located in the Mountain Fire District or within a fire buffer zone (City of Los Angeles 1996). Therefore, since the project site is not located in or near a state responsibility area or lands classified as very high fire hazard severity zones, no impacts related to wildlife would occur.

References

California Department of Forestry and Fire Protection (CAL FIRE), 2007. Fire Hazard Severity Zones in State Responsibility Areas Map. Available at: https://osfm.fire.ca.gov/media/6636/fhszs_map.pdf. Accessed April 20, 2020.

CAL FIRE, 2011. Los Angeles Very High Fire Hazard Severity Zones in LRA Map. Available at: https://osfm.fire.ca.gov/media/5830/los_angeles.pdf. Accessed April 20, 2020.

City of Los Angeles, 1996. City of Los Angeles General Plan, Safety Element. Available at: https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf. Accessed May 19, 2020.

2.21 Mandatory Findings of Significance

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
MANDATORY FINDINGS OF SIGNIFICANCE —				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Discussion

a) **Less than Significant Impact with Mitigation.** As discussed in Section 2.4, *Biological Resources,* the project site is located within a highly urbanized area and the site is currently developed with a two-story building and a parking area. The project site does not contain any vegetation and the project would not result in any impacts to fish or wildlife species. No impacts to biological resources would occur and no mitigation is required.

As described in Section 2.5, *Cultural Resources*, one historic-period built resource, the Bauman Brothers industrial complex, was identified within the project site. However, an evaluation of the industrial complex for inclusion in the National Register, California Register, and local listing that was conducted for the proposed project determined that the Bauman Brothers industrial complex does not qualify as a historical resource and its demolition would not constitute a significant impact. No known archaeological deposits that qualify as a historic resource, paleontological resources, and/or or unique geologic features were identified within the project site. Nevertheless, proposed ground disturbance has the potential to encounter archaeological and/or paleontological resources, or human remains. Implementation of **Mitigation Measures CUL-1 through CUL-5, GEO-1,** and **GEO-2** would reduce any potential impacts to less than significant.

Mitigation Measures

Implement **Mitigation Measures CUL-1 through CUL-5, GEO-1,** and **GEO-2**.

b) **Less than Significant Impact with Mitigation.** A cumulative impact could occur if the project would result in an incrementally considerable contribution to a significant cumulative impact in consideration of past, present, and reasonably foreseeable future projects for each resource area. No direct significant impacts were identified for the proposed project that could not be mitigated to a less than significant level. However, when combined with other projects within the vicinity, the project may result in a contribution to a potentially significant cumulative impact.

The proposed project would have no impact on agricultural resources, biological resources, land use and planning, mineral resources, population and housing, public services, recreation, tribal cultural resources, and wildfire. In addition, the project would have less than significant impacts to aesthetics, air quality, energy, GHG emissions, hazards and hazardous materials, hydrology and water quality, transportation, and utilities and service systems. As a result, impacts would not be considered cumulatively considerable.

Cultural resources, geology and soils, and noise impacts that are generated during construction activities would be short-term and limited by the overall short construction period of 4.5 months. Further, impacts related to these resources would be less than less than significant with implementation of mitigation measures. Therefore, the proposed project impacts would not be considered cumulatively considerable.

Mitigation Measures

Implement **Mitigation Measures CUL-1 through CUL-4, GEO-1, GEO-2**, and **NOI-1 through NOI-4**.

c) **Less than Significant Impact with Mitigation.** As discussed in Section 2.13, *Noise*, the proposed project has the potential to increase noise levels to surrounding residents to a significant level during construction. However, construction activities would be temporary impacts occurring only during the 4.5-month construction period. In addition, **Mitigation Measures NOI-1 through NOI-4** would be implemented to reduce these impacts to less than significant. Therefore, the proposed project would not result in substantial adverse effects on human beings, either indirectly or directly.

Mitigation Measures

Implement **Mitigation Measures NOI-1 through NOI-4**.