DRAFT

Initial Study/
Mitigated Negative Declaration

Hoover Street District Yard Demolition and New Power District Yard Project

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

July 2021

CEQA DRAFT Initial Study and Mitigated Negative Declaration

Hoover Street District Yard Demolition and New Power District Yard Project

July 2021

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1.1 Introduction

Los Angeles Department of Water and Power (LADWP) is proposing the Hoover Street District Yard Demolition and New Power District Yard Project (proposed project) at 611 North Hoover Street in Los Angeles California. The proposed project would demolish the East Hollywood Streetlight Facility, which includes aging infrastructure on site, and construct a new maintenance yard for transmission line maintenance activities. The new facility would include a District Office building, Supply Chain Services (SCS) Warehouse, and Fleet Maintenance facility for a total of 99,043 square feet (sf). The proposed project would also provide 10,350 sf of outdoor storage facilities and a fueling station. The fueling station would provide unleaded and diesel fueling services. The proposed project would provide 157 subterranean parking spaces and 23 surface-level parking spaces that would all be equipped with EV chargers. The proposed project's facilities are designed to be all-electric in compliance with the City of Los Angeles' Major Garcetti's February 2020 commitment for City-owned buildings to be 100 percent carbon free. Additionally, all proposed project facilities would comply with the Jun 2009 Los Angeles Existing Buildings Energy and Water Efficiency Program Ordinance.

1.2 Project Location

As shown in **Figure 1, Regional and Project Location**, the project site is located northwest of downtown Los Angeles at 611 North Hoover Street, in the City of Los Angeles. The project site is bound by Clinton Street to the south, Commonwealth Avenue to the west, residential uses to the north, and North Hoover Street to the east. The site is comprised of two parcels (Assessor Parcel Numbers 5539027900 and 5539027901) that are currently developed with a LADWP street light maintenance yard, including several buildings and a surface-level parking lot. Regional access to the project site is provided by U.S. Highway 101 (US-101), approximately 0.25 miles south, and local access is provided by Vermont Avenue and Melrose Avenue.

1.3 Existing Site Conditions and Surrounding Uses

The East Hollywood Streetlight Facility was constructed in 1926 and operated until recently as street light maintenance facilities. As shown in **Figure 2, Existing Conditions**, the eastern portion of the project site is currently occupied by structures, including a 19,800 sf warehouse and covered parking, 3,396 sf office and tool room, a 2,060 sf facility for fleet maintenance, 8,172 sf street light facility, 2,315 sf truck shed, and a 1,405 sf open truck shed. The western portion of the site is a surface-level parking lot. There is an existing LADWP Distributing Station

No. 15 on the southeast corner of Clinton Street and Commonwealth Avenue; however, this structure is not a part of the project and is outside the project site boundaries.

Historic soil and groundwater contamination has occurred on and directly adjacent to the project site. During an underground storage tank (UST) removal conducted at the site in 1990, total petroleum hydrocarbons such as gasoline (TPHg) and benzene, toluene, ethylbenzene, and xylenes (BTEX) were detected in soil and groundwater. During subsequent groundwater monitoring, chlorinated volatile organic compounds (VOCs), including tetrachloroethene (PCE) and trichloroethene (TCE), were also detected in groundwater. An upgradient dry-cleaning facility has been identified as a source of VOCs in groundwater beneath the site. Dry cleaners used PCE as the dry cleaning solvent. When spilled into groundwater, the PCE degrades to TCE and less chlorinated VOCs over time. The project site currently has 15 onsite monitoring wells associated with ongoing monitoring and cleanup of groundwater contamination. As a result of this previous contamination, the project site is listed on the State Water Resources Control Board (SWRCB) GeoTracker website as the LADWP Streetlight Maintenance Headquarters with the following three listings: (1) an active underground storage tank permit; (2) a cancelled Waste Discharge Requirements permit for a previous groundwater treatment injection event; and (3) a completed leaking underground storage tank (LUST) cleanup action closed in 1998.

Surrounding uses primarily include single and multi-family residential to the north along Melrose Avenue, east along Commonwealth Avenue, and south along Clinton Street. To the east, along North Hoover Street, there are a mix of commercial and residential uses, including a restaurant, small retail stores, and single-family residential. The Bellevue Recreation Center is located approximately 0.15 mile to the northeast or the project site and the Los Angeles City College is located approximately 0.5 mile to the northwest. The site is accessed through local streets, including Melrose Avenue to the north, North Hoover Street to the east, Clinton Street to the south, and North Commonwealth to the west.

1.4 Project Overview

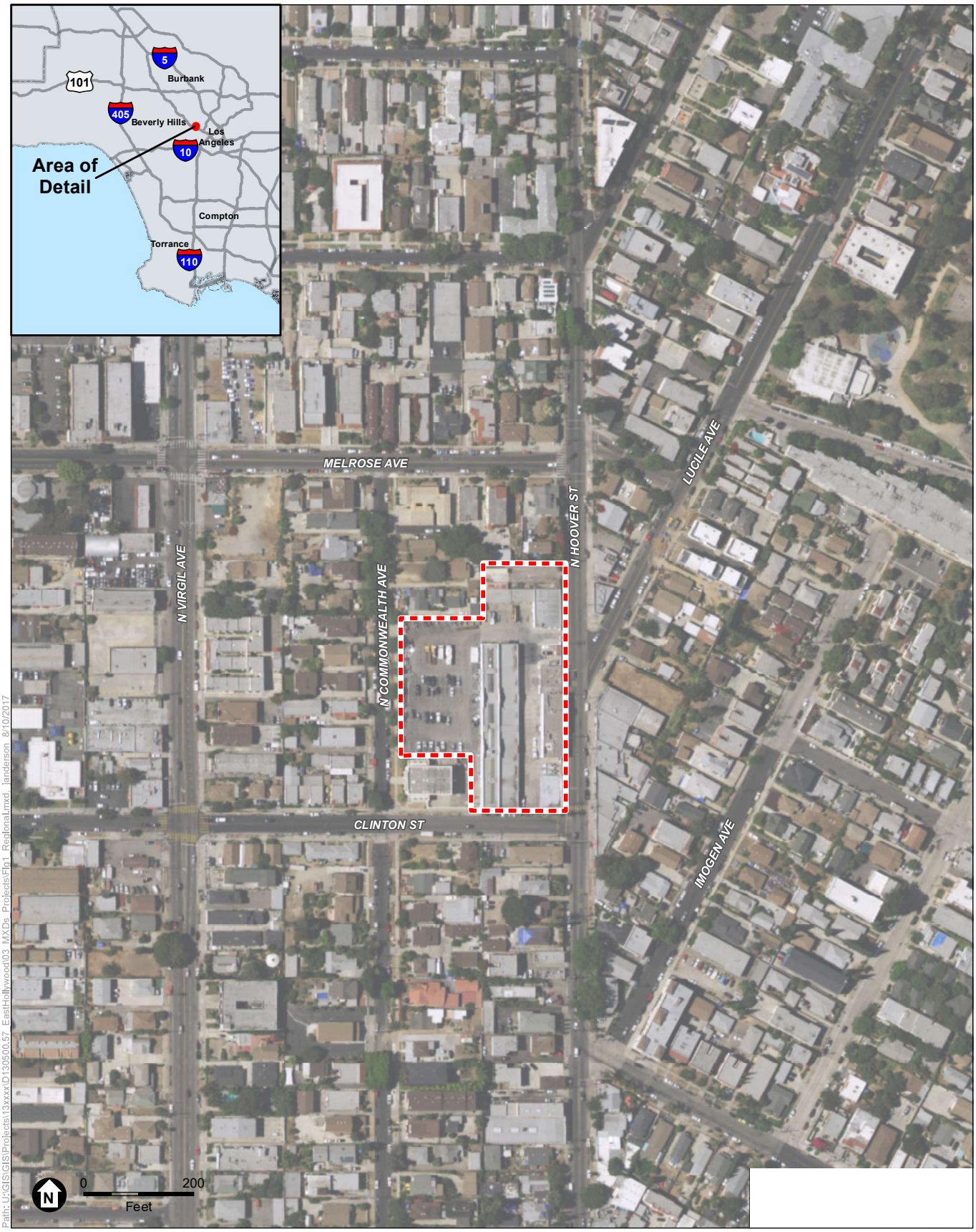
The proposed project would construct a new Power District Yard at the site, as shown in **Figure 3, Proposed Site Layout**. The project consists of construction and operation of a District Office building, SCS warehouse, and Fleet Maintenance facility, which would be located on the Corner of Hoover Street and Clinton Street and would be three stories high (approximately 65 feet). **Figure 4, Proposed Site Schematic,** provides a schematic site plan and conceptualization of the proposed project components, while **Figure 5a, Landscape and Planting Plans,** and **Figure 5a, Planting Plan – Level 3,** provides landscape concepts at the project site. An aboveground equipment fueling pad would also be constructed, which would involve the installation of two gasoline and one diesel above ground storage tanks at the fueling pad. The proposed project also includes three sections of landscaping (entry landscape, public right of way streetscape, employee plaza landscape, and living roof landscape) totaling 4,680 sf. The proposed landscape areas include approximately 3,200 sf on the rooftop deck of the building and 1,480 sf along the first level patio of the building. Furthermore, the proposed project would replace the seven palm trees along Clinton Street with seven shade trees and would add eight new shade trees along North Hoover Street. The proposed project would remove the two existing site entrances

along North Hoover and replace them with an entrance and exit driveway for fleet vehicle use. In addition, an entrance and exit driveway to the subterranean garage, where personal staff vehicles and smaller fleet trucks would be stored, would be provided along Clinton Street. Emergency access to the site would be provided via Commonwealth Avenue. The proposed project aims to achieve a Leadership in Energy and Environmental Design (LEED) Gold rating, and will incorporate at least one sub-criteria from each major section on the LEED Project Checklist. To reach these objectives, the proposed project would install solar panels on the roofs of the three-story District Office building, the fueling pad, and the fleet parking area, as shown in **Figure 4, Proposed Site Schematic**. **Table 1, Proposed Uses**, describes the individual project components in more detail.

TABLE 1
PROPOSED USES

Project Components		Size	Height (feet)
Building Uses			
First Floor			
District Office		13,335 sf	
Warehouse		10,703 sf	
Fleet Shop		7,892 sf	
Solar Array/Parking		24,483 sf	
Second Floor (Office)		13,946 sf	
Third Floor (Office)		28,684 sf	
	Total	**99,043 sf**	65[a] feet
Parking			
Subterranean Lot		157 spaces	N/A
Surface-Level Lot		23 spaces	N/A
	Total spaces	**180 spaces**	
Outdoor Storage			
Outdoor Storage Area		10,350 sf	N/A
	Total sf	10,350 sf	

[a] Total height includes height of solar panels placed on the building's roof.
SOURCE: LADWP, 2019.



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SOURCE: ESRI

Hoover Street District Yard Demolition and New Power District Yard Project

Figure 1
Regional and Project Location

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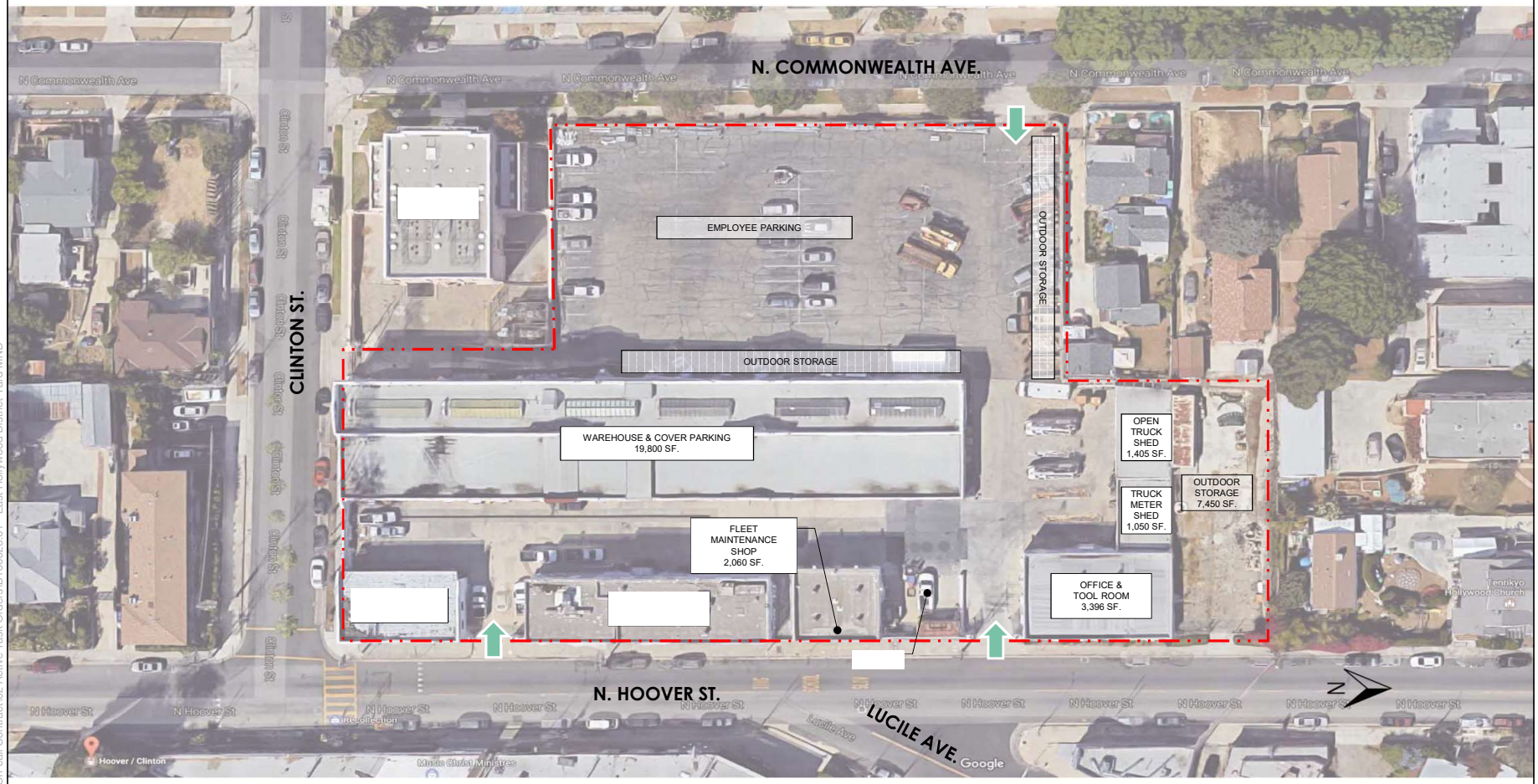

SOURCE: East Hollywood District Yard Schematic Master Plan, 2017

Hoover Street District Yard Demolition and New Power District Yard Project

Figure 2
Existing Conditions

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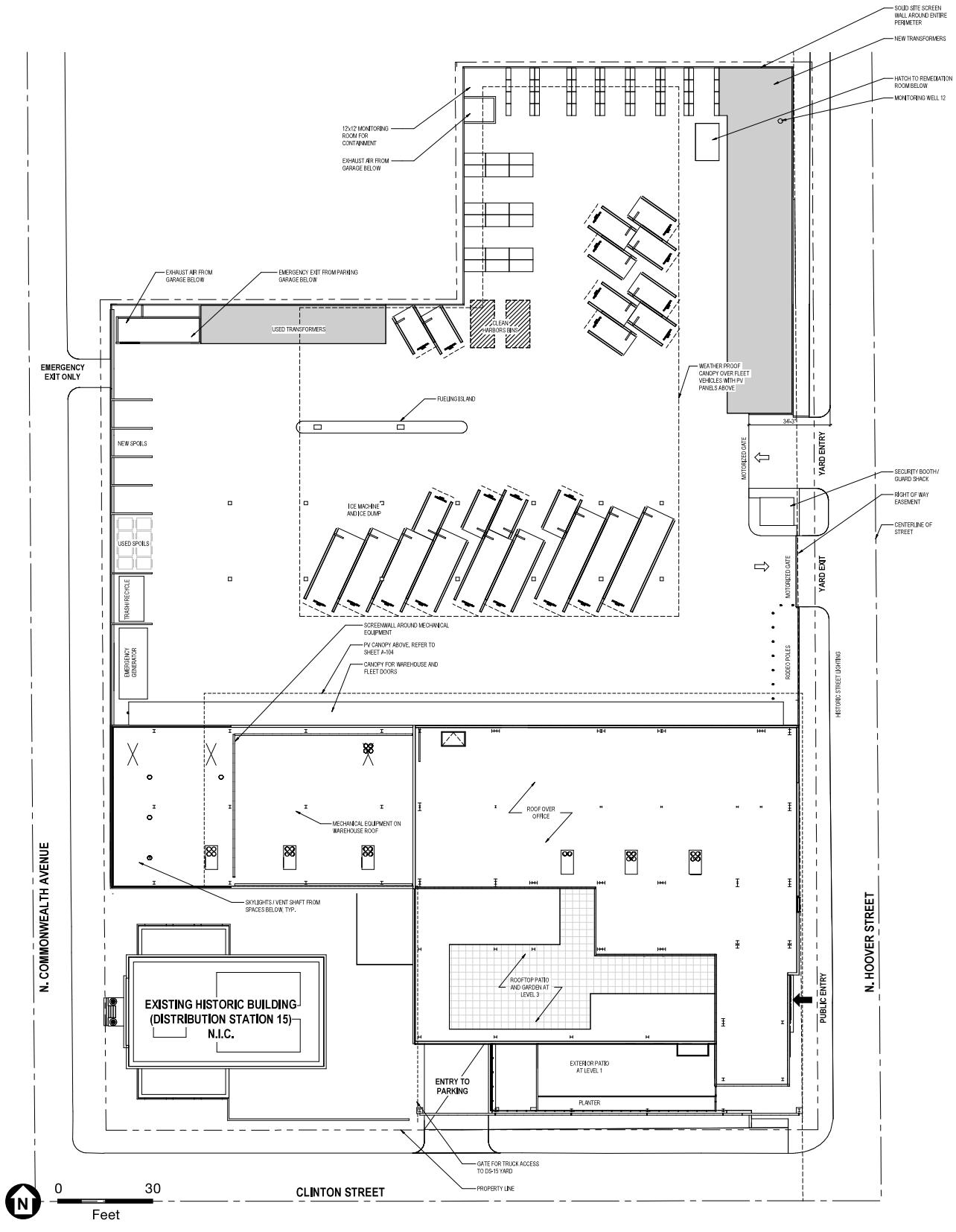

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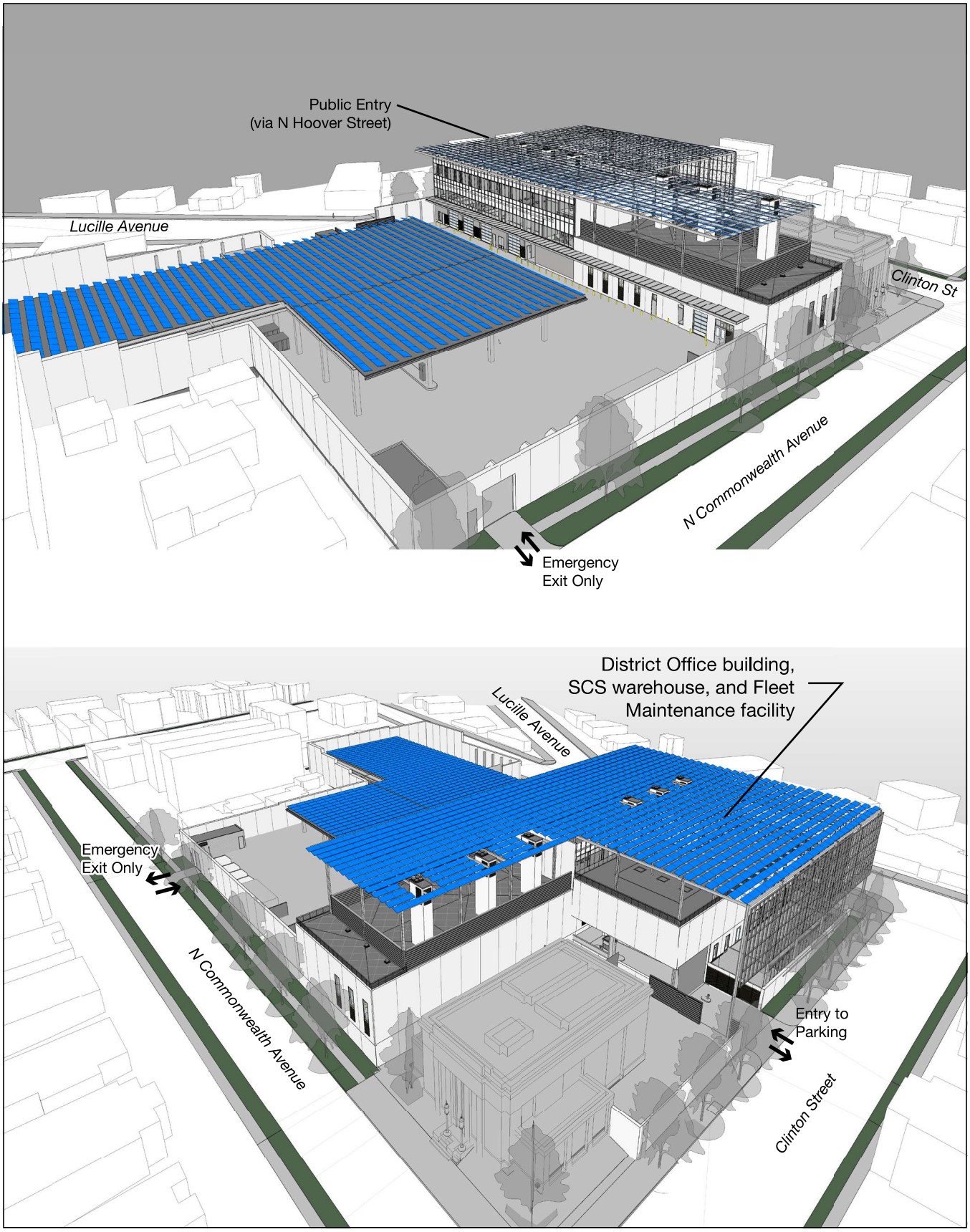
SOURCE: East Hollywood District Yard Schematic Master Plan, 2019

Hoover Street District Yard Demolition and New Power District Yard Project

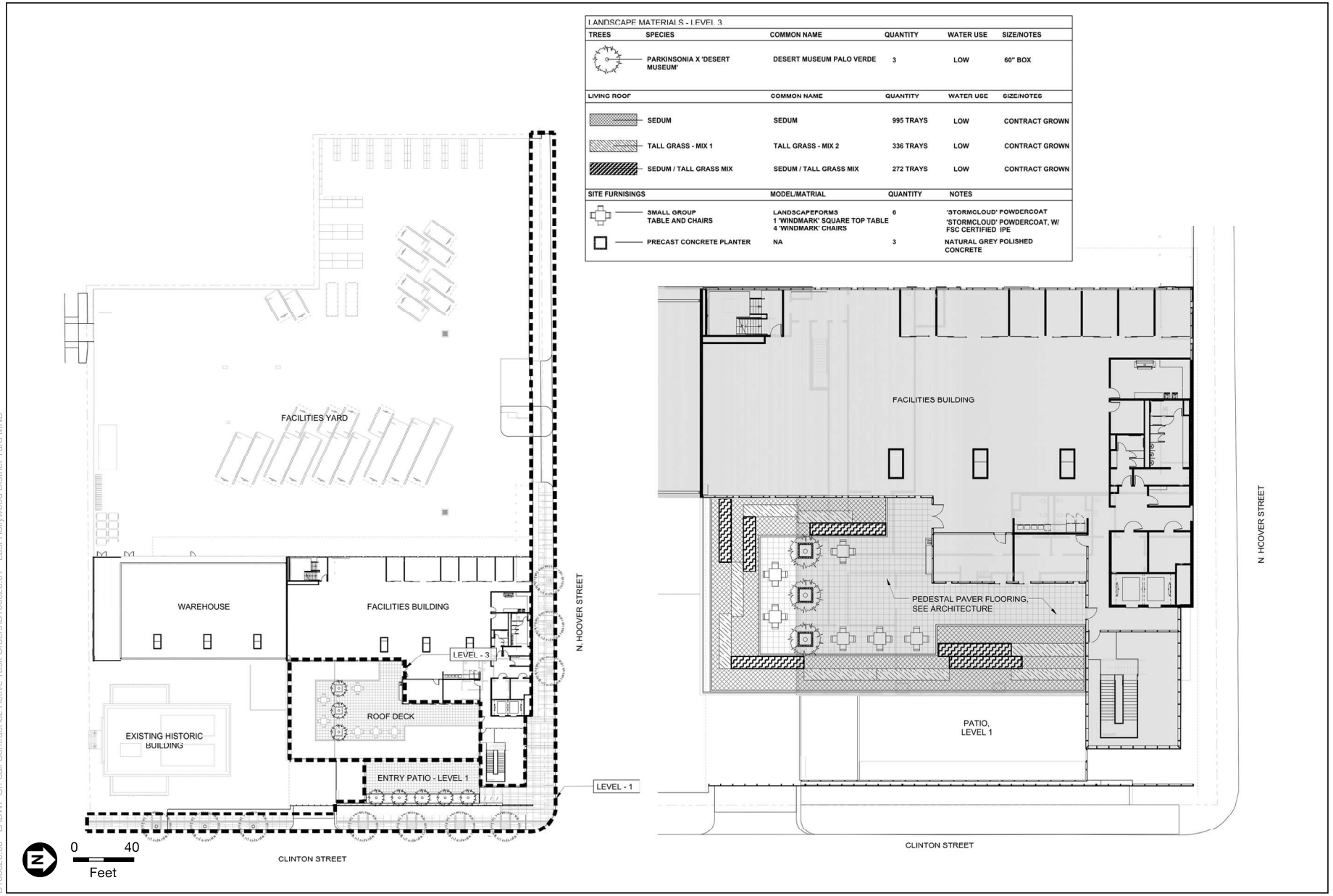
Figure 3
Proposed Site Layout



SOURCE: East Hollywood District Yard Schematic Master Plan, 2019

Hoover Street District Yard Demolition and New Power District Yard Project

Figure 4
Proposed Site Schematic



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SOURCE: Los Angeles Department of Water and Power, 2019

Hoover Street District Yard Demolition and New Power District Yard Project

Figure 5a
Landscape and Planting Plans

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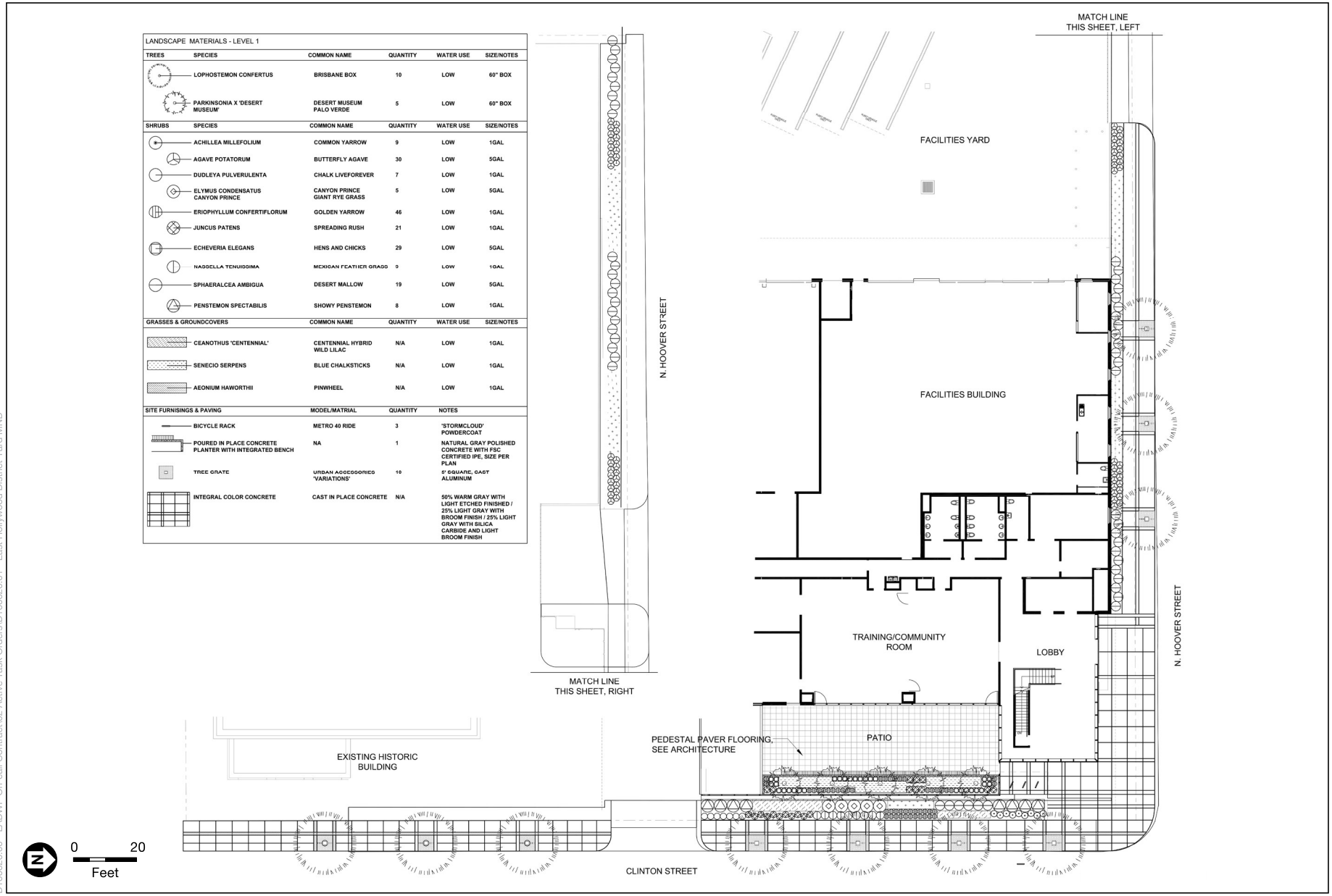

SOURCE: Los Angeles Department of Water and Power, 2019

Hoover Street District Yard Demolition and New Power District Yard Project

Figure 5b
Planting Plan - Level 3

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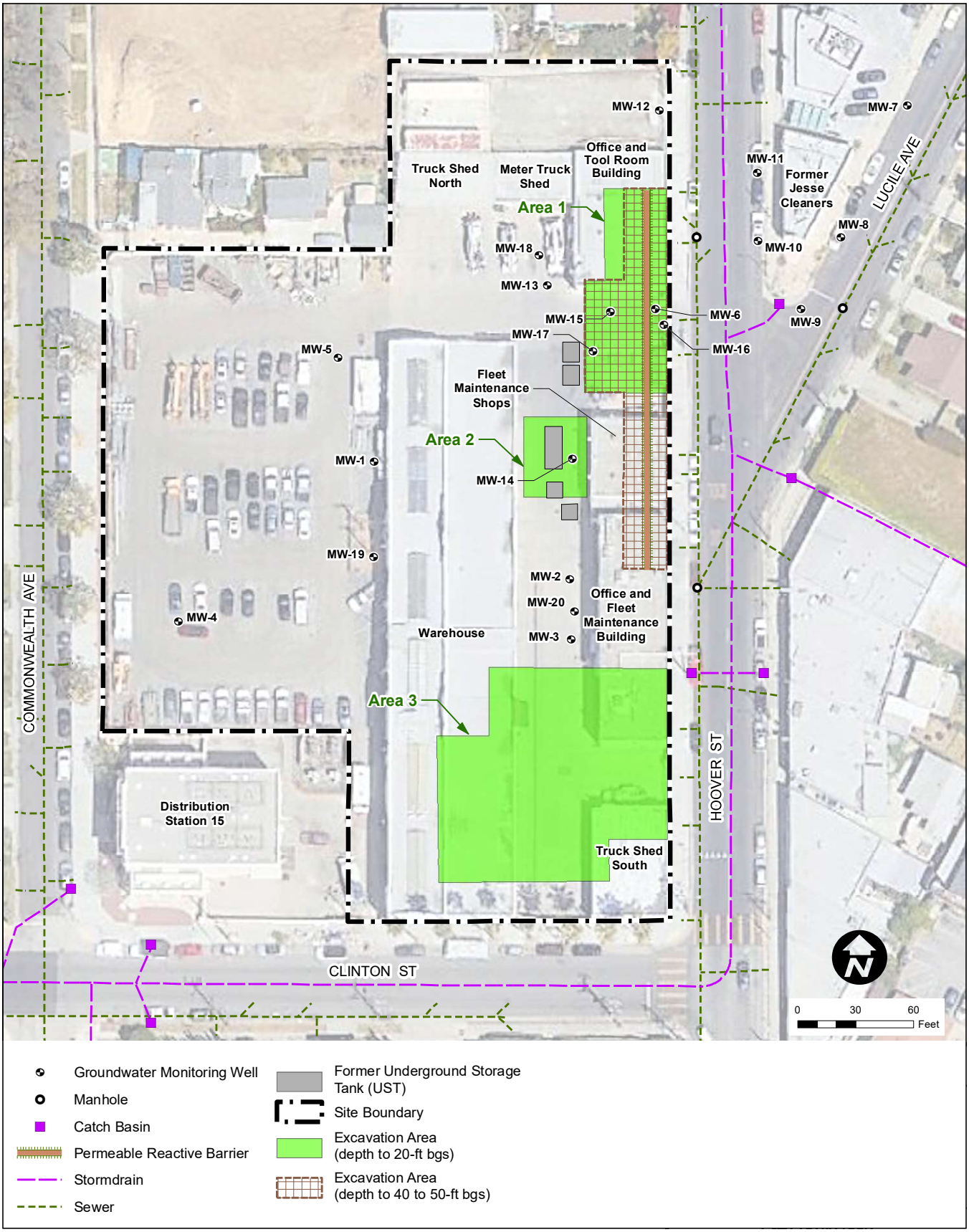
As explained above, petroleum by products from onsite operations and dry cleaning solvents from a former dry cleaning facility located just northeast of the project site have contaminated soil and groundwater at concentrations above regulatory action levels. Given the onsite soil and groundwater contamination, the proposed project would include remediation of contaminated soil and groundwater according to the preferred remediation plan summarized further below and detailed in the Draft Remedial Action Plan (RAP) provided in **Appendix C**. It should be noted that the Draft RAP is pending approval from the Los Angeles Regional Water Quality Control Board (RWQCB). This IS/MND assumes that the preferred remediation plan will be Alternative 3, the preferred alternative proposed in the RAP. Under Alternative 3, soil remediation would occur through excavation and off-site disposal of contaminated soil (see **Figure 6**, **Proposed Soil Excavation, Vapor Barrier and Permeable Reactive Barrier**). The Draft RAP was prepared and Alternative 3 was selected with the assumption that redevelopment at the project site would occur prior to the contamination source clean up. If the redevelopment schedule should change or be modified, or if the contamination source clean up occurs prior to redevelopment, elements of the selected remedy may not be necessary. As proposed in the Draft RAP, groundwater remediation would occur with constructing a subsurface PRB along the east side of the property along Hoover Street. The PRB would treat the contaminated groundwater from the off-site source, as it flows through the PRB. As part of the excavation process, dewatering is required if groundwater is encountered. The process of removing encountered groundwater as part of the dewatering process would also likely result in the removal of some contaminated groundwater at the site (see **Figure 6**, **Proposed Soil Excavation, Vapor Barrier and Permeable Reactive Barrier).**

The combination of the demolition of the existing site structures, remediation of the contaminated soil and groundwater, and construction and operation of the new maintenance facility would be coordinated and integrated because the new maintenance facility and the remediation actions have overlapping footprints. The current understanding of the sequence of construction events is listed below:

1. **Implement Data Gap Workplan (included as Appendix A in the Draft RAP in Appendix C of this IS/MND)** – The purpose of this action is to confirm the soil excavation depths and inform the final design of the PRB groundwater treatment system through the collection of additional soil and groundwater data, and bench testing of treating contaminated groundwater through PRB treatment materials.
2. **Demolition of existing surface structures** – This step would remove all existing aboveground site structures.
3. **Excavation and soil remediation** – This step would excavate and remove contaminated soil and dewater the excavations to enable construction of both the subsurface parking structures and the construction of the subsurface PRB, which would be adjacent and west of the subsurface parking structure.
4. **Construction of subterranean parking structure, vapor barrier, and PRB groundwater treatment system** – This step would construct the subterranean parking structure and PRB groundwater treatment system, other than the installation of subsurface utilities for the proposed project (included in the next step). Excavation, shoring, and dewatering would be included in this process.



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SOURCE: Tetra Tech, 2021

Hoover Street District Yard Demolition and New Power District Yard Project

Figure 6
Proposed Soil Excavation, Vapor Barrier and Permeable Reactive Barrier

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5. **Construction of surface structures and utilities** – This step would construct the surface structures and utilities for the proposed project over the subterranean parking structure and the subsurface PRB groundwater treatment system.
6. **Installation of monitoring wells** – This step would install monitoring wells to monitor the progress of treating groundwater through the PRB groundwater treatment system. This would be done after the proposed project and pavement has been finished, so that the well heads can be flush with the pavement.
7. **Operation and maintenance** – This step would include the operation and maintenance of both the proposed project and the subsurface groundwater remediation system, in compliance with the institutional controls set by the RWQCB.

Project Construction

The following summarizes the above-listed construction activities.

Implement Data Gap Work Plan

The Data Gap Work Plan is included as Appendix A in the Draft RAP in Appendix C of this IS/MND. To complete the design of the groundwater treatment system, additional data is required to inform the final remedial design. The data gaps activities are anticipated to require 5 to 6 months to complete and are anticipated to start in the fall of 2021. The remaining investigation tasks are listed below.

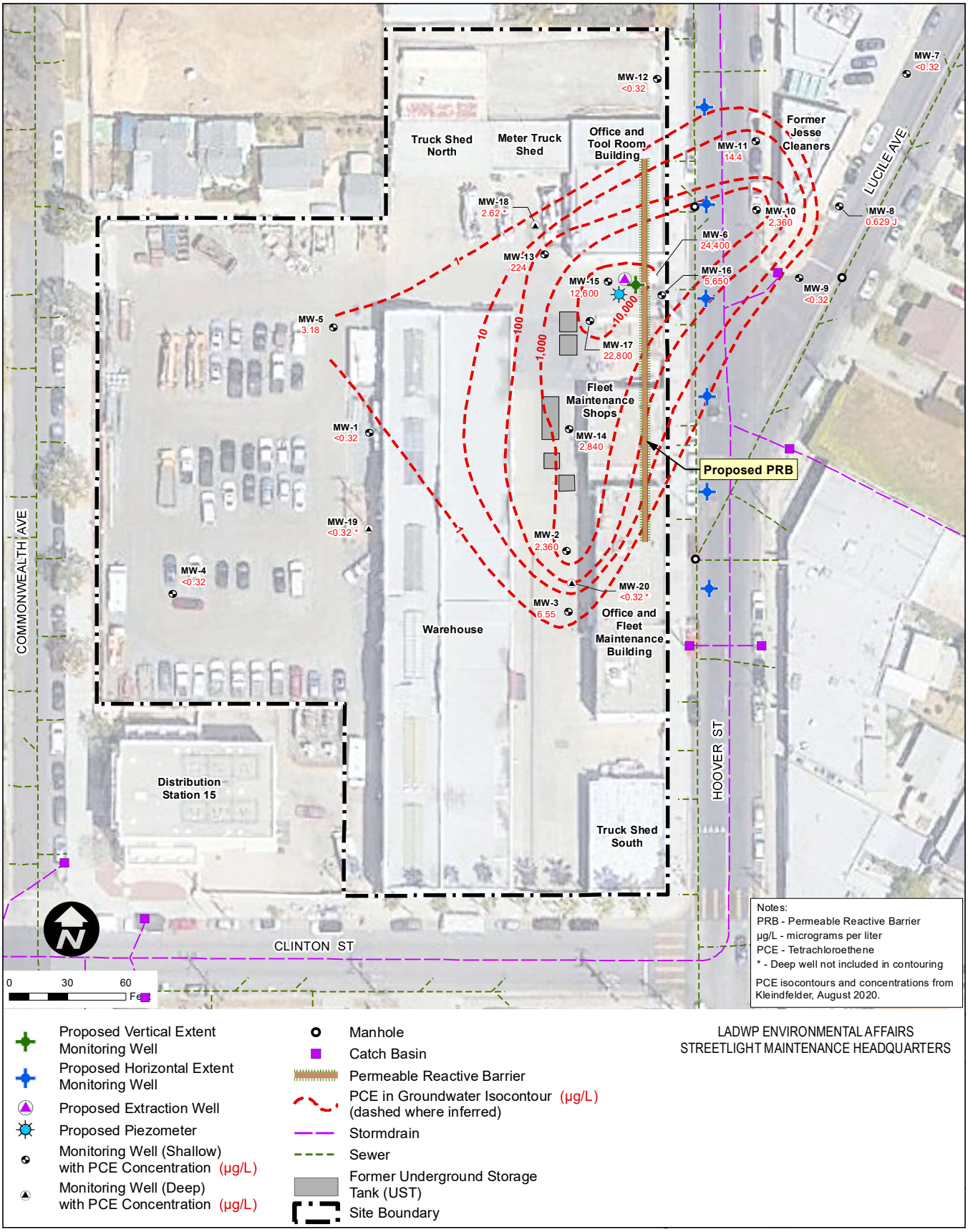
Vertical Profile Groundwater Sampling - This element involves installation of one monitoring well (with five short screen intervals) to evaluate the vertical extent of groundwater contamination (see **Figure 7, Proposed Data Gap Work Plan Activities**). The groundwater data would be used to evaluate the vertical extent of soil contamination. Note these wells would be removed during the excavation activities discussed further below.

Horizontal Extent Groundwater Sampling - This element includes installation of six groundwater monitoring wells within the Hoover Street right-of-way as shown on **Figure 7, Proposed Data Gap Work Plan Activities**. The purpose would be to delineate the northern and southern limits of the groundwater plume along the proposed PRB groundwater treatment system.

Hydraulic Assessment - This element includes installation of a new extraction well and piezometer[1] to assess groundwater velocity and hydraulic conductivity (see **Figure 7, Proposed Data Gap Work Plan Activities)**. The hydraulic assessment would consist of pump tests conducted in the well to quantify aquifer hydraulic properties (e.g., the rate at which groundwater flows through subsurface materials).

Groundwater obtained from the project site would undergo off-site laboratory testing to assess effectiveness of the potential permeable reactive barrier. Upon completion of acquiring the data summarized above, the RAP would be updated describing the final proposed remedial design. This updated RAP would be submitted to the RWQCB for their review and approval. Note that remediation (and, thus, the proposed project) may not proceed until the RWQCB approves of the RAP.

[1] A piezometer is a device that measures characteristics such as groundwater elevations and pore water pressure.



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SOURCE: Tetra Tech, 2021

Hoover Street District Yard Demolition and New Power District Yard Project

Figure 7
Proposed Data Gap Work Plan Activities

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Demolition of Existing Structures

Demolition of existing structures on the project site is expected to occur from spring 2023 through summer 2023 and would include the removal of all aboveground structures and walls. Hazardous building materials (e.g., asbestos-containing materials [ACM], lead-based paint [LBP]) is present in some on the existing onsite structures. Hazardous building materials would be disposed of at a licensed off-site disposal facility permitted to accept the waste materials. Non-hazardous materials will be recycled if possible or disposed of at the Sun Valley Landfill, a licensed Class III non-hazardous waste facility permitted to accept non-hazardous waste. In addition, the existing 15 onsite monitoring wells will remain in place during demolition. Some or all will need to be abandoned prior to excavation. The wells installed as part of the Data Gap Work Plan that are located in the proposed excavation areas may not need to be sealed if the excavation would remove the entire well.

Soil Excavation

Soil remediation is expected to occur between after the demolition phase and before the redevelopment work for a duration of approximately 5 to 6 months from spring to fall 2026. The excavation phase would include demolition of foundations and hardscaping, excavation of contaminated soil, and excavation of soil for the subsurface parking structures. As shown on **Figure 6, Proposed Soil Excavation, Vapor Barrier and Permeable Reactive Barrier**, soil in the southeast corner of the site would be excavated up to 20 feet below ground surface (bgs) while areas in the east northeast of the project site would be excavated at depths of up to 50 feet bgs. Up to about 50,000 cubic yards (CY) of soil would be excavated and disposed of at off-site disposal facilities. Pending the results of the data gap investigation summarized above, about 18,000 CY of clean soil (i.e., soil that does not have contamination above regulatory action levels) is anticipated for disposal at the Sun Valley Landfill, a licensed Class III non-hazardous waste facility permitted to accept non-hazardous waste. Up to 32,000 CY of contaminated soil would be disposed of at a licensed Class 1 hazardous waste landfill.

Construction of Subterranean Parking Structure, Vapor Barrier, and PRB Groundwater Treatment System

Excavation and shoring for the subsurface parking structure is tentatively scheduled to commence in fall 2026 and is expected to require 4 to 5 months to complete. Following excavation and shoring, the concrete deck would be poured. Therefore, the parking deck would be completed by early 2027, so that construction staging and worker parking can be moved onsite.

For the subsurface parking structure, a drilling auger would be used to set soldier piles and vertical (steel) beams for the construction of the 88,380 sf subterranean parking structure. The total depths of excavation activity could extend as deep as 50 feet bgs. A total of 270 soldier piles are required and would be spaced every 4 feet. Due to the depth of the subterranean parking structure, it is anticipated that two soldier piles would be drilled and filled each day. The construction of the subterranean parking structure would require the use of a drilling rig for approximately 75 days. During the grading phase of construction, this would include up to 24 haul trucks per day transporting excavated soils to their appropriate location. The subterranean

parking structure would then be completed with steel-rebar and concrete floors, ceiling, and walls.

At the same time the subterranean parking structure is installed, the PRB groundwater treatment system would be installed up to 50 feet bgs on the project site parallel to Hoover Street on the upgradient side of the project site to control onsite migration of VOC-impacted groundwater from a former dry cleaning facility. The location of the PRB groundwater treatment system is shown on **Figure 6, Proposed Soil Excavation, Vapor Barrier and Permeable Reactive Barrier**. Additionally, a vapor barrier would be installed under the parking structure, as well as the locations of all other surface structures that would be used by people to mitigate potential vapor intrusion from the contaminated groundwater.

Construction of Surface Structures and Utilities

Construction of the proposed project is expected to last approximately 2.5 years and is tentatively scheduled to begin in fall 2026 (with installation of the subterranean parking structure, vapor barrier, and PRB groundwater treatment system) and continue through winter 2028.

Construction would include site preparation, installation of drainage and utilities, building construction, and application of architectural coatings. During the site preparation phase, approximately 88,380 sf of the project site would be paved. Construction would require approximately 4 acre-feet (AF) of water. The surface structures to be constructed are shown on Figures 3 and 4. Utility connections for both electricity and water would remain in place. Electricity is currently distributed through a 50 kVA transformer. Water is currently provided through a 4-inch domestic pipe, which is connected to an 8-inch water main that is located in North Hoover Street.

Installation of Monitoring Wells

Upon completion of surface construction activities, the onsite monitoring well network would be reinstalled. The purpose of the groundwater monitoring system is to monitor the progress of groundwater cleanup and identify when the cleanup has been completed to the satisfaction of the RWQCB. Up to 15 groundwater monitoring wells would be installed at locations that would not interfere with the project's operations. Upon completion of groundwater cleanup, the monitoring wells would be sealed in place by filling the wells with a bentonite-cement grout. The reinstallation of the well network would require submitting a work plan to the RWQCB for their review and approval.

Construction Equipment, Access, Traffic, and Hours

Construction equipment that would be used as a part of the proposed project is listed below:

- Excavator
- Backhoe
- Welding equipment
- Loader/Dozer
- Paving equipment
- Dump truck
- Water truck
- Grader
- Service utility truck
- Saw-cutting equipment
- Drilling auger
- Scraper
- Steam roller
- Forklift
- Crane
- Cement and Mortar Mixer
- Power generators
- Small tools
- Shoring equipment
- Air Compressor
- Paver

During project construction, access to the project site would be provided via North Hoover Street only. Once the subterranean parking structure is completed, construction workers would access the site via Clinton Street and park in the subterranean parking structure. Construction staging during implementation of the Data Gap Work Plan starting in 2021 would occur in an off-site parking lane, as permitted by the City of Los Angeles. When construction of the proposed facility initiates again in 2026 and after completion of the subterranean parking structure in 2027, construction staging would be moved onto the project site.

Construction-related traffic on the local roadways would occur, and the daily maximum number of vehicle trips is estimated to be 218. This includes worker trips, heavy-duty trucks hauling construction debris and/or delivering construction materials to the project site. Construction vehicles would exit the facility from North Hoover Street and head to the landfill using the US-101 N and CA-170 N. All existing project site staff have been relocated to an alternative maintenance yard, as all street lighting maintenance would be relocated to another facility.

Consistent with the Los Angeles Municipal Code, construction is expected to occur between the hours of 7:00 a.m. and 9:00 p.m. on Monday through Friday. No nighttime construction would occur, and no construction would occur on Sundays or federal holidays. Some construction activities may take place on Saturday's between the hours of 8:00 a.m. and 3:00 p.m. The number of construction workers and construction equipment would vary throughout the construction process in order to maintain an effective schedule of completion. It is estimated that during the construction period the number of workers that would be on site would range from approximately 10 to 75, with a peak of approximately 75 workers during the excavation and concrete pouring phases of vertical construction.

Operation and Maintenance

The proposed project would increase the number of employees at the project site from 52 to approximately 102 full time staff. Of the 102 new full time employees, 20 would be office staff, 79 would be fleet staff, and 3 would be fleet maintenance staff. The project would not increase the number of fleet vehicles stationed on site during project operation. The site currently

maintains 39 fleet vehicles consisting of pick-up trucks, aerial bucket trucks, a small auger digger, pitman boom trucks, temporary transformer trailers, forklifts, dodge sedans, a stake bed truck, and a step van. Staff hours on Mondays and Fridays begin at 6:30 a.m. and conclude at 4:00 p.m. Staff hours from Tuesday through Thursday begin at 6:30 a.m. and conclude at 4:30 p.m. Staff hours on Saturday begin at 6:00 a.m. and conclude at 4:30 p.m. Staff would also work a Sunday shift every other week that would begin at 6:00 a.m. and conclude at 4:30 p.m. In the event of an emergency situation, the proposed facility would operate as a 24-hour facility for the duration of the emergency event. All entrances to the site would be gated with card reader access. Security offices would be located on the 1st floor lobby of the District Office Building to monitor pedestrian and vehicle access onto the site. Facility maintenance staff would support all maintenance activities. Visitors and outside vehicles would be required to check in with an on-site security officer in order to gain site access.

In terms of the soil and groundwater remediation, the PRB groundwater treatment system would require operation, maintenance, and monitoring, including remedial performance monitoring, sampling and analysis as required by Waste Discharge Requirements, and replenishing the permeable reactive barrier media, as necessary. The groundwater monitoring program is anticipated to last 30 years.

1.5 Potential Project Issues

Potential project issues include potential impacts from hazardous materials onsite, construction noise impacts, and pedestrian access during construction activities. Currently, there are two existing buildings onsite, the office and tool house, that have been tested positive for ACMs. These buildings would be demolished as a part of the proposed project. In addition, soil and groundwater testing on the project site has indicated that the soils and groundwater are contaminated with chlorinated VOCs (specifically, PCE and TCE) from an off-site former dry cleaner. Because of this contamination, the proposed project includes soil excavation and off-site disposal, groundwater monitoring, and installation of a PRB and a vapor barrier under buildings and the parking structure, as detailed in the Draft RAP. Potential construction noise impacts could occur, given the location of the single and multi-family housing directly adjacent and north of the project site. In addition to these potential issues, there are two schools within 0.25 mile of the project site and pedestrians, mainly children, walk along Clinton Street on a daily basis. These potential issues will be considered in the Initial Study analysis.

1.6 Required Approvals

Table 2, Discretionary Permits Potentially Required, presents a preliminary list of the agencies and entities with discretionary approval over the proposed project.

TABLE 2
DISCRETIONARY PERMITS POTENTIALLY REQUIRED

Agency	Permits and Authorizations Required	Activities Subject to Regulations
California Department of Industrial Relations, Division of Occupational Safety and Health, Mining and Tunneling Unit	Permit for construction operations involving human entry (underground parking lot)	Shafts: Excavations twice the depth of cross section or exceeding 20 feet; Underground chambers
California State Division of Occupational Safety and Health	Permit for subterranean construction	Any excavation activity 5 feet or deeper
State Water Resources Control Board (SWRCB)	National Pollutant Discharge Elimination System (NPDES) Construction General Permit and its required Stormwater Pollution Prevention Plan (SWPPP)	Construction on a site greater than 1 acre in size
Los Angeles RWQCB	NPDES Permit for Construction Dewatering	Groundwater dewatering encountered during construction
Los Angeles RWQCB	• General WDR (Order No. R4-2014-0187) for In-Situ Groundwater Remediation and Groundwater Re-Injection; • Work plan for installation of monitoring well network	Soil and groundwater remediation
Los Angeles County	• Permit for well installation and well abandonment	Soil and groundwater remediation
City of Los Angeles Bureau of Engineering	Shoring Permit	Excavation and construction activities that occur adjacent to City rights-of-way
City of Los Angeles Fire Department	Permitting for diesel fueling stations	Installation of diesel fueling stations
City of Los Angeles Department of Transportation	Traffic Control Plan and Traffic Signal Plan	Traffic lane closures and transportation related issues during soil and groundwater remediation and construction activities
City of Los Angeles Department of Public Works, Bureau of Engineering	• Construction Permit for disturbance to curbs, gutters, sidewalks, drains, or driveways; • Permit for installation of monitoring wells in the public right-of-way; • LADBS grading permit for placement of compacted fill soil	Soil and groundwater remediation; construction
City of Los Angeles Department of Public Works, Road Maintenance District Urban Forestry Unit	Authorization for tree removal	Tree removal within parkway
South Coast Air Quality Management District	Permit for use of combustion engines greater than 50 horsepower (hp)	Construction
South Coast Air Quality Management District	Permit to operate portable soil/vapor extraction units at a location for 5 days or more in compliance with Rule 203 • Compliance with Rule 401 Visible emissions; • Rule 402 Nuisance, including odors; • Rule 403 Fugitive dust; • Rule 1166 Excavation of VOC-impacted soil; • Rule 1415 Reduction of Refrigerant Emissions from Stationary Refrigeration Systems • Rule 1466 Control of Particulate Emissions from Soils with Toxic Air Contaminants	Soil and groundwater remediation; construction

SECTION 2
Environmental Checklist

1. Project Title:	Hoover Street District Yard Demolition and New Power District Yard 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:	Aiden Leong, (213) 367-0706
4. Project Location:	611 North Hoover Street (Northeast of intersection of Commonwealth Avenue and Clinton Street), Los Angeles, CA 90026
5. Project Applicant/Sponsor:	Same as Lead Agency
6. General Plan Designation(s):	Public Facilities
7. Zoning Designation(s):	PF-1XL
8. Description of the Project:	See Project Description above
9. Surrounding Land Uses and Setting:	Medium residential to the north, low medium residential to the west and south, neighborhood commercial to the east. The DS-15 building, a public facility, is also located to the southwest.
10. Other Public Agencies Whose Approval is Required:	See Required Approvals Above

Environmental Factors Potentially Affected

The proposed project could potentially affect the environmental factor(s) checked below. The following pages present a more detailed checklist and discussion of each environmental factor.

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

Determination

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, no further environmental documentation is required.

Nadia Parker Digitally signed by Nadia Parker
Date: 2021.06.15 08:48:05 -07'00'

Signature Date

Charles C. Holloway
Manager of Environmental Assessment and Planning
Los Angeles Department of Water and Power

Aesthetics

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. 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 (City of Los Angeles 2001a). There are no designated scenic vistas in the City of Los Angeles General Plan or Wilshire Community Plan (City of Los Angeles 2002; City of Los Angeles 2001b) on or near the project site. However, LADWP Distributing Station No. 15 is located approximately 20 feet south of the project site at 604 North Commonwealth Avenue and as described below in the *Cultural Resources* section, is considered a historic resource under CEQA. Thus, this resource could potentially be considered a scenic vista, as defined by the City of Los Angeles. However, scenic vistas are typically panoramic public views and there are no such public viewing areas in the project vicinity that have a panoramic view of this resource. Furthermore, construction of the proposed project would replace existing development in a highly developed area and would not block or restrict views of LADWP Distributing Station No. 15. Therefore, the proposed project would not adversely affect a scenic vista and impacts would be less than significant.

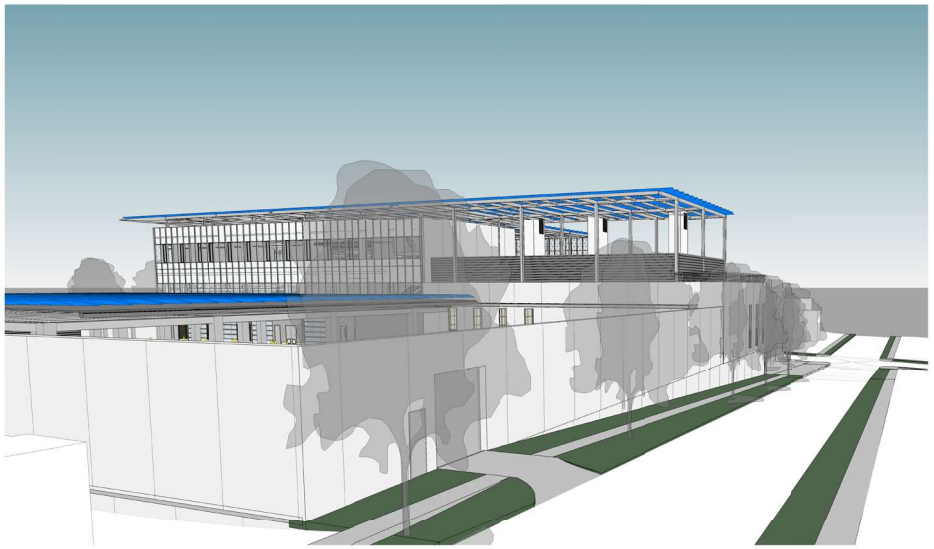
b) No Impact. There are no officially-designated State Scenic Highways in the vicinity of the project site, nor are there any known scenic resources or rock outcroppings in close proximity to the project site. While there is a historic resource adjacent to the project site, as discussed below in the *Cultural Resources* section, there are no State Scenic Highways in the vicinity of the project site that have a view of this resource and the proposed project would not have an impact on this resource. State Route (SR) 110, located approximately 3.5 miles east of the project site, is an officially designated Historic Parkway by the California Department of Transportation (Caltrans), also referred to as the Arroyo Seco Historic Parkway. In addition, SR-210 is located approximately 8.5 miles northeast of the project site and is designated as an Eligible State Scenic Highway (Caltrans 2017). Given the project site's distance from SR-210 and SR-110, the proposed project

would not be visible from either of these highways. Therefore, the proposed project would not impact scenic resources within a designated State Scenic Highway corridor and no impacts would occur.

c) Less-than-Significant Impact. The project site is located in a highly urbanized area within the East Hollywood neighborhood, which is within the Hollywood Community Plan area in the City of Los Angeles. Therefore, the applicable threshold with respect to the project is consistent with applicable zoning and other regulations governing scenic quality. The project site is a public facility maintenance yard and visually, has industrial characteristics including a warehouse, maintenance shop, storage, sheds, and employee parking. The area surrounding the project site is visually characterized by residential, institutional, and commercial uses. Thus, the visual character of the project site and surrounding uses are of an urban nature with uses that are typically thought to be incompatible coexisting side by side.

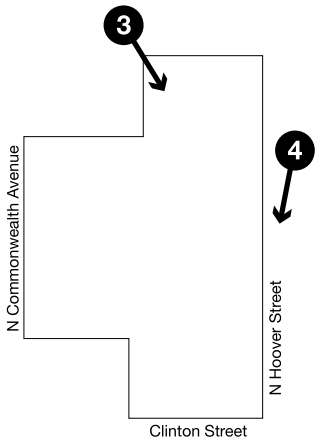
As part of the proposed project, existing uses would be demolished and new facilities constructed would serve to operate in a similar capacity. The proposed project would feature a contemporary design and materials, including textured concrete and steel. As shown in **Figure 8, Street Views Looking South,** and **Figure 9, Street Views Looking North,** the buildings developed as a part of the project would be large in size, scale, and massing, and would feature a trellis on the southern portion of the building. In addition, solar panels would create shading structure over the main part of the building. While visually distinctive, the architectural features, materials, and finishes of the project would generally be compatible with nearby uses, including the Distributing Station No. 15, and would not materially alter any of the visual character of surrounding uses. Further, because the existing maintenance yard is dilapidated, the proposed three-story Office Building, SCS Warehouse, and Fleet Maintenance facility would potentially enhance and improve the visual character of the project site from surrounding public views. In addition, street trees would be planted that would soften the view of the proposed project from public viewing areas. Thus, the proposed project would result in a beneficial impact on the visual character in the project area. The visual character of the institutional and residential structures located across the street from the project site, as well as the residential uses located directly adjacent to the project site would not be altered by development of the proposed project. Therefore, the proposed project would not substantially degrade the existing visual character or quality of the site and its surroundings.

According to the City of Los Angeles General Plan, the project site has a land use designation of Public Facilities and is zoned as PF-1XL (Public Facilities within an extra low height district) (City of Los Angeles 2017a). Allowed uses under the Public Facilities zoning include agricultural uses, parking under freeways, fire and police stations, government buildings, public libraries, post offices, public health facilities, public elementary and secondary schools (City of Los Angeles 2006). Areas near the project site are designated as residential and commercial uses (City of LA 2017).



VIEW 3: View from Commonwealth Ave. looking southeast

VIEW 4: View from Hoover St. looking southwest



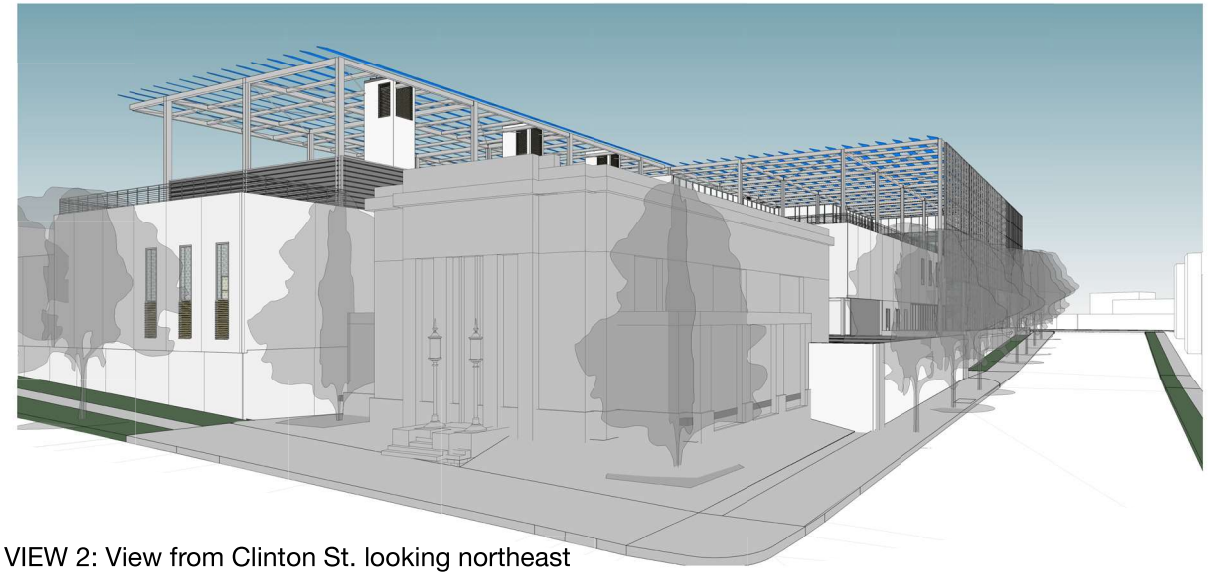
SOURCE: East Hollywood District Yard Schematic Master Plan, 2019

Hoover Street District Yard Demolition and New Power District Yard Project

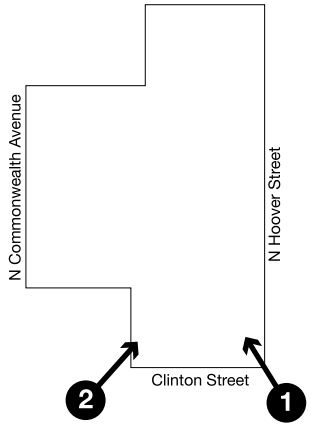
Figure 8
Street Views Looking South

ESA

VIEW 1: View from Hoover St. looking northwest



VIEW 2: View from Clinton St. looking northeast



SOURCE: East Hollywood District Yard Schematic Master Plan, 2019

Hoover Street District Yard Demolition and New Power District Yard Project

Figure 9
Street Views Looking North

ESA

Although the PF-1XL zoning designation does not allow for building height's greater than 35 feet, construction of the proposed project is exempt from the zoning requirements set forth for the project site. The project is defined as a "power asset" under Charter Section 672(b) of the Los Angeles Municipal Code (LAMC), which encompasses all the electric energy rights, lands, right-of-way, sites, facilities, and property used for generation, distribution, transportation, and delivery of power for the benefit of the City, its inhabitants, and its customers. As such, the City's Power Assets are under control of the Board of LADWP Commissioners (the Board), and subject to oversight by the Los Angeles City Council under Charter Section 245 of the LAMC. Specifically, the Board has "the power and duty to make and enforce all necessary rules and regulations governing the construction, maintenance, operation, connection to and use of the Water and Power Assets for (LADWP) Purposes." Thus, the project's proposed height is not in conflict with the LAMC. Therefore, the proposed project would not constrain or change the existing land uses within the project site and would replace the existing public facility with another public facility.

Furthermore, the proposed project would be within the Hollywood Community Plan area and would be required to be consistent with Objective 7 of the Plan, which states: "To encourage the preservation of open space consistent with property rights when privately owned and to promote the preservation of views, natural character and topography of mountainous parts of the Community for the enjoyment of both local residents and persons throughout the Los Angeles region," is pertinent to scenic quality. As stated above, because the existing maintenance yard is dilapidated, the proposed three-story Office Building, SCS Warehouse, and Fleet Maintenance facility would potentially enhance and improve the visual character of the project site from surrounding public views. In addition, street trees would be planted that would soften the view of the proposed project from public viewing areas. Thus, the proposed project would result in a beneficial impact on the visual character in the project area and not negatively impact the preservation of views, natural character and topography of the Community.

Therefore, the project would maintain consistency with the site's current zoning and would not create a conflict with the intended use of the project site. The project would not conflict with applicable zoning and other regulations governing scenic quality and impacts would be less than significant.

d) Less-than-Significant Impact. Project construction lighting would increase the low level of existing nighttime lighting at the project site. However, the project area is an urbanized setting characterized by a moderate amount of nighttime lighting. Construction activities would occur between the hours of 7:00 a.m. and 9:00 p.m. on Monday through Friday. No nighttime construction would occur, and no construction would occur on Sundays or federal holidays. Some construction activities may take place on Saturday's between the hours of 8:00 a.m. and 3:00 p.m. While construction would not occur during nighttime hours, construction-related nighttime lighting would be used at the construction site only for safety and security purposes. For these reasons, project construction lighting would not would not adversely affect day or nighttime views in the area and construction lighting impacts would be less than significant.

Operation of the proposed facilities would require use of external night security lighting; however, given the project site's urbanized setting this amount of night lighting is not expected to substantially exceed existing nighttime lighting levels on the project site.[2] Furthermore, the project's exterior lighting, such as security lighting would be shielded and directed downward, and would avoid direct illumination of adjacent properties in accordance with LAMC lighting regulations. Thus, the proposed project would not generate excessive lighting that would adversely affect daytime or nighttime views in the area and operational lighting impacts would be less than significant.

Daytime glare is most often associated with mid- to high-rise buildings with exterior façades comprised largely or entirely of highly reflective glass or other reflective materials from which the sun can reflect, particularly following sunrise and prior to sunset. The structures proposed as a part of the project would be up to three-stories (65 feet) in height and, thus, do not qualify as either mid- or high-rise buildings. Furthermore, the project's structures would be painted and finished with non-reflective material and, thus, would not generate a substantial amount of glare. To fully benefit from the energy efficiency of the structure, and electrochromic glazing curtainwall system would be installed to ensure that solar loads are reduced in the building as needed. Solar panels would be constructed on the roofs of the District Office building, the fueling stations, and the fleet parking as shown on Figure 4. The panels would not be expected to cause extreme visual discomfort or impairment of vision for residents or motorists because the panels are designed to absorb as much sunlight as possible and, therefore, would have minimal reflectivity. Additionally, the panels would be elevated on roofs and would therefore be shielded from motorists traveling below. The type of glare that could be expected in the most extreme conditions, when the sun is low in the sky, is a level of veiling reflection that may cause viewers to be less able to distinguish levels of contrast, but would not cause a temporary loss of vision. Therefore, implementation of the proposed project would not result in a substantial new source of light or glare that could affect nighttime views in the area and impacts would be less than significant.

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[2] In the event of an emergency situation, the proposed facility would operate as a 24-hour facility for the duration of the emergency event.

Agriculture and Forestry Resources

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
II. 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 Department 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. According to the City of Los Angeles General Plan, the project site has a land use designation of Public Facilities and is zoned as PF-1XL (Public Facilities within an extra low height district) (City of Los Angeles 2017a). Allowed uses under the Public Facilities zoning include agricultural uses, parking under freeways, fire and police stations, government buildings, public libraries, post offices, public health facilities, public elementary and secondary schools (City of Los Angeles 2006). Areas near the project site are designated as residential and commercial uses (City of LA 2017). According to the California Resources Agency Farmland Mapping and Monitoring Program (FMMP), there is no Prime Farmland, Unique Farmland, or Farmland of Statewide Important within or adjacent to the project site (CDOC 2016a). Therefore, no impacts to land designated under the FMMP would occur.

b) No Impact. The project site is designated and zoned as Public Facilities. No agricultural uses are identified on the project site and the site is not under a Williamson Act contract (CDOC 2016b). Therefore, the proposed project would not conflict with agricultural zoning or a Williamson Act contract and no impact would occur.

c) No Impact. The project site is designated and zoned as Public Facilities. The project site and adjacent lands are not zoned for forest land, timberland, or timberland zoned for timberland production. Thus, no impacts would occur to lands zoned for forest land or timberland.

d) No Impact. The project site is designated and zoned as Public Facilities. The project site is not located on forest land or zoned as forest land. Development of the proposed project would not convert forest land to non-forest land. Therefore, no impacts to forest land would occur.

e) No Impact. See Items 2.2(a) and 2.2(d) above. The proposed project would not convert potential farmland or forest land to non-agriculture/non-forestry use. Therefore, no impacts would occur to agriculture or forestry resources.

Air Quality

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
III. 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 South Coast Air Basin (Basin). Air quality planning for the Basin is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The project would be subject to the SCAQMD's Air Quality Management Plan (AQMP), which contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG).

The SCAQMD Governing Board adopted and California Air Resources Board (CARB) approved the 2016 AQMP in March 2017. 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, energy, transportation and other planning efforts (SCAQMD 2017). The strategies included in the 2016 AQMP are intended to demonstrate attainment of the National Ambient Air Quality Standards (NAAQS) for the federal non-attainment pollutants ozone and $PM_{2.5}$ (SCAQMD 2017). Projects that are consistent with the assumptions used in the AQMP do not interfere with attainment because the growth is included in the projections utilized 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 it would individually exceed the SCAQMD's numeric indicators.

Project Design Features

The proposed project would implement project design features (PDFs) to minimize the environmental impacts of the project:

- **PDF-AQ-1: Construction Features.** During project construction, the project will utilize off-road diesel-powered construction equipment that meets or exceeds the CARB and USEPA Tier 4 Final off-road emissions standards for equipment rated at 50 hp or greater, and use electric welders or equivalent alternatives that reduces off-road equipment emissions. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) will be available upon request at the time of mobilization of each applicable unit of equipment.

Construction

Construction activities associated with the proposed project have the potential to generate temporary criteria pollutant emissions through the use of heavy-duty construction equipment, such as excavators and compactors, and through vehicle trips generated from worker trips, vendor and haul trucks traveling to and from the proposed project area. In addition, fugitive dust emissions would result from demolition, excavation, and various soil-handling activities. Mobile source emissions, primarily oxides of nitrogen (NO_X), would result from the use of construction equipment such as dozers and loaders. 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. Project construction is estimated to start in 2021 and is conservatively modeled for air quality to have sequential phases through 2026. In reality, LADWP likely would initiate construction in 2026 (after a period of inactivity) through 2028 as explained in Section 1.4, *Project Overview*. If this occurs, construction impacts would be lower than those analyzed herein due to the use of a more energy-efficient and cleaner burning construction vehicle fleet mix, pursuant to State regulations that require vehicle fleet operators to phase-in less polluting heavy-duty equipment.[3] As a result, should project construction phases commence at a later date than analyzed for air quality below, air quality impacts would in actuality be lower than the impacts disclosed herein.

[3] In 2008, CARB approved the Truck and Bus regulation to reduce NOX, PM10, and PM2.5 emissions from existing diesel vehicles operating in California (13 CCR, Section 2025). The requirements were amended to apply to nearly all diesel-fueled trucks and buses with a gross vehicle weight rating greater than 14,000 pounds. For the largest trucks in the fleet, those with a gross vehicle weight rating greater than 26,000 pounds must comply with a schedule by engine model year or owners can report to show compliance with more flexible options, such as the installation of PM filters or low-use exemption. In addition to limiting exhaust from idling trucks, CARB also adopted emission standards for off-road diesel construction equipment of greater than 25 horsepower, such as bulldozers, loaders, backhoes and forklifts, as well as many other self-propelled off-road diesel vehicles. The In-Use Off-Road Diesel Fueled Fleets regulation adopted by the CARB on July 26, 2007, aims to reduce emissions by the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission controlled models (13 CCR, Section 2449).

Under this criterion, the SCAQMD recommends 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) 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 (maximally 75 workers per day) 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, potentially applicable to control temporary emissions from construction activities, include ONRD-04 and OFFRD-01,[4] which are intended to reduce emissions from on-road and off-road heavy-duty vehicles and equipment by accelerating the replacement of older, emissions-prone engines with newer engines that meet more stringent emission standards.

As described in the sections below, this project would have less-than-significant construction emissions of criteria pollutants. As per PDF-AQ-1, the project would use electric welders and require all off-road diesel construction equipment greater than 50 hp used for this project to meet USEPA Tier 4 Final off-road emission standards or equivalent, which would not only minimize PM and NO_X emissions during construction activities, but also support implementation of the AQMP strategies by accelerating the use of cleaner construction equipment and vehicles. Therefore, the project would be consistent with the AQMP. For each piece of off-road equipment, a copy of its engine certification or model year specification will be available upon request at the time construction begins. Additionally, the project would comply with CARB requirements to minimize short-term emissions from on-road and off-road diesel equipment. The project would also comply with SCAQMD regulations for controlling fugitive dust pursuant to SCAQMD Rule 403 These regulations include application of water spray/mists or similar suppressant (e.g., SoilSeal) at least three times per day on active areas of disturbance and unpaved roads, and limiting truck speed to 15 miles per hour or less on unpaved roads to minimize dust on unpaved roads at the construction site.

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.

During the grading phase of construction, this project would include up to 19 haul trucks per day transporting contaminated soil from the project site to a hazardous waste landfill facility. For the purposes of this analysis, the hazardous waste facility is assumed to be Kettleman Hills Landfill. located in the San Joaquin Valley Air Basin). The trip length would be 66 miles within the SCAB and maximally 128 miles outside the SCAB. Given that the project includes a limited number of

[4] AQMP measure ONRD-04 applies to on-road mobile sources and is the accelerated retirement of older on-road heavy-duty vehicles to reduce emissions of NO_X and particulate matter. AQMP measure OFFRD-01 applies to off-road mobile sources and is the extension of the Surplus Off-Road Opt-In for NO_X (SOON) provision for construction/industrial equipment to encourage the accelerated retirement of older off-road heavy-duty equipment to reduce emissions of NO_X. http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2012-air-quality-management-plan/final-2012-aqmp-(february-2013)/chapter-4-final-2012.pdf. Accessed October 2017.

trucks per day traveling outside of the SCAB, this project would not conflict with any air quality management plans and would have negligible regional or localized air quality impacts outside the SCAB.

Operation

The project site is currently zoned as PF-1XL (Public Facilities within an extra low height district). The site currently operates as a LADWP Streetlight Facility and the project site would be redeveloped by removing the aging, inefficient buildings and replacing with new structures that incorporate energy-efficient design features. In addition to meeting the energy efficiency measures that are required by regulation, such as the current Title 24 standards, the California Green Building Standards (CALGreen) Code, and the City's Green Building Code, the project would also incorporate features that would reduce energy and water consumption by meeting criteria above the United States Green Building Council's (USGBC's) LEED Gold level. The current facility has 52 employees and the project would result in a total of approximately 102 employees, a growth of 50 employees. SCAG's employment growth forecast for the City for the period between 2012 and 2040 is 472,700; the project's employment growth is well within SCAG's forecast when considered with other projects to be implemented in this timeframe. During each operation day, the project would have a maximum net increase of 120 vehicle trips. As discussed in the *Transportation and Traffic* section below, this project would not have a significant impact on transportation or traffic. Overall, the project would not conflict with the growth projects identified in the AQMP and would not conflict with or obstruct implementation of the AQMP's or the City's strategies and polices intended to reduce criteria pollutant emissions. Therefore, impacts would be less than significant.

b) Less-than-Significant Impact. The project would result in the emission of criteria pollutants during both construction and operation for which the project area is in non-attainment. A significant impact may occur if a project would add a cumulatively considerable contribution of a federal or State non-attainment pollutant. The Air Basin is currently in non-attainment for ozone, PM_{10}, and $PM_{2.5}$.

The SCAQMD's approach for assessing cumulative impacts related to operations is based on attainment of ambient air quality standards in accordance with the requirements of the Federal and State Clean Air Acts (CAAs). As discussed earlier, the SCAQMD has developed a comprehensive plan, the 2012 AQMP, which addresses the region's cumulative air quality condition.

A significant impact may occur if a project were to add a cumulatively considerable contribution of a federal or State non-attainment pollutant. The Basin is currently in non-attainment for ozone (federal and State standards), PM_{10} (State standards only) and $PM_{2.5}$ (federal and State standards); therefore, 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 2012 AQMP. As discussed previously under Item 2.3(a) above, the project would be consistent with the 2012 AQMP and would not have a cumulatively considerable air quality impact. Although the project's employment would increase compared to existing conditions, this growth would be well within the employment growth projections for the City.

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 shown in **Table 3, Maximum Regional Construction Emissions, without Mitigation (pounds per day),** and **Table 4, Maximum Unmitigated Regional Operational Emissions (pounds per day)**, peak daily emissions of construction and operation-related pollutants would not exceed SCAQMD regional significance thresholds. By applying SCAQMD's cumulative air quality impact methodology, even though implementation of the project would result in an addition of criteria pollutants, in conjunction with related projects in the region, cumulatively significant impacts would not occur. In addition, as discussed in Item 2.3(d), below, construction of the project is not expected to result in a cumulatively considerable net increase of any criteria pollutant for which the SCAQMD has established a localized impact threshold. Therefore, the emissions of non-attainment pollutants and precursors generated by the project would be less than significant and would not result in a cumulatively considerable air quality impact.

TABLE 3
MAXIMUM REGIONAL CONSTRUCTION EMISSIONS, WITHOUT MITIGATION (POUNDS PER DAY)

Source	VOC	NO_X	CO	SO_2	PM_{10}[a]	$PM_{2.5}$[a]
Data Gaps Work Plan - 2021	1	15	17	<1	2	<1
Data Gaps Work Plan - 2022	<1	4	14	<1	<1	<1
Demolition & Abatement - 2022	<1	5	16	<1	1	<1
Excavation & Soil Remediation - 2023	1	18	23	<1	7	3
Site Preparation - 2023	<1	2	13	<1	1	<1
Shoring - Drive Piles - 2023	<1	1	6	<1	<1	<1
Shoring - Drill Tiebacks - 2023	<1	1	6	<1	<1	<1
Shoring - Drill Tiebacks - 2024	<1	1	6	<1	<1	<1
Bore Caissons – 2024	<1	1	6	<1	<1	<1
Foundations/Concrete Pour - 2024	<1	5	17	<1	2	1
Building Construction - 2024	1	11	17	<1	1	<1
Building Construction - 2025	1	10	17	<1	1	<1
Building Construction - 2026	1	10	17	<1	1	<1
Paving - 2026	<1	2	14	<1	1	<1
Architectural Coatings - 2026	26	<1	3	<1	<1	<1
Installation of Monitoring Wells - 2026	1	9	17	<1	2	1
Overlapping Phases						
Shoring - Drill Tiebacks + Bore Caissons - 2024	<1	2	11	<1	1	<1
Bore Caissons + Foundations/Concrete Pour - 2024	1	6	22	<1	3	1
Building Construction + Paving + Architectural Coatings - 2026	27	12	35	<1	2	1
Maximum Daily Emissions	**27**	**15**	**35**	**<1**	**6**	**2**
SCAQMD Significance Thresholds	75	100	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

NOTES:
Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix A.
[a] Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.
SOURCE: ESA, 2021.

TABLE 4
MAXIMUM UNMITIGATED REGIONAL OPERATIONAL EMISSIONS (POUNDS PER DAY)

Source	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Area[a]	2	<1	<1	<1	<1	<1
Energy[a]	<1	<1	<1	<1	<1	<1
Mobile	<1	2	6	<1	2	<1
Fleet Fuel Station	12	--	--	--	--	--
Total project Operational Emissions	15	2	7	<1	2	<1
Existing Operational Emissions	1	2	6	<1	1	<1
Net project Emissions	**13**	**<1**	**<1**	**<1**	**<1**	**<1**
SCAQMD Significance Thresholds	*55*	*55*	*550*	*150*	*150*	*55*
Exceeds Threshold?	No	No	No	No	No	No

NOTE:
Totals may not add up exactly due to rounding in the modeling calculations Detailed emissions calculations are provided in Appendix A.
[a] Operational area and energy emission estimates through CalEEMod were conservatively doubled to account for increased project land use square footages based on the newest site plans as compared to when the modeling was completed.
SOURCE: ESA, 2021

c) Less-than-Significant Impact. Certain population groups are especially sensitive to air pollution and should be given special consideration when evaluating potential air quality impacts. These population groups include children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. As defined in the SCAQMD CEQA Air Quality Handbook, a sensitive receptor to air quality is defined as any of the following land use categories: (1) long-term health care facilities, (2) rehabilitation centers, (3) convalescent centers, (4) retirement homes, (5) residences, (6) schools, (7) parks and playgrounds, (8) childcare centers, and (9) athletic fields. Sensitive receptors within a 0.25-mile radius of the project boundary include adjacent residential land uses and the Dayton Heights Elementary School.

The localized air quality analysis was conducted using the methodology described in the SCAQMD *Localized Significance Threshold Methodology* (June 2003, revised July 2008), 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 are applicable to NO_X, CO, PM_{10}, and $PM_{2.5,}$ For NO_X and CO, the thresholds are based on the ambient air quality standards. They represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. These ambient air quality standards were established at levels that provide public health protection and allow adequate margin of safety, including protecting the health of sensitive populations such as asthmatics, children, and the elderly. For PM_{10} and $PM_{2.5}$, the localized significant thresholds (LSTs) 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 these screening criteria that can be used to determine the maximum allowable daily emissions that would satisfy the localized significance thresholds 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 area in which the project is located, (2) the size of the project area, and (3) the distance between the project area and the nearest sensitive receptor.

Given that ozone formation occurs through a complex photo-chemical reaction between NO_X and VOCs in the atmosphere with the presence of sunlight, the impacts of ozone are typically considered on a basin-wide or regional basis instead of a localized basis. The SCAQMD has not established an LST for ozone. The health-based ambient air quality standards for ozone are as concentrations of ozone and not as tonnages of their precursor pollutants (i.e., NO_X and VOCs). It is not necessarily the tonnage of precursor pollutants that causes human health effects, but the concentration of resulting ozone or particulate matter. Because of the complexity of ozone formation and the non-linear relationship of ozone concentration with its precursor gases, and given the state of environmental science modeling in use at this time, it is infeasible to convert specific emissions levels of NO_X or VOCs emitted in a particular area to a particular concentration of ozone in that area. Meteorology, the presence of sunlight, seasonal impacts, and other complex chemical factors all combine to determine the ultimate concentration and location of ozone (SCAQMD 2014).

As expressed in the *amicus curiae* brief submitted for the *Sierra Club v. County of Fresno* case (SCAQMD, 2014; SJVAPCD, 2014), the CEQA criteria pollutants significance thresholds from the air district were set at emission levels tied to the region's attainment status, they are emission levels at which stationary pollution sources permitted by the air district must offset their emissions and CEQA project must use feasible mitigations, and they are not intended to be indicative of any localized human health impact that a project may have. Furthermore, available models today are designed to determine regional, population-wide health impacts, and cannot accurately quantify project-level health impacts. Therefore, it is infeasible to further connect the project level criteria pollutants emissions to the resulting human health impact at this time; therefore, the following discussions focused on comparing project emissions to the applicable SCAQMD LST thresholds.

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, plus the truck idling emissions (e.g., haul trucks and vendor trucks) that were calculated separately using the EMFAC emission factors for heavy-heavy-duty (HHD) vehicles. The closest existing sensitive receptors to the project are single and multi-family residential uses to the immediate north and surrounding area, as well as an elementary school to the west. The LST used for the localized significance impact analysis were based on a 2-acre site in the Central Los Angeles Source-Receptor Area with sensitive receptors located adjacent to the project site (i.e., 25 meters).

Construction Emissions

Table 5, Maximum Localized Construction Emissions, without Mitigation (pounds per day), identifies the localized impacts at the nearest receptor location in the vicinity of the project area without mitigation. The localized emissions during construction activities would not exceed SCAQMD's localized significance thresholds. Therefore, localized construction impacts would be considered less than significant.

TABLE 5
MAXIMUM LOCALIZED CONSTRUCTION EMISSIONS, WITHOUT MITIGATION (POUNDS PER DAY)

Source	NO_X	CO	PM_{10}[a]	$PM_{2.5}$[a]
Data Gaps Work Plan - 2021	2	12	<1	<1
Data Gaps Work Plan - 2022	2	12	<1	<1
Demolition & Abatement - 2022	1	15	<1	<1
Excavation & Soil Remediation - 2023	1	13	2	1
Site Preparation - 2023	1	12	<1	<1
Shoring - Drive Piles - 2023	1	4	<1	<1
Shoring - Drill Tiebacks - 2023	1	4	<1	<1
Shoring - Drill Tiebacks - 2024	1	4	<1	<1
Bore Caissons – 2024	1	4	<1	<1
Foundations/Concrete Pour - 2024	1	10	<1	<1

Source	NO_X	CO	PM_{10}[a]	$PM_{2.5}$[a]
Building Construction - 2024	1	10	<1	<1
Building Construction - 2025	1	10	<1	<1
Building Construction - 2026	1	10	<1	<1
Paving - 2026	1	13	<1	<1
Architectural Coatings - 2026	<1	2	<1	<1
Installation of Monitoring Wells - 2026	1	12	<1	<1
Overlapping Phases				
Shoring - Drill Tiebacks + Bore Caissons - 2024	1	9	<1	<1
Bore Caissons + Foundations/Concrete Pour - 2024	1	15	<1	<1
Building Construction + Paving + Architectural Coatings - 2026	2	26	<1	<1
Maximum Daily Emissions	**2**	**26**	**2**	**1**
SCAQMD Localized Significance Thresholds[b]	*108*	*1,048*	*8*	*5*
Exceeds Threshold?	No	No	No	No

NOTES:

Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix A.

[a] Emissions include fugitive dust control measures consistent with SCAQMD Rule 403, and Tier 4 Final engines for construction equipment greater than 50 hp.

[b] Localized Significance Thresholds (LST) were for a 2-acre project site with a 25-meter receptor distance.

SOURCE: ESA, 2021, Appendix A.

Operational Emissions

According to SCAQMD LST methodology, LSTs would apply to the operational phase of a proposed project if the project includes stationary sources or attracts mobile sources that may queue and idle at the site (e.g., warehouse or transfer facilities). With regard to on-site sources of emissions, the project would generate emissions resulting from sources such as consumer products and landscaping equipment. The project buildings and facilities would be electrically-powered; therefore, emissions associated with natural combustion (on-site natural gas consumption for heating, such as natural gas combustion in boilers and water heaters) would not occur. **Table 6, Maximum Localized Operational Emissions (pounds per day)**, summarizes the maximum localized operational emissions resulting from project operations, along with the localized significance thresholds. As shown, on-site sources of emissions would remain below SCAQMD LSTs and localized operational impacts would be less than significant.

TABLE 6
MAXIMUM LOCALIZED OPERATIONAL EMISSIONS (POUNDS PER DAY)

Source	NO_X	CO	PM_{10}[a]	$PM_{2.5}$[a]
Project Operational Emissions				
Area[a]	<1	<1	<1	<1
Mobile Idling	<1	<1	<1	<1
Fleet Fueling Station	--	--	--	--
Total Localized Project Operational Emissions	<1	<1	<1	<1
Total Localized Baseline Site Emissions	<1	<1	<1	<1
Net Maximum Localized Operational Emissions	**<1**	**<1**	**<1**	**<1**
SCAQMD Thresholds of Significance[b]	*108*	*1,048*	*2*	*2*
Exceeds Thresholds?	No	No	No	No

NOTES:
Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix A.

[a] Operational area and energy emission estimates through CalEEMod were conservatively doubled to account for increased project land use square footages based on the newest site plans as compared to when the modeling was completed.

[b] Localized Significance Thresholds (LST) were for a 2-acre project site with a 25-meter receptor distance.

SOURCE: ESA, 2021.

Carbon Monoxide Hotspots

A CO hotspot 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 (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 proposed project, to operate at LOS E or F.

CO decreased dramatically in the Basin with the introduction of the automobile catalytic converter in 1975. No exceedances of CO have been recorded at monitoring stations in the Basin in recent years and the Basin is currently designated as a CO attainment area for both the California Ambient Air Quality Standards (CAAQS) and NAAQS. As discussed below, it is not expected that CO levels at project-impacted intersections would rise to such a degree as to cause an exceedance of these standards.

Construction

Construction-related traffic on the local roadways would occur, and the daily maximum number of vehicle trips is estimated to be 218. Due to the small nature of these trips and anti-idling measures for heavy-duty trucks, it is unlikely to result in a CO hotspot. Additionally, construction-related vehicle trips would only be short-term in nature and would cease once construction activities have been completed.

Operation

Caltrans CO Protocol requires detailed analysis for intersections with LOS E or F. The SCAQMD recommends performing a CO hotspot analysis if a project triggers either of the two criteria: (1) increases the volume to capacity ratio by 2 percent or more for intersections rated at LOS D or worse, or (2) worsens an intersection's LOS from C to D. Based on the traffic impact analysis for future year 2023, none of the seven signalized intersections analyzed for impacts would trigger either of the two criteria. Therefore, a CO hotspot analysis is not needed per the Caltrans and SCAQMD criteria, and the project would result in less-than-significant impacts with respect to CO hotspots.

The proposed parking structure would be built in accordance with applicable City of Los Angeles Municipal Code requirements, and as such, would be required to provide for adequate ventilation, such as openings in the walls to allow for air circulation, and dispersion of potential emissions to acceptable ambient concentrations so as not to pose any public health hazards. Therefore, the parking structure would result in less-than-significant impacts with respect to CO hotspots. In summary, the proposed project would result in less-than-significant impacts with respect to CO hotspots.

Toxic Air Contaminants

Concentrations of toxic air contaminants (TACs), or in federal parlance, hazardous air pollutants (HAPs), 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 Health Risk Assessment (HRA)

Intermittent construction activities associated with the proposed project would result in short-term emissions of diesel particulate matter (DPM), which the State has identified as a TAC. The exhaust of off-road heavy-duty diesel equipment would contain DPM during general construction activities, such as demolition, excavation, installation of machinery, materials transport and handling, and building construction. In addition, excavation of contaminated soil would also expose nearby receptors to chlorinated VOCs, specifically PCE and TCE, both of which are carcinogens. However, due to the instant nature of excavation activities, release of chlorinated VOCs into the atmosphere during excavation has been found to be negligible (DTSC 2013). Therefore, this assessment only quantifies the DPM emissions associated with construction and contaminated soil excavation activities.

DPM 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 (Cal EPA), 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). OEHHA is responsible for developing and revising guidelines for performing HRAs under the State's Air Toxics Hot Spots Program Risk Assessment (AB 2588)

regulation. A construction HRA was performed for this project in accordance with the current OEHHA Guidance. The analysis incorporates the estimated construction emissions (DPM from construction equipment, haul truck/vendor truck traveling within 0.25 mile of project site and idling on site), as previously discussed and dispersion modeling using the USEPA AMS/EPA Regulatory Model (AERMOD) model with meteorological data from the closest SCAQMD monitoring station.

Construction DPM emissions from heavy-duty off-road equipment were modeled using the exhaust PM_{10} emissions estimated from CalEEMod. On-site idling emissions and off-site DPM emissions from haul trucks traveling within 0.25 mile of the project site were estimated using emissions factors from EMFAC2014. Even though the project would be required to comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than 5 minutes at a location, the study assumes that each truck will idle a maximum of 15 minutes on site due to queuing.

Dispersion modeling for health risk impacts was performed using the latest EPA AERMOD (Version 18081) dispersion model. The project used meteorological data from SCAQMD's Central Los Angeles Station (CELA). **Table 7, Project Dispersion Modeling Source Types**, shows the AERMOD source types used to represent the project's construction emissions sources. To evaluate the project construction's DPM impacts on the sensitive receptors, discrete receptors were placed 25 meters apart on nearby residential areas within 500 meters of the project site in AERMOD. In accordance with SCAQMD modeling guidance, receptor heights were set to 0 meters in order to analyze ground level impacts. The terrain file used for the project site was 10-meter resolution data from the National Elevation Dataset. This file was processed using AERMAP for receptors and sources. AERMOD model figures are provided in Appendix A.

TABLE 7
PROJECT DISPERSION MODELING SOURCE TYPES

Source	Source Type
Construction	
Off-road equipment	Multiple volume sources
Vendor truck idling	Multiple volume sources
Vendor trucks traveling within 0.25 mile of project site	Line-volume source

Health risk calculations were performed using a spreadsheet tool consistent with the OEHHA Guidance and CARB Hotspots Analysis and Reporting Program (HARP) version 2 spreadsheet methodology. **Table 8, Maximum Construction Related Carcinogenic Risk for Off-Site Sensitive Receptors**, summarizes the project's maximum potential carcinogenic risk values for the off-site sensitive receptors. It shows that the estimated cancer risk during construction would be below the significance threshold of 10 in a million at off-site sensitive receptors.

Table 9, Maximum Construction Related Chronic Hazardous Index for Off-Site Sensitive Receptors, summarizes the maximum chronic (annual) health impact from project construction. As shown, the project's maximum impact is well below the threshold of 1.0 for both the residential and school receptors without mitigation. As a result, non-cancer health impacts at sensitive receptors from construction of the project would be considered less than significant.

TABLE 8
MAXIMUM CONSTRUCTION RELATED CARCINOGENIC RISK FOR OFF-SITE SENSITIVE RECEPTORS

Sensitive Receptor	Maximum Cancer Risk (# in one million)[a] without Mitigation
Off-Site Resident	8.55
Off-Site School	0.11
Maximum Individual Cancer Risk Threshold	*10*
Exceeds Threshold?	No

NOTES:
The modeled maximum cancer risk values are at the residence that borders the project on the north for residential receptors and at the Dayton Height Elementary School for student receptors.
See Appendix A for additional details and modeling data.
[a] Construction risk was calculated assuming a child is born at the beginning of construction and be exposed to all construction impacts.
SOURCE: Appendix A.

TABLE 9
MAXIMUM CONSTRUCTION RELATED CHRONIC HAZARDOUS INDEX FOR OFF-SITE SENSITIVE RECEPTORS

Sensitive Receptor	Maximum Cancer Risk (# in one million)[a] without Mitigation
Off-Site Resident	0.0198
Off-Site School	0.0002
Maximum Chronic Hazardous Index Threshold	*10*
Exceeds Threshold?	No

NOTES:
See Appendix A for additional details and modeling data.
[a] Construction risk was calculated assuming a child is born at the beginning of construction and be exposed to all construction impacts.
SOURCE: Appendix A.

Operational HRA

During long-term operations, TACs could be emitted as part of periodic maintenance operations, cleaning, painting, etc., and from periodic visits from delivery trucks and service vehicles. The project is expected to have a maximum net increase of 120 daily vehicle trips and would result in minimal TACs exposure to off-site sensitive receptors. Therefore, project operations would not include sources of substantive TAC emissions identified by the SCAQMD or CARB siting recommendations and a qualitative analysis is appropriate.

Except for the on-site fleet vehicle fueling station which generates minimal TACs emissions, the proposed project would not introduce new on-site stationary equipment. Any sizable stationary

emission sources would be subject to air permitting with the SCAQMD and their TACs impact would be minimized in accordance with SCAQMD Rule 1401 (New Source Review of Toxic Air Contaminants). Specifically, Rule 1401 requires that cancer risk shall be no greater than one in one million (1.0×10^{-6}) at any receptor location if the permitted unit is constructed without Best Available Control Technology for Toxics (TBACT), and 10 in a million if the permitted unit is constructed with TBACT; the cumulative increase in hazard index (chronic or acute) shall be no greater than 1. The CEQA significance thresholds are 10 in million for cancer risk and 1 for hazard index. Project operations do not locate high-emission land uses near sensitive receptors. As presented in Table 6, PM generated on site would be well below the SCAQMD thresholds for the nearest sensitive receptors. Thus, operational TAC impacts would be less than significant. Therefore, the proposed project would not expose surrounding sensitive receptors to TAC emissions. Impacts would be considered less than significant.

d) **Less-than-Significant Impact.** Potential activities that may emit odors during construction activities include the use of architectural coatings and solvents and the combustion of diesel fuel in on- and off-road equipment. SCAQMD Rule 1113 would limit the amount of VOCs in architectural coatings and solvents. In addition, the project would comply with the applicable provisions of the CARB Air Toxics Control Measure regarding idling limitations for diesel trucks. Further, construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of construction. Through adherence with mandatory compliance with SCAQMD Rules, no construction activities or materials are expected to create objectionable odors affecting a substantial number of people. Therefore, construction of the project would result in less-than-significant impacts.

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, refineries, landfills, dairies, and fiberglass molding. The project does not include any uses identified by SCAQMD as being associated with substantial odors. As a result, the project is not expected to discharge contaminants into the air in quantities that would cause a nuisance, injury, or annoyance to the public or property pursuant to SCAQMD Rule 402. Therefore, the project would not create adverse odors affecting a substantial number of people and impacts would be less than significant.

Cumulative Impacts

The accumulation and dispersion of air pollutant emissions within an air basin is dependent upon the size and distribution of emission sources in the region and meteorological factors such as wind, sunlight, temperature, humidity, rainfall, atmospheric pressure, and topography. The health impacts associated with exposure to criteria pollutants are evaluated by air districts on a regional level based on all sources in the region and the region's attainment of the NAAQS. The mass emissions significance thresholds used in CEQA air quality analysis are not intended to be indicative of localized human health impacts that a project may have; instead, they were tied to the region’s attainment status and are emission levels at which stationary pollution sources permitted by the air district must offset their emissions using enhanced control technology and CEQA projects must implement feasible mitigations.

There are a number of related projects in the project area that have not yet been built or are currently under construction. Since LADWP has no control over the timing or sequencing of the related projects, any quantitative analysis to ascertain daily construction emissions that assumes multiple, concurrent construction projects would be speculative. The SCAQMD recommends that project-specific construction air quality impacts be used to determine the potential cumulative impacts to regional air quality.

With regard to project operations, SCAQMD's approach for assessing cumulative impacts related to operations or long-term implementation is based on attainment of ambient air quality standards in accordance with the requirements of the federal and State Clean Air Acts. As discussed earlier, the SCAQMD AQMP addresses the region's cumulative air quality condition.

A significant impact may occur if a project would add a cumulatively considerable contribution of a federal or State non-attainment pollutant. Because the Los Angeles County portion of the Basin is currently in non-attainment for ozone, PM_{10}, and $PM_{2.5}$, related projects could 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 2012 AQMP. As previously stated, the project would comply with and incorporate measures to reduce criteria pollutant emissions during construction and operations. Also, construction jobs would be temporary and when operational, the net increase in employees for the project would be within SCAG's employment growth forecast for the City of Los Angeles.

Nonetheless, SCAQMD no longer recommends relying solely upon consistency with the AQMP as an appropriate methodology for assessing cumulative air quality impacts. The SCAQMD recommends that project-specific air quality impacts be used to determine the potential cumulative impacts to regional air quality (SCAQMD 2003).

As displayed in Table 3 and Table 4, regional emissions calculated for project construction and operations would be less than the applicable SCAQMD daily significance thresholds, which are designed to assist the region in attaining the applicable State and national ambient air quality

standards. These standards apply to both primary (criteria and precursor) and secondary pollutants (ozone). Although the project site is located in a region that is in non-attainment for ozone, PM_{10}, and $PM_{2.5}$, the emissions associated with the project would not be cumulatively considerable as the emissions would fall below SCAQMD daily significance thresholds. In addition, the project would be consistent with the AQMP, which is intended to bring the Basin into attainment for all criteria pollutants.

With respect to health impacts associated with criteria pollutants exposure, available models today are designed to determine regional, population-wide health impacts, and cannot accurately quantify project-level health impacts. Therefore, it is infeasible to further connect the project level criteria pollutants emissions to the resulting human health impact at this time. Following the SCAQMD recommendation of cumulative impact analysis, for both criterial pollutants and toxic air contaminants, project construction health risks would be less than significant and related projects would also be required to implement similarly stringent measures, as necessary under CEQA, to mitigate impacts to less than significant. Compliance with applicable SCAQMD rules would ensure project operational health risks would be less than significant and related projects would also be required to comply with applicable rules as well as implement mitigation measures, as necessary under CEQA, to mitigate impacts to less than significant. As a result, the project would not result in cumulatively considerable health impacts.

Compliance with applicable rules would ensure that the project and related projects would not result in cumulatively considerable odor impacts.

Biological Resources

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
IV. 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 Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?	☐	☐	☒	☐
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 CDFW or USFWS?	☐	☐	☐	☒
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) Less-than-Significant Impact. The project site does not contain any vegetation and, therefore, does not contain any native plant habitat or special-status plant species. The project site has been operating as an urban use for decades. The site is almost entirely paved and contains open parking areas and enclosed structures; these characteristics are not conducive to wildlife habitat. Any wildlife found on site would likely be transitory and would be a species associated with urban areas (e.g., raccoons, opossums, etc.). The site does not contain any trees; however, there are approximately five non-native southern magnolia (*Magnolia grandiflora*) street trees that line the sidewalk on North Commonwealth Avenue and seven non-native Mexican fan palm (*Washingtonia robusta)* trees along Clinton Street adjacent to the project site. The proposed project would not remove any existing trees along North Commonwealth Avenue. The proposed project would remove the seven Mexican fan palm trees along Clinton Street. The Mexican fan palm trees would be replaced with seven shade trees along Clinton Street and eight shade trees along Hoover Street., which would increase ornamental trees over existing conditions. Thus, the project would not disturb any native or protected trees or shrubs as defined by LAMC Section 17.02, and impacts to street trees would be less than significant. 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 (CDFW) or United States Fish and Wildlife Service (USFWS). Furthermore, the project site is not located in or adjacent to a Significant Ecological Area (SEA) as defined by the City of Los Angeles (County of Los Angeles 2018). As such, the project would have no impact on any riparian habitat or other sensitive natural community and no mitigation measures are required.

c) No Impact. The U.S. Army Corps of Engineers (USACE) 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. 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. There would be no impacts associated with project implementation and no mitigation measures are required.

d) Less-than-Significant Impact. As described above, the proposed project is located within a highly urbanized area and the site is currently developed. There are no potential or established resident or migratory wildlife corridors on the project site or in the vicinity 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 significantly impact 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 (MBTA) (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 (CFG) Code Sections 3500 and 3800, and thus impacts to native birds or their nests during the breeding season are potentially significant. The site does not contain any trees; however, there are approximately five non-native southern magnolia street trees that line the sidewalk on North Commonwealth Avenue and seven non-native Mexican fan palm trees along Clinton Street adjacent to the project site. The proposed project would not remove any existing trees along North Commonwealth Avenue. The proposed project would remove the seven Mexican fan palm trees along Clinton Street. The Mexican fan palm trees would be replaced with seven shade trees along Clinton Street and eight shade trees along Hoover Street. These trees could provide suitable nesting habitat for common avian species known to occur in urban environments that are protected under the MBTA. However, the project would be required to comply with the MBTA and CFG Code to ensure that significant impacts to native and migratory birds would not occur in order to reduce the potential for impacts to migratory birds. With implementation of the regulations set forth in the MBTA and CFG Code, and

replacement the Mexican fan palms with shade trees, any potential impacts to native or migratory birds would be reduced to less than significant.

e) Less-than-Significant Impact. The project site is not located within any habitat conservation plan or natural community conservation plan, and the Wilshire Community Plan Area does not contain any policies protecting biological resources. However, the City of Los Angeles Protected Tree and Shrub Ordinance (LAMC Chapter IV, Article 6) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees (*Juglans californica*), western sycamore trees (*Platanus racemosa*), California bay trees (*Laurus nobilis*), Mexican elderberry (*Sambucus mexicana*), and toyon (*Heteromeles arbutifolia*) of at least four inches in diameter at breast height. These tree and shrub species are considered "protected" by the City of Los Angeles. Native trees and shrubs that have been planted as part of a tree planting program are exempt from this Ordinance and are not considered protected. The Ordinance prohibits, without permit, the removal of any regulated protected tree or 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 four-to-one basis with trees and shrubs that are of a protected variety. The City requires that a report be prepared by a tree expert discussing the subject tree(s), their preservation, effects of proposed construction, and mitigation measures pursuant to the removal or replacement thereof. The project site does not contain locally-protected biological resources, such as oak trees, Southern California black walnut, western sycamore, California bay, Mexican elderberry, and toyon. Project implementation would not involve the removal of any protected or California native trees or shrubs, nor would it conflict with any local policies or ordinances protecting biological resources. Therefore, the proposed project would not conflict with any local policies or ordinances protecting biological resources and impacts would be less than significant.

f) No Impact. The proposed project is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan (HCP/NCCP) or other approved local, regional, or State HCPs. The project site is also not located within a SEA defined by the County of Los Angeles. (County of Los Angeles 2015a). No impact would occur.

Cultural Resources

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. 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 formal cemeteries?	☐	☒	☐	☐

Discussion

The analysis of impacts to archaeological and historic resources is based, in part, on the *Hoover Street District Yard Demolition Project, Cultural Resources Assessment Report* prepared by ESA in March 2021. The report is included as Appendix B of this Initial Study.

a) Less-than-Significant Impact with Mitigation Incorporated. Two historic-period built resources were identified within or adjacent to the project site: LADWP Hoover Street District Yard No. 2 (within) and Distributing Station No. 15 (adjacent) (ESA 2021).

The LADWP District Yard No. 2 was identified and documented during a historic architectural resources survey conducted for the project area on June 27, 2017. Originally constructed between 1925 and 1926, the District Yard is comprised of seven structures that include: Warehouse (1926), Office and Fleet Maintenance Building (1958), Office and Tool Room (1939), Fleet Maintenance Shop (1954), Truck Shed North (c. 1983–1989), Meter Truck Shed (1939), Truck Shed South (1953), and associated facilities (Wall). The seven structures are all located in the eastern half of the District Yard, while the western half of the District Yard is used as a parking lot, pole training area, and outdoor storage location. The District Yard was evaluated and found to be ineligible for listing in the National Register of Historic Places (NRHP) or the California Register of Historical Resources (CRHR) (ESA 2019), and, therefore, does not qualify as a historical resource pursuant to CEQA. As such, project impacts to the LADWP District Yard No. 2, including demolition of buildings, would not be considered significant.

The LADWP Distributing Station No. 15 was identified through a review of locally recorded historic architectural resources in the SurveyLA database. The resource is located adjacent to the project site at 604 North Commonwealth Avenue. The resource was constructed in 1926 in the Neoclassical Institutional architectural style. The function of the Distributing Station was to transfer power from a transmission station to a distribution system for a service area. Permanent stations, such as this one, were two-story, with 34.5 kV equipment on the second floor and the transformer banks and 4.8 kV equipment on the first floor. SurveyLA identified Distributing Station No. 15 as an "excellent example of a pre-World War II Department of Water and Power distribution station in the Wilshire area; reflective of the area's expanding population and increased demand for municipal services. [It] retains distinctive features of the property type and

embodies design and building standards common to LADWP buildings constructed at the time". Furthermore, it was identified as an "excellent example of Neoclassical Institutional architecture in the Wilshire area". The resource is eligible for listing in the NRHP and the CRHR under Criteria A/1 and C/3, and, therefore, qualifies as a historical resource pursuant to CEQA.

Due to the close proximity of LADWP Distributing Station No. 15 to the project, the resource could be subject to indirect visual impacts from construction of the project. However, based on guidance provided by SurveyLA, the Infrastructure-Water & Power – Receiving and Distributing Stations property type, of which Distributing Station No. 15 is an example, does not require integrity of setting in order to be considered an eligible historical resource. As such, no indirect impacts resulting from visual changes in the setting of Distributing Station No. 15 are anticipated. With regard to public views, the project would not obstruct the primary (west and south) elevations of Distributing Station No. 15, thereby preserving its historical relationship to the northeast corner of North Commonwealth Avenue and Clinton Street and, upon project completion, would remain visible from the intersection. Therefore, the project would not destroy or materially alter any character-defining features associated with Distributing Station No. 15 that contribute to its eligibility for the NRHP or CRHR, and impacts would be less than significant.

In contrast, the resource may be subject to indirect impacts associated with ground-borne vibration during project implementation. Demolition and new construction within the project area can cause vibration and noises that could harm or damage Distributing Station No. 15 and its finishes. Vibration travels through the ground spreading and hampering properties of the soil or rock. Buildings can respond to strong ground vibrations which can affect the building's foundation (footings, piles), mass and structural elements, or cause cosmetic damage (cracks on walls and breaks in concrete blocks). Furthermore, vibrations can cause minor and major damage including, but not limited to: large cracks, cracks through concrete or masonry, cracks in support columns, loosening of joints, splaying of masonry cracks. As such, project implementation could cause a substantial adverse change in the significance of a historical resource. With the incorporation of Mitigation Measure MM-CUL-1, indirect impacts to the LADWP Distributing Station No. 15 caused by project-related ground-borne vibration would be reduced to less than significant.

Mitigation Measures

MM-CUL-1: Vibration Monitoring. To avoid or minimize potential construction vibration damage to structural or finish materials on the Distributing Station No. 15, the condition of such materials shall be documented by a qualified preservation consultant, prior to initiation of construction. During construction, the contractor shall install and maintain at least two continuously operational automated vibrational monitors on the Distributing Station No. 15. The monitors must be capable of being programmed with two predetermined vibratory velocities levels: a first-level alarm equivalent to a 0.45 inch per second at the face of the building and a regulatory alarm level equivalent to 0.5 inch per second at the face of the building. The monitoring system must produce real-time specific alarms (via text message and/or email to on-site personnel) when velocities exceed either of the predetermined levels. In the event of a first-level alarm, feasible steps to reduce vibratory levels shall be undertaken, including but not limited to halting/staggering concurrent activities and utilizing lower-vibratory techniques. In the

event of an exceedance of the regulatory level, work in the vicinity shall be halted and the Distributing Station No. 15 visually inspected for damage. Furthermore, once construction has been completed, a qualified preservation consultant shall conduct a final visual inspection of the Distributing Station No. 15 to determine if any damage has occurred. Results of the inspections must be logged. In the event damage occurs to historic finish materials due to construction vibration, such materials shall be repaired in consultation with a qualified preservation consultant.

b) Less-than-Significant Impact with Mitigation Incorporated. A records search for the project was conducted on May 24, 2017 at the California Historical Resources Information System (CHRIS) South Central Coastal Information Center (SCCIC) housed at California State University Fullerton. The records search included a review of all recorded archaeological resources and previous studies within the project area and a ½-mile radius. No archaeological resources were identified within or immediately adjacent to the project area as a result of the records search, and because the project area is developed and fully paved, an archaeological resources survey was not conducted (ESA 2021). In addition, a review of geological maps and historic imagery indicates that the geologic unit within the project area was deposited prior to prehistoric human occupation and therefore is not sensitive for prehistoric archaeological resources at depth, and any surface archaeological resources would have been previously destroyed by historic development. In contrast, a historic map review indicates that residential development within the project extends back to the late 19th and early 20th centuries, and there exists the possibility that historic-period archaeological deposits associated with this residential development underlie portions of the project area (ESA 2021). The potential for subsurface historic-period archaeological resources is variable across the project area. The central and southwestern portions of the project area have a low likelihood of containing intact sub-surface archaeological deposits and/or features due to the 10-foot depths of ground disturbance associated with the construction of the Warehouse and the Troublemen's Headquarters. The northern and western portions of the project area are comprised of a series of sheds and a parking lot, respectively, and may have not been subject to the extensive degree of ground disturbance associated with the Warehouse and the Troublemen's Headquarters. As such, the northern and western portions of the project area have the potential to contain sub-surface historic-period archaeological deposits and/or features associated with the late 19th and early 20th century residential development of the project area. As such, project implementation, especially excavation associated with construction of the underground parking garage, could cause a substantial adverse change in the significance of an archaeological resource. With the incorporation of Mitigation Measures MM-CUL-2 through MM-CUL-5, impacts to archaeological resources would be reduced to less than significant.

Mitigation Measures

MM-CUL-2: Retention of a Qualified Archaeologist. 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 2008) to carry out the following cultural resources mitigation.

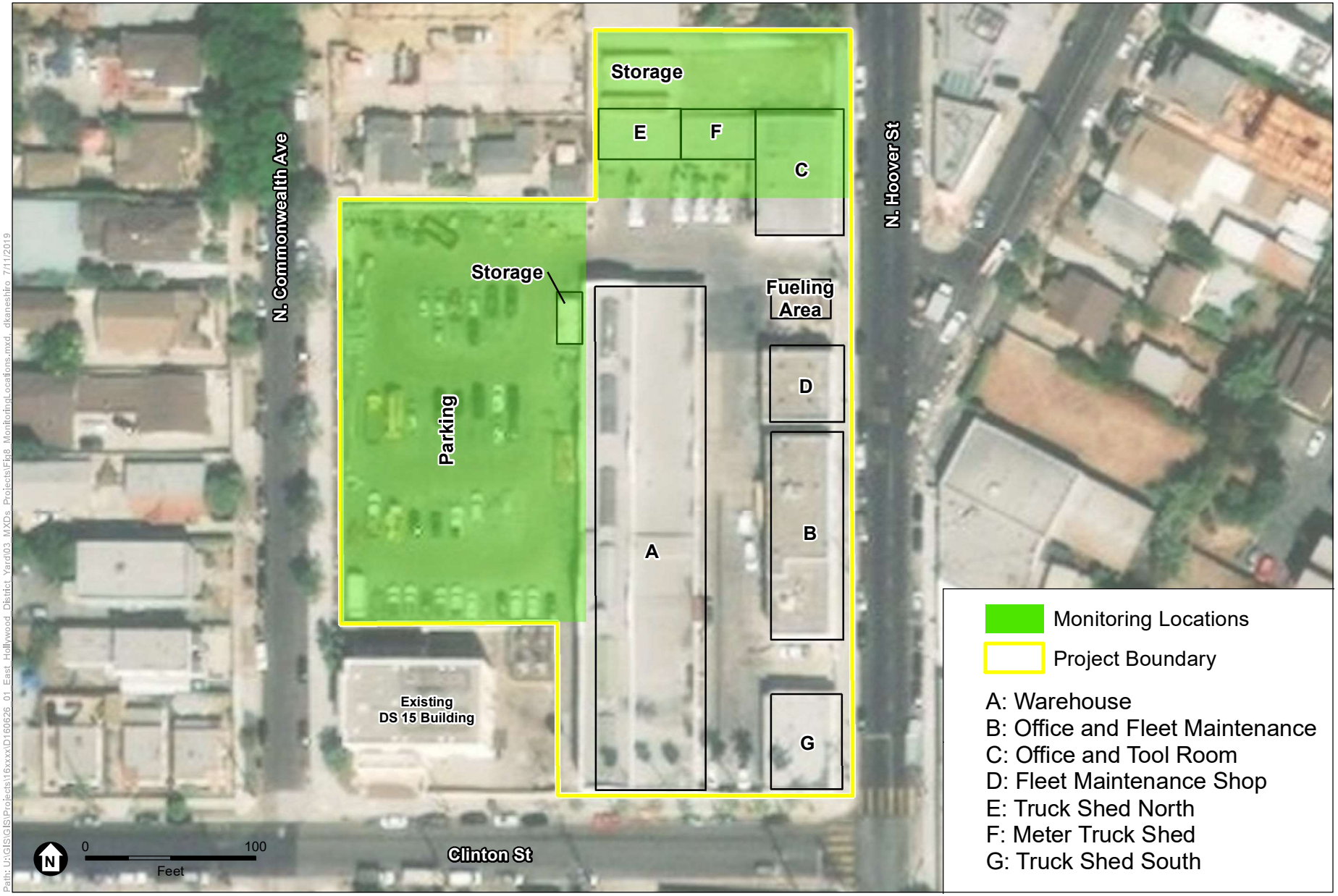
MM-CUL-3: Cultural Resources Sensitivity Training. Prior to start of ground-disturbing activities, the qualified archaeologist shall conduct cultural resources

sensitivity training for all construction personnel involved in ground disturbing activities. 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.

MM-CUL-4: Archaeological Resources Monitoring. An archaeological monitor (working under the direct supervision of the qualified archaeologist) shall observe all initial ground-disturbing activities, including but not limited to brush clearance, vegetation removal, grubbing, grading, and excavation within the western and northern portions of the project area (**Figure 10, Areas of the Project Requiring Archaeological Monitoring**). 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 area. The archaeological monitor shall have the authority to temporarily halt construction until coordination with a supervisor or foreman has occurred to re-direct work away from the vicinity of the discovery so that the qualified archaeologist can evaluate the discovery and determine appropriate treatment (as prescribed below in Mitigation Measure CUL-5). 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 within 60 days of completion of monitoring. A copy of the final report shall be filed at the South Central Coastal Information Center.

MM-CUL-5: Inadvertent Discoveries. 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.



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SOURCE: ESRI

Hoover Street District Yard Demolition and New Power District Yard Project

Figure 10
Areas of the Project Requiring Archaeological Monitoring

ESA

c) Less-than-Significant Impact with Mitigation Incorporated. No known formal or informal cemeteries or other burial places are known to exist within the project area and the proposed project is unlikely to disturb human remains. However, because the proposed project would involve earthmoving activities, it is possible that such actions could unearth, expose, or disturb previously unknown human remains. With the incorporation of Mitigation Measure MM-CUL-6, which requires compliance with State Health and Safety Code Section 7050.5 and PRC Section 5097.98, potential impacts to human remains would be less than significant.

Mitigation Measure

MM-CUL-6: Inadvertent Discovery of Human Remains. 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 Public Resources Code (PRC) Section 5097.98 and Health and Safety Code Section 7050.5. If the County Coroner determines that the remains are Native American, the California Native American Heritage Commission (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.

Energy

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. 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. With respect to construction and operational transportation energy, the proposed project would increase the demand for transportation fuel (diesel and gasoline) from construction equipment and vehicles traveling to and from the site. **Table 10, Estimated Annual Project Construction Fuel Consumption**, and **Table 11, Estimated Project Operational Transportation Fuel Usage**, show the estimated project construction and operational transportation fuel usage, both of which are minimal compared to both the Basin total and the State-wide total. Construction would be temporary and last for approximately twenty-six months. The project would require construction contractors and truck operators to comply with applicable State regulations governing heavy duty diesel on- and off-road equipment. As discussed in the *Air Quality* section above, the CARB adopted a regulation to limit heavy-duty diesel motor vehicle idling to no more than five minutes at any location. According to the CARB staff report that was prepared at the time the anti-idling ATCM was proposed for adoption in late 2004/early 2005, the regulation was estimated to reduce non-essential idling and associated emissions of diesel particulate matter and NO_X emissions by 64 and 78 percent, respectively, in analysis year 2009 (CARB 2004). These reductions in emissions are directly attributable to overall reduced idling times and reduced idling fuel combustion as a result of compliance with the regulation. Compliance with these regulations would reduce the inefficient, wasteful, and unnecessary consumption of transportation energy demand and impacts would be considered less than significant.

TABLE 10
ESTIMATED ANNUAL PROJECT CONSTRUCTION FUEL CONSUMPTION

Source	Fuel Type	Project[a] (gpy)	South Coast Air Basin 2019[b] (gpy)	Percent of South Coast Air Basin
Workers	Gasoline	7,737	4,534,884,840	0.0002
Vendors	Diesel	2,055	1,012,113,358	0.0002
Haul Trucks	Diesel	34,554	23,211,633	0.15
Off-Road Equipment	Diesel	24,740	94,283,249	0.03

NOTES:
gpy = gallons per year
[a] Project fuel consumption is based on the trip rates and distance from CalEEMod, and the fuel consumption rate (miles/gal) from EMFAC.
[b] South Coast Air Basin 2019 fuel consumption was estimated by EMFAC.
SOURCE: ESA 2021.

TABLE 11
ESTIMATED PROJECT OPERATIONAL TRANSPORTATION FUEL USAGE

Fuel Type	Gasoline Fuel (gpy)[a]	Diesel Fuel (gpy)[a]
Baseline	27,657	5,312
Project	38,186	8,487
Net Increase (Project—Baseline)	**10,529**	**3,175**
State-wide 2021 Fuel Usage [b] (Transportation Sector)	13,723,330,541	3,937,680,539
Percent of Statewide	0.00008	0.00008

NOTES:
gpy = gallons per year
[a] Baseline and project transportation fuel usage were estimated based on CALEEMOD output.
[b] California state-wide transportation fuel consumption was based on EMFAC2014 estimate for calendar year 2021.
SOURCE: ESA 2021.

LADWP and Southern California Gas Company (SoCalGas) would provide electricity for the proposed project.[5] Construction electricity was estimated for a temporary construction office, for construction equipment that would use electricity as an alternative to diesel fuel, and for water usage from dust control. The construction office was assumed to be a 1,000 square foot trailer and was modeled using CalEEMod. Electricity demand by construction equipment was estimated using default horsepower and load factors from CalEEMod and hours of operation per day provided by the Applicant. The total horsepower-hours were then converted to kilowatt-hours using a standard conversion factor. In addition, electricity from water conveyance for dust control was also calculated based on the estimated exposed area and water needs to cover the area during construction activity. Default CalEEMod water electricity intensity factors were used to convert the volume of water needed to electricity demand from water conveyance. **Table 12, Estimated Construction Energy Usage**, shows the estimated project electricity demand during construction, which would be extremely minimal with respect to LADWP supplies and would not impact the capacity of existing utility facilities.

TABLE 12
ESTIMATED PROJECT CONSTRUCTION ENERGY USAGE

Energy Type	Electricity per Year[a] (million kWh)
Construction Trailer	0.013
Construction Water	0.013
Construction Electric Equipment	0.045
Total Project Construction Electricity Demand	**0.072**
Local Utility Providers Network Sales—SoCal Gas/LADWP[b]	26,000[b]
Percent of Local Utility Providers	0.0003

NOTES:
kBtu = thousand British thermal units; kWh = kilowatt-hour
[a] Natural gas and electricity usage prediction was based on CalEEMod estimate.
[b] LADWP, 2017-2018 Briefing Book.
SOURCE: Appendix A.

5 The project buildings and facilities would be electrically-powered; therefore, the project would not use natural gas.

Table 13, Estimated Direct Project Operational Energy Usage, shows the estimated project electricity demand and net estimated project electricity demand, which would be extremely minimal with respect to SoCalGas and LADWP supplies and would not impact the capacity of existing utility facilities.[6] As the project would be electrically-powered, the project would result in a net reduction in natural gas relative to existing conditions. In addition to meeting the energy efficiency measures that are required by regulation, such as the current Title 24 standards, the CALGreen Code, and the City's Green Building Code, the project would also incorporate features that would reduce energy and water consumption by meeting and exceeding the LEED Gold level. The project would feature a 24,483 sf solar array system that would be built above the District Office building, the fueling stations, and the fleet parking that would reduce the amount of electricity demand from City utilities required for the project. Conservatively, no credit is taken for the solar array and operational energy consumption would be lower than those analyzed here due to the solar array system as electricity consumption would be reduced. As a result, the project would not result in wasteful or unnecessary consumption of energy and impacts would be considered less than significant.

TABLE 13
ESTIMATED DIRECT PROJECT OPERATIONAL ENERGY USAGE

Energy Type	Natural Gas per Year[a] (million kBtu)	Electricity per Year[a] (million kWh)
Baseline	0.26	0.30
Project	0.00	1.05
Net Increase (Project—Baseline)	**-0.26**	**0.75**
Local Utility Providers Network Sales—SoCal Gas/LADWP[b]	867,000[b]	69,029[c]
Percent of Local Utility Providers	-0.00003	0.0011

NOTES:
kBtu = thousand British thermal units; kWh = kilowatt-hour

[a] Electricity usage prediction was based on CalEEMod estimate. Operational building energy consumption estimates through CalEEMod were conservatively doubled to account for increased project land use square footages based on the newest site plans as compared to when the modeling was completed. The project will be all electric, therefore the project would not use natural gas.

[b] LADWP, 2017-2018 Briefing Book.

SOURCE: Appendix A.

b) Less-than-Significant Impact. The State of California and the City of Los Angeles have implemented energy policies relevant to this project. As discussed above, the project would require construction contractors and truck operators to comply with applicable State regulations governing heavy duty diesel on- and off-road equipment to minimize transportation fuel consumption. In addition to meeting the energy efficiency measures that are required by regulation, such as the current Title 24 standards, the CALGreen Code, and the City's Green Building Code, the project would incorporate features that would reduce energy and water consumption by meeting criteria above the LEED Gold level. Overall, the project would not conflict with applicable energy efficiency policies or standards. As such, impacts would be considered less than significant.

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[6] The project building and facilities would be all electrically-powered; therefore, the project would not use natural gas.

Geology and Soils

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
VII. 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) Less-than-Significant 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 State Geologist (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 area 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 2014). 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 Hollywood Fault, which is located approximately 3 miles north of the project site (SCEDC 2017). While movement on unknown faults is possible, such an event is unlikely given the extensive fault mapping in the region. The impacts from rupture of a known earthquake fault are considered to be less than significant.

a.ii) Less-than-Significant Impact. As stated above in 2.7(a)(i), 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 Hollywood Fault is the nearest active fault, located approximately 3 miles north 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 on which the proposed project components would be constructed. Intense groundshaking and high ground accelerations would affect the entire area around the proposed project. The primary and secondary effects of groundshaking could damage structural foundations, distort and break pipelines, and cause structural failure. Seismic shaking of the proposed facilities could place people and structures at risk.

The structural elements of the proposed project would be required to undergo appropriate design-level geotechnical evaluations prior to final design and construction. Implementing the regulatory requirements in the California Building Code (CBC), County and City ordinances (e.g., City of Los Angeles Bureau of Engineering Standard Project Specifications), and the CGS Guidelines for Evaluating and Mitigating Seismic Hazards in California (CGS 2008), and ensuring that all buildings and structures are constructed in compliance with the law is the responsibility of the project engineers and building officials. The geotechnical engineer, as a registered professional with the State of California, is required to comply with the CBC and local codes while applying standard engineering practice and the appropriate standard of care for the particular region in California, which, in the case of the proposed project, is the City and County of Los Angeles.[7] The California Professional Engineers Act (Building and Professions Code Sections 6700–6799), and the Codes of Professional Conduct, as administered by the California Board of Professional Engineers and Land Surveyors, provides the basis for regulating and enforcing engineering practice in California. The local building officials are typically with the local jurisdiction (i.e., City and County of Los Angeles) and are responsible for inspections and ensuring CBC and local code compliance prior to approval of the building permit.

Prior to the approval of construction plans for the project, LADWP would be required to complete a design-level geotechnical investigation. The geotechnical evaluation would identify soil properties needed for the development of site-specific design criteria, including the subterranean parking. The geotechnical investigation would be required to provide recommendations to protect new structures

[7] A geotechnical engineer (GE) specializes in structural behavior of soil and rocks. GEs conduct soil investigations, determine soil and rock characteristics, provide input to structural engineers, and provide recommendations to address problematic soils.

from seismic hazards to be incorporated into the proposed project final design. Recommendations may include ground stabilization, appropriate selection of foundation type and depths, and selection of appropriate structural systems. Compliance with the CBC and local ordinances would minimize the potential for damage from strong ground shaking. As a result, the proposed project would result in a less-than-significant impact with mitigation related to seismic groundshaking.

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 not 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 the California Geological Survey Seismic Hazard Zone Map (CGS 1999). 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 2016a). 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 the CGS Landslide Inventory Map (CGS 2014). Therefore, the proposed project would not expose people or structures to potential substantial adverse effects related to landslides and there would be no impact.

b) Less-than-Significant Impact. The project site is currently developed with uses that covers the majority of the site. Since there is virtually no topsoil, the potential for the loss of topsoil during construction and operation is considered negligible.

During construction, the proposed project would include the excavation of one level of subterranean parking and the export of excess soil. These types of construction activities have the potential to disturb and expose native soils to soil erosion. In addition, the change in on-site drainage patterns from project construction could also result in limited soil erosion. Thus, development of the proposed project has the potential to result in the erosion of soils during site preparation and construction activities. However, the potential for erosion during construction is limited and any potential erosion would be reduced by the implementation of stringent erosion control measures imposed by the City of Los Angeles Department of Building and Safety and the provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills. Implementation of these standards and requirements would ensure that impacts due to soil erosion or the loss of topsoil are limited. Furthermore, 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, use of bioinfiltration swales, protection of stockpiled materials, and a variety of other measures that would substantially reduce or prevent erosion from occurring during construction. Given that there is virtually no topsoil on the project site and the potential for erosion is limited, that the proposed project would implement LAMC's standards and requirements for grading and excavations during construction, and that the proposed project would adhere to the Construction General Permit, a less-than-significant impact would occur with respect to erosion or the loss of topsoil during construction.

During operation, the proposed project would not have the potential to result in substantial soil erosion or loss of topsoil, as the project site would be nearly entirely developed with buildings, a parking structure, and paved surfaces. While there would be minimal landscaping, the majority of this area would be covered with grass, trees, and shrubs that would limit the amount of topsoil that is exposed. Thus, the potential for soil erosion during operation of the proposed project is extremely low. Therefore, impacts with regard to substantial soil erosion and loss of topsoil would be considered less than significant and no mitigation measures are required.

c) Less-than-Significant Impact. Impacts related to liquefaction and landslides are addressed above in Item 2.7(a)(iii) and Item 2.7(a)(iv), respectively. As described therein, the project site is not located within an area subject to landslides or liquefaction and, thus, impacts from landslides, liquefaction, and lateral spreading (typically associated with liquefaction; USGS 2017) would be less than significant. Subsidence refers to the gradual settling or sudden sinking of the ground surface due to groundwater or oil extraction (USGS 2016b). Subsidence events in the City of Los Angeles have been associated with oil and gas extraction and mining activities but the project site is not located in a State-designated oil field or a major oil producing area (City of Los Angeles 1996). Collapses refer to mainly to sinkholes caused by dissolved rock but the project site is not located in an area with limestone, carbonate rock, salt beds, or rocks that can naturally be dissolved by groundwater circulating through them (USGS 2016c). Finally, as previously discussed in Item 2.7(a)(ii), the CBC and local ordinances would require a design-level geotechnical investigation for the project that would identify unstable geologic conditions and provide recommendations to address those conditions. With compliance with the CBC and local ordinances, impacts would be less than significant.

d) Less-than-Significant 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. However, as discussed above in Item 2.7(a)(ii), the CBC and local ordinances would require that a

geotechnical investigation be conducted to identify geotechnical issues for the project site, such as problematic soil conditions, including expansive soil. If expansive soils are identified, then the geotechnical investigation would provide recommendations such as removal, treatment with lime, and/or proper fill selection. Compliance with the CBC and local ordinances would ensure that the project components would be designed to include technical specifications to minimize impacts due to expansive soils. Therefore, impacts due to expansive soils would be less than significant.

e) No Impact. The project site is located in a highly urbanized area, where wastewater infrastructure is currently in place. The proposed project would connect to existing sewer lines that serve the project site and would not use septic tanks or alternative waste disposal systems. Therefore, no impact would occur and no mitigation measures are required.

f) Less-than-Significant Impact with Mitigation Incorporated. A geologic map review indicates that the surficial geology of the project area consists of the Puente Formation, which dates to the middle to late Miocene (13.7 to 5.5 million years ago) and is characterized by gray to light brown, thin-bedded silty clay shale deposited in a marine environment (Dibblee and Ehrenspeck 1991; Critelli et al. 1995). Geotechnical testing within the vicinity of the project area indicates the Puente Formation extends to a depth of at least 80 feet below the ground surface, which was the extent of the testing (Kleinfelder 2018).

A records search conducted by the Natural History Museum of Los Angeles County (LACM) did not identify any fossil localities in the project area; however, it did indicate the presence of a number of fossil localities identified within the Puente Formation in the project vicinity. To the west of the project, excavations associated with the MTA Metrorail Red Line recovered a large number of fish fossils from 18 families, such as lanternfish (Myctophidae), blackchins (Neoscopelidae), amberjacks (Carangidae), snake mackerels (Gempylidae), tunas (Scombridae), sea bass and groupers (Serranidae), smelts (Argentinidae), and bristlemouths (Gonostomidae) (McLeod 2017). In addition to the results of the LACM records search, the Puente Formation has been well-documented as preserving a wide range of significant fossils, such as cephalopods (Saul and Stadum 2005), crustaceans (Feldmann 2003), fishes (Carnevale et al. 2008; Huddleston and Takeuchi 2006), and other marine and terrestrial vertebrates (Barboza et al. 2017; Leatham and North 2017). Therefore, the Puente Formation is defined as having high paleontological sensitivity, as defined by the Society for Vertebrate Paleontology (2010).

Because the Puente Formation is mapped at the surface of the project to a depth of at least 80 feet, and project-related excavations would extend up to 40 feet in depth, all project-related ground disturbance into previously undisturbed sediments has the potential to impact paleontological resource (this includes ground disturbance below 10 feet in the southeastern quadrant and from existing ground surface in the remainder of the project area). As such, there exists the possibility that project implementation could destroy a unique paleontological resource or unique geologic feature. Implementation of Mitigation Measures MM-GEO-1 through MM-GEO-4 would reduce potential impacts to paleontological resources and unique geological features to less than significant.

Mitigation Measures

MM-GEO-1: Retention of a Qualified Paleontologist. Prior to the start of ground-disturbing activities, LADWP shall retain qualified paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards (SVP 2010) to carry out all paleontological resources mitigation.

MM-GEO-2: Paleontological Resources Sensitivity Training. Prior to the start of ground-disturbing activities and in conjunction with the Cultural Resources Sensitivity Training described above in Mitigation Measure MM-CUL-2, the qualified paleontologist shall conduct paleontological resources sensitivity training for construction personnel involved with ground-disturbing activities. The training shall focus on the recognition of the types of paleontological resources that may be encountered within the project area and the procedures to be followed if they are found. LADWP shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.

MM-GEO-3: Paleontological Monitoring. Full-time paleontological resources monitoring shall be conducted for all ground disturbing activities in sediments that have not been previously disturbed. The qualified paleontologist, in coordination with LADWP, may reduce or discontinue monitoring if it is determined that the possibility of encountering buried paleontological deposits is low based on observations of soil stratigraphy or other factors. These areas include from the existing ground surface to the maximum depth of excavation in the western and northern portions of the project area and from 10 feet below existing ground surface to the maximum depth of excavation in the southeastern quadrant. Paleontological resources monitoring shall be performed by a qualified paleontological monitor (or cross-trained archaeological/paleontological monitor) under the direction of the qualified paleontologist. Monitors shall have the authority to temporarily halt or divert work away from exposed fossils until coordination with a supervisor or foreman has occurred, in a radius of at least 50 feet, in order to recover the fossil specimens. Any significant fossils collected during project-related excavations shall be prepared to the point of identification and curated into an accredited repository with retrievable storage. Monitors shall prepare daily logs detailing the types of activities and soils observed, and any discoveries. The qualified paleontologist shall prepare a final monitoring and mitigation report to be submitted to LADWP within 60 days of completion of monitoring.

MM-GEO-4: Inadvertent Discoveries of Paleontological Resources. If construction or other project personnel discover any potential fossils during construction, regardless of whether a monitor is present or the depth of work or location, all work within 50 feet of the discovery shall cease until the qualified paleontologist has assessed the discovery and made recommendations as to the appropriate treatment. If the find is deemed significant, it shall be prepared to the point of identification and curated into an accredited repository with retrievable storage.

Greenhouse Gas Emissions

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
VIII. 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. Gases that trap heat in the atmosphere are called GHGs. The primary negative effect of GHGs is that increases in their concentrations are causing global climate change. Global climate change is a change in the average weather on Earth that can be measured by wind patterns, storms, precipitation, and temperature. Although there is disagreement as to the rate of global climate change and the extent of the impacts attributable to human activities, most in the scientific community agree that there is a direct link between increased emissions of GHGs and long-term global temperature increases.

The State defines GHGs as 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, one metric ton (MT) of CH_4 is equivalent to 25 MT of CO_2 equivalents ($MTCO_2e$). The State uses the GWP ratios available from the United Nations Intergovernmental Panel on Climate Change (IPCC) and published in the *Fourth Assessment Report* (AR4).[8] By applying the GWP ratios, project-related CO_2e emissions can be tabulated in MT per year. Large emission sources are reported in million metric tons (MMT) of CO_2e.[9]

Some of the potential effects in California of global warming may include loss of snow pack, sea level rise, more extreme heat days per year, more high ozone days, more forest fires, and more drought years (CARB 2008). Globally, climate change has the potential to impact numerous environmental resources through potential, though uncertain, impacts related to future air temperatures and precipitation patterns.

The projected effects of global warming on weather and climate are likely to vary regionally, but are expected to include the following direct effects (IPCC 2001):

- Higher maximum temperatures and more hot days over nearly all land areas;
- Higher minimum temperatures, fewer cold days and frost days over nearly all land areas;

8 https://www.arb.ca.gov/cc/inventory/background/gwp.htm

9 A metric ton is 1,000 kilograms; it is equal to approximately 1.1 U.S. tons and approximately 2,204.6 pounds.

- Reduced diurnal temperature range over most land areas;
- Increase of heat index over land areas; and
- More intense precipitation events.

Also, there are many secondary effects projected to result from global warming, including global rise in sea level, impacts to agriculture, changes in disease vectors, and changes in habitat and biodiversity. While the possible outcomes and the feedback mechanisms involved are not fully understood and much research remains to be done, the potential for substantial environmental, social, and economic consequences over the long term may be great.

California generated 425 $MMTCO_2e$ in 2018. Combustion of fossil fuel in the transportation sector was the single largest source of California's GHG emissions in 2018, accounting for approximately 40 percent of total GHG emissions in the State. This sector was followed by the industrial sector (21 percent) and the electric power sector (including both in-State and out-of-State sources) (15 percent) (CARB 2021).

Impacts of GHGs are borne globally, unlike localized air quality effects of criteria air pollutants and toxic air contaminants. 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.

The City of Los Angeles has not adopted a threshold of significance for GHG emissions that would be applicable to this project. 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. The most recent proposal issued in September 2010 recommend a single numerical screening threshold of 3,000 $MTCO_2e$ per year for all non-industrial projects (SCAQMD 2010). Although SCAQMD has not formally adopted a significance threshold for GHG emissions generated by a proposed 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 accepted standards, the SCAQMD's proposed significance threshold of 3,000 $MTCO_2e$ per year is used as a benchmark for the proposed project. It should be noted that the SCAQMD's significance threshold is intended to account for long-term operational GHG emissions. The SCAQMD has developed guidance for determining of the significance of GHG construction emissions that recommends that total emissions from construction be amortized over an assumed project's lifetime of 30 years and added to operational emissions and then compared to the threshold. The latest version of CalEEMod (Version 2016.3.2) has been used for this project to estimate the project's GHG emissions.

Emissions

Construction activities associated with the project 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 described in Air Quality section above. Following SCAQMD methodology, construction emissions were amortized over a 30-year period and included in the project's annual operational-phase GHG emissions.

Operational activities associated with the project would result in emissions of CO_2 and to a lesser extent CH_4 and N_2O. Operational sources of GHG emissions would include mobile sources from vehicles traveling to and from the site. A maximum increase of 120 vehicle trips is expected for this project. Emissions of GHGs would also result from electricity demand to power the on-site equipment and lighting. Electricity-related GHG emissions are based on the maximum electricity demand for project equipment, assuming maximum operating loads and equipment running hours, and CO_2 intensity factors for LADWP.

The project would feature a 24,483 sf solar array system that would be built above the surface parking lot that would reduce the amount of electricity demand from City utilities required for the project and associated GHG emissions. Conservatively, no credit is taken for the solar array and operational GHG emissions would be lower than those analyzed here due to the solar array system as electricity consumption and associated GHG emissions would be reduced.

The annual GHG emissions for the project were summarized in **Table 14, Estimated Project Annual Greenhouse Gas Emissions (Build-Out Year 2023)**. As shown, project GHG emissions are below the draft SCAQMD significance threshold for non-industrial development, and therefore would result in a less-than-significant impact. Note that mobile emissions calculations from EMFAC conservatively assume diesel and gasoline fuel usage. According to the U.S. Department of Energy, natural gas emits approximately 6 to 11 percent lower levels of GHGs than gasoline throughout the fuel life cycle (U.S. Department of Energy 2017). Therefore, actual GHG emissions may be lower than the values summarized in Table 14.

TABLE 14
ESTIMATED PROJECT ANNUAL GREENHOUSE GAS EMISSIONS (BUILD-OUT YEAR 2023)

Emissions Source	Existing Site CO_2e (metric tons)[a]	Project CO_2e (metric tons)[a]
Area	<1	<1
Electricity	113	800
Natural Gas	14	0
Mobile	278	398
Waste	5	53
Water	<1	28
Amortized construction emissions	—	95
Total Emissions	**411**	**1,374**
Net Project Emissions		**963**
SCAQMD Draft Significance Threshold (Non-industrial)		*3,000*
Exceeds Threshold?		No

[a] Operational area and energy emission estimates through CalEEMod were conservatively doubled to account for increased project land use square footages based on the newest site plans as compared to when the modeling was completed. The project building and facilities would be electrically-powered; therefore, emissions associated with natural gas combustion (on-site natural gas consumption for heating, such as natural gas combustion in boilers and water heaters) would not occur.

SOURCE: ESA, 2021

b) Less-than-Significant Impact. Although the City's General Plan does not identify specific GHG or climate change policies or goals, the City's Sustainable City pLAn (pLAn) sets the goals of reducing GHG emissions by 35 percent by 2025 and by 55 percent by 2035 from a 2008 baseline. Relevant GHG reduction and energy efficiency measures mentioned in the pLAn include the green building requirements imposed by the City's Green Building Code (for example, new construction shall be LEED Gold or better). The project would comply with all applicable city codes, and incorporate project design features that reduce energy and water consumption by meeting criteria above the LEED Gold level (see LEED checklist in Appendix A for detail).

With respect to relevant statewide GHG reduction strategies, the project would be consistent with the State's strategies in the Climate Change Scoping Plan to reduce GHG emissions. The project would support alternative transportation and reducing VMT growth given its location at an infill site close to existing public transportation. The project would be designed to meet criteria of the LEED Gold level which includes features to increase the project's energy efficiency. As a result, the project would not conflict with applicable Climate Change Scoping Plan strategies and regulations to reduce GHG emissions.

Overall, as the project would be consistent with the City's and State's plans and regulations and would not conflict with an applicable plan, policy, or regulation to reduce GHG emissions. As such, impacts would be less than significant.

Cumulative Impacts

It is global GHG emissions in their aggregate that contribute to climate change, not any single source of GHG emissions alone. The GHG emissions of the project alone are not expected to cause a direct physical change in the environment. Given that the project would not generate GHG emissions that may have, either directly or indirectly, a significant impact on the environment and would not conflict with applicable GHG reduction plans and policies, and given that GHG emission impacts are cumulative in nature, the project's incremental contribution to cumulatively significant GHG emissions would be less than cumulatively considerable, and impacts would be less than significant.

Hazards and Hazardous Materials

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
IX. 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. Demolition, construction, and operation activities of the proposed project would require the transportation, storage, and use of fuel and oil, sealants and glues, paints and thinners, solvents and cleaners, and other materials that can be hazardous to people or the environment. The former gasoline and diesel underground storage tanks would be replaced at the same location with an aboveground equipment fueling pad with three above-ground fuel storage tanks (ASTs) for gasoline and diesel. New tanks for both gasoline and diesel fueling will be placed in new locations within the underground garage structure in separate concrete structured vaults. Both vaults will be physically separated from each other and from the underground parking area by code regulated concrete fire walls. Access to both fueling vaults will be accessed from above at grade, within the yard. The demolition of certain structures would require the removal of asbestos-containing materials (ACM) and possibly other hazardous building materials such as lead-based paint (LBP), polychlorinated biphenyls (PCBs) in older fluorescent light ballasts, and/or mercury in fluorescent light tubes. During demolition, construction, and operations activities, construction workers, operations workers, the nearby public, or the environment could be exposed to these hazardous materials through routine use or accidental spills.

Hazardous Building Materials

The existing site buildings proposed for demolition were surveyed for the presence of ACM (LA Testing 2017). ACM were found in various building materials in the communications building, main office, warehouse, warehouse office, elevator room warehouse, paint room repair shop, and carport. Details of sketches of the buildings with sample locations, and the laboratory analytical results are provided in Appendix C1. The removal of ACM 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 ACM. 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. With compliance with this existing regulation, the impact relative to ACM would be less than significant.

In the case of ACM and LBP, the identification, removal, and disposal is regulated under CCR Title 8, Division 1, Chapter 4, Article 4, Sections 1529 and 5208, for ACM and under CCR Title 8, Division 1, Chapter 4, Article 4, Section 1532.1 for LBP. All work must be conducted by a State-certified professional which would ensure compliance with all applicable regulations. If ACM and/or LBP are determined to exist on site, which in the case of ACM has been confirmed, 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.

In the case of PCBs, the identification, removal, and disposal is regulated under the Resource Conservation and Recovery Act (RCRA) (4 Code of Federal Regulations [CFR] 7610, TSCA (15 USC 2695) and California regulations (California Code of Regulations [CCR] Title 22, Division 4.5, Chapter 11, Article 3, Section 66261.24). Electrical transformers and older fluorescent light ballasts not previously tested and verified to not contain PCBs must be tested. If PCBs are detected above action levels, the materials must be disposed of at a licensed facility permitted to accept the materials.

In the case of mercury in fluorescent light tubes and switches, the identification, removal, and disposal is regulated under CCR Title 22, Division 4.5, Chapter 42, Sections 67426.1 to 67428.1, and CCR Title 22, Division 4.5, Chapter 11, Article 4.1, Section 66261.50. Under these regulations, the light tubes must be removed without breakage and disposed of at a licensed facility permitted to accept the materials.

Use of Hazardous Materials during Demolition, Construction, and Operations

The use of hazardous materials during construction and operation would be subject to numerous federal, State, and local health and safety requirements for handling, storage, and disposal. These requirements would include the preparation and implementation of hazardous materials business plans (HMBPs) by both the construction contractors constructing the project and LADWP Environmental Affairs Division for operation of the Hoover Street District Yard. The HMBPs would be submitted to the local Certified Unified Program Agency (CUPA), which in this location would be the Los Angeles Fire Department (LAFD). The HMBPs would describe the hazardous materials to be used; procedures for transportation, storage, use, and disposal; security measures and secondary containment; and emergency response procedures describing their preparations for and actions in an emergency. In addition, the California Fire Code would also require measures for the safe storage and handling of hazardous materials. With compliance with existing regulations, impacts associated with the transportation, storage, use, and disposal of hazardous materials would result in a less-than-significant impact.

Replacement of Fuel Tanks

The replacement and operation of the fuel tanks would be subject to numerous federal, State, and local health and safety requirements. The replacement and operation of the fuel tanks would be regulated by the local CUPA, which in this location would be the LAFD. The installation and operation of the proposed ASTs would each require permits. The tank pad for the new ASTs would be required to have secondary containment. The ASTs would be required to be periodically pressure-tested to verify tightness. As a part of the operations, the monitoring of the ASTs would be required as part of the previously described HMBP. The proposed ASTs for gasoline and diesel would be required to comply with federal, State, and local AST regulations describing the construction of ASTs and associated piping, the required volumes of secondary containment structures, and emergency response procedures, all of which would also require review and approval by the LAFD. The California Fire Code would also require measures for the safe storage and handling of hazardous materials. With compliance with existing regulations, impacts associated with the transportation, storage, use, and disposal of hazardous materials would result in a less-than-significant impact.

Replacement of Monitoring Wells

The proper abandonment of existing onsite monitoring wells could result in contaminated groundwater being pumped to the ground surface as the groundwater in the existing wells is replaced with grout. The installation of replacement wells, if any, would result in the generation of contaminated soil and groundwater. The abandonment and replacement of existing onsite monitoring wells would be subject to State and local permitting, and health and safety requirements. The grouting of the existing wells and their replacement with new wells would be regulated by both the County of Los Angeles Department of Public Health (permits for well destruction and construction) and the RWQCB (work plan for the replacement of the monitoring well network). The well abandonment and construction would be required to acquire permits from and comply with the County of Los Angeles well requirements (County of Los Angeles

2018). In addition, the contaminated groundwater beneath the parcels is being investigated under the regulatory jurisdiction of the RWQCB, which will require a work plan describing the replacement of the monitoring network. The permits and work plan would require the abandonment of the existing wells and the installation of the replacement wells be conducted in such a manner to control soil and fluids produced from these activities. Contaminated soil and groundwater would be required to be contained and transported to an off-site recycling or disposal facility permitted to accept the waste per federal (Resource Conservation and Recovery Act of 1976 [RCRA], Hazardous and Solid Waste Act) and state (Hazardous Waste Control Act, Unified Hazardous Waste and Hazardous Materials Management Regulatory Program) hazardous waste laws. With compliance with the required permits, work plan, and existing hazardous waste laws, impacts associated with the well abandonment and replacement would result in a less-than-significant impact.

c) Less-than-Significant Impact. The proposed project is located within 0.25 mile of two existing or proposed schools: Dayton Heights Elementary (607 North Westmoreland Avenue, Los Angeles, CA 90004) is located approximately 0.25 mile west, and Hilltop Nursery School (3625 Marathon Street, Los Angeles, CA 90026) is located approximately 0.25 mile northeast of the project site. Although these two school facilities are located 0.25 mile from the project site and, therefore, could be directly impacted by project-related construction emissions, the schools are not located along the construction haul route. The transportation route for construction activities would be North Hoover Street south to US-101 (refer to the *Transportation and Traffic* section below); therefore, schools would not be impacted by hauling of hazardous materials. Operation of the proposed project would not require emission of hazardous materials outside of the project site. The proposed project would not impact an existing or proposed school with the emissions or handling of hazardous or acutely hazardous materials, substances, or waste, and as a result the impact would be less than significant.

d) Less-than-Significant Impact with Mitigation Incorporated. The project site is listed on the SWRCB GeoTracker website as the LADWP Streetlight Maintenance Headquarters with the following three listings: (1) an active underground storage tank permit, (2) a cancelled Waste Discharge Requirements permit for a previous groundwater treatment injection event, and (3) a completed leaking underground storage tank (LUST) cleanup action closed in 1998. Groundwater at the project site is sampled under a semi annual groundwater monitoring program). The extent of PCE in groundwater beneath the project site is shown on **Figure 7, Proposed Data Gap Work Plan Activities**. In addition, the degradation byproducts of PCE (i.e., TCE and other chlorinated chemicals) have also been detected in groundwater, collectively referred to as chlorinated VOCs. In addition, a former dry cleaning facility is located immediately northeast of the project site and is listed on the GeoTracker website as a cleanup site. Dry cleaning solvents (PCE and its degradation chlorinated byproducts including TCE) are known to have been released from the dry cleaners site to soil and groundwater, and groundwater is known to migrate from the dry cleaners site to beneath the project site, as shown on **Figure 7, Proposed Data Gap Work Plan Activities.**

During the excavation activities for the subterranean parking garage, excavation may extend as much as 50 feet bgs. The depth to groundwater as measured from January of 2016 through January

2018 ranged from 9.10 to 25.70 feet bgs for on-site monitoring wells screened in the shallow groundwater zone (Kleinfelder 2018). Therefore, depending upon the time of year the subterranean garage is excavated and the volume of winter season rainfall that precedes the excavation activities, the parking garage excavation may need to be dewatered during construction. Because soil and groundwater beneath the project site have been impacted by chlorinated VOCs, excavation activities are expected to encounter contaminated soil and dewatering activities are expected to encounter contaminated groundwater in the areas in and around the locations shown in the latest groundwater monitoring report.

To reduce the impacts to less than significant, the RAP described above in Section 1.4, *Project Overview*, and provided in Appendix C, would be implemented as part of the project to remediate the chlorinated VOCs. In addition, Mitigation Measures MM-HAZ-1 and MM-HAZ-2 shall require the LADWP or its designee (e.g., the excavation contactor) to prepare and implement a soil and groundwater management plan (SGMP) and a health and safety plan (HASP) in accordance with existing regulations. With the implementation of Mitigation Measures MM-HAZ-1 and MM-HAZ-2, the impacts would be reduced to less than significant.

Mitigation Measures

MM-HAZ-1: Soil and Groundwater Management Plan. LADWP or its designee (e.g., the excavation contractor) shall prepare and implement a Soil and Groundwater Management Plan (SGMP) in accordance with existing regulations. The SGMP shall describe the nature and extent of contaminants based on the most recent groundwater monitoring report, the real-time monitoring to be conducted that will define the levels of personal protective equipment, equipment and vehicles to be used to excavate soil, pump groundwater, and transport the contaminated materials, measures to ensure no leakage of contaminated materials during transport, decontamination procedures for personal and equipment, and the designated disposal facilities permitted to accept the contaminated materials. The contaminated groundwater generated from dewatering activities would need to be tested to determine contamination levels and then discharged appropriately as follows: 1) If acceptable levels are indicated discharge to the sanitary sewer under the requirements of the Los Angeles Municipal Code Section 64.30, 2) Onsite treatment and disposal to the storm drain under an NPDES Construction Dewatering discharge permit or 3) Transportation to an off-site hazardous waste facility licensed to handle the waste if treatment cannot be accomplished onsite.

MM-HAZ-2: Health and Safety Plan. LADWP or its designee (e.g., the excavation contractor) shall prepare and implement a Health and Safety Plan (HASP) in accordance with existing regulations. The SGMP shall describe the nature and extent of contaminants based on the most recent groundwater monitoring report, training requirements (at a minimum, on-site workers that would handle or be exposed to hazardous materials must be trained in hazardous materials waste operations [Hazwoper] as promulgated in 29 CFR 1910), personal protective equipment and the real-time monitoring to be conducted that will define the levels of personal protective equipment, and decontamination procedures for personal and equipment.

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 Bob Hope Airport located at 2627 North Hollywood Way in the City of Burbank approximately 13 miles north of the project site. Therefore, no airport-related hazardous impacts would occur.

f) No Impact. The sections of North Hoover Street, Clinton Street, and North Commonwealth 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). Therefore, the construction activities and operations would not interfere with emergency access routes or evacuation plans and there would be no impact.

g) No Impact. According to the California Department of Forestry and Fire Protection (CAL FIRE), the project site is not located within a Very High Fire Hazard Severity Zone (CAL FIRE 2011). This is because the project site is located in an urbanized environment with no potential for wildland fires. 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). Therefore, the proposed project is not anticipated to impact people or structures from wildland fires, and no impact would occur.

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 imperious 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 with Mitigation Incorporated. The proposed project would involve the demolition and removal of existing structures, and the construction of a new District Office building, SCS warehouse, Fleet Maintenance facility, and subterranean and surface-level parking. If not properly contained during demolition and construction, loose pavement, sediment, and/or chemicals would have the potential to wash into nearby storm drains and degrade water quality.

As previously discussed in Item 2.7(b), because the overall footprint of construction activities would exceed 1 acre, the proposed project would be required to comply with the State Construction General Permit (Order 2009-0009-DWQ, NPDES No. CAS000002; as amended by Orders 2010-0014-DWQ and 2012-006-DWQ) (Construction General Permit), along with the City of Los Angeles Department of Building and Safety and the provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills. Implementation of these standards and requirements would ensure that impacts due to soil erosion or the loss of topsoil are limited. The BMPs to control runoff from the construction work site include measures

to protect water quality, such as proper storage of chemicals, and preventing sediment runoff from excavation activities and soil stockpiles. The applicable erosion control ordinances require preparation of an erosion control plan prior to issuance of building permits. With compliance with these existing regulations, impacts to water quality during construction activities would be less than significant.

As previously discussed in Item 2.9(d), construction activities on the project site are anticipated to encounter contaminated groundwater during dewatering activities. To reduce the impacts to less than significant, the project includes the implementation of the previously described RAP to remediate the chlorinated VOCs. In addition, Mitigation Measures MM-HAZ-1 and MM-HAZ-2 would require LADWP or its designee (e.g., the excavation contactor) to prepare and implement a SGMP and a HASP in accordance with existing regulations, and as described in Item 2.9(d). Included in the groundwater management plan will be obtaining the NPDES dewatering permit for VOC and fuel contaminated water. With the implementation of Mitigation Measures MM-HAZ-1 and MM-HAZ-2, the impacts would be reduced to less than significant.

As previously discussed in Item 2.9(a) and Item 2.7(b), contractors would be required to prepare and implement HMBPs that would include procedures for storing hazardous materials and response procedures in the event of a spill. With the preparation and implementation of HMBPs, impacts to water quality related to the use of chemicals would be less than significant.

Operations of the new facility would include the use of hazardous materials for transmission line maintenance (e.g., cleaning solvents, paints and thinners) and fuel for vehicles (gasoline and diesel in ASTs). Impacts from the use of hazardous materials are addressed in Item 2.9(a) and Item 2.9(b), which discuss that the preparation and implementation of an HMBP would reduce impacts to less than significant. Wastewater during operations would be discharged to the existing sewer system as discussed in Item 2.7(e), resulting in no impact.

Based on these discussions, overall impacts relative to water quality would be less than significant with implementation of mitigation measures.

Mitigation Measures

Refer to MM HAZ-1 and MM HAZ-2.

b) Less-than-Significant Impact. During the excavation activities for the subterranean parking structure, excavation would begin 4 feet below the entrance at Clinton Street and would extend into the site toward the North Property Line. Maximum depth of excavation would occur along the North Property Line and would extend approximately 50 feet bgs. The depth to groundwater as measured during the third quarter 2020 groundwater monitoring event ranged from 11.6 to 19.5 feet below the ground surface for on-site monitoring wells screened in the shallow groundwater zone (Tetra Tech 2020). Therefore, depending upon the time of year the subterranean garage is excavated and the volume of winter season rainfall that precedes the excavation activities, the parking garage excavation may need to be dewatered during construction. As previously discussed in Mitigation Measure MM-HAZ-1 in Item 2.9(d), LADWP or its designee (e.g., the construction contractor) would prepare and implement a SGMP

that would include describing the procedures to manage contaminated groundwater. The volume of groundwater that would be produced during dewatering would depend on the depth of groundwater encountered, the duration of construction activities, and the rate at which the excavation refills with groundwater.

Because the dewatering activities would be temporary and short term, the volume of groundwater that would be removed would be relatively small. The project site is within an established urban community that is serviced by the LADWP and the project does not propose to use groundwater. Municipal water supply does not use shallow groundwater to avoid potential contamination from overlying land uses. Therefore, the proposed district yard improvements would not deplete groundwater supplies or interfere substantially with groundwater recharge, resulting in a less-than-significant impact.

c.i, ii) Less-than-Significant Impact. The entire project site is currently covered with hardscape that currently drains into the existing storm drain system. The demolition of existing buildings and replacement with new buildings, including the subterranean parking, would not alter the drainage pattern of the site as it currently exists. Once constructed, the area would be paved, which would prevent erosion and maintain existing runoff conditions. Flood management would be built into the lower level of the parking structure that would consist either of sealing off the lower parking level from seepage or installing drainage pumps that would seasonally pump water when groundwater levels seasonally rise above the lower parking garage level floor. In the event that groundwater is seasonally pumped from the subterranean parking garage, that water would likely require treatment prior to discharge due to the contaminated groundwater conditions previously discussed in Item 2.9(d). The treatment and discharge would require a National Pollutant Discharge Elimination Permit (NPDES) permit from the RWQCB. Once treated to the levels required by the NPDES permit, the water could then be discharged to the existing storm drain. The other option would be to discharge to the sanitary sewer with an Industrial Waste Permit (IWP) that is issued by the Bureau of Sanitation. The relatively small volume of seasonally treated water would be handled by the existing storm drain or sanitary sewer system. Therefore, drainage for the site would continue to be serviced by the existing storm drain system and/or possibly the sanitary sewer system, and flood management would be built into the subterranean parking design. Additionally, no stream or river courses exist within the site vicinity that could be affected by the proposed action. Therefore, impacts on existing drainage patterns associated with erosion, siltation, and flooding would be less than significant.

c.iii) Less-than-Significant Impact. The proposed project would not involve a change in surface area; therefore, there would be no change in the volume of surface runoff from existing conditions. As discussed in Item 2.10(c)(i), Item 2.10(c)(ii), and Item 2.7(d), if groundwater is generated by the seasonal pumping of the water from the subterranean level of the parking garage, that water would be required to be treated under a NPDES permit or IWP and discharged to either the existing storm drain or sanitary sewer system. The volume of water generated during the seasonal pumping would be short term and relatively small and would not exceed the volume of the existing storm drain or sanitary sewer system. In addition, the groundwater would be required to be treated and would therefore not generate polluted runoff. As a result, the proposed

project would not create or contribute to polluted runoff water or runoff that would exceed the existing drainage capacity of the project area, and impacts would be less than significant.

c.iv) No Impact. The proposed project is not located within a 100-year or 500-year flood hazard area and would not include the construction of structures that would impede or redirect flood flows (City of Los Angeles 1996, Exhibit F). Therefore, no impact would occur.

d) No Impact. As discussed above in Item 2.10 (c)(iv), the project site is not located within a flood hazard zone. Tsunamis are usually caused by displacement of the ocean floor causing large waves and are typically generated by seismic activity. The project site is located approximately 12.75 miles from the Pacific Ocean, therefore a tsunami hazard is not present for project site. A seiche is a standing wave in an enclosed or partly enclosed body of water. Seiches are normally caused by earthquake activity, and can affect harbors, bays, lakes, rivers, and canals. The Hollywood and Silver Lake Reservoirs are located approximately 3.5 miles northwest and 1.5 miles northeast of the project site, respectively, which would be too far to be impacted by a seiche event at either reservoir. Therefore, no impact related to seiches or tsunamis would occur.

e) **No Impact.** Relative to a sustainable groundwater management plan, the project site is not located within a medium or high priority groundwater basin and would not be required by the California Department of Water Resources (DWR) to prepare a groundwater sustainability plan (DWR 2019).

As discussed above in Impact 2.9 (d), groundwater beneath the project site is contaminated with solvents from the nearby former dry cleaning facility. This contamination would conflict with the regional water quality control plan (Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties or Basin Plan) and its goals of protecting and maintaining water quality. However, during construction, the contaminated groundwater would be removed and treated. The removal and treatment or proper disposal of this contaminated water would incrementally improve groundwater quality. During operation, occasional seasonal dewatering may occur to prevent flooding of the subsurface parking garage, depending on whether groundwater seepage into the subsurface parking garage is preventing by a sump pump or is waterproofed. Similar to the construction dewatering, the removal and treatment or proper disposal of this contaminated water would incrementally improve groundwater quality. The treatment of contaminated groundwater would be a beneficial impact.

Land Use and Planning

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. 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) Less-than-Significant Impact. The proposed project would demolish the existing LADWP Streetlight Facility and would construct an operational LADWP District Yard, including a District Office building, SCS warehouse, Fleet Maintenance facility, and parking facilities. Thus, the proposed project would replace a public facility with another public facility and would not divide an established community. Impacts would be less than significant.

b) No Impact. The project site has a General Plan land use designation of Public Facilities and a zoning designation of PF-1XL. Although the PF-1XL zoning designation does not allow for building height's greater than 35 feet, construction of the proposed project is exempt from the zoning requirements set forth for the project site. The project is defined as a "power asset" under Charter Section 672(b) of the Los Angeles Municipal Code (LAMC), which encompasses all the electric energy rights, lands, right-of-way, sites, facilities, and property used for generation, distribution, transportation, and delivery of power for the benefit of the City, its inhabitants, and its customers. As such, the City's Power Assets are under control of the Board of LADWP Commissioners (the Board), and subject to oversight by the Los Angeles City Council under Charter Section 245 of the LAMC. Specifically, the Board has "the power and duty to make and enforce all necessary rules and regulations governing the construction, maintenance, operation, connection to and use of the Water and Power Assets for (LADWP) Purposes." Therefore, the project's proposed height is not in conflict with the LAMC.

Thus, there would be no change in land use and no environmental impacts related to conflicts with applicable land use plans, policies, or regulations related to avoiding or mitigating an environmental effect would occur.

Mineral Resources

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
XII. 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. The project site is located in the City of Los Angeles in an urbanized area, on a developed parcel with surrounding residential, institutional, and commercial uses. According to the County of Los Angeles General Plan, Special Management Areas map, (which maps resources throughout the County, including the City of Los Angeles), the project site is not located in a Mineral Resource Zone (County of Los Angeles 1980). According to California Department of Conservation, Geologic Energy Management Division (CalGEM) information, there are no oil wells that exist on the project site (CalGEM 2021). 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 located in a highly urbanized area. It is not used for mineral extraction and is not known as a locally important mineral resource recovery site. Further, the project area is not delineated on any plan for mineral resource recovery uses, and no impact would occur.

Noise

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
XIII. 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 Incorporated. The City of Los Angeles has established policies and regulations concerning the generation and control of noise that could adversely affect its citizens and noise sensitive land uses. Section 41.40 (Noise Due to Construction, Excavation Work—When Prohibited) of the LAMC indicates that no construction or repair work shall be performed 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, since such activities would generate loud noises and disturb persons occupying sleeping quarters in any adjacent dwelling, hotel, apartment or other place of residence. No person, other than an individual home owner engaged in the repair or construction of his/her single-family dwelling, shall perform any construction or repair work of any kind or perform such work within 500 feet of land so occupied before 8:00 a.m. or after 6:00 p.m. on any Saturday or on a federal holiday, nor at any time on any Sunday. Under certain conditions, the City may grant a waiver to allow limited construction activities to occur outside of the limits described above.

LAMC Section 112.05 (Maximum Noise Level of Powered Equipment or Powered Hand Tools) also specifies the maximum noise level of powered equipment or powered hand tools. Any powered equipment or hand tool that produces a maximum noise level exceeding 75 dBA at a distance of 50 feet from the equipment is prohibited. However, this noise limitation does not apply where compliance is technically infeasible. Technically infeasible means the above noise limitation cannot be met despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of equipment.

Construction of the proposed project would include the use of air compressors, concrete saws, a crane, an excavator, a paver and paving equipment, a roller, a loader and a dozer, a tractor, a backhoe, and other varied construction equipment. Construction activities would occur between the LAMC Section 41.40 allowable hours of 7:00 a.m. to 9:00 p.m., Monday through Friday. No nighttime construction would occur, and no construction would occur on Sundays or federal holidays. Some construction activities may take place on Saturdays between the hours of 8:00

a.m. and 3:00 p.m. Existing single- and multi-family residential uses, which are sensitive noise receptors, are located to the north, south, west, northwest, and northeast of the project site at an approximate distance of 15 to 70 feet. The peak day construction noise levels experienced by the off-site sensitive receptors would range from 83 dBA L_{eq} at the residences located to the northeast of the project site to 94 dBA L_{eq} at the residences located north of the project site along Commonwealth Avenue and Hoover Street. Thus, construction activities associated with the proposed project would generate episodic noise levels exceeding the significance thresholds of 67 dBA at R1 (average daytime noise level of 62 dBA plus 5 dBA), 64 dBA at R2 (average daytime noise level of 59 dBA plus 5 dBA), 70 dBA at R3 (ambient noise level of 65 dBA plus 5 dBA), and 63 dBA at R4 (ambient noise level of 58 dBA plus 5 dBA). Therefore, sensitive noise receptors would be exposed to noise levels that exceed significance thresholds for respective zoned residential uses. As such, construction noise impacts to nearby sensitive receptors would be potentially significant. Mitigation Measure MM-NOI-1 requires that temporary construction fences equipped with noise blankets be placed between the project site and the residences to the north, between the project site and the residences to the northeast, and between the project site and the residences to the west and south. Mitigation Measure MM-NOI-2 requires that all construction equipment, fixed or mobile, shall be operated with closed engine doors, if so equipped, and shall include properly operating and maintained residential-grade mufflers consistent with manufacturers' standards. With implementation of mitigation, construction noise impacts would be reduced to less-than-significant levels.

Noise levels generated by truck trips during construction would be below an increase of 5.0 dBA CNEL in an area characterized by conditionally acceptable noise levels, and as such, off-site construction traffic noise impacts would be less than significant.

Noise levels generated by operational traffic increases would be 0.4 dBA CNEL and would be substantially lower than the "clearly noticeable" increase threshold of 5.0 dBA CNEL, and as such, project-related traffic noise increases would be less than significant. Additionally, the project-related traffic noise increases, when measured against the 2023 future conditions, would be less than the threshold and, therefore, impacts would be less than significant. The operation of mechanical equipment such as air conditioners, fans, generators, and related equipment may generate audible noise levels. Mechanical equipment is typically located on rooftops and within buildings. Additionally, mechanical equipment would be designed with appropriate noise control devices, such as sound attenuators, acoustics louvers, or sound screen/parapet walls to comply with noise limitation requirements provided in LAMC Section 112.02, which limits the noise from such equipment causing an increase in the ambient noise level by more than 5 dBA. The project would install mechanical equipment that would generate noise levels below this threshold consistent with applicable regulatory requirements. Therefore, operation of mechanical equipment would not exceed the City's thresholds of significance and impacts would be less than significant. Parking related noise levels would increase the ambient noise level of 65 dBA L_{eq} at the noise sensitive uses by 0.9 dBA, which would be well below the significance threshold of a 5 dBA increase. As such, impacts would be less than significant. On-site operational activity would include the use of the same type and number of fleet vehicles as existing operations. Therefore, no increases in on-site activity would occur and impacts would be less than significant.

Mitigation Measures:

MM-NOI-1: Noise Barrier. The LADWP/contractor shall provide a temporary 20-foot-tall construction fence equipped with noise blankets rated to achieve sound level reductions of at least 24 dBA between the project site and the residences to the north. The LADWP/contractor shall provide a temporary 20-foot-tall construction fence equipped with noise blankets rated to achieve sound level reductions of at least 19 dBA between the project site and the residences to the northeast. The LADWP/contractor shall provide a temporary 13-foot-tall construction fence equipped with noise blankets rated to achieve sound level reductions of at least 15 dBA between the project site and the residences to the west and south. Temporary noise barriers shall be used to block the line-of-sight between the construction equipment and the noise-sensitive receptors during the duration of project construction. Noise barriers shall be heavy-duty materials such as at least 10 once per square yard vinyl-coated polyester (VCP) quilted to sound absorber. All noise barrier material types are equally effective, acoustically, if they have this density. Noise barrier shall have a minimum sound transmission class (STC) of 25 and noise reduction coefficient (NRC) of 0.75.[10, 11]

MM-NOI-2: Construction Equipment. During project construction, all construction equipment, fixed or mobile, shall be operated with closed engine doors, if so equipped, and shall include properly operating and maintained residential-grade mufflers consistent with manufacturers' standards. For example, absorptive mufflers are generally considered commercially available, state-of-the-art noise reduction for heavy duty equipment.[12] Most of the noise from construction equipment originates from the intake and exhaust portions of the engine cycle. According to FHWA, use of adequate mufflers systems can achieve reductions in noise levels of up to 10 dBA.[13] The contractor shall use muffler systems that provide a minimum reduction of 8 dBA compared to the same equipment without an installed muffler system, reducing maximum construction noise levels. Construction noise levels associated with the proposed project would exceed the significance threshold at the off-site sensitive locations. Implementation of Mitigation Measures NOI-1 and NOI-2 would reduce construction noise levels below the significance thresholds. Thus, the project's potentially significant construction noise impact would be reduced to a less-than-significant level with implementation of mitigation measures.

b) Less-than-Significant Impact with Mitigation Incorporated. Construction activities at the project site have the potential to generate low levels of groundborne vibration as the operation of heavy equipment (i.e., dozer, excavators, grader, tractor/loader/backhoe, and haul trucks, etc.) generates vibrations that propagate though the ground and diminish in intensity with distance from the source. No high-impact activities, such as pile driving or blasting, would be used during project construction. The nearest off-site receptors to the project site that could be exposed to vibration levels generated from project construction include single- and multi-family residential uses north, west, and south of the project site. Under the FTA's ground-borne vibration annoyance potential criteria, vibration levels of 72 VdB for frequent events would be considered

[10] Sound Transmission Class (STC) is an integer rating of how well a wall attenuates airborne sound and Noise Reduction Coefficient (NRC) is a scalar representation of the amount of sound energy absorbed upon striking a wall.

[11] M David Egan, Architectural Acoustics, Chapter 2 and Chapter 4, March, 1988.

[12] United Muffler Corp: https://www.unitedmuffler.com/; Auto-jet Muffler Corp: http://mandrelbending-tubefabrication.com/OEM/catalogpages/construction_off_road.php. Accessed August 2017.

[13] Federal Highway Administration. Special Report—Measurement, Prediction, and Mitigation: Chapter 4 Mitigation. https://www.fhwa.dot.gov/Environment/noise/construction_noise/special_report/hcn04.cfm. Accessed August 2017

a vibration criterion for human annoyance. The single- and multi-family residential receptors located north of the project site along Hoover Street and Commonwealth Avenue would be exposed to vibration levels of 94 VdB and the single- and multi-family residential receptors located south and west of the project site would be exposed to vibration levels of 77 VdB, which would exceed the FTA's 72 VdB criterion for human annoyance, when construction activities occur near the property line. Therefore, vibration impacts related to human annoyance would be potentially significant with the use of heavy equipment such as a large dozer along the project boundary. Mitigation measures are therefore prescribed to reduce construction vibration impacts to these sensitive noise receptors. With implementation of Mitigation Measure NOI-3, vibration levels from construction equipment would be reduced to below the significance threshold of 72 VdB for human annoyance. As such, construction vibration impacts related to human annoyance would be reduced to less-than-significant levels with implementation of mitigation measures.

Mitigation Measures

> **MM-NOI-3: Rubber-tired Bulldozers.** The operation of construction equipment that generates high levels of vibration, such as large bulldozers and loaded trucks, shall be prohibited within 85 feet of existing residential structures located north, south, and east of the project site during project construction. Instead, small rubber tired bulldozers not exceeding 310 horsepower shall be used within 85 feet of existing residential structures located north, south, and east of the project site during demolition, grading, and excavation operations. The use of smaller rubber tired bulldozers would result in vibration levels of 65 VdB at the residential buildings to the north, south, and east of the project site, which would not exceed FTA's vibration criteria of 72 VdB for frequent events.

c) No Impact. The project is not located within an airport land use plan and is not within 2 miles of a public use airport or within the vicinity of a private airstrip. The nearest public airport is Bob Hope Airport located at 2627 North Hollywood Way in the City of Burbank, and is approximately 13 miles north of the project area. Therefore, the project would not expose people in the project vicinity to excessive noise levels from airport use. No impact would occur.

Population and Housing

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
XIV. 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) Less-than-Significant Impact. The proposed 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 proposed project would not directly or indirectly induce growth or remove an obstacle to growth, since the proposed project would be implemented to create a functioning maintenance yard. Although the proposed project would require up to 20 construction workers and would increase the number of permanent employees from 52 to 102 on the project site, these individuals are expected to be sourced from existing DWP staff. Therefore, the proposed project would not induce population growth and impacts would be less than significant.

b) No Impact. The proposed project involves the demolition of an existing LADWP Streetlight Facility and would construct a new LADWP District Yard. The proposed project does not involve the demolition or construction of housing. Therefore, the proposed project would not displace people or housing, and no impact would occur.

Public Services

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
XV. PUBLIC SERVICES — Would the project:				
a) 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 LAFD provides fire suppression and emergency medical services to the project site and surrounding area. The primary fire station that would serve the project site is the LAFD Station 6, located approximately 0.5 mile southwest at 326 North Virgil Avenue. 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 replacement of existing facilities and an addition of 50 new employees, for a total of 102, at the project site. Given that the existing uses would be replaced with more modern facility and that the employee population would not increase by much, the proposed project would likely not increase the need for fire protection and emergency medical services in the project area. Thus, there would be no need for new or physically altered fire facilities, the construction of which could cause significant environmental impacts. Therefore, no impact to fire protection and emergency medical services would occur.

a.ii) No Impact. Police protection services in the project area are provided by the Los Angeles Police Department (LAPD). The closest station to the project site is the Rampart Police Station located at 2710 West Temple Blvd, approximately 1 mile southeast of the project site. Once constructed, the project would involve replacement of existing facilities and an addition of 50 new employees, for a total of 102, at the site. Because the existing uses would be replaced with a more modern facility and the employee population would minimally increase, the proposed project would likely not result in a need for new or expanded law enforcement facilities in order to provide adequate police protection services. Therefore, no impact to police services would occur.

a.iii) No Impact. The proposed project involves the demolition of existing structures, and the construction of offices, maintenance facilities, and surface and subterranean parking. The project would not introduce inhabitants to the project area that would require additional schools. No impact would occur.

a.iv) No Impact. The proposed project involves the demolition of existing structures, and the construction of offices, maintenance facilities, and surface and subterranean parking. The project would not introduce inhabitants to the project area that would require additional parks or recreational areas. No impact would occur.

a.v) No Impact. The proposed project involves the demolition of existing structures, and the construction of offices, maintenance facilities, and surface and subterranean parking. The project would not introduce inhabitants to the project area that would require additional other public facilities. No impact would occur.

Recreation

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
XVI. 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?	☐	☐	☐	☒
c) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities, need for new or physically altered park facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, or other performance objectives for parks?	☐	☐	☐	☒

Discussion

a) No Impact. The project site does not contain any recreational facilities. The nearest recreational facility to the project site is the Bellevue Recreation Center about 415 feet to the northeast. Madison West Park is located approximately 1,000 feet to the southeast of the project. 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. Therefore, the proposed project would not contribute to an increase in use of existing neighborhood and regional parks, or other recreational facilities such that substantial physical deterioration of facilities would occur. Thus, no impact would occur.

b) No Impact. The proposed project would involve the demolition of existing structures, and construction of maintenance yard facilities including a District Office building, SCS warehouse, Fleet Maintenance facility, and surface and subterranean parking. The proposed project does not include the development of recreational facilities or require the construction or expansion of recreational facilities. Therefore, no impacts would occur.

c) No Impact. The proposed project involves the demolition of existing structures, and the construction of offices, maintenance facilities, and surface and subterranean parking. The project would not involve new or modified park facilities. No impact would occur.

Transportation

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
XVII. 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) Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐
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

The discussion of potential impacts related to transportation is based on the *Hoover Street District Yard Demolition Project Transportation Impact Study (TIS)*, prepared by Fehr & Peers, Inc. in June 2019, as well as the *Transportation Assessment (TA) Memorandum*, which was prepared in May 2021 to comply with the City's *Transportation Analysis Guidelines* (TAG), which were adopted in July 2019 and updated in July 2020. The TIS and TA are provided in Appendix E. Please note that the TIS prepared for the proposed project includes an operational analysis of seven intersections located near the project site; this information is not relevant to the CEQA analysis presented below, as intersection delay and level of service are no longer used in the determination of a CEQA transportation impact. Other non-CEQA analyses, including a construction period transportation analysis, are also provided in Appendix E.

a) Less-than-Significant Impact. The TA evaluated the proposed project's consistency with plans, programs, ordinances, and policies. In accordance with the City's TAG requirements, this evaluation was conducted by reviewing City documents such as the Los Angeles Municipal Code (LAMC), Los Angeles Mobility Plan 2035, Vision Zero plan, Citywide Design Guidelines, and the Wilshire Community Plan. A summary of the evaluation is provided below.

The proposed project features and design generally support multimodal transportation options and would be consistent with policies, plans, and programs that support alternative transportation, such as those included in Mobility Plan 2035. The proposed project design includes features to minimize impacts to the public right-of-way and enhance the user experience by integrating multimodal transportation options. The proposed project would add street trees along the project site perimeter, and improve the existing street and pedestrian lighting. The proposed project does not propose to narrow sidewalks or remove any existing streetscape amenities or features. The proposed project would provide short-term and long-term bicycle parking in accordance with LAMC requirements.

The project site is currently served by five driveways, three on Hoover Street, one on Clinton Street, and one on Commonwealth Avenue. The proposed project would improve three of the existing driveways as necessary to meet the City's current driveway design standards and remove two existing driveways on Hoover Street. Hoover Street is designated in Mobility Plan 2035 as a Local Street, and Clinton Street and Commonwealth Avenue are designated as Collector Streets. The proposed project would not add any new driveways on Arterial Streets.

The Wilshire Community Plan contains transportation-related objectives, policies, and programs in Chapter III, Land Use Plan Policies and Programs. The polices that are relevant to the proposed project focus on streetscape, accessibility for non-motorized transportation, and parking. The proposed project would not substantially increase hazards, conflicts, or preclude City actions to fulfill or implement projects associated with these facilities and would improve walkability around on streets fronting the project site. As a result, impacts to programs, plans or ordinances would be less than significant.

b) Less-than-Significant Impact. The City's TAG requires an analysis of proposed land use projects to assess whether they could result in a substantial impact on vehicle miles traveled (VMT). In Section 2.24 of the TAG, it is recognized that Public Services (e.g., police, fire stations, public utilities) do not generally generate substantial VMT. Instead, these land uses are often built in response to development from other land uses (e.g., office and residential) and are therefore presumed to have less-than-significant impacts on VMT. On this basis, the proposed project is screened from further VMT analysis and is determined to have a less than significant VMT impact.

c) Less-than-Significant Impact. The proposed project would not alter existing roadways nor include any hazardous design features such as sharp curves or dangerous intersections. No incompatible uses such as farm equipment are proposed. Although the proposed project is not intended to serve the general public, primary pedestrian access to the site would be provided from Hoover Street. Visitors and employees arriving to the project site by bicycle would have the same access opportunities as pedestrians but would need to dismount and walk bicycles through the site. The proposed project's access locations would be designed to the City standards and would provide adequate sight distance, sidewalks, and pedestrian movement controls that meet the City's requirements to protect pedestrian safety. All driveways would intersect with roadways at right angles. Street trees and other potential impediments to adequate driver and pedestrian visibility would be minimal. Pedestrian entrances separated from vehicular driveways would provide access from the adjacent streets, parking facilities, and transit stops.

The proposed project would include the following three driveways:

- A two-way full-access driveway on Hoover Street;
- A two-way full-access driveway on Clinton Street; and
- An outbound only emergency access driveway on Commonwealth Avenue.

The proposed project would reduce the total number of vehicle access points from five to three driveways. Inbound and outbound access for employee/visitor vehicles and smaller fleet trucks will be provided on Clinton Street. Site access for larger fleet trucks will be provided on Hoover

Street. The driveways would be designed to comply with LADOT standards. The driveways would not require the removal or relocation of existing passenger transit stops and would be designed and configured to avoid or minimize potential conflicts with transit services and pedestrian traffic. None of the proposed project frontages are along streets that are part of the High Injury Network. As a result, the proposed project would not substantially increase hazards or conflicts and would contribute to overall walkability through enhancements to the project site. Therefore, impacts would be less than significant.

d) Less-than-Significant Impact. Access to the project site would mainly be provided via US-101 and Hoover Street. Construction activities would be located within the project area and would not impede access to roads adjacent to the project site. Additional construction activities would not be located within roadways and are not anticipated to interfere with traffic flow or emergency response access to the project area. As noted previously, a CTMP would be developed by the contractor and approved by the City to alleviate construction period impacts. One element of the CTMP related to emergency access is coordination with the City and emergency service providers to ensure adequate access is maintained to the project site and neighboring businesses and residences. The operation of all proposed project components (e.g., employee parking, outdoor storage, warehouse, office, and fleet shop parking, of the proposed project would occur on site and would not interfere with emergency response access. Impacts to emergency access would be less than significant.

Tribal Cultural Resources

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
XVIII. TRIBAL CULTURAL RESOURCES — Would the project:				
a) 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

a.i) No Impact. On August 2, 2017, LADWP requested a Sacred Lands File (SLF) search and a list of Native American contacts from the NAHC. The NAHC responded on August 28, 2017, stating that the SLF search returned not results. The NAHC's response also included a list of Native American groups to be contacted for the purpose of government-to-government consultation pursuant to Assembly Bill (AB) 52. On September 18, 2017, LADWP sent letters to the Native American groups indicated by the NAHC notifying them of the project and inviting them to consult on the project in accordance with California PRC Section 21080.3.1. **Table 15, Summary of AB 52 Consultation**, summarizes LADWP's consultation efforts to date. The notification letters included a brief project description, project location map, and LADWP's contact information. LADWP has not received any responses or requests for consultation. As part of LADWP's efforts, no tribal cultural resources were identified within or adjacent to the project site. Therefore, the project would not cause a substantial adverse change in the significance of a tribal cultural resource as defined by PRC Section 21074(a). No impact would occur.

TABLE 15
SUMMARY OF AB 52 CONSULTATION

Contact	Tribe/Organization	Date AB 52 Notice Sent	Response Received
Rudy Ortega, Tribal President	Fernandeño Tataviam Band of Mission Indians	9/18/2017	No response
Andrew Salas, Chairperson	Gabrieleño Band of Mission Indians—Kizh Nation	9/18/2017	No response
Robert Dorame, Chairperson	Gabrielino Tongva Indians of California Tribal Council	9/18/2017	No response
John Valenzuela, Chairperson	San Fernando Band of Mission Indians	9/18/2017	No response
Sandonne Goad, Chairperson	Gabrielino/Tongva Nation	9/18/2017	No response
Anthony Morales, Chairperson	Gabrielino/Tongva San Gabriel Band of Mission Indians	9/18/2017	No response
Charles Alvares	Gabrielino-Tongva Tribe	9/18/2017	No response

a.ii) No Impact. As indicated above, no known tribal cultural resources have been identified within or adjacent to the project as part of LADWP's efforts. Therefore, the project would not cause a substantial adverse change in the significance of a tribal cultural resources as defined by PRC Section 21074(a). No impact would occur.

Utilities and Service Systems

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
XIX. 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) Less-than-Significant Impact. The project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electrical power, natural gas, or telecommunications facilities.

Water and Wastewater

LADWP currently provides water to the project site and LA Sanitation removes wastewater via the existing sanitation network (see above discussion). The proposed project involves demolition of the existing LADWP Streetlight Facility and the construction and installation of a new LADWP District Yard for municipal use within the City of Los Angeles. Due to an incremental increase of permanent office workers at the project site as a result of project implementation, the amount of water required and wastewater generation would increase nominally above baseline conditions. However, construction of the project would include all necessary on- and off-site water and sewer pipe improvements, as needed, to adequately connect the project to the existing water and sewer system. None of the off-site transmission infrastructure would need to be upsized as a result of the proposed project. Additionally, the project would implement all applicable mandatory measures within the City's Green Building Code that would further reduce the project's water use and wastewater generation. The project would also comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic

sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season). As there would be adequate capacity available to accommodate the required fire flows and domestic water demand generated by the project, impacts would be less than significant.

Stormwater

A significant impact could occur if the volume of stormwater runoff would increase to a level exceeding the capacity of the existing storm drain system. The project site is located in a developed portion of Los Angeles that is currently served by stormwater infrastructure. The project site would continue to be predominantly impervious surface. In addition, the project would be required to demonstrate compliance with the Los Angeles LID Ordinance standards. The primary purpose of the LID Ordinance is to ensure that development and redevelopment projects mitigate runoff in a manner that captures rainwater and removes pollutants while reducing the volume and intensity of stormwater flows. As such, the volume of stormwater runoff during peak events would not increase and the construction of new stormwater drainage facilities or expansion of existing facilities would not be required. Therefore, impacts related to stormwater drainage facilities would be less than significant, and no mitigation is required.

Electrical Power, Natural Gas, Telecommunications

The project site is located in a developed, urbanized portion of Los Angeles that is served by existing electrical power, natural gas, and telecommunications services. As described above, LADWP and Southern California Gas Company (SoCalGas) would provide electricity for the proposed project. Table 12, shows the estimated project electricity demand, which would be extremely minimal with respect to SoCalGas and LADWP supplies and would not impact the capacity of existing utility facilities.[14] As such, in the context of the greater Los Angeles service area, the project would not be a substantial source of new demand for electrical or telecommunications services. New connections would be established for the project; however, no substantial electrical, gas, or telecommunications infrastructure is present on or adjacent to the project site that would need to be relocated to accommodate the project. Impacts would be less than significant, and no mitigation is required.

b) Less-than-Significant Impact. State Water Code Sections 10910–10915 (Senate Bill [SB] 610) requires the preparation of a water supply assessment (WSA) demonstrating sufficient water supplies for a project that is (1) a shopping center or business establishment that will employ more than 1,000 persons or have more than 500,000 sf of floor space, (2) a commercial office building that will employ more than 1,000 persons or have more than 250,000 sf of space, or (3) any mixed-use project that would demand an amount of water equal to or greater than the amount of water needed to serve a 500 dwelling unit subdivision. As the project does not meet the established thresholds, no WSA is required.

According to the reliability data in the City of Los Angeles 2015 Urban Water Management Plan (UWMP), over the period from 2020 to 2040, the projected water demand with passive water

[14] The project building and facilities would be all electrically-powered; therefore, the project would not use natural gas.

conservation features will increase from 611,800 acre-feet per year (AFY) to 675,700 AFY, representing an annual increase of 3,195 AFY or 5 percent (LADWP 2015). This estimated supply takes into account its entitled water availability. The UWMP is based on SCAG growth projections and takes into account the all expected regional growth. The UWMP is updated on regular five year cycles and includes programs to meet the supply requirements.

Given the existing water use at the site, and the fact that project design features that reduce water consumption by meeting criteria above the LEED Gold level, the project would result in a nominal increase in water required during operation to support additional office staff. The project would fall within the available and projected water supplies projected in the 2015 UWMP. As there would be sufficient water supplies available to serve the project, impacts regarding supply would be less than significant.

c) Less-than-Significant Impact. The 2017 City of Los Angeles Sewer System Management Plan indicates that the City sewer system has sufficient capacity to handle peak dry-weather flows and has not experienced any wet weather overflows for over a decade (City of Los Angeles 2017b). As stated previously in Item 2.19(a), the increase from 52 to 102 employees would not result in a substantial increase in wastewater generation within the project area given its highly developed nature. The HTP, which is responsible for treating the project site's wastewater, would have the available capacity to treat wastewater flows generated from the project site. Impacts would be less than significant.

d) Less-than-Significant Impact. The proposed project anticipates that a maximum of 50,000 CY of soil would be excavated and hauled off-site for disposal, 32,000 CY of which would be contaminated soil. The 18,000 CY non-contaminated soil would be hauled off-site to the Sun Valley Landfill at 9436 Glenoaks Boulevard in Los Angeles, while the 32,000 CY of contaminated soil would be hauled off-site for disposal at a hazardous waste landfill facility. For the purposes of this analysis, the hazardous waste facility is assumed to be Kettleman Hills Landfill, which is located in the San Joaquin Valley Air Basin, with a remaining capacity of 4,900,000 CY. The Sun Valley Landfill has a remaining capacity of 14,915,064 tons per year million and a maximum permitting daily of 1,823 tons per day. The landfill will cease to operate in January 1, 2026 (CalRecycle 2004). The amount of debris generated during construction is anticipated to be accommodated by the Sun Valley Landfill. As a result, the project is not anticipated to significantly impact landfill serving capacities either daily or throughout the landfill lifetime, and impacts to landfill capacity would be less than significant.

e) Less-than-Significant Impact. As mentioned, the proposed project would be served by a permitted landfill that would be capable of accommodating the district yard's solid waste. During construction, non-recyclable solid waste would be taken to a permitted landfill. During operation, the project would continue to generate municipal solid waste that would be accepted by waste haulers and landfill operators. The district yard would continue to comply with federal, State, and local regulations related to solid waste. Therefore, impacts would be less than significant.

Wildfire

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. 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 currently occupied by the East Hollywood Streetlight Facility, which was constructed in 1926 and currently operates street light maintenance facilities. As shown in **Figure 2, Existing Conditions**, the eastern portion of the project site is currently occupied by structures, including a warehouse, covered parking, office and tool room, a facility for fleet maintenance, street light facility, truck shed, and an open truck shed. The western portion of the site is a surface-level parking lot. According to the California Department of Forestry and Fire Protection (CAL FIRE), the project site is not located within a Very High Fire Hazard Severity Zone (CAL FIRE 2011). This is because the project site is located in an urbanized environment with no potential for wildland fires. 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). Therefore, the proposed project is not anticipated to impact people or structures from wildland fires, and no impact would occur.

Mandatory Findings of Significance

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
XXI. 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 Incorporated. The proposed project is located within a highly urbanized area and the site is currently developed. The proposed project would have minimal potential to impact sensitive wildlife species and natural communities during construction activities. Biological impacts range from no impact to less than significant and no mitigation would be required. Adherence to LAMC Section 17.02 would protect trees on site. The project site does not contain riparian habitat or other sensitive natural communities and does not contain wetlands. The project would adhere to the federal Migratory Bird Treaty Act.

Two historic-period built resources are located adjacent or within the project site. These sites may be indirectly impacted by ground-borne vibration from project implementation. The project would involve earthmoving activities which could potentially unearth or disturb prehistoric archaeological resources. Such actions could unearth, expose, or disturb subsurface paleontological, archaeological, historical, or Native American resources that were not observable on the surface. However, with the incorporation of Mitigation Measures CUL-1 through CUL-6, as well as Mitigation Measures GEO-1 through GEO-4, potential impacts to paleontological or cultural resources that represent major periods of California history or prehistory would be reduced to less than significant.

b) Less-than-Significant Impact. 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. Because the project impacts are generally construction related, the cumulative study area is generally confined to the areas adjacent to the project site, which include residential areas, commercial areas, and public facilities. There are 18 present and reasonably foreseeable projects identified in the project

area that are listed in Table 4 of Appendix E. The closest project is located adjacent on the north side of the project site. The projects identified are characterized as mainly residential and commercial development.

The project's proposed facilities would not impact any scenic vistas, State scenic highways, or generate any light and glare; and cumulative aesthetic impacts would not occur. The project area does not include any agricultural or mineral resources that could be impacted; and the project would have no or less than significant effect on land use, population, housing, public services, and tribal cultural resources. As a result, cumulative impacts related to these resources would not occur.

In addition, air quality, cultural resources, greenhouse gas, noise, hazardous material, water quality, utilities, and traffic impacts that are generated by construction activities would be short-term and limited by construction phasing and the overall short construction period. The minimal emissions, noise, hazardous materials, traffic and water pollutants generated by the project would also be less than cumulatively considerable due to the location of the project and limited construction activities and duration. Furthermore, impacts related to biological resources and cultural resources would be less than cumulatively considerable with implementation of identified mitigation measures. Therefore, the proposed project would not result in any impacts that would be individually limited, but cumulatively considerable resulting from the proposed project. When the potential impacts of the proposed project are viewed in connection with past and ongoing projects, its impacts would not be considered cumulatively considerable.

c) Less-than-Significant Impact with Mitigation Incorporated. The proposed project has the potential to disturb historic sites, disturb contaminated soil and groundwater and potentially expose workers during subterranean parking lot construction, and increase noise levels to surrounding residents. However, construction activities would be temporary impacts and mitigation measures would be implemented to reduce these impacts. Therefore, less-than-significant impacts would occur to cultural, hazards, and noise resources and would not have environmental effects that have the potential to cause substantial adverse effects on human beings, either indirectly or directly.

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SECTION 3
References, Acronyms, and Report Preparers

3.1 Document References

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3.2 Acronyms

Acronym/ Abbreviation	Definition
AB	Assembly Bill
ACM	asbestos-containing material
AERMOD	[USEPA's] AMS/EPA Regulatory Model
AF	acre-feet
AFY	acre-feet per year
AQMP	air quality management plan
AR4	Fourth Assessment Report
AST	aboveground storage tank
Basin	South Coast Air Basin
bgs	below ground surface
BMPs	best management practices
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
Cal EPA	California Environmental Protection Agency
CALGreen	California Green Building Standards
Caltrans	California Department of Transportation
CARB	California Air Resource Board
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CDOC	California Department of Conservation
CELA	[SCAQMD's] Central Los Angeles Station
CFG Code	California Fish and Game Code
CFR	Code of Federal Regulations
CGS	California Geological Survey
CH_4	methane
CMP	congestion management program
CO	carbon monoxide
CO_2e	carbon dioxide equivalents
CRHR	California Register of Historical Resources
CSG	California State Geologist
CTMP	construction traffic management plan
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
CY	cubic yards
dB	decibel
dBA	A-weighted decibel
DOGGR	[California Department of Conservation] Division of Oil, Gas, and Geothermal Resources
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
FMMP	Farmland Mapping and Monitoring Program
GE	geotechnical engineer
GHG	greenhouse gas
gpy	gallons per year
GWP	global warming potential
HAP	hazardous air pollutant
HARP	Hotspots Analysis and Reporting Program
Hazwoper	hazardous materials waste operations
HCP/NCCP	habitat conservation plan/natural community conservation plan
HFC	hydrofluorocarbons

Acronym/ Abbreviation	Definition
HHD	heavy-heavy-duty (vehicle)
HMBP	hazardous materials business plan
hp	horsepower
HRA	health risk assessment
HASP	health and safety plan
HTP	Hyperion Treatment Plant
IPCC	[United Nations] Intergovernmental Panel on Climate Change
IS/MND	initial study/mitigated negative declaration
kBtu	thousand British thermal units
LADOT	Los Angeles Department of Transportation
LADWP	Los Angeles Department of Water and Power
LAFD	Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAPD	Los Angeles Police Department
LA Sanitation	City of Los Angeles Bureau of Sanitation
LBP	lead-based paint
LEED	Leadership in Energy and Environmental Design
LOS	level of service
LST	localized significant threshold
LUST	leaking underground storage tank
MBTA	Migratory Bird Treaty Act
mgd	million gallons per day
MLD	most-likely descendant
MT	metric ton
MMT	million metric ton
MUTCD	Manual on Uniform Traffic Control Devices
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NOx	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NRC	noise reduction coefficient
NRHP	National Register of Historic Places
OEHHA	Office of Environmental Health Hazard Assessment
PCB	polychlorinated biphenyls
PCE	perchloroethene or tetrachloroethene
PDF	project design feature; portable document format
PFC	perfluorocarbons
pLAn	Los Angeles Sustainable City pLAn
$PM_{2.5}$	fine particulate matter that is 2.5 microns or less in diameter
PM_{10}	respirable particulate matter that is 10 microns or less in diameter
ppd	pounds per day
ppm	parts per million
PRC	Public Resources Code
RAP	Remedial Action Plan
RCRA	Resource Conservation and Recovery Act
RWQCB	Regional Water Quality Board
SB	Senate Bill
SCAG	Southern California Association of Government
SCAQMD	South Coast Air Quality Management District
SCEDC	Southern California Earthquake Data Center
SEA	significant ecological area
sf	square feet

Acronym/ Abbreviation	Definition
SF_6	sulfur hexafluoride
SGMP	soil and groundwater management plan
SIP	state implementation plan
SLF	Sacred Lands File
SoCalGas	Southern California Gas Company
SO_X	sulfur oxides
SR	State Route
STC	sound transmission class
SVP	Society of Vertebrate Paleontology
SWPPP	stormwater pollution prevention plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TBACT	Best Available Control Technology for Toxics
TCE	trichloroethene
TIS	traffic impact study
US-101	United States Highway 101
USACE	United Stated Army Corps of Engineers
USEPA	United State Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGBC	United States Green Building Council
USGS	United States Geological Survey
UWMP	urban water management plan
V/C	volume-to-capacity [ratio]
VCP	vinyl-coated polyester
VMT	vehicle miles traveled
VOC	volatile organic compound
WDR	waste discharge requirements
WSA	water supply assessment

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